

London Hydro 111 Horton Street P.O. Box 2700 London, ON N6A 4H6

December 4, 2014

Ms. Kirsten Walli Board Secretary Ontario Energy Board P.O. Box 2319 2300 Yonge Street, 27th Floor Toronto, ON M4P 1E4

## Re: Application for a Distribution Licence Amendment Board File No. EB-2014-0292

Dear Ms. Walli:

Please find attached our reply to Board Staff submission.

If you require any further information, please contact the undersigned.

Respectfully yours,

Martin Benum, CPA, CMA, BBM Director of Regulatory Affairs Telephone (519) 681-5800 ext. 5750 Fax (519) 661-2596 benumm@londonhydro.com



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## LH Reply Submission

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3 London Hydro Inc. ("London Hydro") filed an application on September 11, 2014 with the 4 Ontario Energy Board (the "OEB") under section 74 of the Ontario Energy Board Act, 1998, (the "Act") to amend its electricity distributor licence. The amendment sought reflects a temporary 5 6 exemption until December 31, 2015, from section 5.1.3 a) of the Distribution System Code (the 7 "DSC"). Section 5.1.3 a) requires distributors, starting August 21, 2014, to install a MIST 8 (interval) meter on any new installation that is forecast by the distributor to have a monthly 9 average peak demand during a calendar year of over 50 kW.

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11 London Hydro applied for a temporary exemption until December 31, 2015, which will allow 12 London Hydro time to implement a smart meter interface configuration for the MV90 data 13 management system, currently under development by the manufacturer. London Hydro states 14 that this approach will be the most efficient and cost effective conversion of this customer class 15 to interval metering.

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Board Staff filed interrogatories in respect to this application on November 4<sup>th</sup>, 2014. London 17 Hydro filed its response to the interrogatories on November 19th, 2014. On December 4, 2014 18 19 Board Staff filed their submission with respect to London Hydro's request.

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21 London Hydro concurs with Board staff's comments. London Hydro wishes to thank Board staff 22 for their attention to this application.

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All of which is respectively submitted.