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British Columbia
Utilities Commission

Letter of Comment

In accordance with the Commission's Rules of Practice and Procedure, to submit a letter of comment concerning an application currently before the Commission, please provide a completed form to commission.secretary@bcuc.com. If email is unavailable, please mail the form to the address above. By doing so, you acknowledge that all letters of comment are published with the author's name as part of the public evidentiary record, both in print copy and on the Commission's website. All personal contact information provided on this page is removed before posting to the website. Forms must be received by the Commission by the last filing date included in the proceeding's regulatory timetable before final arguments.

Proceeding name

Shannon Estates Thermal Energy System Rate Application

Are you currently registered as an intervener or interested party?

Yes, interested party

Name (first and last)

Bor Li

City

[REDACTED]

Province

BC

Email

[REDACTED]

Phone number

[REDACTED]

Letter of Comment

Name (first and last)

Bor Li

Date:

30-Jun-16

Comment: Please specify the reasons for your interest in the proceeding, your views concerning the proceeding, any relevant information that supports or explains your views, the conclusion you support and any recommendations. The Commission may disallow comments that do not comply with the Rules of Practice and Procedure.

Dear Commissioner,

I would like to present the following facts for your consideration in deciding on SETES's rate proposal:

1) Space cooling charges and capacity charge for tenants

-The rate application does not make a distinction between the types of service available to tenants and condo owners, "The SE TES is to provide space heating, space cooling and domestic hot water to approximately 600 residential customers(36% rental)..." Condo owners have air-conditioning yet tenants do not. It gets so hot in the summer that multiple portable air conditioners (powered by electricity) are required to be in operation to keep the place cool. Correspondence by the property management reassures that only heating and hot water are provided. Therefore, tenants should not be billed for space cooling service and should have their capacity charge proportionally reduced by the number of months such feature is typically required (e.g. May to August).

2) Sustainment capital fund

Since the SETES plant is owned by Shannon Wall Centre Rental Apartments Limited Partnership (SWCRA) which also owns Shannon Mews and Apartments, the financial responsibility to maintain the utility should fall on the landlord (SWCRA) instead of tenants. Thus, tenants should not be required to pay for the sustainment capital fund if it is approved.

3) QMC (the sub-metering and utility billing company hired by SETES) — discrepancies in fees

QMC lays out the following charges in the utility billing enrolment form: new account set-up \$30, security deposit 2.5 times monthly bill if direct deposit is not chosen as the form of payment, disconnect \$100, administration fee \$9.5, late payment fee 1.5%/per month, NSF \$50, collections fee \$25.

Many of the above fees are inconsistent with those set out in the tariff. Does BCUC have authority to regulate fees collected by QMC related to SETES's service? It is unclear that whether customers are required to pay fees set out by both QMC and SETES.

Form of payment (direct deposit) should not be considered as the only criteria to evaluate credit worthiness of customers. In addition, QMC fails to mention the return of customers' security deposit after one year of good payment history with interest in its correspondence while such a requirement was stated in the tariff.

4) Disclosure

-When the rental lease was signed, no disclosure regarding the utility charges was made despite inquiries. Coincidentally, the property manager left her job in the month of the rate application. The first group of tenants moved in December 2015 and had not seen the utility bill until now. The new utility charges come as a surprise to many tenants, as they were led to believe by the departed property manager that heat and hot water were covered by their rent/BC hydro.

Yours truly,

Bor Li