
From: Paul LeMay [phl222@telus.net]
Sent: Wednesday, October 23, 2013 10:04 PM
To: Commission Secretary BCUC:EX
Subject: Online Registration

Wednesday, October 23, 2103.

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

Re: Registration as Intervenor in relation to Smart Meter Choices Program to contest proposed tariff level

Dear Commission Secretary,

As per the stated requirement posted on the B.C. Utilities Commission website for filing an intervention and to appear as an intervenor, we submit this letter in e-mail form, and do so to explain the rationale for our intervention.

We wish to contest B.C. Hydro's proposed extra opt-out fee on several grounds. First and foremost, the terms of service relationship between an account holder and B.C. Hydro constitutes a contract. Contract law dictates that any amendment to the terms of an existing contract necessarily requires the consent of both parties. Failure to obtain such consent constitutes a breach of contract which opens the offending party to civil proceedings. At this point, the account holder does not wish to change the terms of the existing electricity service contract, and we contend that the B.C. Utilities Commission represents the first adjudicating body that must rule on the validity of this contention.

Second, we wish to contest the amount of the proposed opt-out fee on the grounds that it is excessive based on the experience of other jurisdictions which have set much lower fees in this regard. California charges \$10 per month, after an initial \$75 fee, and for low-income households, the fee is even lower, namely an extra \$5 per month after an initial \$10 fee. The state of Maine charges an extra \$12 per month for analog meter readings, after an initial \$40 charge. By comparison, B.C. Hydro's proposed rates of a \$100 set up fee, followed by a fee of \$20 per month for radio-off digital metering, and \$35 per month for those who wish to retain their analog meters, particularly for health and safety reasons, seems rather punitive.

Third, we wish to point out that the proposed additional monthly opt-out fees supposedly reflects additional costs involved in meter readers having to come and read our meters on a monthly basis. This contention is problematic on at least two accounts. First, B.C. Hydro has rarely conducted a meter reading more than once a year in the apartment building in which the tenant has resided for over 20 years. (The last known manual reading occurred on September 27th 2013.) This implies that an account holder would in fact be charged a meter reading fee of \$240 per reading at a once per year reading rate for those wishing to be radio-off account holders, and \$420 per reading at a once per year reading rate for those wishing to retain their existing analogue meters. That hardly seems reasonable.

Second, in the case of apartment buildings like the Driftwood, where there are 74 apartments, their utility meters are banked together on boards in three separate rooms in the building. If it is B.C. Hydro's contention that the extra fees are required because of the supposedly higher cost of now having to send a meter reader out to the premises, it is difficult to square that with the fact that such costs were always part of the overhead cost factored into the current electricity rate.

But assuming your Commission did find that B.C. Hydro was entitled to offset the cost of carrying staff for the sole purpose of manual meter readings, I would like to point out that even at an overly generous hourly wage rate of \$60 per hour paid to such a staff person, in the case of an apartment with 30 meters in a single utility room, where it would only take two minutes to read each meter, that would require an hour's work. Thus if we apply the simple rule of a fee-for-service in establishing the level of such fees, then B.C. Hydro could reasonably add an additional \$2 to the bill of each account holder for the privilege of a meter reading, provided of course that they actually came to read the meter.

In other words, B.C. Hydro should not be entitled to charge account holders additional fees for meter readings which do not reflect actual work performed. Nowhere in business does such a practice occur. And if such a service is rendered, it really should not be based on some arbitrary number unilaterally claimed by B.C. Hydro. While we would be prepared to pay an additional fee for meter readings that were reasonable and in keeping with the actual cost of sending a service representative out to our building, we do not, from a contractual point of view consent to such a fee being charged at all, unless there is an actual reading.

Finally, we come to B.C. Hydro's contention that the proposed fees reflect the additional costs that would need to be borne by the corporation for maintaining a manually tabulated billing system in addition to its more efficient wireless system. At its foundation, this argument strikes one as fallacious. How can an already existing system require the addition of any new cost burdens, particularly when the new system is to create huge cost efficiencies?

This raises the possibility that these additional cost claims are little more than a smoke screen being used to justify an across the board increase in hydro rates for all hydro consumers. The fact that some people wish to opt out for health reasons, as is my own case, as I suffer from a long diagnosed heart arrhythmia condition, appears to have provided B.C. Hydro with an opportunity to impose a near punitive cost on our household, particularly when one considers what transpires in other jurisdictions. In our case, our electricity rates would in effect double from their current rates.

If B.C. Hydro is seeking to double consumers' electricity rates, owing to the rather exorbitant costs of bringing in a wireless digital metering system, whose safety has yet to be established by any credible health body in the world, then they should simply bite the political bullet and let all consumers know that they are about to be hit with massive increases to their electricity rates thanks to their supposedly more efficient electricity monitoring system. But if all the unanticipated new implementation costs only reflect but a temporary cost burden for the utility, then any increase should only be temporary as well, until such time that costs associated with a changeover to the new system can be paid down.

In fact, one could just as easily argue that those who opted for the new technology should pay for the new technology, while those who did not, should not. After all, it's not as though we're pulling down all of the hydro lines and poles and replacing them with new ones.

Sincerely,

Paul H. LeMay and Marlyn C. Collins,
Account #
#220 – 2055 York Avenue,
Vancouver, B.C. V6J 1E5
604-734-6934

Applications

- Current Applications
- Archived Applications
- Create Application Profile

Documents

- Current Documents
- Submit Document

Users

- Current Users
- Registration
- Distributed List

Others

- Companies
- Maintain Dropdown Lists
- Maintain Document Types

Edit User

Last Name, First; e.g. Smith, John

Name*: Collins, Marlyn and LeMay, Paul

Professional Designation:

Organization: n/a

Job Title: n/a

Representing: Self

User Type*: Applicant Interested Party Intervener Other

Address*: Driftwood Apartments,

#220 - 2055 York Avenue,

City*: Vancouver

Province*: BC

Postal Code*: V6J 1E5

Phone*: 604-734-6934

Cell/Pager:

Fax:

Primary Email: c6934@telus.net

Email 2: PHL222@telus.net

Email 3: PHL222@telus.net

Email 4:

Role*: EndUser

Approved Status: Approved?
Only approved users will be allowed to access submit file function.

* - Required

Copy to:

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Change user name and password

User Name* (No Spaces): Lightning

Password* (No Spaces):

Active Energy Reconsideration A-1-13
BC Hydro Application to Amend TS No 74 (GBL)
BC Hydro Electric Tariff-OATT Price Indices Replacement
BC Hydro MRS Assessment Report No 6
BC Hydro OATT Ferc Order 764 Amendments
BC Hydro PPA - RS 3808, TS No. 2 & 3
BC Hydro Smart Meter Choices Program
BCUC Generic Cost of Capital ~ Stage 1
BCUC Generic Cost of Capital ~ Stage 2
BCUC Proposed Regulatory Framework and Guide for TES Utilities
Creative Energy Acquisition of Central Heat Distribution
FEI Biomethane Post Implementation & Program Modification (2012 Biomethane)
FEI FEVI GSMIP 2013-2016
FEI Performance Based Ratemaking Revenue Requirements 2014-2018
FEU Common Rates, Amalgamation, and Rate Design Reconsideration Phase 2
FEVI 2014 Revenue Requirements and Rates
FortisBC Inc Purchase of the Utility Assets of the City of Kelowna ~ Phase 2
FortisBC Inc Stepped and Stand-By Rates for Transmission Voltage Customers
FortisBC Inc. AMI Radio-Off Meter Option
FortisBC Inc. Performance Based Ratemaking Revenue Requirements 2014-2018
ICBC 2013 Revenue Requirements
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