
From: Roger Middleton [roger.middleton@telus.net]
Sent: Tuesday, November 5, 2013 11:54 AM
To: Commission Secretary BCUC:EX
Subject: Fw: Smart Meter Choices Program

Re BC Hydro's Submission

Questions on Pricing

In determining the level of charges to be applied to opt out customers, has the Commission considered the net benefit BC Hydro will derive from the fact that these customers will be paying peak prices 24/7 once the off-peak pricing option is introduced to customers with operative digital meters?

Further to the above question, should BC Hydro seek and receive permission to eliminate Step 1 pricing, once the off-peak pricing option is available, BC Hydro would then receive an additional benefit from customers who opt out. Has the Commission taken this possibility into account?

Questions on Costs

S. 3.4.1. Capital costs

See questions for sub-sections below.

S. 3.4.1.2 Information Technology Integration

As the system is already working in parallel, with collectors still being installed in many rural areas, software and systems required to merge manually read and digitally collected data must already be in place. If this is correct, then to charge again for these requirements is to double charge RF-off and analogue meter customers.

Why then has BC Hydro included IT charges again for RF off and analogue meter users?

Why should existing software be upgraded to manage RF-Off and analogue meter customers when the existing system works just fine?

S. 3.4.1.3 Manual Meter Download Handheld Units

Why is new tablet meter reading equipment required for RF-off digital and analogue meters when both are manually read and given that existing hand held units are perfectly capable of carrying out this function?

Is it really necessary to standardize everything to the highest technical standard? Commonsense argues that "appropriate technology" be employed.

S. 3.4.1.4 Additional Check Meters - Theft Detection

Are not check meters already being deployed? If so, they should already be in place. If not, there must be a more logical way to determine theft location.

If a hard-wired digital meter option was to be offered in rural environments, would not additional check meters be unnecessary?

S. 3.4.1.5 Additional Telecom Equipment

BC Hydro proposes to use whichever option works best for transmitting data from collectors to base. See:

http://www.bchydro.com/energy-in-bc/projects/smart_metering_infrastructure_program/smart_meter_and_grid_technology/how_smart_meter_work.html

How Do Smart Meters Work?

In which BC Hydro says:

Information is sent to BC Hydro through existing infrastructure

"The fully protected data is sent from the collector to BC Hydro using existing communication infrastructure, such as **DSL**, **landline**, **cellular** or **satellite**.

A Digital Subscriber Line (DSL) is a family of technologies that provides digital transmission over the wires of a local telephone network.

This design ensures that data is sent in the most cost-effective way."

So, it is fine for BC Hydro to give themselves a hard-wired option, where circumstances make it the most cost-effective option. Why did they not consider doing the same for their customers?

If the hard-wired meter approach was adopted for rural, hilly/mountainous locations, would not range extenders be unnecessary?

S. 3.4.2. Operating Costs

S. 3.4.2.1 Account Processing Costs

Is this account charge being applied to all customers or just those with RF-off digital and analogue meters? If it is being charged across the board, then it is an item already accounted for in the pricing of electricity sold to all customers.

S. 3.4.2.2 Radio-Off Meter Deployment

Why should rural and suburban customers in low density suburban locations have to pay this fee when the better option would have been to install hard-wired technology in these locales?

S. 3.4.2.3 Training and Transition to Operations

BC Hydro already has agents that have been trained in handling customer enquiries. Why do we need to have new agents when experienced agents are on hand?

S. 3.4.2.4 IT Support and Maintenance

See comments and questions under S. 3.4.1.2 above.

S. 3.4.2.5 Analogue Meter Exchange - Meter Seal Expiry

The reality is that analogue meters are analogue meters. Renaming them "legacy" meters does nothing to bring clarity to this discussion. Why is BC Hydro changing language in this way?

It should be expected that digital meters will also have regulations applied by Measurement Canada that are similar to those that have applied to analogue meters. Will not this charge be common to all meters, be they analogue or digital?

If so, is it not already included in the cost structure determining the price we all pay for electrical power?

S. 3.4.2.6 Additional Field Investigation Resources

In many rural locations, the very low density of customers would make the installation of an RF mesh network system prohibitive. Why not provide the hard-wired digital alternative?

Are check meters or some kind of surveillance system not already being used in rural areas?

S. 3.4.2.7 Manual Meter Reading

BC Hydro already has handheld meter readers into which the meter reader can enter data. Why are hi-tech, sophisticated tablet computers using a special optical probe required?

Why do analogue and RF-off digital meters need to be read every two months?

I, along with many others, have been regularly emailing readings to Hydro's customer service, and this system has worked well. Why has BC Hydro has chosen to cancel their email address so that this meter reading method can no longer be used?

The option to switch to estimated monthly readings is still available. Both the former and the latter ways of recording meter readings only require one or two manual reads a year. What is wrong with these methods to record power useage?

General Questions

Were alternative digital metering systems explored on feasibility, cost and benefit basis? If so, what were the findings and is this report in the public domain?

Why did BC Hydro decide to standardize on RF Mesh Network technology?