
From: Commission Secretary BCUC:EX
To: Penny and Rodney Polden
Subject: RE: Intervenor IR's Round Two - BCH Meter Choices Program

From: Penny and Rodney Polden [<mailto:penrod@saltspring.com>]
Sent: Friday, December 20, 2013 11:49 PM
To: Commission Secretary BCUC:EX
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Subject: Intervenor IR's Round Two - BCH Meter Choices Program

Dear Commission Secretary

Please find attached my Information Requests Round Two.

Thank you

Yours sincerely
Rodney Polden

Rodney Polden - Intervenor 250 Sky Valley Rd, Salt Spring Island, BC

attached: Information Requests Round 2

- 1.01 Please provide documentation that substantiates the amount requested for meter reading services for those customers retaining an analogue meter. References elsewhere provided seem like a lot of money for such a small service that has until recently been covered by a much more modest service charge.
- 1.02 It has been indicated elsewhere that the meter reading process may be outsourced to Accenture. Please confirm.
- 1.03 If confirmed, please provide documentation of the bidding process to show that they submitted a bid that conformed in both content and price.
- 1.04 If confirmed, please provide documentation of the evaluation of that bid.
- 1.05 If 1.02 above is confirmed, please provide answers to the following. Since Accenture apparently provides a number of different services to both the provincial government and to BCH, and since utility meter reading does not seem to be a part of any of their normal services, please explain why they are considered to have the experience necessary. Please also explain why BCH considered them to be appropriate providers of the service. Please provide relevant documentation to support these explanations.
- 1.06 If 1.02 above is confirmed, is the provision of meter reading services connected to other services that Accenture is providing, and if so what are they?
- 1.07 If 1.02 above is confirmed, please provide documentation that shows that an evaluation of the potential attendant conflict of interest in such a situation was undertaken, and what the results were of that obviously necessary step.
- 1.08 Please provide any other relevant documentation that shows due process was ensured, in such a way as to make the award of the service provision to Accenture to be in the consumers' interest, and in such a way that the costs would be minimized.
- 1.09 It seems there are now high costs that BCH is proposing to pass along to MCP customers for many different functions (meter reading, theft detection program, a technician needing to return at another time to complete a task they did not accomplish, modification to BCH's 'internal' systems – IT, load balancing analysis, training, call centre costs and so on), for which previously the customer did not pay a separate charge either a) at all, or else b) only by way of a small standard charge levied to all customers. In previous IR's, BCH ascribed the need to do so to being required by government direction to put in place a program (MCP) it had not previously intended to undertake. Please confirm that this is still the case.
- 1.10 Can BCH cite any jurisdiction in North America where Smart Meters have been installed at 100% of residences of customers?
- 1.11 If BCH is unable to provide such an example, please cite alternatively an example of any other jurisdiction in North America where Smart Meters have been installed at 99% of residences of customers?
- 1.12 If BCH is unable to provide such an example, please cite alternatively an example of any other jurisdiction in North America where Smart Meters have been installed at 98% of residences of customers?
- 1.13 If, in response to 1.09, BCH is unable to cite an instance of the installation of SMs to 100% of residential customers in any other jurisdiction in North America, it is then evident that in the early stages of the planning process for its SM roll-out, provision was going to need to be made for the virtual certainty of BCH, as in the case of all other utilities, failing to achieve full 100% penetration of its residential customer base, and consequently the inevitable continuing existence of a certain percentage of customers retaining analogue meters whose existence in the system would need to be planned for, and their needs addressed. Please confirm.
- 1.14 If not confirmed, please explain why, even in hindsight, BCH continues to maintain everything necessary was planned for, even though the present outcomes of the process that we see in

place are already different to the 100% penetration that BCH previously thought itself capable of.

- 1.15 BCH stated in previous IR responses that the continued existence of analogue meters in their system had only occurred due to the government directing BCH to establish the MCP, yet with or without the MCP, there are still analogue meters in place at residences where customers have not involved themselves in any way with the MCP, as was (from the outset) readily apparent was going to be the case from the prior experience of other utilities across North America, regardless of whether those utilities instituted opt-out programs or not. Since BCH claims that they decided to do no planning for the eventuality that there would be less than 100% penetration (and consequent continued existence of analogue meters) despite the near certainty of that occurring, and since that has now come about exactly as might have been foreseen by any prudent planning process that was practiced with due diligence, can BCH please explain why it should now be particularly those customers in the MCP, rather than the general customer base, that should bear the burden of the increase in costs necessitated by BCH's initial decision that the only planning it would undertake would be for an outcome that no other utility in North America has been able to achieve?
- 1.16 Please confirm that it is not because the government directed BCH to create the MCP, that there are analogue meters still in the system, but rather because customers insisted on retaining their analogue meters, and continue to do so with or without any involvement on their part in the MCP.
- 1.17 In reference to Skogstad 1.2.1 : "Why is there now a need for an increase in effort, given that there will be a relatively small proportion of legacy meters remaining? Has monitoring of theft not already been occurring and therefore covered by the current fee structure? Does BC Hydro believe that there are sufficient numbers of people wanting the legacy meters to remain so as to steal electricity to warrant this additional cost?" and the response from BCH: " For several years, BC Hydro has monitored for theft through deployment of field investigation teams. With the implementation of the SMI Program, including the deployment of smart meters and distribution meters, the amount of field investigation effort engaged in theft prevention was to be reduced. However, the ongoing presence of legacy meters following the deployment of smart meters will necessitate additional field investigation resources." It seems that prior to the introduction of the SMs and MCP, it was BCH's practice to monitor for theft by deployment of field investigation teams, and at that time there was no additional charge to customers for this. BCH states "the amount of field investigation effort engaged in theft prevention **was to be reduced**" (emphasis added). Since BCH has made it clear from its previous responses that the circumstance that was supposedly going to permit the notional reduction referred to was the circumstance of there being only SMs in the system, thus enabling a change-over to a different approach to monitoring and theft-prevention, therefore please confirm that, yet again, one further element of the rationale for the high costs that BCH intends MCP customers to be required to cover, turns out instead to actually have been necessitated by BCH "planning for" an eventuality (100% penetration of the residential customer base) that has never yet happened anywhere in North America.
- 1.18 Can BCH explain why it adopted an 'expectation', a 'forecast', a 'hazy notion' that there would be no analogue meters still in place a year, or two, or three, after SM roll-out, despite the fact that it knew at the planning stage, or should have known, or could have known with due diligence, that in a majority of the other jurisdictions in North America there were still analogue meters in the system subsequent to SM roll-out. Please explain how it then came about that BCH decided to base **all** of its planning upon that apparently irrational expectation.

1.19 Please confirm that where existing plans have to be altered to accommodate new requirements or circumstances, additional costs result, beyond the costs that would be incurred if no new planning process was undertaken.

1.20 In previous responses, BCH has declined to admit: a) that its MCP charges are intended to be punitive (Polden 1.1.4); b) that it has any recommendations for which choice in the MCP a customer should make (Polden 1.3.8); and c) that there is a coercive intent in the proposed new measures such as 'failed installation' charges, charges applied for infrastructural changes, charges applied to cover the training of call centre staff, and the rest of the charges applied to cover many other costs that most impartial observers would discount as simply 'the normal cost of doing business' (Polden 1.1.6). Despite BCH's supposed stance towards this issue of apparent complete indifference to whether it achieves the government's direction to install a SM in every residence it can (aside from MCP customers, who will of course, let us remember, be paying BCH charges hundreds of dollars higher than other customers), day after day the Commission has continued to receive submissions from extraordinary numbers of BCH customers around the province, complaining of coercion, bullying, extortion and unfairness of costs, in the way that they have been treated by their public utility.

Please refer to the following exhibits: E-504 E-505 E-528 E-529 E-541 E-553 E-558 E-559 E-566 E-572 E-583 E-586-1 E-597 E-612 E-614 E-615 E-637 E-647 E-653 E-655-2 E-657 E-661 E-662 E-664 E-665 E-670 E-673 E-688 D-137-2 E-696 E-697 E-699 E-709 E-710 E-718 E-724 E-728 E-729 E-730 E-731 E-736 E-741 E-745 E-754 E-758 E-761 E-772 E-774 E-782 E-794 E-795 E-799 E41-1 E-110-1 E124-5 E127-3 E-219-1 E-502-4 E-804 E-806 E-810 E-825 E-829 E-832 E-835 E-839 D-85-1 E-840 E-849 E-855 E-856 E-859 E-862 E-863 E-865 E-868 E-136-1 E-194-2 E-872 E-876 E-877 E-879 E-880 E-881 E-883 E-886 E-887 E-891 E-892 E-670-1 E-895 E-898 E-904 E-905 E-938 E-940 E941 E-942 E-943 E-944 E-946 E-947 E-949 R-154 E-156 E-187

As will be quite obvious from reading the above exhibits, there is unquestionably a massive disconnect between (on the one hand) what hundreds of opt-out customers are reporting (in Letters of Comment voluntarily submitted, of which those above are just a sample) as being the actual 'receiving end' experience of what BCH is directing at them, and (on the other hand) what BCH is willing to publicly admit to being the tone, the substance, the intent and the effect of the communications BCH has undertaken, whether a) written - in the now six or more mail communications it has dispatched at significant effort and at a cost of hundreds of thousands of dollars, to those customers who have refused SMS; or b) by telephone – in the several successive call-centre approaches also directed at those customers who have still refused SMS; or c) in response to enquiries made to the BCH customer line. It seems there are three possible explanations for this disconnect: 1. The customers all got together and decided to tell the same untruth about what their experience has been; OR 2. BCH's planning team all got together and decided to tell the same set of 'corporate messaging' about having no preference at all which meter customers choose, about the fact that there are no punitive elements in the fee structure, and about how there is no intention to coerce anyone to take a smart meter out of financial hardship; OR 3. An enormous misunderstanding has occurred between BCH and its customers due to an error in communication, which BCH did not realize had happened.

Therefore, BCH is requested to please state which of the three explanations (No. 1, No. 2, or No. 3) for the evident disconnect between BCH and its opt-out customers comes closest to what BCH considers has happened, or alternatively offer another explanation that will provide further insight into this unfortunate nadir of customer relations for BCH. Since (speaking for myself) I am not aware of other previous occasions where an equivalent number of members of the public have written to the Commission expressing so much displeasure at how they have

been treated, and the unfairness of the costs being charged to them, I submit that this Information Request is fair to ask and deserves a considered response, particularly since in its deliberations the Commission will be addressing whether there is fairness and reasonableness in those particular proposed charges that lie at the root of the complaints of bullying, coercion, extortion and unfairness.

2.1 In reference to previous IR Polden 1.4.1 and response:

Since BC Hydro says that a customer being able to retain an analogue meter into the future years is conditional upon the supply being available from BC Hydro's inventory, what steps is Hydro presently taking to research other sources and availability on the world market?
RESPONSE: BC Hydro will not purchase any additional legacy meters.

Please confirm that (in the view of BCH) there are however no legal restrictions that would prevent BCUC directing BCH to arrange purchase of a continuing supply of such meters.

2.2 Please confirm that (in the view of BCH) there are however no legal restrictions that would prevent BCUC directing BCH to pursue purchase of a continuing supply of such meters from the same supplier(s) that provide(s) them to utilities with opt-out programs in the USA, and also supplies electro-mechanical meters to other utilities in Europe, Britain and Australia.

2.3 Please confirm that part of the original reason for the BC government directing BCH to initiate the MCP was in order to address the need urgently expressed by those with medical issues such as electro-hypersensitivity (EHS), cardiac arrhythmia and a variety of other medical conditions that require a person to not be in proximity of devices such as SMs.

2.4 Further, please confirm that if BCH by its **own** decision not to purchase further analogue meters (i.e. a decision not impressed upon BCH by government directive, but adopted by BCH for its own reasons) and to pursue its stated intention to eventually have only transmitting SMs, denies such persons into the future years (i.e. beyond the time when BCH will have exhausted its present un-replenished inventory of analogue meters) any possibility of being able to obtain electrical service without having to be exposed yet again to the very stressor that exacerbates their condition, then there will have been very little purpose achieved in setting up the MCP in the first place, as far as those particularly disadvantaged customers are impacted by BCH's decisions and actions.

2.5 Further, please confirm that it would in no way be either fair or reasonable for BCH to take \$420 per year for a few years from such persons with medical disabilities as mentioned previously, solely for permitting them the benefit of avoiding the damaging effects to their health that would be occasioned by proximity to a SM, only to then as it were "throw them to the wolves" by requiring them in the future to accept a SM, for no better a reason than that BCH chose not to purchase any further supply of the safe, reliable and non-harming meter that such persons need in order to a) be well, and b) have electricity.

2.6 If BCH is unable to confirm 2.5 above, can BCH at least confirm that it has gained some insights from these scenarios as to why so many BCH customers have written to the Commission speaking of their anger, frustration and contempt for the callous disregard that they have experienced recently at the hands of those who make decisions at BCH.

3.1 BC Hydro has presented to 'eligible customers' a set of 'choices', to which customers are attempting to make a response that best suits their needs. That task placed upon the eligible customers will unquestionably be facilitated by more information being supplied by BCH, so that a clearer picture can emerge of what conditions and outcomes will result in future, from each of BCH's 'choices'. Consequently, in order for MCP participants to have a fuller understanding of the details of their choices, please provide responses to the following IR's:

3.2 Please confirm or deny that all customers who received the recent "Meter Choices" letters from BCH will collectively share all the program costs of the MCP.

3.3 Please confirm that each customer group (smart meter, radio 'off' meter, analogue meter) will cover all the costs of the relevant customer group they have elected, or are deemed to have elected, to have joined (i.e. MCP analogue meter group covers all costs of MCP analogue meter group, MCP radio "off" meter group covers all costs of MCP radio 'off' meter group, and MCP smart meter group covers all costs of MCP smart meter group).

3.4 If such is not the case, and among those customers who received the recent 'Meter Choices' letters from BCH, there proves to be a certain number who, though previously having refused installation of a smart meter, and now finding themselves under pressure and financial hardship have been induced to give in and no longer resist installation of a smart meter, then **please confirm** that those customers will consequently bear all the same full financial burden of the entire smart meter program that every other customer in BC with a smart meter will find themselves carrying into the future.

3.5 Please confirm or deny that any possible future financial penalties and liabilities that are assessed against BC Hydro for reasons of e.g. lawsuits arising from negative health effects resulting in cancers and other degenerative diseases judged to be caused by forced exposure to smart meter radiation that was rendered inescapable by the actions of BCH management and personnel, its agents and assigns; lawsuits due to avoidable fire damage, property loss, injury and death from inadequately tested and incompetently installed equipment, that had been mandated, supplied, overseen and maintained by BCH; lawsuits over persistent and widespread inaccuracies and over-charges in smart metered bills, that were never rectified by BCH; lawsuits over widespread, unaddressed and uncorrected equipment faults and unintended system side-effects, despite such faults being repeatedly notified to BCH by customers; and similar causes, where risk and attendant liability is potentially found to have been foreseeable and avoidable by BCH yet was not acted upon – that all such possible future costs will ultimately be borne by the residential and business customer base of BCH, in the form of increased utility bills, as seems currently to be happening subsequent to the huge financial penalties from BCH's recent California fiasco.

3.6 If the above is not the case, please confirm that those MCP participants choosing a smart meter will somehow be shielded from similar future elevated costs, should they arise.

3.7 If MCP participants who choose to retain their analogue meters are to be charged fees every month on the basis that their customer group must cover all costs associated with the MCP analogue meter part of the program, please confirm that they will not in addition also be charged in future a share of the inevitable increased liability costs, program cost overruns, accelerated smart meter replacement costs and so on that will in five to ten years likely face the larger residential and business smart meter customer groups.

3.8 Please confirm that if such a practice described in the previous IR were to occur in future, it would constitute double billing of those customer group members that have explicitly chosen to dissociate

themselves (in every way permitted to them) from all the approaching negative aspects of the smart meter program being imposed.

3.9 If the Applicant declines to explicitly confirm that BCH will never practice such double billing of MCP analogue meter customer group members, for costs arising from both the program they have elected or are deemed to have elected to join, PLUS a share of the costs of the smart meter program with its presently unacknowledged (but likely) attendant financial, legal, medical and ethical risks and liabilities, then please clearly explain what steps BCH requires customers faced with this situation to take (other than terminating their contract with BCH and arranging disconnection), in order for them to be financially and legally free from being liable for any and all possible future costs that BCH charges its smart meter equipped customers for THEIR customer group costs.

3.10 If BCH has not explained in response to the last IR what steps (as above) customers must take in order to SOLELY be responsible for their own customer group's costs (i.e. those costs directly arising from being equipped with an analogue meter, maintaining and replacing it as necessary, having it read as infrequently as is necessary to perform existing normal billing functions, and so on), then please now confirm that there is actually no substantive intention on the part of BCH for a customer group to cover the costs associated with only the services it is receiving, as was claimed by BCH in the Application. This issue seems central to much of the discussion about the 'choices' that BCH is proposing, so consequently what is sought in this IR goes well beyond merely yet another reference to another IR response elsewhere among BCH's responses, that does not actually address the intent, the substance or the specific issues raised in this and the preceding IR.