



November 26, 2004

Mr. John Zych  
Board Secretary  
2300 Yonge Street, 26<sup>th</sup> floor  
Toronto, ON M4P 1E4

Via E-Mail to BoardSec@oeb.gov.on.ca (Originals to follow via courier)

Re: Draft Smart Meter Implementation Plan – RP-2004-0196

Dear Mr. Zych:

As an Electricity Distributor Association (EDA) member and a Local Distribution Company (LDC) Brantford Power (BP) supports the comments in the EDA's response on this matter and wishes to provide additional comments herein.

Comments Related to Specific Sections:

Section 2.1.1 – BP would like to clarify that customers over 50 kW peak demand could have either mechanical (demand pointer) or electronic meters on single and polyphase services.

Section 2.1.2 – BP and many other LDC's do not treat interval meters for groups 2 and 3 differently. That is, we bill off the load profile (interval data) often down to a 5-minute resolution. It is rare, if it happens at all, that an interval meter is billed demand from the meter register as opposed to the interval data. BP does not see the need to separate groups 2 and 3 from a technical point of view, perhaps only from an implementation timeline (larger first). The existing technology used for group 3 (interval meter with an analogue phone line) is sufficient for group 2. BP will comment on this further in Section 4.1 below.

Section 2.5.2 Table B – Customer Group 2 and 3 reference to 'three-phase metering' should be removed and only be '>50KW customers'. Also, the Resources Used should include 'qualified Meter Technician Apprentice'. Group 1 reference to 'single phase metering' should be removed and only be 'Residential and GS<50kW'. Also, the Resources Used should include 'Certified Meter Technician and qualified Meter Technician Apprentice'. There are many single-phase meter installations that require this.

Section 2.5.4 - Address funding for procurement and installation of meters ahead of a Final Implementation Plan. Valuable time will be lost if there is uncertainty as to a



mechanism to recover these costs, as was most recently demonstrated with Distributor Conservation and Demand Management (DCDM) plan submissions and implementations. BP does not see a need to have an implementation coordinator review of meters to be installed on services between 50 and 200 kW.

Section 2.6.2 – BP does not agree with the statement that costs will not increase significantly with early installation of meters. LDCs that pay for the telephone line costs can pay upwards of \$50/month (\$600/year) per meter point; which is almost the cost of the interval meter each year. Furthermore, the reference to installing meters within 4-6 weeks of a request needs clarification. The physical meter installation lead-time is not the issue. The LDC or customer must have the phone line installed and tested and the LDC must then pick a date to bring the interval meter into the billing system. The total lead-time for this can be 2-3 months. Finally, allowing the customer to ask for enhanced functionality negates the purpose of streamlining the procurement process and meter/system selection. Maintaining 'special' meters in our systems is very costly and often prohibitive to the customer. Also, time spent on these 'specials' will take away from deploying the majority of the meters.

Section 3.3 – The statement that 'The largest commercial/industrial customers have interval meters that record hourly usage...not be stranded' needs clarification. As mentioned previously, interval meters are mostly billed demand based on the interval data in 5 or 15-minute intervals, not hourly.

Section 4.1, Table E – Customer Groups 2 and 3 would require the same Billing Quantities and Meter Data Collection Requirements to allow LDC's to bill demand consistently and per existing methods (kWh, kW, kVA/kVAR with 5 or 15 minute resolution). To bill demand from interval meter data typically kW and kVA or kW and kVAR are both measured in the same meter and no less than 15 minute resolution. The reasoning for higher resolution is to capture the true impact of demand over durations much less than 1 hour. For the purposes of the final draft, BP suggests that demand billing be further investigated and understood.

#### General Comments:

BP would like to make a general comment on the impact of shifting resources to Smart Metering deployment at a time when existing IMO-required wholesale meter upgrades are severely strained. This impact should be reviewed further as LDC's will now be more challenged to meet IMO market rule obligations. The main causes for the delay of wholesale meter upgrades should be investigated with resources put in place to ensure a more timely completion.



For data presentment, it is difficult to understand how telephone (IVR) based access to hourly or sub-hourly pricing and usage data (at least 48 pieces of information per day) can be feasible. This is particularly true for customers that will continue to be billed on market pricing where the preliminary prices are not provided/available next day and are subject to change.

A time standard (Daylight Savings or Standard Time) should be chosen for data presentment. The time standard has been and will continue to cause some confusion between the Spring Forward and Fall Back period. This is when the IMO is one-hour 'behind' local Eastern Daylight Time (EDT). The IMO market functions on Standard Time while many LDC's have billing determinants (ie. "7-7 demand") that are based on local EDT time. Consideration should be given to this, as it will be difficult for most consumers to see their data/pricing shifted by an hour at different times of the year.

We thank you for the opportunity to provide our comments on this matter as it is poised to have one of the most significant impacts on our industry in history.

Sincerely,

Peter Hajek, P.Eng.  
Manager – Metering & Settlement