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March 17, 2012

Ms. Alanna Gillis ,  
Acting Commission Secretary ,  
British Columbia Utilities Commission ,  
Sixth Floor, 900 Howe Street ,  
Vancouver, BC V6Z 2N3 ,

Dear Ms. Gillis,

Re: BC Hydro's Amended F2012 –F2014 RRA

Attached please find **my Evidence Submission**. My attempt at providing evidence shall be limited due to time constraints- working on my own without assistance - and my limited computer skills.

The vast amount of documents filed with the Amended F2012-F2014 RRA filing at the end of November 2011, the thousands of pages filed as Responses to Intervener Information Requests, the Amendments to the Amended F2012-F2014 RRA, the NS application, correspondence and revisions of data and information are **impossible** for one individual to read, to assimilate or to address.

I admit that only sections have been read, or perused. My objective was to focus on only specific areas. Hence I am certain there shall be errors and omissions. Once again, I apologize.

My intervener effort has been daunting and the personal costs high. However, I would like BC Hydro and the BCUC to know that I was so alarmed when I learned about the enormous Costs/ Debt BC Hydro was incurring that I felt something had to be done to put a stop to this.

Normally, when the public becomes informed about projects that are about to have major impacts – be it environmental, economic or social- individuals and groups will become organized to raise Public Awareness, **will intervene** and sometimes succeed.\*

It is my view that **Residential Rate Payers** were not made aware of BC Hydro's **Smart Meter Plan** and its **COSTS**; **nor** is the ordinary Residential Rate Payer aware of the **Hundreds of Millions** of Dollars BC Hydro is spending on **DSM**. Even less aware are most Residential Rate Payers about the close to **5 Billion Dollars BC Hydro is raking up in DEBT by 2017 to be paid for generations to come**.

Respectfully submitted,

Ilse Leis

\* Stopping Privatization of Capilano Filtration Plant,  
**the HST** are only a few of many that could be cited.

Ilse C. Leis: EVIDENCE SUBMISSION

Project No. 3698592  
British Columbia Utilities Commission (BCUC)  
British Columbia Hydro and Power Authority (BC Hydro)  
Amended F2012 to F2014 Revenue Requirements Application

**Preamble:**

Now that I have perused numerous sections of the thousands of documents, I should be **resigned** and in **despair**.

There have been so many revisions, corrections, amendments to amendments to the Amended F12/F14 RRA, indeed such a vast amount of information that the sum total becomes confusing and overwhelming. It is impossible for one individual to analyze, synthesize and respond to such information overload.

Nonetheless, I shall endeavor to present evidence for the following issues/objectives:

My #1 Issue is to get **BC Hydro to cut the DSM spending by at least 60%** over the F2012-F2014 period. I realize that according to BC Hydro BCUC Intervener Responses approximately 70% of the 2012-F2014 DSM spending has already been contractually committed. (for details see Response to BCUC Info Req. No 1.450.1 Dec.23) However, BC Hydro executives and staff are ingenious, so a way out of that dilemma can be found.

Furthermore, BC Hydro shall inform Residential Rate Payers of the **COST** of every Residential DSM program via its bi-monthly billing over at least a 12 months period. BC Hydro asserts the Public Documents such as BC Hydro's **Annual Reports** provide information on the company's costs.

Yes, and how many customers know where to access these and how many Residential Customers will have the time or make the effort to read such Reports. The **current** inserts about Power Smart could just **add COST of the Savings BC Hydro supports**. I am certain customers would be quite surprised which companies BC Hydro actually pays.

My # 2 Objective is to stop the **In-Home display phase of the SMI program**.

Objective # 3 is to address **POWEREX** and the **exorbitant** earnings of numerous individuals **relative to the Net Income flowing to BC Hydro and BC Hydro's possible ability to assist POWEREX to exceed the \$200 Million mark**.

**So, while the BC Government is trying to balance the budget, BC Hydro is increasing its Debt to 5 Billion Dollars by 2017. The BC Government has a NET ZERO increase in Costs, while BC Hydro spends MILLIONS ON DSM to be paid in the Future. What is going on here?**

## TOPIC #1 DSM

### **No one will argue against Energy Conservation!**

However, there has to be a Balance between the Benefits of Energy Conservation, the Environmental costs such as the Run of the River IPP's and the Economic Costs to BC Residents.

BC Hydro states: Due to DSM “ In **F2036 the reduction in revenue requirement is estimated at \$2, 600 Million. “ ( Amended New Appendix II page 64 and page 65 – Revision 2 Appendix Update April 5, 2012 )**

**That is 22 years from now. It is astounding that BC Hydro has such confidence in its estimates and the future. My grandchildren will hopefully be around by then and I shall promptly ask them to put a NOTE on their computer, or other devices to check-up on that in 22 years.**

**To commit to spending close to 2 BILLION DOLLARS ( SMI and DSM Programs) without a PRIOR detailed, realistic Plan for recovering the debt ahead of committing the Costs is, quite frankly, almost INCONCEIVABLE, IRRESPONSIBLE and COMPLETELY UNACCEPTABLE.**

**Encumbering British Columbians with HUGE DEBT to be paid in the future, by future generations, even if supported by the Government throughout 2004 - 2010 is NOT in the Public Interest.**

It appears now that BC Government, BC Hydro and POWEREX were intricately involved and working together in a symbiotic relationship throughout 2004 to 2010. The **economic situations** changed **dramatically** - world wide - since 2008. Yet, throughout 2009 and 2010 neither the government nor BC Hydro **adjusted** to the **NEW REALITY**. Both the Governments and BC Hydro carried on as usual. **The SMI project should have been delayed for future years when the cost would likely have become lower due to more advanced technology and greater distribution. Later year installations may not have resulted in such a large deferral for such a long time period.**

**Failing to address** the new economic circumstances – which can also result in LOWER Electricity Demands, -actually admitted by BC Hydro- **is not in the PUBLIC INTEREST.**

In a Democratic Country, citizens cannot be forced into economic situations just because the Government of the day had a specific agenda, with far reaching consequences.

It is the opinion of many of my acquaintances, that there **is nothing one can do** about **anything.**

**When I look at families with children in the park, I sincerely hope this is not true.**

Residential Rate Payers have a **RIGHT** to be informed about Billion Dollar COSTS when programs are **in the planning** stages, not **after Hundreds of Millions** of Dollars **have already been spent**, **Hundreds of Millions** more have been committed and **CONTRACTS for Hundreds of MILLIONS OF DOLLARS** have already been signed **without a detailed plan for Debt recovery.**

**Despite the NEW Government Regulations issued on December 8<sup>th</sup>, 2011** and the Recommendations made in the **Review** of BC Hydro in the summer of 2011, **BC Hydro is “strongly of the view”** that BC Hydro should continue with its plans to bring British Columbians into a huge debt situation.

The following is reproduced from BC Hydro’s February 28<sup>th</sup> letter regarding the amended Amendment of Appendix II and from the amended Amendment of Appendix II for the sole purpose to let BC Hydro that I am aware of their rationale.

“On December 8, 2011, the Government issued Ministerial Order No. M335 amending the DSM Regulation, B.C. Reg. 228/2011. In addition to amending certain defined terms in the DSM Regulation, B.C. Reg. 228/2011 made substantial changes to the total resource cost test prescribed in section 4 of the regulation, which increase the benefits of demand-side measures for total resource cost test purposes. A copy of B.C. Reg. 228/2011 and the amended DSM Regulation is provided as New Appendix C-11. A description of how the DSM supported by the F12/F13 DSM Expenditures are cost effective in accordance with the amended DSM Regulation is provided in Amended New Appendix II, Section 3.9.

The amendments to the DSM Regulation increase the benefits of DSM for total resource cost test purposes, and the cost effectiveness of the F12/F13 DSM Expenditures is significantly increased as a result. However, BC Hydro has not changed the F12/F13 DSM Expenditures. BC Hydro continues to believe that it would be premature to change course on its DSM efforts prior to completion and approval of the Integrated Resource Plan. BC Hydro views on this issue, as set out in section 2.8 of Appendix II, have not changed.”

BC Hydro February 28<sup>th</sup> Amendment to the Amended Appendix II  
**Revision 1 – February 28, 2012]** Summary of the Application

The F12/F13 DSM Expenditures are based on continuing on the path set by the DSM Plan, updated to reflect new information on energy savings opportunities and

plan performance (Updated DSM Plan) as described in section 3.2 of this appendix.

In addition, BC Hydro has adjusted its F12/F13 DSM Expenditures in response to the recommendations of the Government Review of BC Hydro.

BC Hydro will be submitting its IRP to the Minister by December 3, 2012 in accordance with the requirements of the Clean Energy Act. In developing its Integrated Resource Plan (IRP), BC Hydro has been consulting with stakeholders regarding the costs and benefits of DSM measures and supply-side resources that BC Hydro might pursue to achieve electricity self-sufficiency. An important question for the IRP process is how much DSM BC Hydro should pursue in F2014 and future years.

Pending Lieutenant Governor in Council approval of the IRP, BC Hydro is strongly of the view that its DSM efforts in F2012 and F2A13 should remain on the path set by the 2008 LTAP DSM Plan. A decision to change course significantly on DSM efforts at this time would be premature and could have significant, negative consequences because of the nature of DSM flexibility. DSM is a flexible resource compared to supply side resources, however, there is limited ability to ramp up DSM over the short term.

Given the limited ability to ramp DSM back up over the short term, BC Hydro is strongly of the view that DSM should not be ramped down due to short-term

conditions. A decision to ramp down DSM would be regrettable if it turns out as a result of the IRP or otherwise that more resources are needed to meet the electricity supply obligations and BC Hydro's ability to acquire 1 cost-effective DSM has been impaired by the previous decision to ramp down DSM. Until BC Hydro was able to rebuild credibility and momentum in the marketplace to enable ramping DSM back up, it would have to rely on more expensive supply side resources to meet the need. For these reason, and as further elaborated in section 2.8 of this appendix, BC Hydro is strongly of the view that its DSM efforts in F2012 and F2013 should remain on the path set by the 2008 LTAP DSM Plan.

Due to the projected size of BC Hydro's **DEBT** I do **not accept** BC Hydro's rationale! So there is no need for a further explanation or rebuttal.

**To BC Hydro the DEBT is just another Figure on a page.** As a Rate Payer, I see BC Hydro's Costs from a different perspective.

I wonder what my Banker would say if I asked for a Hundred Thousand Dollar Loan and my reply to the question: "How are you going to repay this?" was : I have no clue. I'll think about it in years to come.

"BC Hydro is strongly of the **VIEW** that its DSM efforts in F2012 and F2013 should remain on the path..." is **not really relevant**, if the Debt about to be incurred has alarmed the current **Government**, the **REVIEW PANEL**, the **AUDITOR GENERAL**, **the BCUC and some interveners.**

BC Hydro staunchly insists on its **VIEW**. Therefore, "BC Hydro has not changed the F12/F13 DSM Expenditures."

What will it take to get BC Hydro to go with a more **flexible View**. ( Note in the above BC Hydro section states "the nature of DSM is flexible")

So how come we see no evidence of **FLEXIBILITY?** **Hydro's VIEW** – or **RATIONALE-** is unassailable, like a fortress!

**BC Hydro continues to be "of the view that HUGE AMOUNTS MONEY MUST BE SPENT, NO MATTER how large the SIZE OF THE DEBT. " It is an interesting "View" but VIEW does not really count. FACTS DO!!**

**THE FACTS ARE THAT THE DEBT IS REAL AND future ELECTRICITY SAVINGS due to DSM whether in Dollar Mounts or GW's ARE AT BEST ESTIMATES , and constantly changing at that, Plans that change considerably with Actual spending or Savings, Forecasts, HOPEFUL PROJECTIONS, and ENDLESS Justification STATEMENTS that are often UNSUBSTANTIATED by SUBSTANTIVE VERIFIABLE STATISTICAL DATA.**

BC HYDRO often uses **CONFIDENTIALITY** as justification for not producing or limiting evidence. In my reading of IR's, the Responses use of the Confidentiality issue was exaggerated or was overused. Answers to highly specific, detailed information or data were often avoided or sidetracked.

**From an overview perspective of the responses one can assume that BC Hydro wants total control and no interference from anyone. There are too many examples to cite and reference.**

Even to a mild suggestion from BCUC to consider a change regarding the EC&C Committee, BC Hydro is dismissive:

The RESPONSE issued Dec. 31, 2012 to BUC Info Req. **No. 1.448.3** states: “BC Hydro’s EC&E Committee provides an ongoing forum for engagement on BC Hydro’s DSM strategy and plan....” The Committee is engaged on the DSM Plan and on a range of specific initiatives to generate innovative ideas....”

However, it turns out that the EC&C Committee “is only advisory..... in order provide advice....” April 5 RESPONSE to BCUC IR No. **2.203.1**

In the same RESPONSE referenced above, “ BC Hydro is **of the view** that Committee member’s interest in a specific budget line item in one DSM Plan to another would vary based on a number of factors, such as a Committee member’s particular interest, the impact on the resulting initiatives and impact ..” Yes, that might actually be a good idea !

As a residential consumer, I had always assumed **BC Hydro was in the business** of the maintaining, upgrading Heritage Electricity Generating Facilities and associated facilities, overseeing adequate electricity supply and securing functioning transmission lines.

In other words, BC Hydro is in the **BUSINESS** of the **delivery** of **Electricity**.

**It appears that BC Hydro is now in an entirely NEW and HUGE industry. BC Hydro’s new Business is to fund and promote new technologies.**

As far as I know, the Federal Government **provides funds for research and innovation.**

**Energy Conservation is in everyone’s interest !! Energy Conservation should be practiced by everyone.**

**However, BC Hydro’s rapidly expanding NEW BUSINESS comes at too great a Price: unsustainable, rising Debt.**

The justification RESPONSE dated January 31,2012 to BCUC information request No. **1.448.4** Is just one example of how BC Hydro views it’s New Business: “**Yes there is a minimal risk that.....could result in BC Hydro supporting one technology where an alternative could offer a better long-term solution. However, BC Hydro mitigates these risks by.....**”

BC Hydro's **Demand Side Management Milestone Evaluation Dec. 2011**  
states

“BC Hydro resumed demand-side management activity in 2002 and, since the resumption of **DSM**, undertaking evaluations has been a core activity.

DSM, undertaking **evaluations of DSM initiatives has been a core activity.**”

So if the evaluations are such a “core activity” **spending should be going DOWN** – that is **decreasing-** as Industrial, Commercial and Residential Users perceive the benefit of reducing energy consumption. How many years does it take. ( There is no need to answer this.!!) After five years of experience and **incentives**, DSM Cost should **NOT** increase from **\$46.4 Million in 2007** to **236.3 Million in 2014.**

There is a long list of Companies BC Hydro supports financially- that is provides \$ incentives. If I can re-locate it in my paper cluttered house, I will provide it at a later date. I have to say I was **shocked** when I saw the list which included large chain stores.

I was stunned to see an add on the CBC for a LONDON DRUGS AD about a more efficient TV. Now I occasionally shop to London Drugs and they are always extremely busy. I do not have their financial statements but I do **not** believe London Drugs needs my financial support. NOR could many households afford such a TV.

In any case, the market is glutted with ever larger screen TV's, iPods, texting phones, and a seriously out of control Gadgets that use more and more electricity. The public should be educated to stop the unsustainable buying spree not provided with incentives.

It so happened that I was at London Drugs during their current promotion of energy saving light bulbs. Although the store was very busy, I noticed no one stopped at the prominent promotion display. Yet I purchased an Ambient LED 12.5W Dimmable Bulb for \$29.99 less the generous \$10.00 Power Smart Coupon. The Light Bulb box tells me it will last 22.8 years. The package also tells me that it has life span of 25,000 hours and shall save me \$118.75 . I checked the calculation and it does indeed come out to 22.8 years or a saving of \$5.21/per year assuming I use it for an average of 3 hours per day throughout any one year. The bulb is large, heavy and has a truly ugly yellow cover.

In its **Response** to Ilse Leis Intervener Information Request **No. 2.1.2 dated** March 6' 2012 BC Hydro lists : 5 Barriers to Residential Customers ability to purchase efficient electronic supplies. The **first 3 are certainly not the case** in the Lower Mainland. Cost and dislike are legitimate barriers because the cost of light bulbs is prohibited as shown above. The average person shall likely not spend \$14.99 for 3 light bulbs with a 7 year life span. Many of the ordinary light bulbs in my house have been working for 10,15 or more years.

The energy efficient light bulbs are super costly, look unattractive and produce a harsh light. In my experience in the last year, the CFL bulbs **have an extremely short life span. I had to hire electricians on two occasions to replace the bulbs after only a few months.** When I complained the **two different electricians** (from **different** companies)

**responded: “use dimmer switches, the light bulb technology is not good enough yet.”**  
( It will take time but I believe I can find the receipts for bulb installations. )

**So let us admit, that is let BC Hydro recognize – that the technology is just not there yet.** In other words BC Hydro may be flailing around and spending money prematurely. The technology will improve – in time. Estimates, forecasts, etc. do **NOT** justify putting BC Hydro Customers into **multi-Billion** Dollar Debt based on **questionable efficacy.**

In its Response to Ilse Leis Intervener Information Request **No. 2.1.5.3.2** dated March 6<sup>th</sup> 2012 BC Hydro states,; **“Manufacturers and retailers determine which products to sell based on consumer demand and the expected profit that they can make.”**

I think **Steve Jobs** would have had a problem with this statement. He had A VISION of what computer technology might be able to do and being **brilliant.** He through experimentation he came up with new ideas: the Apple Computer and later increasingly more incredible devices. However, it took years and years of hard work and dedication. His initial accomplishments **were not** based on Consumer demand. **He created the demand.** Commodore 64 Computer users **did not go** to Steve Jobs and **demand** a more user friendly computer.

Alexander Graham Bell did not experiment and finally invent the telephone because he was informed that consumers were lining up at his door steps clamoring for a telephone. Speculative Investors may have assisted and promoted the development. **BUT** the invention of the telephone did **not** occur because of consumer demand. The ordinary future consumer base was likely unaware of the invention of a telephone until it came into production and became marketed.

It is unlikely that the **brilliant** Albert Einstein’s years of study and experimentation were motivated by **consumer demands.**

Another example of hundreds one could cite, is Sir Frederick Grant Banting. An article he read about the pancreas piqued Bunting’s interest in diabetics. Further studies and collaboration led to the discovery of insulin. The causation of the discovery of insulin was not demand, although I am sure future users/consumers were most grateful.

Discoveries, innovations and improvements often result from interests and prolonged dedication. It may be a difficult concept for BC Hydro Executives and Directors to understand: But \$ incentives are not the only drivers of progress.

There are an incredible number of examples I could cite **where manufacturers create demands, especially expensive ones - through marketing.**

**I think even spending driven BC Hydro can get the point without multitudes of evidence.**

**If manufacturing energy efficient technologies are not profitable, it should tell us something!!! Like the Commodore 64 – the technology will get better. Meanwhile, residential consumers should not be induced to buy products of questionable efficacy by rebates which the electricity consumer actually pays.!!!**

**The EFFICACY of DEMAND SIDE MANAGEMENT for Residential Rate Payers where ONLY of about 20% of the almost 1 Billion Dollars (by 2014 in Deferral Accounts to be amortized over 15 years with interest) is allocated to Residential Programs is highly questionable.**

**The Amended F2012-14 RRA –Amended New Appendix II Attachment 8, Table 1 the Expenditures and Incremental Electricity Savings for Fiscal 2011 shows the following:**

**Actual Total Residential Sector Expenditures = \$27,706,000. Hence, it showed a reduction of close \$ 39,374,000 or 57 % from the 2011 Plan expenditures. Incremental Energy Savings (Table 1 Notes including all DSM related expenditures) were shown as Residential Total : Plan = 145 GWh/yr , Actual 72 GWh/yr.**

**Most of the difference between 2011 Plan and Actual was in the Residential Behaviour item. It begs answers to several questions: Why was such a high Dollar expense in the 2011 Plan allocated Residential Behaviour ? Why was it not spent? Are the actual Incremental Energy Savings due to Behaviour actually feasible or measurable? Did the difference go to another DSM program?**

**Throughout my perusal of a large amount of information related to DSM it is my view that BC Hydro has insufficient causal and *statistical* evidence to support its claim that in years to come :**

**“There is considerable potential for BC Hydro customers to save electricity in a cost-effective manner. B C Hydro estimates this potential in the Residential sector at over 3,600 GW per year by 2016.” [Reference: BC Hydro RESPONSE to Ilse Leis Intervener Information Request No. 2.1.5. 3.5 March 6, 2012 ]**

**“Potential” and BC Hydro “estimates” are not statistically verifiable data. Hence there is no indisputable evidence that the close to a Billion Dollar DSM Costs by 2014 are in fact in the PUBLIC Interest.**

**In my own private life, there is considerable potential for making substantive savings in numerous areas of my spending. Potential is NOT the same as statistical certainty that this shall actually ever occur.**

**Some interesting Financial data does emerge from BC Hydro’s F2011 Annual Financial Report to BCUC.**

**In 2011 Residential Consumers** provided **\$1,370.1 Million** to BC Hydro's Revenue while the **Light Industrial & Commercial** generated **\$1,209.0 Million** and the **Large Industrial sector** contributed **\$527.3 Million** respectively.

**The combined Revenues of these three sectors comes to \$3,106.4 Million. Thus the Residential Customers' Revenue comes to about 44.1%. While a combined revenue from the other two sectors comes to 55.9 %. {Reference BC Hydro's F2011 Annual Financial Report to BCUC Attachment A Financial Schedules 15.0 lines 10, 11, 12.}**

Since the two sectors receiving **80% of the DSM Money-** are **only contributing** a combined total of **about 56% to B C Hydro's Revenue**, there appears to be **considerable inequity here!** (Using the figure of **\$3,106.4 Million** for the combined Revenues of the three sectors)

Now I do **not** have M & V for the expenditures for the **80 % of the DSM Costs, committed to the Large Industrial sector and Light Industrial and Commercial sector.** Perhaps the savings for these sectors are statistically verifiable. However, whether these sectors actually **absolutely require** these **Incentives** from BC Hydro is another issue altogether.

**Throughout the F2012/F14 BC Hydro repeatedly asserts that the DSM cost are justified because the Conservation Savings will result in reducing future costly infrastructure to meet Electricity Demands. Suggestion: Why not expand the once a year Earth day. Do the B C Place stadium lights and other large commercial buildings really need to be on every night. It makes a pretty evening skyline but is not essential!**

**I expect** BC Hydro will come up with some rhetoric to justify these incentives and that they accrue **"potential" benefits to Residential Consumers. However, it could certainly be argued that such large DSM expenditures for specific sectors are NOT in the PUBLIC INTEREST.**

There are other interesting statistics: **The Team Power Smart Program, started in October 2009, obtained 86,604 members by February of 2010. (During the OLYMPICS period.)**

Currently there are about "350,000 individual members as part of **the Team Power Smart among 77,000 households. At least 58,000 have logged into their online Team Power Smart members toolbox at least once over the past 12 months.**"

[Reference: BC Hydro RESPONSE to Ilse Leis Intervener Information Request No. 2.1.5. 3.5 ]

**Really! Let's see that is 77,000 households – or 58,000 one time participants in 12 months out of 1.63 million Residential BC Hydro customers/households. That works out to be about 4.7% for the first or 3.6% for the second number of one time participants in the last 12 months. That is really not impressive!**

**There are numerous instances throughout the Amended 2012-2014 RRA process where BC Hydro corrected data or changed forecasts of a variety of estimates. Hopefully, more knowledgeable interveners will point this out. I do not have the time to reference them but I shall attempt to provide a list if asked to do so.** The fact that the first Round of Intervener Requests consisted of 2800 and the second of close to 1400 should be evidence that something is clearly amiss in BC Hydro's reporting processes. **It leaves this intervener with little confidence in BC Hydro's ability or willingness to provide complete and accurate information.**

**Since I have little verifiable statistics** about the overall Residential M&V ( I thought in a response to an **AMPC IR**, the Response was that the **Residential portion of the DSM was not actually verified**) I thought I would look at the Low Income Program where data is available.

**NOW I WANT TO STATE CATEGORICALLY AND EMPHALICALLY, THAT I AM IN FAVOUR OF ASSISTING LOW INCOME GROUPS.** (Not just because I may soon be one of this group.)

**The following is section is strictly just a way of proving a point:**

Reference: F2011 Demand Side Management Milestone Evaluation December 2011.

“2. Low Income Program 2.11 Introduction

In 2007, the B.C. Provincial Government set out a plan to meet 50 per cent of future resource needs through energy conservation by 2020. In partial support of this initiative, BC Hydro designed an energy acquisition program for low-income residential customers in line with these long-range goals

Information on all program applicants receiving Energy Saving Kits during fiscal years 2009 and 2010 was obtained in April 2010.

(a) The number of households. Between 15 and 20 per cent of BC Hydro residential customers are designated low-income. This translates to a population of approximately 260,000 low-income households depending on prevailing socio-economic conditions.

As of March 31, 2010, the Low Income Program has provided approximately **21,000** low-income residential customers with ESK's,

This evaluation focuses on the Energy Saving Kit (ESK) component, which is a package of basic, low-cost energy savings measures believed to be easily installed by any homeowner or tenant. The kit includes Compact Florescent Lights (CFL), faucet aerators, low-flow shower heads, pipe wrap, caulking and draft proofing materials, outlet gaskets, window film and a number of smaller products and information on how to save energy in the home.

A detailed survey was conducted with **400-program participants** covering a wide

range of program attributes. When customers were asked how they became aware of the ESK offering the most important sources of customer awareness were BC Hydro billing statements (44 per cent), friends and relatives (14 per cent), magazines and newspapers (12 per cent) and the BC Hydro website (8 per cent).”

If a total of **260 000 Low Income Households** were identified, why were only **21 000** kits supplied?

I am certain, BC Hydro will submit lengthy **verbal** disputes and rebuttals of any evidence I have labored to supply. The BC Hydro Regulatory staff is superb in its ability to provide justifications of the Benefits for each and every cost.

All I can do is try. In the end it comes down to: **Can Future Residential Rate Payers** eventually pay such a huge DEBT Load when the Benefits **ARE SPECULATIVE AT BEST!!**

**BC Hydro may hold the view that DEBT is Great.**  
**As a residential Rate Payer, my view is that such a large accumulation of DEBT is NOT in the PUBLIC INTEREST.**

**By the Way, where do electric cars fit into these DSM Plans for F2012-2014.**

Financial Incentives do **not necessarily drive changes in Public Behaviour**. Education, provided via the Public School System can make enormous differences. Children learned in schools to stop littering. It took time but no extra money was needed to change our littering behaviour. I see young children reminding parents or showing them the waste containers. It is very sweet.

When I go to parks in my municipality or in others, I rarely see littering. Children and Adults use the Recycling and Waste bins all the time. I have observed individuals of all ages walking a considerable distance to deposit their bottles or waste. Yes, the depositories had to be available but their use became practically automatic through ordinary education at no extra costs. Amazing!!!

Another example, are the Waste Reduction Programs initiated throughout many Lower Mainland Communities. I shall provide the Port Moody's Waste Reduction Program Statistic. It began in the Spring of **2009** with short **BLITZ** of ads in Newspapers and a 5 or 6 months Flyer Program. The promotional costs were low and of short duration. **Now**, by the spring of **2012 only 3 years later**, Port Moody has achieved a **70% \* decrease** in WASTE DISPOSAL without paying **anyone!** No 10 or 20 year monetary incentive program needed. People get it!!! \* Static obtained from Donna Bucsis, Operations Assistant, Port Moody Engineering and Operations Department on April, 2012.

Waste Reduction is **highly inconvenient** for Residents because everyone now has at least **4 disposal buckets in their kitchen. In small kitchens, this is not convenient. A lot of Residents still do not like it. It is cumbersome, takes extra time and effort BUT people are doing it without paid incentives. What a surprise!!**

## Topic #2 SMI EVIDENCE

**Due to costs and numerous concerns expressed by Municipalities and individuals, the IN-HOME DISPLAY PROGRAM should be scrapped. A wide range of issues in various news papers, including privacy concerns.**

**Aside from the cost, the privacy intrusion, as far as I can recall from the SMI Business Case, the actual utilization by Residential Customers of the IN Home Display in other jurisdictions was minimal and even after 5 years was still only around 6%.**

**When I asked the question about how many households would actually use the display, to the best of my knowledge, Mr. Christianson stated he did not have that information. One of the attendees at the Workshop or at the Procedural Hearing responded “about 14% “. I do not have the time to verify this information at this point but shall soon as I can.**

**However, based on the information I have seen from BC Hydro’s SMI PLAN and SMI Business Case, this additional technology has little likely hood of being of being effective. Due to the cost, the projected minimal household use and the privacy issue, the SMI IN HOME DISPLAY PROGRAM is NOT in the PUC LIC INTEREST.**

**Therefore the IN-HOME DISPLAY PROGRAM should be abandoned.**

## Topic #3 POWEREX EVIDENCE

BC Hydro’s April 1, 2010 to March 31, 2011 Annual Financial Report submitted to the BCUC Attachment A page 2 of 30 shows the following:

<b>POWERX NET INCOME</b>	<u>F2010 Actual</u>	<u>F2011 Actual</u>
	<b>7.5 Million</b>	<b>71.5 Million</b>

The remuneration figures obtained from the BC Hydro website appear to be **exorbitant and out of line with Income**. I shall cite some of the Remuneration figures but shall identify them only by Amount– not the names .

**#1 \$ 586,048 #2 \$ 557,890 #3 \$514,088 #4 \$ 510,576 #5 488,781 #6 \$ 423,183**

**#7 \$ 389,757 #8 \$ 342095 #9 \$ 328,015 #10 330,099 #11 313,942 #12 \$ 301,794**

**# 13 \$293,110 #14 \$ 289,739 #15 \$ 282, 699 #16 \$ 281,666 #17 \$ 266,034**

**and 13 more earning over \$ 200 000. (I hope I counted that correctly.)**

**By my rough Calculation the total Remuneration for these highly paid individuals Comes to about \$17,277,979.**

I have no idea what the size of the bonuses were. Hopefully not 15% or 20%.

**BC Hydro claims that their Subsidiary POWEREX runs independently.**  
BC Hydro has no control over POWEREX.

**However, \$17,277,979 reduces the Net Income for POWEREX .**  
**and therefore, it reduces the BC HYDDRO'S INCOME!**  
**Ergo it reduces BC Hydro's revenue >>>>>leading to a higher**  
**REVENUE REQUIREMENT FROM RATE PAYERS.**

Actually it reduces the ROE BC Hydro pays to the Government.  
Could Hydro consider a cheaper subsidiary?

A further important issue that BC Hydro stated at one point it was suggesting **not**  
charging POWEREX Transmission fees - because it would not change BC Hydro's  
costs.

**It would however have two Benefits for POWEREX.**

- 1. POWEREX's income would be higher due to lower costs and  
would therefore make the Ratio to Income and Remuneration look  
less atrocious.**
- 2. It could result in POWEREX at some point reaching the \$200 000  
dollar mark which would impact Hydro and its Customers.**

A separate attachment is enclosed in to my e-mail which shows copies of  
Advertisements, coupons, etc. **Please ensure that you open this as well and  
add it to this Evidence submission.**

**Both this Submission and the Evidence Folder are important  
components of my submission.**

**Fearing I might run into problems if I combined them I  
decided to send two attachments.**

Hopes this works.

**Sincerely,**  
**Ilse Leis**

# FACT SHEET ENERGY STAR® LIGHTING

## LIGHTING TECHNOLOGY COMPARISON CHART

BC Hydro 50  
powersmart

\* Generally, the higher the lumens, the brighter the bulb  
 \*\* Assumptions based on 3 hours of use per day  
 \*\*\* Estimated energy cost: \$0.0878/kWh  
 Comparisons based on standard light bulb  
 [40W incandescent; 43W halogen; 15W CFL; 12.5W LED].

		COMPARING TODAY'S AVAILABLE LIGHTING TECHNOLOGIES			
TRADITIONAL TECHNOLOGY		Halogen	Compact Fluorescent (CFL)	Light Emitting Diode (LED)	
Incandescent					
FEATURES	ENERGY EFFICIENCY	Very Low	Low	High	Very high
	LIGHT COLOR OR "TEMPERATURE"	Warm	Warm	Options range from Warm to Cool	Options range from Warm to Cool
	DIMMABILITY	Smooth through full range	Smooth through full range	Partial Range (special dimming CFLs available)	Partial Range (special dimming LEDs available)
LIGHT OUTPUT (IN LUMENS)	400-500	40W	~ 28-29W	9W-11W	9W
	800-1000	60W	~ 41-43W	13W-16W	12.5W
	1100-1300	75W	~ 51-53W	18W-20W	Currently unavailable
	1600-1800	100W	~ 70-72W	23W-27W	
ESTIMATED OPERATING COST PER LAMP (BULB)	LIFE SPAN*	1,000 hours (~ one year)	3,000 hours (~ three years)	8,000 hours (~ 8 years)	25,000 hours (~ 23 years)
	ANNUAL ENERGY COST **	~ \$5.75	~ \$4.25	~ \$1.50	~ \$1.25

A11-353b

**SAVE \$10**  
 on the purchase of a  
**PHILIPS LED A-LINE DIMMABLE**  
 Single pack, 12.5W

Manufacturer's coupon redeemable only at London Drugs. Limit one coupon per item purchased. Not to be used in conjunction with any other coupon(s). Sales tax(es) applicable on price without coupon. Not redeemable for cash. Coupon valid March 1 - April 30, 2012



**SAVE \$6**  
 on the purchase of any  
**ENERGY STAR SPECIALTY CFL's**  
 3-pack

Manufacturer's coupon redeemable only at London Drugs. Limit one coupon per item purchased. Not to be used in conjunction with any other coupon(s). Sales tax(es) applicable on price without coupon. Not redeemable for cash. Coupon valid March 1 - April 30, 2012



**SAVE \$3**  
 on the purchase of any  
**ENERGY STAR SPECIALTY CFL's**  
 Single or double pack

Manufacturer's coupon redeemable only at London Drugs. Limit one coupon per item purchased. Not to be used in conjunction with any other coupon(s). Sales tax(es) applicable on price without coupon. Not redeemable for cash. Coupon valid March 1 - April 30, 2012



Date April 17<sup>th</sup> 2012

Fax Cover

From: Ilse Leis

BCUC Log # 39763  
**RECEIVED**

To:

Ms. Janet Fraser,  
Chief Regulatory Officer  
BC HYDRO

APR 18 2012  
Routing 36055

To: Ms. Alanna Gillis

Acting Secretary  
BC Utilities Commission

FAX # 604 -660-1102

Message: Despite every conceivable way I could think of, even drastically Reducing the content, I was unable to e-mail this page. So I shall fax it and Work on further reducing the size so I can send it to interveners.

Also I noticed that I sent you multiple copies of my written submission.

I apologize. I an simply not used to sending attachments.

Sincerely,

Ilse Leis

Number of ~~pages~~ : 4

Ilse Leis.

March 17, 2012

## EVIDENCE SUBMISSION

Power Smart Rebate Program:



First of all, in my opinion BC Hydro would be wiser to spend their employee time and costs encouraging the **manufacturers** to build energy efficient appliances at a reasonable price— **without monetary incentives.**

As a residential Rate Payer, I do not wish to take on the cost of assisting **WHIRLPOOL, MAYTAG, SAMSUNG , LG,** or any manufacturer to sell their products.

If the Government wants to assist **Low-Income Households,** such rebate funds should come out of General Revenue so **ALL** British Columbian Citizens and all Businesses and all Private Corporations shall contribute according to their taxable income.

**Trail**

# GREEN SALE!

MONDAY, MARCH 19<sup>TH</sup> TO SUNDAY, MARCH 25<sup>TH</sup>, 2012

**Whirlpool**

**LG**

Graphite Steel Stackable 5.0 cu ft Capacity Steam Washer and Steam Dryer

PAIR SALE PRICED  
**\$2199.96**

**\$150 POWER SMART MAIL-IN REBATE**

MSRP \$3400

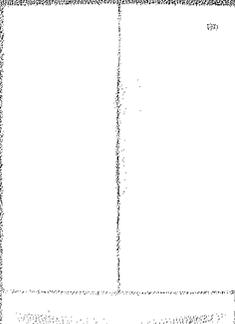
**Amana**

**FRIGIDAIRE** 12.9 cu ft ENERGY STAR

Now the Ad above shows a Power Smart REBATE of \$150 for an LG washer and dryer costing \$2199.96 .

The following page, shows a fancy **SAMSUNG Fridge** advertised for \$2399.98 with a \$100 Rebate from **Power Smart** and a similar \$100 **Power Smart rebate** for an **LG FRIDGE** advertised \$2699.98.

As a Residential Rate Payer, I am of the view that anyone who can afford to purchase such high priced items does not need help from a Power Smart rebate, the cost of which will ultimately be borne by all Rate payers.



# MAYTAG™

## 19.5 cu ft White or Black French-Door Bottom-Freezer Refrigerator

- FreshLock™ Crispers with Humidity Control
- 2 plastic freezer bins
- 4 adjustable door bins
- LED interior lighting

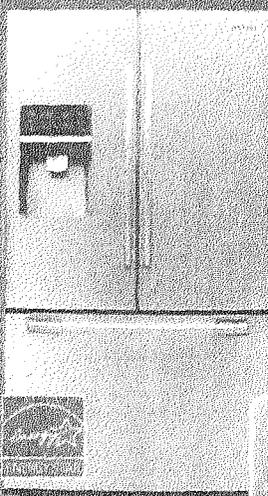


**SALE PRICED**  
**\$1299<sup>98</sup>**

**PLUS 2x THE \$50 REBATE!**  
**\$100 POWER SMART MAIL-IN REBATE**

Add \$200 for stainless steel

**PLUS AN ADDITIONAL 10% INSTANT REBATE**



# SAMSUNG

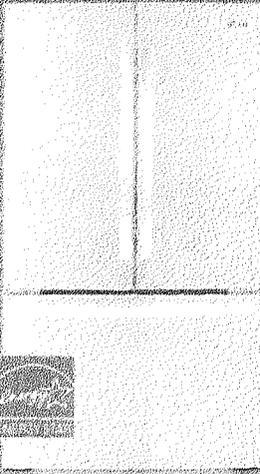
## 28.4 cu ft Stainless Steel French-Door Bottom-Freezer Refrigerator

- External ice and water dispenser
- Slide-N-Go Shelves allow for better organization of items by type and frequency of use
- Twin Cooling Plus System keeps your food at just the right temperature to last longer



**SALE PRICED**  
**\$2399<sup>98</sup>**

**PLUS 2x THE \$50 REBATE!**  
**\$100 POWER SMART MAIL-IN REBATE**



# LG

## 20.7 cu ft Stainless Steel Counter Depth French-Door Bottom-Freezer Refrigerator

- Contoured doors, wooden hinges and recessed LED lighting
- Linear Compressor motor uses fewer moving parts and operates more efficiently
- Internal ice maker


**SALE PRICED**  
**\$2699<sup>98</sup>**

**PLUS 2x THE \$50 REBATE!**  
**\$100 POWER SMART MAIL-IN REBATE**  
**MSRP \$3100**

**PLUS AN ADDITIONAL 10% INSTANT REBATE**

applicable rebates and offers. Pricing in effect March 19<sup>th</sup> to March 25<sup>th</sup>, 2012, while stock lasts.