



1. The DOE has not provided any documented costs or advantages to AMI metering. i.e- NO BUSINESS CASE!
2. The stated goal is to “shift load” to off-peak hours; but Alberta already has the largest percentage of off-peak load (average/peak) of any province or state in North America at 80%.
3. Another stated goal is to shift load from expensive hours to less expensive hours, but in Alberta the expensive hours are NOT caused by demand, but by supply: the wind conditions or by conventional generators being “down” for a variety of reasons. Shifting from day-time to night-time would often mean shifting from less expensive to more expensive hours!
4. Large industrial users already have time-of-use metering. These represent 65% of the load. The remaining load is relatively inflexible (farm and residential use) and would have negligible effect on overall demand patterns.
5. Estimated costs of up to \$2,000 per meter. With 1.6 million meters in Alberta, this amounts to \$3.2 Billion dollars for the province.
6. Ongoing I.T. costs would be extremely expensive- especially when these systems would need to be maintained by smaller providers because the cost would be shared amongst a smaller customer base. At one read per hour, we are talking about 1.15 Billion ‘reads’ per month in the province.
7. AMI has never been implemented anywhere in the world without extensive government subsidies.
8. There are cheaper alternatives to achieve the stated goals! AMR is already virtually implemented in Alberta. ATCO, Fortis, and many REA’s already have automated monthly meter ‘reads’. In-home devices are already available for less than \$100.00 to inform interested consumers as to what their consumption is at any time of the day or night.