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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)

Kevin LePape

Date:

10-May-17

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.

I have read the responses from Nelson Hydro to the questions posed by the BCUC and note the vagueness and evasion and outright failure to answer many questions. The excuse about moving to a new accounting system is pretty funny: if they cannot answer the questions posed because of their current accounting system then I question the accuracy of anything Nelson Hydro says.

To wit: there are many holes to drive through but I will highlight one that is minor in financial magnitude but entirely indicative of the general behavior and attitude of the administration and management of Nelson Hydro and the City of Nelson. The project referred to as the "Nelson Community Solar Garden" was approved by the BCUC upon the basic premise that it would be fully participant funded excepting the initial \$25,000 for study/engineering/promotion provided from Nelson Hydro revenues. In fact, Nelson Hydro has constructed the program such that it will unquestionably NOT be participant funded.

The participants are paying a fixed fee up front for the power generated by solar panels. There is absolutely NO mechanism or process for the participants to pay for future maintenance, repair or replacement of any part of the installation or operation of the Solar Garden. In fact Nelson Hydro has stated that Nelson Hydro (or more accurately the customers who did not buy into the Solar Garden) will underwrite an estimated \$2000/year of maintenance costs for the 25 year contract.

Not only is this \$50,000 in contravention of the terms of approval from the BCUC, the number is so understated that it's laughable. I have asked Alex Love in writing directly via email and in public via letter to the editor of the Nelson Star to provide some/any backup to this \$2000/year number. He has declined to provide any answer on any occasion. The simple basic maintenance comprising the removal of snow and the mowing of weeds will easily require 200 hours or more per year. Where does Nelson Hydro plan to find \$10/hour labour? And the union isn't going to allow non-union labour so it's going to be \$35/hour plus. And that doesn't even begin to touch the large cost electrical repairs and replacement of the inevitable failures of out-of-warranty components or the cost of decommissioning at end-of life.

So I repeat, the estimate of \$2000/year is so far out of reality as to be considered fraudulent. And again, Nelson Hydro has declined to answer any questions about this on multiple occasions.

There are bigger issues and financial ramifications in Nelson Hydro's responses to the BCUC. I would respectfully suggest that the BCUC accept only audited, third-party verification of ANYTHING coming from Nelson Hydro and/or Nelson City council.