



London Hydro
111 Horton Street
P.O. Box 2700
London, ON
N6A 4H6

October 27, 2015

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
P.O. Box 2319
2300 Yonge Street, 27th Floor
Toronto, ON M4P 1E4

**Re: Application to amend electricity distribution licence ED-2002-0557
Request for continued date extension as approved in EB-2014-0292**

Dear Ms. Walli:

London Hydro Inc. ("London Hydro") herein formally requests to continue the OEB approved temporary date extension to section 5.1.3 a) of the DSC. This section requires distributors to install a MIST meter on any new General Service greater than 50 kW (GS>50) installation effective on or after August 21, 2014. On December 18, 2014 the OEB approved amendment (EB-2014-0292) to London Hydro Inc.'s Electricity Distribution Licence (ED-2002-0557), specifically Schedule 3 of the licence to reflect an exemption from the requirement of section 5.1.3.a) of the Distribution System Code. This exemption is currently set to expire on December 31, 2015.

London Hydro is actively working towards the implementation of these new requirements. Currently transformer rated metering accounts are already well underway. Any GS>50 metering that have a cabinet are already being setup as Interval and London Hydro is proceeding with existing customer conversions.

It is the self-contained metering where London Hydro still does not have a full solution. London Hydro are hopeful that there will be a cellular wireless solution by January 2016, but as London Hydro has not received the meters as of date of writing, London Hydro cannot guarantee meeting the December 31, 2015 deadline.

London Hydro is concurrently looking at three options for this set of metering:

A) Cellular Bell enabled Elster Wireless WIC meters.



- B) Sensus Enhanced Supervisor Message (ESM) meters. Sensus is helping London Hydro do a RF coverage study that may require more TGB towers and system integrations.
- C) 1.8GHz Proof of Concept. London Hydro is working with IBM to plan a communications alternative to the above.

Given that these options are not 100% in place, London Hydro is requesting additional extension to ensure London Hydro can be fully compliant. London Hydro proposes that the OEB allow a further temporary extension to December 31, 2016.

This requested extension would allow London Hydro the time necessary to successfully propose realistic options to London Hydro management and to allow for execution and implementation of the amendments to the Distribution System Code. In particular, this extension would provide London Hydro the ability to ensure the proper integration and testing of the accepted architecture. London Hydro would note that the above mentioned code amendment impacts not only the meter reading system, but also the billing and settlement systems.

London Hydro has identified that 1080 existing customers are to be converted and have effectively road mapped a conversion plan schedule to successfully integrate the Boards requirements under section 5.1.3 b) and meet the August 21, 2020 deadline.

London Hydro respectfully requests that the Board acknowledge and accept our proposed date extension.

Respectfully yours,

A handwritten signature in blue ink that reads "M Benum".

Martin Benum, CPA, CMA, BBM
Director of Regulatory Affairs
Telephone (519) 681-5800 ext. 5750
Fax (519) 661-2596
benumm@londonhydro.com