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To:	**Ontario Energy Board**	**From:**	**Constantine Eliadis**
Attn:	**Peter O'Dell**		
Fax:	**416.481.1967**	**Pages:**	**3**
Date:	**Friday, January 10, 2005**	**CC:**	
Re:	**RP-2004-0196 – Comments regarding Two-way Communication**		

Dear Mr. O'Dell

Kindly see attached

Ontario Energy Board
Smart Meter Implementation Plan
Comments Regarding 2-Way Communication – January 10, 2005

Introduction

Our position is that two-way communication be a mandatory requirement as reinforced in our previous comments. The ability to communicate with the end-use meter device is fundamental every aspect of system operation. To specify anything less is to acknowledge that the objective of this multi-billion dollar initiative is nothing more than the elimination of the few thousand manual meter readers who currently collect meter data and arguably the collection of more granular meter data. We believe the Minister's objectives reach far beyond these tactics and can only be achieved with technology that is enabled to communicate from end-to-end.

Question 1

Simply automating manual meter reading creates little or no value. Two-way communication allows consumers to actively participate with information in hand, in energy usage decision making; and it enables smart meter operators to make changes to configurations or request data as needed to support demand response, reliability response and customer service requests. Two-way communication supports the potential delivery of usage or pricing data to a consumer display/thermostat as well as the ability to synchronize time from a central reference. It can also reduce the cost of future demand response use, controlling devices during peak conditions. Without two-way communications to the meter, the following meter capabilities cannot exist:

- Re-configuration of the meter or any parameters without visiting the site (a requirement in the current document)
- Execution of any system/device-level diagnostics (otherwise precipitating a site visit)
- On-demand reads (for final reads, or changes in account information)
- The ***direct*** delivery of information regarding pricing to the customer
- The direct communication of load limiting instructions

If it is acknowledged that this project presents a "once-in-a-technology lifecycle opportunity" to visit every residence and business in the province and replace a device and that the labour portion of the cost is the piece critical to leverage, then there is only lost opportunity in installing a device capable of 2-way communication.

Question 2, 3 and 4

This network would be a third party service, bound by a service level agreement and won by a competitive bid process. There are multiple potential carriers for such a service. The LDCs should have no interest in the construction or operation of such a network.

Question 5

The use of industry standard protocols is an essential component in the design of a system capable of having multiple device technologies (in this case meter devices) interoperate on a single network. Proprietary technologies, even those that are prepared to share protocols, ultimately contributes to a less stable, less reliable network, whose operation cannot be guaranteed. To invoke a simple analogy, developing a network based on a proprietary communication protocol would be like having an application running on a PC computer that is not Windows compatible. Its operation is an unknown,

regardless of the amount of customization, unsupportable by a technician and therefore unsuitable for use on the chosen platform. It is understood that a proposed network will have a diverse population of devices operating on the network, and therefore the use of an open protocol standard is the fundamental requirement.

END