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British Columbia Utilities Commission
Sixth Floor, 900 Howe Street, Box 250
Vancouver, BC, V6Z 2N3
Attn: Erica Hamilton, Commission Secretary
By Web Posting

Dear Madam:

Re: BC Hydro Application Approval of Charges Related to Meter Choices Program
Project No. 3698760; Exhibit A-18; Supplemental Evidence; BCSEA-SCBC submissions

These are the submissions of the intervenors B.C. Sustainable Energy Association and Sierra Club of British Columbia in accordance with the timetable set out in the Commission's letter of February 24, 2014 [Exhibit A-18]. In Exhibit A-18, the Commission Panel put several information requests to BC Hydro, to which BC Hydro provided responses on March 3, 2014 [Exhibit B-14 and B-14-1¹]. BC Hydro filed submissions on March 6, 2014.

Notably, final written submissions by BC Hydro and the intervenors were already complete at the time of the Panel's information request to BC Hydro. In Exhibit A-18, the Panel emphasizes the narrow scope of the present round of submissions:

Parties are requested to ensure their submissions only address items that are within the scope of the issues canvassed in the questions and the responses to these questions.²

BCSEA-SCBC make the following submissions:

1. With reference to BC Hydro's paragraph 4, BC Hydro's responses to Panel IRs 1.1.3 and 1.1.3.2 are consistent with BCSEA-SCBC's understanding of the previously filed evidence. BCSEA-SCBC have no supplemental submissions.
2. With reference to BC Hydro's paragraph 11, BC Hydro's responses to Panel IR 1.1.4 are consistent with BCSEA-SCBC's understanding of the previously filed evidence. BCSEA-SCBC have no supplemental submissions.
3. With reference to BC Hydro's paragraphs 17 to 19, BC Hydro's responses to Panel IRs 1.6.1 to 1.6.5 provide new evidence of the cost of producing a radio-off meter for installation at the premises of a customer electing radio-off service. BCSEA-SCBC take no issue with BC Hydro's summary of the new evidence. The new evidence is that the cost to convert a smart

¹ BCSEA-SCBC are not privy to Exhibit B-14-1, which was filed confidentially.

² Exhibit A-18, p.1.

meter to a radio-off meter would fall within the range of \$16.53 to \$26.91 per radio-off meter. The previous evidence was a BC Hydro estimate of \$26.91 per radio-off meter.

4. The size of BC Hydro's proposed "initial charge" for customers choosing the radio-off option is based on the earlier estimate of \$26.91 per radio-off meter. In its March 6, 2014 submissions BC Hydro does not propose any change to the requested size of the fees as a result of the new evidence.
5. In their February 7, 2014 final submission, BCSEA-SCBC supported approval of permanent and final Meter Choice rates subject to, of relevance here, the proviso that there should be no "initial charge" for the radio-off option.³ They proposed that the incremental costs of setting up a radio-off meter should be recovered through the monthly charge for the radio-off service. The new evidence does not change BCSEA-SCBC's position in those respects.
6. However, BCSEA-SCBC do submit that the incremental costs of the radio-off service should be adjusted downward as a result of the new evidence. This would be reflected either in a somewhat reduced monthly charge for the radio-off service in the 'no-initial-charge' approach BCSEA-SCBC support or in a reduction of the radio-off initial charge if the Commission approves a radio-off initial charge.
7. As to where within the range of \$16.53 to \$26.91 per radio-off meter the determination should fall, BCSEA-SCBC would support a determination at the bottom end of the range. The \$16.53 per radio-meter is BC Hydro's estimate of its cost of deactivating a batch of 500 meters specially ordered with the Carbon firmware installed to facilitate deactivation of the radio components. That is a reasonable basis for estimating BC Hydro's costs, particularly in the absence of a specific estimate from BC Hydro.

All the above is respectfully submitted.

Yours truly,

William J. Andrews



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cc. Meter Choices proceeding email list

³ BCSEA-SCBC February 7, 2014, final submission, paras. 23(a) and 25 to 33.