EDA

The Voice Of Ontario's Electricity Distributors

March 7, 2006

Mr. John Zych
Board Secretary
Ontario Energy Board
P.O. Box 2319
2300 Yonge Street, Suite 2700
Toronto, ON M4P1E4

via email to BoardSec@oeb.gov.on.ca and by courier

Dear Mr. Zych:

Re: Comments on Proposed Amendments to the Standard Supply Service Code: RP-2004-0205

The Electricity Distributors Association welcomes the opportunity to comment on the OEB's proposed amendments to the Standard Supply Service (SSS) Code.

Deferral of the implementation of mandatory Time-of-Use (TOU) pricing beyond May 1, 2006 is a helpful accommodation. Many LDCs have expressed their concerns regarding the requirement to meet the timeline for billing requirements for smart and interval meter accounts beginning May 1st. Distributors have expressed concerns over the fact that the functional specifications for Meter Data Repositories (a key component of the overall Smart Meter framework) have not been finalized and the significant bearing that the Repositories could have on the TOU aggregation for billing.

Many of the design details of the smart meter system that still need to be determined have a bearing on the processes involved in facilitating TOU billing. In particular, the functional specifications of Meter Data Repository(ies) and the timeline for getting the repository(ies) operational that have a significant bearing on the aggregation process for TOU billing, have yet to be finalised. Implementing TOU billing without a Smart Meter framework in place, as an interim solution to meet the TOU billing deadline, could mean that LDCs may have to allocate resources to redo or even abandon some of the work already completed.

The EDA supports the OEB proposal to amend the SSS code that essentially removes the mandatory requirement to bill interval metered RPP eligible customers under the new TOU pricing structure commencing May 1, 2006.

Please direct any questions or comments to Guru Kalyanraman at 905.265.5334 or at gkalyanraman@eda-on.ca.

Yours truly,

Guru Kalyanraman
Analyst

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