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Your reference
EB-2012-0100 /
EB-2012-0211

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Dear Ms. Walli:

**Independent Electricity System Operator EB-2012-0100 / EB-2012-0211
Electricity Distributors Association ("EDA") Responses to Information Requests**

We are counsel to EDA. Enclosed please find EDA's responses to Information Requests from Board Staff, the Association of Major Power Consumers of Ontario ("AMPCO") and the Vulnerable Energy Consumers Coalition ("VECC").

Yours very truly,

"Original Signed by Richard King"

Richard King

RK/mnm

Enclosures

Cop(y/ies) to: All parties in EB-2012-0100/EB-2012-0211 via email

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ELECTRICITY DISTRIBUTORS ASSOCIATION
RESPONSES TO INTERROGATORIES FROM
BOARD STAFF

INTERROGATORY #1

Recovery from Residential and GS <50 kW Customers

1. Ref: EDA Evidence, Page 1, lines 12-15

The EDA supports the SME proposal to recover the SME costs from Residential and GS <50 kW customers, as “these are the end-use customer classes that utilize smart meters and the MDM/R”. Board staff notes that certain LDCs have installed smart meters for GS >50 kW customers. It is Board staff’s understanding that the MDM/R is not used for any customers billed by demand.

- a) Please confirm whether Board staff’s understanding is correct i.e. that no GS>50 kW customers are billed using the MDM/R. If this understanding is not correct, please explain the circumstances for billing any GS > 50kW through the MDM/R, how many customers would be involved and how this would affect the proposed recovery mechanism.

RESPONSE

1. a) Confirmed. While the EDA has not been able to confirm this with all 75 of its members, all of those canvassed have indicated that the MDM/R is not used for any customers billed by demand.

INTERROGATORY #2

Exception Application

2. Ref: EDA Evidence, Page 2, lines 25 to 28

The EDA states that it has consulted with its members regarding its proposal to recover SME costs, however some LDCs may wish to recover the costs in a manner different from that proposed.

- a) To what extent has the EDA consulted with its members on the issue of smart meter charge recovery?
- b) What other proposals were considered in the course of EDA's consultations with its members?
- c) How many of EDA's members are in agreement with the proposal as submitted?
- d) How many of EDA's members are not in agreement with the proposal as submitted?
- e) Is the EDA aware of other proposals that may be submitted in the course of this proceeding, or is it expected that other LDCs may bring forth their own proposals through their own rate proceedings?

RESPONSE

2. a), c), d) and e) As noted in the response to Board Staff Interrogatory #1, the EDA has not canvassed the views of every EDA member on this issue. However, the EDA consulted broadly with its members through regular communication channels, and the issue was discussed at length within the LDC community. Based on the EDA's consultations, the EDA believes that the vast majority (and potentially all) are in agreement with the proposal as submitted. The EDA is not aware of any other proposals that would be submitted in the course of this proceeding, or later in individual LDC rate proceedings.
- b) While the issue of cost recovery of SME costs was obviously discussed at the time, no other proposal was seriously considered.

ELECTRICITY DISTRIBUTORS ASSOCIATION
RESPONSES TO INTERROGATORIES FROM
ASSOCIATION OF MAJOR POWER CONSUMERS OF ONTARIO

INTERROGATORY #1

Recovery of SMC in Distribution Rates

Ref. EDA Evidence, Page 1, Lines 9-15

Preamble: The EDA evidence states “As noted at Exh. C/2/1, para. 73 of the prefiled evidence of the Smart Metering Entity (“SME”) in this proceeding, LDC representatives have worked with the SME on the appropriate rate structure for the Smart Metering Charge (“SMC”). As a result, the SME has brought forward its proposal to recover the costs of the SME by way of a monthly charge per Residential and General Service <50kW customer. These are the end-use customer classes that utilize smart meters and the meter data management/repository (“MDM/R”).

- a) Please confirm that the SMC will not be recovered from classes other than residential and GS<50 kW.
- b) If this is not the case, please describe the circumstances that would result in recovery from classes other than residential and GS<50 kW.

RESPONSE

- 1.
 - a) To the best of the EDA’s knowledge, the EDA can confirm that the SMC will not be recovered from classes other than Residential and GS<50kW. See response to VECC Interrogatory #1 and #2.
 - b) N/A

ELECTRICITY DISTRIBUTORS ASSOCIATION
RESPONSES TO INTERROGATORIES FROM
VULNERABLE ENERGY CONSUMERS COALITION

INTERROGATORY #1

Ref.: 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 kW 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.

RESPONSE

1. a), b) and c) Of the list in (a), London Hydro has not installed smart meters on customers in the GS>50 kW class. The EDA has not had the opportunity to canvas all of its members to determine whether any other have installed smart meters. There may be others but none (to the EDA's knowledge) forward their data to the MDM/R.

d) N/A

e) These utilities validate, estimate and edit data from smart meters installed on GS>50 kW customers using internal processes and software.

INTERROGATORY #2

Ref.: 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?**

RESPONSE

2. a) and b) To the EDA's best knowledge, no retailers offer “retailer consolidated” billing.

INTERROGATORY #3

**Ref.: 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?**

RESPONSE

3. a) The EDA has consulted with HydroOne Networks on this question. It is HydroOne’s view that until those customers have connectivity and their information is being sent to the MDM/R, they should not be included in the customer count used by the IESO/SME for purposes of allocating the MDM/R costs to distributors. As a result, they should not be included in the customer count used by electricity distributors for the purposes of recovering the MDM/R-related charges from the IESO/SME from its customers.

INTERROGATORY #4

**Ref.: 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?**

RESPONSE

4. a) Given that the basis for the IESO/SME in assigning costs is the OEB Electricity Distributor Yearbook, there will of course be a discrepancy between these customer numbers and actual customer numbers due to timing.
- b) No.

INTERROGATORY #5

Ref.: 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?

RESPONSE

5. The EDA is proposing a deferral account with two sub-accounts (for the two rate classes).