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July 24, 2017

Mr. Patrick Wruck
Commission Secretary and Manager
Regulatory Support
British Columbia Utilities Commission
Suite 410, 900 Howe Street
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Dear Mr. Wruck:

**RE: British Columbia Utilities Commission (BCUC or Commission)
British Columbia Hydro and Power Authority (BC Hydro)
Customer Emergency Fund Application (the Application)**

In accordance with Commission Order No. G-5-17, BC Hydro provides a proposal for the establishment of a Customer Emergency Fund Pilot Program (**CEF Pilot**), and specifically applies, pursuant to sections 58 to 61 and 49(a) of the *Utilities Commission Act (UCA)*, for the following Commission orders necessary to implement the CEF Pilot:

- Approving Rate Schedule 1903 (**RS 1903**), which establishes the proposed Customer Emergency Fund Rate Rider (**CEF Rate Rider**), to be effective June 1, 2018 and amending Rate Schedule 1901 (**RS 1901**) to exclude the application of the Deferral Account Rate Rider to the CEF Rate Rider charge;
- Approving certain related changes to BC Hydro's Electric Tariff (**CEF Tariff Changes**), to be effective June 1, 2018; and
- Approving the establishment of a new regulatory account (**Customer Emergency Fund Regulatory Account**), to be effective the date of the Commission's order.

The CEF Pilot has been referred to in Order No. G-5-17 and elsewhere as a "crisis intervention fund" program. The name was changed to reflect the purpose of the fund and to align with the fact that the program is available to all residential customers who meet the program criteria.

The proposed CEF Rate Rider is \$0.0082/day¹ to be applied to all residential accounts, with two exceptions discussed in section 2.2 of the Application. The revenues generated through the CEF Rate Rider would be used to fund the CEF Pilot. Under the CEF Pilot, BC Hydro will credit the accounts of qualifying residential customers with an amount that would reduce or eliminate their arrears. This, in combination with a payment plan where appropriate, is hoped to enable customers to maintain their BC Hydro service.

¹ Equivalent to 25 cents /month, on average.

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As program participation and costs of the CEF Pilot could vary from forecast and as there will be variations in the timing of revenues and costs over the duration of the CEF Pilot, BC Hydro proposes that the net difference between the revenues collected under the CEF Rate Rider and the incremental costs related to the CEF Pilot in each fiscal year be transferred to the proposed Customer Emergency Fund Regulatory Account. Any remaining balance in the Customer Emergency Fund Regulatory Account at the end of the CEF Pilot would be to the account of residential ratepayers. This will ensure that residential ratepayers only pay the actual net CEF costs.

Subject to the Commission issuing the requested orders, BC Hydro plans to run the CEF Pilot for two years, commencing June 1, 2018 to June 1, 2020. We may request an extension to the CEF Pilot depending on the benefits and costs of the CEF Pilot.

To meet the target implementation date of June 1, 2018, BC Hydro requests that the Commission issue the requested approval by the end of December 2017. Key activities that are required to start in January 2018 include designing and implementing changes to BC Hydro's billing system (to collect the CEF Rate Rider and to apply credits to customer accounts), developing a network of agencies throughout the province (to create awareness of the program and also to provide customers with assistance in completing their applications), establishing the operational teams required to process and adjudicate applications, and testing the approved CEF Rate Rider input in the billing system. A proposed regulatory process that would allow the target implementation date to be met is set out at section 8 of the Application.

However, in the event that the Commission cannot issue the approvals requested by the end of December 2017, BC Hydro seeks, pursuant to sections 89 and 90 of the UCA, an interim approval of the orders requested by that day.

For further information, please contact Anthea Jubb at 604-623-3545 or by email at bchydroregulatorygroup@bchydro.com.

Yours sincerely,



Fred James
Chief Regulatory Officer

jc/ma
Enclosure (1)

Customer Emergency Fund Application

July 2017

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1 Introduction

2 In accordance with Order No. G-5-17, BC Hydro provides a proposal for the
3 establishment of a Customer Emergency Fund Pilot Program (**CEF Pilot**), and
4 requests orders as summarized in section [7](#) below. The following sub-sections
5 provide some background leading up to the filing of this application and an overview
6 of the CEF Pilot.

7 1.1 2015 Rate Design Application (2015 RDA)

8 After 18 months of customer and stakeholder engagement, BC Hydro filed its
9 2015 RDA on September 24, 2015. The resulting regulatory proceeding included
10 two rounds of information requests as well as a five-day oral hearing. The
11 evidentiary phase of the proceeding closed on October 24, 2016. On
12 January 20, 2017 the British Columbia Utilities Commission (**Commission or**
13 **BCUC**) issued Order No. G-5-17 and an accompanying decision (**2015 RDA**
14 **Decision**).

15 One of the most significant issues in the 2015 RDA was whether the Commission
16 has the legal jurisdiction to establish preferential rates for low-income customers in
17 the absence of an economic or cost-of-service basis for such rates. The Commission
18 concluded that it had no such jurisdiction.¹

19 1.2 Customer Emergency Fund

20 Order No. G-5-17 refers to a crisis intervention fund (**CIF**) program. In BC Hydro's
21 development of the pilot program the name was changed to CEF Pilot to reflect the
22 purpose of the fund and to align with the fact that the program is available to all
23 residential customers who meet the program criteria.

24 In the context of a residential CEF as proposed in the 2015 RDA by an intervener,
25 the British Columbia Old Age Pensioners Organization et al (**BCOAPO**), the

¹ 2015 RDA Decision, page 80. This aspect of the decision is currently under appeal.

1 Commission accepted BC Hydro's submission that it has no role in establishing
2 social assistance programs in the province. The Commission went on to say,
3 nonetheless, that a CEF "*would not amount to a social assistance program if it*
4 *generates a utility benefit sufficiently justifiable on an economic or cost of service*
5 *basis.*"² Further to that conclusion the Commission directed BC Hydro to submit a
6 proposal for, on a pilot basis, a "... *crisis assistance pilot program for residential*
7 *customers who have arrears with BC Hydro and are unable to pay their electricity*
8 *bills...*".³ The Commission also indicated on a preliminary, non-binding basis that it
9 would approve a modest residential monthly surcharge - a rate rider - to allow for the
10 funding of such a pilot.⁴

11 In Order No. G-5-17 and the applicable sections of the 2015 RDA Decision, the
12 Commission indicated that the objective of the CEF was to allow for an assessment
13 of whether the program is "sufficiently justifiable on an economic or cost of service
14 basis."⁵ The Commission also indicated a number of elements that would be
15 required in any pilot program that it would be willing to enable through a dedicated
16 rate rider, such as:

- 17 • The rate rider should be applicable to all residential customers, including
18 low-income customers;⁶ and
- 19 • The pilot program funding should be available to those residential customers
20 who "have arrears with BC Hydro and are unable to pay for their electricity
21 bills".⁷

22 The Commission expected that BC Hydro would work collaboratively with the
23 low-income advisory council (**LIAC**) in the development of the CEF Pilot proposal.

² *Ibid*, page 96.

³ *Ibid*, page 97.

⁴ Refer for example to pages 97 and 98 of the 2015 RDA Decision.

⁵ 2015 RDA Decision, page 96.

⁶ *Ibid*, page 97.

⁷ 2015 RDA Decision, Order G-5-17, Directive 15.

1 With respect to the pilot program filing, the Commission asked BC Hydro to provide
2 the following information:

- 3 • "The proposed start and end date of the pilot program, including a discussion of
4 operating the CIF pilot [CEF Pilot] until the next RDA hearing so that the
5 Commission and the parties can obtain a greater understanding of the impact of
6 a CIF [CEF]"⁸ (refer to section [1.3](#));
- 7 • "Development of cost/benefit measurement criteria to be able to assess the
8 impact of the proposed CIF [CEF] pilot or program"⁹ (refer to section [5](#)); and
- 9 • "Details regarding the implementation and operation of the CIF [CEF] pilot
10 program, including the amount of the monthly charge, who and how the CIF
11 [CEF] will be administered, and the eligibility criteria for ratepayers to access
12 the CIF [CEF]"¹⁰ (refer to sections [1.4](#), [2.1](#) and [4](#)).

13 Collectively the foregoing are referred to as the "Commission's CEF Requirements".
14 Each of the Commission's CEF Requirements is satisfied through the discussions in
15 this application, describing the CEF Pilot and the proposed Rate Schedule
16 **(RS)** 1903 – Customer Emergency Fund Rate Rider.

17 **1.3 CEF Pilot Objectives and Program Summary**

18 **1.3.1 Objectives and Considerations**

19 As mentioned above, BC Hydro is proposing the CEF Pilot following the
20 Commission's preliminary, non-binding indication that it would support a modest
21 residential monthly surcharge - a rate rider - to allow for the funding and assessment
22 of a pilot program to provide emergency assistance to residential customers in
23 temporary financial need. The CEF Pilot is proposed for such purpose and is
24 intended to allow BC Hydro to gather sufficient information to conduct an evaluation
25 at the end of the pilot and to inform whether the program should continue. The

⁸ 2015 RDA Decision, page 98.

⁹ *Ibid.*

¹⁰ *Ibid.*

1 evaluation, which is discussed further in section [6](#) below, will seek to identify the
2 actual impacts, costs and tangible benefits of the pilot.

3 In designing the CEF Pilot, BC Hydro reviewed various options, worked
4 collaboratively with the LIAC and other stakeholders (discussed further below in
5 section [1.7](#) below), and considered the following:

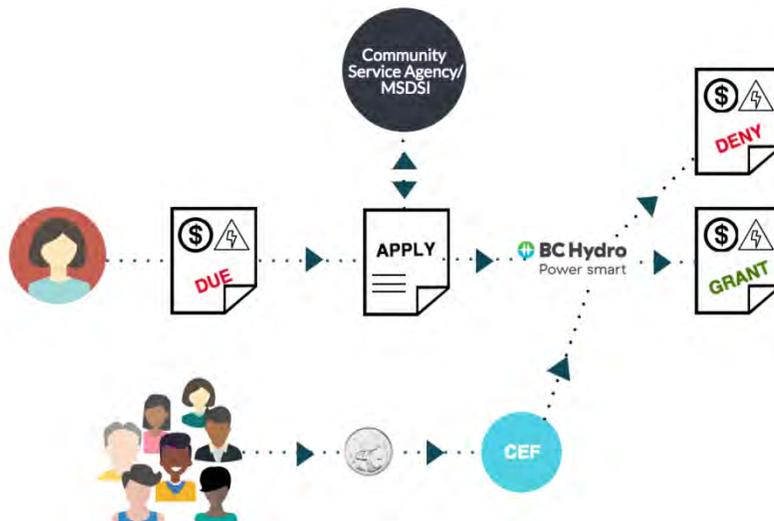
- 6 • That it be available to all BC Hydro residential customers in temporary financial
7 crisis;
- 8 • That it is easy to apply for;
- 9 • That it has the potential of reducing disconnections;
- 10 • That it has the potential to reduce bad debt and collection costs;
- 11 • That it has low administrative cost, thereby maximizing the amount available to
12 customers in need; and
- 13 • That it allows BC Hydro to gather sufficient data to evaluate whether the
14 CEF has some reasonable basis of benefiting residential customers as a whole.

15 Based on these considerations and the Commission's CEF Requirements, BC Hydro
16 will establish the CEF Pilot to run from June 1, 2018 to June 1, 2020, subject to the
17 specific approvals sought in this application.

1 **1.3.2 Program Overview**

2 [Figure 1](#) below presents an overview of the CEF Pilot design.

3 **Figure 1 Overview of the CEF Pilot Program Design**
4



5 The workings of the CEF Pilot are described below, and some of the elements will
6 be further discussed in other sections of this application:

- 7 1. BC Hydro residential account holders under RS 1101/1121, 1107/1127, 1148,
8 and 1151/1161 will contribute \$0.0082 per day through the CEF Rate Rider to
9 be established by RS 1903. GST will be applicable to the CEF Rate Rider.¹¹
10 The CEF Rate Rider of \$0.0082 per day is equivalent to 25 cents per month on
11 average.
- 12 2. Money collected from residential customers through the CEF Rate Rider will be
13 will be used solely to provide credits (which may also be referred to as “grants”
14 or “CEF grants” hereinafter) to the BC Hydro accounts of CEF Pilot participants
15 and to fund BC Hydro’s incremental costs associated with the CEF Pilot.

¹¹ This is different than the treatment of the Deferral Account Rate Rider (**DARR**), to which GST is not applicable.

-
- 1 3. Customers can submit an application to BC Hydro through bchydro.com or at
2 BC Hydro offices that provide in-person customer service,¹² Service BC offices,
3 and selected community service organizations that will be identified prior to the
4 CEF Pilot implementation. During the pilot period, the selected community
5 service organizations will also be available to help customers complete and
6 submit their application in situations when assistance is necessary (e.g.,
7 customers with poor English literacy).
- 8 4. To be eligible for a credit from the CEF (referred to as a CEF grant, or grant) a
9 BC Hydro residential customer must meet the program eligibility criteria.
10 Essentially, the grant will be provided to a residential customer whose
11 BC Hydro account is in arrears and who is facing a financial emergency, such
12 as an unexpected living expense, layoff, divorce, death, medical emergency or
13 condition, etc. The criteria are further discussed in section [1.4](#) below. The grant
14 is intended to assist these customers with life events that have caused
15 short-term financial hardship.
- 16 5. BC Hydro will evaluate each application in accordance with program criteria
17 and determine if a CEF grant should be approved.
- 18 6. If a CEF grant is approved, BC Hydro will apply a credit to the customer's
19 account in an amount equal to the customer's arrears, to a maximum of \$500 if
20 not residing in an electrically heated home or \$600 if residing in an electrically
21 heated home.
- 22 7. If a CEF grant is not approved, the customer may be able to request BC Hydro
23 reconsider its decision.
- 24 8. If the CEF grant is provided to a customer and it is later determined by
25 BC Hydro that it should not have been granted, BC Hydro will reverse the credit
26 and the customer will be required to return the funds.

¹² In-person service is currently offered in Vancouver (Dunsmuir Street), Burnaby (Southpoint Drive), Vernon and Prince George.

1.4 Eligibility Criteria

BC Hydro developed the eligibility criteria with significant input from the LIAC.

Once BC Hydro receives an application for the grant, BC Hydro will evaluate customers' eligibility in accordance with the criteria discussed below. The criteria can be grouped into three categories/sets. The first set of criteria focuses on ensuring that CEF funding is directed to customers who, with the grant, will be able to maintain or reconnect their energy service and remove the possibility of disconnection. Thus, to be eligible for a CEF grant, customers must meet all of the following criteria:

- Be the BC Hydro residential account holder, or authorized representative;
- Have a BC Hydro account in arrears and under the possibility of disconnection, or have been disconnected;
- Have an account balance of less than \$1,000;
- Account holder must reside at the address for which there are arrears;
- Have demonstrated prior attempt to pay the bill per their account records; and
- Have not have been issued a CEF grant within the past 12 months.

A demonstrated attempt to pay the bills previously and setting a maximum account balance were added as criteria following a visit to Ontario as part of our research (as mentioned in section [1.7](#) below). Those criteria are intended to discourage customers from allowing their arrears to increase in order to receive the maximum allowable grant. For example, if a customer has arrears in excess of \$1,000, they will be required to pay down the balance to \$1,000 or below before they would be eligible. BC Hydro notes that the average amount owing by residential customers at notification of final disconnection is approximately \$400 to \$500.

1 A second set of criteria has been established consistent with the idea that the
2 CEF Pilot could be akin to “insurance”¹³ for all customers should they find
3 themselves in a temporary financial crisis. This second set of criteria focusses on
4 customers who have recently experienced a “life event” within the previous
5 12 months that has caused short-term financial hardship. Life events include, but
6 may not be limited to:

- 7 • Layoff;
- 8 • Disability;
- 9 • Divorce;
- 10 • Death;
- 11 • Incarceration;
- 12 • Attendance at a drug/alcohol treatment program;
- 13 • Unexpected living expense; and
- 14 • Medical emergency.

15 The 12 month limitation for a “life event” is intended to be a guideline and not a firm
16 requirement. However, BC Hydro believes that the “insurance” aspect of the
17 program requires that the event causing financial hardship is somewhat recent. The
18 program is not intended to provide customers with assistance for long-term financial
19 issues, nor is it to be limited to low-income customers.

20 Customers participating in recognized assistance programs (e.g., Income
21 Assistance, Canada Pension Program – Guaranteed Income Supplement) will not
22 need to provide further proof of financial emergency beyond establishing their “life
23 event”. However, customers not in these assistance programs will be required to
24 provide additional financial information (e.g., bank statements) to demonstrate that

¹³ 2015 RDA Decision, at page 97.

1 they have exhausted all legal sources of funds (e.g., income, liquid assets, and other
2 financial assistance programs).

3 Finally, customers should also meet a number of administrative criteria, including
4 that they:

- 5 • Be willing and able to provide, upon request, documentation to support the
6 information they have provided in their application;
- 7 • Consent to having BC Hydro review their application for eligibility;
- 8 • Agree to BC Hydro's CEF Pilot Terms and Conditions for privacy, rights,
9 auditing, evaluation;
- 10 • Either agree to be referred to conservation program staff, or choose to opt out
11 of the conservation program; and
- 12 • Affirm that the information they have provided is complete and accurate.

13 Many of the criteria are similar to those of the Low-Income Energy Assistance
14 Program (**LEAP**) program in Ontario. However, the major difference between the
15 LEAP and the CEF Pilot is that the LEAP is only available to customers below
16 certain income levels.

17 BC Hydro will review customers' electricity account records to ensure that the
18 related criteria (e.g., having not received a grant in the prior 12 months) are met.
19 However, for the purpose of the assessing customer eligibility for the CEF Pilot,
20 customers' declarations of short term financial hardship will be accepted as
21 accurate. Verifying this information would be resource intensive and may create a
22 barrier to participation. BC Hydro plans to conduct a random audit of approximately
23 10 per cent of approved applications to determine if funds were provided as
24 intended. This rate of auditing will be evaluated and adjusted as appropriate during
25 the pilot period.

1 BC Hydro recognizes that the clarity of eligibility criteria will impact the number of
2 enquiries, applications received, processing time, and requests for BC Hydro to
3 reconsider decisions, all of which can contribute to an increase of program costs. As
4 a result, criteria will be subject to ongoing review during the pilot and will be a key
5 component of the pilot evaluation.

6 **1.5 Legal Considerations**

7 As noted above, the Commission concluded in the 2015 RDA Decision that it has no
8 jurisdiction to establish preferential rates for low-income customers or, more
9 generally, to establish social welfare programs. It nonetheless suggested on a
10 preliminary, non-binding basis, a modest residential monthly surcharge to fund a
11 pilot customer emergency fund.

12 BC Hydro understands that the establishment and operation of the CEF would be
13 like any other program or initiative that BC Hydro might undertake which is not a
14 "rate" within the meaning of that word in the *Utilities Commission Act (UCA)*, and for
15 which an approval order is not normally sought. By way of analogy, in revenue
16 requirements proceedings, utilities describe the activities that result in expenditures
17 which they seek to recover in rates approved by the Commission, but they do not
18 seek, and the Commission does give, binding orders approving the activities *per se*.

19 It is for this reason that BC Hydro does not seek an approval of its proposed
20 CEF Pilot. Rather, it seeks rate and accounting orders that will enable BC Hydro to
21 implement the CEF Pilot on the terms described in this application.

1.6 Orders Sought

As noted in the cover letter to this application, BC Hydro seeks approval of:

- RS 1903, and amendments to RS 1901, as described in section [7.1](#), effective June 1, 2018;
- Changes to BC Hydro's Electric Tariff (**CEF Tariff Changes**), as described in section [7.1.1](#), effective June 1, 2018; and
- The new Customer Emergency Fund Regulatory Account, as described in section [7.2](#), to be effective the date of the Commission's order.

A draft order is attached at Appendix A, and draft rate sheets are attached at Appendix B.

1.7 Research and Engagement

In designing the CEF Pilot, BC Hydro researched and considered the Ontario LEAP, which provides Emergency Financial Assistance (**EFA**) up to once a year, and the Manitoba Hydro Neighbours Helping Neighbours program, which provides one-time financial assistance to their customers in financial hardship. BC Hydro met with Ontario Energy Board staff, utilities, and delivery agencies. A summary of BC Hydro's review of these two programs can be found in Appendices C and D, respectively.

BC Hydro engaged other key stakeholders in the CEF Pilot development. More specifically, BC Hydro conducted interviews with a number of government agencies and community service organizations, an online survey, two focus groups, three workshops with the LIAC and considered relevant programs in British Columbia. Please refer to Appendices E, F, G and H for further information.

As mentioned above in the 2015 RDA Decision, the Commission indicated that it expected that BC Hydro would work collaboratively with the LIAC in the development

1 of a proposal. BC Hydro met with the LIAC three times during 2017 to discuss the
2 establishment of the CEF.

3 During these meetings, many aspects of the CEF Pilot were discussed, including the
4 term of the pilot, the use of third-party partners to assist customers (when needed) to
5 complete the application, and eligibility criteria. BC Hydro considered and adopted
6 some of the ideas discussed with the LIAC. While consensus was not reached on all
7 items of the proposal, BC Hydro understands that overall the LIAC supports
8 BC Hydro's proposed CEF Pilot.

9 **2 Program Design**

10 An overview of the CEF Pilot program was provided in section [1.3](#) above. The
11 following sections offer further details on the proposed CEF Rate Rider and other
12 key components of the pilot program.

13 **2.1 CEF Rate Rider**

14 The CEF Rate Rider would be established by RS 1903, a draft copy of which is
15 attached as Appendix B. The CEF Rate Rider would be identified on each residential
16 customer's invoice as the Customer Emergency Fund Rate Rider.

17 BC Hydro proposes that the CEF Rate Rider be set in the amount of \$0.0082 per
18 day, equivalent to 25 cents per month on average. During the 2015 RDA process,
19 BCOAPO proposed a \$0.25 per month charge per BC Hydro account.¹⁴ The
20 Commission subsequently determined that the charge should be limited to
21 residential customers.¹⁵ When applied to all residential accounts, this results in
22 annual CEF Rate Rider revenues of approximately \$5.3 million. Without a solid base
23 for forecasting participation, BC Hydro proposes the \$0.25 monthly charge (on
24 average) during the CEF Pilot. The revenue may be sufficient to enable grants for

¹⁴ 2015 RDA Decision, at page 93.

¹⁵ 2015 RDA Decision, at page 96.

1 approximately 10,250 participants based on an average grant of \$400 per customer,
2 as well as offset BC Hydro's set-up and annual operating costs for the CEF Pilot.

3 The average amount proposed to be collected from residential customers per month
4 of \$0.25 is a very small fraction of the typical average month BC Hydro bill which is
5 \$106.95. On average, \$0.25 represents approximately one quarter of 1 per cent of
6 an average bill, which is consistent with the directive of a modest residential monthly
7 surcharge.

8 [Table 1](#) below illustrates the components of the CEF Rate Rider. Values are
9 rounded, given the uncertainty associated with actual participation levels and grant
10 amounts.

11 The CEF Rate Rider was based on the following estimates:

- 12 • One-half of BC Hydro's estimated CEF Pilot set-up costs;¹⁶
- 13 • PLUS the estimated annual CEF Pilot operating costs;
- 14 • PLUS the estimated annual CEF grants issued to customers;
- 15 • DIVIDED BY the number of residential accounts that would be assessed the
16 CEF Rate Rider; and
- 17 • DIVIDED by 365 days.

18 Additionally section [5.1](#) below provides further information on the set-up costs,
19 annual operating costs, and other relevant information.

¹⁶ On the basis of a pilot program with a two-year duration.

1 **Table 1 CEF Rate Rider Components¹⁷**

A	One-half of Estimated CEF Pilot Set-Up Costs	300,000
B	Estimated Annual CEF Pilot Operating Costs	900,000
C	Estimated Annual CEF Grants	4,100,000
D = A+B+C	Subtotal Annualized Costs (\$)	5,300,000
E	Number of Residential Accounts	1,770,546
F = D/E	Annual Cost per Residential Account (\$)	3.00
G	Number of Days per Year	365
H = F/G	CEF Rate Rider (Daily Charge) (\$)	0.0082
I	Number of Months per Year	12
J = F/I	Average monthly CEF Rate Rider (\$)	0.25

2 BC Hydro does not currently have a suitable set of data to forecast and calculate the
 3 CEF Rate Rider (daily rate) due to the fact that the CEF Pilot is new and other
 4 jurisdictions' programs offer little comparative value. For instance, the program
 5 participation could vary from forecast, actual technology costs could vary from
 6 forecast, and the cost of setting up or sustaining the network of community agencies
 7 could also vary from forecast once a procurement process has been completed.
 8 BC Hydro reviewed the participation rates of the similar program in Ontario, as
 9 shown in Appendix C, but there are significant differences between the programs,
 10 most notably the income-based nature of Ontario's eligibility criteria. Thus, the
 11 information from which to base our participation forecasts is limited.

12 BC Hydro will monitor the financial position of the CEF Pilot and may need to adjust
 13 eligibility criteria should actual program participation result in the CEF Rate Rider
 14 significantly under or over-collecting customer contributions relative to the grants
 15 being issued. The proposed Customer Emergency Fund Regulatory Account will
 16 capture the net difference between CEF Rate Rider revenues and the incremental
 17 costs related to the CEF Pilot in each fiscal year, collectively referred to as "**Net**
 18 **CEF Costs**". This will ensure that residential ratepayers only pay the actual Net
 19 CEF Costs. The balance (if any) remaining in the Customer Emergency
 20 Fund Regulatory Account at the end of the CEF Pilot would be to the account of

¹⁷ Values may not sum due to rounding.

1 residential ratepayers and recovery or refund of the balance will be addressed after
2 completion of the CEF Pilot.

3 **2.2 Applicability**

4 As previously noted, the CEF Rate Rider would be applicable only to residential
5 accounts. The CEF Rate Rider, if approved, would thus be applied to all residential
6 accounts and in all rate zones, with the following two exceptions:

7 First, BC Hydro suggests that the proposed rate rider would not be applicable to
8 RS 1105 – Residential Service – Dual Fuel (Closed), also known as the E-Plus rate.
9 The E-Plus rate is to serve E-Plus customers' heating loads while customers'
10 non-heating loads are served under another residential service rate schedule.
11 BC Hydro proposes to assess the CEF Rate Rider just on the non-RS 1105 bills so
12 that E-Plus customers are not assessed the CEF Rate Rider twice.

13 Second, for Multiple Residential Service RS 1121, 1127, and 1161, there is only one
14 account with one meter, but with three or more dwellings behind the meter that are
15 each assessed the Basic Charge. BC Hydro proposes that the CEF Rate Rider be
16 charged only once, to the account holder, as only the account holder could access
17 the fund (in accordance with the eligibility requirements).

18 BC Hydro has determined that the CEF Rate Rider charge is subject to the federal
19 Goods and Services Tax ("taxes and levies", on RS 1903).

20 BC Hydro proposes that the DARR would not apply to the CEF Rate Rider charge
21 because, if the DARR did apply to the CEF Rate Rider charge, the result would be a
22 slight increase in revenue from residential customers attributable to the CEF Rate
23 Rider but allocated to all customer classes pursuant to section 10 of Direction No. 7.
24 A minor amendment to RS 1901 is proposed for this purpose.

1 **2.3 Financial Management**

2 Revenues collected by BC Hydro through the CEF Rate Rider will be tracked
3 separately such that they can be reported on as required. Once a customer's
4 application is approved, the applicable customer's account will be credited with an
5 amount equal to the customer's arrears, subject to the maximum amounts and
6 exclusions noted in section [2.4](#). The customer's next bill after the credit is applied
7 will reflect the amount of the CEF grant as a payment.

8 BC Hydro's processes will follow control procedures that will include segregation of
9 duties (e.g., approval of applications separate from applying the credit to the
10 customer account), reporting and auditing.

11 As discussed further in section [5.1](#) below, BC Hydro's incremental set-up and annual
12 operating costs will also be tracked separately. BC Hydro will create charge codes to
13 track and report these costs.

14 BC Hydro expects that demand for grants will vary throughout the year, consistent
15 with seasonal variations in bill amounts, while revenues will be largely unvarying.
16 BC Hydro will continue to incur expenses and offer grants even if the costs incurred
17 exceed the revenues collected, in anticipation that the total revenue collected
18 through the CEF Rate Rider may be sufficient to offset program costs and grants
19 over the duration of the CEF Pilot. However, as program participation and costs
20 could vary from forecast (as described in section [2.1](#)) and as there will be variations
21 in the timing of revenues and costs, it will likely result in Net CEF Costs that are not
22 zero in each fiscal year, which is the reason for the proposed Customer Emergency
23 Fund Regulatory Account, described further in section [7.2](#).

24 BC Hydro will track Customer Emergency Fund Regulatory Account balances during
25 the CEF Pilot period.

1 **2.4 CEF Grants**

2 Customers approved for a CEF grant will receive a credit to their account equal to
3 the customer's arrears, to the maximum amounts described below. The arrears may
4 include energy charges, CEF Rate Rider, Regional Transit Levy (RTL), GST on RTL,
5 as well as standard charges such as the late payment charge, account charge,
6 Meter Choices Program charges, returned payment charge and minimum
7 reconnection charge.

8 Charges proposed to be ineligible for the CEF grant are:

- 9 • Charges arising from construction and development (i.e., connection
10 charges),
- 11 • Charges arising from the a customer request to test the accuracy of a meter,
12 where the meter is found to be accurate (i.e., meter test charge),
- 13 • Charges arising from a customer not providing BC Hydro with necessary
14 access to their premise (i.e., failed installation charge and refused access
15 reconnection charge).

16 The listed charges are ineligible because the CEF grant is meant to support
17 customers in short-term financial hardship who have made efforts towards managing
18 and paying their BC Hydro bills. As part of the application process, the composition
19 of the charges on a customer account will be reviewed to identify such charges as
20 noted.

21 The maximum grant will be \$500 if the customer's premise is not electrically heated,
22 or \$600 if electricity is used to heat the home. Whether the premise is electrically
23 heated will be declared by customers in the application for funding and will be
24 subject to audit.

25 BC Hydro set the above limits by considering:

-
- 1 • The average amount owing to BC Hydro by a residential customer when they
2 receive their final notice of disconnection, which as noted in section [1.4](#) above
3 is \$400 to \$500, on average; and
- 4 • The CEF funding levels provided by Ontario's LEAP.

5 BC Hydro has confirmed that it is not necessary for customers to declare the
6 CEF grant as income or for BC Hydro to issue tax slips. BC Hydro has also
7 confirmed that receipt of the CEF grant will not disqualify a customer if applying for
8 assistance through B.C. Ministry of Social Development and Social Innovation
9 (MSDSI).

10 **2.5 Implementation Timeline**

11 Provided the Commission provides its approval of the CEF Rate Rider by the end of
12 December 2017, BC Hydro anticipates the program can be launched on
13 June 1, 2018. Key tasks required prior to the launch of the CEF Pilot include:

- 14 • Designing and implementing billing and financial system modifications;
- 15 • Developing a network of community service agencies and a service information
16 line;
- 17 • Recruiting program staff;
- 18 • Developing and delivering training programs;
- 19 • Finalizing communications plans and developing communications materials;
20 and
- 21 • Testing the application process prior to rolling it out across BC Hydro's service
22 territory.

23 BC Hydro notes the following two significant projects currently in progress that would
24 prohibit an earlier start than June 1, 2018 even if the Commission provided its
25 decision by December 2017:

-
- 1 • The Enterprise Billing Infrastructure Project, which is planned to launch in the
2 fourth quarter of fiscal 2018. This project is already using critical Technology
3 resources that will also be required to set-up the new CEF Pilot and make other
4 required changes to BC Hydro's billing system.
- 5 • BC Hydro's repatriation of Accenture functions, including the customer contact
6 centre and billing operations, which will occur on May 1, 2018. The focus at that
7 time will be on seamlessly transitioning operations between the two
8 organizations.

9 **3 Creating Customer Awareness of CEF Pilot**

10 Residential customers will be made aware of the CEF through BC Hydro's regular
11 communications channels, including:

- 12 • CEF Pilot messaging on relevant pages on BC Hydro's website, bchydro.com;
- 13 • Referrals during conversations about collection activities with Customer Service
14 Representatives during calls and in-person customer visits related to
15 installment plans and collections; and
- 16 • CEF Pilot messaging on customer invoices, as well as collections notifications
17 such as payment reminders and final notices of disconnection.

18 In particular, the use of collection notifications as a primary method of
19 communications was determined to be highly effective in Ontario's program.
20 Community service organizations and the LIAC have also indicated they see a
21 customer's potential loss of electrical service as being a trigger for the customer to
22 reach out to them for assistance.

23 The costs of adding CEF Pilot messaging to BC Hydro's website and collections
24 notifications are included in the Technology set-up costs identified in section [5.1](#).
25 BC Hydro is not proposing to charge the CEF for time spent by Customer Service
26 Representatives referring customers to the CEF Pilot at this time, as the referrals will

1 occur during normal business interactions and incremental call handling time is likely
2 small.

3 BC Hydro will also promote the CEF Pilot through community service organizations
4 that deal with individuals in hardship situations. Some, but not all, of these
5 organizations may also be used to provide customers with assistance in completing
6 their applications, as discussed in section [4.1](#).

7 Furthermore, government agencies such as the MSDSI will be provided information
8 so they can refer their clients to the CEF Pilot.

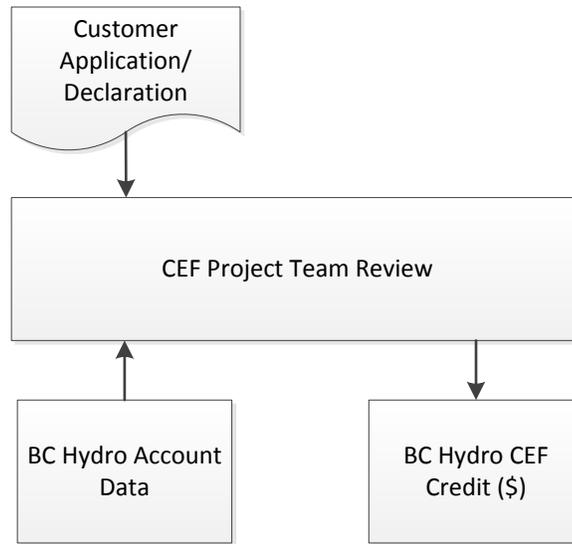
9 Creating awareness through government agencies and community service
10 organizations will require initial communications and site visits to facilitate an
11 understanding of the program and its eligibility requirements. BC Hydro will also
12 provide them these organizations with information materials (e.g., a pamphlet) that
13 they can use to direct potential applicants to the channels listed above. Production
14 costs will be minimized by distributing this electronically rather than on paper.

15 These costs are included in the set-up and operational costs as shown in
16 section [5.1](#).

4 Customer Application and Review Process

Figure 2 below illustrates at a high level how the application and review process would work.

Figure 2 High Level Delivery Approach



More specifically,

1. The customer will complete and submit an application form that includes the customer's account information, privacy consent and declaration of short-term financial hardship. As mentioned above, the application may be completed with the assistance of social or community agencies or organizations;
2. Once the application is submitted, BC Hydro will verify that the application is complete, that the applicant is the account holder or authorized representative, the account is in arrears, the amount owing is under \$1,000 and effort has been made by the customer to pay. If these criteria are met, BC Hydro will put a hold on any disconnection that is to occur while the application is being reviewed. Late payment charges would continue to apply;
3. BC Hydro will review the remaining eligibility criteria, and then inform the customer of the decision; and

-
- 1 4. If the application is approved, BC Hydro will apply a credit to the customer's
2 account in an amount equal to the customer's arrears, to a maximum of \$500 if
3 not residing in an electrically heated home or \$600 if residing in an electrically
4 heated home.

5 **4.1 Submission of Applications**

6 To apply for a CEF grant, an account holder must complete an application form and
7 submit it to BC Hydro at an office providing in-person customer service, by email or
8 through the online form.

9 The following will be available to assist customers in the application process:

- 10 • Calling BC Hydro's contact centre;
- 11 • Visiting a BC Hydro office that offers in-person service;
- 12 • Downloading an application form via www.bchydro.com;
- 13 • Calling a service information line;
- 14 • Connecting with their Band Social Worker if they are First Nation members
15 living on reserve;
- 16 • Connecting with a local community service agency; or
- 17 • Submitting a form to their local Service BC office.

18 In addition, for MSDSI clients who are accessing the existing MSDSI supplement,
19 BC Hydro and MSDSI will use existing communication channels and processes to
20 facilitate applications for clients referred by MSDSI.

21 The value of using local, community service agencies to help customers prepare and
22 complete applications was highlighted by BC Hydro's review of other jurisdictions'
23 programs and in consultation with the LIAC. Since BC Hydro doesn't offer in-person
24 services in all communities, partnering with community organizations throughout the
25 province will broaden the accessibility and increase customer awareness of the

1 program. In addition, because social service agents are trained and experienced in
2 helping people in crisis, they are better able to identify additional social services that
3 the customer may be able to access. Overall, this approach may help customers
4 address the underlying cause of their short-term financial hardship, and minimize the
5 number of repeat applicants to the CEF.

6 Estimated costs for involving local, community service agencies are included in
7 section [5.1](#) and are based on discussions with several community service
8 organizations and government agencies.

9 **4.2 Processing and Adjudication of Applications**

10 BC Hydro employees will process and adjudicate applications. BC Hydro plans to
11 create a dedicated team of employees for this purpose. The use of a dedicated team
12 will ensure that normal customer services are not disrupted by the introduction of the
13 CEF Pilot. It will also help to address privacy concerns by ensuring that an
14 applicant's personal information is available only to the minimum number of
15 employees necessary.

16 BC Hydro anticipates the following benefits as a result of delivering the program
17 internally:

- 18 • Processing and adjudicating applications by BC Hydro will allow greater
19 opportunity to gain first-hand knowledge about program challenges and
20 successes, and to quickly respond to unplanned issues that may arise during
21 the pilot, such as responding to findings of the above noted ongoing review of
22 pilot eligibility criteria;
- 23 • Processing and adjudicating applications internally minimizes the need for data
24 sharing between organizations, which may reduce operating, reporting and
25 evaluation costs; and

1 • Procurement, onboarding and contract management of a third-party program
2 delivery agency could add to the set-up costs and set-up time for pilot
3 implementation.

4 Having BC Hydro undertake application processing and adjudicating is different than
5 the Ontario model, which uses third-party agencies and was the basis for
6 BCOAPO's proposal during the 2015 RDA. A third-party model may be preferred for
7 the following reasons:

- 8 • A third-party doesn't have a vested interest in reduction of the utility's bad debts
9 and so may be less biased in approving grants;
- 10 • Service organizations that could serve as program adjudicators are more
11 closely integrated into communities and have a more comprehensive
12 understanding of the issues faced by those in hardship situations; and
- 13 • Some customers may distrust their utility, thereby creating a barrier to their
14 participation.

15 BC Hydro acknowledges these views, but has decided to adopt an internal delivery
16 model given the benefits it provides. If the CEF were expanded to include other
17 utilities in the province, BC Hydro expects there may be additional benefits to a
18 third-party delivery model.

19 **4.3 Applicant Request for BC Hydro Reconsideration Process**

20 BC Hydro expects that some customers who are denied a CEF grant will disagree
21 with the decision and request that BC Hydro reconsider their application. BC Hydro
22 will establish a reconsideration process similar to existing customer service
23 procedures in which the dispute will be referred to a second department for an
24 independent review of the application to determine if the situation was correctly
25 assessed relative to the criteria. BC Hydro will monitor the reconsideration process
26 during the pilot period as a source of information when evaluating if program
27 adjustments should be made.

1 Customers may file complaints or escalate their case after the denial and
2 BC Hydro's reconsideration, using the channels available for other customer service
3 issues. These channels could include submitting complaints to the Commission and
4 the Office of the Ombudsperson. BC Hydro will share an analysis of the trends of
5 escalations/requests for reconsiderations with regards to CEF with the LIAC to
6 provide the context for making changes to the CEF Pilot.

7 **4.4 Privacy**

8 To assess a customer's eligibility, BC Hydro will need to collect, use and store
9 applicant personal information (e.g., details of their crisis situation and information
10 about assets and liabilities) with which BC Hydro does not currently deal. For
11 prudence sake, BC Hydro is consulting with the Office of the Information and Privacy
12 Commissioner for BC (**OIPC**) to seek their input on how to best address the
13 associated privacy risks.

14 Subject to the input of the OIPC, and in accordance with the requirements of the
15 *Freedom of Information and Protection of Privacy Act*, the application process will
16 provide applicants with appropriate privacy notifications and seek written consent
17 where necessary. BC Hydro will implement appropriate collection, use and storage
18 measures and security controls with respect to the collected personal information –
19 including restrictions on access to the stored personal information. CEF funding
20 decisions (i.e., the date and pending/rejected/accepted status only) will be flagged
21 on the CCS Customer Care & Service account record, so that Contact Centre staff
22 members will be able to assist applicants effectively should questions arise by phone
23 or email.

5 Costs and Benefits

In this section, BC Hydro will first describe the projected set-up and annual operational costs of the CEF Pilot, followed by a discussion of the potential benefits of the program.

5.1 Projected Set-Up Costs and Annual Operational Costs

All costs presented in this section are incremental costs for the set-up and operation of the CEF Pilot. As noted in [Table 2](#) below, set-up costs are estimated to be approximately \$600,000.

Table 2 Estimated CEF Pilot Set-Up Costs

Program Management (\$)	150,000
IT Systems (\$)	400,000
Travel, for Training (\$)	20,000
Communications and Reference Materials (\$)	30,000
Total Set-Up Costs (\$)	600,000

The most significant set-up cost is related to IT Systems upgrades/adjustments, which are necessary to make financial system changes to create the CEF Rate Rider, enable credits to be applied to eligible customer accounts if a CEF grant is approved, add CEF Pilot messaging to bchydro.com and collections notifications, and provide basic reporting.

As shown in [Table 3](#), annual operating costs are estimated to be \$900,000, or approximately 17 per cent of the amount collected through the CEF Rate Rider, which is approximately \$5.3 million.

1
2

Table 3 Estimated Annual CEF Pilot Operating Costs

BC Hydro (\$)	
Program Management	200,000
Administration and Adjudication	450,000
IT Systems (fixed)	50,000
Training	10,000
Program Evaluation	30,000
Community Service Organizations Application Support (\$)	160,000
Total (\$)	900,000

3 Costs associated with administration and adjudication will be dependent on
4 participation rates as well as application processing time. This will be closely
5 monitored throughout the pilot and adjusted where feasible.

6 The participation rate in the CEF Pilot is hard to estimate. BC Hydro used 10,000
7 CEF grants out of 15,000 applications as a basis for calculating the costs for
8 administration and adjudication based on the assumption that roughly one in
9 ten customers with arrears will apply.

10 To administer and adjudicate applications, it is estimated that between five and eight
11 new full time equivalent BC Hydro employees will be required. Design of the
12 CEF Pilot has been based on minimizing the use of technology to only those
13 elements necessary to create the CEF Rate Rider and enable credits to be applied
14 to customer accounts. This approach has been taken to reduce the upfront cost and
15 time necessary to launch the CEF Pilot. Over time it is possible that IT
16 improvements could be used to reduce manual processing, and BC Hydro will
17 consider these opportunities in the program evaluation.

18 BC Hydro will also incur additional incremental costs to provide customers with
19 phone or in-person assistance to complete applications (i.e., beyond CEF Pilot
20 referrals noted in section [3](#)). These costs are included in the administration and
21 adjudication costs.

1 Community service organizations may receive compensation for program referrals
2 and for assisting customers to complete application forms. This cost has been
3 estimated at \$160,000 annually based on the expected time required to support
4 applicants and the anticipated participation levels.

5 **5.2 Potential Financial Benefits of the CEF Pilot**

6 BC Hydro has almost 1.8 million residential accounts. Based on data for
7 December 2016, at any one time about 7 per cent of residential accounts are in
8 arrears 30 days or greater. Accounts that remain in arrears proceed through
9 BC Hydro's collection process¹⁸ and may ultimately be disconnected if payment is
10 not received. BC Hydro's ratepayers bear the costs of the collection process and of
11 bad debt due to uncollectible revenues.

12 BC Hydro incurs incremental costs during the collection process to notify customers
13 of overdue bills, to create payment arrangements, and to disconnect and reconnect
14 service. In addition, if customers terminate their accounts without paying their bills in
15 full, BC Hydro is then left with uncollectible revenue that must be expensed as bad
16 debt. Potential benefits of a CEF program that could result in reduced residential
17 electricity rates are those associated with increased electricity revenue, reduced
18 operating costs and reduced interest costs. These benefits will be assessed through
19 the CEF Pilot. An associated, offsetting effect would be a reduction in electricity
20 revenue due to reduction in late payment charges. These effects are summarized
21 below.

22 BC Hydro notes that some of its collection costs are already offset by the Late
23 Payment Charge and the Minimum Reconnection Charge. Therefore, while some
24 customers receiving CEF grants would themselves benefit by avoiding these costs,
25 the reduction of collection activities will not necessarily result in net financial benefits
26 to BC Hydro.

¹⁸ The collection process is also referred to as the "dunning" process.

1
2

Table 4 Potential Effects of the CEF Pilot on BC Hydro Revenue Requirements

Changes to Electricity Revenue	<ul style="list-style-type: none"> Increased revenue by avoiding losses in consumption resulting from disconnection. Reduction in Late Payment Charge revenues as a result of more timely payment of arrears.
Changes to Operating Costs	<ul style="list-style-type: none"> Reduction in costs of collections notifications. Reduction in contact centre costs because of fewer collection calls. Reduction in credit costs because of fewer accounts in arrears. Reduction in bad debt costs.
Changes to Interest Charges	<ul style="list-style-type: none"> Reduced interest costs because of more timely payments.

3 **5.3 Benefit Cost Ratio**

4 BC Hydro considered two options for assessing the benefits and cost of the
5 CEF Pilot. These are presented below.

6 **Table 5 Benefit Cost Ratios**

Options	A	B
Benefits	<ul style="list-style-type: none"> Increased electricity revenue. Reduced operating costs. Reduced interest charges. Other benefits identified through the pilot. 	<ul style="list-style-type: none"> Same as A.
Costs	<ul style="list-style-type: none"> Reduced late payment charge revenues. CEF Pilot set-up costs. CEF Pilot annual operating costs. CEF grants. 	<ul style="list-style-type: none"> Reduced late payment charge revenues. CEF Pilot set-up costs. CEF Pilot annual operating costs.
Considerations	<ul style="list-style-type: none"> Benefits are defined as those that can practically be verified, and that could ultimately reduce future revenue requirements and rates. Residential ratepayer perspective. BC Hydro's preferred option. 	<ul style="list-style-type: none"> Benefits are defined as those that can practically be verified, and that could ultimately reduce future revenue requirements and rates. Costs exclude the total value of grants on the basis that they are a transfer between customers, not a cost to BC Hydro of running the pilot. Does not fully reflect the costs to residential customers who pay the CEF rate rider.

7 BC Hydro proposes to assess the benefits and cost of the pilot using Option A,
8 above. This approach will capture both the direct financial benefits, in terms of

1 potential reduced revenue requirements, and the costs, in terms of the CEF Rate
2 Rider charge, incurred by residential ratepayers.

3 **6 Reporting and Evaluation**

4 BC Hydro proposes to evaluate the CEF Pilot, and will provide the evaluation report
5 to the Commission. This evaluation is expected to be undertaken near the end of the
6 two year pilot period, and to include:

- 7 1. Estimates of the costs and benefits of the CEF pilot;
- 8 2. Comparison of CEF pilot participants to the population of all BC Hydro
9 customers on the basis of region, housing type and other available parameters;
- 10 3. Participation, grant levels and Customer Emergency Fund Regulatory Account
11 balances over time; and
- 12 4. Effectiveness of program design and delivery, including eligibility criteria.

13 This is consistent with the 2015 RDA Decision, in which the Commission concludes
14 that, to the extent that the benefits exceed the costs of such a program, a crisis
15 intervention program may be justified.¹⁹

16 ... if the cost savings resulting from the CIF do not fully offset
17 the costs and a ratepayer's ability to access the CIF is limited to
18 a small segment of residential customers who find themselves in
19 a financial crisis facing disconnection, the Panel must decide if
20 this results in undue discrimination.²⁰

21 In addition, BC Hydro will develop and report on CEF Pilot performance metrics,
22 which may include the following items:

- 23 • Disconnects (overall and number avoided);
- 24 • Reconnects (overall and number avoided);
- 25 • Participant experience (gathered through the use of a survey);

¹⁹ 2015 RDA Decision, pages 96 to 97.

²⁰ 2015 RDA Decision, page 97.

-
- 1 • Non-participant experience monitored through existing escalation (complaint
 - 2 tracking);
 - 3 • Customer Satisfaction (CSAT) (%);
 - 4 • Customer Emergency Fund Regulatory Account balance (\$);
 - 5 • Applicants (number);
 - 6 • CEF grant recipients (number);
 - 7 • Total grants issued (\$);
 - 8 • CEF grant amounts (\$);
 - 9 • Repeat grants issued (number, \$);
 - 10 • Average application handle time (minutes);
 - 11 • Case documentation including any discretion applied (trends);
 - 12 • Audit results; and
 - 13 • Pilot participant payment performance following participation.

14 **7 Orders Sought**

15 **7.1 RS 1901 AND RS 1903**

16 RS 1903 would, if approved, apply the CEF Rate Rider (\$0.0082/day) to residential
17 customer bills.

18 The amendments to RS 1901 would ensure that the DARR is not applicable to the
19 CEF Rate Rider charge.

20 Proposed RS 1903 and proposed amendments to RS 1901 are included in
21 Appendix B.

1 7.1.1 CEF Tariff Changes

2 As noted above in section [1.5](#), BC Hydro understands that the establishment and
3 operation of the Customer Emergency Fund would not be a “rate” within the
4 meaning of the word in the UCA, or a “service”. In consequence, credits issued by
5 BC Hydro to qualifying customers, or reversals of credits previously provided,
6 returns to BC Hydro of grants erroneously issued to non-qualifying customers, would
7 not in the normal course appear on customers’ bills.²¹ However, to reduce the costs
8 of the CEF Pilot, and make it more likely to generate a net benefit for
9 non-participating customers, BC Hydro believes it is necessary to treat both credits,
10 and the reversal of credits, as if they were in regard to “rates”, thereby allowing
11 BC Hydro to apply credits directly against arrears showing on bills; to reverse credits
12 previously applied against arrears on bills; and to avail itself of tariff remedies in the
13 case of reversed credits. These objectives require a few additions to BC Hydro’s
14 Terms and Conditions in its Electric Tariff, as follows:

15 A new paragraph at the end of section 2.1:

16 "Customer Emergency Fund Grants and Customer Emergency
17 Fund Returns are deemed to be, for the purposes of section 2.4
18 (Refusal to Provide Service and Termination by BC Hydro) and
19 section 5.2.1(5) (Regular Billing) of the Electric Tariff, amounts
20 owing to Customers and amounts owing to BC Hydro,
21 respectively, in respect of Service provided by BC Hydro to
22 Customers pursuant to Service Agreements."

23 A new sentence in section 5.2.1:

24 "5. Where a Customer Emergency Fund Grant has been issued,
25 or a Customer Emergency Fund Return has been requested, by
26 BC Hydro."

²¹ Section 63 of the UCA states that "A public utility must not, without the consent of the commission, directly or indirectly, in any way charge, demand, collect or receive from any person for a regulated service provided by it, or to be provided by it, compensation that is greater than, less than or other than that specified in the subsisting schedules of the utility applicable to that service and filed under this Act." This is why, for example, amounts owed to customers in their capacity as vendors to BC Hydro do not appear on BC Hydro's electricity service bills, and why amounts owed by BC Hydro to customers pursuant to Demand-Side Management programs similarly do not appear on such bills.

1 Three new definitions:

2 Customer Emergency Fund: A pilot program established by
3 BC Hydro with the revenue received pursuant to Rate
4 Schedule 1903, for the purpose of providing emergency grants
5 to qualifying Residential Service Customers.

6 Customer Emergency Fund Grant: A credit issued by BC Hydro,
7 in its discretion, to a qualifying Residential Service Customer in
8 respect of arrears owing to BC Hydro.

9 Customer Emergency Fund Return: The return of a Customer
10 Emergency Fund Grant that BC Hydro determined should not
11 have been granted.

12 Draft rate sheets showing these proposed changes are included in Appendix B.

13 **7.2 Customer Emergency Fund Regulatory Account**

14 BC Hydro seeks approval to establish the Customer Emergency Fund Regulatory
15 Account. BC Hydro believes that residential ratepayers should only pay the actual
16 net costs of the CEF Pilot (i.e., CEF Rate Rider revenues collected from residential
17 customers less CEF grants less BC Hydro's incremental costs related to the CEF
18 Pilot). As noted in sections [2.1](#) and [5.1](#), BC Hydro does not have a solid base for
19 forecasting the participation rate for the CEF Pilot, which drives the related costs.
20 Accordingly, costs are expected to vary from forecast. There will also be variations in
21 the timing of revenues and costs as described in section [2.3](#), which will likely result
22 in Net CEF Costs that are not zero in each fiscal year. Further, BC Hydro expects to
23 incur set-up costs prior to the launch of the CEF Pilot on June 1, 2018 as described
24 in sections [2.5](#) and [5.1](#). The Customer Emergency Fund Regulatory Account
25 ensures that residential ratepayers only pay the actual net costs incurred for the
26 CEF Pilot.

27 BC Hydro proposes that the net difference between the CEF Rate Rider revenues
28 and the incremental costs related to the CEF Pilot in each fiscal year (Net CEF
29 Costs) be transferred to the Customer Emergency Fund Regulatory Account.

1 The Net CEF Costs in each fiscal year will be determined by subtracting the
2 incremental costs of the CEF Pilot from the CEF Rate Rider revenues in each fiscal
3 year. The incremental costs would be the sum of actual CEF grants, actual set-up
4 costs, and actual annual operating costs, as described in section [5.1](#). The costs and
5 revenues related to the CEF Pilot have not been included in BC Hydro's
6 Fiscal 2017 – Fiscal 2019 Revenue Requirements Application.

7 Any remaining balance in the Customer Emergency Fund Regulatory Account at the
8 end of the CEF Pilot would be to the account of residential ratepayers to ensure that
9 residential ratepayers only pay the actual net costs for the CEF Pilot. The method to
10 recover or refund any remaining balance in the Customer Emergency Fund
11 Regulatory Account will be addressed after completion of the CEF Pilot.

12 BC Hydro proposes that interest would not be applied to the Customer Emergency
13 Fund Regulatory Account given the two-year duration of the CEF Pilot.

14 In the event that the Customer Emergency Fund Regulatory Account is not
15 approved, BC Hydro would manage the CEF Pilot such that the costs of the CEF
16 Pilot do not exceed the CEF Rate Rider revenues in each fiscal year to ensure that
17 residential ratepayers only pay the actual Net CEF Costs. This may necessitate
18 capping the number of grants if the CEF Rate Rider revenues are insufficient to
19 cover the costs of the CEF Pilot for each fiscal year. This would lead to sub-optimal
20 results in the efficiency of the CEF Pilot as well as for the program participants.

21 **8 Proposed Regulatory Process**

22 This Application is not seeking to, and does not present a vehicle to, establish and
23 review a social assistance program, (which would be beyond the Commission's
24 jurisdiction).²² As mentioned above, BC Hydro brought this application based on the
25 Commission's preliminary, non-binding support of a rate-rider applicable to all
26 residential customers to fund a customer emergency fund. Thus, the scope of the

²² 2015 RDA Decision, at page 96.

1 Application is limited to approving the CEF Rate Rider, necessary tariff changes to
2 facilitate the CEF Pilot, and the Customer Emergency Fund Regulatory Account.

3 Due to the limited scope of this application and the fact that the low-income rate
4 proposals have already been extensively addressed in the 2015 RDA, BC Hydro
5 proposes a streamlined review process (**SRP**) for the Application, with one round of
6 information requests preceding the SRP.

7 BCOAPO has indicated to BC Hydro that it supports a SRP. The proposed timetable
8 is provided in [Table 6](#) below

9 **Table 6 Proposed Regulatory Review Process for**
10 **CEF Application**

Process	Date
Filing of Application	July 24, 2017
Commission Issues Regulatory Timetable	August 4, 2017
Round 1 Commission Information Requests	August 14, 2017
Round 1 Intervener Information Requests	August 21, 2017
BC Hydro Responses to Round 1 Information Requests	September 18, 2017
Streamlined Review Process	October 16, 2017

11 **9 Communications**

12 All communications regarding this proceeding are to be addressed to:

Fred James
Chief Regulatory Officer

BC Hydro
1600-333 Dunsmuir Street
Vancouver, BC V6B 5R3

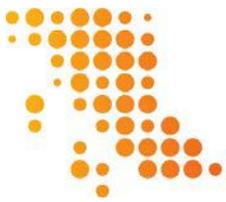
Telephone: 604-623-4046
Fax: 604-623-4407

Email:
bhydroregulatorygroup@bhydro.com

Customer Emergency Fund Application

Appendix A

Draft Order



ORDER NUMBER

G-xx-xx

IN THE MATTER OF

the *Utilities Commission Act*, RSBC 1996, Chapter 473

and

British Columbia Hydro and Power Authority (BC Hydro)

An Application for Orders pursuant to Sections 58 to 61 of the *Utilities Commission Act*

BEFORE:

Commissioner
Commissioner
Commissioner

on Date

ORDER

WHEREAS:

- A. On September 24, 2015, the British Columbia Hydro and Power Authority (BC Hydro) filed with the British Columbia Utilities Commission (Commission), pursuant to sections 58 to 61 of the *Utilities Commission Act*, the 2015 Rate Design Application (2015 RDA);
- B. In the course of the public hearing of the 2015 RDA, it was proposed that BC Hydro establish a "crisis intervention fund" to be made available to BC Hydro customers in arrears and facing the possibility of disconnection;
- C. Following the public hearing of the 2015 RDA, the Commission issued Order No. G-5-17 and accompanying reasons for decision on January 20, 2017 (2015 RDA Reasons);
- D. In Order No. G-5-17, and in the 2015 RDA Reasons, the Commission concluded that a crisis intervention fund could potentially be grounded on an economic or cost-of-service basis, and directed BC Hydro to file a proposal for a pilot program within six months of the date of the order;
- E. On July 24, 2017 BC Hydro filed an application pursuant to sections 58 to 61 and 49(a) of the *Utilities Commission Act* regarding a proposed Customer Emergency Fund Pilot Program (CEF Pilot), and seeking Commission orders:
 - a. approving Rate Schedule 1903, which would establish a Customer Emergency Fund Rate Rider (CEF Rate Rider), effective June 1, 2018;
 - b. approving an amendment to Rate Schedule 1901, to exclude the application of the Deferral Account Rate Rider to the CEF Rate Rider, effective June 1, 2018;

- c. approving certain amendments to BC Hydro's Electric Tariff related to the CEF Pilot (CEF Tariff Changes), effective June 1, 2018; and
- d. establishing the CEF Regulatory Account, effective the date of the Commission's Order.

F. [DESCRIPTION OF PROCESS]

G. The Commission has reviewed the Application and related information and submissions.

NOW THEREFORE pursuant to sections 58 to 61 and 49(a) of the *Utilities Commission Act*, the Commission orders as follows:

1. Rate Schedule 1903 is approved, as applied for, effective June 1, 2018.
2. Amended Rate Schedule 1901 is approved, as applied for, effective June 1, 2018.
3. The CEF Tariff Changes are approved, as applied for, effective June 1, 2018.
4. The CEF Regulatory Account is approved, as applied for, effective the date of this Order.
5. BC Hydro shall file with the Commission amended tariff sheets reflecting the approval of Rate Schedule 1903, the amended Rate Schedule 1901, and the CEF Tariff Changes at least 30 days prior to their effective date.

DATED at the City of Vancouver, in the Province of British Columbia, this (XX) day of (Month Year).

BY ORDER

(X. X. last name)
Commissioner

Attachment Options

Customer Emergency Fund Application

Appendix B

Rate Sheets

Black-lined and Clean

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1. INTERPRETATION AND DEFINITIONS

1.1 Interpretation

1.1.1 Conflicts

To the extent these Terms and Conditions conflict with any applicable Rate Schedule or Electric Tariff Supplement, the terms or conditions provided in such Rate Schedule or Electric Tariff Supplement will prevail. To the extent that an applicable Rate Schedule conflicts with an applicable Electric Tariff Supplement, the terms or conditions provided in the Electric Tariff Supplement will prevail.

1.1.2 Statutes

References to statutes in the Electric Tariff will include the statute and regulations issued pursuant to it, as amended and in force from time to time, and any superseding statute or regulation.

1.1.3 Technical Terms

Technical or industry-specific phrases, units of measure or words not otherwise defined in the Electric Tariff have the well-known meaning given to those terms in the electrical industry.

1.1.4 Including

In the Electric Tariff, the word “including” will in all cases be deemed to mean “including without limitation”, unless otherwise expressly provided.

1.2 Definitions

Unless the context otherwise requires, in the Electric Tariff the following words have the meanings set out below and alternate forms of the same words have corresponding meanings.

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BC Hydro	British Columbia Hydro and Power Authority.
BC Hydro- Owned Street Lighting Service	Service for lighting of public highways, streets, lanes and other similar public applications and displays, or for lighting of private property, where BC Hydro owns, installs and maintains the fixtures, conductors, controls and poles.
Billing Demand	Maximum Demand or, where permitted by the applicable Rate Schedule, estimated Demand, used to determine Demand charges under a Rate Schedule.
Customer	Any Person whose application for Service has been accepted by BC Hydro or, in the absence of such an application, the Person with possession of the Premises to which Service is provided or the Owner or such other Person designated as the Customer pursuant to the Electric Tariff. If a Customer receives Service at more than one Premises, such Customer will be considered a separate Customer for each Premises. BC Hydro will determine the number of Premises for the purpose of this definition.
<u>Customer Emergency Fund</u>	<u>A pilot program established by BC Hydro with the revenue received pursuant to Rate Schedule 1903, for the purpose of providing emergency grants to qualifying Residential Service Customers.</u>
<u>Customer Emergency Fund Grant</u>	<u>A credit issued by, in its discretion, to a qualifying Residential Service Customer in respect of arrears owing to BC Hydro.</u>
<u>Customer Emergency Fund Return</u>	<u>The return of a Customer Emergency Fund Grant that BC Hydro determined should not have been granted.</u>
Customer- Owned Street Lighting Service	Service for lighting of public highways, streets, lanes, traffic signals, traffic signs and other similar public applications and displays where the Customer owns, installs and maintains the fixtures, conductors and controls.

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Demand	The rate at which electric energy is used in any instant or averaged over any designated period of time, measured in kilowatts (kW) or kilovolt amperes (kVA).
Disconnection	A physical deactivation of a Service Connection, including through removal of Metering Equipment and / or other BC Hydro equipment used to provide Service, regardless of duration.
Dwelling	A building or part of a building comprising private living quarters and containing sleeping quarters, a kitchen and bathroom, and in which the occupants have free access to all rooms, or alternative living quarters acceptable to BC Hydro, and including single-family homes, apartments, townhouses, row-houses and duplexes.
Electric Tariff	These Terms and Conditions, the Rate Schedules and all Electric Tariff Supplements.
Electric Tariff Supplement	A form of agreement for Service entered into by a Customer and BC Hydro pursuant to section 2.2 (Electric Tariff Supplements) of these Terms and Conditions, as filed with the British Columbia Utilities Commission from time to time.
Electricity	Both Demand and Energy or either, as the context requires.
Energy	Electric consumption, measured in kilowatt hours (kWh).
Estimated Construction Cost	The cost estimated by BC Hydro to construct an Extension, a Service Connection or Optional Facilities pursuant to section 8.3 (Extension Fee for Rate Zone I), as the context requires.
Extension	An addition to or an increase in the capacity of BC Hydro's distribution system required to meet new or increased Service requirements, but excluding Service Connections.
Extension Fee	A contribution-in-aid of construction of an Extension, calculated as set out in section 8.3 (Extension Fee for Rate Zone I).
Financing Agreement	An agreement under which BC Hydro provides financing to a Customer for improving the energy efficiency of a Premises.

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General Service	<p>Service for business, commercial, institutional or industrial use, including use in nursing homes, boarding houses, rooming houses, common areas of multiple occupancy buildings, recreational establishments, marinas and yacht clubs, hotels, motels, mobile home parks and similar establishments or parts thereof, or for any other use not specifically provided for in the Electric Tariff.</p> <p>For greater certainty, General Service is not available for use in circumstances where Transmission Service or Street Lighting Service is available for use, and is available as an alternative to Residential Service only in the circumstances described in section 6.1.3 (General Service Election – Residential Customers) and as an alternative to Irrigation Service only in the circumstances described in section 6.1.4 (General Service Election – Irrigation Customers).</p>
Guarantor	<p>A BC Hydro Customer who agrees to be responsible for another Customer’s security deposit amount as required by section 2.6.3 (Security) and who meets BC Hydro’s requirements for acting as a Guarantor.</p>
Irrigation Service	<p>Except where General Service is requested pursuant to section 6.1.4 (General Service Election – Irrigation Customers), Service for irrigation and outdoor sprinkling use where associated motor loads are 746 watts (W) or more.</p>
Legacy Meter	<p>An Electricity meter, other than a Smart Meter or a Radio-off Meter, that is of a type in use by BC Hydro.</p>
Maximum Demand	<p>The highest Demand averaged over a time interval of not more than 32 consecutive minutes that is registered during a specified period by a meter with Demand measurement capability.</p>
Metering Equipment	<p>An assembly of metering and ancillary equipment, including one or more Legacy Meters, Radio-off Meters and / or Smart Meters, auxiliary control units, cabling, communication links, range extenders and any other devices owned and used by BC Hydro in connection with metering Electricity for a Premises, providing remote access to the metered data and / or monitoring the condition of the installed equipment, as applicable.</p>

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Month	A period of from 27 to 33 consecutive days.
Owner	The legal or beneficial owner(s) of a building or Premises or an agent or other authorized representative of such owner(s), such as a property manager, strata corporation or developer, as the context requires.
Permanent Service	Service that is not Temporary Service.
Person	A natural person, partnership, corporation, society, unincorporated entity or body politic.
Point of Delivery	The location at which the Service Connection is connected to the Metering Equipment or the Customer's electrical facilities, whichever comes first.
Power Factor	The ratio determined by the following formula and based on monthly measurements of kilowatt hours (kWh) and lagging kilovolt-ampere reactive hours (kVarh) or at BC Hydro's discretion by random checks from time to time. $\text{Power Factor} = \frac{kWh}{\sqrt{kWh^2 + kVarh^2}}$
Premises	A building, a separate unit of a building, a Dwelling or machinery, together with the surrounding land.
Primary Voltage	A voltage of 750 volts (V) or more measured phase to phase.
Radio-off Meter	A Smart Meter adjusted so that the meter's components that transmit and receive data by radio are deactivated.
Rate Schedule	A schedule that sets out rates for Service and other terms and conditions, as filed with the British Columbia Utilities Commission from time to time.
Rate Zone I	All distribution areas served by BC Hydro within the limits from time to time outlined in Rate Map A included in these Terms and Conditions, as well as the Districts of Kingsgate-Yahk and Lardeau-Shutty Bench.
Rate Zone IB	Bella Bella.

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Rate Zone II	Anahim Lake, Atlin, Bella Coola, Dease Lake, Elhlateese, Fort Ware, Good Hope Lake, Haida Gwaii, Hartley Bay, Jade City, Telegraph Creek District, Toad River and Tsay Keh Dene.
Residential Service	Except as otherwise provided in section 6.1.3 (General Service Election – Residential Customers), Service for use: <ol style="list-style-type: none"> 1. In Dwellings, including Dwellings where a portion is used to carry on a business; 2. In the common areas of multiple occupancy buildings if such common areas are used only for the common benefit of Dwellings in that building; and 3. At farms, in the circumstances described in section 6.1.2 (Eligibility of Farms for Residential Service).
Secondary Voltage	A voltage of less than 750 volts (V) measured phase to phase.
Service	The provision by BC Hydro of Electricity to a Premises.
Service Agreement	The agreement setting out the rights and responsibilities of BC Hydro and a Customer for Service, including the application for Service accepted by BC Hydro (if any), all applicable provisions of the Terms and Conditions and applicable Rate Schedule(s), and any additional terms and conditions of Service as agreed by BC Hydro and the Customer in an Electric Tariff Supplement or otherwise.
Service Connection	That part of the BC Hydro distribution system extending between a Point of Delivery and the first point of attachment to the rest of the BC Hydro distribution system.
Smart Meter	An Electricity meter that: <ol style="list-style-type: none"> 1. Meets the requirements set out in section 2 of the <i>Smart Meters and Smart Grid Regulation</i>, B.C. Reg. 368/2010, and 2. Has components that transmit data by radio and those components are activated.

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Street Lighting Service	BC Hydro-Owned Street Lighting Service or Customer-Owned Street Lighting Service or both, as the context requires.
System Improvement Costs	The incremental cost of work on BC Hydro’s distribution system, including substations, attributed to new or increased Service requirements, as estimated by BC Hydro.
Temporary Service	Service that will or, in BC Hydro’s determination, is likely to be taken temporarily.
Termination	Cessation of Service to a Premises under any applicable Rate Schedule(s) or termination of the Service Agreement with a Customer, as the context requires.
Terms and Conditions	These terms and conditions of Service, as filed with the British Columbia Utilities Commission from time to time.
Transformation	The transformation of Primary Voltage to Secondary Voltage, including all associated labour, equipment and materials.
Transmission Service	Service for commercial, industrial and institutional Customers, provided at 60 kilovolts (kV) or more.
Two Months	A period of from 54 to 66 consecutive days.

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1.3 Map of Rate Zones

Rate map
RATE ZONE LIMITS

ZONE I	ZONE IB	ZONE II
— Integrated Service Area Districts of: ● Fort Nelson ● Eddontenajon ● Kingsgate – Yahk ● Lardeau – Shutty Bench	District of: ▲ Bella Bella	Districts of: ●●●● Haida Gwaii ■ Anahim Lake ■ Atlin ■ Bella Coola ■ Dease Lake ■ Eihlateese ■ Fort Ware ■ Good Hope Lake ■ Hartley Bay ■ Jade City ■ Telegraph Creek ■ Toad River ■ Tsay Keh Dene



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COMMISSION SECRETARY

2. APPLICATION FOR SERVICE AND SERVICE AGREEMENT

2.1 Application for Service and Service Agreement

A Person requesting new or modified Service must apply to BC Hydro online at www.bchydro.com, by telephone, or in person. Applicants may be required to complete and sign an application and agreement for Service in the form provided by BC Hydro and to provide information and identification acceptable to BC Hydro.

BC Hydro may refuse to accept an application for Service for any of the reasons listed in section 2.4 (BC Hydro Refusal to Provide Service and Termination).

The Service Agreement between a Customer and BC Hydro will comprise, to the extent applicable, the application for Service, as accepted by BC Hydro, the provisions of the Terms and Conditions and Rate Schedules, and any additional terms and conditions of Service agreed by BC Hydro and the Customer in an Electric Tariff Supplement or otherwise.

Customer Emergency Fund Grants and Customer Emergency Fund Returns are deemed to be, for the purpose of section 2.4 (Refusal to Provide Service and Termination by BC Hydro) and section 5.2.1(5) (Regular Billing) of the Electric Tariff, amounts owing to Customers and amounts owing to BC Hydro, respectively, in respect of Service provided by BC Hydro to Customers pursuant to Service Agreements.

2.2 Electric Tariff Supplements

BC Hydro may provide Service under an Electric Tariff Supplement, subject to filing it with the British Columbia Utilities Commission.

2.3 Commencement and Term of Service

Except as otherwise provided in the Service Agreement, a Person becomes a Customer and Service commences when:

1. BC Hydro connects or re-connects the Premises to BC Hydro’s electrical system; or
2. The Person’s right to possession of the Premises commences,

whichever is later and regardless of whether such Person has completed and signed an application or any contract for Service, and Service will continue until Terminated by BC Hydro or the Customer.

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2.4 Refusal to Provide Service and Termination by BC Hydro

BC Hydro may, without liability of any kind, refuse to provide Service to any Person or may without notice Terminate Service to any Customer (whether by Disconnection or otherwise) who:

1. Fails to pay for Service;
2. Fails to pay an amount due as a result of that Customer acting as a Guarantor for another BC Hydro Customer under section 2.6.3 (Security);
3. Fails to apply for Service or fails to provide information or identification acceptable to BC Hydro when applying for Service or at any subsequent time on request by BC Hydro;
4. Occupies the Premises with another occupant who has an amount outstanding under a Service Agreement or Financing Agreement in respect of the current Premises or another Premises previously occupied by the Person or Customer and such other occupant at the same time;
5. Fails to provide access as required by section 9.3 (Access to Premises);
6. Fails to pay any amount owing under a Financing Agreement; or
7. Otherwise fails to comply with the Service Agreement.

2.5 No Assignment

A Customer may not assign a Service Agreement to another Person.

2.6 Security for Payment of Bills

2.6.1 Security for Payment of Bills

An applicant for Service who has not established credit satisfactory to BC Hydro will be required to:

1. Provide security in accordance with section 2.6.3 (Security), or
2. Participate in Pay As You Go Billing as set out in section 2.6.2 (Pay As You Go Billing), with no security.

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A Customer who has not maintained credit satisfactory to BC Hydro will be required to provide security or to increase the amount of existing security in accordance with section 2.6.3 (Security).

2.6.2 Pay As You Go Billing

Customers participating in Pay As You Go Billing will be billed by BC Hydro at the beginning of each month based either on an estimated average monthly bill or one-twelfth of the estimated annual bill for Service, subject to amendment by BC Hydro from time to time. Pay As You Go bills have the same force and effect as bills based on actual meter readings and must be paid in accordance with section 5.3 (Payment of Bills).

Any Customer participating in Pay As You Go Billing who has paid in full all amounts when due during the immediately preceding year may terminate Pay As You Go Billing and elect any other billing option then available to that Customer under the Service Agreement.

2.6.3 Security

The amount of security required will in each case be determined by BC Hydro in its discretion based on factors such as Energy consumption at the Premises and Customer account and credit history, provided that the security required by BC Hydro will not in any case exceed:

1. If the account is billed monthly, two times the average monthly bill of the Customer or, in the case of an applicant, two times the estimated average monthly bill;
2. If the account is billed bi-monthly, three times the average monthly bill of the Customer or, in the case of an applicant, three times the estimated average monthly bill; or

This security obligation may be satisfied by providing to BC Hydro a security deposit or, for a Customer taking Residential Service, a guarantee from a Guarantor. A security deposit must be in the form of cash or an equivalent form of security acceptable to BC Hydro and a guarantee must be in a form acceptable to BC Hydro.

2.6.4 Application and Return of Security

1. A security deposit may be returned to the Customer, or in the case of a guarantee provided by a Guarantor cancelled, at any time if, according to the records of BC Hydro, the Customer has at all times during the immediately preceding one year period maintained an account with BC Hydro and paid in full all amounts when due in accordance with the Service Agreement.

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2. BC Hydro may apply the whole or any part of the Customer's security deposit and earned interest, if any, toward payment of any amount not paid by the Customer to BC Hydro on the due date shown on the bill. No application of the security deposit under this section will restrict BC Hydro's right to Terminate Service for the Customer's failure to pay for Service. The Customer will promptly replenish the security deposit upon request by BC Hydro.
3. A cash security deposit and interest, if any, may be applied by BC Hydro in whole or in part toward payment of the final bill of the Customer on the billing date of the final bill.
4. A security deposit in a form other than cash may be applied by BC Hydro in whole or in part toward payment of the final bill of the Customer if all amounts owing are not paid on the due date shown on the bill.
5. If a Customer's account is closed and a guarantee has been provided, BC Hydro may transfer to the Guarantor's account any outstanding balance, up to the maximum amounts specified in section 2.6.3 (Security), within one year of the date on which the account was closed.
6. Any part of a security deposit, including interest, if any, on a cash security deposit, that has not been applied in accordance with this section will be refunded or returned to the Customer.
7. BC Hydro will pay interest on cash security deposits at a rate equal to BC Hydro's weighted average cost of debt, calculated for BC Hydro's most recent fiscal year.
8. Payment of interest on a cash security deposit held by BC Hydro will be made in the form of a credit to the Customer's account each time the account is billed or added to the amount of the cash deposit when a refund is made as provided in paragraph 5 above.
9. BC Hydro will not pay interest on security deposits held by it in a form other than cash.
10. No interest will accrue on any security deposit after the billing date of the final bill for the account secured by the deposit.

2.7 Termination of Service by Customer

Except as otherwise provided in the Service Agreement, a Customer may Terminate Service by giving to BC Hydro at least 24 hours' notice. The Customer continues to be subject to all

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applicable terms and conditions of the Service Agreement, including the obligation to pay for all Electricity provided to the Premises and all damage to and loss of wires, Metering Equipment or other apparatus of BC Hydro until the Termination date specified in the notice or 24 hours after BC Hydro receives such notice, whichever is later.

In cases where the Customer is a tenant and fails to provide notice of Termination in accordance with this section, the Owner will, pursuant to section 2.3 (Commencement and Term of Service) but subject to the terms of any rental premises agreement in effect pursuant to section 9.2 (Rental Premises Agreements), become the new Customer for the Premises on the day that its right to possession of the Premises commences and therefore assume responsibility for payment of Electricity used on the Premises from that date.

2.8 No Release of Customer Obligations

No Termination of Service will release a Customer from any previously existing obligations to BC Hydro under a Service Agreement or Financing Agreement or any other agreement with BC Hydro.

2.9 Customer Request for Disconnection

Upon receipt of a Customer request, BC Hydro will Disconnect the Customer’s Premises. The Customer will be responsible to pay for all Electricity used at the Premises until Disconnection in accordance with this section, unless Service is earlier Terminated by either the Customer or BC Hydro.

2.10 Re-Application for Service

Where a Customer Terminates Service to a Premises and that Person, or a co-occupant, representative or agent of that Person, applies for Service to the same Premises within 12 months of such Termination on the same Rate Schedule as previously applied, and regardless of whether Disconnection occurred, the applicant will pay the sum of:

1. The greater of the Minimum Reconnection Charge, as set out in section 11.3 (Minimum Reconnection Charges), or BC Hydro’s estimated cost to restore Service; and
2. The sum of the minimum charges the Customer would have paid between the time of Termination and the time that Service is restored, under this section.

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5. METER READING AND BILLING

5.1 Meter Reading

The interval between consecutive meter readings will be at the sole discretion of BC Hydro.

Where the Rate Schedule under which the Customer takes Service does not require measurement of the Customer’s Demand, the meter will normally be read once every two months; otherwise meters will normally be read once per month.

5.2 Billing

5.2.1 Regular Billing

Bills will be rendered on the basis of actual Energy consumed and, where applicable, Demand, as registered by a meter or meters and in accordance with the Rate Schedule under which the Customer takes Service, except:

1. Where the Service is not metered;
2. To the extent that section 6.3 (Late Payment Charge) applies;
3. Where the bill is being rendered in accordance with section 2.6.2 (Pay As You Go Billing), or section 5.6 (Monthly Equal Payments); or
4. Where section 5.2.2 (Change in Rate Schedule) applies.
5. Where a Customer Emergency Fund Grant has been issued, or a Customer Emergency Fund Return has been requested, by BC Hydro.

If meter readings cannot be obtained for any reason, including where the meter fails to register or registers incorrectly, the Demand or Energy consumption or both may be estimated by BC Hydro for billing purposes and the next bill for which actual meter readings are available will be adjusted for the difference between estimated and actual use over the interval between meter readings. Estimated bills are deemed to have the same force and effect under the Electric Tariff as bills that are based on actual meter readings.

If meters are read at longer or shorter intervals than the period set out in the Rate Schedule under which the Customer takes Service, the minimum charge, the service charge, the

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number of kilowatt hours in each step and, if applicable, the Demand charge set out in such Rate Schedule will be prorated before the bill is calculated based on a 365-day year.

5.2.2 Change in Rate Schedule

In circumstances where a Rate Schedule is changed and the effective date of the change falls between the dates of two successive meter readings, BC Hydro will render a bill determined upon a prorated basis.

5.3 Payment of Bills

Bills will be rendered as often as deemed necessary by BC Hydro. The amount payable as shown on a bill is owed to BC Hydro on the billing date. To avoid a Late Payment Charge under section 6.3 (Late Payment Charge), the amount payable must be paid in full on or before the due date shown on the bill, which will be:

1. The first business day after the 21st calendar day following the billing date; or
2. Such other period as may be defined in an Electric Tariff Supplement or otherwise agreed by the Customer and BC Hydro.

Bills may be paid by any payment method set out at www.bchydro.com/payments. Information on bill payment options can also be obtained by contacting the customer service department of BC Hydro.

5.4 Billing of Fractional Demand

A Billing Demand that includes a fraction will be deemed to be the nearest whole unit of Demand below that fraction.

The minimum Billing Demand will, except where the context otherwise requires, be deemed to be 1 kW or 1 kVA, whichever is applicable.

5.5 Waiver of Minimum Charges

Where the Owner of a motel or mobile home park is the Residential Service Customer for any separately metered unit of accommodation in the motel or mobile home park, whether pursuant to BC Hydro requirements or otherwise, and if no Electricity is consumed in such unit during an interval between meter readings, the minimum charge otherwise applicable to such interval will be waived.

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In multi-unit residential buildings where separate meters for the units are installed during construction of the building, minimum charges will apply only after Service to the relevant unit is energized.

5.6 Monthly Equal Payments

On application by a Customer, BC Hydro will, provided the Customer's credit is established to the satisfaction of BC Hydro, permit the Customer to pay fixed monthly installments on account of Electricity consumed by the Customer during all or any part of a 12-month period commencing with an actual meter reading at the Customer's Premises (the Budget Period). Monthly installments will be fixed so that the sum of the installments to be paid during the Budget Period equals the amount BC Hydro estimates will be payable under the applicable Rate Schedule for Electricity consumed during the Budget Period. BC Hydro may at any time revise its estimate of a Customer's consumption and increase or decrease the amount of monthly installments payable by the Customer accordingly.

Payment of monthly installments pursuant to this section may be terminated by the Customer at any time by giving five days' notice of termination to BC Hydro, or by BC Hydro without notice if the Customer has not maintained credit to the satisfaction of BC Hydro.

At the end of each Budget Period or upon its earlier termination the amount payable by the Customer to BC Hydro for Electricity actually used during the Budget Period will be compared against the sum of the monthly installments paid by the Customer during that period, and any deficit will be paid by the Customer to BC Hydro, and any excess will be paid or credited by BC Hydro to the Customer on the next bill.

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5.7 Back-Billing

Pursuant to the *Utilities Commission Act*, this Electric Tariff constitutes the consent of the British Columbia Utilities Commission to allow BC Hydro, in the circumstances herein specified, to charge, demand, collect and receive from its Customers in respect of a regulated service rendered a greater or lesser compensation than that specified in the Terms and Conditions or applicable Rate Schedules.

1. Back-billing means the re-billing by BC Hydro for services rendered to a Customer because the original billings were discovered to be either too high (over-billed) or too low (under-billed). The discovery may be made by either the Customer or BC Hydro, including as a result of an inspection under the *Electricity and Gas Inspection Act (Canada)*. The cause of the billing error may include any one or more of the following non-exhaustive reasons:
 - (a) Stopped meter
 - (b) Metering Equipment failure
 - (c) Missing meter now found
 - (d) Switched meters
 - (e) Double metering
 - (f) Incorrect meter connections
 - (g) Incorrect use of any prescribed apparatus respecting the registration of a meter
 - (h) Incorrect meter multiplier
 - (i) Application of an incorrect rate
 - (j) Incorrect reading of meters or data processing, and
 - (k) Tampering, fraud, theft or any other criminal act.

2. Whenever the dispute procedure of the *Electricity and Gas Inspection Act (Canada)* is invoked, the provisions of that Act will apply, except insofar as they purport to determine the nature or extent of legal liability flowing from metering or billing errors.

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3. Where metering or billing errors occur and the dispute procedure under the *Electricity and Gas Inspection Act (Canada)* is not invoked, Energy consumption and Demand for billing purposes will be determined based on the records of BC Hydro or, to the extent they are available and accurate, the records of the Customer, or if no such records are available, based on BC Hydro’s reasonable and fair estimates made consistently within each Customer class or according to the agreement for Service with the Customer, if applicable.
4. In every case of under-billing or over-billing, the cause of the error will be remedied without delay, and the Customer will be promptly notified of the error and of the effect upon the Customer's ongoing bill.
5. The provisions of paragraph 7 below do not apply and, subject to the applicable limitation period provided by law, back-billing may be applied for the whole period of under-billing or over-billing if:
 - (a) There are reasonable grounds to believe that the Customer has tampered with or otherwise used BC Hydro's Service in an unauthorized way, or evidence of fraud, theft or another criminal act exists, or if a reasonable Customer should have known of an under-billing and failed to promptly bring it to the attention of BC Hydro; or
 - (b) The required adjustment to the Customer’s bill is minor, such as in the case of an estimated bill under section 5.2.1 (Regular Billing) or section 5.6 (Monthly Equal Payments); or
 - (c) The required adjustment to the Customer’s bill relates to the under-billing or over-billing of a standard charge set out in section 11 (Schedule Standard Charges), except Legacy Meter Charges and Radio-off Meter Charges under section 11.4 (Miscellaneous Standard Charges).

In addition, the Customer is liable for the direct (unburdened) administrative costs incurred by BC Hydro in the investigation of any incident of tampering, unauthorized use or criminal activity, including the direct costs of repair and replacement of equipment.

Under-billing resulting from circumstances described in this paragraph 5 will bear interest at the rate normally charged by BC Hydro on unpaid accounts from the date of the original under-billed invoice until the amount under-billed is paid in full.

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- 6. In every case of over-billing, BC Hydro will refund to the Customer all money incorrectly collected for the duration of the error, except that if the date the error first occurred cannot be determined with reasonable certainty, the maximum refund period will be two years back from the date the error was discovered. Interest will be paid to the Customer at a rate equal to BC Hydro’s weighted average cost of debt, calculated for BC Hydro’s most recent fiscal year.
- 7. Subject to paragraph 5 above, in every case of under-billing, BC Hydro will back-bill the Customer for the duration of the error up to a maximum of:
 - (a) Six months for Residential Service, small General Service (commercial) or Irrigation Service Customers; and
 - (b) One year for all other Customers or such other time period as is set out in a special or individually negotiated contract with BC Hydro.

BC Hydro will offer under-billed Customers reasonable terms of payment for the under-billed amount; if requested by the Customer, the payment term will be equivalent in length to the back-billing period. All under-billed amounts will be interest free and be billed and paid in equal installments corresponding to the normal billing cycle. Delinquency in payment of such installments will, however, be subject to the usual Late Payment Charges pursuant to section 6.3 (Late Payment Charge).

If a Customer disputes BC Hydro’s assessment of an under-billed amount based on Energy consumption or Demand or duration of the error, BC Hydro will not threaten or cause Termination as a result of Customer’s failure to pay the disputed portion of the back-billing, unless there are no reasonable grounds for the Customer to dispute same. The undisputed portion of the bill will be paid by the Customer and BC Hydro may threaten or cause Termination if such undisputed portion of the bill is not paid.

- 8. Subject to paragraph 5 above, in all instances of back-billing where changes of occupancy have occurred, BC Hydro will make a reasonable attempt to locate the former Customer. If, after a period of one year, such Customer cannot be located, the over- or under-billing applicable to that Customer will be cancelled.

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6. OTHER

RATE SCHEDULE 1901 – DEFERRAL ACCOUNT RATE RIDER

Applicability	The Deferral Account Rate Rider as set out below applies to all charges payable under other Rate Schedules of the Electric Tariff except for <u>Rate Schedule 1903 and Electric Tariff Supplement Nos. 7, 8, 39 and 77.</u>
Deferral Account Rate Rider	A charge equal to 5% of all amounts otherwise payable under the applicable Rate Schedule, before taxes and levies.

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1. INTERPRETATION AND DEFINITIONS

1.1 Interpretation

1.1.1 Conflicts

To the extent these Terms and Conditions conflict with any applicable Rate Schedule or Electric Tariff Supplement, the terms or conditions provided in such Rate Schedule or Electric Tariff Supplement will prevail. To the extent that an applicable Rate Schedule conflicts with an applicable Electric Tariff Supplement, the terms or conditions provided in the Electric Tariff Supplement will prevail.

1.1.2 Statutes

References to statutes in the Electric Tariff will include the statute and regulations issued pursuant to it, as amended and in force from time to time, and any superseding statute or regulation.

1.1.3 Technical Terms

Technical or industry-specific phrases, units of measure or words not otherwise defined in the Electric Tariff have the well-known meaning given to those terms in the electrical industry.

1.1.4 Including

In the Electric Tariff, the word “including” will in all cases be deemed to mean “including without limitation”, unless otherwise expressly provided.

1.2 Definitions

Unless the context otherwise requires, in the Electric Tariff the following words have the meanings set out below and alternate forms of the same words have corresponding meanings.

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BC Hydro	British Columbia Hydro and Power Authority.
BC Hydro-Owned Street Lighting Service	Service for lighting of public highways, streets, lanes and other similar public applications and displays, or for lighting of private property, where BC Hydro owns, installs and maintains the fixtures, conductors, controls and poles.
Billing Demand	Maximum Demand or, where permitted by the applicable Rate Schedule, estimated Demand, used to determine Demand charges under a Rate Schedule.
Customer	Any Person whose application for Service has been accepted by BC Hydro or, in the absence of such an application, the Person with possession of the Premises to which Service is provided or the Owner or such other Person designated as the Customer pursuant to the Electric Tariff. If a Customer receives Service at more than one Premises, such Customer will be considered a separate Customer for each Premises. BC Hydro will determine the number of Premises for the purpose of this definition.
Customer Emergency Fund	A pilot program established by BC Hydro with the revenue received pursuant to Rate Schedule 1903, for the purpose of providing emergency grants to qualifying Residential Service Customers.
Customer Emergency Fund Grant	A credit issued by, in its discretion, to a qualifying Residential Service Customer in respect of arrears owing to BC Hydro.
Customer Emergency Fund Return	The return of a Customer Emergency Fund Grant that BC Hydro determined should not have been granted.
Customer-Owned Street Lighting Service	Service for lighting of public highways, streets, lanes, traffic signals, traffic signs and other similar public applications and displays where the Customer owns, installs and maintains the fixtures, conductors and controls.

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Demand	The rate at which electric energy is used in any instant or averaged over any designated period of time, measured in kilowatts (kW) or kilovolt amperes (kVA).
Disconnection	A physical deactivation of a Service Connection, including through removal of Metering Equipment and / or other BC Hydro equipment used to provide Service, regardless of duration.
Dwelling	A building or part of a building comprising private living quarters and containing sleeping quarters, a kitchen and bathroom, and in which the occupants have free access to all rooms, or alternative living quarters acceptable to BC Hydro, and including single-family homes, apartments, townhouses, row-houses and duplexes.
Electric Tariff	These Terms and Conditions, the Rate Schedules and all Electric Tariff Supplements.
Electric Tariff Supplement	A form of agreement for Service entered into by a Customer and BC Hydro pursuant to section 2.2 (Electric Tariff Supplements) of these Terms and Conditions, as filed with the British Columbia Utilities Commission from time to time.
Electricity	Both Demand and Energy or either, as the context requires.
Energy	Electric consumption, measured in kilowatt hours (kWh).
Estimated Construction Cost	The cost estimated by BC Hydro to construct an Extension, a Service Connection or Optional Facilities pursuant to section 8.3 (Extension Fee for Rate Zone I), as the context requires.
Extension	An addition to or an increase in the capacity of BC Hydro's distribution system required to meet new or increased Service requirements, but excluding Service Connections.
Extension Fee	A contribution-in-aid of construction of an Extension, calculated as set out in section 8.3 (Extension Fee for Rate Zone I).
Financing Agreement	An agreement under which BC Hydro provides financing to a Customer for improving the energy efficiency of a Premises.

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<p>General Service</p>	<p>Service for business, commercial, institutional or industrial use, including use in nursing homes, boarding houses, rooming houses, common areas of multiple occupancy buildings, recreational establishments, marinas and yacht clubs, hotels, motels, mobile home parks and similar establishments or parts thereof, or for any other use not specifically provided for in the Electric Tariff.</p> <p>For greater certainty, General Service is not available for use in circumstances where Transmission Service or Street Lighting Service is available for use, and is available as an alternative to Residential Service only in the circumstances described in section 6.1.3 (General Service Election – Residential Customers) and as an alternative to Irrigation Service only in the circumstances described in section 6.1.4 (General Service Election – Irrigation Customers).</p>
<p>Guarantor</p>	<p>A BC Hydro Customer who agrees to be responsible for another Customer’s security deposit amount as required by section 2.6.3 (Security) and who meets BC Hydro’s requirements for acting as a Guarantor.</p>
<p>Irrigation Service</p>	<p>Except where General Service is requested pursuant to section 6.1.4 (General Service Election – Irrigation Customers), Service for irrigation and outdoor sprinkling use where associated motor loads are 746 watts (W) or more.</p>
<p>Legacy Meter</p>	<p>An Electricity meter, other than a Smart Meter or a Radio-off Meter, that is of a type in use by BC Hydro.</p>
<p>Maximum Demand</p>	<p>The highest Demand averaged over a time interval of not more than 32 consecutive minutes that is registered during a specified period by a meter with Demand measurement capability.</p>
<p>Metering Equipment</p>	<p>An assembly of metering and ancillary equipment, including one or more Legacy Meters, Radio-off Meters and / or Smart Meters, auxiliary control units, cabling, communication links, range extenders and any other devices owned and used by BC Hydro in connection with metering Electricity for a Premises, providing remote access to the metered data and / or monitoring the condition of the installed equipment, as applicable.</p>

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Month	A period of from 27 to 33 consecutive days.
Owner	The legal or beneficial owner(s) of a building or Premises or an agent or other authorized representative of such owner(s), such as a property manager, strata corporation or developer, as the context requires.
Permanent Service	Service that is not Temporary Service.
Person	A natural person, partnership, corporation, society, unincorporated entity or body politic.
Point of Delivery	The location at which the Service Connection is connected to the Metering Equipment or the Customer's electrical facilities, whichever comes first.
Power Factor	The ratio determined by the following formula and based on monthly measurements of kilowatt hours (kWh) and lagging kilovolt-ampere reactive hours (kVarh) or at BC Hydro's discretion by random checks from time to time. $\text{Power Factor} = \frac{kWh}{\sqrt{kWh^2 + kVarh^2}}$
Premises	A building, a separate unit of a building, a Dwelling or machinery, together with the surrounding land.
Primary Voltage	A voltage of 750 volts (V) or more measured phase to phase.
Radio-off Meter	A Smart Meter adjusted so that the meter's components that transmit and receive data by radio are deactivated.
Rate Schedule	A schedule that sets out rates for Service and other terms and conditions, as filed with the British Columbia Utilities Commission from time to time.
Rate Zone I	All distribution areas served by BC Hydro within the limits from time to time outlined in Rate Map A included in these Terms and Conditions, as well as the Districts of Kingsgate-Yahk and Lardeau-Shutty Bench.
Rate Zone IB	Bella Bella.

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Rate Zone II	Anahim Lake, Atlin, Bella Coola, Dease Lake, Elhlateese, Fort Ware, Good Hope Lake, Haida Gwaii, Hartley Bay, Jade City, Telegraph Creek District, Toad River and Tsay Keh Dene.
Residential Service	<p>Except as otherwise provided in section 6.1.3 (General Service Election – Residential Customers), Service for use:</p> <ol style="list-style-type: none"> 1. In Dwellings, including Dwellings where a portion is used to carry on a business; 2. In the common areas of multiple occupancy buildings if such common areas are used only for the common benefit of Dwellings in that building; and 3. At farms, in the circumstances described in section 6.1.2 (Eligibility of Farms for Residential Service).
Secondary Voltage	A voltage of less than 750 volts (V) measured phase to phase.
Service	The provision by BC Hydro of Electricity to a Premises.
Service Agreement	The agreement setting out the rights and responsibilities of BC Hydro and a Customer for Service, including the application for Service accepted by BC Hydro (if any), all applicable provisions of the Terms and Conditions and applicable Rate Schedule(s), and any additional terms and conditions of Service as agreed by BC Hydro and the Customer in an Electric Tariff Supplement or otherwise.
Service Connection	That part of the BC Hydro distribution system extending between a Point of Delivery and the first point of attachment to the rest of the BC Hydro distribution system.
Smart Meter	<p>An Electricity meter that:</p> <ol style="list-style-type: none"> 1. Meets the requirements set out in section 2 of the <i>Smart Meters and Smart Grid Regulation</i>, B.C. Reg. 368/2010, and 2. Has components that transmit data by radio and those components are activated.

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Street Lighting Service	BC Hydro-Owned Street Lighting Service or Customer-Owned Street Lighting Service or both, as the context requires.
System Improvement Costs	The incremental cost of work on BC Hydro’s distribution system, including substations, attributed to new or increased Service requirements, as estimated by BC Hydro.
Temporary Service	Service that will or, in BC Hydro’s determination, is likely to be taken temporarily.
Termination	Cessation of Service to a Premises under any applicable Rate Schedule(s) or termination of the Service Agreement with a Customer, as the context requires.
Terms and Conditions	These terms and conditions of Service, as filed with the British Columbia Utilities Commission from time to time.
Transformation	The transformation of Primary Voltage to Secondary Voltage, including all associated labour, equipment and materials.
Transmission Service	Service for commercial, industrial and institutional Customers, provided at 60 kilovolts (kV) or more.
Two Months	A period of from 54 to 66 consecutive days.

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1.3 Map of Rate Zones

Rate map
RATE ZONE LIMITS

ZONE I	ZONE IB	ZONE II
— Integrated Service Area Districts of: ● Fort Nelson ● Eddontenajon ● Kingsgate – Yahk ● Lardeau – Shutty Bench	District of: ▲ Bella Bella	Districts of: ●●●● Haida Gwaii ■ Anahim Lake ■ Atlin ■ Bella Coola ■ Dease Lake ■ Eihlateese ■ Fort Ware ■ Good Hope Lake ■ Hartley Bay ■ Jade City ■ Telegraph Creek ■ Toad River ■ Tsay Keh Dene



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2. APPLICATION FOR SERVICE AND SERVICE AGREEMENT

2.1 Application for Service and Service Agreement

A Person requesting new or modified Service must apply to BC Hydro online at www.bchydro.com, by telephone, or in person. Applicants may be required to complete and sign an application and agreement for Service in the form provided by BC Hydro and to provide information and identification acceptable to BC Hydro.

BC Hydro may refuse to accept an application for Service for any of the reasons listed in section 2.4 (BC Hydro Refusal to Provide Service and Termination).

The Service Agreement between a Customer and BC Hydro will comprise, to the extent applicable, the application for Service, as accepted by BC Hydro, the provisions of the Terms and Conditions and Rate Schedules, and any additional terms and conditions of Service agreed by BC Hydro and the Customer in an Electric Tariff Supplement or otherwise.

Customer Emergency Fund Grants and Customer Emergency Fund Returns are deemed to be, for the purpose of section 2.4 (Refusal to Provide Service and Termination by BC Hydro) and section 5.2.1(5) (Regular Billing) of the Electric Tariff, amounts owing to Customers and amounts owing to BC Hydro, respectively, in respect of Service provided by BC Hydro to Customers pursuant to Service Agreements.

2.2 Electric Tariff Supplements

BC Hydro may provide Service under an Electric Tariff Supplement, subject to filing it with the British Columbia Utilities Commission.

2.3 Commencement and Term of Service

Except as otherwise provided in the Service Agreement, a Person becomes a Customer and Service commences when:

1. BC Hydro connects or re-connects the Premises to BC Hydro’s electrical system; or
2. The Person’s right to possession of the Premises commences,

whichever is later and regardless of whether such Person has completed and signed an application or any contract for Service, and Service will continue until Terminated by BC Hydro or the Customer.

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2.4 Refusal to Provide Service and Termination by BC Hydro

BC Hydro may, without liability of any kind, refuse to provide Service to any Person or may without notice Terminate Service to any Customer (whether by Disconnection or otherwise) who:

1. Fails to pay for Service;
2. Fails to pay an amount due as a result of that Customer acting as a Guarantor for another BC Hydro Customer under section 2.6.3 (Security);
3. Fails to apply for Service or fails to provide information or identification acceptable to BC Hydro when applying for Service or at any subsequent time on request by BC Hydro;
4. Occupies the Premises with another occupant who has an amount outstanding under a Service Agreement or Financing Agreement in respect of the current Premises or another Premises previously occupied by the Person or Customer and such other occupant at the same time;
5. Fails to provide access as required by section 9.3 (Access to Premises);
6. Fails to pay any amount owing under a Financing Agreement; or
7. Otherwise fails to comply with the Service Agreement.

2.5 No Assignment

A Customer may not assign a Service Agreement to another Person.

2.6 Security for Payment of Bills

2.6.1 Security for Payment of Bills

An applicant for Service who has not established credit satisfactory to BC Hydro will be required to:

1. Provide security in accordance with section 2.6.3 (Security), or
2. Participate in Pay As You Go Billing as set out in section 2.6.2 (Pay As You Go Billing), with no security.

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A Customer who has not maintained credit satisfactory to BC Hydro will be required to provide security or to increase the amount of existing security in accordance with section 2.6.3 (Security).

2.6.2 Pay As You Go Billing

Customers participating in Pay As You Go Billing will be billed by BC Hydro at the beginning of each month based either on an estimated average monthly bill or one-twelfth of the estimated annual bill for Service, subject to amendment by BC Hydro from time to time. Pay As You Go bills have the same force and effect as bills based on actual meter readings and must be paid in accordance with section 5.3 (Payment of Bills).

Any Customer participating in Pay As You Go Billing who has paid in full all amounts when due during the immediately preceding year may terminate Pay As You Go Billing and elect any other billing option then available to that Customer under the Service Agreement.

2.6.3 Security

The amount of security required will in each case be determined by BC Hydro in its discretion based on factors such as Energy consumption at the Premises and Customer account and credit history, provided that the security required by BC Hydro will not in any case exceed:

1. If the account is billed monthly, two times the average monthly bill of the Customer or, in the case of an applicant, two times the estimated average monthly bill;
2. If the account is billed bi-monthly, three times the average monthly bill of the Customer or, in the case of an applicant, three times the estimated average monthly bill; or

This security obligation may be satisfied by providing to BC Hydro a security deposit or, for a Customer taking Residential Service, a guarantee from a Guarantor. A security deposit must be in the form of cash or an equivalent form of security acceptable to BC Hydro and a guarantee must be in a form acceptable to BC Hydro.

2.6.4 Application and Return of Security

1. A security deposit may be returned to the Customer, or in the case of a guarantee provided by a Guarantor cancelled, at any time if, according to the records of BC Hydro, the Customer has at all times during the immediately preceding one year period maintained an account with BC Hydro and paid in full all amounts when due in accordance with the Service Agreement.

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- 2. BC Hydro may apply the whole or any part of the Customer’s security deposit and earned interest, if any, toward payment of any amount not paid by the Customer to BC Hydro on the due date shown on the bill. No application of the security deposit under this section will restrict BC Hydro's right to Terminate Service for the Customer’s failure to pay for Service. The Customer will promptly replenish the security deposit upon request by BC Hydro.
- 3. A cash security deposit and interest, if any, may be applied by BC Hydro in whole or in part toward payment of the final bill of the Customer on the billing date of the final bill.
- 4. A security deposit in a form other than cash may be applied by BC Hydro in whole or in part toward payment of the final bill of the Customer if all amounts owing are not paid on the due date shown on the bill.
- 5. If a Customer’s account is closed and a guarantee has been provided, BC Hydro may transfer to the Guarantor’s account any outstanding balance, up to the maximum amounts specified in section 2.6.3 (Security), within one year of the date on which the account was closed.
- 6. Any part of a security deposit, including interest, if any, on a cash security deposit, that has not been applied in accordance with this section will be refunded or returned to the Customer.
- 7. BC Hydro will pay interest on cash security deposits at a rate equal to BC Hydro’s weighted average cost of debt, calculated for BC Hydro’s most recent fiscal year.
- 8. Payment of interest on a cash security deposit held by BC Hydro will be made in the form of a credit to the Customer’s account each time the account is billed or added to the amount of the cash deposit when a refund is made as provided in paragraph 5 above.
- 9. BC Hydro will not pay interest on security deposits held by it in a form other than cash.
- 10. No interest will accrue on any security deposit after the billing date of the final bill for the account secured by the deposit.

2.7 Termination of Service by Customer

Except as otherwise provided in the Service Agreement, a Customer may Terminate Service by giving to BC Hydro at least 24 hours’ notice. The Customer continues to be subject to all

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applicable terms and conditions of the Service Agreement, including the obligation to pay for all Electricity provided to the Premises and all damage to and loss of wires, Metering Equipment or other apparatus of BC Hydro until the Termination date specified in the notice or 24 hours after BC Hydro receives such notice, whichever is later.

In cases where the Customer is a tenant and fails to provide notice of Termination in accordance with this section, the Owner will, pursuant to section 2.3 (Commencement and Term of Service) but subject to the terms of any rental premises agreement in effect pursuant to section 9.2 (Rental Premises Agreements), become the new Customer for the Premises on the day that its right to possession of the Premises commences and therefore assume responsibility for payment of Electricity used on the Premises from that date.

2.8 No Release of Customer Obligations

No Termination of Service will release a Customer from any previously existing obligations to BC Hydro under a Service Agreement or Financing Agreement or any other agreement with BC Hydro.

2.9 Customer Request for Disconnection

Upon receipt of a Customer request, BC Hydro will Disconnect the Customer’s Premises. The Customer will be responsible to pay for all Electricity used at the Premises until Disconnection in accordance with this section, unless Service is earlier Terminated by either the Customer or BC Hydro.

2.10 Re-Application for Service

Where a Customer Terminates Service to a Premises and that Person, or a co-occupant, representative or agent of that Person, applies for Service to the same Premises within 12 months of such Termination on the same Rate Schedule as previously applied, and regardless of whether Disconnection occurred, the applicant will pay the sum of:

1. The greater of the Minimum Reconnection Charge, as set out in section 11.3 (Minimum Reconnection Charges), or BC Hydro’s estimated cost to restore Service; and
2. The sum of the minimum charges the Customer would have paid between the time of Termination and the time that Service is restored, under this section.

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5. METER READING AND BILLING

5.1 Meter Reading

The interval between consecutive meter readings will be at the sole discretion of BC Hydro.

Where the Rate Schedule under which the Customer takes Service does not require measurement of the Customer’s Demand, the meter will normally be read once every two months; otherwise meters will normally be read once per month.

5.2 Billing

5.2.1 Regular Billing

Bills will be rendered on the basis of actual Energy consumed and, where applicable, Demand, as registered by a meter or meters and in accordance with the Rate Schedule under which the Customer takes Service, except:

1. Where the Service is not metered;
2. To the extent that section 6.3 (Late Payment Charge) applies;
3. Where the bill is being rendered in accordance with section 2.6.2 (Pay As You Go Billing), or section 5.6 (Monthly Equal Payments); or
4. Where section 5.2.2 (Change in Rate Schedule) applies.
5. Where a Customer Emergency Fund Grant has been issued, or a Customer Emergency Fund Return has been requested, by BC Hydro.

If meter readings cannot be obtained for any reason, including where the meter fails to register or registers incorrectly, the Demand or Energy consumption or both may be estimated by BC Hydro for billing purposes and the next bill for which actual meter readings are available will be adjusted for the difference between estimated and actual use over the interval between meter readings. Estimated bills are deemed to have the same force and effect under the Electric Tariff as bills that are based on actual meter readings.

If meters are read at longer or shorter intervals than the period set out in the Rate Schedule under which the Customer takes Service, the minimum charge, the service charge, the

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number of kilowatt hours in each step and, if applicable, the Demand charge set out in such Rate Schedule will be prorated before the bill is calculated based on a 365-day year.

5.2.2 Change in Rate Schedule

In circumstances where a Rate Schedule is changed and the effective date of the change falls between the dates of two successive meter readings, BC Hydro will render a bill determined upon a prorated basis.

5.3 Payment of Bills

Bills will be rendered as often as deemed necessary by BC Hydro. The amount payable as shown on a bill is owed to BC Hydro on the billing date. To avoid a Late Payment Charge under section 6.3 (Late Payment Charge), the amount payable must be paid in full on or before the due date shown on the bill, which will be:

1. The first business day after the 21st calendar day following the billing date; or
2. Such other period as may be defined in an Electric Tariff Supplement or otherwise agreed by the Customer and BC Hydro.

Bills may be paid by any payment method set out at www.bchydro.com/payments. Information on bill payment options can also be obtained by contacting the customer service department of BC Hydro.

5.4 Billing of Fractional Demand

A Billing Demand that includes a fraction will be deemed to be the nearest whole unit of Demand below that fraction.

The minimum Billing Demand will, except where the context otherwise requires, be deemed to be 1 kW or 1 kVA, whichever is applicable.

5.5 Waiver of Minimum Charges

Where the Owner of a motel or mobile home park is the Residential Service Customer for any separately metered unit of accommodation in the motel or mobile home park, whether pursuant to BC Hydro requirements or otherwise, and if no Electricity is consumed in such unit during an interval between meter readings, the minimum charge otherwise applicable to such interval will be waived.

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In multi-unit residential buildings where separate meters for the units are installed during construction of the building, minimum charges will apply only after Service to the relevant unit is energized.

5.6 Monthly Equal Payments

On application by a Customer, BC Hydro will, provided the Customer’s credit is established to the satisfaction of BC Hydro, permit the Customer to pay fixed monthly installments on account of Electricity consumed by the Customer during all or any part of a 12-month period commencing with an actual meter reading at the Customer’s Premises (the Budget Period). Monthly installments will be fixed so that the sum of the installments to be paid during the Budget Period equals the amount BC Hydro estimates will be payable under the applicable Rate Schedule for Electricity consumed during the Budget Period. BC Hydro may at any time revise its estimate of a Customer’s consumption and increase or decrease the amount of monthly installments payable by the Customer accordingly.

Payment of monthly installments pursuant to this section may be terminated by the Customer at any time by giving five days' notice of termination to BC Hydro, or by BC Hydro without notice if the Customer has not maintained credit to the satisfaction of BC Hydro.

At the end of each Budget Period or upon its earlier termination the amount payable by the Customer to BC Hydro for Electricity actually used during the Budget Period will be compared against the sum of the monthly installments paid by the Customer during that period, and any deficit will be paid by the Customer to BC Hydro, and any excess will be paid or credited by BC Hydro to the Customer on the next bill.

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5.7 Back-Billing

Pursuant to the *Utilities Commission Act*, this Electric Tariff constitutes the consent of the British Columbia Utilities Commission to allow BC Hydro, in the circumstances herein specified, to charge, demand, collect and receive from its Customers in respect of a regulated service rendered a greater or lesser compensation than that specified in the Terms and Conditions or applicable Rate Schedules.

1. Back-billing means the re-billing by BC Hydro for services rendered to a Customer because the original billings were discovered to be either too high (over-billed) or too low (under-billed). The discovery may be made by either the Customer or BC Hydro, including as a result of an inspection under the *Electricity and Gas Inspection Act (Canada)*. The cause of the billing error may include any one or more of the following non-exhaustive reasons:
 - (a) Stopped meter
 - (b) Metering Equipment failure
 - (c) Missing meter now found
 - (d) Switched meters
 - (e) Double metering
 - (f) Incorrect meter connections
 - (g) Incorrect use of any prescribed apparatus respecting the registration of a meter
 - (h) Incorrect meter multiplier
 - (i) Application of an incorrect rate
 - (j) Incorrect reading of meters or data processing, and
 - (k) Tampering, fraud, theft or any other criminal act.

2. Whenever the dispute procedure of the *Electricity and Gas Inspection Act (Canada)* is invoked, the provisions of that Act will apply, except insofar as they purport to determine the nature or extent of legal liability flowing from metering or billing errors.

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3. Where metering or billing errors occur and the dispute procedure under the *Electricity and Gas Inspection Act (Canada)* is not invoked, Energy consumption and Demand for billing purposes will be determined based on the records of BC Hydro or, to the extent they are available and accurate, the records of the Customer, or if no such records are available, based on BC Hydro’s reasonable and fair estimates made consistently within each Customer class or according to the agreement for Service with the Customer, if applicable.
4. In every case of under-billing or over-billing, the cause of the error will be remedied without delay, and the Customer will be promptly notified of the error and of the effect upon the Customer's ongoing bill.
5. The provisions of paragraph 7 below do not apply and, subject to the applicable limitation period provided by law, back-billing may be applied for the whole period of under-billing or over-billing if:
 - (a) There are reasonable grounds to believe that the Customer has tampered with or otherwise used BC Hydro's Service in an unauthorized way, or evidence of fraud, theft or another criminal act exists, or if a reasonable Customer should have known of an under-billing and failed to promptly bring it to the attention of BC Hydro; or
 - (b) The required adjustment to the Customer’s bill is minor, such as in the case of an estimated bill under section 5.2.1 (Regular Billing) or section 5.6 (Monthly Equal Payments); or
 - (c) The required adjustment to the Customer’s bill relates to the under-billing or over-billing of a standard charge set out in section 11 (Schedule Standard Charges), except Legacy Meter Charges and Radio-off Meter Charges under section 11.4 (Miscellaneous Standard Charges).

In addition, the Customer is liable for the direct (unburdened) administrative costs incurred by BC Hydro in the investigation of any incident of tampering, unauthorized use or criminal activity, including the direct costs of repair and replacement of equipment.

Under-billing resulting from circumstances described in this paragraph 5 will bear interest at the rate normally charged by BC Hydro on unpaid accounts from the date of the original under-billed invoice until the amount under-billed is paid in full.

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- 6. In every case of over-billing, BC Hydro will refund to the Customer all money incorrectly collected for the duration of the error, except that if the date the error first occurred cannot be determined with reasonable certainty, the maximum refund period will be two years back from the date the error was discovered. Interest will be paid to the Customer at a rate equal to BC Hydro’s weighted average cost of debt, calculated for BC Hydro’s most recent fiscal year.
- 7. Subject to paragraph 5 above, in every case of under-billing, BC Hydro will back-bill the Customer for the duration of the error up to a maximum of:
 - (a) Six months for Residential Service, small General Service (commercial) or Irrigation Service Customers; and
 - (b) One year for all other Customers or such other time period as is set out in a special or individually negotiated contract with BC Hydro.

BC Hydro will offer under-billed Customers reasonable terms of payment for the under-billed amount; if requested by the Customer, the payment term will be equivalent in length to the back-billing period. All under-billed amounts will be interest free and be billed and paid in equal installments corresponding to the normal billing cycle. Delinquency in payment of such installments will, however, be subject to the usual Late Payment Charges pursuant to section 6.3 (Late Payment Charge).

If a Customer disputes BC Hydro’s assessment of an under-billed amount based on Energy consumption or Demand or duration of the error, BC Hydro will not threaten or cause Termination as a result of Customer’s failure to pay the disputed portion of the back-billing, unless there are no reasonable grounds for the Customer to dispute same. The undisputed portion of the bill will be paid by the Customer and BC Hydro may threaten or cause Termination if such undisputed portion of the bill is not paid.

- 8. Subject to paragraph 5 above, in all instances of back-billing where changes of occupancy have occurred, BC Hydro will make a reasonable attempt to locate the former Customer. If, after a period of one year, such Customer cannot be located, the over- or under-billing applicable to that Customer will be cancelled.

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6. OTHER

RATE SCHEDULE 1901 – DEFERRAL ACCOUNT RATE RIDER

Applicability	The Deferral Account Rate Rider as set out below applies to all charges payable under other Rate Schedules of the Electric Tariff except for Rate Schedule 1903 and Electric Tariff Supplement Nos. 7, 8, 39 and 77.
Deferral Account Rate Rider	A charge equal to 5% of all amounts otherwise payable under the applicable Rate Schedule, before taxes and levies.

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6. OTHER

RATE SCHEDULE 1903 – CUSTOMER EMERGENCY FUND RATE RIDER

Applicability	The Customer Emergency Fund Rate Rider as set out below applies to Residential Rate Schedules 1101/1121, 1107/1127, 1148, and 1151/1161.
Customer Emergency Fund Rate Rider	A charge of .0082 ¢ per day, before taxes and levies.

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Customer Emergency Fund Application

Appendix C

Summary of Ontario

**Low Income Energy Assistance Program
Emergency Financial Assistance Offering**

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1 Overview¹

The Ontario Low Income Energy Assistance Program (**LEAP**) offers Emergency Financial Assistance (**EFA**) to qualified electricity and gas customers to help avoid disconnection and/or reconnect services. It is essentially an income-based program. LEAP EFA has been in existence since 2011.²

LEAP EFA operates under a framework set by the Ontario Energy Board (**OEB**) and is delivered by Local Distribution Companies (**LDCs**), which, in turn, are partnered with a specific social agency or agencies to deliver the LEAP EFA.

2 LEAP EFA Applicant Process³



The figure above illustrates the general application process for the LEAP EFA. The following sections provide some further details of the process.

2.1 Applicant

For customers to qualify for the LEAP EFA, the following criteria apply:

- Being customers of natural gas or electricity distributors or sub meter providers⁴ (mandatory);

¹ The information provided in this appendix is based on BC Hydro's review of the sources cited in this document.

² OEB, Low-Income Energy Assistance Program (LEAP) Emergency Financial Assistance (EFA) and Customer Service Rules, LIEN Annual Conference – March 27, 2013, <http://www.lowincomeenergy.ca/assets/sitedocs/2013/04/Low-Income-Energy-Assistance-Program-LEAP-Rachel-Anderson-OEB.pdf>, slide 4.

³ OEB, OESP & LEAP Program Manual, October 2015, http://www.ontarioenergyboard.ca/oeb/Documents/Documents/OESP_LEAP_Program_Manual.pdf, page 41.

⁴ *Ibid*, page 17.

-
- Residing at the address for which there are arrears⁵ (mandatory);
 - Having an after-tax household income at or below the thresholds set out in the OEB's Ontario Electricity Support Program sliding scales;⁶
 - Having consented to be referred to a conservation program;⁷ and
 - Having provided the required documentation for application.⁸

In order to accommodate the unique needs of intake agencies and service providers, some aspects of the administration of LEAP EFA have been left to the discretion of those agencies and service providers.⁹ Where discretion is exercised, the agency or the service provider should have documented their rationale for doing so.¹⁰

The documents required to process the application for the grant include:¹¹

- An identification document;
- Completed LEAP EFA application form;
- Copy of the energy bill;
- Copy of the applicant's income stub, employment letter, and/or income tax return for all adult occupants within the household;
- Copy of the signed Consent to Disclose Information form;
- Copy of the proof of rent or mortgage amounts;
- Copy of the most recent monthly bank statement; and
- Copy of the disconnection notice.

⁵ *Ibid*, page 17.

⁶ *Ibid*, page 17, Appendix B, Appendix C, Have a pre-tax household income at or below the Statistics Canada LICO + 15 per cent.

⁷ *Ibid*, page 32.

⁸ *Ibid*, page 38.

⁹ *Ibid*, page i.

¹⁰ *Ibid*, page 17.

¹¹ Ontario Energy Board, LEAP Program, accessed February 17, 2017: <https://www.oeb.ca/rates-and-your-bill/help-low-income-consumers/low-income-energy-assistance-program>.

Based on the information reviewed by BC Hydro, the most common characteristics of LEAP EFA applicants are as follows:¹²

- Dwelling Type: House (74 per cent); and
- Housing Type: Private Rental (58 per cent).

The family type is as follows:

- Single with children (32 per cent);
- Single with no children (32 per cent);
- Average Monthly Income: \$1,681; and
- Average Arrears: \$550.

2.2 Third Party Involvement

The Ontario program involves third-party social agencies. Referrals to the program come from a variety of sources, including utility customer service representatives, community service agencies, 211 Ontario, the OEB's Consumer Relations group and offices of government and/or political representatives.¹³ Each utility is partnered with one or more social agency for the delivery of LEAP EFA, but most local distributions companies use only one delivery agency. The current list of social agencies that each utility is partnered with can be found at: https://www.oeb.ca/oeb/Documents/EB-2008-0150/LEAP_Utility-Agency_Partners.pdf.

For the LEAP EFA, the following key entities are involved, and each entity's main function is briefly summarized below:¹⁴

¹² OEB, *2014 LEAP Emergency Financial Assistance & Winter Warmth Results*, http://cf.oeb.ca/oeb/Documents/EB-2008-0150/OEB_Ltr_2014_LEAP_Results_20160504.pdf, slide 26.

¹³ OEB, *OESP & LEAP Program Manual*, October 2015, http://www.ontarioenergyboard.ca/oeb/Documents/Documents/OESP_LEAP_Program_Manual.pdf, page 3.

¹⁴ As noted in the OEB, *OESP & LEAP Program Manual*, October 2015, http://www.ontarioenergyboard.ca/oeb/Documents/Documents/OESP_LEAP_Program_Manual.pdf, at page 14, the division of the responsibilities between lead and intake agencies may vary, and in some communities, LEAP EFA may be delivered by one agency, which has the responsibilities for all functions.

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- **Intake Agency:** the entity that performs application intake for the LEAP EFA, including screening applications for eligibility and collecting the necessary information for application processing.
 - **Lead Agency:** the entity responsible for managing intake agencies and other responsibilities in the LEAP EFA program, including making final decisions as to whether to approve or deny applications based on recommendations from intake agencies.
 - **Natural Gas and Electric Distribution Companies:** companies operating in a portion of a utility grid, and that distribute energy to people's homes, that will be responsible for collecting the amount of money from ratepayers for LEAP EFA established by the OEB.

3 Grant Level¹⁵

The grant level for LEAP EFA is set at a maximum of \$500 per fuel, per household, per year. Agencies may use their judgement for customers with electrically heated homes to offer up to \$600 per household, if necessary.

If the applicant owes less than the maximum, the grant cannot exceed the amount owed.

If the applicant owes more than the maximum, a maximum grant of \$500 (or \$600 for an approved electrically heated home) may be provided, as long as the applicant will be able to sustain their energy service following the grant.

4 Flow of Money

Some of the key aspects of the funding and disbursement and spending of the funding include the following:

- The program is funded by all ratepayers through each distributor's rates;¹⁶

¹⁵ *Ibid*, page 24.

-
- Private donations may be given to social agencies to supplement LEAP EFA funding;¹⁷
 - Grants are applied directly to successful applicants' accounts;¹⁸ and
 - The total money allocated for agency administration and program delivery must not exceed 15 per cent.¹⁹

5 Program Results

5.1 First Year Results²⁰

To provide a view of the LEAP EFA in its earlier operating years, BC Hydro provides the following results from January 1, 2011 to December 31, 2011:

- Approximately 83 utilities (gas and electric), with 120 social service agency partners, delivered LEAP;
- Fifty one electric utilities fully exhausted their LEAP funds;
- Most applications for EFA were received in March;
- Of the applicants that were denied:²¹
 - ▶ Twenty per cent did not meet eligibility criteria;
 - ▶ Fifteen per cent denied due to lack of funds available;
 - ▶ Two per cent had already accessed EFA during program year; and
 - ▶ Sixty-three per cent for “other reasons” such as having referrals to other programs or applicants failing to provide required documentation.

¹⁶ *Ibid*, page 2.

¹⁷ *Ibid*, page 2.

¹⁸ *Ibid*, page 23.

¹⁹ *Ibid*, page 43.

²⁰ OEB, Low-Income Energy Assistance Program (LEAP) Emergency Financial Assistance (EFA) and Customer Service Rules, LIEN Annual Conference – March 27, 2013, <http://www.lowincomeenergy.ca/assets/sitedocs/2013/04/Low-Income-Energy-Assistance-Program-LEAP-Rachel-Anderson-OEB.pdf>, slide 32.

²¹ Only 45 utilities (serving about 75 per cent of customers) reported this data in the first year of the program.

5.2 EFA Program Results (Electricity Distributors Only)

The following table provides certain information on the program results from 2011 to 2014.

	2011 ²²	2012 ²³	2013 ²⁴	2014 ²⁵
Total LEAP EFA Funds Available (\$)	4,308,440 ²⁶	4,733,771 ²⁷	5,031,449	5,536,646
Administrative Costs	598,287 (14%)	Not reported.	Not reported.	723,282 (13%)
Net LEAP EFA Funds Available (\$)	3,710,153	Not reported.	Not reported.	Not reported.
Total Funds Provided to Customers (\$)	3,138,948	3,946,644	4,279,839	\$4,762,007
LEAP EFA Applicants	10,279	Not reported.	11,462	11,583
Number of Customers Assisted	7,756 (75%)	8,053	9,293 (81%)	9,656 (83%)
Number of Customers Rejected	2,523 (25%)	Not reported.	2,170 (19%)	1,927 (17%)
Average Grant per Customer (\$)	405	432	399	418

6 Marketing Approach

The following tactics were used to market the program. They are presented in order of descending impact.²⁸

- Utility referral;
- Social agency;
- Word of mouth;

²² OEB, *Low-Income Energy Assistance Program (LEAP) Emergency Financial Assistance (EFA) and Customer Service Rules*, LIEN Annual Conference – March 27, 2013, <http://www.lowincomeenergy.ca/assets/sitedocs/2013/04/Low-Income-Energy-Assistance-Program-LEAP-Rachel-Anderson-OEB.pdf>, slide 33.

²³ OEB, *2012 LEAP Emergency Financial Assistance & Winter Warmth Results*, September 9, 2013, https://www.oeb.ca/oeb/Documents/EB-2008-0150/OEB_Correp_Announce2012Results_20130909.pdf, page 3.

²⁴ OEB, *2014 LEAP Emergency Financial Assistance & Winter Warmth Results*, http://cf.oeb.ca/oeb/Documents/EB-2008-0150/OEB_Ltr_2014_LEAP_Results_20160504.pdf, page 1, slide 9.

²⁵ *Ibid.*

²⁶ \$278,282 in charitable donations was provided.

²⁷ \$224,546 in charitable donations was provided.

²⁸ OEB, *2014 LEAP Emergency Financial Assistance & Winter Warmth Results*, http://cf.oeb.ca/oeb/Documents/EB-2008-0150/OEB_Ltr_2014_LEAP_Results_20160504.pdf, slide 34.

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- Ontario Works (**OW**)/Ontario Disability Support Program (**ODSP**);
 - Bill insert;
 - Utility website;
 - TV;
 - Paper;
 - Radio;
 - Poster; and
 - OEB Consumer Relations Centre (**CRC**).

7 Auditing and Reporting

The LEAP EFA has monthly and annual reporting requirements and a files and record retention policy. The reporting requirements are extensive and are listed in Appendix F of the OESP & LEAP Program Manual, which can be found at: https://www.oeb.ca/oeb/Documents/Documents/OESP_LEAP_Program_Manual.pdf.

All application forms and corresponding documentation (whether the application is approved or not) are to be filed and stored by intake agencies in compliance with applicable legal requirements and any instructions of the OEB. They should be retained for seven years unless the OEB directs otherwise.

Customer Emergency Fund Application

Appendix D

Summary of Manitoba Neighbours Helping Neighbours Program

Table of Contents

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1.1	Manitoba Hydro Customers Profile	1
2	Eligibility	3
3	Grant Level.....	3
4	Main Program Attributes.....	4
5	Program Results'	5

1 Overview

Neighbours Helping Neighbours (NHN), a program jointly administered with the Salvation Army,¹ provides one time emergency funding of up to \$400 for low income families or seniors who are unable to pay their natural gas and/or electricity bill due to an emergency situation, crisis, or temporary hardship.² It also provides referrals to community support services, counselling and job training.³ NHN was developed with stakeholder engagement⁴ and first launched in 2004.⁵

Manitoba Hydro's operating manual for the NHN can be found at the following site, beginning on pdf page 183 of 202:

https://www.hydro.mb.ca/regulatory_affairs/electric/gra_2014_2015/ir_pdf/rd2_mmf.pdf.

The following website also provides information on the program:

https://www.hydro.mb.ca/community/neighbours_helping_neighbours/index.shtml.

1.1 Manitoba Hydro Customers Profile

As a percentage of total residential households serviced by Manitoba Hydro:⁶

- 14 per cent of households spend 6 per cent or more of their total income on energy bills; and
- 4.2 per cent of households spend more than 10 per cent of their income on energy bills.

¹ Manitoba Hydro, *Neighbours Helping Neighbours*, https://www.hydro.mb.ca/community/neighbours_helping_neighbours/, accessed February 20, 2017.

² Manitoba Hydro Bill Affordability Collaborative Process, *Summary Report and Recommendations*, January 2017, page 19.

³ Manitoba Hydro, *Neighbours Helping Neighbours*, https://www.hydro.mb.ca/community/neighbours_helping_neighbours/, accessed February 20, 2017.

⁴ Manitoba Hydro Bill Affordability Collaborative Process, *Summary Report and Recommendations*, January 2017, page 8.

⁵ Neighbours Helping Neighbours, *2016-2017 Annual Report*, https://www.hydro.mb.ca/community/neighbours_helping_neighbours/nhn_annual_report_2016_17.pdf.

⁶ Manitoba Hydro Bill Affordability Collaborative Process, *Summary Report and Recommendations*, January 2017, page 16.

-
- Customers participating in NHN must have an income lower than 125 per cent of the current Statistics Canada Low-Income Cut-Off (LICO-125).⁷

The lower income customer base is greater amongst:⁸

- Indigenous (i.e., of First Nations, Metis or Inuit ancestry);
- Customers with older homes and/or homes that are electrically heated versus natural gas heated, and
- Households with either a single member or five or more members.

Payment issues are substantially more widespread among:⁹

- Rural and northern customers; and
- Electrically heated versus natural gas heated households.

Neighbours Helping Neighbours families in Winnipeg in 2016/2017 were:¹⁰

- Fifty-four per cent employed;
- Twenty-four per cent unemployed;
- Four per cent disability;
- Seven per cent employment insurance;
- Two per cent student; and
- Nine per cent retired.

⁷ Manitoba Hydro Bill Affordability Collaborative Process, *Summary Report and Recommendations*, January 2017, page 16. In other words, Manitoba Hydro uses 125% of the federal government Low Income Cut Off to define the lower income customer base.

⁸ Manitoba Hydro Bill Affordability Collaborative Process, *Summary Report and Recommendations*, January 2017, page 16.

⁹ Manitoba Hydro Bill Affordability Collaborative Process, *Summary Report and Recommendations*, January 2017, page 17.

¹⁰ Neighbours Helping Neighbours, *2016-2017 Annual Report*, https://www.hydro.mb.ca/community/neighbours_helping_neighbours/nhn_annual_report_2016_17.pdf.

2 Eligibility¹¹

To apply for the NHN assistance, the customer must make an appointment with the Salvation Army Neighbours Helping Neighbours program director.

A Manitoba Hydro customer is eligible to receive financial assistance from the NHN if he or she meets the following criteria:

- Not receiving social assistance;
- Currently in 60 days arrears or greater;
- Having a final or shut off/disconnection notice;
- Having not previously received assistance from this program;
- Willing to meet with the Salvation Army to fill out an application and provide proof of income for all household members for the current year; and
- Willing to submit an application to Manitoba Hydro's Affordable Energy Program. The Salvation Army will assist the customer in completing the Affordable Energy Application.

3 Grant Level

The grant from the NHN program can be up to a maximum of \$400.¹²

NHN grant recipient accounts are reviewed one year and two years later after receiving the grant.¹³

¹¹ Manitoba Hydro, *Neighbours Helping Neighbours*, https://www.hydro.mb.ca/community/neighbours_helping_neighbours/, accessed February 20, 2017.

¹² Communication with Manitoba Hydro, March 1, 2017.

¹³ *Ibid.*

4 Main Program Attributes

Manitoba Hydro's NHN program is one-time emergency funding to assist with energy bills, and has the following main attributes:

- Manitoba Hydro relies on private donations to fund the program; but historically donations have not been sufficient to cover the funds needed by the program;
- Manitoba Hydro has made up the balance of funds required to meet the need of applicants, essentially covering shortfalls in donations;¹⁴ and
- The program is managed by the Salvation Army, and a community council oversees the program, with members from:
 - ▶ Central Neighbourhood Development Corporation
 - ▶ United Way
 - ▶ Community Ministries Worker
 - ▶ Manitoba Hydro
 - ▶ Winnipeg Regional Health Authority
 - ▶ Salvation Army, DHQ
 - ▶ Salvation Army, Weetamah.¹⁵
- Salvation Army sets a budget each year.
- Currently Manitoba Hydro is invoiced by the Salvation Army for actual expenses on a monthly basis.

¹⁴ Manitoba Hydro Bill Affordability Collaborative Process, *Summary Report and Recommendations*, January 2017, page 35.

¹⁵ Neighbours Helping Neighbours, *2015-2016 Annual Report*, https://www.hydro.mb.ca/community/neighbours_helping_neighbours/nhn_annual_report_2015_16.pdf.

5 Program Results^{16,17}

In Manitoba, 7,067 families received assistance from the program since 2004. The following chart provides some details regarding the grant:

	2010/2011	2011/2012	2012/2013	2013/2014	2014/2015	2015/2016
Number of Referrals	1,983	2,343	1,871	2,376	1,867	1,040
Number of Grants	707	949	823	1,164	713	578
Total Assistance Grants (\$)	275,000	399,333	349,707	476,569	201,397	123,874
(\$)¹⁸	389	421	425	409	282	214

Please note the following:

- 2013/2014 – the grant spiked because of centralized collections (Winnipeg).
 - ▶ Once calls were going through Winnipeg, agents were more knowledgeable in explaining the program, which led to an increase in grants.
- 2014/2015 - Manitoba Hydro changed some of the eligibility criteria.
 - ▶ As an example, “extenuating circumstances” was removed.
- Overall trend should be downward because grants can only be accessed once.
- In 2015/2016, the program funds were not exhausted. That is, there was a surplus (deficit) to be carried forward \$96,353.
 - ▶ Previously Salvation Army made quarterly requests for anticipated grants and fees.
 - ▶ The surplus was a carry-over from an over estimation of the 2014/2015 budget.

¹⁶ Neighbours Helping Neighbours, 2015-2016 Annual Report, https://www.hydro.mb.ca/community/neighbours_helping_neighbours/nhn_annual_report_2015_16.pdf.

¹⁷ Communication with Manitoba Hydro, March 1, 2017.

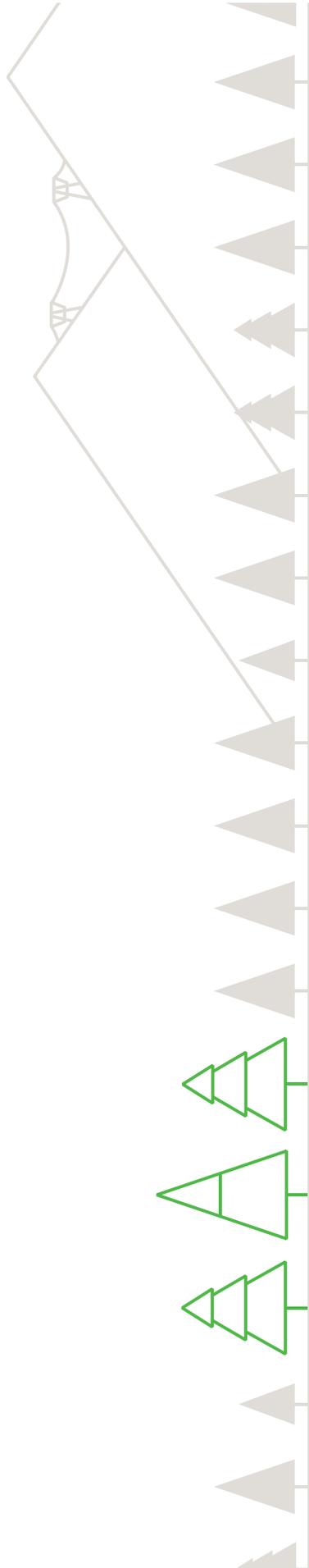
¹⁸ The amount in this row represents the calculated value of an average grant (e.g., \$275,000/707 for year 2010/2011).

Customer Emergency Fund Application

Appendix E

Summary Results from BC Hydro Your Power Poll on CEF

2017 Customer Emergency Fund (CEF) Research – BC Hydro Your Power Poll Results

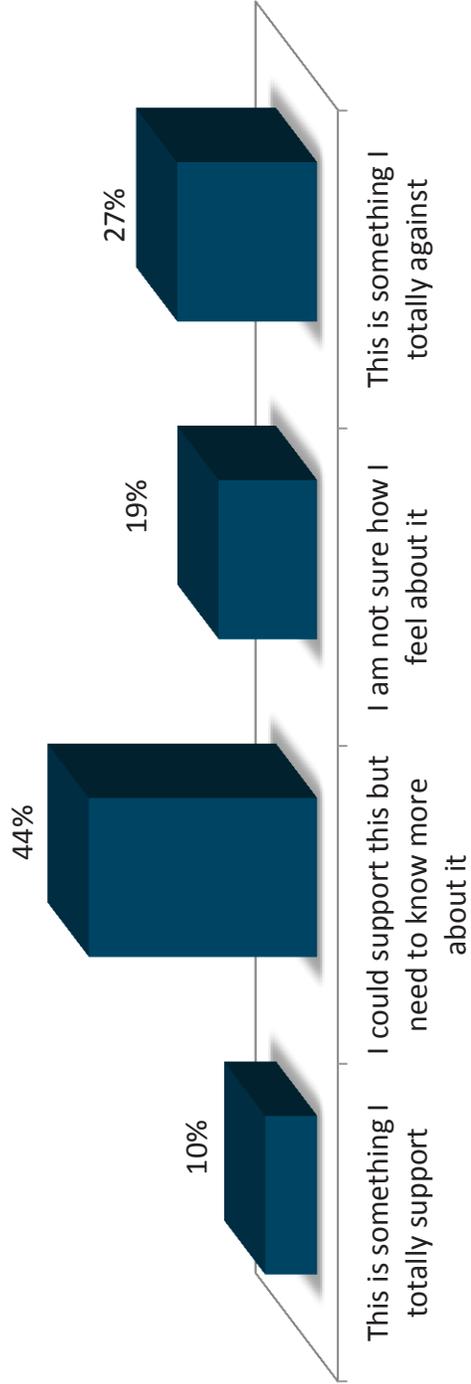


March 2017

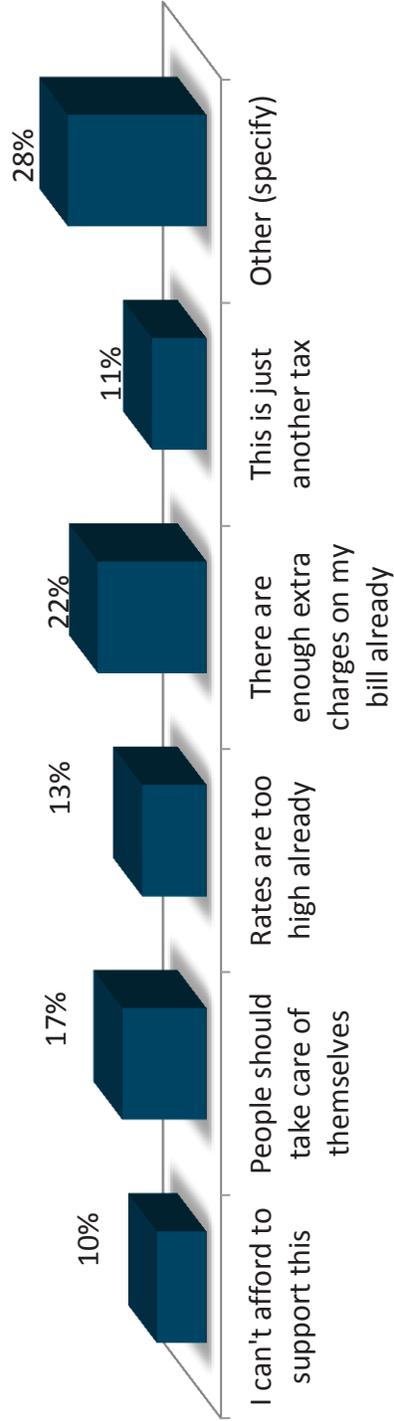
BC Hydro Your Power Poll

Your Power Poll is an online community of 4,900 self-selected, volunteer BC Hydro residential customers that are used on a regular basis primarily to give direction and for non-policy related work. During CEF pilot program research, it was used to inform the moderators guide for the focus group research. Results of Your Power Poll are not necessarily representative of the total population. Although the community is proportionate to BC Hydro's customer service territory, Your Power Poll participants are slightly skewed to higher income, education, age and are more positive to BC Hydro as a company compared to the general population.

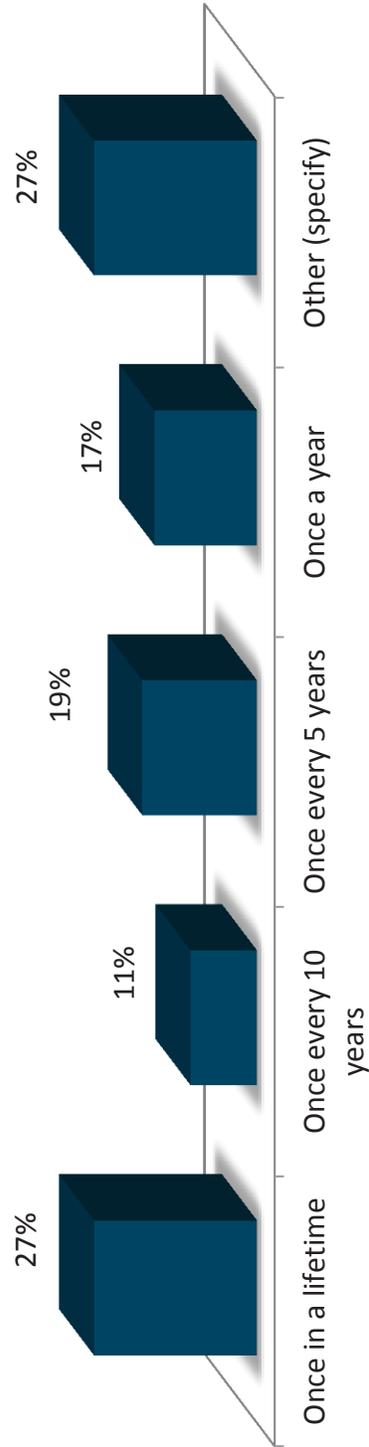
How do you feel about 25 cents being added each month to your electricity bill to go into this fund?



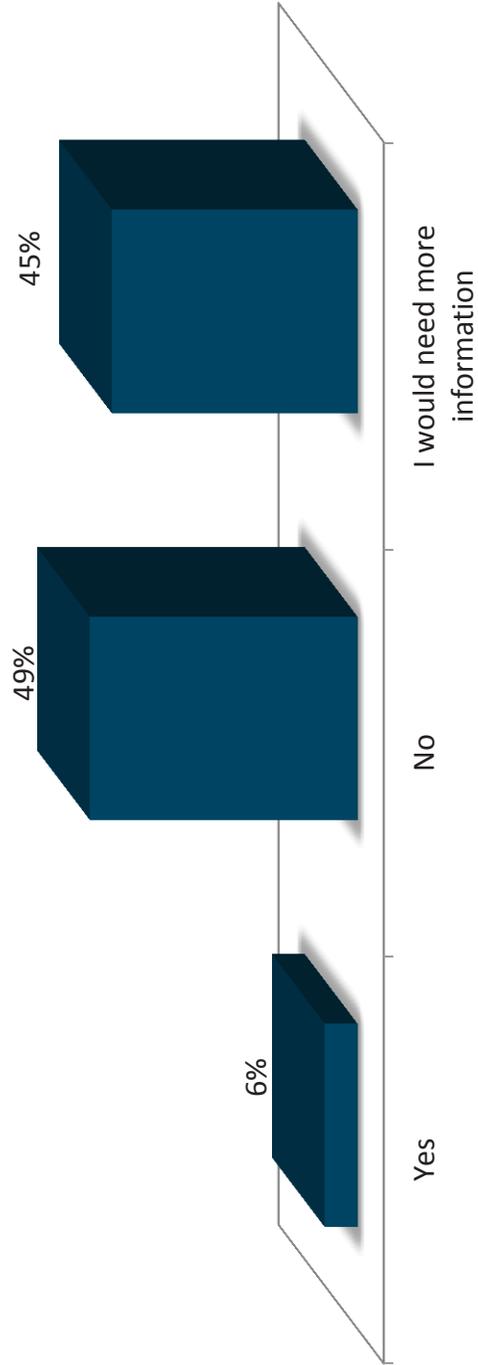
What is your main reason for not being supportive of such a program?



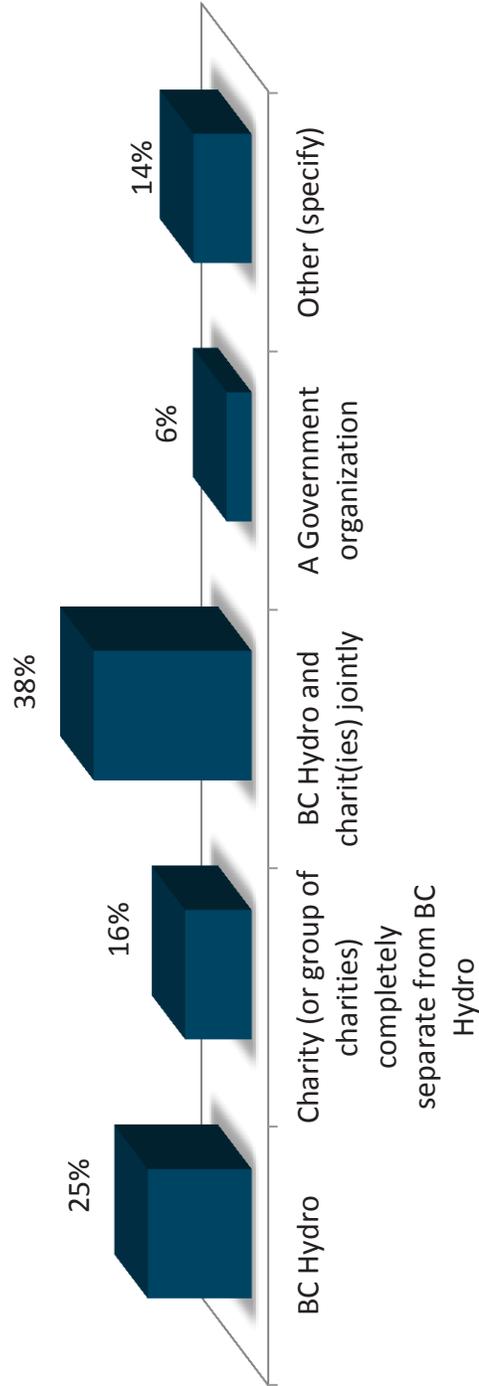
If the fund helps out someone who has a crisis and pays their electricity bill, should the fund be designed to help only...



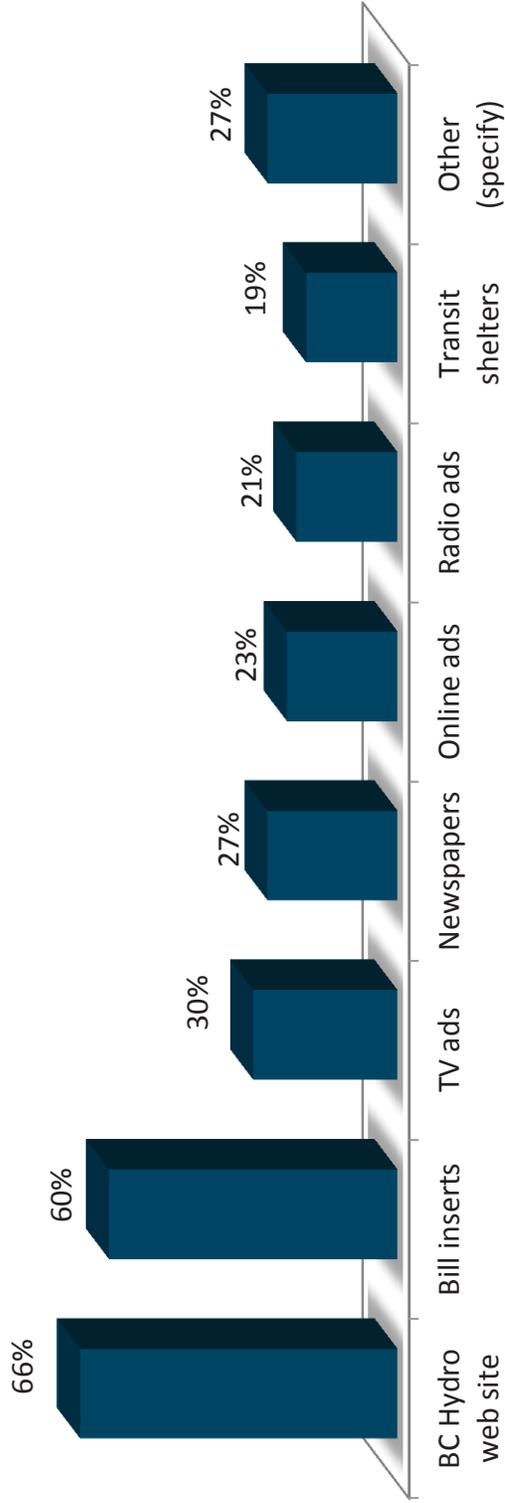
If you could contribute more than 25 cents per month, would you want to?



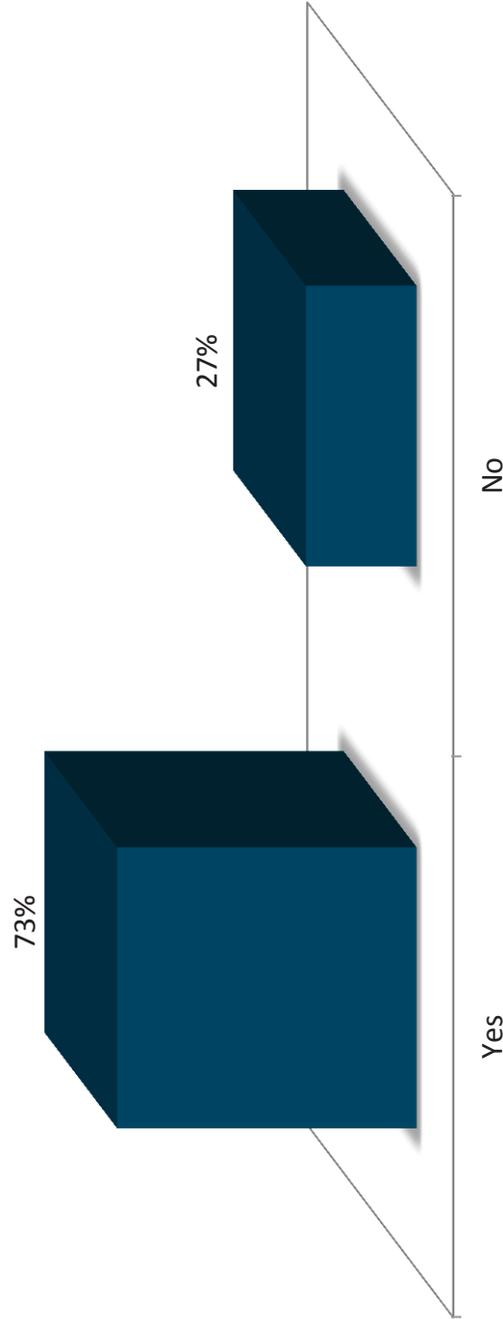
Who should run this fund?



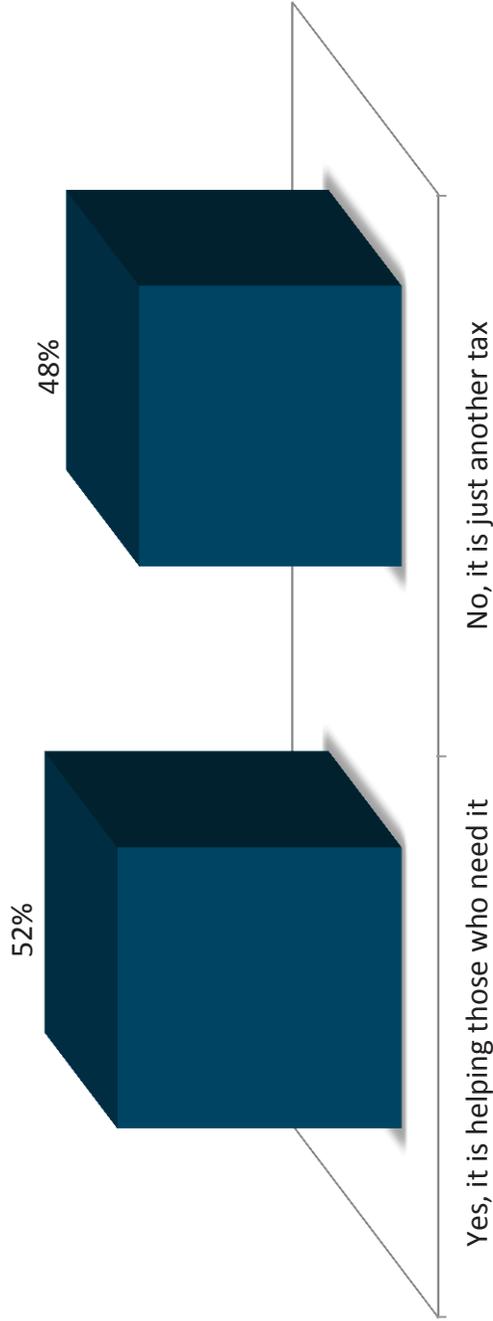
How would you want to find out (about the fund)?



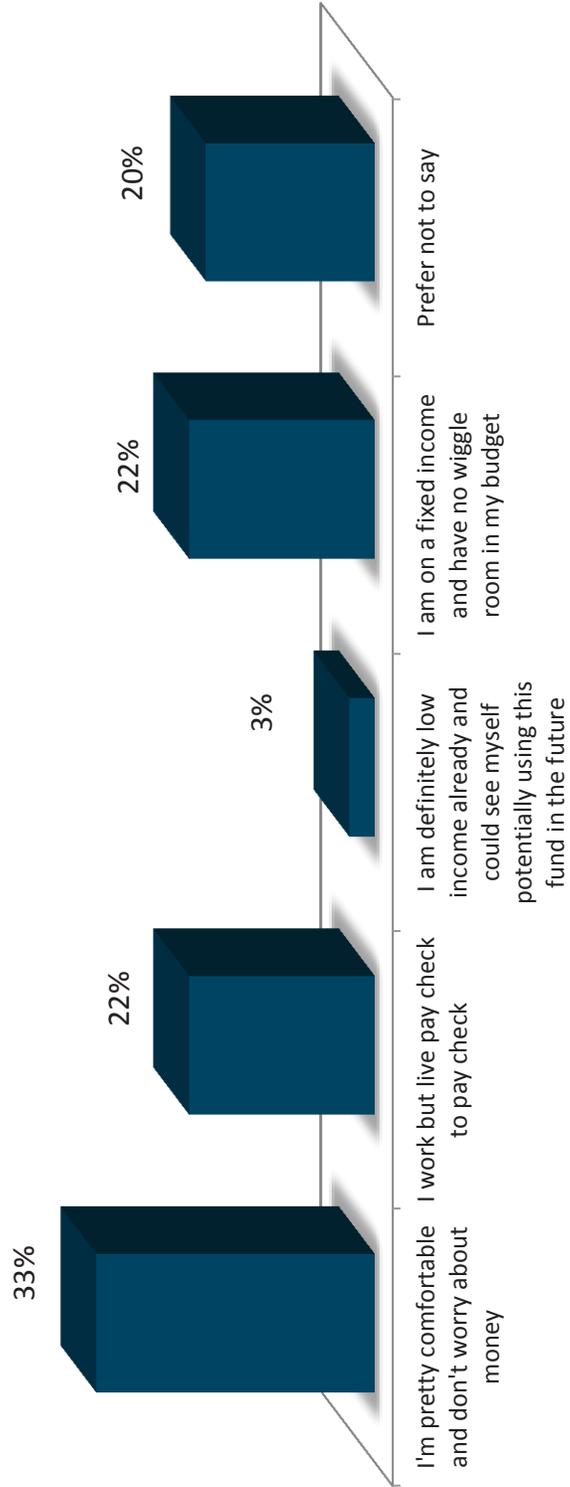
Do you see this program benefiting participants?



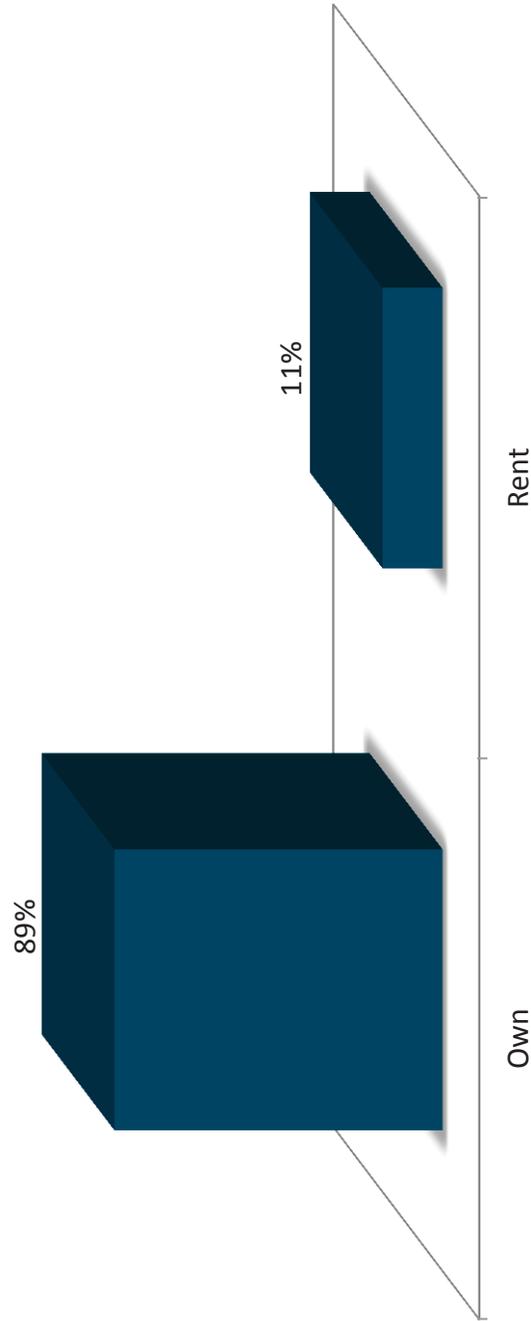
Do you see this program benefiting non-participants?



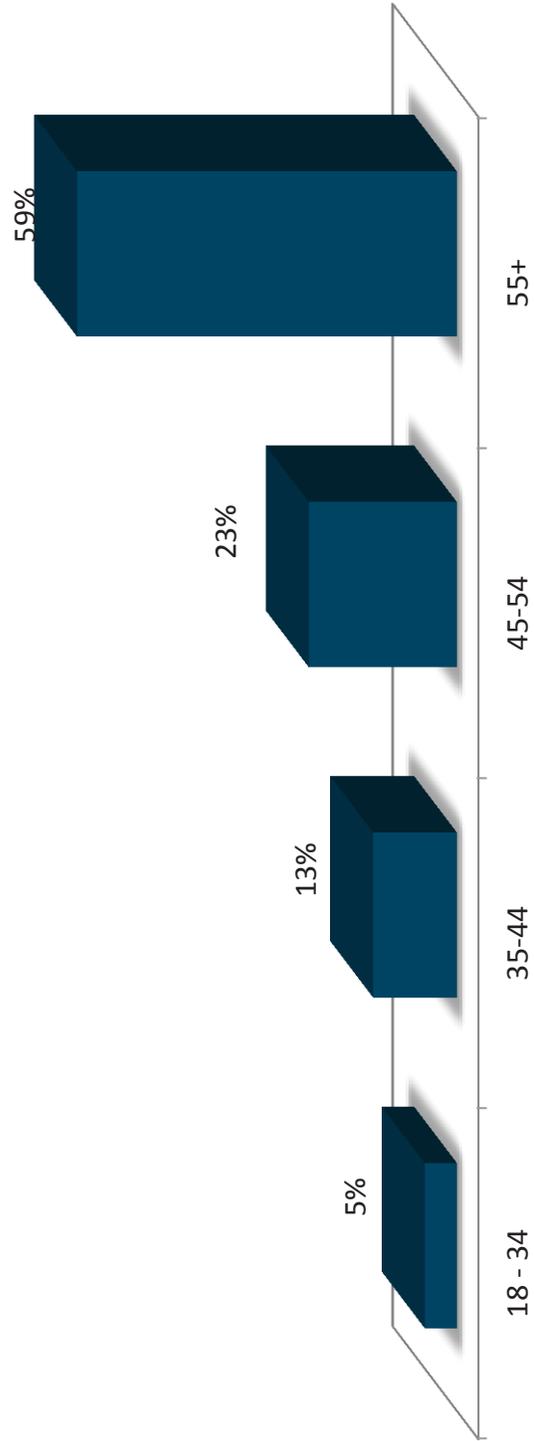
How would you classify yourself?



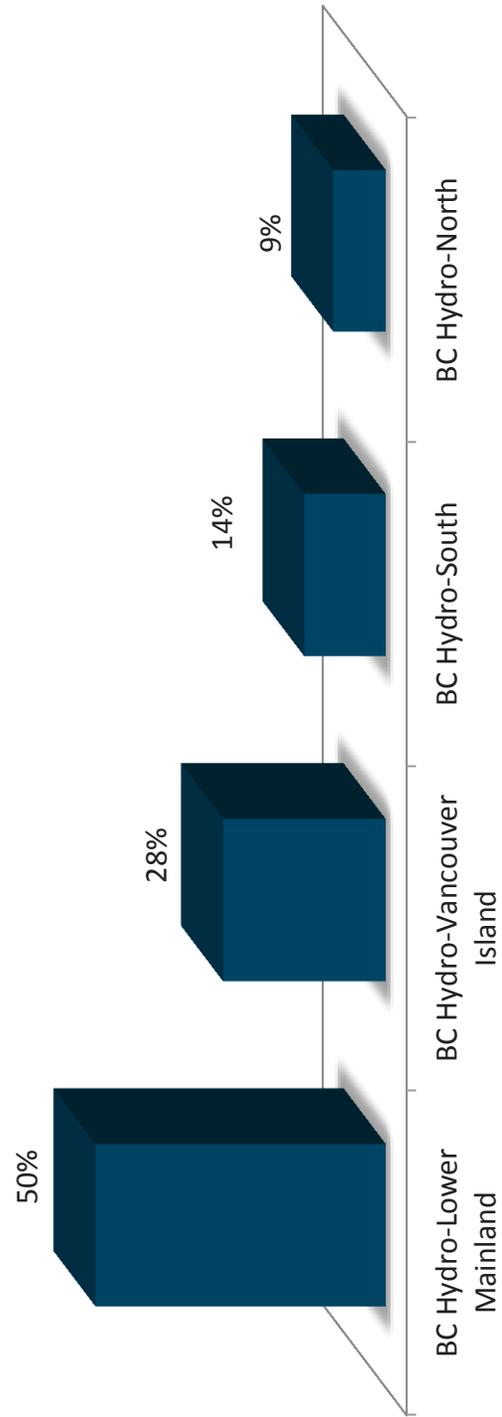
Own vs. Rent?



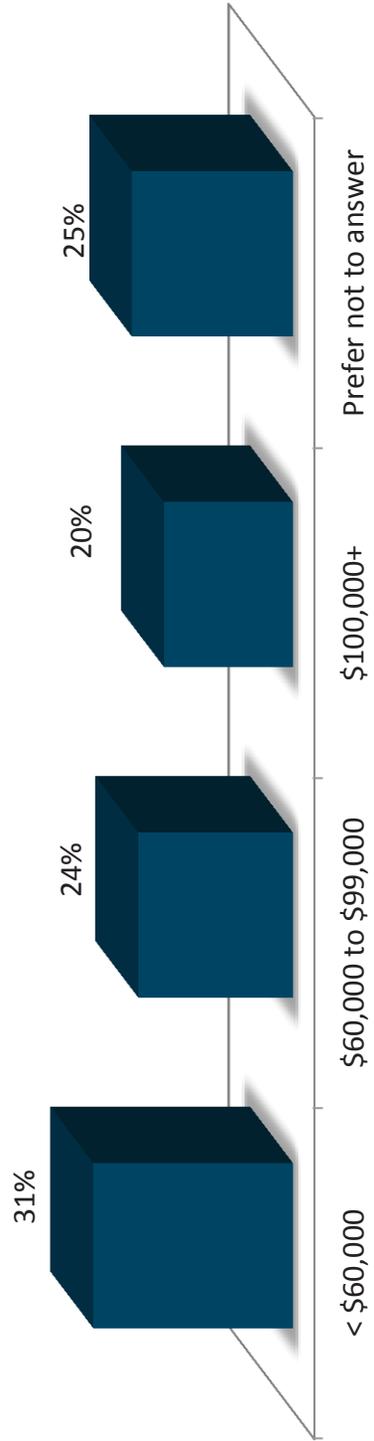
Age?



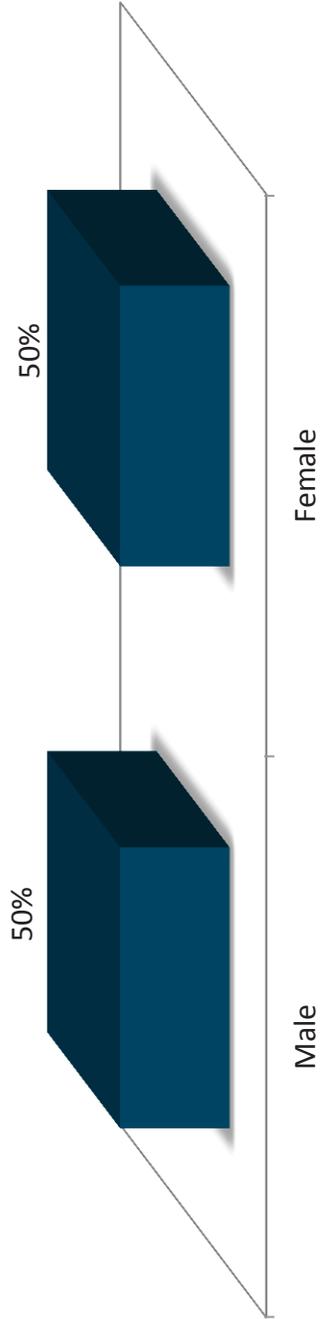
Region?



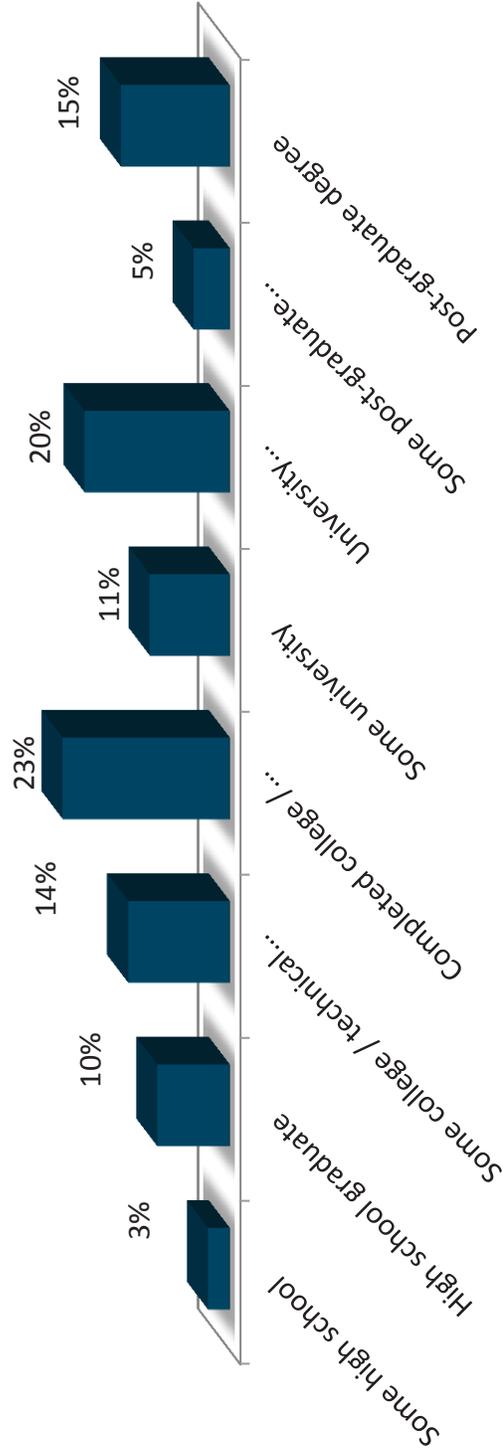
Income?



Gender?



Education?





Customer Emergency Fund Application

Appendix F

Summary Results from Focus Groups on CEF

MEMORANDUM

Public opinion research helps policymakers assess the public's expectations and potential response to new proposals or initiatives. To this end, BC Hydro commissioned two focus group research sessions which sought feedback and impressions regarding BC Hydro's proposal, as requested by the BC Utilities Commission, for the creation of a *Crisis Intervention Fund* (the Fund). Conceptually and perhaps most simplistically, the Fund would provide support to residential customers who are unable to pay their electricity bills.

Maple Leaf Strategies was engaged by BC Hydro as part of its efforts to understand the best way to design, develop, and implement the Customer Emergency Fund.

The two focus groups were conducted on March 16, 2017 with BC Hydro residential customers (eighteen participants in total). The focus group participants reflected a representative and demographically balanced mixture of BC Hydro residential customers who had the primary responsibility of paying their household's monthly BC Hydro bill. The screener used to evaluate participants' participation in the focus group research is in Attachment 1.

Both focus groups began with a paper exercise asking participants to indicate their level of support for the following proposal regarding the Fund:

To help any residential customer in BC who find themselves in a crisis situation and are struggling to pay their outstanding electricity bill and are being faced with having their electricity disconnected, the proposal is to add up to 25 cents to your monthly electricity bill. This addition of up to 25 cents will be held in a fund that can be accessed by residential customers in crisis.

For example, an individual may have had a job and then became ill and are not able to work while going through medical treatment – they are experiencing a crisis situation and may be having trouble making ends meet – including struggling to keep up with their BC Hydro bill.

While focus groups do not provide quantitative direction, participant position tallies provided a basis for discussion of support versus nonsupport for the proposed program. The participant paper exercise choices included: (1) This is something I totally support, (2) I could support this but need to know more about it, (3) I am not sure how I feel about it, and (4) This is something I am totally against. Almost three-quarters (72%) felt they could support the program but needed to know more about it, or were not sure how to feel; 11% were totally supportive, and 17% were "totally against" the proposal. This measure is consistent with the nature and feedback received through the discussion from participants. A copy of the paper exercise is in Attachment 2.

Participants were then asked to discuss their support level, the general context and considerations for the proposal and program design suggestions.

General context

In terms of context, there is agreement and support for the notion that there should be some form of assistance to help those in need. Affordability (more acutely housing affordability) in the Lower Mainland is considered a major and systemic issue and was referenced without prompting, as it related to home ownership and rentals. BC Hydro bills were considered to be contextually small (e.g., some were aware with little or no prompting that rates in BC are lower compared to other utilities and electricity rates in jurisdictions like Ontario).

First impression

Overall, at first consideration, support could largely be classified as supportive to the overall goal but more needs to be known. A relatively smaller number of participants offered a position of non-support for the proposal.

In terms of support, considerations around support appeared to be bifurcated by the participant's degree of closeness to accessing the Fund. Those who did not see themselves or people close to them as requiring the Fund in the near future, were among those whose initial impressions could be classified as leaning supportive but were skeptical. For these supporters, outstanding areas that required greater understanding before supportive could be granted included understanding: (1) the criteria for someone to qualify, (2) the need for funds from rate payers (rather than drawn from current funds) and (3) the administrative structure for the program (third-party fiscal management of the Fund was a strong draw for some of these supporters).

Among those that were supportive of the Fund and articulated that they or someone they knew may need to access the assistance in the near future, there was a desire to understand more concretely how it might be easily accessible if they or someone they knew needed to access it (i.e., how any barriers such as housing the Fund outside BC Hydro might be removed) and whether the Fund would actually be available in a time of need. Some examples of scenarios that were raised in discussion around qualification and implementation of the Fund included:

- *“Terminally ill? Long-term disability, short-term?”*
- *“If BC Hydro is so concerned about it, why don’t they cover it? It should come from their existing revenues.”*
- *“It’s a huge program. It will cost money. There will be more staff, and audit to administer the program.”*
- *“For us, it’s \$3 per year, but overall a lot. We want more details.”*

Positions of non-support (and some concerns raised by those who were supportive) were largely underpinned by a lack of understanding regarding the scope of the issue. While overall BC Hydro had positive to neutral brand impressions, those with negative tendencies to the Fund challenged how the Crown Corporation may use the Fund or how the purpose may have mandate creep, including addressing what some participants felt was a debt problem. Overall, those challenging the Fund's concept, and for some participants who were open to the concept, there was a desire for BC Hydro to remain focused on its perceived core function. From their perspective, this is to generate electricity for the province rather than operate as a charity or provide social assistance to those in need. Moreover, concerns that creating a program of this nature will encourage or create a precedent for other utilities or institutions to create programs that require fund contributions from rate payers. Some left the question open on whether a provincial government program might be able to fulfill the scope and mandate of the Fund proposal.

- *“Who is to say it isn’t going to increase. Hydro will get full rein. I pay enough taxes and I don’t want to be taxed one more cent.”*
- *“There must be a crisis situation at BC Hydro. How big is the problem?”*
- *“My concern comes from context. How are we defining crisis and why can’t they pay their bills? Are they using too much electricity so they can’t pay? If they are being sloppy, would there be an element of the program to teach them how to lower their bills?”*
- *“There is probably criteria for people who need short term financial assistance. But what do we do for people who can’t afford it over the long term? What do we do for those people?”*
- *“Employment insurance programs for all kinds of reasons. I don’t want Hydro telling me what to do. There are other mechanisms. It should be a provincial system, like welfare.”*
- *“It is not going to be a good excuse to increase the rate. It’s not the responsibility of BC Hydro to be a charity.” “There is a tool already in place. Social services will pay after some time.”*
- *“[BC Hydro] It’s not a charity. We should have our choice to give money. We could give it to the United Way. Hydro is not an association to give money to. In the end, you have no control over where the money is going. I can give more money, they can spend it on BC Hydro bills and other bills.”*

Of note, the focus group discussions suggest that the amount (up to 25 cents per month) had little bearing on either the supportive or unsupportive positions. While the relatively small amount per month provided an accessibility to those who were supportive, as the amount was not deemed excessive or inconsequential, the larger questions asked by those who were supportive were outside the issue of cost per month, and more around function, administration and practical implementation of the Fund model. These elements include requiring additional background on program design criteria, administration and delivery mechanism.

Conclusion

While there is not strong opposition to the Fund amongst most participants, there is also not a pre-existing public opinion demand for a program. While the merits were deemed to be laudable to assist those in need, there were more questions around implementation and program delivery. If BC Hydro or the Regulator determined that such a program should be pursued, for the purposes of social marketing, there would be merit in framing the program in terms of a broader social protection. In the Lower Mainland, reference to “cost of living” would resonate from an opinion perspective, but it is unclear how this might impact commercial behavior which would also be dependent on the scope and controls within the Fund to avoid abuse. The amount of the contribution was not a main driving force of opinions around the concept, but those who were opposed took their position from a principles perspective, as opposed to a financial one. If a government entity or social service entity or foundation delivered such a program, it would likely resonate more strongly with perceptions among more affluent participants around the role and mandate of BC Hydro as a utility provider. However, those who are less affluent and may perceive themselves as potential clients of such a Fund would not prefer a third-party administration system and would instead seek for there to be expedited consideration, processing and resolution of their claim.

Attachment 1 – FOCUS GROUP SCREENER

BC HYDRO – FOCUS GROUP SCREENER

March 2017

Hello, my name is _____. I'm calling from _____. We're organizing a discussion group in the **LOCATION** area on **DATE** at **TIMES** to explore various opinions regarding electricity service and cost in BC.

About 10 people like you will be taking part, all of them randomly recruited just like you. For your time, you will receive a cash gift of \$75. But before we invite you to attend, we need to ask you a few questions to ensure that we get a good mix/variety of people. Your answers to these questions and your participation in the discussion groups are both voluntary and completely confidential and your answers will remain anonymous.

IF RESPONDENT IS CONCERNED:

Participation is voluntary and all your answers will be kept confidential and will be used for research purposes only. We are simply interested in hearing your opinions, no attempt will be made to sell you anything. The format is a "round table" discussion led by a research professional.

IF RESPONDENT ASKS ABOUT THE TOPIC OF THE GROUP:

You will be discussing opinions on cost and service of electricity in BC.

You don't need any specific knowledge – everything you need to know will be shared with you during the discussion, and you will be asked to share your opinions.

S1a. Are you 18 years of age or older?

- Yes [**SKIP TO S2**]
- No
- Don't know/Refused [**THANK AND TERMINATE**]

S1b. Can I speak to anyone else who lives at this residence and is 18 years of age or older?

- Yes [**REPEAT INTRODUCTION WITH NEW RESPONDENT & CONTINUE**]
- No eligible respondent resides in household [**THANK & TERMINATE**]
- No, eligible respondent is not available [**ARRANGE CALLBACK**]
- Don't know/Refused [**THANK AND TERMINATE**]

S2. Does anyone in your household work for... [**READ LIST**]

- A marketing research firm
- A newspaper, radio, or TV station (media)

- An advertising agency
- BC Hydro
- Fortis [**RECORD ONLY**]
- NONE OF THE ABOVE
- Don't know/Refused [**DO NOT READ**]

[IF “YES” TO ANY OF THE ABOVE OTHER THAN NONE OR FORTIS, THANK AND TERMINATE]

S3a. Are you the person in your household primarily responsible in your household for paying your monthly BC Hydro bill?

- Yes [**SKIP TO S4**]
- No
- We do not receive a bill from BC Hydro [**THANK AND TERMINATE**]
- Don't know/Refused [**THANK AND TERMINATE**]

S3b. Can I speak to the person who lives at this residence and primarily responsible in your household for paying your monthly BC Hydro bill?

- Yes [**REPEAT INTRODUCTION WITH NEW RESPONDENT & CONTINUE**]
- No, eligible respondent resides in household [**THANK & TERMINATE**]
- No, eligible respondent is not available [**ARRANGE CALLBACK**]
- Don't know/Refused [**THANK AND TERMINATE**]

S4. Gender [**AIM FOR 50:50**]

- Male
- Female
- Don't know/Refused

S5. Which of these categories includes your age? [**AIM FOR MIX OF AGE**]

- 18-34
- 35-44
- 45-54
- 55-64
- 65+
- Don't know/Refused [**THANK AND TERMINATE**]

S6. Have you ever participated in a focus group or in depth interview? [**AIM FOR AT LEAST HALF HAVE NEVER PARTICIPATED IN A FOCUS GROUP**]

- Yes
- No [**SKIP TO S8**]
- Don't know/Refused [**THANK AND TERMINATE**]

S7. How many months ago did you last participate in a focus group or in-depth interview?

- 7 months or more
- 6 months or less **[THANK AND TERMINATE]**

S8. How comfortable are you expressing your opinions in front of people you've just met?

Would you say you're...

- Very comfortable
- Fairly comfortable
- Not very comfortable **[THANK AND TERMINATE]**
- Not at all comfortable **[THANK AND TERMINATE]**
- Don't know/Refused **[THANK AND TERMINATE]**

S9. Could you please tell me what is the last level of education that you have completed? **[READ LIST]**

- Some high school
- Completed high school
- Some College/University
- Completed College/University
- Don't know/Refused

S10. Which of the following categories does your yearly total household income fall within?

- Under \$20,000
- \$20,000 to under \$39,999
- \$40,000 to under \$59,999
- \$60,000 to under \$79,999
- \$80,000 to under \$99,999
- \$100,000 to under \$149,000
- \$150,000+

S11. Do you own or rent your current home?

- Own
- Rent
- Live with someone rent free
- Don't know/Refused

S12. On average, how much do you pay for your monthly electricity bill from BC Hydro?

- Less than \$50
- Between \$50 and \$150
- More than \$150
- Don't know/Refused

S13. Which of the following best describes your employment situation? Are you... **[READ LIST]**
[ENSURE AT LEAST 6 PARTICIPANTS ARE WORKING FULL TIME]

- Employed full-time
- Employed part-time (-35HRS)
- Retired
- Currently not working
- Student
- Homemaker
- Other
- Don't know/Refused **[DO NOT READ - THANK AND TERMINATE]**

Wonderful, you qualify to participate. The session will be held on **DATE** at **TIME** at **ADDRESS**. The session will last no more than two hours in duration and you will need to arrive at least **15 minutes before** the start of the discussion.

I need to let you know that the discussion will be audio and video taped, to help us produce the report. The report will not mention any participants by name, and the tapes will be kept strictly confidential. You will be asked to sign a form giving your consent to be videotaped at the beginning of the session.

We are reserving this discussion time for you. So if for any reason you cannot attend, please call: **PHONE NUMBER**. We may be reviewing visual materials so if you wear glasses please bring them along. You should also bring a piece of identification such as your driver's license, in order to collect your \$75. And finally, don't forget to turn off your phone.

Attachment 2 - PAPER EXERCISE

Name: _____ Group Time: _____

Please indicate how you feel about the following proposal:

To help any residential customer in BC who find themselves in a crisis situation and are struggling to pay their outstanding electricity bill and are being faced with having their electricity disconnected, the proposal is to add up to 25 cents to your monthly electricity bill. This addition of up to 25 cents will be held in a fund that can be accessed by residential customers in crisis.

For example, an individual may have had a job and then became ill and are not able to work while going through medical treatment – they are experiencing a crisis situation and may be having trouble making ends meet – including struggling to keep up with their BC Hydro bill.

- This is something I totally support
- I could support this but need to know more about it
- I am not sure how I feel about it
- This is something I totally against

COMMENT SECTION

Customer Emergency Fund Application

Appendix G

LIAC Meeting Minutes

TYPE OF MEETING	Low Income Advisory Council – March 1, 2017
FACILITATOR	Shirley Siega, BCH
PARTICIPANTS	Linda Dong and Lloyd Guenther – Zone II Ratepayers Group; Fred Weisberg – NIA Ratepayers Group; Erin Pritchard and Michael Seaborn – BCPIAC
BC HYDRO ATTENDEES	Gordon Doyle, Daren Sanders, Shirley Siega
AGENDA	<ol style="list-style-type: none"> 1) Terms of Reference 2) Update on RDA Commitments 3) Crisis Intervention Fund 4) Reporting/Segmentation 5) Wrap Up/Next Steps

MEETING MINUTES																																					
ABBREVIATIONS	<table border="0"> <tr> <td>AR.....Aboriginal Relations</td> <td>kW..... Kilowatt</td> </tr> <tr> <td>BCH.....BC Hydro</td> <td>kWh..... Kilowatt hour</td> </tr> <tr> <td>BCPIAC ..BC Public Interest Advocacy Centre</td> <td>LILow Income</td> </tr> <tr> <td>BCUC..... BC Utilities Commission</td> <td>LIACLow Income Advisory Council</td> </tr> <tr> <td>CIFCrisis Intervention Fund</td> <td>MSDSIMinistry of Social Development & Social Innovation</td> </tr> <tr> <td>COS.....Cost of Service</td> <td>NIA..... Non Integrated Areas</td> </tr> <tr> <td>CRP..... Conservation Potential Review</td> <td>NSP.....Negotiated Settlement Process</td> </tr> <tr> <td>DSM..... Demand Side Management</td> <td>OEB.....Ontario Energy Board</td> </tr> <tr> <td>ECAP..... Energy Conservation Assistance Program</td> <td>RDA..... Rate Design Application</td> </tr> <tr> <td>ESK.....Energy Saving Kit</td> <td>REUS..... Residential End Use Survey</td> </tr> <tr> <td>GS.....General Service</td> <td>RIB..... Residential Inclining Block rate</td> </tr> <tr> <td>GWh..... Gigawatt hour</td> <td>RRA..... Revenue Requirement Application</td> </tr> <tr> <td>INAC..... Indigenous and Northern Affairs Canada</td> <td>SFD..... Single Family Dwelling</td> </tr> <tr> <td>IP Instalment Plan</td> <td>SMI..... Smart Meter Infrastructure</td> </tr> <tr> <td>IPP..... Independent Power Producers</td> <td>SRP..... Streamlined Review Process</td> </tr> <tr> <td>IRP..... Integrated Resource Plan</td> <td>TRAC Tenant Resource and Advisory Centre</td> </tr> <tr> <td>IRs..... Information Requests</td> <td>TRC..... Total Resource Cost</td> </tr> <tr> <td>IT..... Information Technology</td> <td></td> </tr> </table>	AR.....Aboriginal Relations	kW..... Kilowatt	BCH.....BC Hydro	kWh..... Kilowatt hour	BCPIAC ..BC Public Interest Advocacy Centre	LILow Income	BCUC..... BC Utilities Commission	LIACLow Income Advisory Council	CIFCrisis Intervention Fund	MSDSIMinistry of Social Development & Social Innovation	COS.....Cost of Service	NIA..... Non Integrated Areas	CRP..... Conservation Potential Review	NSP.....Negotiated Settlement Process	DSM..... Demand Side Management	OEB.....Ontario Energy Board	ECAP..... Energy Conservation Assistance Program	RDA..... Rate Design Application	ESK.....Energy Saving Kit	REUS..... Residential End Use Survey	GS.....General Service	RIB..... Residential Inclining Block rate	GWh..... Gigawatt hour	RRA..... Revenue Requirement Application	INAC..... Indigenous and Northern Affairs Canada	SFD..... Single Family Dwelling	IP Instalment Plan	SMI..... Smart Meter Infrastructure	IPP..... Independent Power Producers	SRP..... Streamlined Review Process	IRP..... Integrated Resource Plan	TRAC Tenant Resource and Advisory Centre	IRs..... Information Requests	TRC..... Total Resource Cost	IT..... Information Technology	
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Introduction

Daren Sanders

Setting up the LIAC is very useful for BCH. We don't have communications with potential stakeholders that would be impacted by changes we make to our business rules.

AGENDA ITEM – LIAC TERMS OF REFERENCE	DISCUSSION
	<p>Fortis's collection practices are different than BCH's. The value to us is really working within BCH.</p> <p>Idea is to keep the group quite small to start.</p> <p>Re: Background - How does this impact Fortis - usually these types of initiatives are provincial in nature.</p> <p>Purpose is to have two way communications. We have some flexibility in how we interpret the Tariff. There are also items and changes we can make without going to the BCUC.</p> <p>BCH wants to stay away from specific customer issues – all in support.</p>
The mandate seems very specific to business practices and should say something about a broader purpose.	Wording changes were made with the LIAC feedback to encompass a broader purpose.
Add wording around continuing review.	Noted and changed.
Mention of conservation.	Noted and changed.

AGENDA ITEM – LIAC TERMS OF REFERENCE	DISCUSSION
Incorporate feedback loop.	Changes incorporated into charter.
Re. 10a and 10b – we are getting really specific.	Changed language. We will explain if/when we do not proceed with an idea.
We don't want a huge team. Also thinking Immigration Services to join.	All agreed 12 participants is the maximum. We would like one residential tenancy – TRAC. Also Disability Alliance BC. ACTION PIAC – Follow up on Anti-Poverty and Seniors - will talk to client organizations about other groups. Agree with not including more government agencies (other than MSDSI).
Request to add note about scheduling meetings for year.	Meetings are expected to be quarterly – except when there is something that requires a shorter timeline (e.g., Crisis Intervention Fund (CIF)).
Funding – how do we want to address this? Don't get paid twice.	Like to take it on a case by case basis. Teleconferencing may make a lot of sense. Could be questionable for people in some communities given limited internet access.
Question about Zone 2 participation.	Kwadacha – may be represented via teleconferencing.
Update on RDA Commitments	
Daren - Winter disconnection moratorium – first out of gate really good year to test.	
AGENDA ITEM – RDA COMMITMENTS	DISCUSSION
Is the winter payment plan related to winter disconnection moratorium?	No not related. Consistent with the longer payment arrangements we were already putting in place. Longer IP is in place (for customers who self-declare as having hardship).
Medical Disconnections.	Volumes very low as expected.
	Key is to call in to make arrangements. Can be intimidating for some customers.
	In person customer service desks. Prince George live end of April, Dunsmuir and Edmonds live now. In process of building three test kiosks e.g., via skype. Also potentially in Surrey, Victoria or Nanaimo. Fort St John is also a future possibility.
	We can't force INAC to have the same arrangement as MSDSI (re. directly paying for accounts).
AGENDA ITEM – CRISIS INTERVENTION FUND	DISCUSSION
	For MSDSI funding a client must show imminent threat to health – in order to receive emergency support. Our programs must complement what the other programs are in BC. Emergency funding is quite tight.
	ACTION Gord - Need to investigate whether criteria such as 10% of income spent on energy (or another such threshold) being defined as “energy poor” would be discriminatory. This is a critical element – we need to be careful that we don't pick criteria which results in the same impact as income thresholds.
	Could do a series of points for intake organization or more holistic objectives.

AGENDA ITEM – CRISIS INTERVENTION FUND	DISCUSSION
	<p>Individuals must apply for other grants and the BCH grant should only be paid after they have exhausted other payment plan options.</p> <p>What does income based mean? For example last year may look okay but this year is not good. So many dilemmas with income.</p> <p>Change in circumstances – beyond person’s control with economic impact – relative to the context of a person’s entire circumstance. Should be scalable.</p> <p>Impacts all of BCH’s residential customers. Re. Fortis – BCH is building this to be scalable.</p>
<p>Concern that BCH funds will displace other funds so total going to people who need it does not get any higher (than it is currently).</p> <p>For example, homeless prevention funds are gone within a few days of it opening.</p>	<p>Group agreed that this would not be a risk given the amount of other funds in market (i.e., very little).</p>
	<p>Length of pilot – two year pilot. This timing is very important so we can see impact of CIF on bad debt.</p>
	<p>Add some soft benefits such as better customer experience.</p> <p>The BCUC can adjudicate on BCH costs not the costs to other agencies.</p>
	<p>Re. Eligibility</p> <ul style="list-style-type: none"> • Energy poor household (electricity cost is > a set percentage of household income) • Also indicate other avenues must be exhausted. • Process should trigger an action – arrange participation. <p>Actions now – shrink the steps – if customer is eligible for an ESK then get the kit out right away.</p>
<p>Contents of three part notification.</p>	<p>This is what the contents of a three part notification should have:</p> <ol style="list-style-type: none"> 1. The purpose for collection (what and why; use to which it will be put). 2. The legal authority for the collection (not sure what that would be in this context; perhaps an agreement between BCH and the customer further to some statutorily dictated relationship; so, the <i>Hydro and Power Authority Act</i>; the <i>Clean Energy Act</i>; the <i>Tariff, BCUC, Utilities Commission Act</i>). 3. The name and number of a BCH program-area person that can be contacted in the event that the subject of the personal information has questions about the collection of his/her personal info.
	<p>Target market size determination can be done with extrapolation of Ontario crisis fund results onto BC market.</p>
	<p>Eligibility – in itself creates privacy concerns. For example private information. Find the balance.</p> <p>There needs to be checks and balances in place that align with the level of risk.</p> <p>Audit of the process is part of evaluation – including where discretion is given - we will tweak in a permanent program.</p> <p>What are we going to have on file on how the agency – makes decision – we are the caretakers of customer money – we need to audit.</p>

AGENDA ITEM – CRISIS INTERVENTION FUND	DISCUSSION
How would we escalate?	<p>Who should have the ultimate say? BCH, BCUC, other? Awkward spot for BCH.</p> <p>Customer complaints could go to BCUC.</p> <p>Group discussion - If agency rejects not automatically responsibility for BCH to review – should go back to agency. Put it back to the decision maker.</p> <p>Clause in agreement with agency and customer re. non-partisan – up to agency for discretion.</p>
	<p>Implementation idea - to have one centralized agency - subsidiary would liaise with central agency.</p> <p>At intake we should ask participants “how did you hear about this program?”</p>
	<p>BCH would need to know if applicants received support in the past year and if they are the account holder. Binary – no discretion. Not reason but eligibility.</p> <p>Applicants can bring in their bills. Agency can have administrative rights on BCH accounts. (if permission has been granted by customer).</p>
	<p>Agency in case of First Nation would be the Band. Band could reach out to central agency – Band becomes one of the many agencies – then goes centrally to one place – one of the feeder agencies up to the deciding agency – this conceptually could work - will need to work with AR on this.</p> <p>Business Account Services (BAS) model has worked well for communicating with BCH.</p>

AGENDA ITEM – CRISIS INTERVENTION FUND	DISCUSSION
<p>How do we define success</p> <ul style="list-style-type: none"> o Customer o BCH o Agency o Regulatory o Shareholder 	<p>Anecdotal feedback from agencies – less disconnects, positive feedback.</p> <p>Number of disconnections.</p> <p>Look at both short term and longer term stats.</p> <p>How do you measure stress of situation being avoided.</p> <p>Individual stories have great impact.</p> <p>Part of consent customer gives is that of okay with giving agencies the approval to follow up with customers.</p> <p>Number of applications we get – and the pass ratio.</p> <p>Consistent application by agencies -- Agency satisfaction in working with BCH.</p> <p>Benefit Cost ratio – administrative cost – reasonable or lower. Ratepayers' perspective.</p> <p>Need to be creative in how we define success.</p> <p>Repeat – applications.</p> <p>Opportunities to leverage other opportunities – e.g., ESK and ECAP – e.g., that kit got out plus other services that the agency may provide.</p> <p>Other ratepayers may complain.</p> <p>Suggested message, “we want to reduce the number of disconnections; anyone of us could need assistance at some point”.</p> <p>Regional representation – geographical update.</p> <p>Customer satisfaction decreases/increases.</p> <p>Customer complaints related to CIF.</p> <p>We will get push back if negative news.</p> <p>Messaging to ratepayers – re. acceptance. Messaging about what it is and why it is.</p> <p>Big issue is if a customer should have received the grant and did not.</p> <p>Program is overly complicated/burdensome so participation is low.</p> <p>Total elapsed time from first request to approval (and funds transferred to customer account).</p> <p>May be ratepayer push back – some may say it is a provincial responsibility and they did not get the opportunity to provide input.</p> <p>For line item on bill – make it clear as to what it is.</p>
	<p>Could have BCUC staff come to LIAC group – and listen to process – the more people that understand the issues, the less contentious.</p>
AGENDA ITEM - SEGMENTATION ANALYSIS	DISCUSSION
<p>Segmentation Benefits - Payment patterns more clear – and characteristics of non-payment and predictors of non-payment – and disconnection rates for LI.</p>	<p>It is a privacy issue.</p> <p>No access and can't maintain data.</p> <p>In the absence of the data BCH may need to inform the BCUC that the information required to produce the report is not available.</p> <p>Need to obtain input from Privacy first and update next meeting.</p> <p>Information will be used to determine cost/benefit.</p> <p>Need to know what we will do with the data. How is it useful? Where does this get us? We don't have tools to make LI customers not LI.</p>

SUMMARY

TYPE OF MEETING	Low Income Advisory Council – April 21, 2017
FACILITATOR	Shirley Siega, BCH
PARTICIPANTS	Linda Dong, and Lloyd Guenther - Zone II Ratepayers; Fred Weisberg – NIA Ratepayers; Erin Pritchard – BC PIAC; Jean McDonald – INAC; Kelly Newhook – Together Against Poverty Society; Jane Dyson – Disability Alliance BC; Zuzana Modrovic – Tenant Resource & Advisory Centre; John Wynne – Council of Senior Citizens’ Organization
BC HYDRO ATTENDEES	Daren Sanders and Shirley Siega
ABSENT	Michael Seaborn – BC PIAC; Joyce Fraser – Tk'emlups Te Secwepemc First Nations; Najib Raie – Immigration Services
AGENDA	1) Focus group results and Ontario research results 2) Draft Proposal – review for input

MEETING MINUTES

ABBREVIATIONS	BCH..... BC Hydro BCPIAC.. BC Public Interest Advocacy Centre BCUC..... BC Utilities Commission CIF..... Crisis Intervention Fund COS.....Cost of Service CRP.....Conservation Potential Review DSM Demand Side Management ECAP Energy Conservation Assistance Program ESK Energy Saving Kit GS.....General Service GWh..... Gigawatt hour INAC Indigenous and Northern Affairs Canada IP Instalment Plan IPP.....Independent Power Producers IRP..... Integrated Resource Plan IRs..... Information Requests IT.....Information Technology	kW.....Kilowatt kWh.....Kilowatt hour LI Low Income LIACLow Income Advisory Council MSDSI....Ministry of Social Development & Social Innovation NIA.....Non Integrated Areas NSP.....Negotiated Settlement Process OEB.....Ontario Energy Board RDA..... Rate Design Application REUS..... Residential End Use Survey RIB..... Residential Inclining Block rate RRA..... Revenue Requirement Application SFD..... Single Family Dwelling SMI..... Smart Meter Infrastructure SRP..... Streamlined Review Process TRAC Tenant Resource and Advisory Centre TRC.....Total Resource Cost
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Introduction

Daren Sanders

AGENDA ITEM	DISCUSSION
CIF - General	
Would the CIF be available to customers of other utilities such as FortisBC or City of New Westminster?	No. The pilot is being contemplated only for BCH customers. However, the ability to expand the program to customers of other utilities is a factor to be considered in program design.
Focus groups	
What was the make-up of the focus groups?	There were two groups of eight, picked randomly from residential customers in the Lower Mainland. BCH understands that this is not necessarily representative of all customer segments, including customers located elsewhere in the province. However, the groups were useful in providing a qualitative view of how a CIF program could be received, and so provided some understanding of how program messaging and marketing should be approached. Some are skeptical – some oppose on principle.

SUMMARY

AGENDA ITEM	DISCUSSION
Commentary on level of skepticism	<p>It isn't surprising that some participants would be skeptical. Some people will oppose the idea purely on principle.</p> <p>The two focus groups responded slightly differently to some of the questions, in part because one group had an individual that shared personal experiences and made the issue more real.</p>
Business model	<p>There is generally a lack of trust for government/crown corporations for this type of issue. Community agencies have a better reach at getting to customers in need. The program needs transparency and BCH will have an obligation to ensure the public is informed.</p>
Ontario site visits	
Clarity of criteria for agencies to apply	<p>Discussed how making criteria more specific reduces calls to screen potential applicants and can also make calls shorter. This reduces the cost of program administration and increases the amounts that can be directed to help those in need.</p> <p>More specific criteria also allows for consistent adjudication.</p>
DSM	<p>It was noted that at the time of a crisis, many customers visiting advocates are concerned primarily about immediate issues and less about the longer term value of energy conservation. It also takes time for the agencies to explain, and may not be as relevant in social housing or other rentals.</p> <p>There was some agreement that conservation can help reduce bills in the longer term, though the amount of potential savings isn't enough to address the underlying poverty issues.</p>
Impacts of CIF on other grant programs	<p>BCH will need to work with MSDSI to make sure a grant doesn't affect a customer's ability to access its crisis supplement programs.</p> <p>While the CIF shouldn't be extremely difficult to access (i.e., as a fund only of last resort), the criteria will also need to make sure that the fund isn't depleted by customers eligible for other supplements.</p> <p>INAC noted it also has hardship assistance programs that BCH should coordinate with.</p>
Delivery Models	
Option 1 – delivered solely by BCH	<p>This delivery model was not supported.</p> <p>There was general agreement that BCH should not take on the role of application intake and adjudication. This is not BCH's core competency and it would take considerable education for call centre staff to be able to understand the issues.</p> <p>BCH doesn't have offices in each of the communities that would be capable of adjudicating applications. A centralized (phone only) process wouldn't be effective.</p>
Option 2 – BCH call centre with community agencies	<p>This delivery model could work but was not preferred.</p> <p>It would be possible for BCH's call centre to perform primary screening and direct customers to local agencies. However, as BCH would only manage the CIF, it would limit the ability to refer to other types of programs, as would be possible through other types of agencies.</p> <p>This model would also make BCH responsible for managing appeals for applications rejected by the community agencies. This is not ideal because it is not arm's length.</p> <p>Any model with community agencies would need to have defined service levels e.g., time to review the application. The account would not be disconnected while the application was being reviewed. BCH indicated it understands that in Ontario disconnection is delayed for 21 days for applications being adjudicated.</p>

SUMMARY

AGENDA ITEM	DISCUSSION
Option 3 – Third party working with community agencies	<p>This delivery model was preferred.</p> <p>BC211 was recommended as an agency that may be suitable to be the central contact centre to handle referrals to the community organizations.</p> <p>One downside is that the administrator wouldn't be under the jurisdiction of the BCUC. This adds complexity to regulatory processes, as well as how the program could adapt and improve during and after the pilot.</p> <p>It was noted that if a rejected application is appealed, it may be awkward if the appeal is managed by the agency itself. It was suggested that perhaps an appeals committee could be corrected. BCH noted that the appeal would need to be resolved within an acceptable period because its disconnection processes can't be postponed indefinitely.</p>
Creation of the Network	<p>The selection of the community agencies should consider an evaluation of capacity as well as cost. Some agencies won't have the resources available to support delivery requirements. It was also noted that being an advocate is different than being an adjudicator of applications.</p> <p>Several participants indicated that not for profit agencies are familiar with responding to Requests for Proposals.</p> <p>United Way, Vancouver Foundation, and Victoria Foundation were noted as examples of umbrella organizations that would have the capacity to develop and issue a Request for Proposals, and select the local agencies. However, it was also noted that BCH could hire a contractor with expertise in not for profit organizations.</p> <p>BCH acknowledged that several LIAC members would be potential candidates to act as intake agencies, and those steps may need to be taken to ensure there are no conflicts for LIAC members in the selection process.</p>
Regulatory Process	<p>Expedited approval should be requested. Ideally the pilot should be in effect to help with the 2017/18 winter bills.</p> <p>The length of the pilot was discussed. It was suggested that a three year pilot may be most practical. The first six months after launch will not provide much data because word of the program will still be spreading.</p> <p>The application will need to clarify the applicability of the CIF to arrears that were incurred prior to Commission approval.</p>

SUMMARY

AGENDA ITEM	DISCUSSION
Criteria	<p>The list of draft criteria was reviewed.</p> <p>Clarification of eligibility for the CIF is required for a customer that is denied service at the time of application based on having a prior account in arrears.</p> <p>There was a discussion of the “temporary” nature of a financial crisis. Some participants noted that a threshold needed to be established to ensure the fund could be targeted to a “crisis” rather than being an income-based credit.</p> <p>BCH’s draft suggested that the “life event” had to have been within the past six months. It was discussed that one year may be more appropriate because it can take longer than six months to exhaust savings.</p> <p>It was suggested that eligibility for one grant within 12 months should be on a rolling basis and not calendar years.</p> <p>Several participants noted that incarceration or rehab should be considered as “life events” and not preclude participation. Similarly, it was suggested that “termination with cause” should not exclude a potential applicant on the basis that it can be difficult for a terminated employee to argue against this categorization of termination.</p> <p>The risk of fraudulent applications was discussed. The general position of the participants was that fraud is unlikely because it would be a lot of work to obtain \$500. However, participants acknowledge BCH’s fiduciary responsibility for its customers’ contributions. One participant suggested that it may be sufficient for the application to include a declaration of the customer’s condition, in conjunction with noting the potential to audit the applicant.</p>

SUMMARY

TYPE OF MEETING	Low Income Advisory Council – May 25, 2017
FACILITATOR	Shirley Siega, BCH
PARTICIPANTS	Linda Dong - Zone II Ratepayers; Fred Weisberg – NIA Ratepayers; Erin Pritchard & Michael Seaborn – BCPIAC; Kelly Newhook & Caitlin Wright – Together Against Poverty Society; Jane Dyson – Disability Alliance BC; John Wynne – Council of Senior Citizens’ Organization, Dana Jensen – MSDSI
BC HYDRO ATTENDEES	Daren Sanders and Shirley Siega
ABSENT	Joyce Fraser Tk’emlups Te Secwepemc First Nations, Najib Raie – Immigration Services, Tenant Resource & Advisory Centre, Jean McDonald – INAC
AGENDA	1) Welcome to new members: Dana Jensen and Caitlin Wright 2) Update re: Business Rules now on bchydro.com 3) Crisis Intervention Fund 4) Segmentation Analysis

MEETING MINUTES		
ABBREVIATIONS	BCH..... BC Hydro BCPIAC.. BC Public Interest Advocacy Centre BCOAPO. BC Old Age Pensioners’ Organization BCUC..... BC Utilities Commission CIF..... Crisis Intervention Fund COS.....Cost of Service CRP.....Conservation Potential Review DSM Demand Side Management ECAP Energy Conservation Assistance Program ESK Energy Saving Kit GS.....General Service GWh..... Gigawatt hour INAC Indigenous and Northern Affairs Canada IP Instalment Plan IPP..... Independent Power Producers IRP..... Integrated Resource Plan IRs..... Information Requests IT..... Information Technology	kW..... Kilowatt kWh..... Kilowatt hour LI Low Income LIAC Low Income Advisory Council MSDSI.....Ministry of Social Development & Social Innovation NIA.....Non Integrated Areas NSP.....Negotiated Settlement Process OEB.....Ontario Energy Board RDA..... Rate Design Application REUS..... Residential End Use Survey RIB..... Residential Inclining Block rate RRA..... Revenue Requirement Application SFD..... Single Family Dwelling SMI..... Smart Meter Infrastructure SRP..... Streamlined Review Process TAPS..... Together Against Poverty Society TRAC Tenant Resource and Advisory Centre TRC.....Total Resource Cost
	AGENDA ITEM –	DISCUSSION
	1) Welcome to new members	Welcome to Caitlin Wright – TAPS and Dana Jensen – MSDSI
	2) Update re: Business Rules now on bchydro.com	The link is www.bchydro.com/customerservicerules and the group is welcome to provide feedback. We will continue to update these business rules on an ongoing basis.
	3) Crisis Intervention Fund – Delivery Model	Discussion and concern was raised around the concept of existing government agencies providing a front end interface to the CIF. The group is more comfortable with a third party providing the interface and requested that BCH meet with the Law Foundation. Note: this meeting took place on May 31. Re: BCH Adjudication – concern was raised around why BCH would adjudicate the CIF. After discussion some agreed that as an interim for the pilot it would be acceptable. The benefit is that it gives very close visibility of the CIF process and will help all parties learn from the pilot experience.
	4) CIF - Term of Pilot	It was deemed by many that the pilot should be three years versus two years. It is important to have enough time to measure the impact of the pilot in order to fairly evaluate the benefits and costs. As a result it was agreed that BCH would propose a two year province wide pilot with the option of extending an additional year until the BCUC has made a decision on the program’s long term viability. This approach ensures fair and equitable treatment of both customers paying into the fund and receiving services from the pilot program. Furthermore, it ensures continuity of the program until a decision is made with

SUMMARY

AGENDA ITEM	DISCUSSION
5) CIF - Eligibility Criteria	<p>regards to the CIF becoming permanent.</p> <p>Some adjustments to the eligibility criteria were made – this is where the group landed.</p> <p>Applicants must:</p> <ul style="list-style-type: none"> • Be the BCH residential account holder, or authorized representative; and • Consent to having the Agent review their application for eligibility; and • Have a BCH account at risk, in arrears and/or under threat of disconnection; overdue balances at previous addresses – to be clarified; and • Have an account balance of less than \$1000; and • Reside at the address for which there are arrears; and • Be experiencing a financial crisis; and • Have experienced a life event, within the last 12 months (rolling), that has contributed to temporary financial crisis for the applicant: examples include – being faced with an unexpected living expense, layoff, divorce, death, medical emergency or condition, incarceration, and re-hab; and • Have exhausted all material “non-negative options ” (ex. income, liquid assets, other financial assistance programs); and • Have demonstrated prior attempt to pay the bill; and • Not have been issued a CIF grant within the past year; and • Complete a CIF application form; and • Be willing and able to provide, upon request, documentation that supports the information they have provided in their application; and • Agree to BCH's Terms and Conditions for privacy, rights, auditing, evaluation; and • Consent to be referred to a conservation program, or opt out. <p>The group did not reach consensus on the criteria, particularly regarding the definition of a life event or how recently it must have occurred.</p>

SUMMARY

AGENDA ITEM	DISCUSSION
6) CIF - Application Process	<p>The group would like to see customers who are on income tested programs (noted below) be able to bypass a part of the application that pertains to their financial situation. This recommendation has been incorporated into the draft application forms. The list of income tested programs is as follows:</p> <ul style="list-style-type: none"> • Guaranteed income supplement under the <i>Old Age Security Act</i> (Canada); • Allowance under the <i>Old Age Security Act</i> (Canada) for persons aged 60 to 64 with spouses or common-law partners who receive a pension under that Act and are eligible for a guaranteed income supplement; • Survivor's allowance under the <i>Old Age Security Act</i> (Canada); • Disability benefits under the Canada Pension Plan (Canada); • National Child Benefit Supplement; • Shelter aid for elderly renters under the <i>Shelter Aid for Elderly Renters Act</i>; • Income assistance for persons with persistent multiple barriers to employment under the <i>Employment and Assistance Act</i>; • Provincial senior's supplement under the <i>Employment and Assistance Act</i>; • Income assistance under the <i>Employment and Assistance Act</i>; • Hardship assistance under the <i>Employment and Assistance Act</i>; • Disability assistance under the <i>Employment and Assistance for Persons with Disabilities Act</i>; • Rental assistance provided by the British Columbia Housing Management Commission; • Recipients of social assistance on reserve; • Leisure Access Program (Vancouver) and equivalent programs in other municipalities (also income tested) http://vancouver.ca/parks-recreation-culture/leisure-access-card.aspx
7) Segmentation Analysis	<p>In its Decision and Order No. G-5-17 dated January 20, 2017 regarding BCH's 2015 Rate Design Application, the Commission directed BCH to:</p> <p>"Provide an analysis of the costs and benefits associated with BCOAPO's customer segmentation analysis and data collection and reporting within six months of the establishment of the low income advisory group."</p> <p>Action: BCPIAC will consider if its RDA request for low income reporting is still necessary.</p>
8) Next meeting	Next meeting will be in early September 2017

Customer Emergency Fund Application

Appendix H

Summary of Emergency Social Assistance Programs for B.C. Residents in Hardship

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1	Ministry of Social Development and Social Innovation (MSDSI) and BC Employment and Assistance Office (BCEA) - Hardship Assistance Program	1
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1 Ministry of Social Development and Social Innovation (MSDSI) and BC Employment and Assistance Office (BCEA) - Hardship Assistance Program

The BCEA's Hardship Assistance program is available to meet the essential needs of residents in the province who are not eligible for income or disability assistance and have proven that all other funding sources have been exhausted. It is issued as a loan for only one month at a time, and eligibility must be re-established every month.

The program is delivered by the BCEA, and application is made through that office.

Applicable circumstances include:

- Awaiting Employment Insurance or other income;
- Assets in excess, where assets are not immediately available;
- Strike or lockout;
- Immediate need but have not undertaken the three to five-week work search requirement for receiving social assistance; and
- Insufficient identification to qualify for income assistance.

The amount of the loan paid out is calculated as the maximum amount to meet basic needs, approximately \$600 to \$1500 per month depending on the family size and circumstances. A cheque is issued to the loan recipient. The Ministry prefers direct deposit.

Where the loan recipient is already receiving support from MSDSI, \$20 is deducted each month off their regular support cheque from the MSDSI until the loan is paid. In some cases, the loan may be forgiven.

Eligibility is based on the applicable circumstances above and:

- BC Employment and Assistance Application requirements;
- Citizenship requirements;
- Requirements to pursue other sources of income or means of support for which they may be eligible;
- Limits on income and assets.

Applicants/loan recipients in the family unit must also demonstrate they have:

- Applied for and accepted any other available income or assets, final pay cheques, holiday pay and holdbacks;
- Sought available help from other organizations, family and friends; and
- Exhausted all available income and assets.

These efforts must be documented.

Sources:

Ministry of Social Development and Social Innovation (MSDSI), BC Employment and Assistance (BCEA) - Hardship Assistance,

http://redbookonline.bc211.ca/service/9508839_9508839/bc_employment_and_assistance_bcea_hardship_assistance, accessed February 2017.

Phone call to Ministry General Enquiry Line (1-866-866-0800)

Ministry of Social Development and Social Innovation (MSDSI), BCEA Policy & Procedure Manual, Hardship Assistance,

<http://www2.gov.bc.ca/gov/content/governments/policies-for-government/bcea-policy-and-procedure-manual>, accessed February 2017.

Legal Services Society of BC: *Your Welfare Rights: A Guide to BC Employment and Assistance*: <http://www.lss.bc.ca/assets/inserts/yourwelfareinsert.pdf>.

2 MSDSI and BCEA - Extra Assistance - Crisis Supplement

The BCEA's Extra Assistance - Crisis Supplement program provides a one-time grant to cover costs of an unexpected, emergency need that could affect the health of BC Employment and Assistance existing clients or their family, or the safety of a child. Services are available to eligible BC Employment and Assistance clients.

The program is delivered by the BCEA, through an application at the BCEA.

Grant funds may be used for utility costs if there is the potential for a utility disconnection, provided the Ministry believes a child could be removed or safety of the family is compromised. Grants are limited to twice the family's regular monthly assistance payment per year. Grants may go over the maximum for essential utilities. For shelter, grants are restricted to the actual cost up to the maximum shelter allowance. A cheque or direct deposit is issued to the individual.

In order to be eligible, the family unit must be eligible for income assistance, disability assistance or hardship assistance, and the following factors must also apply:

- Family requires the supplement to meet an unexpected expense or obtain an item unexpectedly needed;
- Family cannot meet the expense because there are no other resources available; and
- Failure to meet the expense or obtain the item will result in imminent danger to the physical health of any person in the family unit or removal of a child under the *Child, Family and Community Services Act*.

Sources:

Legal Services Society of BC: *Your Welfare Rights: A Guide to BC Employment and Assistance*: <http://www.lss.bc.ca/assets/inserts/yourwelfareinsert.pdf>.

Ministry of Social Development and Social Innovation (MSDSI), BCEA Policy & Procedure Manual, Hardship Assistance, <http://www2.gov.bc.ca/gov/content/governments/policies-for-government/bcea-policy-and-procedure-manual>, accessed February 2017.

Ministry of Social Development and Social Innovation (MSDSI), BCEA Policy & Procedure Manual, Hardship Assistance, General Supplements and Programs Rate Table, <http://www2.gov.bc.ca/gov/content/governments/policies-for-government/bcea-policy-and-procedure-manual/bc-employment-and-assistance-rate-tables/general-supplements-and-programs-rate-table>, accessed February 2017.

3 Government of Canada - Aboriginal Affairs and Northern Development Canada: Hardship Assistance

The Government of Canada, the Aboriginal Affairs and Northern Development Canada has a Hardship Assistance program, which provides hardship assistance to those living on reserves. It is available to meet the essential needs of those not eligible for other social assistance, who will suffer undue hardship (such as hunger or eviction) without some financial help because they can't get other benefits. It is meant to be short-term assistance, in most cases no more than three months in a row.

Applications are made through an Indian Band's social development worker.

The amount of assistance provided depends on the family size and circumstances. In 2013, assistance averaged between \$600 and \$1500 per month. Funds are issued by cheque.

To be eligible, the applicant must:

- Be unable to access other monthly benefits;
- Live on reserve;
- Have no other source of money; and
- Be facing undue hardship without financial assistance.

Sources:

Aboriginal Legal Aid in BC,
<http://aboriginal.legalaid.bc.ca/benefits/socialAssistance.php#other>, accessed February 2017.

4 Mennonite Central Committee: Fraser Valley Rent Assistance Project

The Mennonite Central Committee (**MCC**), Fraser Valley Rent Assistance Project provides a one-time emergency loan or grant for individuals and families living in the Fraser Valley who are at risk of losing their home. The assistance is in the form of a loan, which can be used to pay rent or overdue rent, security deposits, or utility bills. The Project also teaches skills for money management and knowledge for rebuilding or establishing a credit rating.

The MCC delivers the Project and uses Community Partners for referrals, such as Mission Community Services Center, Abbotsford Community Services Center, and Agassiz-Harrison Community Services.

A maximum individual loan of \$400 or a maximum family loan of \$600 can be provided. A cheque is issued to the creditor.

The loan includes terms such as: interest on the loan will be charged but will be repaid once the loan is paid off, the monthly repayment is over two years, and the loan recipient must participate in financial literacy skills workshops.

To be eligible, the applicant must be low income and facing crisis (determined on case-by-case basis).

Sources:

BC211: The Mennonite Central Committee (MCC): Fraser Valley Rent Assistance Project,

http://redbookonline.bc211.ca/service/9506879_9506879/fraser_valley_rent_assistance_project, accessed February 2017.

Phone conversation with Program Coordinator (1-888-622-6337)

Mennonite Central Committee (MCC): Fraser Valley Rent Assistance Project, <https://mcccanada.ca/learn/more/fraser-valley-rent-assistance-project>, accessed February 2017.

5 Vancouver Rent Bank

The Vancouver Rent Bank is a short term funding source that is available to families and individuals who live in the City of Vancouver, and are at risk of eviction or essential utility disconnection due to a temporary shortage of funds. The Vancouver Rent Bank can also provide a security deposit for a new residence if the current housing is deemed unsafe or unsustainable. Low income individuals are also provided tools to better manage their limited financial resources.

The program is delivered by the Network of Inner City Community Services Society (**NICCSS**), and is funded by the City of Vancouver, Vancouver Foundation, CKNW Orphans Fund, the Province of BC, and United Way of the Lower Mainland.

The assistance is in the form of a one-time, interest-free loan. A maximum individual loan of \$1,300 and maximum family loan of \$1,800 can be issued. Upon approval, a cheque is provided, written to the creditor (e.g., landlord, BC Hydro, FortisBC). Repayment of the loan is made monthly over a two year period.

To be eligible, an applicant must:

- Be 19 years of age or older;
- Be low income;
- Have a bank account or be on income assistance;
- Have two pieces of ID;
- Provide proof or confirmation of tenancy or housing;
- Not be in the process of bankruptcy;
- Have no un-discharged bankruptcies;
- Have a sincere reason for any delinquency in payments;
- Have, or will have, a consistent source of income;
- Not able to access any other source of funds or government assistance to meet the financial need;
- Not have housing costs that would exceed their ongoing ability to pay the rent;
- Be experiencing temporary financial crisis;
- Owe no more than two months' rent in arrears; and
- Have or will have long-term, safe housing.

Sources:

City of Vancouver, Vancouver Rent Bank,
<http://vancouver.ca/people-programs/financial-aid.aspx>, accessed February 2017.

Network of Inner City Community Services Society, Vancouver Rent Bank,
<http://www.niccss.ca/VRB>, accessed February 2017.

6 Sources Rent Bank

Sources Rent Bank provides short-term loans to families and individuals living in Surrey and White Rock who are at risk for home eviction due to a shortfall in a monthly rent payment, having utility arrears, needing damage deposit or other circumstance.

Sources Rent Bank is funded by donations from the Sources Foundation, Surrey Homelessness and Housing Society, United Way, Vancouver Foundation, Envision Financial, and VanCity. The program is delivered by Sources Community Centre – Newton.

A low-interest (prime + 1.5 per cent) loan is offered, with a repayment requirement of over two years. If the individual attends financial literacy workshops, the interest is returned to them. A maximum individual loan of \$1,200 and maximum family loan of \$1,500 can be issued, with some exceptions depending on circumstances. A cheque is written to the creditor.

To be eligible, an applicant must:

- Be 19 years of age or older;
- Be low income;
- Have a bank account;
- Have no un-discharged bankruptcies;

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- Have a sincere reason for any delinquency in loan payments;
 - Have, or will have, a consistent source of income;
 - Not have housing costs that would exceed their ongoing ability to pay the rent;
and
 - Currently reside or will reside in Surrey and White Rock at the rental property for which the loan is issued.

Sources:

Sources Community Centre, Sources Rent Bank, http://www.sourcesbc.ca/index.php?option=com_content&view=article&id=205&Itemid=215, accessed February 2017.

Sources Foundation, Sources Rent Bank, <http://sourcesfoundation.ca/rent-bank>, accessed February 2017.

Personal communication with Sources Rent Bank (604-596-2311).

7 Kamloops Rent Bank

The Kamloops Rent Bank provides emergency loans at a low-interest rate for people in the Kamloops area who are going to be evicted from their housing or cut-off from their utilities.

The program is funded by donations. Past donors included Interior Savings Community Investment Fund, the Kelson Group, United Way, and the Stollery Charitable Foundation Kamloops. The program is delivered by the Kamloops and District Elizabeth Fry Society.

A low-interest loan is issued and is typically repaid over two years. A maximum of \$1,000 (with some exceptions) can be issued. Upon approval, a cheque is provided, written to the creditor (e.g., landlord, BC Hydro, FortisBC).

To be eligible, an applicant must:

- Be 19 years of age or older;
- Be a low income wage earner;
- Have two pieces of ID;
- Have been in stable housing over one year;
- Have, or will have, a regular income that can be verified;
- Currently reside in Kamloops at a rental property for which the loan will be issued;
- Have a bank account;
- Not be able to access any other form of financial assistance; and
- Not currently be on income assistance or disability assistance.

Sources:

Kamloops and District Elizabeth Fry Society, Kamloops Rent Bank,
<http://www.kamloopsefry.com/programs-services/housing/kamloops-rent-bank/>,
accessed February 2017.

Personal communication: Rent Bank Administrator (250-374-2119)

Kamloops: The Daily News: Rent bank opens doors in February,
<http://www.kamloopsnews.ca/news/city-region/rent-bank-opens-doors-in-february-1.1239931>, January 14, 2013.

8 Chimo Community Services Seniors Rent Bank

The Chimo Community Seniors Rent Bank offers a source of funding to people aged 55 and older, living in Richmond, who are at risk of eviction or essential utility disconnection due to a temporary shortage of funds or financial crisis. Funding may also be available for a damage deposit or pet deposit, if the person is homeless or their current housing is unsafe or unsuitable.

The program is funded by a donation of \$5,000 from Dream Auction and is delivered by the Richmond Rental Connect, which is a resource to homeowners, landlords, and tenants.

The assistance is in the form of an interest-free loan, which must be repaid over six months. A minimum loan of \$100 for an individual and \$800 for a family can be issued. Loan payments are made directly to the applicant, except in circumstances where payment made directly to the applicant would adversely affect their existing benefits or source of income (i.e., individuals on social assistance).

To be eligible, an applicant must:

- Be 55 years of age or older;
- Be low income;
- Have a legal status in Canada;
- Have a bank account;
- Have two pieces of ID;
- Provide proof or confirmation of tenancy or housing;
- Not be in the process of bankruptcy;
- Have no un-discharged bankruptcies;
- Have a sincere reason for any delinquency in loan payments;

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- Have, or will have, a consistent source of income;
 - Not be able to access any other source of funds or government assistance to meet the financial need;
 - Not have cashable assets greater than \$4,000 (not including funds in a Registered Savings Plan);
 - Not have housing costs that would exceed their ongoing ability to pay the rent;
 - Not own the property lived in;
 - Be experiencing temporary financial crisis;
 - Owe no more than two months' rent in arrears; and
 - Have or will have long-term, safe housing.

Sources:

Richmond Rental Connect, Seniors Rent Bank,
<http://richmondrentalconnect.ca/other-services/seniors-rent-bank>, accessed
February 2017.

Personal communication with Rental Connect Liason (604-279-7077)