Ontario

Energy

Savings

Corp.

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November 26, 2004

John Zych
Board Secretary
Ontario Energy Board
P.O. Box 2319
2300 Yonge Street
26th Floor
Toronto, ON
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Dear Mr. Zych,

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

On November 9 2004 the Ontario Energy Board ("OEB", the "Board") issued the *Smart Meter Implementation Plan – Draft Report of the Board*. By way of Notice, dated November 9 2004, the Board invited comment on the Report from interested parties. The Board requested comments no later than November 26 2004.

Ontario Energy Savings Corp. ("OESC") provides the attached written submission in accordance with the Board's direction thereto.

Sincerely,

Gord Potter
Director, Regulatory and Utility Management

ATTACHMENT

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IN THE MATTER OF

RP-2004-0196 Smart Meter – Draft Implementation Plan – Report of the Board

WRITTEN SUBMISSION OF
ONTARIO ENERGY SAVINGS CORP.
("OESC")

DATED: November 26, 2004

On November 9, 2004 the Ontario Energy Board (the "Board") issued to industry stakeholders a draft implementation plan for smart meters (the "Report"). OESC submits this written representation in response to the Board invitation to participate in this public consultation.

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1. The Report provides a clear understanding of both the magnitude of activities to be undertaken and the requirement for coordination that this project will demand. OESC agrees with the recommended installation approach by customer class/new homes and endorses the requirement for a central coordinator as outlined in the Report.

2. OESC supports the requirement that all meters must be able to record and report, in an automated fashion, consumption for each hour of the day. This approach provides, among other considerations, for cost effectiveness and benefits such as long term savings of the costs of manual meter reading and efficiencies gained by having actual meter readings versus estimated reads.

3. Using actual consumption readings will i)improve the accuracy of consumer billing thereby reducing billing errors, ii)reduce the requirement and costs associated to the current practice of billing on estimated reads (which requires retroactive adjustments to past billings upon receipt of infrequent actual readings –often referred to as 'cancel-rebilling' of accounts), and iii), OESC submits that the receipt of actual meter readings in near real-time will facilitate a shift from the current extended timeframes required to enroll consumers in retail choice programs to that of near real-time switching, thereby removing this existing impediment to choice that exists today.

4. Notwithstanding possible cost considerations unknown to OESC, it would appear to be desirable to have two-way communication established as a standard for smart meters (contrary to the Report which suggests one-way communication). This would allow for enhanced DSM or conservation-related services or equipment to be utilized.

5. OESC supports the recommendation that agents acting on behalf of consumers (i.e. retailers or energy service companies) must have access to their customers' meter data. Further OESC submits that access to meter consumption data must be provided for in a standardized, mechanized format and on standard platform/system architecture across the province. Other access options may be offered or available but all providers and local distribution companies ("LDCs") must, at minimum, provide the data or access to the data per the standard. Industry standards should be designed through the OEB EBT Standards Working Group, or a similar collaborative, working under the auspices of the OEB. Standards defined should be documented and approved by the Board.

6. At a minimum, consumption data should be provided in hourly increments even where the customer is currently not billed hourly. Agents acting on behalf of consumers should be entitled to receive such data under the same terms and conditions as the customers themselves and therefore should not be subject to any additional fees for receiving or accessing meter data.

7. Consumption data should be available in near real time. OESC is of the belief that the current recommendation (next day data availability) would impede consumer efforts to conserve or manage their load. Consumers need access to the consumption data as close to real-time as possible in order to assess and action conservation or DSM measures. Providing the data to consumers on the next day prohibits consumers from acting quickly to pricing and consumption patterns.

8. LDCs, retailers, energy service companies or meter providers may provision services or devices to consumers to support conservation and/or DSM measures. However, the establishment of such devices or programs by any party should not preclude the consumer from choosing a supplier for electricity nor interfere with the energy supplier's receipt or access to the meter data records for that consumer.

OESC respectfully requests the Board's consideration of the positions put forward in this submission for inclusion to the final Implementation Plan and thanks the Board for the opportunity to comment in this consultation.