



Nov 06, 2015

Ms Erica Hamilton, Commission Secretary  
British Columbia Utilities Commission (BCUC)  
6<sup>th</sup> Floor 900 Howe Street  
Vancouver, BC V6Z 2N3

Dear Ms Hamilton and Commission

RE: BC Hydro and Power Authority 2015 Rate Design Application Appendix B to Order G-156-15

In response to your email of Nov 03, 2015, I am deeply dismayed by the Commissions decision to not include the review of Meter Choices Program fees within the scope of the 2015 Rate Design proceedings. I am requesting that the Commission reconsider this decision after consideration of new evidence and additional clarification of related issues that are within the proposed scope of this proceeding.

#1 Fiscal 2016 Cost of Service (COS) Study. The COS study and methodology are clearly used to justify the rate design proposals affecting issues in both Module 1 and 2. A review of this methodology is important to have any meaningful input into and understanding of rates and how these classification decisions impact the rate design application. BC Hydro's proposal to leave interveners concerned about the Meter Choice Program fees out of these workshops and the 2015 Rate Design Application proceedings inopportunes and disadvantages them. The impact of shifting these classifications and cost structures on rates, particularly on residential rates is significant.

#5 Any Other Relevant Matters: Connections between Module 1 and Module 2. What becomes apparent when reviewing the application is there are many connections between the proposed Module 1 and Module 2 issues. Issues within these modules in fact overlap and inform or precede each other. For example the decisions that are made within the #1 Fiscal 2016 Cost of Service Study methodology in Module 1 concern how meter costs are classified and billed. It's critical to understand what specific costs are included in meter costs and the impact of their classification as either the customer and/or Hydro's responsibility.

This important issue was not reviewed in the previous proceedings on the Meter Choices Program. The previous proceeding did not address the change to the existing contract between BC Hydro and customers who wanted to retain their existing service contract, which already included the meter and meter reading charges. BC Hydro created the Meter Choices Program to charge separately for reading existing meters but this did not provide any new service that was not already included in the existing service contract. Under contractual law to charge separately for the service of reading the existing meter would not be allowable without first deducting the charges for this service from the existing rates it was already included in. Charging for meter reading twice is double billing and makes this a rate increase. It represents additional revenue for BC Hydro, not an additional expense.

#5 Any Other Relevant Matters: There are a number of interveners with submissions concerning the Meter Choices Program fees which very much appears to fit within the scope of these proceedings

under #5 Any Other Relevant Matters. In this public process interveners are representative of many more British Columbians who share these concerns.

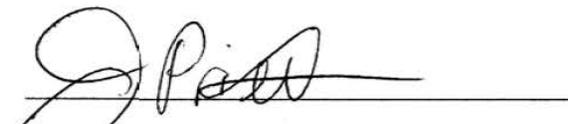
New information was submitted in these proceedings that clearly shows:

- How inequitable and high BC Hydro's legacy meter fees and other charges are in British Columbia compared to other jurisdictions and recent changes that have eliminated or reduced these fees. This information and the questions that it raises has not been examined by the Commission.
- Significant impact on residential customers. The extent of the rate increase from these fees has not been examined by the Commission, and I call it a rate increase because it represents over 50% (approx 52%) of my bill while I am receiving the exact same service I always have.

Please consider this new information and reconsider your decision to include this issue in the 2015 Rate Design Application proceedings. To have British Columbians wait any longer to address this issue, and not review it until 2020 is unreasonable, and will deprive us of the timely resolution of this matter.

Unfortunately in taking this position, BCUC is supporting the frequently inappropriate behaviour of BC Hydro, who apparently operate in an environment in which they think they don't need to respect the concerns of their customers. The best advice I have ever heard in business and something BC Hydro would do well to take note of came from CEO Robyn Allan, who simply said, "All commerce is based on human relationships."

Thank you for your consideration.



Jayne Priest