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November 30, 2015

via RESS e-filing – signed original to follow by courier

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

Dear Ms. Walli:

Re: Toronto Hydro-Electric System Limited ("Toronto Hydro") Ontario Electricity Support Program Self-Certification Requirement (EB-2015-0148)

Toronto Hydro writes regarding the above-noted matter.

Toronto Hydro is in receipt of the OEB staff's November 24, 2015 e-mail that extends the completion deadline for the Phase Three Ontario Electricity Support Program (OESP) implementation activities to December 15, 2015, along with the updated self-certification form reflecting the changed deadline.

By way of this letter, and as reflected in the appended High Level Project Plan, Toronto Hydro notifies the OEB that as of November 30, 2015 it has completed 83% of activities contemplated under Milestone 3, and that it is on course to complete the remaining activities by December 15, 2015, subject to any unanticipated disruptive factors.

Given the complexity of the OESP program and the role of third parties in the remaining tasks, the utility is not currently in a position to sign the Phase Three Self-Certification form, as amended by the OEB on November 24, 2015. Toronto Hydro will provide the OEB with the Phase Three Self-Certification Document once all activities comprising the milestone are completed.

Toronto Hydro thanks the OEB for providing the utilities with additional flexibility ahead of the launch of this important program and looks forward to continued collaboration with the OEB on this and other programs to support vulnerable electricity consumers.

Please do not hesitate to contact me if you have any questions.

Yours truly,

[original signed by]

Amanda Klein

Vice President, Regulatory Affairs & General Counsel Toronto Hydro-Electric System Limited regulatoryaffairs@torontohydro.com

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att. OESP High Level Project Plan



Ontario Electricity Support Program (OESP)

OESP High Level Project Plan and Go-Live Readiness Checklist

High Level Project Plan

The High Level Project Plan is to be used in association with the Self-Certification Sign-Off Report to help a Utility prepare to meet key milestones of the project and to effectively offer and apply OESP to eligible customer's bills for January 1st, 2016. The Utility is expected to complete and submit this High-Level project plan along with its completed Self-Certification Report (August 26, October 9 and November 30). The Utility should indicate the planned start and completion date of activities required to complete each key milestone. For select activities below, target dates have been provided to enable utilities to develop their planned activities to align with these dates. Identifying the % complete for each activity will help the Utility identify the total progress for each milestone when submitting the Utility's Self-Certification Sign-Off Report. If a particular milestone is not applicable to your Utility, please indicate your reasoning.

	Preparat	ion for Customer Confirmation Interface test with the CSP	Start	End	%
					Complete
ONE	1.	Utility returns high level project plan (this Table) to OEB	09/08/15	08/26/15	100%
STONE	2.	Customer Confirmation Interface system build	07/01/15	08/28/15	100%
MILES	3.	Customer Confirmation Interface internal test	08/31/15	09/08/15	100%
	4.	Milestone One Complete: Utility ready to test Customer Confirmation Interface with CSP		08/26/15	100%

MILESTONE TWO	Preparati	on for Customer Tariff and Onetime Adjustment Interface test with CSP	Start	End	% Complete
	5.	Billing System Build / Configuration	06/22/15	10/02/15	100%
	6.	Billing System test (internal to Utility)	06/22/15	10/02/15	100%
	7.	Initial OESP Communications to customers	07/20/15	09/28/15	100%
	8.	Customer Tariff Interface system build	08/14/15	10/07/15	100%
	9.	One Time Adjustment Interface system build	08/14/15	10/07/15	100%
	10.	Customer Tariff Interface internal test	10/07/15	10/16/15	100%
	11.	One Time Adjustment Interface internal test	10/07/15	10/16/15	100%
	12.	Milestone Two Complete: Utility ready to test Customer Tariff and One Time		As early as:	100%
		Adjustment interfaces with CSP		08/28/15 As late as: 10/09/15	Target date: 10/16/15

	Milestone Three: Preparation for OESP Effective start (updated November 24, 2015)	Start	End	% Complete
	13. Bill print development	08/24/15	10/30/15	100%
HREE	14. Bill print testing	11/09/15	12/10/15	75%
ONE TI	 Utility systems and processes are in place to collect the OESP charge from all applicable customers 	10/05/15	12/15/15	50%
MILEST	16. Utility systems and processes are in place to begin settlements with the IESO settlements system in January 2016	10/15/15	12/15/15	90%
2	17. Technical support organization ready (e.g. for Secure FTP support)	11/02/15	11/30/15	100%
	 Milestone Three Complete: Utility is fully ready to offer and apply OESP to eligible customers' bills (Target Date Nov 30 2015, latest Dec 15 2015) 		12/15/15	83%

Other Key Dates	Start	End	Complete (Y/N) (as at date of submission)
19. Customer Confirmation Interface test with CSP Complete		09/30/15	Y
20. Utility ready for Customer Confirmation Interface in Production		10/26/15	Y
21. Customer Tariff and One Time Adjustment Interface test with CSP Complete		11/12/15	Y
22. Utility ready for Customer Tariff and One Time Adjustment Interface in Production		11/16/15	Y
23. Utility Training (technical, contact centre etc.) complete and OESP processes are in place	10/08/15	12/04/15	N
24. Utility ready for January 1 2016 go-live of OESP Program (Latest Mid-Dec)		12/15/15	N
 Utility submits update to High Level project plan (Milestone 3 section this table as updated in late Nov) to OEB 		11/30/15	Y

Go-Live Readiness Checklist

The Go-Live Readiness Checklist is available for Utilities to use as a tool to further break down each of the OESP activities listed in the Project Plan and help aid the Utility to identify the % complete for each activity. Note that there is no need to submit this Checklist to the OEB. Please note that a Utility may require more steps to complete an OESP activity then the ones listed in the Go-Live Readiness Checklist. The Utility will ultimately be responsible for completing all actions necessary, both standard and unique to the Utility, to ensure that it has sufficiently completed steps necessary to successfully reach OESP milestones.

Activity	Complete	Notes
Customer Confirmation Interface system build		
Have you read and understood the OESP Technical Interface spec?		
 Is building your Customer Confirmation Interface proceeding as you expected and if not, are plans and mitigations are in place to address this? 		
Customer Confirmation Interface internal test		
• Have you prepared test cases (including test data) for your internal testing?		
• Is your internal testing proceeding as you expected and if not, are plans and mitigations are in place to address this?		
 Is the appropriate person in your organization ready to certify, in writing to the OEB, that your interface system required to support the Customer Confirmation interface has passed testing within your organization and is ready to be tested with the CSP? 		
Customer Confirmation Interface Test with CSP		
• Have you received an account for the CSP Self-Verification Test Portal and the Test SFTP site?		
Have you authorized your test environment IP with the CSP?		
• Have you logged in and verified that you have a UtilityID?		
Have you read and understood the CSP test plan for the Customer Confirmation Interface found on the OESP Secure Website?		
 Have you successfully executed the various testing scenarios as outlined in the CSP test plan for the Customer Confirmation interface? This includes, for each test scenario: Generating a test Customer Confirmation request XML through the CSP Self-Verification test portal using test data Successfully connect to the Test SFTP and retrieve the generated test Customer Confirmation request XML for processing Process the generated test Customer Confirmation request XML and generate the corresponding Customer Confirmed response? Upload the Customer Confirmed response to the Test SFTP for CSP processing and validation within the CSP Self-Verification Test portal 		
Have you communicated with the CSP for technical assistance if you have received errors during your Customer Confirmation Interface testing?		
• Is your testing with the CSP proceeding as you expected and if not, are plans and mitigations are in place to address this?		
Have you successfully completed all steps related to Customer Confirmation Interface outlined on the CSP's Self-Verification Test portal?		

Activity	Complete	Notes
Billing System Build		
Have the organization(s) delivering development and test services (internal or external) read and understood the OESP program documentation on the OEB's website?		
• Are your billing system changes proceeding as you expected and if not, are plans and mitigations are in place to address this?		
Billing System Test (internal to Utility)		
 Is your testing proceeding as you expected and if not, are plans and mitigations are in place to address this? 		
Contact Center Training		
Have you identified individuals within your organization who will receive questions related to the OESP?		
• Has your Utility's Trainer attended a "Train the Trainer" training session offered by the OEB?		
Has your Utility's Trainer trained all necessary individuals (mentioned above) who will receive questions related to the OESP?		
Is your Utility prepared to receive customer questions related to the OESP and give appropriate responses?		
Technical Support Organization training (e.g. for Secure FTP support)		
Have you identified individuals within your organization that will be managing interactions between your Utility and the CSP via secure FTP?		
Is your Utility prepared to Support transactions between your Utility and the CSP		
OESP Communications to customers		
• Have you posted a link to the OESP website on your Utility's webpage?		
• Have you selected any additional communications that you would like to offer to your customers from the OESP Secure Project Website and are you prepared to begin distributing this communication?		
Customer Tariff Interface system build		
Have you read and understood the OESP Interface spec?		
• Is building your Customer Tariff Interface proceeding as you expected and if not, what plans and mitigations are in place to address this?		
One Time Adjustment Interface system build		
Have you read and understood the OESP Interface spec?		
• Is building your One Time Adjustment Interface proceeding as you expected and if not, are plans and mitigations are in place to address this?		
Customer Tariff Interface internal test		

Activity	Complete	Notes
Have you prepared test cases (including test data) for your internal testing?		
Is your testing proceeding as you expected and if not, are plans and mitigations are in place to address this?		
One Time Adjustment Interface internal test		
• Have you prepared test cases (including test data) for your internal testing?		
Is your testing proceeding as you expected and if not, are plans and mitigations are in place to address this?		
Customer Tariff and One Time Adjustment Interfaces Test with CSP		
Have you communicated with the CSP for technical assistance if you have received errors during your Customer Tariff Interface and One Time Adjustment Interface testing?]	
 Is the appropriate person in your organization ready to certify, in writing to the OEB, that the interface system required to support the Customer Tariff interface and One Time Adjustment interface has passed testing within your organization and is ready to be tested with the CSP? 		
Bill print development		
Have you read and understood all requirements for OESP-related bills?		
Have you engaged with your (internal or external) bill print organization and do they understand the requirements for OESP-related bills?	d	
Bill print testing		
 Is your testing proceeding as you expected and if not, are plans and mitigations are in place to address this? 		
• Is the appropriate person in your organization ready to certify, in writing to the OEB, that your bill print system has passed testing within your organization?		
Readiness to collect OESP charge from all applicable customers		
• Are you able to apply and collect the appropriate OESP charge to the bills of all applicable customers?		
Readiness to settle OESP charges and rates with IESO		
Are your systems and processes ready to provide Settlement data to the IESO once their system is live in January 2016?	1	
Long Term Readiness		
• Are there individuals within your organization ready to support the long term sustainment of OESP?		
• Is the appropriate person in your organization ready to certify, in writing to the OEB, that your Utility is fully ready to offer and apply OESP to eligible customer's bills?		