

September 11, 2012

Ontario Energy Board
PO Box 2319
2300 Yonge St
Toronto, ON M4P 1E4
Attn: Board Secretary

**RE: Brant County Power Inc. (BCP) – Disposition of Smart Meter Variance
Accounts EB-2012-0265**

Please find attached responses to VECC interrogatories.

Please note, a complete response to IR #4 & 6 was not available for this filing and will be submitted at a later date, as referenced in our IRR.

If you have any questions, please do not hesitate to contact me directly.

Sincerely,



Ian McKenzie
Director of Finance and Regulatory Affairs

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.

Response

BCP has filled in the table replicated below to respond to VECC IR # 1 a, b, c

1d) BCP does not see any incremental labour cost (beyond our approved rates) for smart meters in 2012.

1e) TOU billing is active in BCP service territory

Class	Type of Meter	Quantity	Meter Cost	Average Meter Cost	Installation Cost	Average Installation Cost	Other Costs	Total Average Cost
Residential	Sensus	7976						
GS<50 kW	Sensus	1276						
	GE	29						
	Elster	331						
Total		9612	956,311	\$99.50	192,293	\$20.01	520,274	\$54.13

Note: the average meter costs, installation costs and other costs were not tracked by meter type or by customer class.

Other Costs relate to:

- AMRC = \$228,714
- AMCC = \$177,267
- AMI = \$114,293
- Total = \$520,274

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).

Response

Brant County Power worked with the NEPA group to streamline process and minimize costs relating to:

- Shared towers (TGBs) with Brantford
- Installation costs under 1 contract for all of NEPA (Olameter)
- NEPA decided on 1 meter to maximize purchasing power (economies of scale)
- NEPA using the same network and meters was able to share training costs

As BCP's original estimates and budgets were based on this collaborative effort, we don't have the experience to quantify the benefits received. BCP is confident that the applied costs are lower than what they would have been if we worked independently.

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.

Response

BCP used our CIS database to assist in identifying the number of meters required for the project. The CIS system also assisted in organizing meter deployment (following general meter reading cycles) in an efficient manner.

BCP utilized various excel worksheets and general ledger accounts to track costs for the Smart Meter program.

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 information is needed in order to have sufficient data.

Response

BCP was not able to complete VECC IRR's # 4 and 6 as well as Board Staff IR # 14 by the imposed filing deadline. In an effort to provide timely information, this information will be provided as soon as available.

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.

Response

List of operational efficiencies:

- Meter reading (standard and special reads)
- Load optimization / Outage management
- Theft of power alerts
- Low / High voltage warnings.
- Etc..

The only identifiable costs relate to meter reading. BCP will use the standard charge of \$0.44 / outside read to estimate the savings related to smart meters.

Meters / month = 9,612

Months = 12

Rate / Read = \$0.44

Estimated Savings = \$50,751

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.

Response

BCP was not able to complete VECC IRR's # 4 and 6 as well as Board Staff IR # 14 by the imposed filing deadline. In an effort to provide timely information, this information will be provided as soon as available.

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.

Response

The costs identified are one-time or short-term in nature. BCP does not foresee material ongoing expenses relating to smart meter program. As a result the requested table was not completed.

All costs contained in 1.5.3 and 2.5.3 relate to our outsourced project management fees and consulting fees for the Smart Meter project. We used Utili-Assit (in conjunction with the NEPA group) for this function. The costs in 1.5.3 are the capitalized portions and 2.5.3 are the O&M based costs.