

March 24, 2021

VIA EMAIL

Ms. Christine E. Long
Registrar
Ontario Energy Board
2300 Yonge St., Suite 2700
Toronto, ON M4P 1E4
Email: registrar@oeb.ca

Dear Ms. Long:

Re: Alectra Utilities Corporation (“Alectra Utilities”), Application for an Amendment to its Electricity Distribution Licence – ED-2016-0360

Alectra Utilities (“Alectra”) seeks approval for an amendment to its distribution license to exempt it from the requirement to implement Metering Inside the Settlement Timeframe (“MIST”) infrastructure for all customers with a monthly average peak demand of over 50 kW by March 31, 2021 (EB-2013-0311).

Background

On May 21, 2014, the Ontario Energy Board (“OEB”) introduced an amendment to the Distribution System Code (“DSC”) in order to effect changes to the metering of energy delivery to certain customers. Specifically, the amendment sought to encode similar metering treatment for customers with a monthly average peak demand of over 50 kW to that of customers billed Time-of-Use (“TOU”) or hourly prices, through the use of MIST meters. The following section of the DSC describes electricity distributors’ obligations in this regard:

5.1.3 For the purposes of measuring energy delivered to the customer, a distributor shall:

(a) install a MIST meter on any new installation that is forecast by the distributor to have a monthly average peak demand during a calendar year of over 50 kW; and

(b) have until August 21, 2020 to install a MIST meter on any existing installation that has a monthly average peak demand during a calendar year of over 50 kW.

As a result of the COVID-19 pandemic and following the Emergency Order declared on March 17, 2020 by the Government of Ontario, the OEB provided a temporary extension for electricity distributors in respect of the date for compliance (for part (b) of section 5.1.3 noted above). The temporary extension was implemented through a Decision and Order issued by the OEB on July 23, 2020, in which Schedule 3 of all electricity distributors' licenses were amended, allowing for completion by March 31, 2021.

The Decision and Order issued by the OEB indicated that if distributors required any extension beyond March 31, 2021, they would be required to make a separate application.

Application

Alectra is compliant with DSC section 5.1.3 (a), wherein any new service that qualifies has a MIST meter installed as standard operating procedure. With regard to existing installations (i.e. 5.1.3, part (b)) Alectra has been working diligently towards meeting the requirement for the implementation and installation of MIST meters across its service territories. To this end, Alectra has contracted additional field resources and is working to expand its capacity to implement the required installations. To date, Alectra has been able to successfully implement roughly 9,200 MIST meters across its service territories. However, Alectra still has approximately 1,000 meters that remain to be installed and roughly 2,000 where communications infrastructure requires an upgrade to make the MIST metering effective.

Throughout 2020, Alectra encountered several challenges in the continuation of its program rollout, primarily due to the pandemic, as follows:

- **Supply Constraints** – Global supply constraints delayed delivery of materials (i.e., meters). Delays in the delivery of meters caused Alectra's installation program to stall for a period of time throughout 2020.
- **Staffing Issues** – The pandemic resulted in reduced availability of both internal and external field staff necessary to execute the installation program. For periods of time, stay at home orders and uncertainty over safety conditions caused both Alectra and third-party partners to reduce the availability of staff who carry out the program, either entirely or significantly.
- **Productivity** – Even while the program roll out did recommence, it continued with reduced productivity due to safety measures that were put in place. In particular, the productivity of the program was affected by limitations placed on the type of field work that could be accomplished due to municipal policies and controls that were enacted for periods of time.

In addition, in the Guelph Rate Zone (“GRZ”), virtually all MIST meters have been installed where required and are providing interval data. However, the GRZ Customer Information System (“CIS”) is not capable of billing, consistent with MIST. Alectra Utilities’ plan is to convert these accounts to MIST accounts when the GRZ is incorporated into Alectra Utilities’ Customer Care & Billing (“CC&B”) system for billing and other purposes by July 2022.

For these reasons, Alectra Utilities seeks approval for a further temporary exemption. It requests that the OEB amend its license to exempt it from the requirement to implement MIST metering for all customers to whom the code applies until December 31, 2021. Alectra Utilities also requests that this exemption be extended to July 30, 2022 for the Guelph Rate Zone. Should the implementation of CC&B be delayed, Alectra Utilities will advise the OEB immediately, as such would impact the final set up of the GRZ-related MIST accounts.

Should you have any questions, please do not hesitate to contact the undersigned.

Yours truly,

Indy J. Butany-DeSouza, MBA
Vice President, Regulatory Affairs
Alectra Utilities Corporation