



February 7, 2014

Board Secretary  
Ontario Energy Board  
27th Floor/ P.O. Box 2319  
2300 Yonge St.  
Toronto, ON M4P 1E4

Dear Ms. Walli,

**Re: EB-2013-0311 - Proposed Amendments to the Distribution System Code - Interval metering for GS>50kW customers**

Halton Hills Hydro Inc. (“HHHI”) thanks the Board for the opportunity to comment on the proposed amendments to the Distribution System Code (“DSC”) as it concerns General Service greater than fifty (50) kW (“GS>50”) customers and the installation of interval metering.

HHHI currently has one hundred seventy-two (172) customers with a monthly average peak demand during a calendar year over fifty (50) kW. Of those customers, twelve (12) have a monthly average peak demand during a calendar year over one thousand (1,000) kW and are interval metered. In addition to the twelve (12) accounts, HHHI has thirty-one (31) customers between 50 kW and 1000 kW who are currently interval metered, billed on hourly usage, and fifteen (15) customers who are Regulated Price Plan (“RPP”) eligible and are billed the RPP Tiered price. The remaining one hundred fourteen (114) customers are billed commodity on the Net System Load Shape (“NSLS”).

While HHHI has no objections to the proposed amendments in theory, HHHI would ask the Board to clarify a few questions that have resulted from the proposed amendments.

Firstly, while the Board expects the installed meters to communicate through the existing Advanced Metering Infrastructure (“AMI”), the AMI was designed to communicate with smart meters (as defined in the Retail Settlement Code (“RSC”). As defined in the RSC, a “*smart meter*” means a meter that is part of an advanced metering infrastructure that meets the functional specifications referenced in the Criteria and Requirements for Meters and Metering Equipment, Systems and Technology Regulation (Ontario Regulation 425/06). The RSC defines an *interval meter* as “a meter that measures and records electricity use on an hourly or sub-hourly basis”. HHHI’s current smart meters qualify as interval meters as defined in the RSC, however, section 3.4 of the RSC states “[u]ntil the metering evolution period end date, a smart meter shall be treated as a non-interval meter”. For the proposed meters to be installed and communicate with the AMI, the metering evolution period end date must be declared.

Secondly, HHHI's current interval meters do not have the capability of communicating through the AMI. Upon brief investigation, HHHI found AMI compatible meters that would also measure peak kW and kVA as well as kWh, however, the cost of these meters is much greater than the cost of the original smart meters. HHHI would also appreciate clarification as to whether the Board expects that all GS>50 customers would be billed Transmission Network charges based on the 7am - 7pm peak demand as are the larger interval meters.

Thirdly, HHHI would be appreciative if the Board could address whether Local Distribution Companies will be required to provide a web presentment for the proposed meters, similar to the requirement for current smart meters. Additionally, it would be of value if the Board could provide insight on the possibility that these interval meters would need to flow through the MDM/R.

Fourthly, the Board states "[c]ustomers may experience an increase or decrease in their electricity charges as a result of moving to hourly or, for those greater than 50kW customers that are eligible for the Board's Regulated Price Plan, TOU pricing based on actual consumption". HHHI recognizes two (2) situations where a customer could have a demand greater than fifty (50) kW and still be RPP eligible. The first situation would be a GS>50 customer who's annual consumption (kWhs) does not exceed 250,000 kWhs. In this case, the customer is RPP eligible and is currently billed the RPP Tiered rates. HHHI is unsure if the Board intends for these customers to continue to bill the RPP Tiered pricing, or whether the Board expects these customers will be billed the RPP Time of Use rates. The second situation would be GS>50 customer with an annual consumption greater than 250,000 kWhs that is designated as RPP eligible as per the most recently amended version of Ontario Regulation 95/05. These customers are multi-unit residential accounts (apartments and condominiums) and billed RPP Tiered pricing using the number of declared units to calculate the consumptions billed at the first tier. Again, HHHI is unsure if the Board intends for these customers to continue to bill the RPP Tiered pricing, or whether the Board expects these customers will be billed the RPP Time of Use rates. Clarification of the Board intentions in these matters would be appreciated.

Finally, the proposed amendment of section 5.1.3 of the DSC states: a MIST meter is to be installed for customers with a monthly peak demand during a calendar year of over 50 kW. The proposed amendment does not formalize the Board's intentions that the MIST meters will communicate with the AMI. The current HHHI interval meters are not able to communicate with the AMI and have their own communication system (usually a dedicated phone line at a cost to the customer). HHHI would like clarification from the Board concerning customers who currently have an interval meter. Does the Board expect that every GS>50kW customer will have a MIST meter capable of communicating with the AMI or would the Board expect that current interval metered customers would be expected to retain their meter and continue to pay communication fees?

HHHI looks forward to continued discussion related to the installation of MIST meters on General Service greater than fifty (50) kW accounts.

Any additional questions or clarifications can be directed towards Tracy Rehberg-Rawlingson, Regulatory Affairs Officer, Halton Hills Hydro Inc., (519) 853-3700 extension 257, [tracyr@haltonhillshydro.com](mailto:tracyr@haltonhillshydro.com).

Respectfully submitted,

*(Original signed)*

Tracy Rehberg-Rawlingson  
Regulatory Affairs Officer  
Halton Hills Hydro Inc.

Cc: Arthur A. Skidmore, President & CEO  
David J. Smelsky, CFO