



Burlingtonhydro inc.

Christine E. Long
Registrar
Ontario Energy Board
2300 Yonge Street, 27th Floor
Toronto, ON
M4P 1E4

October 12, 2021

Dear Ms. Long,

**Re: Burlington Hydro Inc.
Application for License Amendment and Temporary Exemption from MIST
Metering Implementation**

On May 20, 2021 Burlington Hydro Inc. (“BHI”) requested the following license amendments and temporary exemptions from the Customer Service Rule Amendments and Metering Inside the Settlement Timeframe (“MIST”) Metering Implementation as follows:

1. An extension of its current license amendment under Section 74(1) of the OEB Act and its temporary exemption from section 2.6.3 of the Distribution System Code (“DSC”) and section 2.6.2 (d) of the Standard Supply Service Code (“SSSC”) from June 30, 2021 to September 30, 2021; and
2. A temporary exemption from Section 5.1.3(b) of the DSC from September 30, 2021 to December 31, 2021.

The rationale for the extension request was that BHI’s Customer Information System (“CIS”) go-live date was delayed due to key project resources being re-allocated from the CIS project to support unplanned policy and pricing changes and the introduction of new customer support programs stemming from the COVID-19 pandemic; and to support continued business operations in light of the challenges imposed by the COVID-19 pandemic.

BHI is dependent on the implementation of its new CIS to:

- i. Implement the Customer Service Rule Amendments; and
- ii. Process the interval reads from the new MIST meters and bill GS>50kW customers on an hourly basis, per section 5.1.3 (b) of the DSC.

On June 24, 2021 the Ontario Energy Board (“Board”) granted both of BHI’s extension requests (EB-2021-0167).



BHI's new CIS is in-service, and as such, BHI confirms it is now compliant with the Customer Service Rules in Section 2.6.3 of the DSC and Section 2.6.2 (d) of the SSSC.

However, certain CIS conversion activities are ongoing as BHI stabilizes its new system and related processes, which have impacted BHI's ability to fully implement MIST metering by December 31, 2021. For the reasons described below, BHI respectfully requests a temporary exemption from Section 5.1.3(b) of the DSC from December 31, 2021 to March 31, 2022 and from Sections 3.2.2 and 3.4 of the SSSC to June 30, 2022.

Status of MIST Metering Implementation:

1. BHI is compliant with the requirement to 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.
2. BHI has begun installing MIST meters on existing installations with a monthly average peak demand during a calendar year of over 50 kW and anticipates having 80% of the required meters installed by December 31, 2021. BHI expects to install the remaining 20% of meters by March 31, 2022.
3. Once the MIST meters are physically installed, BHI will not be compliant with two sections of the SSSC until it modifies its billing processes:
 - a. Some of these customers are currently billed RPP Tiered pricing – once a MIST meter is installed, they need to be billed in accordance with Section 3.4 of the SSSC i.e. billed RPP Time-of-Use (“TOU”) pricing because they now have an eligible TOU meter that is capable of providing data on at least an hourly basis; and
 - b. The remainder of the customers are currently billed the weighted average hourly spot price (“WAHSP”) – once a MIST meter is installed, they need to be billed in accordance with Section 3.2.2 of the SSSC i.e. billed the spot market price (HOEP) because they now have an eligible TOU meter meter that is capable of providing data on at least an hourly basis.

There are several activities which BHI must complete before modifying the billing for customers with newly installed MIST Meters including: CIS programming and testing, recalculating the Net System Load Shape and modifying interfaces with meter data providers. BHI is not in a position to manage these changes within three months of its CIS Go-Live date (July 1, 2021). It is still monitoring transactions and bills for accuracy, dealing with one-off scenarios not captured during testing, training staff, and finalizing best practices/procedures. Compounding these CIS transitional changes is the difficulty to hire and retain resources due to the impact that COVID-19 has had on the labour market.

Customer Impact

557 of BHI's customers are affected by this delay. BHI has neither communicated an upcoming change to metering or billing for affected customers nor are customers aware of a delay in implementation of DSC Section 5.3.1. Billing and metering will be status quo until further notice is provided.





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BHI expects to have installed MIST meters on existing installations with a monthly average peak demand during a calendar year of over 50 kW by March 31, 2022 and expects to bill these customers in accordance with the SSSC by June 30, 2022. As such, BHI respectfully requests temporary exemptions as follows:

1. An exemption from Section 5.1.3(b) of the DSC from December 31, 2021 to March 31, 2022; and
2. An exemption from Sections 3.2.2 and 3.4 of the SSSC for these 557 customers to June 30, 2022.

Yours truly,

A handwritten signature in black ink, appearing to read "Adam Pappas".

Adam Pappas
Manager, Regulatory Affairs
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