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December 12, 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-2013-0359
Niagara Peninsula Energy 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,

A handwritten signature in black ink, appearing to be 'Michael Janigan', written in a cursive style.

Michael Janigan
Counsel for VECC
Encl.

cc: Niagara Peninsula Energy 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
Niagara Peninsula Energy Inc. (NPEI) for an order or orders
approving or fixing just and reasonable distribution rates
relating to final disposition of Smart Meter deployment,
to be effective February 1, 2014 and May 1, 2014.

Information Requests of the Vulnerable Energy Consumers Coalition (VECC)

VECC Question # 1

Reference: Application, Background Page 11

Preamble: The evidence states “As part the NEPA (“Niagara Erie Power Alliance”) group, a consortium of like sized and geographically located distributors, NPEI retained the services of Util-Assist to consult on the management of its Smart Meter Initiative.”

- a) Please provide the names of the distributors that are part of NEPA.
- b) Please discuss if any efficiencies or cost savings resulted from NPEI’s participation in NEPA.

VECC Question # 2

Reference: Application, Capital and Operating Costs, Page 28

Preamble: NPEI indicates it proposes to address the issue of cost savings from smart meter implementation in its next cost of service rate application.

- a) Please discuss if NPEI has identified any preliminary operational savings at this point in time such as meter reading savings.

VECC Question # 3

Reference: Application, Capital and Operating Costs, Page 20

Preamble: NPEI has participated as part of a group of 31 LDCs working with Util-Assist in the issuance of the May 2010 RFP, “Smart Meter Network Security Audit Services”. Bell Wurdtech (“Bell”) was the vendor selected to provide the audit services for the

Smart Meter network security.

- a) Please provide the status of the security audit.
- b) Please identify the security audit costs included in this application and where they can be found on Sheet 2 of the Smart Meter Model.

VECC Question # 4

Reference 1: Application, Capital and Operating Costs, Page 26

Reference 2: Appendix C, Page 66

Reference 3: Appendix C, Page 68

Preamble: At reference 1, the evidence indicates that projected 2014 operating costs include the salary expense for two incremental Smart Meter Coordinator staff positions to administer the Smart Meter and TOU programs. NPEI notes that these staff positions were created in 2009 and 2010 solely due to the installation of Smart Meters and implementation of TOU billing. At reference 2, NEPI indicates in June 2009 a Smart Meter Coordinator was hired on a contract basis to help with the installation of smart meters that commenced in December 2009 and will be completed in September 2010. At reference 3, NPEI indicates a second Smart Meter Coordinator was hired in August 2010 on a contract basis to assist with the implementation of smart meters and billing.

- a) Please provide the details of the original employment contract for each contract position in terms of proposed length of contract, position status (i.e. temporary, contract, part-time vs. full-time, etc.), work activities to be performed and annual salary.
- b) Please discuss the current status (contract vs. permanent position) and rationale in 2014 for each position noting that NPEI has completed its smart meter deployment and TOU implementation.

VECC Question # 5

Reference: Application, Page 1

Preamble: NPEI proposes an effective date of February 1, 2014 for the SMDR.

- a) Please confirm the rationale for an effective date of February 1, 2014 compared to May 1, 2014.

VECC Question # 6

Reference: 2014 Smart Meter Model, Sheet 2

- a) Please provide an explanation of the increase in costs at line 2.3.2 Software Maintenance for the years 2012 to 2014.
- b) Please provide an explanation of the increase in costs at line 2.5.3. Program Management for the years 2011 to 2014 compared to 2010.
- c) Please provide an explanation of the costs at line 2.5.6 Other AMI expenses for the year 2010.
- d) Please provide an explanation of the Professional Fees at line 1.5.3 for the years 2012 to 2014.