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February 3, 2022

Sent by EMAIL, RESS e-filing

Ms. Nancy Marconi
Acting Registrar
Ontario Energy Board
27-2300 Yonge Street
Toronto, ON M4P 1E4

Dear Ms. Marconi:

**Re: EPCOR Electricity Distribution Ontario Inc. (“EEDO”)
Application for an Electricity Distribution Licence Exemption - ED-2002-0518
Provide a Temporary Exemption from Requirements in the Standard Supply
Service Code (SSSC)**

EEDO is requesting from the Ontario Energy Board a temporary exemption on obligations of its electricity distribution license included Section 5.1d – Compliance with the Standard Supply Service Code, specifically, the obligation to offer Time of Use pricing due to a supply chain issue which has resulted in a shortage of advanced metering infrastructure (“AMI”) meters.

LDC Overview

EEDO is an electricity distributor which services residential, commercial and industrial customers in the communities of Collingwood, Stayner, Creemore and the village of Thornbury (the Town of The Blue Mountains) under Ontario Energy Board (“OEB”) license ED-2002-0518, last amended September 12, 2019.

EEDO connects approximately 400 new customers annually, the majority of which are residential.

Background

EEDO has been informed of a supply chain issue leading to the delay of delivery of Sensus/KTI Single phase, form 2S, 240V, 200Amps meters. This has resulted in a delay of shipments that were ordered in both 2020 and 2021.

EEDO has been informed by our meter supplier that the main driver for the delay is a global supply issue of available semiconductors needed to construct the meters.

EEDO has not received confirmation of expected delivery times, but have received projected delivery dates ranging from Q2 2022 until Q4 2022, as the exact timing of recovery from this global shortage is still unknown.

Since being informed of the additional meter delivery timelines, EEDO has explored additional avenues including reviewing contract delivery clauses with the vendor, mutual aid requests within the Ontario LDC community and EPCOR Utilities Inc. (EEDO's parent company). Despite the extensive research, EEDO has not been able to secure additional meters that would be compatible with our existing AMI infrastructure. EEDO has also been informed that there are other Ontario LDC's experiencing a similar issue and there appears to be a provincial shortage in meter delivery.

EEDO is expecting to deplete its current stock of AMI meters by the end of March 2022.

Interim Solution

EEDO has been able to secure a limited supply of 240V, 200 Amps, Form 2S, Itron C1S meters (all approved by Measurement Canada) which would allow EEDO to continue to connect customers. These meters would be read on a manual basis and as a result, EEDO would not be able to offer Time of Use RPP pricing to these customers until the new shipments of meters arrive. EEDO submits that despite the lack of customer choice options available to be offered, this solution would be preferred to delays in connection timing for customers.

EEDO would incur additional costs to verify the meters with Measurement Canada (approximately \$15 per meter) along with potential labour costs for the EEDO's metering team to manual read the meters each month for billing purposes.

EEDO continues to explore other options to resolve the supply constraint.

Application

EEDO is requesting a temporary exemption on obligations of its electricity distribution license included in Section 5.1d – Compliance with the Standard Supply Service Code (SSSC section 1.1.2. and 3.4) from offering Time-of-Use RPP pricing until the Supply Chain issue can be resolved. EEDO anticipates that this would only impact new connections, but may also require a manual read meter to be installed in the event of meter failures should the volumes exceed the existing supply. EEDO is requesting this exemption until December 31, 2022. In the event that the supply chain issue is resolved before the requested date, EEDO proposes to inform the OEB to remove the exemption and revert back to offering qualifying customers RPP pricing options.

Should you require any additional detail or information on this matter, please let me know.

Sincerely,

A handwritten signature in blue ink, appearing to read 'T. Hesselink', with a stylized flourish at the end.

Tim Hesselink, CPA, CGA
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