

Kaslo

Friday, March 9th

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

Attention: Patrick Wruck, Commission Secretary

RE: FortisBC Inc. 2017 Cost of Service Analysis and Rate Design Application - Order G-23-18

I write in further response to Exhibit A-3, and in direct response to Exhibit B3 and have uploaded this document to the BCUC website.

Despite my best efforts to anticipate filing of procedural proposals during the procedural conference, FortisBC managed to file a document to which I had no access until after the procedural conference had ended: Exhibit B3. In future I would appreciate being included in receiving any handouts made during oral discussions, prior to them being discussed, so I can participate equally as an intervener.

I therefore wish to make a late submission in direct response to FortisBC's timetable proposal as I have had no opportunity to do so before.

1. FortisBC's proposed timetable fails to indicate where any oral hearing might be held. In cross-examination a panel member asked about a West Kootenay location instead of Kelowna for any future oral proceedings.

In order to include customers who live in the West Kootenay in the hearing process I think an important principle is to alternate between the Okanagan and West Kootenay and note that there are two airports into which flights can be taken:

Trail
Castlegar

While there are climate related problems getting into Castlegar, this diminishes by May, and it is often easier to get into Trail during inclement weather periods.

Further the Commission should also consider that the FortisBC service area extends as far east as the East Shore of Kootenay Lake, the Creston Valley, and if you include the customers in the BCH Yahk wholesale area, Yahk.

Historically I have attended BCUC hearings at West Kootenay Power's former office between Nelson and Castlegar and in Castlegar and Rossland, and a BCUC AMI public session in Trail.

2. FortisBC's submission fails to differentiate between oral hearings and the right of any customer class to make oral submissions to BCUC during a hearing process. Prior to and

simultaneous to panel appointment, BCUC held public comment sessions on implementation of AMI and could again hold such sessions limited to the question of residential rate design in communities that request such sessions, like Kaslo. Seventeen Kaslo and Area D < RDCK, residential customers attended the FortisBC Tuesday, February 13th Kelowna session online, and 31 the procedural conference online on Tuesday, March 6th. In contrast only ten people attended the Kelowna information session and only 20 in Castlegar on February 16th.

3. FortisBC's submission fails to break out the set of residential customer issues that are currently highly contentious between the various parties interested in the residential COSA and rate design. The set of issues, internal to the residential customer COSA and rate design, which would benefit from an oral discussion, including round table and panel discussions, include:

COSA:

- i. Basic Charge
- ii Electric heat rate
- iii. residential rate that addresses low income customer needs without creating a low income customer rate
- iv. two tier versus flat rate
- v. net metering rate, noting that EES Consulting Inc produces Residential w/o Net Metering and Net Metering data in Schedule 1.1, 1.2, 1.3, 1.4, 1.5, 2.1, 2.2, 3.3, 3.4, 4.3, 6.2, 6.3, 6.4, 7.1, 8.1, 8.2, 8.3, 8.4 and 8.5
- vi TOU, in relation to winter and summer peaks and design in general, including regional and sub-regional differentiation between and within the West Kootenay, Boundary, Okanagan and Similkameen.

Rate Design:

- i. a rate that does not penalize low income customers in accordance with the stated goals and objectives of section 2 2 (f) of the *Clean Energy Act*
- ii a rate that does not penalize electric heat customers in accordance with section 2 (g), (h), (i)
- iii. a rate that does not penalize net metering customers in accordance with section 2 (a), (d), (k), (i) and (m)
- iv a rate that does not penalize low consumption users in accordance with section 2(b)

Until we settle on the manner in which we are going to discuss residential customer issues, I concur with some of BC Hydro's written submission and believe that FortisBC's proposed timetable is premature.

All of which is respectfully submitted,
Andy Shadrack
for Kaslo Seniors Community Association – Branch #81