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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)

Craig McInnes

Date:

October 20, 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.

Like most British Columbians, I am a consumer of electricity, which means I must buy electricity from B.C. Hydro. As a result, I am hurt by the two-tier electricity rate system, which is both ineffective in its stated purpose of encouraging conservation and indiscriminately punitive for many BC Hydro customers. The policy fails to achieve its stated goal of conservation because while it does provide an incentive to use less, it does not differentiate between the reasons certain customers use more than others. The rate is based on use per meter, rather than per capita consumption. As a result, a household of four persons is more likely to invoke the higher tier rate even when they use far less on a per capita basis as a result of their conservation efforts than is a household of one or two persons. If that same household of four were to split into two households of two people each, they could consume more electricity and still stay within the lower tier. So the two-tier policy punishes large families, multifamily homes and homes with secondary suites that don't have a separate meter. The policy also discourages the use of electricity for heating and hot water. As a result, alternate fuels that in British Columbia are more damaging to the environment become, on a financial basis, the preferred choice. The two-tiered policy also fails to take into account seasonally-driven differences in consumption rates. So consumers are punished with higher rates at times when it is most difficult to use less, i.e. primarily during the winter when there are fewer daylight hours and colder temperatures. In short, the two-tiered electricity rate system should either be vastly overhauled to take into account per-capita and seasonal consumption, or it should be scrapped.