

Janet Fraser

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May 27, 2011

Ms. Alanna Gillis
Acting Commission Secretary
British Columbia Utilities Commission
Sixth Floor – 900 Howe Street
Vancouver, BC V6Z 2N3

Dear Ms. Gillis:

**RE: British Columbia Utilities Commission (BCUC)
British Columbia Hydro and Power Authority (BC Hydro)
Street Lighting Tariff Application - Compliance with BCUC Order No. G-79-11**

Pursuant to BCUC Order No. G-79-11, BC Hydro is filing its final submission concerning its Street Lighting Tariff Application (**the Application**). The Application was filed with the BCUC on April 12, 2011 and requested various changes to the naming, availability, and terms and conditions of Rate Schedule 1702 – Ornamental Street Lighting (**RS 1702**) and Rate Schedule 1704 – Traffic Signals, Traffic Signs & Traffic Warnings (**RS 1704**).

BC Hydro provided copies of the Application to medium and large British Columbia (**B.C.**) municipalities. The only intervener submission was filed by the Commercial Energy Consumers Association of B.C. (**CEC**) on May 13, 2011 and that submission expressed support for the Application.

On April 27, 2011 the B.C. Ministry of Transportation provided a letter of comment in which it expressed concern that it could be denied service in cases where a service connection is requested with fewer than eight lights. Although the B.C. Ministry of Transportation did not register as a formal intervener before the BCUC, BC Hydro would like to respond to its concern.

Special Term and Condition No. 1 in RS 1702 states that:

“No service Connection shall be made to add any ornamental street lighting system which does not provide for eight or more street lighting fixtures except that, if the potential is 120/240 volts, then at BC Hydro’s discretion, a Service Connection may be made for a system of less than eight.”

To BC Hydro’s knowledge, this provision dates back to the mid 1960s and the intent of the provision is to minimize the number of system connection points by ensuring that, where practical, multiple lighting fixtures are placed on the same service connection. Minimizing the number of connection points helps to ensure the safety and reliability of the distribution system and reduces installation and ongoing maintenance costs. BC Hydro notes that the provision is

discretionary, and that there are many examples, usually found in rural or remote areas, where BC Hydro has shown flexibility to allow as few as one fixture to connect per circuit. This practical approach has worked well and BC Hydro proposes to continue this practice.

On May 19, 2011, BC Hydro became aware that the City of Richmond had filed, on April 21, 2011, a letter of comment on the Application with the BCUC. The City of Richmond's letter suggests that BC Hydro should: 1) continue to distinguish between lighting systems located on public and private property; and 2) allow all new combined road lighting and receptacle poles to remain unmetered.

In response to the City's first comment BC Hydro notes that it does treat lighting on public and private property differently. Public area ornamental lighting is billed on RS 1702 where no Basic Charges apply and the vast majority of service connections are unmetered. Private Area lighting is largely billed on RS 1300 where Basic Charges apply and loads are typically metered. Although BC Hydro's Application will result in an increase to the number of metered service connections on RS 1702, BC Hydro still expects the vast majority of connections on that rate schedule to remain unmetered.

In response to the City's second comment BC Hydro believes that receptacles should be metered as it is not possible to accurately estimate their consumption. If municipalities are required to meter new receptacle installations, BC Hydro expects they will often choose, for cost saving reasons, to use a single meter to measure the consumption of both the receptacle and roadway lighting ("the combined system") because they can avoid the need to purchase specialized equipment to split the circuit.

BC Hydro believes that metering improves billing accuracy and reduces administration costs for both customers and BC Hydro. The effort required to track and maintain records of unmetered consumption is substantial and BC Hydro is convinced that, in some situations, metering is a better solution. In addition, BC Hydro's Application will eliminate Basic Charges for qualifying connections by facilitating the billing of metered loads on RS 1702.

Given the CEC's support for the Application, the fact that the City of Richmond did not oppose the Application outright and that no other B.C. municipalities submitted comments, BC Hydro requests that the BCUC approve its Street Lighting Application as filed.

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For further information, please contact Fred James at 604-623-4317 or by e-mail at bchydroregulatorygroup@bchydro.com.

Yours sincerely,



Janet Fraser
Chief Regulatory Officer

jm/ma

Copy to: BC Hydro Street Lighting Tariff Application Registered Intervener Distribution List.

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