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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. 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)

Dave Tarris

Date:

7-Sep-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.

My Local Government, The Islands Trust did not receive the letter dated July 7, 2016 asking for support of local governments in publicizing the British Columbia Utilities Commission's request to submit comments on the effects of proposed rate 2 electrical utility charge increases on customers without access to natural gas. Your failure to notify them has left their approximately 30,000 constituents uninformed of this opportunity to comment within the allotted deadline. As The Islands Trust is extremely well equipped to provide advocacy in these matters as demonstrated by their fulsome advocacy against unreasonable ferry fare rate increases, this was a most egregious oversight. Your Public outreach has proved to be less than stellar as none of the 26 Trustees or numerous Trust employees saw any of the Notices buried in the back pages of rural weeklies. Very few people today peruse a weekly paper from cover to cover to discover any hidden Easter eggs. As Nicholas Marty commented, if the Commission was genuine in their desire for a full and fruitful public consultation they would have directed the involved utilities to include the Notice in their bill, either electronic or snail mail. Secondly, they would have made sure that the form that one was requested to download would be available to the average domestic computer user without access to the very latest computer hardware and software. Since the receptionist could send those who requested it an email with a form that was easily accessible on legacy computing equipment, it begs the question why was this not the form available on the link the public notice directs the user to. As structured the site was hardly what one would describe as user friendly. Oddly enough when I complained to the receptionist, she mentioned that there were many similar complaints and that their IT person was on holiday! This was after another employee of the Commission reckoned this was the largest public outreach they had ever undertaken. To date, after this largest ever endeavor, you have received approximately 300 comments from your target audience numbering in the tens of thousands. When I phoned a few days after the original deadline of August 15, 2016 to enquire as to why the exhibits of comment letters had not been updated in two days, the pleasant young woman declared that they had brought in extra staff, including herself to deal with the backlog. Was the Commission only expecting such a pitiful response to their request for comments? It is extraordinary that 20 letters a day would cause an unexpected backlog. Even with the additional help, still some of the exhibit names do not match the document that is accessed. For evidentiary

purposes, this does not bode well. I would request that in light of the foregoing litany of missteps in seeking public consultation as required, that the Commission consider an overhaul of their public outreach on this issue and extend the deadline for submissions and place some front page advertorials in the major papers and the odd television spot as well as directing the involved utilities to provide notice with the billing. Bring your IT person back from holidays and address your requests to local governments for help in publicizing this to the CAOs or Directors or Trustees and not as was the case with my Regional District to the receptionist, where it sat for 50 days until I enquired as to what the CVRD was willing to do to publicize this opportunity. This has not been BC Utilities Commission's finest hour. Many of us are aware of the BC Government's curtailing of The Commission's mandate to weigh in on extraordinarily important decisions of the affected utilities (Site C, Smart Meter Program, Independent Power Producers). However if this is indicative of the rigorous public engagement process you have envisioned, it certainly falls materially short of the aspirations and vision statements as laid out in your glossy Annual Report. When the carefully circumscribed Utilities issues you are still allowed to hold hearings on proceed with such a bumpy start, you run the very real risk of appearing disingenuous in your attempts and a cynical person might conclude that the real function of the much leaner Commission is now to provide merely an illusion of a robust and independent Regulator.

I performed a rough and tumble exercise on Thetis Island with roughly 380 full time residents. I placed copies of the Public Notice, Samples of extremely well prepared comment submissions, hard copy forms of the only allowable type to be mailed in, and briefing notes at our Library, Ferry Landing, Rural Mail Box Depot, and Solid Waste Recycling Centre. I was able to cajole the CVRD to locate the missing request letter and finally get the Public Notice posted to their website with only 4 days before deadline. Other members of the community put out emails and the Thetis Blog put up forms in word format suitable for use on legacy computers, since many people were unable to download the Commission's form. I've noted that roughly 20 of the 300 comments are from Thetis Island Residents. If we were to extrapolate those results to the affected rural population of BC unable to access natural gas we would expect five to ten thousand letters. That might then justify the many lawyers, commissioners and relatively small number of interveners to proceed.

As to the effects of the increased second tier billing, I can do no better analysis than Peter Midgley's submission Exhibit E-207. If a southern Gulf Island's total utility bill is double that of a comparable home able to access natural gas, it should not take the most learned of individuals to recognize the inequitable nature of this rate design. As to its other name the Conservation Rate, while this might have some ability to curtail superfluous electrical use in those able to access natural gas, it is absurd to think it

promotes conservation in homes that rely on electricity for all their needs. This seems a classic example of green washing. My 90 year old aunt and uncle roam around their home in winter, dressed in winter coats with headlamps on to avoid going into tier2. Is this truly what our governments wish to subject middle and low-income families to? I would suggest that if this is the case then they display the empathy, compassion and ethics of Attila The Hun.

Ontario Hydro and BC Hydro have discovered that their smart meters cannot communicate reliably to Central Office in a rural setting with an abundance of trees and leaves. The network cannot be economically made robust enough to be reliable. In Ontario, after thousands of complaints to their Ombudsperson, that Utility found it necessary to request the ability to have those meters read. It is my understanding in BC that similarly compromised meters are not even read by meter readers but estimated and if you don't mind the pun those estimates always seem to run to the "liberal" side of the ledger.

I will be interested in viewing the numerous letters submitted by the Regional Districts contacted, detailing the steps they took to publicize this opportunity, in order to reassure me that our Regional District's experience was an outlier.

I would hope the British Columbia Utilities Commission still possesses enough autonomy to correct these numerous deficiencies in process as noted and takes steps to rectify them. If not my growing cynicism will be justified.

Sincerely,

David Tarris, Dip'L T

[REDACTED]
[REDACTED] B.C. [REDACTED]

P.S.: As the content of the comment form and not the form itself is the germane issue, you may include this as my comment or not as you wish. Your actions will of course serve to define you.