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April 12, 2011

Ms. Erica M. Hamilton
Commission Secretary
British Columbia Utilities Commission
Sixth Floor – 900 Howe Street
Vancouver, BC V6Z 2N3

Dear Ms. Hamilton:

**RE: British Columbia Utilities Commission (BCUC)
British Columbia Hydro and Power Authority (BC Hydro)
Street Lighting Tariff Application**

BC Hydro is writing to apply to the BCUC under sections 58-61 of the *Utilities Commission Act*, R.S.B.C. 1996, c.473, as amended, for an order approving amendments to two street lighting rate schedules.

This application is being filed further to a commitment BC Hydro made, in its letter dated February 1, 2010 to the BCUC, to consult internal and external stakeholders on its pathway lighting metering policies and the practice of applying Basic Charges to pathway lighting, as discussed further below.

BC Hydro has undertaken consultation with these stakeholders and, as a result, proposes to:

- 1) Change the name of Rate Schedule 1702 – Ornamental Lighting (**RS 1702**) to “Public Area Ornamental Lighting” from “Ornamental Street Lighting” and add a Special Term and Condition to RS 1702 clarifying that unmetered service is at BC Hydro’s discretion.
- 2) Amend the availability of RS 1702 to include “pathway” lighting and “seasonal” lighting.
- 3) Supplement the existing cent per watt charge found in RS 1702 with a cent per kWh energy charge that will allow BC Hydro to bill metered loads.
- 4) Change the name of Rate Schedule 1704 – Traffic Signals, Traffic Signs & Traffic Warning Devices (**RS 1704**) to “Traffic Control Equipment” and amend the availability to include “equipment associated with controlling or directing pedestrian or vehicular traffic”.

Background

In a March 11, 2009 letter to the BCUC, the City of Vancouver (**the City**) requested that BC Hydro be directed to place pathway lighting on RS 1702 rather than on Rate

Schedule 13XX¹ - General Service (Under 35 kW) (**RS 13XX**), the rate at which BC Hydro currently bills unmetered and metered pathway lighting.

BC Hydro responded to the City's complaint on June 5, 2009 and explained that "pathway lighting" is not included in the availability provisions of the RS 1702 tariff, which refers to "public highways, streets and lanes." BC Hydro noted that street lighting of public roads or lanes is typically placed on RS 1702 or Rate Schedule 1701 - Overhead Street Lighting (**RS 1701**) or Rate Schedule 1703 - Street Lighting Service (**RS 1703**). The ownership and location of the streetlights determines which rate is applicable. Lighting for General Service business customers is typically billed on RS 13XX.

In July 2009 the BCUC issued Letter L-54-09 in which the BCUC agreed that BC Hydro had applied its tariff correctly, but requested that BC Hydro evaluate the implications of revising the wording of RS 1702 to include pathway lighting. On February 1, 2010 BC Hydro submitted a report to the BCUC that recommended including pathway lighting under RS 1702 while metering new installations, at BC Hydro's discretion, where loads other than lighting may be connected to lighting circuits. At the end of the report BC Hydro stated its intention to "engage municipalities and review existing internal policies to ensure the changes will be accepted and consistently applied across the province".

Engagement

In late February 2010 internal consultations were held with BC Hydro electrical designers from around the province. Designers felt strongly that street or pathway lighting receptacles needed to be metered in order for BC Hydro to bill consumption. Numerous examples were cited where loads have been added without BC Hydro being informed. These loads can include seasonal Christmas lights, movie trailers (which park on the street and plug into the street lighting circuitry), highway signage, security cameras, and special event related loads. BC Hydro believes that loads go unreported for a variety of reasons including:

- customers simply forget to report the consumption;
- the volume of connection points makes it difficult for customers to track where, when, and how much additional consumption is used on receptacle circuits; and
- unlike traffic signals BC Hydro does not track the location of each street light for billing purposes.

In March 2010 BC Hydro engaged the BC Chapter of the International Municipal Sign Association to discuss changes to the tariff and metering policy. Municipalities supported the tariff change but voiced concern with the cost of metering. Customer comments were relayed to designers in April 2010 and a decision was made to continue requiring that new receptacle circuits be metered.

¹ Prior to January 1, 2011 the General Service (Under 35 kW) rate schedule was coded as RS 1220 in the Electric Tariff. After January 1, 2011 General Service (Under 35 kW) accounts are placed on either Rate Schedule 1300, 1301, 1310, or 1311 (**RS 13XX**) depending on whether the account receives a transformer or metering discount.

Through the summer and fall of 2010 the possibility of installing smart meters on all new street lights was also investigated for the potential to reduce the administrative costs for BC Hydro and its customers. However, the result of this research showed that even existing metering configurations, if applied to all street lighting connections, would add substantial costs to customers bills. It is clear to both BC Hydro and customers that more research is required before pursuing the idea of widespread street light metering using smart meters.

An update on the summer and fall metering work was presented to BC Hydro designers in late October 2010 and the designers expressed support for moving forward with a BCUC application to revise the tariff.

BC Hydro's proposed Changes

- 1) Change the name of RS 1702 to "Public Area Ornamental Lighting" from "Ornamental Street Lighting" and add a Special Term and Condition to RS 1702 clarifying that unmetered service is at BC Hydro's discretion.**

The name change is necessary because pathway lighting, which does not occur on a street but typically is found in parks and similar areas, would now be eligible for RS 1702.

The proposed Special Term and Condition would be identical to the Unmetered Service term and condition found in RS 1704 and states that metering is at BC Hydro's discretion. It is BC Hydro's intention to require that new installations of street and pathway lighting receptacles be metered, but that existing receptacles may remain unmetered and, as such, RS 1702 should reflect that metering is at BC Hydro's discretion.

- 2) Amend the availability of RS 1702 to include "pathway related lighting" and "seasonal lighting".**

This change is consistent with BC Hydro's proposal in its January 2010 response to BCUC letter L-54-09. From a cost perspective, it makes sense to treat pathway, seasonal, and street lighting under the same rate schedule and BC Hydro believes RS 1702 is most appropriate.

BC Hydro understands that receptacles are often used for seasonal lighting. If customers state that receptacles will be used predominantly (> 90 per cent of the time) for seasonal lighting BC Hydro will allow them to be placed on RS 1702. Otherwise, BC Hydro will assume the receptacles are for other non-street lighting purposes such as special event loads, security cameras, lighting commercial signage, or heating and, as a result these receptacles will be placed on the General Service rate schedule RS 13XX.

- 3) Supplement the existing cent per watt charge found in RS 1702 with a cent per kWh energy charge that will facilitate the billing of metered loads.**

The rate in the existing RS 1702 tariff is based on cents per watt of connected lighting. Currently, municipalities provide BC Hydro with the input wattage and a count of their connected street lights for billing purposes. Metering of the receptacles will result in consumption being reported in kWh and the existing rate needs to be modified to facilitate metering.

The cent per kWh rate proposed by BC Hydro is equivalent to:

- a) the monthly cent per watt rate charged in RS 1702 (assuming an average 4,000 hours of operation);
 - b) the residential energy rate for customers exempt from the Residential Inclining Block rate (Schedule 1151,1161 – Exempt Residential Service)²; and
 - c) the cent per kWh rate charged under RS 1704 for traffic signals.
- 4) Change the name of RS 1704 to “Traffic Control Equipment” and amend the availability to include “equipment associated with controlling or directing pedestrian or vehicular traffic”.**

Traffic management has become increasingly more complex as manufacturers have developed devices to safely manage vehicle and pedestrian traffic to reduce personal injury and vehicle damage. This equipment includes: illuminated street name signs, audible pedestrian signals, uninterrupted power supply devices, emergency vehicle pre-emption equipment, and traffic signal communication equipment

Most of these devices are already billed on RS 1704 although some may be billed on RS 13XX. BC Hydro believes that all of these end uses should be eligible for RS 1704. The tariff changes will more clearly specify which rate these various end uses should be billed on thereby improving consistency across municipalities and design offices.

Financial impact

BC Hydro does not know, with precision, the number of customers that will be eligible for the revised RS 1702 rate because BC Hydro’s billing system does not specifically identify street light receptacles or pathway lighting. It is possible that some lighting may have been coded in the billing system as a “bus shelter” or “general lighting” (parking lots, billboard signage, or pathway lighting) when placed on RS 13XX. As a result, to illustrate the financial impact of the tariff changes, BC Hydro has developed low and high eligibility scenarios as shown in Table 1.

BC Hydro’s billing system identifies 165 accounts coded as “municipal lighting or irrigation” that are unmetered and where it is assumed that unmetered lighting accounts are found. The low scenario assumes that 50 per cent or 82 of the 165 unmetered accounts would be eligible to convert to the RS 1702 rate while the high scenario assumes that all unmetered accounts and all metered accounts (coded as municipal lighting or irrigation) are eligible to convert.

Upon BCUC approval, BC Hydro will work with customers to identify eligible accounts for the revised RS 1702.

The only change that will have a financial impact on other BC Hydro ratepayers is the request to amend the availability of RS 1702 which will result in customers on RS 13XX being migrated to RS 1702. Table 1 shows two financial impacts under the low and high scenarios. The first

² The existing cent per watt charge is calculated using BC Hydro’s residential rate as the base rate.

impact is a loss of Basic Charge revenue because RS 13XX has a Basic Charge while RS 1702 does not, and the second impact is a loss in energy revenue because the RS 1702 energy rate is about 10 per cent lower than the RS 13XX energy rate.

Table 1 Annual Financial Impacts

	Low Scenario	High Scenario		
		165 Unmetered Accounts	128 Metered Accounts	293 Total Accounts(165+128)
Number of connections migrating to RS 1702 from RS 13XX	82 Unmetered Accounts			
Annual Energy Usage (MWh)	328 ³	660 ³	1,431	2,091
RS 1702 Energy Revenue ⁴ (\$) (A)	23,806	47,902	103,948	151,850
RS 13XX Basic Charge Revenue ⁴ (\$) (B)	5,135	10,333	8,016	18,349
RS 13XX Energy Revenue ⁴ (\$) (C)	26,764	53,855	116,832	170,687
Cost differential between RS 1702 and RS 13XX (\$) A – (B+C)	-8,094	-16,286	-20,900	-37,186

The financial impact to other BC Hydro ratepayers is minimal. Table 1 shows that BC Hydro will lose about \$8,000 of revenue per year in the low scenario and about \$37,000 per year in the high scenario.

Although the dollar value of the savings is not high, BC Hydro still believes it is appropriate to respond to the City of Vancouver’s concerns and adjust its rate policies to improve fairness and consistency across customer rates.

Review Process for Application

BC Hydro is copying this application to medium and large B.C. municipalities. BC Hydro believes the proposed rate changes are non-controversial and therefore proposes a short review process for this application and suggests the following schedule:

Action	Date
Application filed and provided to 2007 RDA interveners and B.C. municipalities	April 12, 2011
Intervener Registration	April 22, 2011
Final comments on application from interveners	April 29, 2011
Comments from BC Hydro	May 9, 2011

³ Assuming 100 W bulbs with ten lights per connection point and 4,000 operating hours per light per year.

⁴ Based on rates effective April 1, 2010 and not including the rate rider.

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Should the BCUC wish to issue information requests on this application the suggested timetable would need to be adjusted accordingly.

To facilitate the integration of street lighting and other programming changes to BC Hydro's billing system, BC Hydro requests that the BCUC approve the draft tariff sheets found in Appendix A effective July 1, 2011. A draft order is provided as Appendix B.

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

Yours sincerely,



Joanna Sofield
Chief Regulatory Officer

jm/rh

Enclosure (1)

Copy to: BCUC Project No. 3698455 (BC Hydro 2007 RDA) Registered Intervener Distribution List.

City of Abbotsford
Attention: Victor Pankratz
vpankratz@abbotsford.ca

Attention: Brad Thiel
bthiel@abbotsford.ca

City of Fort St. John
Attention: Horacio Galanti
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City of Nanaimo
Attention: Bruce Joiner
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Attention: Brian Denbigh
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Attention: Mark Dalsanto
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City of Vernon
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City of Surrey
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City of Victoria
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Attention: Abid Sivic
Abid.sivic@gov.bc.ca

City of Vancouver
Attention: Phil Wong
phil.wong@vancouver.ca

Corporation of Delta
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Resort Municipality of Whistler
Attention: Ted Battiston
tbattiston@whistler.ca

Street Lighting Tariff Application



Appendix

A

Draft Tariff Sheets

Black-lined and Clean

RATE SCHEDULES

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SCHEDULE 1702 – PUBLIC AREA ORNAMENTAL STREET LIGHTING

Availability: For lighting of public highways, streets and lanes and municipal pathways, and for public area seasonal lighting displays, in those cases where the Customer owns, installs and maintains the standards, fixtures, conductors and controls.

Applicable in: All Rate Zones.

Rate: For each unmetered fixture: 2.42¢ per watt per month.

For each metered fixture: 7.26¢ per kWh

For fixtures without dimming controls the number of watts per fixture include the wattage of the lamp and, where applicable, the ballast.

For fixtures with dimming controls the number of watts per fixture includes the wattage of the lamp and, where applicable, the wattage of the ballast multiplied by the ratio of Billable Wattage After Dimming to Billable Wattage Before Dimming.

The Billable Wattage is the sum of all wattage, on all fixtures, used by a customer. It depends both on the number of fixtures in use and the actual output wattages (bulb plus ballast) of each light. For a customer that has implemented dimming technology, the Billable Wattage will reflect the lower output wattages that result from dimming.

Special Terms and Conditions:

1. Service Connection

Where necessary BC Hydro will provide an overhead or underground Service Connection in accordance with the Terms and Conditions of the Electric Tariff. 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 B.C Hydro's discretion, a Service Connection may be made for a system of less than eight.

Receptacle loads will be permitted for service under this rate schedule provided that such receptacles are used predominantly for seasonal lighting displays, meaning that no more than 10% of the usage may be for other purposes.

~~2. Extension Policy~~

~~BC Hydro will construct a distribution extension if required by the applicant in accordance with the Terms and Conditions of the Electric Tariff.~~

ACCEPTED: _____

ORDER NO. _____

COMMISSION SECRETARY

2. Extension Policy

BC Hydro will construct a distribution extension if required by the applicant in accordance with the Terms and Conditions of the Electric Tariff.

3. Power Factor

All installations of mercury vapour, sodium vapour or fluorescent lamps shall be equipped with the necessary auxiliaries to assure that a power factor of not less than 90% lagging, shall be maintained.

4. Contract Period

The term of the initial contract shall be not more than five years; renewal periods shall be for five years.

5. Fixtures with Automated Dimming Controls.

The following special terms and conditions apply to lighting fixtures fitted with dimming controls:

- a. For purposes of this part “dimming controls” means control units or fittings attached to, or forming part of, a street lighting fixture capable of being programmed or remotely operated so as to reduce the lumens output of the lamps during specified hours each day while the lamps are in operation. The reductions may vary according to the hours of the day, the days of the week, and the seasons of the year.
- b. A Customer wishing to have fixtures with dimming controls separately rated under this rate schedule must submit a Dimming Schedule satisfactory to BC Hydro listing each light fixture fitted with dimming controls, the wattage of the fixture (including the lamp and, where applicable, the ballast), the dimming control setting or settings and the hours each day that the dimming control setting or settings will be in operation.
- c. Whenever the Customer wishes to make changes in the lighting fixtures listed in the Dimming Schedule or in the dimming control settings or hours of operation, the Customer shall submit an updated Lighting Fixture Schedule to BC Hydro listing any changes. Changes will be permitted on a semi-annual basis (twice per year).

Rate
Credit/Rate
Rider:

~~The Negotiated Settlement Credit as set out in Rate Schedule 1902 and the Deferral Account Rate Rider as set out in Rate Schedule 1901 apply to all charges payable under this Rate Schedule, before taxes and levies.~~

ACCEPTED: _____

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BC Hydro

Rate Schedules

Effective: 01 January July 2011

~~Third~~ ~~Fourth~~ Revision of Page 39-1

Rate Increase

~~Effective April 1, 2010 the Rates and Minimum Charge under these schedules include an increase of 6.11% before rounding, approved by BCUC Order No. G-180-10.~~

ACCEPTED: _____

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6. Unmetered Service

- (a) BC Hydro may permit unmetered service under this rate schedule if it can estimate to its satisfaction the energy used in kilowatt hours over a period of one month based on the connected load and hours of use.
- (b) The Customer shall notify BC Hydro immediately of any proposed or actual change in load, or load characteristics, or hours of use.
- (c) BC Hydro, in its discretion, may at any time install a meter or meters and thereafter bill the Customer on the consumption registered.

Rate Rider: The Deferral Account Rate Rider as set out in Rate Schedule 1901 applies to all charges payable under this Rate Schedule, before taxes and levies.

ACCEPTED: _____

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SCHEDULE 1704 – TRAFFIC CONTROL EQUIPMENTSIGNALS, TRAFFIC SIGNS & TRAFFIC WARNING DEVICES

Availability: For traffic signals, traffic signs and traffic warning devices, and other equipment for controlling or directing vehicular or pedestrian traffic on public highways. For cases where the Customer installs, owns and maintains the standards, fixtures, wiring, controls and associated equipment.

Applicable in: All Rate Zones.

Rate: 7.26 ¢ per kW.h.

Special Terms and Conditions:

1. Service Connections

Where necessary BC Hydro will provide an overhead or underground Service Connection in accordance with the Terms and Conditions of the Electric Tariff as applicable to "Service Connections".

2. Unmetered Service

(a) BC Hydro may permit unmetered service under this rate schedule if it can estimate to its satisfaction the energy used in kilowatt hours over a period of one month based on the connected load and hours of use.

(b) The Customer shall notify BC Hydro immediately of any proposed or actual change in load, or load characteristics, or hours of use.

(c) BC Hydro, in its discretion, may at any time install a meter or meters and thereafter bill the Customer on the consumption registered.

3. Contract Period

The term of the initial contract shall not be more than five years; renewal periods shall be for five years.

Rate Credit/Rate Rider:

The ~~Negotiated Settlement Credit as set out in Rate Schedule 1902 and the Deferral Account Rate Rider as set out in Rate Schedule 1901 applies~~ to all charges payable under this Rate Schedule, before taxes and levies.

Rate Increase:

~~Effective April 1, 2010 the Rates and Minimum Charge under these schedules include an increase of 6.11% before rounding, approved by BCUC Order No. G-180-10.~~

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For each metered fixture: 7.26¢ per kWh

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Special
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Conditions:

1. Service Connection

Where necessary BC Hydro will provide an overhead or underground Service Connection in accordance with the Terms and Conditions of the Electric Tariff. 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 B.C Hydro's discretion, a Service Connection may be made for a system of less than eight.

Receptacle loads will be permitted for service under this rate schedule provided that such receptacles are used predominantly for seasonal lighting displays, meaning that no more than 10% of the usage may be for other purposes.

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All installations of mercury vapour, sodium vapour or fluorescent lamps shall be equipped with the necessary auxiliaries to assure that a power factor of not less than 90% lagging, shall be maintained.

4. Contract Period

The term of the initial contract shall be not more than five years; renewal periods shall be for five years.

5. Fixtures with Automated Dimming Controls.

The following special terms and conditions apply to lighting fixtures fitted with dimming controls:

- a. For purposes of this part “dimming controls” means control units or fittings attached to, or forming part of, a street lighting fixture capable of being programmed or remotely operated so as to reduce the lumens output of the lamps during specified hours each day while the lamps are in operation. The reductions may vary according to the hours of the day, the days of the week, and the seasons of the year.
- b. A Customer wishing to have fixtures with dimming controls separately rated under this rate schedule must submit a Dimming Schedule satisfactory to BC Hydro listing each light fixture fitted with dimming controls, the wattage of the fixture (including the lamp and, where applicable, the ballast), the dimming control setting or settings and the hours each day that the dimming control setting or settings will be in operation.
- c. Whenever the Customer wishes to make changes in the lighting fixtures listed in the Dimming Schedule or in the dimming control settings or hours of operation, the Customer shall submit an updated Lighting Fixture Schedule to BC Hydro listing any changes. Changes will be permitted on a semi-annual basis (twice per year).

ACCEPTED: _____

ORDER NO. _____

COMMISSION SECRETARY

6. Unmetered Service

- (a) BC Hydro may permit unmetered service under this rate schedule if it can estimate to its satisfaction the energy used in kilowatt hours over a period of one month based on the connected load and hours of use.
- (b) The Customer shall notify BC Hydro immediately of any proposed or actual change in load, or load characteristics, or hours of use.
- (c) BC Hydro, in its discretion, may at any time install a meter or meters and thereafter bill the Customer on the consumption registered.

Rate Rider: The Deferral Account Rate Rider as set out in Rate Schedule 1901 applies to all charges payable under this Rate Schedule, before taxes and levies.

ACCEPTED: _____

ORDER NO. _____

COMMISSION SECRETARY

SCHEDULE 1704 – TRAFFIC CONTROL EQUIPMENT

Availability: For traffic signals, traffic signs and traffic warning devices, and other equipment for controlling or directing vehicular or pedestrian traffic on public highways. For cases where the Customer installs, owns and maintains the standards, fixtures, wiring, controls and associated equipment.

Applicable in: All Rate Zones.

Rate: 7.26 ¢ per kW.h.

Special
Terms and
Conditions:

1. Service Connections

Where necessary BC Hydro will provide an overhead or underground Service Connection in accordance with the Terms and Conditions of the Electric Tariff as applicable to "Service Connections".

2. Unmetered Service

- (a) BC Hydro may permit unmetered service under this rate schedule if it can estimate to its satisfaction the energy used in kilowatt hours over a period of one month based on the connected load and hours of use.
- (b) The Customer shall notify BC Hydro immediately of any proposed or actual change in load, or load characteristics, or hours of use.
- (c) BC Hydro, in its discretion, may at any time install a meter or meters and thereafter bill the Customer on the consumption registered.

3. Contract Period

The term of the initial contract shall not be more than five years; renewal periods shall be for five years.

Rate Rider: The Deferral Account Rate Rider as set out in Rate Schedule 1901 applies to all charges payable under this Rate Schedule, before taxes and levies.

ACCEPTED: _____

ORDER NO. _____

COMMISSION SECRETARY

Street Lighting Tariff Application



Appendix

B

Draft Order

**BRITISH COLUMBIA
UTILITIES COMMISSION**

**ORDER
NUMBER** G-

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IN THE MATTER OF
the Utilities Commission Act, R.S.B.C. 1996, Chapter 473

and

British Columbia Hydro and Power Authority (BC Hydro)
Street Lighting Tariff Application

BEFORE:

, 2011

ORDER

WHEREAS:

- A. On April 12, 2011 BC Hydro filed an application under Sections 58-61 of the *Utilities Commission Act* (the Act) seeking the BCUC's approval of amended schedules and terms and conditions for Rate Schedules (RS) 1702 and RS 1704;
- B. In its application BC Hydro states that the purpose of the amendments is to allow pathway lighting and certain electrical loads associated with traffic control equipment to be billed under RS 1702 and RS 1704 respectively;
- C. Municipalities have requested these changes because they believe RS 1702 and RS 1704 are more appropriate rates to bill the aforementioned loads;
- D. *Other recitals as required for process;*
- E. The Commission has considered the filing, evidence and submissions of BC Hydro and interveners

NOW THEREFORE pursuant to Section 44.2(3) of the Act the Commission orders as follows:

1. That the revised rate schedules RS 1702 and RS 1704, which are shown in Appendix A of the Application, are approved effective July 1, 2011.

DATED at the City of Vancouver, in the Province of British Columbia, this day of , 2011.

BY ORDER