



February 7, 2014

Ontario Energy Board
P. O. Box 2319
2300 Yonge Street, Suite 2700
Toronto, Ontario M4P 1E4

Attention: Ms. Kirsten Walli
Board Secretary

**RE: Proposed Amendments to the Distribution System code
Board File No.: EB-2013-0311**

Dear Ms. Walli:

Essex Powerlines Corporation (Essex) submits the following written comments on the proposed amendments to the Distribution System Code to require distributors to install a MIST (Metering Inside the Settlement Timeframe) Meter for any existing and future customers that have an average monthly peak demand during a calendar year of over 50kW.

In section B of the proposed amendments to the DSC, the Board is not prescribing meter specification or metering system functionality beyond the minimum required to enable spot pricing based on actual consumption (i.e. an interval meter). However, in the last paragraph of this section, it states "The Board expects that distributors will install interval metering systems that communicate through the distributor's Advance Metering Infrastructure (AMI) installed as part of Ontario's smart meter initiative. Essex recommends that the use or non-use of the AMI system be determined by the distributor based on a cost/benefit analysis.

Current MIST meters on customer accounts that are being billed on spot price are not communicating through the AMI system and there are several reasons for this including quality of data, quality of communication, validation of data etc. The AMI system has inherent issues with data communication that can affect data reliability.

For MIST meters that require more data transfer and information compared to residential meters, the AMI may not be able to transfer the necessary information to accurately bill these customers. While Essex will investigate the AMI system as a method of communication and validation, the final manner of communication should not solely be the AMI system.

The current type of meter and communication systems should be allowed to remain in place if they are meeting the needs of the distributor, the customer and the OEB requirement for TOU pricing. Allowing the current situation to remain would reduce the stranded costs that would be borne by this customer class. Essex is suggesting that it should be left to the distributor to decide on the best cost effective and quality method to meet the standard.



If the proposed amendments are implemented, Essex is of the opinion that the 5 year timeline to change-out existing meters is adequate.

Essex agrees that the stranded costs of the old meters should be borne by the applicable customer rate classes.

A handwritten signature in black ink, appearing to read 'RD Dimmel', is positioned in the center of the page.

Richard Dimmel, CPA,CMA
Vice President, Regulatory Affairs
Essex Powerlines Corporation
Tel: 519-737-9811 ext 214
Fax: 866-291-5317
rdimmel@essexpowerlines.ca

