



August 22, 2004

Peter H. O'Dell
Acting Board Secretary
Ontario Energy Board
P.O. Box 2319
2300 Yonge Street
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Toronto, ON M4P 1E4

RP-2004-0196 – Ministers Directive on Implementing Smart Electricity Meters in Ontario

Dear Mr. O'Dell:

Blue Line Innovations Inc. is pleased to respond to the Ontario Energy Board's staff discussion paper respecting smart meters. A carefully designed smart meter implementation plan will help reduce consumption, save money for households and moderate the need for provision of new supply.

Blue Line Innovations recognizes that efficient use of energy is a desirable public goal. The provision of relevant information and tools to enable customers to manage their demand will help meet this goal. Different types of meters and technologies are available to help consumers become more efficient with their electricity consumption. Some are more costly and require more significant changes to the existing infrastructure than others.

It is important to acknowledge that different customers will benefit from smart meters at different levels. The best approach to implementing smart meters in Ontario is to understand the needs of each customer segment and provide them with the appropriate solution that is most cost effective.

Blue Line Innovations is the developer and provider of a smart technology that provides real-time electricity consumption information to residential customers. Domestic energy use studies have demonstrated that real-time feedback yields energy savings of 10-20%. The higher savings are realized when a tabletop energy display device is used.

Blue Line's PowerCost Monitor:

As unobtrusive as a small electric clock, PowerCost Monitor is a powerful direct feedback device for domestic energy consumers. It is a stand-alone customer feedback device that provides immediate feedback on usage by way of a customer display unit.

- The PowerCost Monitor technology consists of two discrete functional units:
 1. A detection unit is affixed to an existing household electromechanical utility meter with a simple ring clamp. This tracks the energy consumed by counting turns of the meter disk. This is the only component that will be in direct physical contact with the utility's electromechanical meter but the clamp mechanism allows it to be attached to the outside of the meter glass. It can also be quickly detached without making any changes to the existing meter.
 2. The display unit, located inside the home, receives a wireless signal from the detection unit and displays the information in real time for the end user. This unit displays information for the homeowner in various forms: \$/hour, KW, CO₂ , KWh, \$/Month, CO₂/Month, etc.
- Since, the PowerCost Monitor attaches to existing electromechanical meters, utilities do not have to replace existing meters in order to send a price signal to consumers. Furthermore, customer's service is not disrupted and an electrician is not required to install it.
- The PowerCost Monitor can be installed at a fraction of the cost of interval meters or AMR solutions. This is significant given that the benefits of real-time feedback technology appear to be higher than those associated with other types of technologies.
- The utility will maintain control of customer metering and, as a result, any potential complications of dealing with third party meter service providers can be avoided.
- The 800,000 meter installation target by December 31, 2007 is ambitious. However, the PowerCost Monitor's design and cost supports large-scale implementation. The PowerCost Monitor takes less than 15 minutes to install and because it is a very simple task, some consumers may choose to install it themselves.

The OEB's plan should be developed in such a way that cost-effective demand side management solutions promote a range of cost-effective, smart technologies. These solutions should offer high value to customers and customers should have choices.

We believe that we have raised important and valuable points for OEB's consideration and we hope that a small delay in our submission will not be an impediment to a fuller consideration of the points raised. We would be pleased to provide additional information or clarification and we are willing to provide oral testimony if that is deemed appropriate.

Yours truly,

Maurice Tuff
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