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Stakeholder in RIB Rate Report

September 23, 2016

British Columbia Utilities Commission  
6thFloor, 900 Howe Street  
Vancouver, BC  
V6Z 2N3

Attention: Ms. Laurel Ross, Acting Commission Secretary and Director

**Re: Request for Moratorium Due to Extensions**

I am writing as a stakeholder in this process to request that the BC Utilities Commission order a temporary moratorium on the two tier RIB rate structure while the rather lengthy, thorough process to produce a report is taking place. This request is because it is becoming apparent that there will be a lot of rural and environmentally caring people that will suffer unreasonably high heating costs again this winter. We should be inclusive and thorough in this process, but not at the expense of those who have been suffering since the inception of the RIB rate structure. Another winter is unconscionable.

It should be very clear that there is huge dissatisfaction with the RIB rate structure by the large number of letters-of-comment received by people who made the effort to take some action. Many people will complain to neighbours and such, but will not take action because of their apathy and the apprehensive nature of this process that puts private people into public focus. It should now be clear that this RIB rate structure violates Bonbright Principle #4 (Principle 4 Customer understanding and acceptance);

It also does not satisfy Bonbright Principle #3 for affecting conservation and environmental protection when it promotes the use of fossil fuels (Principle 3 Price signals that encourage efficient use and discourage inefficient use (consideration of social issues including environmental and energy policy));

A structure that has such a relatively high inception point (for bulk energy metering) to a higher rate for those with gas and relatively so very low for those with electric heating cannot encourage efficient use. It also violates Bonbright Principle #8 (Principle 8 Avoidance of undue discrimination (interclass equity must be enhanced and maintained)).

It was on Global Vancouver news this AM that the city of Vancouver is pushing to have a 70% reduction in use of natural gas by 2020 (but put 2050 on the screen). They are warning that heating costs will increase a lot by converting to electric heat. This flies in the face of what has been happening on the provincial scale and there will likely be a lot more unhappy people next spring after this newsworthy event unfolds through this winter.

It is very accommodating and inclusive for BCUC to allow the BC Hydro additional extension and even to imply that a further extension would be acceptable with adequate notice. Perhaps BCUC should also be accommodating to those who have been suffering; by ordering a temporary moratorium on the RIB rate structure and return to a flat rate. It will not be such a burden on large corporations to make up any loss of revenue with a rate rider after this process has been finalized; than for individuals to have unrecoverable, unbearably high heating costs. It may also encourage the utility companies to put more effort into completing this process.

J. A. DeCock, retired senior electrical engineer



Cc: Honourable Bill Bennett, Minister of Energy & Mines & Responsible for Core Review