



**PUBLIC INTEREST ADVOCACY CENTRE**  
**LE CENTRE POUR LA DEFENSE DE L'INTERET PUBLIC**

**ONE Nicholas Street, Suite 1204, Ottawa, Ontario, Canada K1N 7B7**

Tel: (613) 562-4002. Fax: (613) 562-0007. e-mail: [piac@piac.ca](mailto:piac@piac.ca). <http://www.piac.ca>

Michael Janigan  
Counsel for VECC  
(613) 562-4002 ext. 26

July 16, 2012

**VIA MAIL and E-MAIL**

Ms. Kirsten Walli  
Board Secretary  
Ontario Energy Board  
P.O. Box 2319  
2300 Yonge St.  
Toronto, ON  
M4P 1E4

Dear Ms. Walli:

**Re: Vulnerable Energy Consumers Coalition (VECC)**  
**Submission of VECC Interrogatories EB-2012-0260**  
**Festival Hydro Inc.**

Please find enclosed the interrogatories of VECC in the above-noted proceeding. We have also directed a copy of the same to the Applicant.

Thank you.

Yours truly,

Michael Janigan  
Counsel for VECC  
Encl.

cc: Ms. Kelly McCann, Festival Hydro Inc.  
Mr. Scott Stoll, Aird & Berlis LLP

**ONTARIO ENERGY BOARD**

**IN THE MATTER OF**

the *Ontario Energy Board Act*, 1998, S.O. 1998, c. 15 (Schedule B), as amended;

**AND IN THE MATTER OF** an Application by  
Festival Hydro Inc. (Festival) for an order or orders  
approving or fixing just and reasonable  
distribution rates to be effective November 1, 2012 to reflect the  
recovery of costs for deployed smart meters.

**Information Requests of the Vulnerable Energy Consumers Coalition (VECC)**

**VECC Question # 1**

**Reference:** Application, Page 3

Preamble: Festival seeks approval of a SMIRR to recover the annual revenue requirement associated with smart meters installed from inception of the smart meter program through to April 30, 2012 and forecasted smart meter operating expenditures for April 30, 2012 to October 31, 2012.

- a) Please provide the rationale for including smart meter operating expenditures to October 31, 2012 only.

**VECC Question # 2**

- a) Please advise if Festival participated with other LDCs in the implementation of its smart meter program. If so, please discuss any operational efficiencies or costs savings as a result of working collaboratively with other LDCs.

**VECC Question # 3**

**Reference:** Application, Page 14

Preamble: Festival indicates its TOU pricing is scheduled to commence with the first full month's consumption after April 30, 2012. Customers will start to receive their first TOU bill in June 2012.

- a) Please provide an update on the status of the implementation of Festival's TOU billing.

#### VECC Question # 4

**Reference:** Application, Page 2, Program Status

- a) Please summarize the types of meters installed for each rate class.
- b) Please complete the following table to show average costs based on meter type. Please provide a description of "Other Costs".

Class	Type of Meter	Quantity	Meter Cost	Average Meter Cost	Installation Cost	Average Installation Cost	Other Costs	Average Other Costs	Total Average Cost
Residential									
GS<50 kW									
Total									

- c) Please provide a schedule that compares the smart meter financial forecasts (capital & OM&A) in Festival's previous applications to the current application and explain any variances greater than 5%.

#### VECC Question # 5

**Reference:** Smart Meter Recovery Model R1, Sheet 2, 20120529

Preamble: Under section 1.6.3 Capital Costs Beyond Minimum Functionality, Festival shows costs of \$9,660 in 2012, \$109,063 in 2011 and \$26, 424 in 2012 for a total of \$145,147.

- a) Please provide a breakdown of these costs for each year.
- b) Please advise if the costs in 2011 and 2012 are one-time or recurring.

#### VECC Question # 6

**Reference:** Application, Page 20

Preamble: Festival indicates that the most significant incremental cost savings with the implementation of smart meters is the reduction in manual meter reading costs.

- a) Please identify any additional operational efficiencies and cost savings that Festival has experienced or anticipates will result from smart meter implementation. Please quantify any savings.
- b) Please discuss how any savings are reflected in this application.

## **VECC Question # 7**

**Reference:** Application, Page 18

Preamble: The evidence indicates Festival has been collecting a fixed monthly smart meter rate adder from all metered customers since May 1, 2006.

- a) Please provide a breakdown by customer class for the Smart Meter Rate Adder Revenue and associated interest collected from other metered customers.