



November 26, 2004

**DELIVERED BY HAND**

2 Lansing Square  
Toronto, Ontario  
M2J 4P8 Canada

Mr. John Zyck, Board Secretary  
Ontario Energy Board  
2300 Yonge Street, 26<sup>th</sup> Floor  
Toronto, Ontario M4P 1E4

Dear Mr. Zyck;

**Re: RP-2004-0196 Smart Meter Initiative  
Draft Implementation Plan**

EPCOR is pleased to have been invited to participate as a member of the working group looking at this important initiative and offers the following additional comments on the draft Smart Meter Implementation Plan ("SMIP") as circulated to stakeholders on November 9, 2004.

**Section 2.2.3 and Section 2.3 Implementation Coordinator**

With regard to the Implementation Coordinator, it is clear that such a position would play a valuable role in the successful implementation of the SMIP. However, at this point we do not see that the powers and responsibilities of the Implementation Coordinator are clearly defined. These need to be carefully delineated prior to filling this role and initiating the SMIP to ensure the minimization of conflicting or overlapping responsibilities.

**Section 2.3 Implementation Timeline**

EPCOR agrees the bulk of the responsibility for the implementation of the SMIP falls to the OEB and LDCs however, we respectfully submit that Retailers and/or Energy Service Providers (ESPs) have a major stake in the implementation of the program. As such, Retailers and ESPs should be included in future discussions of the SMIP, and especially those discussions related to the Change Management.

Change Management, as defined in the SMIP specifically identifies the "overall communication plan". Retailers currently have competitive contracts with a significant portion of the Ontario marketplace. In addition to having our own customer information systems prepared to manage changing data flows and schemas, we also have an interest in ensuring that the information that is being delivered to our customers around the SMIP is clear and accurately reflects the impacts to our customers' relationship with us.

At a minimum the SMIP should ensure that Retailers receive advance notice of each LDCs' deployment plan, regular progress updates and most importantly, 60 days advance notice of specific meter deployment to our enrolled customers.

**Section 2.4.3 Business Cases for Enhanced Functionality and  
Section 3.4.4 Enhanced System Features**

Retailers may suggest a meter with additional features in line with customer's usage pattern. The implementation plan does not specifically address this requirement. The final plan should suggest guidelines for how these types of requests will be accommodated.

While it is understood that the objective of the SMI is to lessen demand, we feel that LDCs are engaging in competitive services which in a mature market; Retailers and ESPs would be providing. The LDCs' role should be limited to providing the meter and access to interval data as currently contemplated. Any enhancements to either the meter or the corresponding systems should be limited to improving the Distributors efficiency in delivering these services otherwise requiring the Board's specific approval subject to the test of stakeholder scrutiny and comment.

**Section 2.5 Deployment**

EPCOR supports with the deployment program as well as priorities identified in the SMIP.

**Section 2.7 Key Success Factors**

The steering committee as proposed will play an important role. However, this position would be strengthened significantly were it expanded to include the representation of the Retailer community. As previously stated, the SMIP will have a dramatic impact on both our existing customers and the development of our new products and services. The SMIP needs to be sensitive to the important role that smart meters and Retailers will play in ensuring that the competitive aspect of the Hybrid market (as contemplated in Bill 100) is achieved. Failure to include Retailers for regular consultation in key areas of market evolution such as SMIP will present a barrier to reaching this goal.

**Section 3.4 Cost Recovery Principles**

The benefits accruing due to smart metering will trickle down to all customers with or without smart meters. As such, EPCOR supports the cost recovery plan as described in Section 3.4.1, that is, that the recovery of program costs should be from all customers and should not be limited only to customers with smart meters.

#### **Section 4.5 Customer Information**

EPCOR submits that in order for the SMIP to achieve the best possible results, consumers need 'near' real-time access to usage and pricing data. Having consumption data available a day after the power has been consumed will not allow customers to respond to market based pricing signals. The suggested approach does not support the Minister's previously stated objective of allowing customers the opportunity to know the price of power before they use it. It also withholds from consumers the opportunity to better control their costs and positively impact system operations creating by shifting load or reducing overall consumption. This is clearly an important aspect of the SMIP and deserves some additional consideration to ensure that we achieve the desired results.

#### **Section 4.6 Information Detail to Third Parties**

Neither Retailers nor consumers should be required to incur any additional costs for accessing their interval meter data from the LDC. Access to interval data will increasingly become an important tool for helping customers to better assess their consumption patterning leading to informed decision making and demand response. Consumers should be allowed to designate access to this data to an agent or retailer and their designated representative should be assured access to the data on the same terms as the consumer.

The foregoing summarizes our high level observations regarding the November 9, 2004 draft of the Smart Meter Implementation Plan. We would be pleased to provide additional information around any of the comments addressed herein and would similarly be pleased to participate in the ongoing discussions around this important issue.

Yours truly,



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