

February 26, 2019

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

Dear Ms. Walli:

Re: EB-2018-0316 - Application by the Smart Metering Entity/IESO for Approval to Charge Market Prices for Third Party Access to its Data

Please find, attached, the interrogatories from the Consumers Council of Canada in the above-referenced proceeding.

Yours truly,

Julie E. Girvan

Julie E. Girvan

CC: All parties

**INTERROGATORIES FOR THE IESO/SME
FROM THE CONSUMERS COUNCIL OF CANADA**

EB-2018-0316

1 - Is the SME's proposal that access should be provided at market prices appropriate?

CCC-1

Did the SME consider pricing models other than the proposal to provide access at market prices? If so, what models were considered and what was the basis for rejecting those proposals?

CCC-2

Is there currently a significant demand for TPA to the IESO data? Please provide 5 examples of how this data would be used by those entities seeking access. What types of entities are requesting access to the data?

CCC-3

How, specifically, would the market prices be determined by the SME? How will the IESO/SME demonstrate that the prices are market based?

2 - Is the SME's proposal that access should only be provided to any person who meets the criteria for access established by the SME and enters into a Data Use Agreement with the SME appropriate?

CCC-4

Please explain why type of relief the SME is seeking from the OEB with respect to access to its data. Does the SME expect the OEB to approve the criteria for access? Is the SME seeking approval of its Data Use Agreement?

3 - Is the SME's licence amendment proposal appropriate?

CCC-5

(Ex. A/T1/S1/p.3) The SME is seeking approval to amend its licence to allow it to provide access to the data to any person who meets the terms of access established by the SME and enters into a Data Use Agreement with the SME. Is the SME seeking approval from the OEB of the DUA?

4 - Are the IESO/SME's proposal and methodology for calculating net revenues generated by third party access and the proposed allocations of those revenues to Smart Metering Entity Charge ratepayers appropriate?

CCC-6

Please describe, in detail, how the net revenues will be calculated. What methodology will the SME use to refund the net revenue to customers?

CCC-7

(Ex. B/T3/S1/p. 2)

Please file the BDR Cost Allocation Study.

CCC-8

(Ex. B/T3/S1/p. 2)

The evidence sets out three categories of costs – dedicated SME staff costs, costs for services from the IESO staff that are not dedicated to the SME and external costs. Has the IESO/SME prepared a budget for the service? If so, please provide that budget. What have been the costs incurred to date with respect to the development of the TPA program. How have those costs been recovered?

CCC-9

(Ex. B/T3/S1/p. 2)

Are there system related costs that will be allocated to the TPA program? If not, why not?

7 – Is the SME’s proposal to annually report on the net revenues generated and tracked in the Benefits Account in the annual report filed with the OEB by May 31st appropriate?

CCC-10

Please set out the level of detail that will form the annual report provided to the OEB.

8 – Were the stakeholder engagement efforts undertaken by the SME regarding third party access to data at market prices sufficient?

CCC-11

Are the LDCs supportive of the SME’s proposals to provide data to third parties? If not, please explain what their concerns are.

9 – In the event the revenues from the Third Party Access Program are less than the cost of developing and operating that program, what entity would be responsible for such a deficit?

CCC-12

In the event the program costs exceed the revenues please explain how any deficit would be treated.

10 – What steps has the IESO/SME taken to ensure that the data is sufficiently protected and to prevent it re-identification, and are those steps sufficient? What conditions, if any, should be included in the SME’s licence to ensure privacy protection in respect of the data?

CCC-13

(Ex. B/T1/S1/p. 1)

The evidence states that “the risk of re-identification is not zero”. Please explain in detail how the data could be “re-identified”. Please explain in detail all measures the SME is taking to avoid this risk.

11- What are the overall objectives of the IESO/SME regarding its proposals to provide data to third parties at market prices? How will the OEB determine whether these objective s have been met?

CCC-14

Please set out the overall objectives of the IESO/SME regarding its proposals to provide data to third parties at market prices. How will the IESO/SME demonstrate to the OEB that the objectives have been met?

CCC-15

(Ex. B/T6/S1/p. 2)

The evidence states that there is the potential for significant financial benefit for the SME ratepayer. Has the IESO/SME estimated what the financial benefit might be for customers? If so, please provide those estimates.