



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 ext. 26

February 05, 2013

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-2012-0440
Hydro One Brampton Networks 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: Hydro One Brampton Networks Inc.
Mr. Scott Miller

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
Hydro One Brampton Networks Inc. (HOBNI) for an order or orders
approving or fixing just and reasonable
distribution rates to be effective May 1, 2013 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 11

Preamble: The evidence indicates HOBNI previously applied for disposition and recovery of smart meter costs on two separate occasions (EB-2007-0882 & EB-2010-0132).

- a) Please provide a schedule that summarizes the total capital and OM&A smart meter costs (show minimum functionality and costs beyond minimum functionality separately), the total number of installed meters and total unit costs per installed meter approved in EB-2007-0882 & EB-2010-0132.
- b) Please confirm the types and quantities of smart meters installed by customer class for each application noted above.
- c) Please provide the average unit cost of installed meters by customer class previously approved in EB-2007-0882 & EB-2010-0132.
- d) Please confirm the SMDR and SMIRR rate riders by customer class for each application noted above.
- e) Please provide the planned date for HOBNI's next cost of service application.

VECC Question # 2

Reference: Application, Page 12

- a) The evidence indicates the application is based on costs to September 30, 2012. Please update Table 1 Summary of Audited vs. Unaudited Smart Meter Program

Costs to reflect updated 2012 actuals and forecasted costs for the balance of 2012 if required and 2013.

VECC Question # 3

Reference: Application, Page 13, lines 7-11

- a) Please explain the need and discuss in more detail the work and cost required in 2013 for polyphase meters related to “firmware and hardware related communications issues” to make them fully functional with the AMI.

VECC Question # 4

Reference: Application, Page 13, lines 17-24

- a) Please explain why and how HOBNI was unable to reliably disaggregate smart meter costs between residential and GS<50 kW customers.
- b) Please explain why and how HOBNI was able to reliably segregate smart meter costs for the GS 50 to 699 kW class.

VECC Question # 5

Reference: Application, Page 22, lines 5-14

- a) Please discuss if the smart meter system architecture purchased by HOBNI that facilitates an outage management notification system was approved by the Board for residential and GS<50 kW customers in prior applications (EB-2007-0882 & EB-2010-0132) and included in the determination of the rate riders. If not, why not?
- b) Please provide the incremental capital cost per meter for smart meters with capabilities beyond the minimum functionality requirement as per part (a) approved by the Board in prior applications (EB-2007-0882 & EB-2010-0132).

VECC Question # 6

Reference: Application, Page 24

- a) Please explain why HOBNI tracked the capital and OM&A expenditures and depreciation expenses separately for the GS 50-699 kW customer class, and not for the other customer classes.
- b) Please explain how HOBNI tracked the capital and OM&A expenditures and depreciation expenses for the residential and GS<50 kW customer classes.

VECC Question # 7

Reference: Application, Page 27, Table 6

- a) Of the 11,941 smart meters installed from 2010 to 2012, please provide the total number of polyphase meters and single phase meters installed.
- b) Please provide a breakdown of the number of polyphase meters installed by customer class.

VECC Question # 8

Reference: Application, Page 33, Table 10

- a) Please explain the variance in SM operating expenses, actual compared to forecast.
- b) Please explain the nature of the following costs: communication costs meter reading, HONI operations costs meter read and communications costs meter read.

VECC Question # 9

Reference: Application, Page 34, lines 13-19

- a) Please confirm the additional number of collectors and repeaters installed so data would flow from source to destination.
- b) Please discuss if HOBNI's contract with Trilliant considers the responsibility of costs (Trilliant vs. HOBNI) to achieve system stability (i.e. costs to install additional collectors and repeaters).

VECC Question # 10

Reference: Application, Page 35, lines 1-3

- a) Please provide the data HOBNI relies upon to make the statement "...and installed the majority of these higher cost polyphase meters on the General Service 50 to 699 kW class for customers less than 200kW in 2011".

VECC Question # 11

Reference: Application, Page 49, lines 10-14

Preamble: The evidence indicates HOBNI was unable to break out cost data between the residential and GS<50 kW class customers reliably enough to allocate reasonably between classes but was able to run a combined class model separately from the GS

50 to 699 kW class model since HOBNI was able to break out cost data in sufficient enough detail to do so.

- a) Please discuss the cost data HOBNI has separately for the residential and GS<50 kW customer classes.
- b) Please comment on the cost to install a polyphase meter in the GS<50 kW class compared to the GS 50 to 699 kW class.

VECC Question # 12

Reference: Smart Meter Recovery Model, Residential & GS<50 kW, 20121214, Sheet 2

- a) Please explain the negative entry (\$239,602) under capital costs, line 1.1.1 Smart Meters, in 2012.
- b) Please explain the installation costs in 2012 of \$305,750 since no smart meters are shown as being installed in 2012.
- c) Please provide a breakdown of the \$1,339,603 in 2011 under line 1.3.2 computer software.
- d) Please explain the negative entry (\$147,666) in 2012 under line 1.3.2 computer software.
- e) Please provide a breakdown and details of the costs under line 1.6.1 by year.
- f) Please explain the costs under line 2.2.1 maintenance costs and account for the increase in 2013.