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February 6th, 2014

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

Attention: Kirsten Walli

Dear Ms. Walli:

RE: PROPOSED AMENDMENTS TO THE DISTRIBUTION SYSTEM CODE - BOARD FILE NO.: EB-2013-0311

Rodan Energy Solutions wishes to commend the Ontario Energy Board for the proposed amendments to Distribution System Code Section 5.1.3 and express our thanks for the opportunity to comment. We believe that mandating the use of interval meters for customers with a monthly average peak demand of 50 kW and above will provide significant benefits to these consumers and to utilities. These changes, when implemented, will greatly enhance the consumer's ability to engage in demand response, energy efficiency and conservation initiatives.

Among the barriers to customer participation in intelligent load management is access to their data in real time or near-real time. Rodan encourages the OEB to give special consideration to the following meter functionality that will further facilitate CDM/DSM participation:

- ***Metering installations to have a customer-accessible communication port***. To provide customers with direct access to the metering data for real time energy monitoring and management, each interval meter should be equipped with a communication port such as a pulse outputs or Modbus protocol connectivity. While standard interval meters can allow for direct download of data, they usually cannot support real-time or continuous streaming (i.e. data is typically only bulk downloaded by the LDC once per day and available to the customer next day). By providing customer access to a communication port, LDCs can enable the customer to interface to the meters in order to obtain immediate meter data without inhibiting the meter's primary settlement functions or congesting the LDC's own communications. They will be able to better use this data to make informed decisions on how they are using their power and to benchmark their performance. It will also enable them to participate in demand response as they will know in real-time whether they are meeting their DR commitments.
- ***Interval resolution of 5 minutes.*** OPA and IESO demand response programs require the customer to provide 5 minute interval data. The vast majority of interval meters installed to date by LDCs in Ontario are only able to provide 15 minute or 1 hour intervals. This creates a disconnect between what is required by the grid operator and the metering technology deployed by the LDC to the customer. Present programs have exemptions that allow 15 minute interval data, but the trend is for programs to increasingly move toward using 5 minute data as they transition to become market-based. Requiring 5-minute meters will ensure that customers do not have to incur additional and unnecessary costs to upgrade the meter in order to participate in various DSM initiatives.

These meter features are important because customers require “near real time” data to participate in DR programs. In addition, access to such data allows for cost effective energy management and verification of energy efficiency measures. Enabling these tools to date has required the LDC to install communication outputs and new meters, and for the DR provider to install communication hardware to harvest the data from the LDC meter to forward to a server for presentment. This has added significant costs and time delays which can be avoided by including these two minimum requirements to the metering specifications.

To avoid inconsistency across Ontario, we recommend that the OEB include minimum requirements for metering installations that provide for: a) customer access to a meter communication port; and b) meters that provide 5-minute interval data.

Rodan would be pleased to further discuss our recommendations.

Yours very truly,

RODAN ENERGY SOLUTIONS INC.

Rick Goddard
Manager, Network Operations