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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

British Columbia Utilities Commission Residential Inclining Block Rate Report to the
Government of British Columbia ~ Project No.3698845

Are you currently registered as an intervener or interested party?

No

Name (first and last)

Mark Turner

City

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Province

BC

Email

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Phone number

[REDACTED]

Letter of Comment

Name (first and last)

Mark Turner

Date:

23-Nov-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.

Questions 1 and 3 posed by the Minister to start this investigation make direct reference to customers who do not have access to natural gas infrastructure in their area. Our household is in this situation and is significantly impacted by the residential inclining block rates as a result. In the period between September 17, 2014 and September 15, 2016 we were charged approximately \$2900 for our usage above the tier 1 baseline. Of that about \$965 was due to the inclined rate differential. Not only are we paying more for the added cost of heating with electricity as opposed to natural gas, the RIB rate sees us paying a lot extra for the privilege.

In reading the submission by BC Hydro I'm surprised at their answer to question 1 where they are not certain if the inclining rate is causing a cross-subsidy between those without access to natural gas and those with. In our case our summer BC Hydro bills are within a few dollars of the tier 1 limit. If we had access to natural gas for space and water heating, the rest of year we would remain at tier 1 rates of electricity use as well, just as in our previous, gas-equipped home. In the discussion of question 3 BC Hydro says this about customers using higher amounts "that high use customers as a group, regardless of income or access to natural gas, have a higher proportion of factors that result in more intensive use of energy, relative to the non-high use group". Sitting here in an 1100 square foot rancher and looking at a list of factors that includes swimming pools and larger dwelling types I feel perhaps we don't quite fit their generalization.

In cases where electricity use is vastly different between summer and winter billing cycles it must be fairly obvious to anyone who looks at the trends the direct relationship to heating. Without natural gas as an option, our only real means to reduce the electricity consumption is to burn wood for heat. This doesn't seem to reflect the environmental direction the government seems to be targeting.

I recommend that customer access to natural gas should be considered as part of the pricing equation in any program designed to incentivize conservation. It must be possible to determine which customers fall within those areas, especially since both BC Hydro and Fortis BC are involved in this Proceeding. At a minimum, BC Hydro has the billing data that should give them a good estimate who is using electricity for heat and who is not.

If natural gas is not available I believe there should at least be a sliding scale in the non-summer seasons where the second tier begins at a much higher level. If that is not feasible, then perhaps the incline point should be simply increased throughout the year for homes without natural gas access.

Mark Turner

