



**Ontario Energy  
Association**

November 26, 2004

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

Dear Mr. Zych:

**Re: RP-2004-0196**

The Ontario Energy Association appreciates the opportunity to comment on the *Smart Meter Implementation Plan, Draft Report of the Board*. We commend the Board on a draft plan that is comprehensive, strategic and addresses key concerns, including costs and logistics. We are pleased to offer the following recommendations to enhance the implementation plan:

#### **Consultation Timeline**

The timeline allowed for stakeholders to review the document and provide their comments is very tight. This is apparently the final opportunity for stakeholders to provide input on this important, costly and complex energy conservation initiative the success of which will significantly underpin public acceptance of changes in electricity prices and confidence in the new electricity system. The OEA recommends that the Board accept comments until at least December 10, 2004.

#### **Early Adopters**

We support the phased rollout of smart meters, but recommend that the plan also encourage early adopters in any rate class to obtain smart meters ahead of the scheduled implementation.

#### **Additional Functionality:**

The Minister's directive asked the Board "to consider and identify additional functionality for smart meters, on either a mandatory or optional basis." The requirements for the basic smart meter system should not preclude the addition of features and enhancements, such as two-way communication, real-time display monitors, net metering and other value-added features for energy consumers. Functionality can



help empower customers with tools available in the marketplace to effectively manage their consumption.

### Commercial Feasibility

With regard to the recommended requirement that smart meter systems have at least 10,000 meter points in operation, we are concerned that this requirement would exclude some viable technologies. The OEA suggests that the proposed pilot projects be used to qualify new technologies. LDCs are usually free to choose whatever billing, settlement, or VEE systems they see fit, based on prudent risk analysis.

If the minimum meter points criterion must be applied then the Board should clarify whether the 10,000 points must be in operation in Canada or may they be in operation in North America or globally?

### Federal Approvals

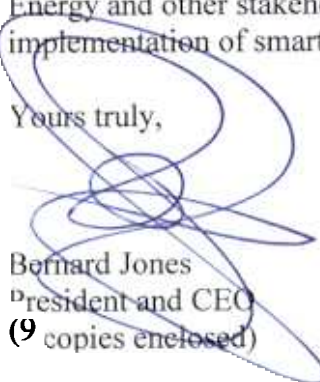
We recommend that if it has not already done so, the Board should commence discussions with Measurement Canada on the smart meter approval process. The length of time required for Measurement Canada approvals could be a concern even where approval is sought only for a single technology. More time might be involved where a number of technologies are seeking approvals in the same time frame, and where communication devices are integrated into approved meters.

### Pilot Projects and DSM Funding

The Board should clarify as soon as feasible whether or not pilot projects would qualify for DSM funding.

Many members of the OEA—utilities, meter manufacturers and providers, and companies offering a range of services—will be responsible for implementing smart meters. The OEA looks forward to working in partnership with the Board, the Ministry of Energy and other stakeholders in ensuring the effective, efficient and successful implementation of smart meters in Ontario.

Yours truly,

  
Bernard Jones  
President and CEO  
(9 copies enclosed)