

October 27, 2016

Irina Kuznetsova
Policy Advisor
Ontario Energy Board
P.O. Box 2319
2300 Yonge Street, Suite 2700
Toronto, ON M4P 1E4

Dear Ms. Kuznetsova:

## Re: Board File no. EB-2016-0284; Application to renew the Smart Metering Entity License

The Electricity Distributors Association (EDA) represents the collective voice of Ontario's local electricity distribution sector, which safely and reliably delivers power to millions of homes, businesses and public institutions. The EDA draws together under a single umbrella approximately 63 of the local distribution companies (LDCs) that deliver electricity to homes and businesses across Ontario. The distribution sector as a whole employs 10,000 people directly, holds \$19 billion in assets, and makes hundreds of millions of dollars annually in direct contributions to both municipal and provincial revenues.

On September 30, the Independent Electricity System Operator (IESO) filed an application as the province's Smart Metering Entity (SME) to the OEB for a renewal of its SME license and a renewal of the SME/ LDC Agreement to December 31, 2036, for a period of 20 years. On October 14, the OEB responded to the IESO confirming the receipt of the application and notifying it that the application will be decided by an employee of the OEB who has been delegated this authority pursuant to Section 6 of the Ontario Energy Board Act 1998. The letter also informs the IESO that the decision on the application will be made without holding a hearing for the application.

While LDC representatives participated in the Working Group, the IESO did not advise of its intention to seek a 20-year term for the licence and thus this was not the subject of discussion or input. A 20-year term is unprecedented and has significant cost and other implications for ratepayers and the LDCs which must be addressed. The EDA is therefore requesting that the OEB establish a formal process to give interested parties an opportunity to review the application, request additional information if needed and make submissions. Since the IESO is asking for the application to be decided before the implementation of the collection of additional smart meter data starting January 1, 2017, the EDA urges the OEB to establish this process at its earliest convenience.

If you have any questions, please contact the EDA's Vice President of Policy and Government Affairs Justin Rangooni at <u>irangooni@eda-on.ca</u> or at (905) 265 5325. We look forward to the next steps in this application process.

Sincerely,

Teresa Sarkesian

**President and CEO** 

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cc: Peter Fraser, Vice President, Consumer Protection and Industry Performance

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