

1) Preamble

1.1 BC Hydro, a crown corporation responsible to the citizens of British Columbia and granted a monopoly by the Province of British Columbia, should be held to a higher standard than Fortis BC, a private company which is governed to some extent by the need to satisfy its customers who have the ability to contract out of their service.

BCH customers in all practical sense do not have the option to contract to other electrical service providers therefore the only consumer protection is through the Province, Courts and regulating authorities.

1.2 Throughout this hearing BC Hydro has confirmed that :

- BCH has indicated that its preferred objective would be the reduction of participants in the Meter Choices Program (MCP).
- BCH has confirmed that participation in the MCP would be expected to increase as the charges decrease.
- BCH has confirmed that it expects that the level of participation in the MCP will be dependent upon the charges for each option.

Therefore it is reasonable to conclude that BCH has no incentive to seek options that would reduce the financial burden on participants in MCP.

1.3 BC Hydro submissions have all been based on an arbitrarily established set of conditions with no attempt made to accommodate customer concerns outside of their own interpretation of Direction 4.

1.4 Direction 4 is not consistent with the stated Provincial policy as expressed by Energy Minister Bill Bennett. He stated that “ we don’t want to force people to have a smart meter if they really don’t want one” and that BCH needs to be “damn sure they are not padding costs”. Direction 4 mandates a narrowly defined course of action that does not provide what would reasonably be considered choice and which also would require unnecessary costs to execute.

The concept of one's home being a sanctuary has been recognized in British Common Law since the mid 1600's. Smart Meters, if uninvited, violate that sanctuary both through radio frequency emissions and personal information gathering.

Considering that, it is therefore reasonable to expect that the Province intended to provide a legitimate choice to residents to say yes or no to the attachment of a smart meter to their residence (sanctuary) and that:

- the choice would have a semblance of perpetuity, not the one or two years when the meter seal expires.
- the choice would be personal, not location based and therefore should be transferable from one home to another.
- the choice would be available to all citizens who believe their sanctuary is violated, not just those who were able to afford a financial penalty based on an arbitrary course of action
- the choice would include those who refused the smart meter for security reasons.

2) Intervention Statement

Given the narrow mandate of the Commission I will address only the BCH cost estimates for meters, meter reading and inspection. My purpose is not to directly dispute the costs as they pertain to the BCH stated option but rather identify other possible options which result in less overall costs and by doing so establish that BCH has the ability to better accommodate its captive customers and that by not doing so have "padded" the costs.

2.1 Meters: BCH could eliminate any costs associated with digital meter conversion and analogue replacement if the MCP participants were permitted to purchase their own approved meters and have them installed and sealed by a certified electrician. Base model meters are available at an affordable price and could be fitted with theft detection modules but without radio transmission or data logging modules which would satisfy both health and security concerns. For the customer the purchase and installation costs amortized over the meter lifespan are significantly less than the BCH option.

2.2 Meter reading: The District of Metchosin, under contract to BC Hydro ,could provide meter reading, information gathering and field inspection within municipal boundaries at no cost to BC Hydro. The District would recover its own costs from

the MCP participants through municipal billing on a nonprofit basis. The service would be performed either through its building inspection or fire inspection departments whose personnel are already trained to undertake similar tasks. Additional training to satisfy BCH standards and equipment would be done at the expense of the District. The District has investigated the feasibility of the proposal and has determined the costs as follows.

- Assuming 200 MCP participants (roughly 10%)
- 100 KM of municipal roads
- Vehicle expense of 66 cents per km as per CAA calculator
- Total payroll costs for one inspector – \$44.40 / hr.
- Read, record and inspect including travel time 10 minutes per meter.
- Average of 2 hours per day for breaks and driving time to each zone

Labour cost	7 days at 7 hours per day	\$2,175
Vehicle cost	Average of 50kms per day (7 days)	\$231
Billing and reporting expense	\$2,250 (annual)	\$375
Total cost per meter	Bi-monthly reading and inspection	\$13.90

In addition to significant cost reductions this option represents a reversal of the BCH position by allowing any savings obtained through efficiencies gained, to transfer directly to the customer rather than the supplier. Under the BCH proposal cost savings would accrue to BCH due to the fixed rate charged to the customer.

Note : BCH (District of Metchosis, IR 2.2.2) provided a predictable smart meter radio communication range of 400 meters in suburban areas. GIS analysis of Metchosis residences using those figures indicates that even with an opt out of 10%, randomly distributed, the need for range extenders would be unlikely or insignificant with respect to overall cost.

3) Summary

The arbitrary actions undertaken by BCH have created feelings of anger, distrust and betrayal among a large portion of the population of British Columbia who see themselves as victims of an uncaring government. This attitude unfortunately spills over to local government which relies heavily on voluntary compliance of its regulations to achieve its purpose.

The options I have suggested would not only reduce costs to the MCP participants but also largely eliminate costs to BCH as they pertain to this hearing. Options that permit some ownership, either locally or individually, of the process would serve to alleviate a lot of the ill will that is sure to continually plague us otherwise.

If the Commission believes that it is not within its mandate to encourage BCH to examine practical efficiencies or consider customer concerns then please establish rates that at least reflect what costs would be following reasonable efforts to achieve those efficiencies.