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## 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](mailto: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

FortisBC Inc. Community Solar Pilot Project Application ~ Project No.1598911

Are you currently registered as an intervener or interested party?

No

Name (first and last)

Andrew Shadrack

City

[REDACTED]

Province

BC

Email

[REDACTED]

Phone number

[REDACTED]

# Letter of Comment

Name (first and last)

Andy Shadrack

Date:

11-Jul-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.

[REDACTED]

[REDACTED]

Monday July 10th

British Columbia Utilities Commission,  
Sixth Floor, 900 Howe Street, Box 250  
Vancouver, B.C.,  
V6Z 2N3

Attention: Patrick Wruck, Commission Secretary

Dear Sir:

Re: FortisBC Inc. Community Solar Pilot Project Application ~ Project No.1598911

This is to advise that I am not an intervenor in this hearing as there are simply not enough hours in the day for me to intervene in a third hearing before this Commission on essentially the same subject that I am currently actively engaged in, but I am submitting a letter of comment to these proceedings.

First I wish to reference this panel to Information Request responses as found in C10-8 of FortisBC Inc. 2016 Long Term Electric Resource Plan (LTERP) and Long Term Demand Side Management Plan (LT DSM Plan) ~ Project No.3698896, with specific reference to BCUC IR#1.1.3.

Further I encourage the Commission panel to obtain a copy of the Community Energy Association's Regional District Central Kootenay Area D and Kaslo Green Energies Opportunity Scan of December 2016 in which it is stated:

"The Kaslo Aerodrome was also evaluated and discounted. The aerodrome has good solar potential but the potential business model was poor. The aerodrome is located in the Fortis Electric area and Fortis's net metering program is designed to reduce electric demand and not generate revenue. There is no customer identified on site that could benefit from the solar electricity produced it was deemed not appropriate at this time. This should be re-evaluated in the event significant development takes place at the aerodrome".

I find it wholly inappropriate for the Commission to be considering a FortisBC application to build a solar PV farm in Kelowna for the Company's own needs and purposes, when net metering customers and others (including local government) have been waiting years for FortisBC and the Commission to ensure that the Company has an appropriate overall policy for renewable energy development in accordance with section 2(l) of the Clean Energy Act.

Unlike BC Hydro, FortisBC has no Standing Offer Program (SOP) to speak of, certainly no Micro-Standing Offer Program (MSOP), and it has been actively engaged in trying to dissuade customers from investing in its net metering program

for over a year now. As I said above, these one-off decisions about FortisBC's net metering tariff, and now their solar PV farm application, are wholly inappropriate when the Company has absolutely no comprehensive policy towards renewables and customer engagement when it comes to customers partnering with the Company to produce renewable energy.

In principle I have no objection to FortisBC building a solar PV pilot project in the Okanagan, especially given that the Company has no generation capacity in that region of the service area. However, one has to give one's head a shake at the optics of the Company simultaneously making first an application, then a reconsideration application to lower the price of purchase for net metered power from its own customers (down from retail rate to 4.3 cents per kWh), while at the same time proposing to sell electrical power to its customers from its own solar PV farm at 23.1 cents per kWh.

Does the Commission not think that FortisBC should first have a comprehensive policy towards renewable energy production - one that involves discussion with its own customer generators? Our household, for example, has been a customer of FortisBC and its predecessors since August 1987, has been enrolled in FortisBC's net metering program since April 2015, and yet not once has FortisBC ever had the courtesy to contact us and ask us directly about what we think of their program and the changes they wish to make to their net metering program.

In contrast BC Hydro has sought the opinion of its customer-generators and sends out regular email updates. Is it the intention of the Commission to allow a bifurcated policy within British Columbia towards renewable energy development, because that is where we are headed at this time.

All of which is respectfully submitted,  
Andy Shadrack