



PUBLIC INTEREST ADVOCACY CENTRE
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August 14, 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-2012-0265
Brant County Power 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: Brant County Power Inc.

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
Brant County Power Inc. 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, Smart Meter Program Status, Page 1

Preamble: Brant County has installed approximately 9,570 smart meters leaving approximately 40 mandated installations in 2012.

- a) Please summarize the types of meters installed and confirm the quantity of each meter type.
- b) Please provide a breakdown of the type and quantity of meters installed by customer class.
- c) Please complete the following table and include an explanation of “other costs”:

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

- d) Please provide a summary of incremental labour costs incurred by the Applicant to implement its smart meter program in terms of positions, contract type (permanent vs. temporary, part-time vs. full-time), length of employment and work activities.
- e) Please discuss incremental labour costs in 2012 and beyond.
- f) Please provide an update on Time of Use billing.

VECC Question # 2

Reference: Application, Appendix A, Fairness Commissioner Letter

Preamble: Brant County provided a copy of the letter from the Fairness Commissioner.

- a) Please describe Brant County's collaboration with other utilities in the deployment of smart meters.
- b) Please summarize and quantify any benefits Brant County experienced as a result of any collaboration in part (a).

VECC Question # 3

Reference: Cost Allocation for Proposed Rates, Page 3

- a) Please provide an explanation of the system or process Brant County uses to track the purchase of smart meters, the identification of smart meter types through its purchases, the installed cost of smart meters (for example through the use of work orders), and the smart meter installations by meter type and customer class.

VECC Question # 4

Reference: Cost Allocation for Proposed Rates, Page 3

Preamble: Brant County indicates it does not have sufficient data to calculate rate riders based on class specific revenue requirements.

- a) Please describe the data Brant County has regarding the installation of its smart meters.
- b) Please explain what Brant County means by sufficient data and indicate what is information is needed in order to have sufficient data.

VECC Question # 5

Reference 1: Board Guideline G-2011-0001, Smart Meter Funding and Cost Recovery – Final Disposition, dated December 15, 2011, Page 19

Preamble: The Guidelines state, "The Board also expects that a distributor will provide evidence on any operational efficiencies and cost savings that result from smart meter implementation."

- a) Please identify any operational efficiencies and cost savings that Brant County realized or anticipates will result from smart meter implementation.

VECC Question # 6

Reference 1: Application, Cost Allocation, Page 3

Reference 2: Board Guideline G-2011-0001, Smart Meter Funding and Cost Recovery – Final Disposition, dated December 15, 2011, Page 19

Preamble: The Guideline states, “The Board views that, where practical and where data is available, class specific SMDRs should be calculated on full cost causality.” If as a result of its responses to interrogatories, Brantford Power determines adequate data is available, VECC asks that Brantford Power:

- a) Please complete a separate smart meter revenue requirement model by rate class.
- b) Please re-calculate the SMDR & SMIRR rate riders based on full cost causality by rate class.
- c) Please provide a table that summarizes the total Smart Meter Rate Adder Revenue and associated interest collected by customer class.

VECC Question # 7

Reference: Smart Meter Model, Sheet 2

Preamble: Column S on Sheet 2 shows OM&A expenses for 2012.

- a) Please provide a table that summarizes one-time expenses and ongoing expenses.
- b) Please provide a breakdown and explanation of the costs under 1.5.3 Professional Fees and 2.5.3 Program Management.