



PUBLIC INTEREST ADVOCACY CENTRE
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January 10, 2014

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-2013-0348
Enwin Utilities Ltd.

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: EnWin Utilities Ltd.

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
EnWin Utilities Ltd. (EnWin) for an order or orders
approving or fixing just and reasonable distribution rates
relating to final disposition of Smart Meter deployment,
to be effective May 1, 2014.

Information Requests of the Vulnerable Energy Consumers Coalition (VECC)

VECC Question # 1

Reference: Application, Page 3

Preamble: EnWin indicates it is not seeking recovery at this time for any costs that exceed minimum functionality required by the Province of Ontario. EnWin is in the process of preparing for TOU, including CIS system upgrades, web presentation and integration with the Province's MDM/R, which the Board is aware of. EnWin further states "This application is specific to the Smart Meter Initiative costs and recovery and thus those related but discrete activities are out of scope".

- a) Please explain further why EnWin is not seeking recovery at this time for costs that exceed minimum functionality and include a summary of any discussions on this issue with the OEB.
- b) When does EnWin plan to seek recovery of these costs?
- c) Please provide a summary of costs to date for costs that exceed minimum functionality (OM&A and capital).

VECC Question # 2

Reference: Page 4

Preamble: EnWin indicates it retained the services of an in-house Project Manager for the management of the Smart Meter Initiative.

- a) Please provide details on the filling of the Project Manager position (i.e. new external hire, temporary redeployment of existing staff, new internal hire, temporary vs. permanent position, length of contract, annual cost)?

- b) Please discuss if the Project Manager position is currently in place and its role.

VECC Question # 3

Reference: 2014 Smart Meter Model, Sheet 2

- a) At line 1.5.1 Customer Equipment, the amount for 2011 shows \$36,486. At page 6 of the application, \$36,364 is shown. Please confirm the amount in 2011 for Customer Owned Equipment.
- b) Please provide an explanation of the costs at line 2.5.3 Program Management.

VECC Question # 4

Reference: General

- a) The SMIRR will be in place until EnWin's rates are next rebased. When does EnWin anticipate this will be?
- b) Please provide any operational efficiencies and cost savings resulting from smart meter deployment and discuss how any cost savings are reflected in the current application.

VECC Question # 5

Reference: Application, Page 4

Preamble: EnWin indicates it installed 77,722 residential and 7,305 GS<50 kW smart meters.

- a) Please provide a table that shows the average installed cost by meter type and customer class.

VECC Question # 6

Reference 1: Appendix H, Smart Meter Model (V4)

Preamble: EnWin completed the Smart Meter Model to calculate the proposed Smart Meter Disposition Rate Rider (SMDR) and proposed Smart Meter Incremental Rate Rider (SMIRR).

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.

- a) Please discuss if EnWin kept records by class and if accounts 1556 and 1555 are segregated by rate class? If not, why not?
- b) Please provide the SMFA amounts collected by rate class.
- c) Please complete a separate smart meter revenue requirement model by customer class based to recalculate the SMDR and SMIRR rate riders based on full cost causality by rate class. Please provide live smart meter models.
- d) Please summarize the recalculated SMDRs and SMIRRs by customer class.

VECC Question # 7

Reference: Application, Pages 2-3

Preamble: The evidence states "...the Applicant was able to implement the Smart Meter Initiative much more cost effectively than the provincial average. ...That is, the Applicant avoided \$7.4 million in total costs to the direct benefit of its ratepayers."

- a) Please discuss if there are any unique factors to Enwin that EnWin believes contributed to its smart meter deployment process resulting in costs 42% less than the provincial average.