



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. <http://www.piac.ca>

Michael Janigan
Counsel for VECC
613-562-4002

October 26, 2012

VIA 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: Independent Electricity System Operator ("IESO"), in its capacity as
Smart Metering Entity ("SME")
Determination of Smart Metering Charge ("SMC")
Board File No. EB-2012-0100
Determination of Appropriate Allocation and Recovery of SMC
Board File No. EB-2012-0211**

Please find attached VECC's interrogatories regarding the evidence filed on October 19th by the Electricity Distributors Association.

Yours truly,

Michael Janigan
Counsel for VECC

**ELECTRICITY DISTRIBUTION ASSOCIATION EVIDENCE RE:
RECOVERY OF SMART METERS CHARGES IN DISTRIBUTION RATES
EB-2012-1011/EB-2012-0211**

VECC's INTERROGATORIES

- 1. Reference:** EDA Evidence, page 1, lines 14-15
SME Application, Exhibit B, Tab 1, page 2, paragraph 19
Board Staff Interrogatory #1
- a) Please confirm that the following electricity distributors have all installed smart meters on customers in the GS>50 class:
- PUC Distribution Inc.
 - London Hydro Inc.
 - Burlington Hydro Inc.
 - Cooperative Hydro Embrun Inc.
 - Midland Power Utilities Corporation
 - Horizon Utilities Corporation
 - EntegrusPowerlines Inc.
 - Fort Francis Power Corporation
- b) Is the EDA aware of any other distributors that have installed smart meters on customers in the GS>50 class (or any other classes apart from Residential)?
- c) If not specifically addressed in response to Board Staff interrogatory #1 do any of the distributors with smart meters on customers in the GS>50 class forward their smart meter read data for such customers to the IESO/SME's MDM/R?
- d) If the response to part (c) is yes (either in part or whole), which ones?
- e) If there are any distributors that do not forward the smart meter read data from their GS>50 customers to the IESO/SME's MDM/R, please confirm how these utilities validate, estimate and edit such data for billing purposes.

2. Reference: EDA Evidence, page 1, lines 19-21

- a) Is the EDA aware of any electricity distributors where some/all non-RPP Residential customers are billed by a retailer as opposed to by the distributor? If yes, please identify.
- b) In such circumstances, should these “customers” be:
 - Included in the customer count used by the IESO/SME to allocate MDM/R costs to distributors?
 - Billed by distributors for a portion of MDM/R costs?

3. Reference: EDA Evidence, page 2, lines 8-10
EB-2012-0384 (Application by Hydro One Networks Inc.)

Preamble: On September 21, 2012 Hydro One Networks filed an Application with the Board effectively requesting exemption from smart metering for some 150,000 customer for an indefinite period of time on the basis that “there are no current options that will meet full compliance”.

- a) In the EDA’s view should such customers be:
 - Included in the customer count used by the IESO/SME for purposes allocating the MDM/R costs to electricity distributors?
 - Included in the customer count used by electricity distributors for purposes of recovering the MDM/R-related charges from the IESO/SME from its customers?

4. Reference: EDA Evidence, page 2, lines 20-22
SME Application, Exhibit C, Tab 2, Appendix A

- a) Please confirm that the customer count used by the IESO/SME in assigning costs to a distributor will be approximately two years out of date relative to the period when the costs will actually be recovered from customers.
- b) If confirmed, does the EDA see any problems with using the same level of SME charge for billing distributors’ customers?

5. Reference: EDA Evidence, page 3, lines 5 – 10

- a) Is the EDA proposing one deferral account that would track all variances in a single “pool” or a deferral account with two sub-accounts that would track separately the variance attributable to differences attributable to each customer class?

*****End of Document*****