



London Hydro  
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December 1, 2015

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

**Re: Application for Extension of Temporary Exemption from DSC Section 5.1.3 (a)  
EB-2015-0289**

Dear Ms. Walli:

Please find attached our response to Board Staff interrogatories.

If you require any further information, please contact the undersigned.

Respectfully yours,

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

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Director of Regulatory Affairs  
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1. In your 2014 application for temporary exemption from section 5.1.3(a) of the DSC you have stated that the most efficient and cost effective solution has been found by London Hydro and delay in implementation is simply caused by timing requirements set by the manufacturer to develop the MV90 interface. The interface was expected to be available by the end of Q3. However, in your latest application you have stated that London Hydro is still looking at three options.
  - a. Please provide reasons for looking into additional options.
  - b. Please identify timelines for implementation of each of the potential options.

**London Hydro Response:**

London Hydro is still considering the three options as none of the options are fully available at this time. The three options are:

- 1) Extend the smart meter system to serve this rate class. As mentioned above an MV90 Interface would need to be developed. However, a main obstacle for this solution is the available radio bandwidth of the smart meter system. It was only designed to support the volume of smart meter data. Today, the smart meter vendor has been engaged to perform a propagation capacity study to see what additional radio tower investments would be required to make enough radio bandwidth available to support these interval meters. This solution would realistically be in service for 2018.
- 2) London Hydro is considering replacing elements of its smart meter system due to obsolescence and end-of-life of vendor support. In doing so, future upgrades may be made to include these meter communications as a technical requirement. However, this may take several years to build.
- 3) Using public carrier cellular networks is the third option. London Hydro had purchased some meters in the past but these were on old 2G (second generation) cellular networks. A new 3G cellular solution was presented by a vendor this summer (2015) and London Hydro has been actively working with the Meter Vendor to test and integrate these meters with our MV90 system and assist the Meter Manufacturer and the Cellular Operator to work together for a solution. It is expected that this solution will be available in Q1 of 2016 and will allow deployment of the meters in Mid-2016.

2. Please identify how meeting of the requirements set out in section 5.1.3 (a) of the DSC impacts the billing and settlement systems.

**London Hydro Response:**

By utilizing the option 3) above (cellular) there would be no functional impact to the billing and settlement systems. There would be additional volume of MIST meters, in effect tripling the number of meters using the MV90, ODS (Operational Data Store) and SAP billing systems. The ultimate removal of the demand meter class could also be a change, but is not deemed to be significant. The options 1) and 2) presented above would require some interface and head end changes that are deemed non-trivial and have not fully been scoped and estimated.

3. What is estimated financial impact on the customers affected by delayed implementation of interval metering?

**London Hydro Response:**

The delay in implementing the interval metering is dependent on how the customer uses electricity. For a customer that uses power during off peak times, they would not be able to take advantage of the HOEP spot market rates. However, many of London Hydro's demand customers are day time businesses and thus are likely to benefit from estimated NSLS averaged rates. In order to mitigate this change, London Hydro has developed and is encouraging customers to use our Interval Data Center web data portal to see their data and manage their energy. The sooner we can read interval data, the sooner they will be able use this tool to manage their electricity.