

Sixth Floor, 900 Howe Street, Box 250  
Vancouver, BC, Canada V6Z 2N3Phone: 604-660-4700  
BC Toll Free: 1-800-663-1385  
Fax: 604-660-1102  
www.bcuc.com**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](mailto: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 Are you currently registered as an intervener or interested party? Name (first and last) City  Province Email  Phone number

# Letter of Comment

Name (first and last)

Jerrilynn DeCock

Date:

August 30, 2016

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.

Further to my previous submission, I have been looking into this RIB rate report process on the internet and I am wondering about this process when Hydro BC (HBC) requests an extension to September 16, 2016 and Fortis BC (FBC) is automatically afforded the same right without even asking, yet after this fact it was determined that the information on this process was not disseminated far enough and the public response was then only extended less than one month to September 2, 2016 and not to the same September 16 afforded to the utility companies. Will the public be afforded the opportunity to respond to the utility companies' reports?

In my previous submission I responded to the five questions asked by the Minister. I have since researched the beginning of this RIB rate structure and learned that it is to be revenue neutral to the utility company (my assumption was correct). Even for those not educated or experienced in this field of electrical power, it should be very clear to anyone that those customers who require electric space and water heat that their energy consumption is going to be substantially higher during the winter heating months. There is no way that these customers can keep their energy consumption within the tier 1 energy allotment of 1600 kWh bimonthly and so are forced to pay significantly higher (over 154% higher) energy costs in tier 2 and hence are penalized for circumstances beyond their control. This very clearly constitutes a subsidy to those customers that do not require electrical heating (or rural water systems and nighttime lighting) since the tier 1 rate was made lower to compensate for the increased revenue from the tier 2 rate to remain revenue neutral to the utility companies. This rate is regulated by law in this province and so violates Article 15 of the Charter of Rights and Freedoms which I have printed here:

## EQUALITY RIGHTS

Equality before and under law and equal protection and benefit of law

**15. (1) Every individual is equal before and under the law and has the right to the equal protection and equal benefit of the law without discrimination and, in particular, without discrimination based on race, national or ethnic origin, colour, religion, sex, age or mental or physical disability.**

Affirmative action programs

**(2) Subsection (1) does not preclude any law, program or activity that has as its object the amelioration of conditions of disadvantaged individuals or groups including those that are disadvantaged because of race, national or ethnic origin, colour, religion, sex, age or mental or physical disability. (84) (page-18.html#f84)**

The law approving this rate structure does not provide equal benefit of the law but causes some customers to partially pay for the energy costs of other customers.

In a charter challenge there must be an identifiable group, such as those particularly named in the Act. There are several identifiable groups in this case; those without access to natural gas and also rural customers without access to natural gas or utility water systems and street lighting.

I have also seen that this process has been taking an inordinate amount of time at the request of the utility companies to acquire data, they say. With respect to the demand management questions, the utility companies cannot possibly

have data from a bulk-use rate that could tell if the rate structure has had any affect on peak demand shaving. They can only tell if the monthly or bimonthly energy consumption has gone down. Time of use (TOU) metering / billing would be required to collect data regarding peak demand shaving. It is only the peak demand that is relevant to the requirement for total generation in the province and tie-lines capacity / security. Anything else is simply energy conservation and that cannot be fairly applied to all customers with a single two-tier rate structure for all. I understand from someone who has been here a long time that there are some customers that do have TOU metering. They cannot be representative of all customers and I expect there are not many of these customers. I also understand that there are some farm customers that are exempt from the two-tier structure. I'm not sure how that is fair to other rural customers with livestock, but not farm status.

In fairness, there must be a moratorium on this two-tier rate structure before this winter heating season. It may be good that the utility companies have been collecting all this data so that they will have the capacity to quickly reline to a single rate that will be revenue neutral to them until a new comprehensive and fair-to-all rate structure can be developed that may be more in line with a multiple rate structure like for industrial customers.

TOU metering is the only possibility to a fair peak demand shaving rate structure, but it must also still be mindful of the different unalterable energy requirements of different classes (groups) of customers. Any rate structure that creates a cross-subsidy between customer groups does not provide equal benefit of the law (approved rate structure by law).

Jerrilynn DeCock  
Senior Electrical Engineer