

LDC INTERROGATORY #18

INTERROGATORY

Reference: Report of John Todd , filed September 26, 2003, Page 3, lines 4 –14:

An “underserved location” is defined as “one in which a customer prefers a form of service that is not available from its existing distributor. For example:

- Residents in a high-rise development where the building is bulk metered but residents prefer to be individually metered so that they can benefit from individual conservation efforts, such as reducing their air conditioning load by setting their thermostat higher.
 - Distribution customers that want different metering technology than that available from their incumbent distributor, such as interval meters that would enable them to choose an energy supplier that offers a rate structure that recognizes the value of individual conservation efforts such as shifting load to off-peak hours (e.g. by doing laundry later at night).
- (a) Would the definition of underserved require unanimity on the part of high rise building tenants in the example above?
- (b) In light of the requirement of section 5.1.5 of the Ontario Energy Board's Distribution System Code, applicable to electricity distributors as a condition of their distributor licences, that "a distributor shall provide an interval meter within a reasonable period of time to any customer who submits to it a written request for such meter installation...", on what basis are the customers described in the second bullet above located in an “underserved location”?
- (c) Please provide a list of any other examples which would constitute an “underserved location”.
- (d) Are any of the services referred to in part (c) not typically available from incumbent distributors?

RESPONSE

- (a) This depends on the circumstance, in new high-rise buildings it is assumed unanimity would exist since the choice to become a resident resides with the



individual based upon the services that building offers. In the case of existing buildings not all tenants need to perceive a building as being underserved. In particular, in multi-unit buildings there are two parties the tenant and the building owner/manager. The ultimate decision as to whether the building is underserved lies with the building owner/manager. Their decision could be made as a consequence of lobbying by tenants or on their own. However, they can not impose the responsibility for charges from individual metering on existing tenants without the tenant's agreement.

- (b) Please see interrogatory response to LDC at Ex. J12, T11, S15.
- (c) Other examples of underserved locations include commercial buildings where tenants share in the cost of electricity on a leased area basis rather than their actual contribution to electrical demand. Underserved locations even exist where individual unit metering does exist but is used to only apportion a bulk bill. In such circumstances the unit occupant is denied access to the retail market as well as not receiving any direct benefit to their load shifting.
- (d) Typically these services are not available from the incumbent LDCs although there are some that are providing sub-metering through affiliates however as mentioned in (c) Wirebury considers this to be area underserved.

