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VIA COMMISSION E-FILING

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October 19, 2016

Mr. Tom Loski
Chief Regulatory Officer
Regulatory & Rates Group
British Columbia Hydro and Power Authority
16th Floor - 333 Dunsmuir Street
Vancouver, BC V6B 5R3

Dear Mr. Loski:

**RE: British Columbia Hydro and Power Authority
Project No. 3698869 / Order G-40-16
F2017 – F2019 Revenue Requirements Application
Zone II Ratepayers Group (ZonellRPG)
Information Request #1**

In accordance with the Regulatory Timetable set out in Order G-144-16 (Exhibit A-7), please find ZonellRPG Information Request No. 1.

Yours truly,



Linda Dong
Representing Zone II Ratepayers Group

Enclosure

REQUESTOR NAME: **Zone II Ratepayers Group (“ZONEIRPG”)**

INFORMATION REQUEST ROUND NO: 1

TO: **BRITISH COLUMBIA HYDRO & POWER AUTHORITY**

DATE: **October 19, 2016**

PROJECT NO: **3698869**

APPLICATION NAME: **BC Hydro F2017-F2019 Revenue Requirements Application**

1.0 Reference: Exhibit B-1-1, Page 5-15, Page 5-24 - 25; Page 5-26, Table 5-7; Page 5-26 – 29; Page 5-21, Table 5-10; Page 5-33, Table 5-12; Page 5-105

Topic: Operating Costs, Productivity, Efficiency

Explanation: 5.3.1.3 Workforce Optimization

In July 2015, BC Hydro launched the Workforce Optimization Program to examine BC Hydro’s resourcing model to ensure that it has the right mix of internal and external resources.

Ensuring we have the right mix of internal and external resources is key to delivering on our business objectives. Since fiscal 2011, BC Hydro eliminated over 900 positions. These changes helped drive an efficiency mindset through the organization.

5.3.3 Fiscal 2017 to Fiscal 2019 FTEs

BC Hydro’s planned FTEs, including overtime and Site C Clean Energy Project FTEs, are 6,296 for fiscal 2017, 6,344 for fiscal 2018 and 6,365 for fiscal 2019.

FTEs are calculated by taking the total number of hours (regular and overtime) worked in a given year divided by the average number of hours a full time employee would work per year. These averages differ by affiliation and, for the test period, are 1,621 hours for Management and Professional employees (including Executive), 1,535 hours for MoveUP employees and 1,461 hours for International Brotherhood of Electrical Workers employees.

Distribution Line Maintenance

The distribution system has approximately 58,600 km of overhead lines; 5,000 circuit km of underground lines;

Request:

1.1 Provide the following statistics for F2007 to F2019 and include in a functional Excel spreadsheet as part of Appendix A, 00_13_01_F17_F19_RRA_APPX_A.xlsx;

- Customers – Year-end and Average
- MWh Sales
- Km of Distribution Lines – Circuit, Length
- Km of Transmission Lines – Circuit, Length
- Employees – FTEs and (year-end) Head Count
- Employees – FTEs and (year-end) Head Count for each of Operating, Maintenance & Administration and Total OM&A, Site C, All Other Capital and Total Employees

- Employees – FTEs and year-end Head Count for retirement replacements
 - Employees – FTEs and year-end Head Count for meter reading
 - Hours of Overtime Worked
 - OM&A Cost per Customer
 - OM&A Cost per MWh
 - Customers per Distribution km
 - Distribution Cost per km
 - Transmission Cost per km
 - Distribution km per employee
 - Distribution & Transmission km per employee
 - Cost per Employee – All Average (See SLR, Table 5-10)
 - Salaries & Wages
 - Benefits
 - Total
 - Other Overhead Burden
 - Average Employee Cost per Year
- 1.2 Provide the number of consultants and contractors and payments to consultants and contractors for F2007 to F2019.
- 1.3 Provide the number of retired and the number of former BC Hydro employees that worked for BC Hydro as consultants and contractors for each year from F2007 to F2019.
- 1.4 Provide the analysis by employee group (M&P+E, MoveUP, IBEW) for the average number of hours a full time employee would work per year to the total hours paid per year. For example: 1950 hrs/yr – vacation – stat holidays – sick leave – time off, etc.
- 1.5 Provide the analysis by employee group (M&P+E, MoveUP, IBEW) showing the average, minimum and maximum number of overtime hours worked per employee.
- 1.6 How is time off in lieu of paid overtime treated in determining FTEs?
- 1.7 Provide Table 5-12, FTEs by Business Group, for F2007 to F2019.
- 1.8 Clarify whether km of lines wherever used for Distribution and Transmission is circuit km or length (distance) of the system.

2.0 Reference: Exhibit B-1-1, Appendix X, Page 2

Topic: Line Losses

Explanation: One of the benefits of SMI was that line losses would be reduced.

Request:

- 2.1 Provide the annual line losses or if not available, the line losses and system use as experienced by BC Hydro since F2007 and forecast to F2019.
- 2.2 Confirm that line loss (unaccounted for) reductions due to SMI are included as increased revenue to BC Hydro.

3.0 Reference: Exhibit B-1-1, Page 1-42

Topic: Allowed Return on Deemed Equity

Explanation: 1. An increase in forecast mid-year deemed equity from fiscal 2016 to fiscal 2017, which, after applying the allowed return on equity of 11.84 per cent, results in an increase in return on equity of \$33 million in fiscal 2017; and

7.4 Threshold for Establishing New Regulatory Accounts

BC Hydro believes that the criteria discussed in section 7.3 for situations where a regulatory account may be warranted continue to be applicable. With respect to the deferral of differences between forecast and actual costs, BC Hydro remains of the view that it should assume financial responsibility for controllable risks and create regulatory accounts for non-controllable risks. However, to limit the number of regulatory accounts, an objective measure should be used as a threshold for creating a new regulatory account. BC Hydro believes that un-forecast and non-controllable expenditures with a net income impact of greater than \$10 million in a fiscal year would be considered material; therefore, in these cases, a new regulatory account would be warranted to defer the impact for future recovery.

Request:

- 3.1 Confirm that the BC Hydro allowed return on equity includes a risk premium as does the comparable utility.
- 3.2 Does a risk premium include non-controllable risks?
- 3.3 How did BC Hydro determine that a \$10 million (<1.5% or Net Income / Return on Equity) net impact is material?
- 3.4 Does BC Hydro accept that there is an obligation on the utility to take corrective action and mitigate net income impacts?
- 3.5 For each year from F2007 to F2019, identify any costs or revenue losses that BC Hydro has absorbed and not placed in a deferral account.

4.0 Reference: Exhibit B-1-1, Page 1-43; Page 7-44, Table 7-6

Topic: Rate Smoothing

Explanation: 1.6.3.11 Rate Smoothing

Transfers to the Rate Smoothing Regulatory Account are forecasted to increase from \$121 million in fiscal 2016 to \$210 million in fiscal 2017, \$286 million in fiscal 2018 and \$299 million in fiscal 2019. The forecasted rate smoothing transfer is a calculated amount necessary to keep rate increases within the rate caps laid out in section 9 of Direction No. 7, and will vary from year to year. In accordance with the 2013 10 Year Rates Plan, this account will be reduced to zero in fiscal 2024.

Table 7-6 Fiscal 2015 to Fiscal 2019 Rate Smoothing Regulatory Account – Actual and Forecast Additions

Deferral	(\$ million)
Fiscal 2015 Actual	166.2
Fiscal 2016 Actual	121.2
Fiscal 2017 Plan	210.0
Fiscal 2018 Plan	285.9
Fiscal 2019 Plan	299.4

BC Hydro is on track to reduce the balance of this account to zero by fiscal 2024, as required by the 2013 10 Year Rates Plan. However, BC Hydro is not requesting approval of a recovery mechanism for the account with this application.

Request:

- 4.1 Provide the continuity schedule and calculations to support the forecast recovery of the Rate Smoothing Account over the time period from F2016 to F2024.
- 4.2 Provide the rate increase forecast for each year to F2024.

5.0 Reference: Exhibit B-1-1, Page 1-1; Page 1-18, 1-19; Page 5-25; Page 7-6, Table 7-2; 10 Year [BC Hydro Rate] Plan, Attachment 5-1, <https://news.gov.bc.ca/stories/10-year-plan>

Topic: Cost and Capital Expenditure Reductions

Explanation: *The proposed rates and revenue requirements in this Application reflect BC Hydro's significant effort to manage and control its costs in order to deliver on the 2013 10 Year Rates Plan covering fiscal years 2015 to 2024, despite forecasting approximately \$3.5 billion less revenue over that period ...*

This application describes a number of steps that BC Hydro has taken, and will continue to take, to achieve the targets of the 2013 10 Year Rates Plan. Since the introduction of the 2013 10 Year Rates Plan BC Hydro has, among other things:

- *Restructured its operations to support strong delivery of key outcomes;*
- *Initiated a Workforce Optimization program to replace external contractors with internal staff to reduce costs and/or improve outcomes;*

- *Initiated a Work Smart program which has resulted in a gain of 22,500 annual hours of capacity;*

.....

This Application describes a number of steps that BC Hydro has taken, and will continue to take, to achieve the targets of the 2013 10 Year Rates Plan while continuing to deliver safe, reliable and responsive service. Since the introduction of the 2013 10 Year Rates Plan, BC Hydro has, among other things:

- *Restructured its operations;*
- *Undertaken several initiatives to manage operating costs to offset the impacts of inflation and other cost pressures;*
- *Reduced forecast finance charges by employing a debt management strategy for future debt that could yield savings of approximately \$45 million over the three-year test period;*
- *Prioritized and reduced forecast capital expenditures by \$381.2 million and capital additions by \$392.5 million from fiscal 2017 to fiscal 2019;*
- *Reduced forecast dismantling costs;*
- *Optimized our energy portfolio; and*
- *Updated its Demand-side Management Plan.*

Quotes:

Bill Bennett, Minister of Energy and Mines and Minister Responsible for Core Review -

This is a balanced and responsible plan that keeps rates as low as possible while funding infrastructure investments to support our growing economy and population. Since 2011, government and BC Hydro have worked hard to reduce pressure on rates and we will continue to work together over the course of this plan to keep our electricity system affordable, reliable and sustainable.

Charles Reid, CEO, BC Hydro -

BC Hydro has worked hard to keep costs down for our customers and we will continue to work with government to find savings wherever possible as we make the investments required to keep our system reliable and meet growing demand.

Request:

- 5.1 When did BC Hydro begin to take measures to manage operating and capital expenditures and the growth in Deferral Accounts?
- 5.2 For each year from F2014 to F2016 following the implementation of the 10 Year Rates Plan by the Province, provide the actions and corresponding expenditure reductions made to reduce the growth of the deferral accounts and capital expenditures.
- 5.3 Explain what is meant by “strong delivery” and “key outcomes”.
- 5.4 Provide examples of “strong delivery”.
- 5.5 List and explain the “key outcomes”.
- 5.6 Provide a table / summary of differences between actual and allowed revenue requirements that will flow into deferral accounts and the applicable deferral account for each variance.
- 5.7 Confirm that 22,500 annual hours of capacity is approximately 14-15 employees.

6.0 Reference: Exhibit B-1-1, Page 1-40; Page 5-1; Page 5-6; Page 5-8 – 5-9

Topic: SMI

Explanation: 3. *Approximately \$21 million of Smart Metering and Infrastructure operationalized costs, net of savings. These costs were previously deferred to the Smart Metering and Infrastructure Regulatory Account prior to fiscal 2017 (refer to Chapter 5, section 5.2.1).*

The ongoing costs (net of benefits) related to operationalizing the Smart Metering and Infrastructure Program are forecast to be \$22.1 million in fiscal 2017, decreasing by \$1.4 million in fiscal 2018 and decreasing by \$0.1 million in fiscal 2019. These operating costs are a required element of achieving the net benefits of the Smart Metering and Infrastructure Program. A project completion report for the Smart Metering and Infrastructure Program is planned to be filed during the time period of this proceeding, and will show that the Program has a positive net present value benefit for ratepayers.

....

Total operating expenditures are planned to increase by \$50.7 million in fiscal 2017, \$58.5 million in fiscal 2018 and \$25.0 million in fiscal 2019 (before regulatory accounts). Overall, BC Hydro's operating costs and FTEs over the test period reflect a rigorous effort by BC Hydro to identify cost savings and efficiencies across the organization in order to meet the objectives of the 2013 10 Year Rates Plan and our priorities as outlined in Chapter 1.

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- *Smart Metering and Infrastructure Program – pursuant to British Columbia Utilities Commission Order No. G-48-14, operating costs related to the Smart Metering and Infrastructure Program have been deferred in fiscal 2015 and fiscal 2016. Starting in fiscal 2017, these costs have been integrated within the relevant business groups.*

.....

5.3.1.1 Smart Metering and Infrastructure Program

Beginning in fiscal 2012, actual operating costs related to the sustainment of Smart Metering and Infrastructure technologies, less actual benefits realized, were deferred into the Smart Metering and Infrastructure Regulatory Account. This deferral treatment continued in fiscal 2015 and fiscal 2016 pursuant to British Columbia Utilities Commission Order No. G-48-14. Section 7.5.19 provides more details with regard to the Smart Metering and Infrastructure Regulatory Account.

The Smart Metering and Infrastructure Program had an approved budget of \$930 million and was implemented \$150 million under budget at a final cost of \$779.2 million. As of March 31, 2016, all sustainment activities related to the implemented Smart Metering and Infrastructure technologies have been integrated into the business groups to which they relate.

.....

Ongoing sustainment costs, savings and FTEs that are related to Smart Metering and Infrastructure sustainment impact the following Key Business Units during the test period:

- (Note: Refer to bullet items from Exhibit B-1-1, Pages 5-11 to 5-13)

Request:

- 6.1 Provide the SMI Business Case / Plan. If there is more than 1 Business Case, file all and identify any changes to the Business Cases.
- 6.2 Provide an analysis of the implementation cost variances from budget, identifying scope changes and changes in benefits.
- 6.3 Provide a table of SMI forecast benefits from the SMI business case and the benefits achieved.

- 7.0 Reference:** Exhibit B-1-1, Page 1-31, 1-32; Page 5-111; Page 7-9 - 10; BC Hydro RDA, Transcript Volume 4, Page 623
Attachment 7-1, <http://www.timescolonist.com/opinion/columnists/les-leyne-report-critical-of-site-c-dam-generates-a-fuss-1.1616526> ;
Attachment 7-2, https://news.gov.bc.ca/files/Newsroom/downloads/site_c_cost_estimate.pdf ;
Attachment 7-3, <http://vancouversun.com/opinion/columnists/vaughn-palmer-hydro-charged-up-over-site-c-review-glosses-over-cost-concerns> ;
Attachment 7-4, <https://www.sitecproject.com/independent-review-of-site-c-by-ernst-and-young-bty> ;
Attachment 7-5, <http://eureka.sbs.ox.ac.uk/5025/1/SSRN-id2406852.pdf> , **Should we build more large dams? (Ansar, Flyvbjerg, Budzier, Lunn)**

Topic: Site C

Explanation: *In December, 2014, the Province approved the Site C Clean Energy Project to proceed to construction. Construction started in fiscal 2016 with forecast completion in fiscal 2025. The Site C Clean Energy Project will be the third dam and hydroelectric generating station on the Peace River in northeast B.C. It will provide 1,100 MW of capacity, and produce 5,100 GWh of electricity each year – enough to power the equivalent of about 450,000 homes each year for more than 100 years. The expenditures on the Site C Clean Energy Project are approximately 30 per cent of our total capital expenditure forecast over the next ten years. Given the size and duration of the Site C Clean Energy Project, it has been set up as its own key business unit within the newly formed Capital Infrastructure Project Delivery Business Group to support successful project completion. The Site C Clean Energy Project construction will be ongoing over the three-year test period and will not have an impact on rates until it is completed and placed into service as a capital addition (after the current test period).*

BC Hydro has well developed processes for assessing, prioritizing and executing on capital projects. Examples include:

- *BC Hydro has developed and implemented robust processes for capital investment planning and delivery across the organization to ensure that the appropriate capital investments are planned to start and be delivered at the right time, and within established budgets. BC Hydro has worked to integrate its planning and capital delivery processes where possible, based on a collaborative approach across our generation, transmission, distribution, technology, vehicle fleet and properties functions;*
- *BC Hydro has also developed a Capital Investment Framework, which includes a standardized approach to applying our corporate risk matrix for*

capital investment planning across the organization. Potential capital projects within the business group's capital investment portfolios are reviewed within the risk framework to identify and consider the risks and impacts of potentially delaying or proceeding with a project. This process allows for a categorization and prioritization of projects;

- *As noted above BC Hydro has created a new Project Delivery Key Business Unit within the Capital Infrastructure Project Delivery Business Group whose purpose is to execute the multi-billion dollar portfolio of large generation, transmission and substation projects; and*
- *BC Hydro has implemented business tools such as Project and Portfolio Management to manage the delivery of our large and complex capital plan on time and on budget.*

CROSS-EXAMINATION BY MR. AUSTIN (Continued):

MR. AUSTIN: Q: This is in relation to the \$65 a megawatt hour as calculated using 100 percent debt. Is it true to say that when that calculation is done that the government is not expecting any return on the risk as owner of BC Hydro that it takes with respect to Site C for a period of 70 years?

MR. REIMANN: A: So the effective result is that Site C would be 100 percent debt finance, so from that perspective that would suggest that that's probably true. I think in overall it's a question of how much the government has as a return on its investment into BC Hydro.

MR. AUSTIN: Q: But for the purpose of Site C it's expecting a zero return on Site C for 70 years.

MR. REIMANN: A: That's right. It would be 100 percent debt finance.

To be successful, BC Hydro needs to be thoughtful, coordinated and disciplined in the delivery of its capital plan. The projects delivered by this group employ a unified and systematic approach based on industry project management practices. Business units with the primary function of supporting the execution of capital infrastructure projects, were assembled into a single business group reporting to the Deputy Chief Executive Officer:

...

- *Site C Clean Energy Project, responsible for the construction of the \$8.3 billion Site C dam and powerhouse by fiscal 2025.*

...

BC Hydro believes that it should assume financial responsibility for controllable risks and create regulatory accounts for non-controllable risks.

....

In its Decision on the Fiscal 2005 - Fiscal 2006 Revenue Requirements Application, the Commission accepted BC Hydro's proposed criteria but concluded that risk/reward considerations were also a relevant criterion. The Commission noted that even if some costs are non-controllable, the risk of variances from forecasts may be appropriately borne by the shareholder because of risk/reward considerations.

Request:

- 7.1 Provide a history of published Site C estimated construction costs for the last 15 years.

- 7.2 Confirm the estimated cost of the Site C dam. (\$8.3 billion, \$8.8 billion, Other?)
- 7.3 Provide a spreadsheet, table and graph of Site C annual nominal and levelized cost for the 75 year depreciation life.
- 7.4 Explain the difference between the 75 years of depreciated life of Site C and the "for more than 100 years" statement.
- 7.5 What corrective actions and customer cost mitigating actions have BC Hydro and the Province planned should the Site C costs increase above the \$8.8 billion cost estimate?
- 7.6 Describe the corrective actions and customer cost mitigating actions that would be taken if for example the Site C cost increased to \$12 billion and also to \$16 billion.
- 7.7 Does BC Hydro consider the cost of Site C to be a controllable risk?
- 7.8 File the following documents:
 - 7.8.1 KPMG LLP 2014 Capital Cost Estimate Review Report
 - 7.8.2 Panel of Independent Contractors 2014 Review Report
 - 7.8.3 Any other Due Diligence Reports as referred to in the Site C Capital Cost Estimate news release
 - 7.8.4 All Due Diligence Reports not listed above.
- 7.9 Confirm that all of the review teams included qualified (relevant experience, education, etc.) engineers, project managers and estimators.
- 7.10 Discuss which large hydro projects, including Manitoba and Newfoundland Labrador, and academic papers BC Hydro reviewed when preparing Site C cost estimates and contingencies.
- 7.11 Was the Site C final design complete when the cost estimate was prepared?

8.0 Reference: BC Hydro 2015 RDA, Exhibit B-1, Appendix C-3B, P 320 of 609; Exhibit B-1, Chapter 5, P 5-74-78; Table 8-6, P 8-24 to 8-27; Electricity Servicing Agreement – February 14, 2013, s. 8.1; 2014; San Diego Energy OutWest Conference "Engaging the Human Factor" and "Quality Program Services", Attachment 8-1, <http://www.energyoutwest.org/conference/2014-conference/2014presentations/>

Topic: DSM and Electricity Affordability

Explanation: ... BC Hydro plans to include information on low income Demand Side Management (DSM) programs.

BC Hydro also provides capacity funding to non-profit housing providers and aboriginal units to assist them to hire someone locally to help promote the ESK

and ECAP programs and collect application forms from tenants and/or members of the community on behalf to the two programs.

Prior to BC Hydro commencing service to Kwadacha Nation as part of the Remote Community Electrification (RCE) program, residential rates were \$0.055/kWh. Now that Kwadacha Nation is in BC Hydro's service area, residential rates average \$0.12-0.13/kWh. Electricity affordability is a key issue where community members rely on income assistance (average \$540 monthly).

Cost of living (including food, supplies, etc.) is higher in remote communities. Remoteness contributes to higher electricity consumption due to the colder climate and the need for such things as freezers to store food since they do not have ready access to grocery stores. Also due to unemployment, multigenerational living and remoteness of the community, residents spend more time in their homes resulting in increased electricity consumption.

Some residents of the NIA communities suffer from financial and emotional stresses as a result of low income combined with high energy costs, payment difficulties and delays in implementing appropriate energy education and retrofit programs.

ZonellRPG is requesting that BC Hydro address the following options and requirements for NIA communities to the extent they are not dealt with the RDA proceeding:

1. Pursue improved internet service with the Province, its shareholder, if necessary and provide internet stations, free of charge, for BC Hydro customers to access their billing and account; including receiving bills and making payments to BC Hydro and for other account issues. In addition, direct BC Hydro to place a priority on implementing these arrangements as soon as possible and take steps that are effective for the 2016-17 heating season.
2. Adjust the bill collection process and late payment charges for remote communities to account for delays in mail delivery for customer bills and bill payments to BC Hydro.
3. Provide a longer period of time for repayment of up to 12 months, as necessary, for Installment Plans.
4. Implement the billing and payment arrangements that BC Hydro already has in place with MSDSI for First Nation. Given that First Nation, the most disadvantaged of the low income group, have not had the benefit of these programs, and as BC Hydro already has these systems in place with MSDSI, ZonellRPG requests that the Commission have BC Hydro place a priority on implementing these arrangements as soon as possible and take steps that are effective for the 2016-17 heating season.
5. Review incentives for DSM as there might be a better incentive model for remote communities that provides multi-year funding based on total lifespan electricity savings such the Transmission Project Incentives that BC Hydro provides its Transmission Rate Customers.
6. Work with organizations to coordinate flexible housing upgrade funding on a priority basis in order to improve home energy efficiency and to be able to implement DSM measures fully.

7. BC Hydro to fund and allow First Nation bands to administer their own DSM programs in the community on a multi-year basis to provide the ability to plan and carry out necessary energy efficiency and home upgrade programs.
8. Develop a customer service group for its remote customers in Zones IB and II in consultation with these stakeholders. Given that the in-person customer service desks at Dunsmuir and Edmonds offices have been operational for some time and there is an upcoming heating season for customers in remote areas, BC Hydro to develop options for face to face assistance, such as Skype, on a priority basis.
9. Given the higher generation costs for customers in Zone II, implement DSM measures on a priority basis and funding that reflects those higher costs as well as the unique remote conditions.
10. Implement monthly billing for its customers in consultation with interested stakeholders with an in-service date effective for the 2016-17 heating season.
11. Provide a single point of contact similar to a Key Account Manager for all First Nation issues. This group does not need to know everything but only needs to be a primary contact, individual or group, to take responsibility to ensure issues are addressed satisfactorily and in a timely manner.

Request:

- 8.1 What options are there for additional DSM programs for First Nation and NIA communities?
- 8.2 Is BC Hydro prepared to provide a BC Hydro key account / energy manager for First Nation communities to focus on DSM and supply options and work with contractors and communities on programs specific to NIAs and First Nation needs in a timely manner?
- 8.3 Provide the BC Hydro position on each of the Zone II IRPG proposals (items 1 to 11) set out above.

9.0 Reference: Exhibit B-1-1, Page 1-6; Page 1-8; Page 1-29, 1-30; Section 2.3.6.2, Page 2-15, Table 2-3

Topic: Customer Service and Rates

Explanation: *BC Hydro's mission is to provide our customers with reliable, affordable, clean electricity throughout B.C., safely. BC Hydro's Fiscal 2017 – Fiscal 2019 Service Plan (found in Appendix E and also discussed in Chapter 2) identifies four key goals that reflect what success will look like when we deliver on our mission:*

1. *Customers will experience reliable electricity and responsive service;*
2. *Rates will continue to be affordable;*
3. *We will fulfill the province's commitment to lead with clean and renewable power; and*
4. *Our workforce and the public will be safe.*

Electric vehicles and home energy management systems are increasing in popularity. Personalized services are becoming the norm, not the exception in all industries. Consequently, we are focusing on how BC Hydro interacts with customers and are adopting a new customer strategy discussed further in

Chapter 5 (section 5.5.1). This strategy includes building a more accessible responsive culture and tone as well as improving service in key customer-facing functions such as interconnections.

1.6.1.1 Making it Easier for Customers to do Business with Us

BC Hydro plans to invest to make it easier for customers to do business with us, recognizing the evolving expectations of customers. Our aim is to provide more accessible and responsive service to our customers, in key function areas such as interconnections, and to adopt a more customer-centric tone and culture.

Examples include:

- BC Hydro is looking to improve basic systems, processes and analytics. Examples are changing bills so that they are easier to read and creating more mobile and self-service tools such as online booking of appointments;
- With investments in Smart Meters, customers have access to more information about their energy use. BC Hydro is now able to deliver more timely information when outages occur and we can more easily facilitate moves and opening of new accounts; and
- BC Hydro is also using social media channels to keep customers informed when there are situations that may impact them such as advance notices of outages.

BC Hydro is proposing additional funding for this priority in fiscal 2017, which is described further in Chapter 5, section 5.5.1.1.

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Customer Rates

BC Hydro has amongst the lowest rates of a major utility in North America. BC Hydro participates in Hydro Quebec's annual comparison of electricity rates and our residential rates, small power rates, medium power rates and large power average prices are the third, fifth, fourth and fifth lowest in North America among the major utilities surveyed, placing all of our rates in the first quartile. Table 2-3 below illustrates the ranking for our residential customers. (Refer to Appendix EE for the Hydro-Quebec 2015 Electricity Rate Comparison Annual Report and BC Hydro's report to Government, which both provide information on the rankings of all of customer classes).

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BC Hydro's Goal 2 is to "Ensure Rates are Among the Most Affordable in North America." BC Hydro's rates are the highest of all the utilities listed in Table 2-3 for consumption above 2,000 kWh.

Request:

- 9.1 Outline how the BC Hydro customer service strategy as outlined applies to remote NIA communities, First Nation communities and low income customers; particularly where there is no reliable and affordable internet available.
- 9.2 Explain how affordable rates will be defined and measured from the perspective of various customer groups, including: residential heating loads, commercial users and industrial users.
- 9.3 Does BC Hydro consider its electricity rates to be low, even in the context rate increases and inflation rates?

- 9.4 What rate would BC Hydro consider to be “affordable” in the context of the current environment?
- 9.5 Provide affordable rate projections to F2019 and beyond to the extent possible, comparing BC Hydro forecast rates to rates of other utilities that BC Hydro compares its rates to.
- 9.6 For Table 2-3, calculate the Residential Customer Class power price (in cents/kWh) based on BC Hydro’s weighted average of electricity consumption for BC Hydro and the peer utilities as shown in this table.
- 9.7 Discuss how BC Hydro meets Goal 2 for high consumption electricity users (above 2,000 kWh) who may have limited or no options available to reduce electricity consumption.

10.0 Reference: Exhibit B-1-1, Page 1-6, Page 1-8; Page 1-20, 1-21; Page 10-2; Page 10-13 – 15; Page 1-42

Topic: Customer Oriented Culture, DSM

Explanation: *Electric vehicles and home energy management systems are increasing in popularity. Personalized services are becoming the norm, not the exception in all industries. Consequently, we are focusing on how BC Hydro interacts with customers and are adopting a new customer strategy discussed further in Chapter 5 (section 5.5.1). This strategy includes building a more accessible and responsive culture and tone as well as improving service in key customer-facing functions such as interconnections.*

BC Hydro is moving to a more customer-oriented culture and a renewed focus on our everyday interactions with our customers. The former Customer Care Key Business Unit has been integrated with the former Transmission and Distribution Business Group, and now renamed the Transmission, Distribution and Customer Service Business Group.

BC Hydro has also created a new Operations and Business Support Group combining demand-side management, energy planning and economic development, business planning and risk, policy and regulatory, communications and human resources functions under the guidance of a Chief Human Resources Officer and Senior Vice-President of Corporate Affairs. This change is intended to ensure a coordinated approach to energy and business planning, with emphasis on our corporate priorities that are discussed in section 1.6.1 below.

BC Hydro’s Demand-Side Management Plan continues investments in areas such as capacity-focused conservation, including a load curtailment pilot program for large industrial customers. BC Hydro is also increasing its focus on measures that provide new tools, information and technologies to customers to help them make use of available energy data, including from smart meters, to make smart choices about their energy consumption. By having access to information more specific to them, customers can make informed choices and save money.

10.3.3 Company-Wide Priorities

Our vision is “to be the most trusted, innovative utility company in North America by being smart about power in all we do”. Three of the company-wide priorities form part of the framework for planning demand-side management for the fiscal 2017 to fiscal 2019 period:

- *Explore the full potential of energy conservation;*

- *Make it easy for customers to do business with us; and*
- *Continue to improve the way we operate.*

The company-wide priority of “exploring the full potential of energy conservation” speaks to an expanded demand-side management scope that aligns with the action items of the 2013 Integrated Resource Plan.

Request:

10.1 Outline the BC Hydro strategy and culture in the context of customer service and DSM programs in remote NIA communities including how BC Hydro will meet the needs of the remote NIA communities and First Nation.

11.0 Reference: Exhibit B-1-1, Page 1-11; , Page 2-11; Page 5-112, 113; Page 5-122 – 124; Page 5-153; Attachment 11-1, Vancouver Sun, September 29, 2016, <http://vancouversun.com/opinion/opinion-bc-hydro-and-duty-of-care> ; <https://par.ccab.com/>

Topic: Commitment to First Nations

Explanation: *BC Hydro’s Statement of Aboriginal Principles set out in Chapter 5 (section 5.6.5) guides our dealings with First Nations. The legal landscape with regard to First Nations is changing and First Nations expectations are rising with respect to how BC Hydro addresses their priorities. BC Hydro’s operating footprint will continue to expand on traditional First Nations territory as it continues to build and fulfill the capital plan. BC Hydro must work to ensure that the Crown meets its legal obligation to consult, mitigate impacts, and if necessary accommodate, First Nations in circumstances where BC Hydro’s proposed actions have the potential to impact a First Nation’s asserted rights or title. BC Hydro’s dealings with, and commitments to, First Nations are discussed further in Chapter 5, section 5.6.5 and Chapter 6, section 6.4.3.*

.....

2.3.6.1 Goal 1 - Set the Standard for Reliable and Responsive Service. We will Evaluate Ourselves Using Four Performance Measures: SAIDI, SAIFI, Key Generating Facility Forced Outage Factor, a CSAT Index and the Attainment of a Gold Progressive Aboriginal Relations Designation

The following measures are important to assess performance in generation and system reliability compared to other peer utilities; to consistently be responsive to our customers; and to recognize the importance of proactive First Nations engagement and partnerships.

.....

5.6.1 Capital Infrastructure Project Delivery – Business Priorities

Over the test period, the Capital Infrastructure Project Delivery Business Group will be focusing on the following company-wide priorities:

...

- *Building trusting and mutually-beneficial relationships with First Nations.*

5.6.1.2 Building Trusting and Mutually-Beneficial Relationships with First Nations

BC Hydro recognizes that building relationships that address the interests of First Nations is critical to successfully fulfilling BC Hydro's mission to provide our customers with reliable, affordable, clean electricity throughout BC, safely. As we make capital investments, we are mindful of First Nations communities around the province. BC Hydro is committed to remaining a leader in aboriginal relations by continuing to build and strengthen relationships with First Nations.

Through early engagement and emphasizing collaboration, respect and mutually beneficial relationships, First Nations will see improved transparency and their interests incorporated into BC Hydro operations and the delivery of our capital projects. These interests can include employment, environmental stewardship, and business development.

BC Hydro's commitment to Aboriginal relations is summarized by its Statement of Aboriginal Principles, introduced in 2015.

OUR COMMITMENT

At BC Hydro, we exist to serve British Columbians with clean, reliable and affordable energy. We recognize that this system has impacts on the lives and interests of First Nations communities. We are committed to working together and to building relationships that respect these interests.

Through our Statement of Aboriginal Principles, we commit that:

1. We will always operate safely and protect the safety of individuals.
2. We will inform First Nations communities, to the best of our ability, of our multi-year planning, identifying potential projects and works as early as possible for discussion.
3. We will strive to provide the most clear, accessible and transparent information possible.
4. We will seek advice on First Nations perspectives on how to best reduce or avoid impacts on the environment, cultural heritage and social needs.
5. We will be accessible and open to understanding the unique interests of First Nations in relation to our operations.
6. We will respect that our perspectives may be based on different world views.
7. Where we are refurbishing existing facilities and assets, or building new infrastructure, we will seek opportunities for meaningful benefit to local First Nations communities.
8. We will seek solutions to improving the accessibility of clean reliable and affordable power to First Nations communities in remote areas of the province.
9. We will deliver leading employment and training programs to attract and support First Nations individuals to become an increasing part of the BC Hydro workforce.
10. We will deliver on our commitments and we will be open and transparent if something is standing in the way of our mutual success.

BC Hydro is sincere in its commitment to ensure these principles are understood and acted upon by everyone in our organization, including contractors.

Community Relations

Community Relations interacts with mayors, councillors and regional district officials and community leaders in over 160 communities. In addition, it is the primary local contact for all 85 Member of the Legislative Assembly constituency offices and maintains relationships with regional media. This team also works with other stakeholders including business groups, other utilities and crown corporations, customers and community organizations when there is an interest in or concern about BC Hydro activities.

.....

10.5.3 Programs

The Demand-Side Management Plan includes a suite of demand-side management programs that deliver a mix of information, access to efficient technology and services, technical assessment and support, and financial assistance to all customer classes, to address barriers to cost-effective energy efficiency and conservation. The demand-side management programs are designed to capture additional demand-side management potential that remains beyond that obtained from codes and standards and rate structures. In addition, programs are designed to complement rates structures and are critical in setting the stage for changes to codes and standards.

Sector enabling activities, such as trade ally support and training, support the residential, commercial and industrial sector programs in achieving their savings.

Request:

- 11.1 Confirm that the commitment by BC Hydro is primarily or even solely based on facilities and access and not on day to day operations, customer service and relationships.
- 11.2 Confirm whether or not the Community Relations interaction includes First Nation communities and identify those First Nation communities BC Hydro regularly interacts with.
- 11.3 Describe the nature of the interactions.
- 11.4 Provide references from Exhibit B-1-1 that discuss the BC Hydro actions with respect to day to day interactions with First Nation communities and customers.
- 11.5 Explain how and why reliable and responsive service and the Gold Progressive Aboriginal Relations Designation are linked and combined as Goal 1.
- 11.6 Confirm that no other reference to the Gold Progressive Aboriginal Relations Designation is made in Exhibit B-1-1.
- 11.7 Provide an explanation of the Gold Progressive Aboriginal Relations Designation, how it is attained, how BC Hydro performance will be measured and who grants the designation.
- 11.8 Outline the actions that BC Hydro has or is planning to undertake to attain the Gold GPA designation.

12.0 Reference: Exhibit B-1-1, Page 1-15; Page 4-11

Topic: Water Rental Rates, Water Rentals & Property Taxes

Explanation: • **Water Rental Rates:** In fiscal 2018 the Tier 3 water rental rate will be eliminated and this is reflected in the revenue requirements sought in the Application;

Request:

- 12.1 Provide a comparison of water rental rates in British Columbia to other Canadian jurisdictions that have water rentals.
- 12.2 Provide an estimate of the water rentals paid on each of the WAC Bennett Dam and the Peace Canyon Dam since inception of water rentals.

- 12.3 Provide an estimate of Property Taxes or Payments in Lieu paid on each of the WAC Bennett Dam and Peace Canyon Dam since taxes were first paid on the dams.
- 12.4 Confirm that no taxes have been or are paid to First Nation displaced by the Peace River Dam.

13.0 Reference: Exhibit B-1-1, Page 1-17, 1-18

Topic: Rate Increases, Rate Smoothing Regulatory Account

Explanation: *The final five years of the 2013 10 Year Rates Plan target rate increases of 2.6 per cent in each of fiscal 2020 to fiscal 2024, subject to British Columbia Utilities Commission review and approval. The 2013 10 Year Rates Plan also includes fully recovering the balance in the Rate Smoothing Regulatory Account at the end of fiscal 2024.*

Request:

- 13.1 Provide the effective rate rider percentage through the 10 Year Rates Plan after rate increases are applied to the 5% rate rider.

14.0 Reference: Exhibit B-1-1, Page 2-20-22

Topic: Regulatory Framework

Explanation: Table 2-6 sets out Key Regulatory Statutes and limits on the BCUC.

Request:

- 14.1 Describe the areas where the BCUC has regulatory oversight and can allow or deny cost recovery.

15.0 Reference: Exhibit B-5, BC Hydro RDA, Zonell IR 1.9.1; Attachments 15-1, Fort Ware Internet & Cellular, BC Service Locations, Fort Ware & Area Financial Institutions; Attachment 15-2, https://www.canadapost.ca/web/en/products/details.page?article=moneygram_and_posta

Topic: BC Hydro Account & Customer Service Access

Explanation: See also ZonellIRPG IR 1.9.1.

In the BC Hydro RDA proceeding, the following evidence was provided:

Mr. Sanders: A: To the first question, I would agree that it is not – to my knowledge, it's not available everywhere. I would point out looking at this particular map that this is based on independent internet service providers that have submitted their information to NetworkBC. So I don't know specifically beyond that.

I am aware there is cellular internet coverage in Fort Ware for the Band office and administration offices. I do not know how far beyond that it goes into the community.

Canada Post MoneyGram bill payment service

Pay for utilities⁸, phone services and more with same day or next day service.

- Same day bill payment is a premium service that notifies the billing company of customer payment in minutes.⁷
- Next day bill payment is a lower priced bill payment option if you don't need payment to be received as quickly.⁷
- Proof of payment guaranteed.⁷
- Low flat fees start at \$3.99.³
- Biller⁸ notified in as little as 10 minutes.³
- View [available billers](#).

Request:

15.1 Please confirm that:

15.1.1 There is only satellite internet available in Fort Ware.

15.1.2 There is no cellular service in Fort Ware.

15.1.3 There is no Service BC office in Fort Ware.

15.1.4 There are no financial institutions in Fort Ware.

15.1.5 BC Hydro bill payments can be made through Canada Post.

15.1.6 Bill payments to BC Hydro through Canada Post cost a minimum of \$3.99 to \$9.99 and up.

16.0 Reference: Exhibit B-1-1, Page 3-33, 34; Page 3-44; BC Hydro RDA, Transcript Volume 4, Page 592

Topic: DSM Savings / Expenditure Reductions

Explanation: Demand-Side Management Savings: *Demand-side management continues to be a key resource in the Load Resource Balance and there have been changes since the 2013 Integrated Resource Plan:*

- *First, energy savings from conservation rate structures have been less than forecasted, but energy savings from codes and standards have increased. In particular, customers' response to the Large General Service and Medium General Service two part baseline rates was considerably lower than forecasted in the 2013 Integrated Resource Plan. Most of the energy savings forecast from the Large General Service and Medium General Service rates occurred prior to fiscal 2015 and are reflected in actual sales; and*
- *Second, BC Hydro has determined that it is appropriate to continue a strategy of moderation of demand-side management spending through fiscal 2017 to fiscal 2019 (refer to section 3.4.3.1 for more details). This moderation strategy has been extended as an assumption for years fiscal 2020 and beyond (i.e., relatively constant expenditure levels, adjusted for inflation). Actual expenditure levels (and the resulting energy savings) for fiscal 2020 and beyond will be determined in the 2018 Integrated Resource Plan and subsequent applications for expenditure schedules under section 44.2 of the Utilities Commission Act.*

.....
Recommended Action 10 in the 2013 Integrated Resource Plan was:

Advance a set of actions that will support a healthy, diverse clean energy sector and promote clean energy opportunities for First Nations' communities.

Request:

- 16.1 Provide a schedule of original budget, amended budget and changes (increases / decreases) to DSM expenditures for direct program expenditures and administrative / overhead expenditures.
- 16.2 Provide a schedule of original, amended and changes to DSM expenditures in the NIAs and for First Nation communities.
- 16.3 Identify the specific actions taken since the 2013 IRP on First Nation opportunities.
- 16.4 Has BC Hydro included load growth in Fort Ware for greenhouses, fuel stop, biomass facility and new housing in the RRA and DSM forecast?
- 16.5 Has BC Hydro pursued waste heat recovery and CO2 recovery for remote community greenhouses and community energy systems?

17.0 Reference: Exhibit B-1-1, Page 7-48 - 49

Topic: Deferral and Regulatory Accounts

Explanation: Table 7-8 sets out the various accounts and whether interest is applied.

Request:

- 17.1 For each account identify in a separate column whether there is an equity return applied / earned.

18.0 Reference: Exhibit B-1-1, Page 10-19 - 20; Section 4.4.2.4, Page 4-25

Topic: DSM Tests, NIA Avoided Energy Cost

Explanation: *In addition to using the long-run marginal cost as the avoided cost stream to determine cost-effectiveness, BC Hydro added an extra Utility Cost Test screening filter using the B.C.-border sell price forecast as the avoided energy cost stream (which is approximately \$36 per MWh) in order to prioritize demand-side management investments. This ensures that even surplus energy resulting from demand-side management would have a positive impact on BC Hydro's revenue requirements, because the utility cost of demand-side management would be less than the wholesale market price.*

Any demand-side management initiative that did not pass the Total Resource Cost Test (at long-run marginal cost) and did not pass the Utility Cost Test at the value of \$36 per MWh was investigated for modifications to pass these tests, with the exception of the demand-side measures initiatives specified in section 3 of the Demand-Side Measures Regulation.

Our assessment framework also included the attributes listed below. These attributes were considered in reviewing each initiative to determine whether it should be included, adjusted or cancelled in the Demand-Side Management Plan (these attributes were not applied in any particular order):

...

- *Maintaining flexibility (to ramp up) through sustaining energy conservation presence and relationships with customers and suppliers (e.g., the BC Hydro Alliance of Energy Professionals);*
- *Supporting priority BC Hydro and government initiatives and strategic objectives (e.g., explore the full potential of energy conservation, and customer strategy);*
- ...
- *Providing broad access and coverage to conservation programs and information across each customer sector;*
- *Limiting missed opportunities for demand-side management customer projects;*
- ...

The cost-effectiveness tests and the other components of the framework ensure that the proposed fiscal 2017 to fiscal 2019 demand-side measures expenditures are beneficial to customers in that the expenditures will not increase BC Hydro's revenue requirement, are cost-effective compared to supply-side resource options, and provide access and coverage to conservation programs and information for each customer sector so that customers have the opportunity to reduce their electricity bills.

Non-Integrated Area communities are served by local generating facilities and distribution networks. Generating capacity in these areas is provided by a combination of diesel and hydro facilities. BC Hydro purchases approximately one-third of the energy supplied in these areas from IPPs.

Request:

- 18.1 Provide the range of Utility Costs for NIA diesel generation.
- 18.2 Provide the range of Utility Costs for NIA IPP generation.
- 18.3 Provide the NIA diesel generation avoided cost per MWh.
- 18.4 Provide the NIA IPP generation avoided cost per MWh.
- 18.5 Explain how the current NIA and remote First Nation DSM programs align with the attributes in the assessment framework.

19.0 Reference: Exhibit B-1-1, Page 10-1, Table 10-1, Page 10-26

Topic: Fiscal 2017 to Fiscal 2019 DSM Expenditure Schedule

Explanation: *Table 10-2 includes the expenditures on demand-side measures that we anticipate making over the fiscal 2017 to fiscal 2019 test period as part of its Demand-Side Management Plan.*

Table 10-1 Fiscal 2017 to Fiscal 2019 Demand-Side Measures Expenditure Schedule

	Demand-Side Measures Expenditures (\$ million)
F2017	113.7
F2018	104.8
F2019	100.7
Thermo-Mechanical Pulp (F2017-F2019)⁶⁴	55.8
Three-Year Total	375.0

The Minister confirmed Government’s support for demand-side management expenditures averaging \$125 million per year for the fiscal 2017 to fiscal 2019 test period, and also confirmed that Government understands that as a result of these changes, BC Hydro will achieve a lower level of electricity savings than was established in the 2013 Integrated Resource Plan.

Request:

- 19.1 Provide DSM expenditures for each of Zones I, IB and II.
- 19.2 Provide low income DSM expenditures for each of Zones I, IB and II.
- 19.3 Provide actual DSM expenditures for the last 5 years for each of Zones I, IB and II.
- 19.4 Provide actual DSM low income expenditures for the last 5 years for each of Zones I, IB and II.
- 19.5 Has BC Hydro has had any stakeholder discussions on planned “DSM expenditures for F2017 to F2019” and the “lower level of electricity savings”. If so, please provide any reports, summaries, etc. of customer feedback.

20.0 Reference: Exhibit B-1-1, Page 10-23, Page 10-27, Page 10-28, Appendix V, First Nations Strategies, Page 3

Topic: DSM Analysis, Alignment with B.C.’s Energy Objectives

Explanation: *All three alternatives meet the B.C. energy objective of BC Hydro reducing its expected increase in demand for electricity by the year 2020 by at least 66 per cent based on the mid load forecast without load from liquefied nature gas projects.*

To encourage the switching from one kind of energy source or use to another that decreases greenhouse gas emission in B.C.

To encourage communities to reduce greenhouse gas emission and use energy efficiently.....Support will also be provided to First Nations communities for energy efficient housing and community buildings and on the development and implementation of energy efficient housing policies and community energy plans.

There are unique geographic and market barriers that affect First Nations and remote communities. In order to address these unique barriers, BC Hydro is focusing on activities that will:

- *Support education and skills training to build energy literacy in the community.....*
- *Facilitate access to opportunity assessments and energy efficient upgrades for homes...*
- *Support the development and implementation of energy efficient housing policy...*
- *Support the development of community energy plans...*
- *Pilot a targeted Low Income offer to First Nations communities*

Request:

- 20.1 Is the 66% target by the year 2020 is based on the entire BC Hydro system.
- 20.2 What is the 2020 target for the NIA communities for each of Zones IB and II?
- 20.3 What impact on demand and revenues will energy source switching have on BC Hydro?
- 20.4 What specifically is meant by “support” provided to First Nations communities and “facilitate”?
- 20.5 How will current restrictions and barriers to DSM and energy efficiency upgrades be addressed?
- 20.6 What actions has BC Hydro undertaken and will BC Hydro be undertaking in NIA communities to reduce GHG emissions from diesel fired generation and lower generation costs? Provide any specific details, reports, analysis of “First Nations Strategies”.
- 20.7 Provide specific details, reports, analysis on the Low Income pilot, such as program details, MWh of energy savings, costs, etc.
- 20.8 How will the success of the Low Income pilot be measured and how and when will a decision be made to extend the Low Income program to other First Nations communities?

21.0 Reference: Exhibit B-1-1, Page 10-52, Table 10-14

Topic: Key Performance Indicators for Residential Initiatives

Explanation: BC Hydro provides the following Key Performance Indicators for Residential Initiatives for Low Income in Table 10-14, as shown below:

Demand-Side Management Initiative	Key Performance Indicators	
Residential	Leading	Lagging
Behaviour	<ul style="list-style-type: none"> • Team Power Smart members • Number of customers with MyHydro Profile and BC Hydro Account linked to it 	<ul style="list-style-type: none"> • Challenge participants • Energy savings • Costs • Number of times Energy Visualization Portlet application of account accessed energy savings • Customer surveys
Retail Program	<ul style="list-style-type: none"> • Participation of and feedback from key retailers • Tracking of qualifying models • Collection of retail stocking and price point information 	<ul style="list-style-type: none"> • Participants • Energy savings • Costs • Customer surveys • Retailer/manufacturer surveys
Low Income	<ul style="list-style-type: none"> • Distribution of Energy Savings Kits • Contractor crews engaged 	<ul style="list-style-type: none"> • Participants • Energy savings • Costs • Customer surveys
Home Energy Rebate Offer	<ul style="list-style-type: none"> • Identified customer interest • Feedback from contractors 	<ul style="list-style-type: none"> • Participants • Energy savings • Costs • Customer surveys • Contractor surveys

Request:

- 21.1 What are the Leading and Lagging Key Performance Indicators for ECAP under the Low Income DSM initiative?
- 21.2 What are the Leading and Lagging Key Performance Indicators for ECAP for NIAs and remote First Nation communities?
- 21.3 Provide an example of the ECAP energy savings calculation.