



IN THE MATTER OF

BRITISH COLUMBIA HYDRO AND POWER AUTHORITY

APPLICATION FOR APPROVAL OF CHARGES
RELATED TO THE METER CHOICES PROGRAM

DECISION

April 25, 2014

Before:

**L.F. Kelsey, Commissioner
N.E. MacMurchy, Commissioner
D.M. Morton, Commissioner**

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EXECUTIVE SUMMARY

The Meter Choices Program (Program) was announced by the Provincial Government in July 2013. On September 25, 2013, BC Regulation 203/2013 (Direction No. 4) came into force, which provides directions to the British Columbia Utilities Commission (Commission) in its setting of rates for the British Columbia Hydro and Power Authority (BC Hydro). Direction No. 4 requires the Commission to ensure that BC Hydro's rates allow it to collect sufficient revenue in each fiscal year to enable it to recover from the customers who participate in the Program the additional costs attributable to the choice of meter made by those customers.

In addition to providing direction to the Commission with respect to implementing the Government Policy to offer new meter options and related services to eligible customers, the Commission was required to issue an order within 30 days of the issuance of Direction No. 4, that is, by October 25, 2013, to amend the Electric Tariff of BC Hydro in accordance with the provisions set out in the Appendix of Direction No. 4.

Accordingly, in the Application, BC Hydro sought approval from the Commission for new standard charges, changes to the Electric Tariff terms and conditions, and regulatory accounting treatment of certain costs. Following receipt of that Application, the Commission issued Order G-166-13 dated October 9, 2013, approving the new terms and conditions in sections 4 and 6 of the Electric Tariff and related changes to the Electric Tariff, effective October 25, 2013, as required by Direction No. 4. In addition, the Order approved: (i) the proposed Failed Installation Charge on an interim and refundable basis effective October 25, 2013; and (ii) adding the costs as described in Direction No. 4 section 3(2) incurred during the period of January 1, 2013 to March 31, 2014 to BC Hydro's existing Smart Meter Infrastructure Regulatory Account.

To review the charges to Program customers proposed by BC Hydro, the Commission issued Order G-167-13, establishing a written public hearing process and setting out a Regulatory Timetable. In addition, Order G 167-13 directs that:

- the proposed charges to be applied to customers that have a legacy meter installed at their premises are set on an interim and refundable basis, effective December 2, 2013; and

- the proposed charges to be applied to customers that have a radio-off meter installed at their premises are set on an interim and refundable basis, effective April 1, 2014.

There was broad public interest in the proceeding with 35 parties registered as Interveners, 152 individuals registered as Interested Parties and 1,109 individuals who filed one or more Letters of Comment.

As a result of the prescriptive nature of Direction No. 4, the issues within scope in this public hearing are very narrow. They are limited to whether the proposed charges would enable BC Hydro to recover expenditures that are considered program costs, investigation costs and infrastructure costs to the extent that BC Hydro requests their recovery and the amount of the failed installation charge.

Interveners, Interested Parties and Letters of Comment raised many issues that were outside the scope of the hearing. While the Commission appreciates the thought, consideration and concern behind these submissions, where they are out of scope the prescriptive nature of Direction No. 4 precludes the Commission from addressing these issues in the decision.

Summary of Findings

The findings of the Commission Panel on charges are summarized in the tables below.

BC Hydro proposes that a \$55.00 exit charge be included in the Initial Charge to pay for the cost of replacing a legacy meter or a radio-off meter with a smart meter when the Program customer moves or opts to leave the Program. The Commission does not approve the inclusion of this cost in the Initial Charge, but approves a \$55.00 charge to be payable at the actual time a Program radio-off meter customer moves or opts to leave the Program. Accordingly, the tables below explicitly show the charges payable upon moving and the charges (if any) payable upon exiting the Program.

Table A shows the approved Initial Charge, the Monthly Charge and the charge upon exiting the Program and accepting a smart meter.

TABLE A: Initial, Monthly and Exit Charges

Meter Choice	Legacy Meter		Radio-off Meter	
	BC Hydro Proposed	Approved	BC Hydro Proposed	Approved
Initial Charge (\$)	0	0	100	22.60
Monthly Charge (\$)	35.00	32.40	20.00	20.00
Charge upon Exiting the Program and accepting a smart meter (\$)	0	0	Included in the Initial Charge proposed by BC Hydro	55

Table B shows the approved charges for customers who are enrolled in the Program and subsequently move to a new premises. Direction No. 4 states that a customer with a legacy meter who moves cannot retain or have installed a legacy meter at the new premises. However, they may elect to have a radio-off meter installed at the new premises.

TABLE B: Moving Charges

Meter type prior to moving	Legacy Meter		Radio-off Meter	
	BC Hydro Proposed	Approved	BC Hydro Proposed	Approved
Charge upon moving (\$)	100	77.60	155	132.60

The Commission approves the proposed failed installation charge of \$65.00.

This Decision is divided into five sections. Section 1 is an introductory section setting out the background, process, scope and legislative framework. Section 2 addresses issues impact specific Meter Choices program costs determinations. Section 3 addresses the specific Meter Choices Program costs forecast by BC Hydro. Section 4 addresses the proposed charges arising from these costs. Section 5 addresses other issues arising in this Application.

1.0 INTRODUCTION

1.1 Background

The Meter Choices Program (Program) was announced by the Provincial Government in July 2013. On September 25, 2013, BC Regulation 203/2013 (Direction No. 4) came into force, which provides directions to the British Columbia Utilities Commission (Commission, BCUC) in its setting of rates for the British Columbia Hydro and Power Authority (BC Hydro). Direction No. 4 requires the Commission to ensure that BC Hydro's rates allow it to collect sufficient revenue in each fiscal year to enable it to recover from the customers who participate in the Program the additional costs attributable to the choice of meter made by those customers.

1.2 The Application

On October 7, 2013, BC Hydro filed, pursuant to sections 58 to 61 of the *Utilities Commission Act* (UCA)¹ and Direction No. 4, an Application for Approval of Charges Related to Meter Choices Program (Application).

Section 3(3) of Direction No. 4 specifically required the Commission to issue an order within 30 days of the issuance of Direction No. 4, that is, by October 25, 2013, amending the Electric Tariff of BC Hydro in accordance with the provisions set out in the Appendix of Direction No. 4.

A copy of Direction No. 4 is included as Appendix A of this Decision.

BC Hydro sought approval from the Commission for new standard charges, changes to the Electric Tariff terms and conditions, and regulatory accounting treatment of certain costs. Upon receipt of the Application, the Commission issued Order G-166-13 dated October 9, 2013 approving the new terms and conditions in sections 4 and 6 of the Electric Tariff and related changes to the Electric Tariff, effective October 25, 2013, as required by Direction No. 4. In addition, the Order approved:

¹ RSBC 1996, c. 473.

(i) the proposed Failed Installation Charge on an interim and refundable basis, effective October 25, 2013; and (ii) adding the costs as described in section 3(2) of Direction No. 4 incurred during the period January 1, 2013 to March 31, 2014 to BC Hydro's existing Smart Metering and Infrastructure (SMI) Regulatory Account.

The standard charges proposed by BC Hydro in the Application are summarized below:

1. Charges specific to the Program (shown in Table 1.1)
2. Charges non-specific to the Program
 - Failed Installation Charge – \$65 per occurrence

TABLE 1.1: Summary of Program Charges Proposed by BC Hydro

	Radio-off Meter		Legacy Meter	Smart Meter
	Existing Meter: Legacy	Existing Meter: Smart ²		
Initial Charge (\$)	100	155	N/A	N/A
Monthly Charge (\$)	35	20	35	N/A

Program eligibility criteria are set out in the Appendix to Direction No. 4. Under the Program, eligible customers³ can choose to: (a) install a standard smart meter; (b) install a radio-off meter; or (c) have the existing legacy meter remain installed at the premises. For those customers in the Program who choose option (b) or (c), or are deemed⁴ to have chosen (c) above, additional charges, as set by the Commission in its final determination on BC Hydro's proposal, will apply.

Customers who already have smart meters installed at their premises or Program customers with a legacy meter who choose a smart meter will not be subject to the new charges sought by BC Hydro in this Application.

² Applicable to eligible customers who have a legacy meter or a radio-off meter, who move to a premises that has a smart meter installed, and elect to have that smart meter replaced with a radio-off meter.

³ Residential customers who did not have a smart meter installed before September 1, 2013.

⁴ Customers with a legacy meter in place on December 1, 2013, who have not notified BC Hydro of their meter choice, are deemed to be legacy meter customers.

Legacy Meter Conditions

Eligible customers who choose, or are deemed to have chosen, the legacy meter option will be able to retain this meter until the Measurement Canada meter seal expires or the meter ceases to function properly, whichever occurs first. If the meter seal expires, or the meter should cease to function properly, BC Hydro will exchange this meter with a replacement legacy meter as long as BC Hydro has a suitable meter in its inventory. Customers with a legacy meter can choose a smart meter or a radio-off meter (with the applicable Initial Charge) at any time. If a customer with a legacy meter in place moves to another premises, the customer will not be permitted to have a legacy meter installed at the new premises. The customer may choose to have a radio-off meter installed at the new premises or accept a smart meter.

BC Hydro proposes, in accordance with Direction No. 4, that the charges for having a legacy meter become effective December 2, 2013 (Exhibit B-1, p. 2-7).

Radio-off Meter Conditions

Eligible customers who choose the radio-off meter option will be able to retain this meter indefinitely.

BC Hydro states that deployment of radio-off meters is expected to be substantially completed by April 2014, and proposed that the charges for having a radio-off meter installed become effective April 1, 2014 (Exhibit B-1, p. 2-8).

1.3 Regulatory Process

Order G-167-13 established the proceeding as a written public hearing process and set a Regulatory Timetable which allowed for the registration of Interveners who wished to actively participate and Interested Parties who have an interest in the proceeding.

BC Hydro published a notice of the public hearing, as directed by Order G-167-13, in three major newspapers in the province on October 17, 2013. Order G-167-13 further directed BC Hydro to

distribute Order G-167-13 and attached appendices to Registered Interveners and Interested Parties in its F2012-2014 revenue requirements application proceeding, which was BC Hydro's most recent major proceeding before the Commission. The Regulatory Timetable included two rounds of Information Requests (IRs) scheduled to take place from November 6, 2013 to December 16, 2013 and an argument phase scheduled to begin on December 20, 2013 and to end with a Reply Submission from BC Hydro on January 13, 2014.

In addition, Order G-167-13 directed that:

- The proposed charges to be applied to customers that have a legacy meter installed at their premises are set on an interim and refundable basis, effective December 2, 2013.
- The proposed charges to be applied to customers that have a radio-off meter installed at this premises are set at an interim and refundable basis, effective April 1, 2014.

Thirty-five parties registered as Interveners. Ten Interveners participated in two rounds of IRs while another five Interveners participated in only one round of IRs. One hundred and fifty-two individuals registered as Interested Parties and 1,109 individuals filed one or more Letters of Comment.

BC Hydro received more than 800 questions in the first round of IRs. By letter to the Commission on November 14, 2013 (Exhibit B-4), BC Hydro requested an extension to the response date on the ground that it did not believe it would be able to meet the filing date given the number of IRs and short period of time allotted. Following a round of Intervener submissions, by Order G-186-13 dated November 18, 2013, the Commission established an Amended Regulatory Timetable allowing the extension and set January 17, 2014 as the filing date for BC Hydro's response to the second round of IRs and the period January 24, 2014 to February 14, 2014 as the argument phase. A copy of the Amended Regulatory Timetable is included in Appendix B to this document.

In the course of filing submissions on the BC Hydro extension request, the majority of Interveners who filed submissions indicated that they would only agree to BC Hydro's request with conditions; those conditions being the variation of the imposition of interim charges as approved by Order

G-167-13. By Order G-186-13 the Commission granted BC Hydro's request in part and determined that it was not prepared to vary the amount of the interim fee.

Order G-167-13 was the subject of a reconsideration application. By Order G-50-14 dated March 28, 2014, the Panel denied the reconsideration.

In the course of this proceeding, two additional motions were filed by Interveners:

1. Mr. Wong and the B.C. Sustainable Energy Association and the Sierra Club of B.C. (BCSEA) requested the Commission to direct BC Hydro to provide the response to questions which BC Hydro declined to answer in IR No. 1 related to Program enrolment that ended on December 1, 2013. The motion resulted in a letter from the Commission to BC Hydro and BC Hydro providing the information by the date requested (Exhibit B-8).
2. Citizens for Safe Technology Society (CSTS) and Nomi Davis requested the Commission to direct BC Hydro to provide information on CSTS IR No. 1 which BC Hydro had declined to answer (Exhibit C4-6). By letter dated January 12, 2014, the Commission directed the parties to reach an agreement as to which of the questions are in scope and then inform the Commission; the Commission would then consider CSTS' request in the event that an agreement failed. This motion resulted in a letter from the Commission which contains Commission findings that, among other things, identifies issues which are out of scope for the proceeding. These include issues related to (a) eligibility requirements for participation in the Program; (b) retaining legacy meters; and (c) data from other jurisdictions on fees in opt-out programs (Exhibit A-14).

By letter dated February 24, 2014, the Commission Panel issued Panel IRs to BC Hydro for further clarification of some issues. This IR process allowed for BC Hydro to respond by March 3, 2014, provided for another round of submissions from all parties restricted to this new evidence and a reply from BC Hydro by March 18, 2014.

The Exhibit List of the proceeding is included in Appendix C to the Decision.

1.4 Scope

Due to the prescriptive nature of Direction No. 4 the scope of this hearing is very narrow. In scoping the proceeding the Panel considered the wording of section 3(1) of Direction No. 4, which states:

In setting rates under the Act for the authority, the commission must ensure that the rates allow the authority to collect sufficient revenue in each fiscal year to enable it to recover the following costs from the following customers:

- (a) program costs, investigation costs and infrastructure costs from
 - (i) applicable customers at applicable premises where a legacy meter or radio-off meter is installed, to the extent that the authority requests recovery of any of those costs from these customers, and
 - (ii) all customers to the extent that any of those costs are not recovered under subparagraph (i);
- (b) from all customers, costs incurred with respect to the installation and operation of, and services related to, smart meters;
- (c) failed installation costs from customers at a premises, where a failed installation occurred.

As a result of the prescriptive nature of Direction No. 4, the only issues within scope in this proceeding are whether the proposed charges shown in Table 1.1 enable BC Hydro to recover expenditures that are considered program costs, investigation costs and infrastructure costs to the extent that BC Hydro requests their recovery and the amount of the failed installation charge.

Directive 4 of Order G-167-13 advised parties of the limited scope of the proceeding:

“In reviewing the Application for Approval of Charges Related to Meter Choices Program, the written hearing is limited in scope to the recovery of costs of providing services to customers in relation to their choice of meters. Direction No. 4, section 4 establishes limits on the Commission’s powers to review the Application.”

In the Commission’s February 3, 2014 letter (Exhibit A-14), parties were again reminded of the limited scope of the proceeding. Further, the Panel considered that its determinations on the unanswered CSTS IRs might be useful in assisting Interveners in understanding the scope of this

proceeding as they prepared their Final Submissions. In the letter, the Commission states that the following issues are not within scope:

- the Commission's discretion to alter the eligibility requirements for the Meter Choices Program of customers who already have smart meters installed;
- whether customers should be allowed to continue to have legacy meters despite moving residences; and
- the cost of opt-out fees charged in other jurisdictions. (Exhibit A-14)

Intervenors, Interested Parties and persons filing Letters of Comment still raised issues that are outside the scope of the hearing. While the Commission appreciates the thought, consideration and concern behind these submissions, where they are out of scope the prescriptive nature of Direction No. 4 precludes the Commission from addressing these issues in the Decision. Issues raised include:

1. Inclusion/exclusion of specific costs:
 - Rates should only include a subset of the costs included in the application. For example, that a radio-off meter installed at their premises should reflect only the time involved in switching the smart meter to a radio-off meter; or that the monthly fee should not include the costs of range extenders.
 - Costs resulting from the exclusion of various customers from being eligible to participate in the meter choices program, which are referred to by the party as 'the Exclusion Costs'.
 - Costs that BC Hydro has not requested to be included for recovery.
2. Other reasons for establishing Program participation and Program related charges:
 - The customers who would have liked to have joined the Program but were not given an option at the time a smart meter was installed at their premises.
 - The Commission's discretion to alter the eligibility requirements for the Program.
3. An affirmation that the Commission's order is limited to the implementation of Direction No. 4 in accordance with section 3 of the UCA and that the Commission, in making its order, makes no determination with respect to application of any other statute or common law principle to the BC Hydro smart meter program.
4. Costs based on hypothetical circumstances that are inconsistent with Direction No. 4.
5. Proposals based on evidence introduced in Final Submissions.

6. Maintaining a legacy meter inventory.
7. Circumstances triggering the failed installation charge.
8. Affordability of the proposed charges.
9. Quantum of the Program charges relative to current consumption bill.
10. Municipalities providing contract meter reading services to BC Hydro.
11. Privacy, health and safety issues.
12. The 'smart meter' program was exempt from a full review.
13. Charges in other jurisdictions' opt-out programs.
14. Whether BC Hydro's charges are set to discourage legacy and radio-off meters and encourage the change to smart meters.
15. Disagreement with and criticism of Direction No. 4.
16. Whether customers should be allowed to continue to have legacy meters despite moving residences.

While the Panel notes that BC Hydro provided submissions on some of these issues, for the reasons set out above, the Panel considers only the following issues to be within scope for the purposes of the proceeding:

1. Whether BC Hydro's forecasts of incremental costs are reasonable including:
 - a. forecast program costs of legacy meters or radio-off meters at applicable premises, including costs related to (a) computer hardware and software systems respecting the use and operation of legacy meters or radio-off meters, (b) the conversion of smart meters to radio-off meters for Program customers and radio-off meters into smart meters for future customers, and (c) attendance at an applicable premises to install a legacy meter or radio-off meter;
 - b. forecast infrastructure costs related to the installation and operation of communications infrastructure in areas where the installation of legacy meters or radio-off meters hinders the transmission of information among smart meters; and
 - c. forecast investigation costs related to investigating and identifying the location of unmetered loads as referred to in the Smart Meter and Smart Grid (SMSG) Regulation, in areas where the installation of legacy meters reduces the accuracy of electricity balance analyses performed to estimate the extent and location of these loads.

2. Whether the costs within the Program are appropriately allocated between customers who choose legacy meters and customers who choose radio-off meters.
3. Whether the incremental costs identified as Program costs are appropriately allocated between customers in the Program and the rest of BC Hydro's customers.
4. The reasonableness of the proposed charge per visit due to failed installation of meters as a result of an obstruction at the customer's premises.

1.5 Legislative Framework

In addition to Direction No. 4, but as limited by section 3 of the UCA, sections 58–61 of the UCA prescribe the Commission's rate setting powers. Further, the SMSG Regulation, which was issued under the *Clean Energy Act*⁵ as described below, has influenced the Program.

Direction No. 4

Direction No. 4 includes the following definitions:

legacy meter means an electricity meter, other than a smart meter or a radio-off meter, that is of a type in use by the authority.

radio-off meter means a smart meter adjusted so that the meter's components that transmit data by radio are deactivated.

smart meter means a meter that

- (a) meets the requirements set out in section 2 of the Smart Meters and Smart Grid Regulation, B.C. Reg. 368/2010, and
- (b) has components that transmit data by radio and those components are activated.

Direction No. 4 was issued to the Commission under section 3 of the UCA. Direction No. 4 contains provisions on a number of actions that the Commission must carry out as well as powers that the Commission must refrain from exercising when setting rates for BC Hydro. All the provisions regarding rate-setting are included in section 3 of Direction No. 4.

⁵ SBC 2010, c. 22

Section 3(3) of Direction No. 4 requires the Commission, within 30 days of the date that the direction comes into force, to issue an order amending BC Hydro's Electric Tariff by adding the provisions set out in the Appendix to the direction. The Appendix contains the Electric Tariff terms and conditions related to conditions for retention or installation of legacy meters and radio-off meters, and the respective periods during which the legacy meters and radio-off meters may remain in place.

Section 4(1) of Direction No. 4 prohibits the Commission from exercising “a power under the [UCA] that would directly or indirectly prevent [BC Hydro] from installing, operating or providing services in respect of legacy meters, smart meters and radio-off meters.” [Emphasis added.]

Section 4(2) of Direction No. 4 prohibits the Commission from requiring BC Hydro to install a legacy meter or radio-off meter for non-residential customers and for “applicable customers” where a smart meter has been installed at “applicable premises” on or after the date the direction comes into force.

Utilities Commission Act, section 3 and sections 58–61

Section 3 of the UCA requires the Commission to comply with directions issued to it by the Lieutenant Governor in Council by regulation, subject to certain exceptions in section 3(3) which are not relevant to this application.

Section 3(1) and (2) of the UCA state:

3(1) Subject to subsection (3), the Lieutenant Governor in Council, by regulation, may issue a direction to the commission with respect to the exercise of the powers and the performance of the duties of the commission, including, without limitation, a direction requiring the commission to exercise a power or perform a duty, or to refrain from doing either, as specified in the regulation.

(2) The commission must comply with a direction issued under subsection (1), despite

(a) any other provision of

(i) this Act, except subsection (3) of this section, or

(ii) the regulations,

- (a.1) any provision of the Clean Energy Act or the regulations under that Act,
- or
- (b) any previous decision of the commission.

The UCA defines a rate to include:

- (a) a general, individual or joint rate, fare, toll, charge, rental or other compensation of a public utility,
- (b) a rule, practice, measurement, classification or contract of a public utility or corporation relating to a rate, and
- (c) a schedule or tariff respecting a rate.

Sections 58–61 of the UCA contain provisions with respect to the Commission’s rate setting powers and the filing of rate schedules. Whereas the Commission is given discretionary power in determining just and reasonable rates, that discretion is not without limits. For example, section 59(5) defines a rate as “unjust” or “unreasonable” if the rate is:

- (a) more than a fair and reasonable charge for service of the nature and quality provided by the utility,
- (b) insufficient to yield a fair and reasonable compensation for the service provided by the utility, or a fair and reasonable return on the appraised value of its property, or
- (c) unjust and unreasonable for any other reason.

In addition, pursuant to section 60(1)(b), in setting a rate under the UCA:

the commission must have due regard to the setting of a rate that

- (i) is not unjust or unreasonable within the meaning of section 59,
- (ii) provides to the public utility for which the rate is set a fair and reasonable return on any expenditure made by it to reduce energy demands, and
- (iii) encourages public utilities to increase efficiency, reduce costs and enhance performance.

As noted above, Direction No. 4 was issued under section 3 of the UCA. Therefore, by virtue of sections 3(1) and 3(2) of the UCA, the provisions of Direction No. 4 take precedence over all provisions of the UCA relating to the matters to which Direction No. 4 applies.

Direction No. 4 and sections 58–61 of the UCA provide the jurisdictional basis for the determinations the Panel must make on the Application.

The *Clean Energy Act* and the Smart Meter and Smart Grid Regulation

Direction No. 4 refers to the Smart Meter and Smart Grid (SMSG) Regulation in defining the terms “investigation cost” and “smart meter”. The SMSG Regulation was issued pursuant to the *Clean Energy Act*. The SMSG Regulation also requires that a smart grid program must be established to enable BC Hydro to perform, among other things, electricity balance analyses for the electric distribution system by the end of calendar 2015. The term “electricity balance analysis” in Direction No. 4 is given the same meaning as in the SMSG Regulation.

2.0 ISSUES ARISING THAT IMPACT SPECIFIC COST DETERMINATIONS

2.1 Weighting Costs by Geographical Region

The Commercial Energy Consumers Association of British Columbia (CEC) submits that the evidence shows customers in Vancouver and the Lower Mainland are disproportionately less likely to refuse smart meters while customers on Vancouver Island and Salt Spring Island are disproportionately more likely to refuse smart meters. CEC cites as an example that Lower Mainland communities constitute over 55 percent of the total number of residential customers, and only 29 percent of the “refusing” customers. It submits that such geographic disparity is likely not reflected in the \$55 fee used as a proxy by BC Hydro in several of its calculations and argues that this should instead be \$61. CEC also recommends that the Commission “direct BC Hydro to recalculate the cost of meter reading taking into consideration the increased costs related to the geographic dispersion of customers” (CEC Final Submission, p. 12).

In its reply argument BC Hydro states that “the CEC provides opinions based on the evidence with respect to certain cost categories where the costs could be higher than BC Hydro has forecast. The CEC properly supports and qualifies its opinions and, therefore, BC Hydro does not dispute those CEC submissions...” (BC Hydro Reply Submission, p. 9).

Commission Determination

The Commission Panel notes that BC Hydro does not dispute CEC's submissions but it has not put forward any alternative approach to calculating Program costs.

Although the Panel observes that the evidence shows there may be a disproportionate geographical distribution of participants, we find there is insufficient evidence to determine what, if any, affect this disproportionate geographical distribution has on the costs as proposed by BC Hydro to be recovered from Program customers. Accordingly, the Panel declines to make any adjustment to the proposed costs based on geographical distribution.

2.2 Postage Stamp Principles

BC Hydro proposes to apply charges "on a postage stamp basis across its service territory" (Exhibit B-6-1, CSTS IR 1.40). Accordingly, charges will not vary by the geographic location of the Program customer, the proximity of the customer to other Program customers, or by the proximity of the Program customer to areas where there is currently no field area network or wide area network coverage for smart meter telecommunications. BC Hydro states that this is similar to other BC Hydro charges wherein total costs to provide the service are divided by the appropriate number of units, in this case, the number of Program customers forecast to choose the particular option. (BC Hydro Final Submission, p. 6)

In cases wherein costs may be lower due to a higher density of participants, BC Hydro states that reduced costs will be reflected in total costs and shared by all customers participating in the Program (Exhibit B-6-1, CSTS IR 1.40).

2.2.1 Intervener Positions

BCSEA submits that the postage-stamp concept should apply to the Program charges. It asserts that the "rates [charges] should be the same regardless of a customer's location within the BC Hydro service territory" (BCSEA Final Submission, p. 7).

Commission Determination

The Panel finds no compelling reason why BC Hydro should depart from the postage stamp principle when recovering costs from Program customers. **Accordingly the Panel directs that the charges should be applied on a postage stamp basis to customers in the Program.**

2.3 Number of Program Customers

BC Hydro estimates the range of customers that choose either a radio-off or legacy meter to fall between 5,000 and 20,000 and proposes charges aligned to approximately 10,000 customers choosing either of these options (Exhibit B-1, p. 3-4).

The updated Program enrolment data as at December 13, 2013 indicates that 450 eligible customers had chosen a radio-off meter, 2,254 eligible customers had chosen a legacy meter and 13,112 eligible customers had not responded and were deemed to have chosen a legacy meter (Exhibit B-8). In that filing, BC Hydro states that it expects a continued decline in the number of “deemed” legacy meter customers. BC Hydro further updated the Program participation as at January 10, 2014. That update indicates that 450 eligible customers had chosen a radio-off meter, 2,750 eligible customers had chosen a legacy meter and 12,374 eligible customers had not responded and were deemed to have chosen a legacy meter (Exhibit B-10, BCUC IR 2.25.2).

In response to a BCUC IR, BC Hydro states:

“The number of customers ‘deemed’ to have chosen a legacy meter will continue to decline while the number of customers choosing the radio-off meter will increase to a peak and then decrease as overall participation in the Meter Choices Program declines. This pattern is a result of the conditions under which eligible customers may retain legacy and radio-off meters at their premises in accordance with the BC Hydro Electric Tariff.” (Exhibit B-10, BCUC IR 2.25.2)

The legacy meter conditions provide that the customer will be able to retain a legacy meter until the Measurement Canada meter seal expires or the meter ceases to function properly, whichever happens first. If the meter seal expires, or the meter should cease to function properly, BC Hydro will exchange this meter with a replacement legacy meter as long as BC Hydro has a suitable meter

in its inventory. BC Hydro has a limited number of spare legacy meters in its inventory and depending on the number of customers who ultimately choose the legacy meter option it will exhaust this inventory over the next several years. The response to BCUC IR 2.25.1 in tabular form shown in Table 2.1 illustrates the estimated time to exhaust the inventory of legacy meters for five scenarios ranging from 2,500 to 15,000 legacy meter customers.

TABLE 2.1: Five Scenarios on Replacement of Legacy Meters

Year	Percent Seal Expiry (%)	Meter Exchanges				
		2,500	5,000	7,500	10,000	15,000
		Legacy Meter Customers	Legacy Meter Customers	Legacy Meter Customers	Legacy Meter Customers	Legacy Meter Customers
2014	53.5	1,338	2,677	4,015	5,354	7,501
2015	7.7	191	383	574	765	0
2016	12.0	301	602	903	0	0
2017	1.7	43	87	0	0	0
2018	18.0	449	531	0	0	0
2019	2.7	69	0	0	0	0
2020	3.2	0	0	0	0	0
2021	1.1	0	0	0	0	0
	100.0					

(Source: Exhibit B-10, BCUC IR 2.25.1)

BC Hydro does not believe that a departure from the assumption of a 50:50 split between legacy meters and radio-off meters and the assumption of 10,000 Program participants would be warranted. BC Hydro, while providing costs for a range of program participation generally focusses its calculations of charges on this assumption.

According to BC Hydro, the reasons for adhering to the assumptions used in the Application are:

1. It is expected that a considerable number of eligible customers who have not yet responded will choose a smart meter once they receive a bill with the charge and realize that they are “deemed” legacy meter customers.
2. Those “deemed” legacy meter customers who indicated that they wished to keep the legacy meter at no cost will chose the radio-off option or the smart meter option when they receive their bill with the charges associated with the legacy meter options and are faced with an economic decision based on actual alternatives offered.

3. A legacy meter customer who moves premises is only eligible to have a smart meter or radio-off meter and therefore, over time the number of legacy meters will decline and radio-off meters will proportionately increase.
4. The number of legacy meters remaining in service will decrease over time as the Measurement Canada seals expire and the inventory of legacy meters is exhausted. Some of the customers with these meters will choose a radio-off meter as a replacement, resulting in a decline in legacy meters and a proportionately increase in radio-off meters.
(Exhibit B-5, BCUC IR 2.25.2)

BC Hydro submits that there will necessarily be a point in time when there will be 10,000 Program participants and there will also be a point in time when the split between legacy and radio-off meters is 50:50 (BC Hydro Final Submission, pp. 12–13).

In determining the proposed charges for the Program, costs that are common to both the radio-off and legacy meter options (e.g., information technology) have been split based on the assumed ratio of customers choosing each option (i.e., 50 percent radio-off meters and 50 percent legacy meters) and have been allocated accordingly. In instances where costs are attributable to the legacy meter choice these costs have been fully allocated to this option. (Exhibit B-1, pp. 3-5, 3-6)

2.3.1 Intervener Positions

BCSEA supports the assumption of 10,000 participants for the purpose of calculating the charges (BCSEA Final Submission, para. 36).

CEC recommends that the Commission utilize the best evidence, which is that there are likely to be approximately 5,000 Program customers by the end of year three. It considers that BC Hydro's estimation of 0.6 percent participation is too high. In its view, the range of 0.2 percent to 0.3 percent or about 5,000 customers in total is consistent with those jurisdictions where smart meter programs are substantially complete. It notes that Hydro Quebec has similar initial charges as those proposed by BC Hydro and slightly lower monthly rates, and has a participation rate of only 0.2 percent. CEC submits that "the rate of 0.2% or 5,000 customers is the appropriate basis upon

which BC Hydro should establish its participation rates and set cost of service charges accordingly” (CEC Final Submission, p. 7).

CEC suggests establishing rates for 2014 based on BC Hydro’s proposed prediction of 10,000 customers for the 2014 period, and setting pre-established higher annual rates in the order of \$11 or \$12 for each of the next two years for Program legacy meter customers and \$4.50 to \$5.00 for Program radio-off meter customers and recommends that the Commission do so to provide a smooth transition to the most likely cost of the Program. (CEC Final Submission, pp. 7, 10)

Commission Determination

The Panel acknowledges the evolving nature of the Meter Choices Program and accepts that participation in the Program could, over time, vary considerably from the initial assumptions upon which the rates are set. Both the overall number of participants and the proportion of participants selecting legacy meters are likely to change. However, in the immediate term, rate certainty is important to allow customers to make reasoned choices. **Based on the evidence, the Panel finds that the cost calculations should be based on 10,000 customers. The Panel also finds that a 50:50 split between radio-off meter customers and legacy meter customers is a reasonable basis on which to apportion the program costs, unless the cost is attributable to only one of the customer groups.** In that event, the principle of cost causation requires that the cost should be recovered from charges to the customer group that incurred the cost.

3.0 COSTS FOR THE PROGRAM

3.1 IT Systems Modifications

BC Hydro submits that the deployment and operation of radio-off meters and the continued operation of legacy meters will impact a number of BC Hydro’s information technology (IT) systems, including:

- SAP, the application used to manage customer information, meter records and meter work orders.

- Grid Director, the application used to visualize the smart metering network, and perform diagnostics and network optimization activities.
- The Energy Visualization Portal (EVP), which provides customers secure access through the internet to their hourly energy consumption data.
- The Outage Management system, called Power-On.
- The analytics solution for energy theft identification. (Exhibit B-1, p. 3-8)

In addition, reporting changes will be required to suppress radio-off and legacy meters from all non-communicating meter reports, and identify radio-off and legacy meters separately for operating purposes and service level agreements (Exhibit B-1, p. 3-8).

Further, BC Hydro submits that IT systems modifications are required to identify and track the customers participating in the Program as they move to new premises and their eligibility for Program options changes (Exhibit B-14, Commission Panel IR 1.3.1).

BC Hydro identifies the following capital costs associated with these IT changes:

TABLE 3.1: Capital Costs Related to IT Changes

Number of Meter Choices Customers	10,000
Business Analysis	\$224,829
SAP Changes	\$416,827
EVP Changes	\$ 40,320
Grid Director Changes	\$ 40,320
Analytics Changes	\$ 43,992
Reports Changes	\$ 80,640
Testing Effort	\$ 201,430
Integration Effort	\$81,739
Project Management	\$108,480
Total Costs	\$1,238,577

(Source: Exhibit B-5, BCUC IR 1.8.2)

BC Hydro states that the costs identified are all incremental and required to support customers who have opted to either keep their legacy meter or receive a radio-off smart meter. However, IT functionality and support is also required to accommodate the presence of smart meters in areas without backhaul coverage (i.e., smart meters installed at the premises of non- wide area network customers). BC Hydro asserts that this was anticipated during the design and implementation of the SMI Program and that the costs of providing that functionality have already been incurred and are not included in the Program charges. (Exhibit B-14, Commission Panel IR 1.3.1)

IT costs are common to both the radio-off and legacy meter options. As a result, BC Hydro proposes to allocate costs to each option based on the ratio of customers assumed to choose a radio-off meter and to customers assumed to retain their legacy meter. Cost recovery and Program charges are based on amortization of IT costs over a ten-year period, which, BC Hydro submits, is consistent with the amortization period for enterprise applications. (Exhibit B-1, p. 3–9)

In BC Hydro's view, the costs (e.g., business analysis costs) are necessary because of the implications to the business processes and IT systems resulting from the previously unanticipated and ongoing presence of radio-off and legacy meters, and to document any required changes to these business processes and IT systems. BC Hydro has forecast 10,272 person-hours in IT tasks at an average rate of \$120.58 per hour. (Exhibit B-5, BCUC IR 1.8.1, 1.8.2, 1.8.3)

No Intervener commented on the costs of IT Systems Modifications as prescribed under Direction No. 4 or BC Hydro's proposed amortization period.

Commission Determination

Based on the evidence, the Panel accepts BC Hydro's forecast and approves the recovery of these program costs of \$1,238,577 from all Program customers over ten years.

3.2 Meter Reading Handheld Units

BC Hydro states that for radio-off meters, bi-monthly manual meter data downloads will be performed by Field Meter Analysts (FMAs) using a ruggedized tablet computer together with an optical probe. For customers who retain a legacy meter, meter reads will be manually input into the same tablet computer. Each FMA will be assigned a handheld unit. It estimates that 14 handheld units will be required to service 10,000 Program customers. The cost of each handheld unit, software, setup, and optical probe is \$5,804. (Exhibit B-1, p. 3-9; Exhibit B-5, BCUC IR 1.9.7)

TABLE 3.2: Total Costs of Handheld Units

Number of Handhelds Required	14
Cost Per Handheld	\$5,804
Total Cost	\$81,256

(Exhibit B-1, Table 3.9, p. 3-9)

BC Hydro provided an amortization schedule in table 3-15 in Appendix I of the Application.

BC Hydro proposes to amortize the handheld units over a three-year period.

No Intervener commented on the costs of the handheld unit or the proposed amortization period.

Commission Determination

Based on the evidence, the Panel accepts BC Hydro's forecast and approves the recovery of these program costs of \$81,256 from all Program customers over three years.

3.3 Additional Telecom Costs

Depending on meter density, the removal of a meter from the network design (i.e., installing a radio-off meter or by leaving a legacy meter in place) may compromise the network if that particular meter would have served as a critical link in the mesh network. The higher the smart meter density, the less likely an individual meter will be critical to mesh formation since the mesh can reform using a smart meter that is near the meter that was removed. As the smart meter

density decreases, the likelihood of the particular meter being critical to the integrity of the mesh increases. Range extenders are deployed to maintain the integrity of the mesh network, and will typically be installed on BC Hydro poles following a site study to determine their optimal location. (Exhibit B-1, p. 3-11)

BC Hydro submits that the actual number of range extenders required is difficult to predict, and will be dependent on a number of factors including geographic dispersion of radio-off and legacy meter customers (i.e., either evenly distributed or clusters of radio-off or legacy meters) and topography (e.g., density of vegetation, hills, mountains, etc.). BC Hydro prepared estimates in the low, medium and high range. In the medium range, the number of range extenders required ranges from none in dense metropolitan areas, where the average meter density is greater than 2,000 meters per square kilometer to one per each removed meter in areas where the meter density is less than two meters per square kilometer. BC Hydro estimates that these examples represent 20.3 percent and 5.1 percent respectively of its service territory. BC Hydro characterises 56 percent of its service territory as suburban, with a meter density ranging from 60 to 900 meters per square kilometer. These areas will require, on average, one range extender for every 30 meters removed. (Exhibit B-1, p. 3-12)

Based on these requirements, BC Hydro estimates that about 300 to 1,200 range extenders would be needed to preserve the integrity of the mesh network, which corresponds to 5,000 and 20,000 customers participating in the Meter Choices Program, respectively. Assuming 10,000 participants, BC Hydro expects “that about 600 additional range extenders will be required.” (Exhibit B-1, p. 3-12)

BC Hydro expects the cost of one range extender (installed, with all ancillary equipment) to be \$3,028. In addition to the cost of additional range extenders, BC Hydro states that it will incur costs associated with determining the optimal location of these range extenders once the location of radio-off and legacy meters is known (i.e., design engineering and site survey). It estimates the cost of this additional design engineering and site survey at \$500 per range extender. (Exhibit B-1, p. 3-12)

The range extender cost is based on the assumption that the geographic distribution of participants in the Program will be the same as the geographic distribution of all BC Hydro customers across the service area (Exhibit B-5, BCUC IR 1.11.1). BC Hydro summarizes its “medium” range extender estimates in Table 3.3:

TABLE 3.3: Additional Telecom Costs – Medium Scenario

Number of Customers	10,000
Range Extenders Required	609
Total Cost of Design, Installed Range Extenders and Ancillary Equipment	\$2,148,552

BC Hydro states that an accurate assessment of customer density requires a detailed geographic analysis of the location of each customer choosing to participate in the Program and that cannot be reasonably done in the time frame of this proceeding. BC Hydro also states that it would undertake this analysis as part of the telecom optimization efforts once the locations of Program participants have been assessed. (Exhibit B-10, BCUC IR 2.24.2.1)

BC Hydro proposes to amortize the additional telecom over 27 years. It states that this amount is based on weighted average of range extender, transformer, single-phase and three-phase poles. It also confirms that the depreciation calculation is aligned with the approved depreciation policy in the most recent revenue requirement application decision. Table 3.4 shows the expected asset life of the various components. (Exhibit B-5, BCUC IR 1.11.5)

TABLE 3.4: Expected Asset Life in Years

Range Extender	20
Transformer	35
Single-phase Pole	50
Three-phase Pole	50
Weighted Average Asset Life (Years)	27

(Source: Exhibit B-1, Schedule A-7a Additional Telecom Equipment)

3.3.1 Intervener Submissions

When asked by Mr. Wong to “confirm that the majority of the range extenders were installed on BC Hydro poles, but nonetheless 81 percent of them required transformers,” BC Hydro was unable to confirm. It stated that:

“[t]he 81 percent estimate was based on the installations to-date at the time of the Application. Across BC Hydro’s service territory, and as of January 6, 2014, 1,500 of 2,700 (i.e., 56 percent) installed range extenders required the installation of a transformer, and all of these range extenders were installed on poles that are either owned or jointly owned by BC Hydro.” (Exhibit B-11, D. Wong IR 1.2.1)

Commission Determination

The Commission Panel finds the revised evidence of BC Hydro, submitted in response to Mr. Wong’s request for confirmation of the assumption of 81 percent of range extenders requiring transformers, to be persuasive. Accordingly the Panel accepts BC Hydro’s revised estimate of 56 percent. Therefore, the Panel directs that the total cost of \$2,148,552 based on 81 percent of range extenders requiring transformers should be adjusted accordingly. By the Panel’s calculation, this revised cost is \$1,838,711, corresponding to a reduction in cost of \$309,841.

Further, the Panel notes that reducing the number of transformers changes the blended asset life of 27 years. By the Panel’s calculation with the revised estimate of 56 percent the corresponding blended asset life is 26 years.

Accordingly, the Panel accepts these reduced infrastructure costs of \$1,838,711, amortized over a new weighted average asset life of 26 years and approves the recovery of these costs from all Program participants

3.4 Theft Detection

Legacy meters attract discrete costs in the areas of theft detection. BC Hydro states that theft detection relies on electricity balance analysis using interval data collected by smart meters and radio-off meters (in conjunction with event alarms and energy profiles). Legacy meters remaining

in the field will reduce the accuracy of the electricity balance analysis. As a consequence, additional efforts are required to mitigate the impact to theft detection benefits. BC Hydro believes that the most cost effective mitigation approach is the deployment of additional field investigation teams.

3.4.1 Field Investigation Costs

As part of the theft detection solution, these teams place temporary meters (check meters) near premises where theft is suspected to monitor electricity consumption. The check meters cost \$2,000 per unit, and it is anticipated that an additional 300 units will be required (corresponding to 5,000 customers choosing the legacy meter option). Costs of check meters are amortized over a five-year period which is BC Hydro's estimate of their expected life. All associated capital related costs have been allocated to the legacy meter option. (Exhibit B-1, p. 3-10)

In addition to these capital costs, increased resources are required to identify energy theft and other unmetered loads on the system. The costs of incremental resources required to locate theft and other unmetered loads due to legacy meters remaining in service are shown in Table 3.5.

**TABLE 3.5: Additional Resources Required for Theft Detection
Based on 5,000 Legacy Meter Customers**

Number of Field Investigators	2.00
Number of Meter Technicians	1.00
Number of Electrical Contractors	1.00
Analysts Required	1.00
Field Investigator (\$)	271,858
Meter Technician (PLT) (\$)	128,569
Electrical Contractors (\$)	195,000
Analysts (\$)	107,850
Sub-Total (\$)	703,277
Travel and Expenses (\$)	23,000
Check Meter Maintenance (\$)	90,000
Total Annual Costs (\$)	816,277

(Source: Exhibit B-1, Table 3-12)

Total costs for incremental field investigation, assuming that 5,000 customers choose the legacy meter option, are estimated at approximately \$816,000 per year, inclusive of travel and expenses. All incremental field investigation costs have been allocated to the legacy meter option.

3.4.2 Check Meters

Confidentiality Issue

BC Hydro provided the Commission, on a confidential basis, with specific details on the resources and methodologies that it intends to employ to detect theft. Under the Commission's guidelines with respect to confidentiality (Practice Directive of the British Columbia Utilities Commission "Confidential Filings"), the Commission may accept information on a confidential basis where it finds the requesting party's interest in confidentiality outweighs the public interest in the disclosure of the information or documents in the hearing. BC Hydro filed on a confidential basis several responses in Exhibit B-5-1 which were submitted on November 22, 2013 (BCUC IR 1.18.1 and 1.18.1.2). Further confidential responses were filed in Exhibit B-10-1 on January 17, 2014 (BCUC IR 2.33.1.1) and on March 3, 2014 in Exhibit B-14-1 (BCUC Panel IR 1.2.1, 1.2.3, and 1.2.3). The questions that led to confidential responses are set out in Exhibits B-5, B-10 and B-14, which are not confidential.

3.4.3 Intervener Submissions

CSTS states in its Supplementary Submission filed March 13, 2014:

"CSTS opposes the filing in confidence of BC Hydro's responses to BCUC IR 1.2.1, 1.2.2 and 1.2.3. We request that the rationale for this confidential filing be disclosed and that the parties be given an opportunity to make submissions on the propriety of the confidential filing." (Exhibit C4-8, p. 20)

Prior to the March 13, 2014 objection by CSTS, there were no Registered Interveners who objected to confidential filings related to the theft detection program. No Registered Interveners, including CSTS, requested access to confidential responses under the terms of the Practice Directive on Confidential Filings.

3.4.4 BC Hydro Reply

BC Hydro in its March 14, 2014 Supplementary Reply Submission responded to the need for confidentiality by stating:

“Public disclosure of information about BC Hydro's electricity theft detection efforts could compromise the efficacy of those efforts to the detriment of all ratepayers in the form of higher rates.” (Exhibit B-15, p. 3)

BC Hydro also objected to the proposed CSTS process for dealing with the CSTS complaint:

“The CSTS objection to the confidential treatment granted by the BCUC is not timely. The CSTS objection should have been made immediately after BC Hydro submitted the confidential responses to the BCUC on March 3, 2014. If the CSTS had made its objection on a timely basis, the BCUC could have resolved the issue without undue impact to the procedural timetable. However, the CSTS has requested in final argument that the BCUC direct further process to potentially reopen the evidentiary record and take further submissions by all parties. In addition, the CSTS has not availed itself of the procedures outlined in the BCUC confidential filings practice directive.” (Exhibit B-15, p. 4)

Commission Determination on the Confidentiality Issue

The Panel agrees with BC Hydro that the disclosure of the details of the program has the potential to jeopardize BC Hydro's theft detection program and risks higher rates for all customers. As such, disclosure is not appropriate. Therefore, the Panel finds that disclosure is not appropriate in the circumstances. In addition, given that the first confidential responses to questions related to the theft detection program were filed as early as November 2013, with a subsequent confidential filing in January, and with the final confidential responses filed on March 3, 2014, the Panel finds that the objection put forward by CSTS, which was set out in its Supplementary Submission, was not put forward in a timely manner. Paragraph 4 of the Practice Directive on Confidential Filings states:

“A party may object to a request for confidentiality by filing an objection with reasons in a timely manner and serving the objection on the other parties to the hearing and the Commission will give the party claiming confidentiality, together with a person who may be affected by disclosure, an opportunity to reply to an objection.”

For these reasons the Panel denies the CSTS request. To maintain confidentiality, the Commission will issue Confidential Reasons to BC Hydro outlining the details of its findings with respect to the Panel's assessment of the resource requirements to carry out BC Hydro's theft detection program.

Check Meter Requirements

BC Hydro states that it is anticipated that an additional 200 to 500 check meters will be required, corresponding to 2,500 to 10,000 customers choosing the legacy meter option. Assuming 5,000 customers choose the legacy meter option, BC Hydro estimates that it requires 300 additional check meters at a capital cost of \$0.6 million. It proposes to amortize the cost of the check meters over five years. (Exhibit B-1, p. 3-10) This compares to the use of 20 check meters prior to the deployment of smart meters (Exhibit B-5, BCUC IR 1.10.1). However, BC Hydro states that the additional check meters proposed in the Application will be applied using new methodologies, which are the subject of the confidential filing, in addition to the previous approach of using check meters to target individual premises. This will require additional field investigation teams as well as significantly more check meters. (Exhibit B-1, p. 3-10)

While details of the theft detection program are confidential, the basis for the increased need for check meters can be outlined from a general perspective. Prior to installation of smart meters, BC Hydro based its theft detection program on assessment of individual premises where it had come to BC Hydro's attention that electricity theft might be an issue. Field investigation teams placed temporary meters (check meters) near the premises where theft is suspected. This program required 20 check meters.

Intervener Submission

Mr. Stachow believes that going from the use of 20 check meters for 1.9 million accounts to 500 check meters to deal with 10,000 accounts is an example of "padding" costs by BC Hydro (J. Stachow Final Submission).

Commission Determination

In assessing the need for check meters, based on the confidential material provided by BC Hydro, the Panel finds that to obtain the expected theft detection benefits the acquisition of an additional 200 check meters is appropriate, rather than the additional 300 check meters as applied for. This reduces the capital cost of acquiring check meters by \$200,000. This reduction in the number of check meters also reduces annual operating costs by \$30,000.

BC Hydro has set out in the theft detection resources required the need for one meter technician. One meter technician is shown as required throughout the range of meters in use while the number of field investigators, electrical contractors and analysts increase as the level of legacy meter participation increases. According to BC Hydro's evidence, one fulltime meter technician at a cost of \$128,569 per year, is required whether 500 or 200 check meters are required (Exhibit B-1, Table 3-12, p. 3-19). **The Panel finds it unreasonable to conclude that a meter technician who would be fully employed attending to 500 check meters would be similarly fully employed attending to 200 check meters.** Where 200 incremental check meters are utilized allocating 50 percent of a meter technician's time to the theft deterrent program is more appropriate. This reduces the annual operating cost allocated to legacy meters by \$64,284 ($\$128,569 \div 2$). In addition, travel costs are reduced by \$3,626, to account for reduced travel incurred.

The total reduction in theft detection resources (including the reduced number of meters, the reduction in the allocation of meter technician costs and the reduction in the associated travel costs) from the amount applied for is \$97,910 in operating costs and \$200,000 in reduced capital costs. Accordingly, the Panel accepts reduced theft detection operating costs of \$718,367 and approves the recovery of these costs annually from Program customers with legacy meters. **The Panel further accepts reduced theft detection capital costs of \$400,000, and approves the recovery of these costs over five years from Program customers with legacy meters.**

3.5 Radio-off Meter Configuration

BC Hydro currently has an inventory of approximately 50,000 smart meters, all of which have a version of firmware called “Lithium”. The “Lithium” firmware does not allow the radio in the meter to be disabled to become a radio-off meter. A later version of the firmware, called “Carbon” does allow the radio to be disabled. Accordingly, the estimates of meter reconfiguration costs in Table 3.6 include first upgrading the firmware of the meter from “Lithium” to “Carbon”. (Exhibit B-14, Commission Panel IR 1.6.3)

The firmware update required, and then deactivating the radio, will be performed by a Meter and Instrument Technician. The BC Hydro standard labour rate for this resource, including benefits, is currently \$64.59 per hour. BC Hydro estimates that it will take a Meter and Instrument Technician 25 minutes to perform the download. The cost to download the firmware and deactivate the radio is therefore \$26.91 per unit (i.e., 25 minutes ÷ 60 minutes × \$64.59 per hour). (Exhibit B-1, p. 3-14)

The process of turning off the radio was explored further in the Panel IR. In BC Hydro’s responses to Panel IRs 1.6.1 to 1.6.5 (Exhibit B-14), BC Hydro confirmed that the estimated time of 25 minutes and \$26.91 per meter forecast in the Application is based on a “one-off” approach, whereby each meter would be configured by a meter technician sequentially. It further stated that for the 461 customers who requested the radio-off meter option during Program enrolment, the BC Hydro meter shop completed the firmware update and radio deactivation tasks in bulk. Specifically, the update process was completed by two meter technicians, each using a ten position meter board together with a computer (i.e., ten meters were updated simultaneously per technician).

The Commission Panel notes that there are a number of costs that were not identified in the Application, but were included in BC Hydro’s response to the Panel’s IRs, including costs for quality assurance and a meter records clerk.

TABLE 3.6: Radio-off Meter Reconfiguration Costs

	Resource Person Hours	Standard Labour Rate (\$)	Total Cost (\$)	Cost Per Meter (\$)
Meter & Instrument Technician	130	\$64.59	\$8,397	\$18.21
Analyst - Quality Assurance (Group 10)	13	\$56.22	\$731	\$1.59
Meter Records Clerk (Group 7)	30	\$43.02	\$1,291	\$2.80
Total			\$10,418	\$22.60

(Source: Exhibit B-14, Commission Panel IR 1.6.1, 1.6.2)

With regard to obtaining a radio-off meter directly from the supplier, BC Hydro states that “Itron does not manufacture smart meters with the radios deactivated, at least not without a special order and additional cost” (Exhibit B-14, Commission Panel IR 1.6.3). However, it does not identify the additional cost.

BC Hydro further states that smart meters:

“can now be ordered from Itron with the Carbon firmware version installed at no additional cost. However, BC Hydro has not yet completed its testing of these meters to ensure that they meet all specifications (referred to as ‘First Article Approval’). When BC Hydro has completed First Article Approval of such meters, smart meters with the Carbon firmware will be ordered from Itron when additions to inventory are required.” (Exhibit B-14, Commission Panel IR 1.6.3)

BC Hydro indicates that the total time for deactivation of the radios would be reduced by one-third if the meters were delivered with the Carbon firmware preinstalled. Based on a batch size of about 500 meters, BC Hydro estimates the cost to deactivate the radios by the BC Hydro meter shop, assuming the meters were delivered with the Carbon firmware preinstalled, is estimated at \$16.53 per unit (i.e., $\$18.21 \times 2/3 + \$1.59 + 2.80 = \$16.53$). (Exhibit B-14, Commission Panel IR 1.6.3)

However, BC Hydro submits that it is too early to determine whether the “one-off” approach (at \$26.91 per radio-off meter) or the “large batch” approach (at \$22.60 per radio-off meter) will be typical of future radio-off meter production (BC Hydro Supplemental Submission, p. 4).

3.5.1 Intervener Submissions

In its Final Submission, BCSEA submits that there should be no “initial charge” for customers choosing the radio-off meter option, and that BC Hydro’s incremental costs of setting up a radio-off meter should be recovered through the monthly charge for the radio-off service (BCSEA Final Submission, p. 6). In its Supplemental Submission, it argues that the incremental costs of the radio-off service should be adjusted downward as a result of the new evidence, stating that “[t]his would be reflected either in a somewhat reduced monthly charge for the radio-off service in the ‘no-initial-charge’ approach BCSEA support or in a reduction of the radio-off initial charge if the Commission approves a radio-off initial charge” (Exhibit C2-6, BCSEA Supplemental Submission, p. 2).

CEC recommends that the Commission accept BC Hydro’s \$26.91 as the best information from the Applicant currently available for the present circumstances. It submits that it would be premature to refine the cost estimates downward based on the new information because BC Hydro states that it is too early to determine whether the “one-off” approach or “large batch” approach will be more typical in radio-off production, as it will depend on customer requests. CEC further submits that the demand for legacy meters, radio-off meters, and for legacy meters converted to radio-off meters is still unknown and likely to be low, and notes that only about one in seven customers who had been previously held back for ‘other reasons’ as of a few months earlier were deemed to have chosen legacy meters by January 13, 2014. (Exhibit C3-5, CEC Supplemental Submission, p. 3)

Commission Determination

The Panel is of the view that it is prudent for BC Hydro to take a “batch” approach (i.e., ten meters simultaneously) to configuring radio-off meters, as it has done with meters it has configured to date. There appears to be little, if any, reason for a meter technician to configure one meter at a time, particularly as BC Hydro expects many legacy meters to be replaced with radio-off meters as legacy meter inventory is expended. The Panel acknowledges that if demand for radio-off meters slows down, this may necessitate carrying some radio-off meters in inventory. The relatively small size of the batches makes this approach both practical and cost effective.

Accordingly, the Panel accepts a reduced radio-off meter configuration cost of \$22.60 per meter and approves the recovery of this program cost from Program radio-off meter customers.

3.6 Manual Meter Reading

Since a radio-off meter will be unable to communicate with BC Hydro's systems once the radio has been deactivated, an FMA will need to continue to visit the customer's premises every two months to manually download electricity consumption data from radio-off meters using a handheld tablet computer and an optical probe. Similarly, for legacy meters consumption information will need to be manually read and input into the same tablet computer. (Exhibit B-1, p. 3-19)

3.6.1 Cost per Read

BC Hydro proposes that radio-off and legacy meters be read by a contractor under an existing agreement to provide field customer services. It states that in April 2013, under the terms of this agreement, approximately 100,000 meter reads were performed by 76.1 fulltime equivalents and uses this level of productivity as the starting point in its analysis. Since downloading two months of meter data from radio-off meters will take more time than a manual input of cumulative kilowatt hours consumed, for radio-off meter customers BC Hydro has added 0.9 minutes to the average read time implied by the April 2013 productivity figures. The costs are summarized in Table 3.7 below. (Exhibit B-1, p. 3-20)

After these adjustments, BC Hydro calculates the average cost of manual reads for radio-off meters in a range from \$20 to \$39 per download excluding vehicle costs, travel and lodging, and handheld units, based on 10,000 and 2,500 bi-monthly downloads (corresponding to 20,000 and 5,000 Program participants), respectively. For legacy meters, BC Hydro calculates that the average cost ranges from \$18 to \$37 per read. (Exhibit B-1, p. 3-20)

BC Hydro makes a final adjustment to capture meter reading productivity gains "once the number and location of Meter Choices customers and non-WAN customers have reached a 'steady state'." BC Hydro submits that currently, meter routes are largely in flux and expects that "once all manual read endpoints are known, route optimization will lead to higher meter reading

productivity and lower costs.” It expects this productivity improvement to be in the order of 20 percent, and submits that this figure is incorporated into the analysis. (Exhibit B-1, p. 3-20)

TABLE 3.7: Meter Reading Cost – Breakdown

Radio-off Meter	5,000
Legacy Meter	5,000
Total	10,000
Radio-off Meter Reads	
Cost per Read	\$28.05
Vehicle Operating Costs	\$1.49
Travel Costs	\$0.54
Total Meter Reading Cost	\$30.08
Number of Reads per Year	30,000
Total Manual Read Cost per Year	\$902,400
Cost per Read	\$25.87
Vehicle Operating Costs	\$1.49
Travel Costs	\$0.54
Total Meter Reading Cost	\$27.90
Number of Reads per Year	30,000
Total Manual Read Cost per Year	\$837,000
Total Manual Meter Reading Costs	\$1,739,400

(Exhibit B-1, Table 3-13)

Mr. Middleton argues that “The charge to read legacy meters should be set at the same level as the charge to read RF [radio-] off meters” and “the level at which the charge should be set should reflect only the incremental charge represented by the direct costs of hired meter readers and the annual amortization cost of hand held equipment required to record the meter reading” (R. Middleton Final Submission, p. 1).

3.6.2 Vehicle Operating Costs

BC Hydro expects that each FMA will require a vehicle and estimates the average annual operating costs for each vehicle at \$6,600. It bases this estimate on average vehicle operating costs for all similar vehicle types in the BC Hydro fleet. BC Hydro does not seek recovery of capital for vehicles because vehicles currently used by FMAs are fully depreciated. (Exhibit B-1, pp. 3-20, 3-21)

BC Hydro provided a breakdown of the average vehicle costs of \$6,600 into \$3,043 for fuel, \$911 for insurance and \$2,604 for labour maintenance and parts (Exhibit B-5, BCUC IR 1.19.3).

3.6.3 Travel Costs

Travel costs incurred by an FMA when reading meters in remote locations include airfare, ferries, lodging and meals. BC Hydro submits that currently these costs are about \$120,000 per year and a decrease to \$100,000 per year is assumed. It states that these costs “are not expected to change significantly from their current level as the need for manual meter reads decreases over time, since the underlying geographic region is not expected to change materially.” BC Hydro has allocated these costs on a weighted basis to both non-WAN customers and customers choosing to participate in the Program. Accordingly, travel costs are estimated at between \$0.64 per read (based on 5,000 Meter Choices customers) to about \$0.41 per read (based on 20,000 Meter Choices customers). (Exhibit B-1, p. 3-21)

3.6.4 Alternative Approaches

British Columbia Pensioners’ and Seniors’ Organization et al. (BCPSO) submits that there are effectively two other alternatives available to BC Hydro. The first would be a self-reporting⁶ system for meter reading. It submits that BC Hydro already has a system in place for this alternative: some customers currently provide self-reads where on-site meter reading could not take place (BCPSO Final Submission, p. 5).

The second choice is to actually reduce the number of meter reads per year for these customers. For the radio-off meter option, the costs of manual meter reading make up about 76 percent of the total monthly costs. For legacy meters, manual meter reading accounts for about 39 percent of the total monthly costs. Furthermore, in its view, the response to BCUC IR 1.9.6 suggests that these meter reading costs would drop substantially (over 60 percent) if the number of manual reads were reduced to two per year. BCPSO also notes that for customers on equal billing, a reduction to two

⁶BC Hydro, Commission staff and several Interveners also refer to this alternative as “self-read”.

reads per year (as opposed to six) would not reduce the “accuracy of their bills.” (BCPSO Final Submission, p. 5)

Electoral Area D Regional District of Central Kootenay (RDCK) cites section 60 of the UCA with respect to the Commission’s rate setting authority. Specifically, it refers to section 60(3): “special considerations applicable to an area that is sparsely settled or has other distinctive characteristics” (RDCK Final Submission, para 64). It submits that “The community of Johnson’s Landing, among other interveners in this hearing, have asked B.C. Hydro and the Commission to consider offering a self-read program as an integral part of the Meter Choices Program...” (RDCK Final Submission, para 65). BCSEA argues that the Commission should not require BC Hydro to implement a self-read system for Program participants with legacy meters (BCSEA Final Submission, p. 7).

BC Hydro does not believe significant cost savings would result from the introduction of self-read capability. BC Hydro believes that there would be incremental administrative costs to receive and process self-readings submitted by customers (Exhibit B-5, BCUC IR 1.9.2).

BC Hydro believes the self-read proposal is neither practicable nor cost-effective. BC Hydro submits that timely meter reading eliminates the need for large billing adjustments later, provides the benefit of revenue assurance and the timely collection of revenue for BC Hydro. It further submits that its ability to identify anomalies in the electric system — whether caused by overloaded transformers, malfunctioning equipment, meter tampering or theft of power — depends on electricity balance analysis, which uses interval data collected by smart meters and radio-off meters. BC Hydro states that it needs to collect the interval data from radio-off meters at minimum every two months in order to identify electric system issues and perform timely electricity balance analysis. It also states that it needs to collect actual consumption from legacy meters on a timely basis in order to support electricity balance analysis.

According to BC Hydro, travel is a significant portion of the meter reading cost in both rural and urban areas because meters requiring manual reads are dispersed throughout the service territory. Even if the majority of legacy and radio-off meter customers commit or are required to self-read the meter and submit the data on the required billing schedule, FMAs will still need to travel to

each area to download interval and event data from radio-off meters as well as those legacy meters where the customer does not participate in the self-read program. Where the customer has not provided a self-read as scheduled, a special dispatch of an FMA might be required to obtain the reading, requiring incremental exception management processes and increasing costs. Therefore, significant savings would not be expected. (BC Hydro Final Submission, p. 9)

BC Hydro states that it received 620 self-reported meter reads in 2012 and this level was easily absorbed within existing channels. However, a large scale self-read program could require IT investment. (Exhibit B-10, BCUC IR 2.29.3)

BC Hydro asserts that:

“[w]here manual meter reading (legacy meters) or manual download of meter data (non-connected smart meters or radio-off meters) is required, trained Field Metering Analysts (FMA) have the equipment and expertise to complete these tasks. FMAs ensure that meters are read accurately and on a specific schedule to ensure that readings are conducted in time for the customer’s scheduled billing date.” (Exhibit B-5 BCUC IR 1.9.2; BC Hydro Final Submission, pp. 7–8)

CEC agrees with BC Hydro, that the self-read proposal is neither practicable nor cost-effective (CEC Final Submission, p. 17).

3.6.5 Treatment of Non-Wide Area Network (WAN) Customers

There are 21,000 customer accounts where due to geographic or other factors customers are outside the range of backhaul communications (non-WAN customers) (Exhibit B-5, BCUC IR 1.19.4.3). The majority of these customers have been provided with smart meters. To assist with understanding this section, while these meters are transmitting — for geographic or other reasons — BC Hydro is unable to receive these transmissions through the WAN network. If BC Hydro had not installed a smart meter at a non-WAN residential customer’s residence by September 2013 when the Program was introduced, the customer would have been eligible to choose a smart meter, a radio-off meter or a legacy meter as permitted by the Program. The approved Program charges will apply to non-WAN customers who elect a legacy or radio-off meter option. (Exhibit B-14)

Non-WAN customers not in the Program also require manual meter reading. BC Hydro has allocated meter reading costs between non-WAN customers and Program customers based on the ratio of the number of meter readings required annually for non-WAN customers (186,000) to readings required annually for Program customers (60,000). This means 32.5 percent of manual meter reading costs are attributed to legacy and radio-off meter customers.

In its Supplemental Submission, CSTS submits that the costs for manually reading smart meters for non-WAN customers are being recovered from all ratepayers. As such, there is no need for BC Hydro to charge non-WAN customers a meter choices fee for retaining their legacy meter. Any double-recovery of costs ought to be rejected by the Commission. (Exhibit C4-8, p. 1)

CSTS also expresses concerns with respect to non-WAN costs in its Final Submission by stating:

“Where a customer resides in an Undeveloped Area, BC Hydro will incur a cost for manually reading that customer’s meter regardless of whether that meter is a smart meter, a radio-off meter or a legacy meter. As such, the cost of reading pre-exists the smart meter program and does not properly correspond to ‘program costs’, ‘investigation costs’ or ‘infrastructure costs’ as defined in Direction No. 4. As such, the CSTS requests that the Commission order BC Hydro to discount the monthly fee for radio-off and legacy meters so as to exclude a component equivalent to calculated costs for manual meter reading in the Undeveloped Areas.” (CSTS Final Submission, p. 6)

BC Hydro disagrees with the CSTS position and states:

“In part C of its final submission, the CSTS argues that the cost of manual meter reading for legacy and radio-off meter customers in ‘Undeveloped Areas’ (as defined by CSTS) is not a ‘program cost’ under Direction No. 4. BC Hydro does not agree with the CSTS argument. The manual meter reading costs included in the proposed charges have been estimated on an incremental basis. The costs to manually read smart meters in ‘Undeveloped Areas’ are not included in the proposed charges. The proposed charges for legacy and radio-off meter customers reflect the incremental cost of manual meter reading wherever the meters need to be read including in ‘Undeveloped Areas’. Accordingly, the cost component identified by the CSTS has not been included in the charges, and there is nothing to discount or remove in that regard.” (BC Hydro Reply Submission, pp. 12–13)

Commission Determination

Meter Reading in non-WAN Areas

BC Hydro has confirmed that it allocated the manual meter reading costs that are included in the Program on the basis of the costs associated with customers who are eligible and have elected (or are deemed to have elected) to retain a legacy meter or to have a radio-off meter installed.

Manual meter reading costs that are incurred by non-WAN customers who are not participants in the Program are not borne by participants in the Program. Instead these costs are allocated to all customers.

The Panel finds that the method for the allocation of costs between non-WAN customers and Program customers used by BC Hydro is just and reasonable as it only allocates, on a postage stamp basis, incremental costs associated with the Program to the customers who elect to retain their legacy meter or to have a radio-off meter installed.

Number of meter reads: A goal of the smart meter program is to make timely consumption data available. It is counter to this goal to reduce the meter reading frequency. Reducing the frequency of meter reads also hinders theft detection. **Accordingly, the Panel declines to approve a reduction in meter reading frequency for Program customers.**

Self-Reading: The Panel notes RDCK's reference to section 60(3) of the UCA. In the citation RDCK failed to note that 60(3) applies to taking a special area into account under subsection 60(2) of the UCA. Subsection 60(2) considers rate setting that "is adequate to yield a fair and reasonable return...on the...plant or system...for the purpose of providing the service in that area."

The Panel is not persuaded that the assumed cost savings and proposed benefits of self-reading are sufficient to outweigh stated costs and the concerns expressed by BC Hydro. Accordingly, the Panel will not approve a self-read program for Program customers. On the other hand, there may be circumstances where a discrete group of customers, perhaps in a semi isolated location collectively decide to maintain legacy meters and offer to self-read. In a case like this BC Hydro currently accommodates a very small amount of self-reading. In the event that BC Hydro continues

this practice with regard to Program customers, which BC Hydro is not required to do, the outcome of the review of the filing ordered in Section 4.2.2 of this Decision would apply.

Meter Reading Costs

The Panel finds vehicle and travel costs as estimated by BC Hydro to be reasonable. The Panel also agrees with BC Hydro's approach to estimate the cost per read by basing it upon observed productivity and a productivity improvement factor. **Accordingly the Panel accepts BC Hydro's forecast and approves the recovery, on an annual basis, of program costs of \$902,400 from Program radio-off meter customers and \$837,000 from Program legacy meter customers.**

3.7 Expired Meter Seal Exchange

As the seals on legacy meters remaining in service expire, BC Hydro states that it will exchange these legacy meters as long as there are replacement meters available in inventory. The length of time legacy meters will be available ultimately depends on how many customers choose the legacy meter option. It is estimated that replacement meters will be available until 2018 assuming that 5,000 customers ultimately choose the legacy meter option. BC Hydro states that of the approximately 60,000 legacy meters which remain in the field, about 40 percent have a Measurement Canada seal that has either expired or would expire at the end of calendar 2013. A further 14 percent will expire by the end of calendar year 2014. The seals on all existing legacy meters will have expired by the end of calendar 2021. (Exhibit B-1, pp. 3-16, 3-17)

BC Hydro estimates the per unit meter exchange cost to be \$55 in 2014, escalating to \$60 in 2018. Table 3.8, provided by BC Hydro, shows the estimated costs of legacy meter exchange through 2018, at which time the inventory will be expired. (Exhibit B-1, p. 3-17)

TABLE 3.8: Legacy Meter Exchange Costs (Revised)

Year	Percent Seal Expiry	Number of Customers	Cost Per Exchange (\$)	Total Cost (\$)
2014	53.5	2,677	\$55	\$147,235
2015	7.7	383	\$56	\$21,448
2016	12.0	602	\$57	\$34,314
2017	1.7	87	\$58	\$5,046
2018	18.0	531	\$60	\$31,860
Total Costs		\$239,903		
Average Cost		47,981		

(Source: Exhibit B-5, BCUC IR 1.17.1)

BC Hydro proposes that in order to maintain rate stability, cost recovery for expired meter seal exchanges in each year be aligned to the average over the period to 2021 (i.e., the latest year of meter seal expiry) (Exhibit B-1, p. 3-18).

No interveners commented on either BC Hydro's estimates of legacy meter exchange costs, or its proposed methodology to recover those costs.

Commission Determination

The Panel accepts BC Hydro's forecast and approves recovery of meter exchange costs in the amount of \$47,981 annually from Program legacy meter customers.

The Panel notes that the \$55 per unit exchange cost is escalated to \$60 by 2018. However, the proposed exit charge and failed installation charge which both use the per unit exchange cost as a proxy contain no such escalation.

3.8 Radio-off Meter Removal/Conversion Cost

BC Hydro states that the field area network radio in a radio-off meter will need to be reactivated in the event the customer moves from the premises or chooses a smart meter (Exhibit B-1, p. 3-15).

BC Hydro states that even with the firmware update, the radio cannot be activated over the air.

This conversion must be performed manually using the optical probe interface (Exhibit B-5, BCUC IR 1.14.1). The time required to reactivate the radio is relatively small, since the firmware version that allows the field area network radio to be turned on and off would have already been installed. To establish a cost for attending the premises and reactivating the network radio, BC Hydro uses the average meter exchange cost. BC Hydro estimates the average meter exchange cost to be \$55, based on the average (weighted by region) cost of attendance at a customer's premises to install a smart meter, across BC Hydro's service territory, by BC Hydro's contractors. (Exhibit B-1, pp. 3-6 to 3-7, 3-15)

BC Hydro proposes to recover the cost to reactivate the radio (i.e., an exit fee) as part of the Initial Charge for choosing a radio-off meter (Exhibit B-1, p. 3-15).

Commission Determination

The Panel accepts the \$55 Radio-off Meter Removal cost, as it reflects the costs incurred by BC Hydro to replace a radio-off meter with a smart meter or to activate the radio in a radio-off meter. The Panel directs that this program cost be recovered from any Program radio-off customers who move or request a smart meter.

3.9 Other Costs

3.9.1 Account Processing Costs

BC Hydro submits that

“[t]he work effort required to modify a customer account to reflect either a radio-off or legacy meter is expected to be similar to that for a new customer account, and may include customer communications, reviewing the customer account and the determination of eligibility, and processing the account change through BC Hydro's IT systems”. (Exhibit B-1, p. 3-13)

It estimates costs of \$124,000 to process the 10,000 Program customer accounts (Exhibit B-1, p. 3-13).

BC Hydro states that in processing a new customer account, the following activities are undertaken:

- Search records for customer
- Collect/verify customer information
- Assess customer's credit history
- Update/create customer record
- Perform credit check if required or discuss other alternatives for securing account
- Locate service address
- Validate premises type and rate category if needed
- Review service address history, confirm responsibility date of new tenant/owner
- Bill security deposit if required
- Establish billing
- Create or reinstate equal payment plan
- Create or reinstate pre authorized payment plan
- Create installment plan or other payment arrangements if needed
- Establish online profile for paperless billing if required
- Summarize new account details including billing, account number, charges etc.

According to BC Hydro, time is not specifically tracked for each activity in this process, "however overall average handle time for the Move-In, Move-Out process (which is where new accounts are processed) over the last 12 months is 466 seconds per transaction." (Exhibit B-6-1, CEC IR 1.32.1)

BC Hydro also states that the application for service process requires the collection of detailed customer information and therefore approximately 98 percent of the account charge can be attributed to customer communications (whether information is provided verbally or electronically) (Exhibit B-6-1, CEC IR 1.32.1).

BCPSO submits that it is difficult to see how processing a request for enrolment in the Meter Choices Program (which is what the allowance for account processing costs is meant to capture) could require anywhere near the equivalent amount of time. BCPSO suggests that half of this value

be used for setting the account processing costs associated with the Program. (BCPSO Final Submission, p. 6)

Commission Determination

The Panel agrees with the position of BCPSO. The activities involved in creating a new account are more extensive than those required to modify a customer account to reflect their participation in the Program. There is no evidence that the time involved in modifying an account is the same as the time required to create a new account.

However, the Panel also notes the broad range of concerns that have been expressed by parties in this proceeding, and expects that some of these concerns may also be raised by customers during the enrolment process, requiring some dialogue and response from BC Hydro. BC Hydro's expectation that 98 percent of the account charge is attributable to customer communications is reflective of this assumption.

The Panel further notes that the handle-time for the Move-in Move-out process, which forms the basis of the New Account processing fee proxy, is in the range of 6-7 minutes. The Panel finds this a reasonable assessment of the expected processing time for new Program customer accounts.

Accordingly, the Panel accepts BC Hydro's forecast and approves the recovery of \$124,000 for Account Processing costs from all Program customers.

3.9.2 IT Maintenance

BC Hydro proposes an annual IT maintenance cost of \$131,983 which is 10 percent of the sum of IT capital cost and the handheld units $[(\$1,238,000 + \$81,251) * 0.1]$ (Exhibit B-1, Appendix I, Schedules A-3 and A-4).

No parties proposed any alternative to the BC Hydro proposal.

Commission Determination

The Panel accepts BC Hydro's forecast and approves the annual recovery of \$131,983 for IT maintenance costs from all Program customers.

3.9.3 Training and Transition to Operations

BC Hydro estimates Training and Transition to Operations (TTO) activities will take approximately 625 hours. It lists the processes and actions involved in TTO as follows:

1. Revise existing processes and/or design new processes (e.g., Move-in, Move-out, Enrolment/Un-enrolment, etc.).
2. Develop/update new process documentation.
3. Design and develop training materials.
4. Deliver training (instructor time and participant time).

BC Hydro states that actions 1 and 2 above represent about 25 percent of the \$48,480 budget amount, action 3 represents about 10 percent, and action 4 represents about 65 percent. It further states that the \$48,480 represents about 12 percent of the total training budget for call centre training, back-office training and training development costs for the Smart Meter Initiative program. (Exhibit B-5, BCUC IR 1.15.1, 1.15.2)

No Intervener commented on BC Hydro's forecast of the TTO costs.

Commission Determination

The Panel accepts BC Hydro's forecast and approves the recovery of \$48,480 for TTO costs from all Program customers.

4.0 PROPOSED PROGRAM CHARGES

4.1 Initial Charge

BC Hydro proposes the following initial charges:

- \$100 for customers with a legacy meter electing to have a radio-off meter installed, and
- \$155 for radio-off customers moving to another premise who wish to remain a radio-off customer (Exhibit B-1, p. 1-3)

BC Hydro states that the first of the above charges consists of the cost components (all of which have previously been reviewed in this decision) shown in Table 4.1.

TABLE 4.1: Initial Charges Cost Components

Cost Component	Amount per Customer Applied for by BCH	Decision Reference
Account Processing	\$12.40	Section 3.9.1
Transition to Operations	\$4.85	Section 3.9.3
Radio-off Configuration	\$26.91	Section 3.5
Exit Charge	\$55.00	Section 3.8
Total	\$99.16	

(Source: Exhibit B-1, Appendix I, Schedule A-3)

BC Hydro proposes to recover half the \$124,000 Account Processing costs and half of the \$48,480 TTO costs from the radio-off meter customers through the Initial Charge. The remaining half of these charges will be recovered from legacy meter customers in the Monthly Charge. It calculates the per-customer portion of the Initial Charge to be \$4.85 for the TTO and \$12.40 for the Account Processing components of the Initial Charge. (Exhibit B-1, Appendix I, Schedules A-3, A-5)

Should a customer with a radio-off meter move to a new premises and elect to have a radio-off meter installed, BC Hydro proposes a charge of \$155.00. This charge reflects the costs associated set out above, plus the \$55 cost of attending the new premises and converting a smart meter to a radio-off mode. (Exhibit B-1, p. 1-3)

4.1.1 Intervener Submissions

BCSEA submits that “there is no reason why the legally required cost-recovery for radio-off service has to be structured with an initial charge plus a monthly charge rather than a simple monthly charge that recovers whatever costs are appropriately allocated to the installation of a radio-off meter.” In its submission, “given the substantial disincentive that an initial fee creates against selection of radio-off meter rather than a legacy meter, and the benefits of Meter Choice participants selecting radio-off meters rather than legacy meters,” it recommends that the Commission “approve a simple monthly fee for the radio-off service (and for the legacy meter service)”. (BCSEA Final Submission, pp. 8–9)

BCSEA also argues that the exit charge is not appropriate and should not be allocated to Program radio-off meter customers because the cost of installing a standard smart meter is routinely borne by all customers. As such, “it should not be recovered from a radio-off customer, either in advance or upon the customer’s exit from the Meter Choice program.” (BCSEA Final Submission, p. 9)

BCPSO argues that the inclusion of the \$55.00 fee in the Initial Charge, based on the premise that eventually the customer will move and BC Hydro will have to visit the residence and turn the smart meter radio on, is not appropriate. BCPSO argues that a customer may reside in the same premises for an extended period of time. BCPSO further argues that if the Commission leaves this charge in the initial fee there should be a credit provided to the customer for prepaying the exit charge. BCPSO estimates that the appropriate credit would be \$0.52/month. (BCPSO Final Submission, p. 8)

Ms. Skogstad argues that “setup rates for conversion to a radio-off meter should be reasonable and incurred at that point in time as some individuals may live out their lives in their existing residence, move to a care facility, or move out of province to be near family” (J. Skogstad Final Submission, p. 1).

The CSTS opposes the inclusion, in the initial radio-off meter charge, of a \$55 exit charge. CSTS argues that:

“[t]he cost to which the \$55 exit fee corresponds is not a certain cost, but rather a hypothetical one based on conjecture. It is a notional cost that is too remote to bring it within the scope of the language of Direction No. 4. In particular, that cost is too remote to be ‘related’ within the meaning of the terms ‘program costs’, ‘investigation costs’ or ‘infrastructure costs’ as defined in Direction No. 4.” (CSTS Final Submission, p. 7)

In its submission, CSTS states that the assumption that each radio-off meter will eventually be replaced by a smart meter is a false one. It argues that “[a]t the very least, there will be circumstances where customers retain their radio-off meters without any prospect of reverting to a smart meter in the foreseeable future.” (CSTS Final Argument, p. 6)

CSTS submits that “the \$55 exit fee should be refused by the Commission. Alternatively, there is no reason why such a cost should not be billed to the customer at the time that it is incurred. In either case, there is no basis for inclusion of the \$55 exit fee in the initial radio-off meter charge.” (CSTS Final Submission, p. 7)

4.1.2 BC Hydro Reply

BC Hydro agrees that the BCUC has discretion to structure the charges to be applied to radio-off meter customers differently than BC Hydro has proposed, provided it doesn’t “outright reject any of the cost categories BC Hydro has included because each of the categories falls within ‘program costs’, ‘infrastructure costs’ or ‘investigation costs’ as those terms are defined and used in Direction No. 4” (BC Hydro Reply Submission, p. 8).

BC Hydro acknowledges that the \$55.00 exit charge could be deducted from the Initial Charge but if this was done, it would need to be replaced with a further charge when a move occurred (Exhibit B-11, CEC IR 2.28.1). With respect to the application of a credit to account for customers prepaying the exit charge, BC Hydro states: “The approach suggested by the BCPSO, in the alternative, is not unreasonable however the amount estimated by the BCPSO (\$0.52/month) is unreasonable. The credit would be approximately \$0.10/month” (BC Hydro Reply Submission, p. 5).

Commission Discussion

It should be noted that the \$100 Initial Charge proposed by BC Hydro does not include a charge for attending the premises and installing the radio-off meter. BC Hydro states that this

“approach would create an inconsistent treatment of customers who choose smart meter compared to customers who choose the installation of a radio-off meter. In the first case, a cost is incurred to exchange a legacy meter for a smart meter, and in the second case a similar cost is incurred to exchange a legacy meter for a radio-off meter, so if the first customer is not charged for the exchange then neither should the second.” (Exhibit B-6-1, CEC IR 1.24.3.2.1)

Responding to BCSEA’s concern that an exit charge is not appropriate, the Panel notes that the radio-off meter is installed initially with no installation charge to the Program customer. Section 3(1)(b) of Direction No. 4 provides for recovery from all customers of costs incurred by BC Hydro “with respect to the installation and operation of, and services related to, smart meters.” BC Hydro appears to treat the installation of a radio-off meter in an analogous fashion, for billing purposes, to the installation of a smart meter. In any event, BC Hydro has not requested recovery of the initial installation charge of a radio-off meter. The Panel considers BC Hydro’s subsequent attendance to turn the radio on to be a Program Cost as defined in Direction No. 4. As such it is appropriate that it be recovered from Program radio-off meter customers.

Commission Determination

The Panel denies the proposed Initial Charge of \$100.

The “exit charge” is designed to pre-pay a cost that may occur at an indefinite future time. The Panel finds that to impose this cost on the customer in these circumstances is not just and reasonable. Requiring a customer to pre-pay for a service that may not be required for, in some cases, a number of years would necessitate BC Hydro to credit the customer with the carrying costs of that prepayment. While this approach may be considered reasonable, the Panel questions the need to require a payment for a possible future charge, when that payment will trigger a requirement to provide a monthly stream of payments back to the customer. **The Panel therefore denies the inclusion of the exit charge component in the Initial Charge as proposed. Instead, the Panel directs BC Hydro to charge for the Radio-off Meter Removal at the time the Program radio-**

off meter customer moves or the radio-off meter is replaced with a smart meter. The Commission Panel approves an exit charge of \$55 be applied to each Program radio-off meter customer, at such time as that customer moves or requests a smart meter.

The Panel has previously accepted the account processing cost and the transition to operations cost proposed by BC Hydro. However, the Panel does not agree with the proposed recovery of these costs in the Initial Charge. The Panel finds that because a Program radio-off meter customer could potentially pay the Initial Charge more than once (due to moving premises), this could result in an over collection of these costs from a subset of Program radio-off meter customers.

Accordingly, the Panel directs BC Hydro to recover all of the account processing cost and the transition to operations cost, as previously accepted by the Panel, from all Program customers in the Monthly Charge. The Panel will make further determinations concerning the Monthly Charge in section 4.2 of this decision.

With regard to the \$26.91 cost of configuring a radio-off meter, the Panel was only prepared to accept the lower amount of \$22.60. **Accordingly, BC Hydro is directed to set the Initial Charge for Program radio-off meter customers at \$22.60.**

Similarly, the Panel directs BC Hydro to set an Initial Charge for customers who move to a premises with an existing smart meter and request a radio-off meter at their new premises of \$77.60 (\$22.60 for meter configuration and \$55 installation of the radio-off meter at the new premises).

To be clear, a Program radio-off meter customer who moves to a new premises and requests a radio-off meter at the new premises will be charged \$55 as an exit charge related to the previous premises and \$77.60 as an initial charge at the new premises.

The Panel notes that BC Hydro did not request recovery of costs incurred to replace a legacy meter with a smart meter at the old premises when a Program legacy meter customer moves and remains enrolled in the Program.

4.2 Monthly Charge

BC Hydro's proposed Monthly Charge recovers both capital and operating costs.

TABLE 4.2: Proposed Monthly Charge Breakdown

	Capital Component	Operating Component	Total Monthly Charge	Monthly Charge Applied For
Radio-off Meter Customers	\$3.76	\$16.13	\$19.89	\$20
Legacy Meter Customers	\$6.35	\$29.81	\$36.16	\$35

(Source: Exhibit B-1, Appendix I, Schedules A-3, A-4)

The Panel has previously set out the cost components that it finds acceptable. This section examines the impact these cost components have on the applied for Monthly Charge and the resulting approved Monthly Charges for radio-off and legacy meters.

Commission Determination

Table 4.3 shows the costs BC Hydro included in its proposed Monthly Charge, along with the adjustments the Panel has previously made to these costs in this Decision. In addition, the account processing and TTO costs previously excluded by the Panel from the Initial Charge are shown included in the Monthly Charge.

TABLE 4.3: Approved Operating Costs Recovered in the Monthly Charge

COST ITEM	RADIO-OFF			LEGACY		
	BCH Proposed	Panel Adjustments	Approved	BCH Proposed	Panel Adjustments	Approved
Meter Reading	\$902,107		\$902,107	\$836,895		\$836,895
Theft Detection Annual Costs	N/A			\$816,277	(\$97,909)	\$718,368
IT Maintenance	\$65,991		\$65,991	\$65,991		\$65,991
Expired Meter Seal	N/A			\$47,964		\$47,964
Account Processing & TTO		\$21,560	\$21,560	\$21,560		\$21,560
Total Annual Operating Costs	\$968,098	\$21,560	\$989,658	\$1,788,687	(\$97,909)	\$1,690,778
Per Customer per Month	\$16.13		\$16.49	\$29.81		\$28.18

In the model to estimate total annual costs for Program legacy meter customers, BC Hydro has assumed a recovery period of four years for customer account processing costs and training and transition to operations costs. BC Hydro states that “[t]he recovery period has been roughly aligned to the period BC Hydro expects to have legacy meters in its inventory, although this period is dependent on the number of customers who choose the legacy meter option.” (Exhibit B-1, Application, Appendix I, Schedule A-4 Legacy Meter Option Cost Model; Exhibit B-5, BCUC IR 1.16.1)

The Panel has previously approved the recovery of \$124,000 for account processing costs and \$48,480 for TTO from all Program customers. The Panel has denied BC Hydro’s proposal to recover \$12.40 and \$4.85 for A/C processing costs and TTO respectively from the Initial Charge, which is borne only by Program radio-off meter customers. The Panel is of the view that these costs be recovered over four years from all Program radio-off customers, in the same way BC Hydro proposes to recover the TTO and account processing costs from Program legacy meter customers. Accordingly, an annual amount of \$21,560 has been added to the costs to be recovered from radio-off customers through the Monthly Charge. The Panel has determined this amount based on BC

Hydro's proposed Monthly Charge of \$0.36 per customer for this cost element, multiplied by 12 months/year and 5,000 legacy meter customers. **The Panel approves an amount of \$16.49 as the operating component of the Monthly Charge for Program radio-off customers and \$28.18 as the operating component of the Monthly Charge for Program legacy meter customers.**

In making these adjustments, the Panel is mindful that assuming a four year recovery would, all else equal, result in BC Hydro over-recovering in subsequent years. However, the Panel previously accepted BC Hydro's view that there is a likelihood that levels of enrolment in the Program could decrease over time, thereby potentially offsetting or mitigating the impact of any over collection. Further, the Panel has not authorized any carrying costs to be recovered in these charges, although it is expected that the majority of the costs will be incurred at the outset of the Program.

Accordingly, the Panel finds it just and reasonable to recover the account processing and TTO costs in this manner.

TABLE 4.4: Approved Capital Costs Recovered in the Monthly Charge

COST ITEM	RADIO-OFF			LEGACY		
	BCH Proposed	Adjustments	Approved	BCH Proposed	Adjustments	Approved
IT Systems Modifications	\$619,289	N/A	\$619,289	\$619,289	N/A	\$619,289
Check Meters				\$600,000	(\$200,000)	\$400,000
Additional Telecom	\$1,074,276	(\$154,921)	\$919,355	\$1,074,276	(\$154,921)	\$919,355
Handheld Units	\$40,628		\$40,628	\$40,628		\$40,628

The Panel has reduced the Additional Telecom costs by \$154,921. By the Panel's calculations, this results in a reduction of the annual capital related revenue requirement for recovery from Program radio-off meter customers from \$225,461 to \$211,146, or a decrease of 6.3 percent. Accordingly, the Panel reduces monthly capital related cost of \$3.76, as applied for by BC Hydro, to \$3.52. **The Panel approves an amount of \$3.52 as the capital component of the Monthly Charge for Program radio-off customers.**

The Panel has reduced the Check Meter capital cost component by \$200,000 and the Additional Telecom costs by \$154,921. By the Panel's calculations, this results in a reduction of the annual capital related revenue requirement for recovery from Program legacy meter customers from \$381,009 to \$314,845, or a decrease of 17.4 percent. **Accordingly, the Panel reduces the monthly capital related cost of \$6.35, as applied for by BC Hydro, to \$5.25 and approves this amount as the capital component of the Monthly Charge for Program legacy meter customers.**

The Panel notes that generally speaking, capital associated costs would be reduced over time, as the amount of rate-base, on which the return is calculated, decreases because of amortization. There is no allowance in the Monthly Charge for this decrease. However, the Panel also notes that this decrease will be mitigated if enrolment in the Program decreases. Additionally, there is no allowance for sustainment capital, which may be required to replace equipment during the course of the Program, and would therefore increase the capital associated costs. **Accordingly, the Panel accepts BC Hydro's capital associated costs to be just and reasonable.**

4.2.1 Deferred Capital Cost Savings

Mr. Wong, in Wong IR No. 2.1.1, asked BC Hydro assuming an 8 percent discount rate, to "calculate the annual avoided capital cost that should accrue to the benefit of an applicable customer if they elected to retain a legacy meter." BC Hydro responded with the table below where the confidential supplier contract unit prices are redacted and uses the rates used in the Program cost model provided in Appendix I.

TABLE 4.5: Calculation of Deferred Capital Cost Savings

	(\$)
Smart Meter Cost	
Installation	
Less: UTC Incurred	
Total	107.00
Amortization – 20 year life	5.35
Finance Charges	3.24
Return on Equity	3.80
Total Per Year	12.39
Total Per Month	1.03
Finance Rates	(%)
Cost of Debt	4.33
Cost of Equity	11.84
Regulatory Equity	30.0

(Source: Exhibit B-11, D. Wong IR 2.1.1)

The total avoided capital cost per month shown in Table 4.5 is \$1.03. In its Final submission BC Hydro states “The estimated savings are /month applicable to the legacy meter option only. There are no such potential savings for the radio-off meter option because this option requires the existing meter to be replaced with a smart meter with the radio transmitters deactivated” (BC Hydro Final Submission, p. 18).

Mr. Wong did not dispute BC Hydro’s calculation of \$1.03 in his Final Submission.

BCPSO states that:

“BC Hydro has acknowledged that by choosing to retain their existing meter, Legacy Meter Option customers are deferring the need for BC Hydro to incur the cost of purchasing and installing a smart meter. The estimated avoided costs are \$12.39 per year or \$1.03 per month. BCPSO submits that this amount should be credited (i.e., used to reduce) the monthly charge applicable to Legacy Meter Option customers.” (BCPSO Final Submission, pp. 6–7)

BC Hydro did not comment on this matter in its Reply Submission.

Commission Determination

In response to Mr. Wong's Information Request cited above, BC Hydro calculated the estimated savings of \$1.03 applicable to Program legacy meter customers and did not oppose the arguments of BCPSO and Mr. Wong that this amount should be used to reduce or be a cost reduction to the Monthly Charge applicable to Program legacy meter customers. **Therefore, the Commission Panel finds BC Hydro's estimate of the savings in response to the Wong IR to be reasonable and agrees that the Monthly Charge applicable to Program legacy meter customers should reflect a credit of \$1.03. The Panel directs BC Hydro to establish a Monthly Charge for the Program legacy meter customers of \$32.40 (\$5.25 capital component and \$28.18 operating component reduced by \$1.03 to account for the deferred capital cost saving).**

For convenience, the approved monthly charges are summarized below.

TABLE 4.6: Approved Monthly Charges Summary

	Capital Component	Operating Component	Deferred Capital Cost Savings	Monthly Charge
Radio-off Meter Customers	\$3.52	\$16.49	N/A	\$20.00 ⁷
Legacy Meter Customers	\$5.25	\$28.18	(\$1.03)	\$32.40

4.2.2 Failure to Read a Meter

Several Interveners indicated, either in preambles to IRs or in their Submissions, that BC Hydro has not, in the past, read their meter for several months and in some cases for extended periods of time, relying instead on estimates of consumption for billing purposes (Exhibit B-6-1, Rider IR 1.11.1; RDCK IR 1.15.0; Exhibit C8-1, Darwin's Comments; CSTS Final Submission, p. 7).

⁷ In the unique circumstances of this Application, the approved Monthly Charge is rounded from \$20.01 to \$20.00.

Panel Discussion

Having considered BC Hydro's application for meter reading every two months for both radio-off and legacy meters (Exhibit B-1, p. 3-19) and concluded not to approve either a reduction in meter reading frequency or a self-read program for Program customers, the Panel will now deal with the concerns raised above.

The BC Hydro Electric Tariff states:

5. METER READING AND BILLING

5.1. Meter Reading

The interval between consecutive meter readings shall be at the sole discretion of BC Hydro.

Where the Rate Schedule under which a Customer takes service does not require measurement of the Customer's demand, the meter will normally be read at intervals of two months. Where the Rate Schedule under which a Customer takes service requires measurement of the Customer's demand, the meter or meters will normally be read at intervals of one month.

In the Application BC Hydro requests a number of changes to the Tariff but does not propose a change to the above section.

The monthly charges for Program legacy meter customers and radio-off meter customers proposed in the Application are based on both the amortization of costs of a fixed nature, an example being infrastructure costs and costs caused by specific prospective activity, an example being meter reading. Meter reading costs represent a specific component of the roll up of monthly charges for both categories of meters in the Program. In section 4.2.1 of this decision, the Panel approves certain monthly charges for meter reading based on a calculation of costs by BC Hydro on the basis that the meter will be read every two months. The Electricity Tariff is clear that "The interval between consecutive meter readings shall be at the sole discretion of BC Hydro" and so BC Hydro reserves the flexibility to not strictly adhere to a bi-monthly meter reading obligation. At the same time, the Monthly Charge to Program customers is based on recovering the costs of bi-monthly readings.

Section 59 of the UCA states, in part:

- 59 (1) A public utility must not make, demand or receive
- (a) an unjust, unreasonable, unduly discriminatory or unduly preferential rate for a service provided by it in British Columbia, or
 - (b) A rate that otherwise contravenes this Act, the regulations, orders of the commission or any other law
- (4) It is a question of fact, of which the commission is the sole judge,
- (a) whether a rate is unjust or unreasonable

In Section 1.5 of this Decision, the Panel referred to the statutory definition of “unjust” and “unreasonable” found in section 59(5) of the UCA. For convenience, the Panel repeats the definition here:

- 59 (5) In this section, a rate is unjust or “unreasonable” if the rate is
- (a) more than a fair and reasonable charge for service of the nature and quality provided by the utility,
 - (b) insufficient to yield a fair and reasonable compensation for the service provided by the utility, or a fair and reasonable return on the appraised value of its property, or
 - (c) unjust and unreasonable for any other reason.

Commission Determination

The Panel has considered circumstances where BC Hydro reads a meter less frequently than bi-monthly but bills the customer a monthly charge to recover the costs of bi-monthly meter reading and determines that making such a charge is unjust and unreasonable. **Accordingly, in the event that a Program customer’s meter is read less frequently than bi-monthly the portion of the Monthly Charge attributable to bi-monthly meter reading costs, as approved elsewhere in this decision, must not be charged. The Panel directs BC Hydro to develop a solution to ensure these charges are just and reasonable, and only reflect meter reading costs for the frequency of actual meter readings. In developing its solution BC Hydro should also consider how, if subsequent to the date that the interim rates came into effect, a meter has been read less frequently than monthly, it will apply the retroactive adjustment in a just and reasonable manner. This proposed solution must be filed for review with the Commission on or before June 30, 2014.**

4.3 Failed Installation Charge

Direction No. 4 requires the Commission to allow BC Hydro to collect sufficient revenue from customer to cover “failed installation costs from customers at a premises where a failed installation occurred” (Direction 4, Section 3(1)(c)).

Section 1 of Direction No. 4 defines “failed installation costs” as follows:

“failed installation costs” means costs related to attendance at a premises to install a legacy meter, radio-off meter or smart meter where installation is not carried out because of either an objection made by a customer or an obstruction.

BC Hydro states:

“A failed installation occurs when BC Hydro or its contractor attends at a customer’s premises to install a legacy meter, radio-off meter or smart meter but the installation is not carried out because of either an objection made by a customer or an obstruction. The failed installation charge is designed to recover the expense of the failed installation from customers at the premises where the failed installation occurred rather than from all customers.” (Exhibit B-1, p. 2-8)

BC Hydro proposes that the failed installation charge be set at \$65.00. This charge is proposed to recover the cost to attend to a customer’s premises of \$55.00 and an additional \$10.00 for call centre costs (Exhibit B-1, p. 3-37). Call centre costs are based on an average call length of “about 5 minutes” (Exhibit B-1, p. 3-28).

The failed installation charge applies to residential and non-residential customers. It has a wider application than the Program and is similar in nature to the existing call-back charge in section 6.6 of BC Hydro Electric Tariff. (Exhibit B-5, BCUC IR 1.21.2)

BC Hydro has an existing agreement with a contractor to supply dedicated call centre agents to support the deployment of smart meters. The total number of agents engaged for this work is based on the total volume of expected customer contacts in the absence of the failed installation charge. Accordingly, it is appropriate to allocate these incremental costs to the failed installation charge. (Exhibit B-5, BCUC IR 1.2.13)

The cost per minute is calculated based on the loaded annual cost per customer service representative (CSR) per year (\$94,500) divided by total “talk minutes” per year of a CSR agent (48,000) or \$1.97 per minute (Exhibit B-5, BCUC IR 1.21.3.3).

Mr. Stachow states that he finds the BC Hydro definition of the failed installation charge to be “highly imprecise” and recommends that it be “clarified considerably” (Exhibit C26-2, p. 1).

Commission Determination

The Panel finds that the failed installation charge should appropriately be set on the basis of the cost to attend to the customer’s premises and customer call center costs. No evidence has been provided that disputes the BC Hydro estimate of \$10.00 for call center costs. This is based on an estimate of an average call length of “about 5 minutes”. Further, the Panel has previously accepted \$55 as a proxy for the average cost to attend a customer’s premise to perform meter installation or reconfiguration tasks.

The Panel accepts that the average cost of attending a customer’s premises and the associated call centre cost are the appropriate amounts to be applied in the failed installation charge. Accordingly, the Panel finds the failed installation charge of \$65.00 (\$10.00 plus \$55.00) to be just and reasonable and approves the charge in that amount as proposed by BC Hydro.

5.0 OTHER ISSUES ARISING

5.1 Constitutional Issue Raised by RDCK

RDCK submits that the Commission has the power to amend a tariff under section 58 of the UCA by making a determination and setting a rate under section 60 with due regard to section 59. It further submits that the Commission has no power to amend a tariff without making a determination and setting a rate under those sections. In its view, Direction No. 4 does not instruct the Commission to refrain from exercising its power to make a determination and set a rate under sections 58 through 60. (RDCK Final Submission, para. 11)

RDCK further submits that:

“being outside the powers of the Commission, s. 3(3) and related sections 3(4) and 4(2) of *Direction No. 4* fail to comply with the requirements of s. 3(1) of the *Utilities Commission Act* and, as such, is outside the realm of what is contemplated by s. 3(1) of the Act as to anything the Lieutenant Governor in Council may direct the Commission to do or refrain from doing”. (RDCK Final Submission, para. 12)

RDCK submits that this raises a constitutional question as to the propriety of Direction No.4, and its applicability to the Commission, and calls into question this Application, as well as the Commission’s Decision and Order G-166-13 (October 9, 2013). It does, however, acknowledge that the Commission has no jurisdiction over constitutional questions (with the exception, it says, of the Charter) and refers to section 3(4) of the UCA and section 44 of the *Administrative Tribunals Act* (ATA) (RDCK Final Submission, para. 13).⁸ It “observes that the Commission has the power, under s. 104 of the [UCA], to seek the opinion of the B.C. Court of Appeal on a question of law by way of stated case, and requests that the Commission seriously consider so doing” (RDCK Final Submission, para. 15).

In reply, BC Hydro cites section 3(2) of the UCA, which states:

- 3(2) The commission must comply with a direction issued under subsection (1), despite
- (a) any other provision of:
 - (i) this Act, except subsection (3) of this section, or
 - (ii) the regulations,
 - (a.1) any provision of the *Clean Energy Act* or the regulations under that Act, or
 - (b) any previous decision of the commission.

In BC Hydro’s view, RDCK’s submission that the requirements of Direction No. 4 are subservient to the requirements of UCA sections 58 through 60 is not correct, and the opposite is true. It submits that the “BCUC must comply with the requirements of Direction No. 4 despite any other provision

⁸ SBC 2004, c. 45, incorrectly cited by RDCK as R.S.B.C. 1996, c. 45, RDCK’s reference to s. 3(4) of the UCA in para. 12 of its Final Submission is to s. 2(4).

of the UCA” (BC Hydro Reply Submission, p. 18). Further, “BC Hydro replies that any such constitutional question is not within the scope of this proceeding and, in any event, is not a matter within the BCUC's jurisdiction to consider or determine” (BC Hydro Reply Submission, p. 18).

BC Hydro further provides a legal analysis for its position on the constitutional issue referencing section 1(4) [sic] of the UCA, section 44 of the ATA and section 8(2) of the *Constitutional Question Act*⁹ BC Hydro submits that the Commission must assume that the laws it applies are constitutionally valid (BC Hydro Reply Submission, pp. 17–19).

Commission Determination

In its argument on this issue, RDCK relies on section 3(1) of the UCA and fails to take into account section 3(2) of the UCA as noted by BC Hydro. The Commission cannot read section 3(1) in isolation from section 3(2). Therefore, taking into account both sections 3(1) and 3(2), the Panel agrees with BC Hydro that “RDCK’s submission that the requirements of Direction No. 4 are subservient to the requirements of UCA sections 58 through 60 is not correct, and that the opposite is true. [BC Hydro] submits that the ‘BCUC must comply with the requirements of Direction No. 4 despite any other provision of the UCA’” (BC Hydro Reply Submission, p. 18).

Direction No. 4 was made under section 3 of the UCA. Section 3(2) of the UCA, requires the Commission to comply with the direction unless the provisions of section 3(3) of the UCA apply. Those provisions are not relevant to the Application.

Further, as RDCK acknowledges, the Commission has no jurisdiction over constitutional questions. By operation of section 2(4) of the UCA, section 44 of the ATA applies to the Commission. Section 44 of the ATA provides that:

- 44(1) The tribunal does not have jurisdiction over constitutional questions.
- (2) Subsection (1) applies to all applications made before, on or after the date that the subsection applies to a tribunal.

⁹ RSBC 1996, c. 68.

Section 1 of the ATA defines “constitutional question” as follows:

“constitutional question” means any question that requires notice to be given under section 8 of the *Constitutional Question Act*.

Section 8(2) of the *Constitutional Question Act*, in turn, provides:

- 8(2) If in a cause, matter or other proceeding
- (a) the constitutional validity or constitutional applicability of any law is challenged, or
 - (b) an application is made for a constitutional remedy, the law must not be held to be invalid or inapplicable and the remedy must not be granted until after notice of the challenge or application has been served on the Attorney General of British Columbia in accordance with this section.

The Commission Panel agrees with BC Hydro that it must assume that the laws it applies are constitutionally valid. Since RDCK has defined its question as a “constitutional question” and acknowledges that the Commission does not have jurisdiction over such questions, the Commission considers RDCK’s submissions on this issue moot.

5.2 Charter Issue Raised by RDCK

RDCK also submits that the *Canadian Charter of Rights and Freedoms* (*Charter*) applies to both BC Hydro and the Commission and that, as the Panel understands RDCK's argument, the *Charter* is engaged with respect to charges sought in the Application.

RDCK submits:

“If, despite a jurisdictional constitutional question having arisen, the Commission proceeds with this application, Area ‘D’ makes the following submissions concerning the cost recovery which is to say, the amounts charged by B.C. Hydro for their meter ‘choice’. Area ‘D’ wishes to first review the applicability of the *Canadian Charter of Rights and Freedoms* (the *Charter*) with respect to fees which effectively constitute a penalty for disability or is otherwise discriminatory.” (RDCK Final Submission, para. 16)

RDCK first argues that the *Charter* applies to BC Hydro. It generally refers to BC Hydro's Final Submission where BC Hydro anticipated RDCK might raise the issue of *Charter* applicability.¹⁰ There, BC Hydro referred to the FortisBC Application for a Radio-off Advanced Metering Infrastructure Option proceeding and the Commission's finding in that proceeding that the *Charter* is not applicable to FortisBC and, in any event, that the FortisBC Radio-off Meter Option is not discriminatory under the UCA.¹¹ RDCK states that Area 'D' [RDCK] has joined a reconsideration application of that finding as an error of law. However, RDCK notes that the Commission is not bound to follow its previous decisions.

The Panel observes that subsequent to the filing of RDCK's Final Argument, by Order G-46-14 dated March 26, 2014, the Commission denied the reconsideration application to which RDCK refers.¹²

RDCK cites *Eldridge v. British Columbia* (Attorney General) and argues:

"Smart-metering in British Columbia and all that arises therefrom is a specific governmental policy goal mandated by the government through specific legislation. The B.C. Hydro Meter Choices Program is undeniably part and parcel of the BC government smart-meter policy and program. As such, the Charter applies to B.C. Hydro, a government entity, in its implementation of a specific policy of the government. As such, it easily meets the test in *Eldridge*." (RDCK Final Submission, para 24.)

RDCK also submits that the *Charter* applies to the Commission.

Further, it makes submissions relating to the issue of disability in the context of its *Charter* submissions. RDCK submits: "whether a person, exhibiting severe and persistent symptoms associated with EHS, and which are unattributable to any other cause, is disabled." and

"that it is *prima facie* demeaning and discriminatory to force a disabled person to pay a penalty as a result of their disability, in effect, to apply a tax or surcharge

¹⁰ BC Hydro Final Submission, pp. 18–19.

¹¹ *In the Matter of FortisBC Inc. Application for the Radio Meter Option Application*, Decision and Order G-220-13, dated December 19, 2013.

¹² *In the Matter of FortisBC Inc. Application for the Radio Meter Option Application for Reconsideration of British Columbia Utilities Commission Decision and Order G-220-13*, Decision and Order G-46-14, dated March 26, 2014.

on the severely limiting imperative imposed upon them by their disability to avoid exposure to radio frequency emitting devices.” (RDCK Final Submission, paras. 38 and 55)

In reply, BC Hydro submits:

“Beginning at paragraph 17 of its final submission, the RDCK refers to the Canadian Charter of Rights and Freedoms (the ‘**Charter**’) but the RDCK submissions do not indicate the actions or decisions at issue in this proceeding, if any, that might be subject to the Charter, whether such actions or decisions would contravene a Charter principle, or whether the BCUC would have jurisdiction over the matter. Moreover, the RDCK asserts at paragraph 30 that the ‘Commission, as a quasi-judicial body, has complete and unfettered jurisdiction over Charter issues’, but that assertion is not correct. Per section 8(2) of the *Constitutional Question Act* a ‘constitutional question’ includes a request for a ‘constitutional remedy’ which means a remedy under section 24(1) of the Charter other than a remedy consisting of the exclusion of evidence or consequential on such exclusion. Thus, questions related to a remedy under the *Charter* (other than those related to exclusion of evidence, as noted) are ‘constitutional questions’ that are not within the BCUC’s jurisdiction.

In response to paragraphs 31 to 55 of the RDCK final submission, BC Hydro submits that discounted rates based on a customer’s characteristics (whether income level or disability) are not permissible under Direction No. 4 or under the UCA. Refer to the submissions in paragraphs 14-15 above and in the Appendix. To the extent the RDCK would raise a constitutional question about... its rate discount issue, the RDCK must do so before a tribunal with jurisdiction and with notice to the Attorneys General.”
(BC Hydro Reply Submission, p. 20)

Paragraphs 14-15 of BC Hydro’s Reply Submission state:

“14. At paragraphs 40 to 44 of its final submission, the BCPSO submits that the BCUC should consider subsidized charges for low income legacy and radio-off meter customers. The proposed subsidy would be funded by higher charges to the other legacy and radio-off meter customers. In reply, BC Hydro submits that Direction No. 4 to the BCUC does not provide for subsidized charges for low income legacy and radio-off meter customers. The Electric Tariff conditions for the Meter Choices Program as set out in Appendix A to 4 and approved by the BCUC on a permanent basis do not provide for the possibility of different charges based on an eligible customer’s income level or other personal characteristic. The charges are to be applied based on the type of meter installed at the eligible customer’s premises in accordance with their election or deemed election. Moreover, as referenced in paragraph 43 of the BCPSO final submission BC Hydro believes that subsidized rates for utility service for low income or disabled

customers is a matter for government policy and not considered under the *Utilities Commission Act*. It is for the government to decide whether to adjust the assistance levels outlined in paragraph 41 of the BCPSO final submission, in light of shelter cost pressures.

15. BC Hydro has made submissions to the BCUC in the past on the issue of whether the BCUC has jurisdiction under the *Utilities Commission Act* to set a subsidized rate based on the personal characteristics of the customer (such as income level) and divorced from the characteristics of the service to which the rate relates. The Appendix to these reply submissions contains a copy of BC Hydro's submissions on the issue as submitted to the BCUC in the 2008 Residential Inclining Block Rate proceeding. Note that in its September 24, 2008 decision on that application the BCUC determined in relation to the issue that, 'it is unnecessary for it to decide the issue at this time because it has concluded that even if it had the jurisdiction to do so; it would not exercise that discretion as part of this Decision.'" [Footnotes omitted.]

Commission Determination

The Panel finds that it cannot take into account the issues of health and disability in setting rates for Program customers. In the Panel's view such considerations are both beyond the jurisdiction of the Commission and out of scope for this proceeding for the following reasons.

First, for the reasons given in section 5.1 of this Decision, the Commission does not have jurisdiction over constitutional questions.

Second, the Commission does not have the power to grant a remedy under section 24(1) of the *Charter*, since section 8(1) of the *Constitutional Question Act* defines a "constitutional remedy" to mean "a remedy under section 24(1) of the *Canadian Charter of Rights and Freedoms* other than a remedy consisting of the exclusion of evidence or consequential on such exclusion." The Commission does not have "complete and unfettered jurisdiction over *Charter* issues" as RDCK asserts.

Third, as submitted by BC Hydro, RDCK's submissions "do not indicate the actions or decisions at issue in this proceeding, if any, that might be subject to the *Charter*, whether such actions or

decisions would contravene a *Charter* principle, or whether the BCUC would have jurisdiction over the matter.”

Fourth, for the reasons given in sections 1.5 and 5.1 of this Decision, the Commission must comply with the provisions of Direction No.4 which takes precedence over all the provisions of the UCA relating to matters to which Direction No. 4 applies. In the Panel's view, the wording of Direction No. 4 does not allow it to take into account issues of health and disability in setting rates that allow BC Hydro to collect sufficient revenue to recover the costs referred to in Direction No. 4. The limited scope of the proceeding reflected this fact. Issues of health and disability were not within the scope of this proceeding.

DATED at the City of Vancouver, in the Province of British Columbia, this 25th day of April 2014.

Original signed by:

L.F. KELSEY
COMMISSIONER

Original signed by:

N.E. MACMURCHY
COMMISSIONER

Original signed by:

D.M. MORTON
COMMISSIONER



**BRITISH COLUMBIA
UTILITIES COMMISSION**

**ORDER
NUMBER G-59-14**

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**IN THE MATTER OF
the Utilities Commission Act, R.S.B.C. 1996, Chapter 473**

and

**British Columbia Hydro and Power Authority
Application for Approval of Charges
Related to Meter Choices Program**

BEFORE: L.F. Kelsey, Panel Chair
D.M. Morton, Commissioner
N.E. MacMurchy, Commissioner

April 25, 2014

O R D E R

WHEREAS:

- A. On September 25, 2013, BC Regulation 203/2013 (Direction No. 4) came into force. Direction No. 4 provides direction to the British Columbia Utilities Commission (Commission) with respect to implementation of the Government of British Columbia's policy that British Columbia Hydro and Power Authority (BC Hydro) offer alternative meter choices to eligible customers who choose not to have a smart meter at their premises and that eligible customers choosing an alternative meter option will have to pay additional charges designed to recover the costs attributable to their chosen option. Direction No. 4 also provides for the recovery of failed installation costs from customers at premises where a failed installation of a legacy meter, radio-off meter or smart meter occurs;
- B. Direction No. 4 also states, in part, that a customer who fails to provide notice of election to BC Hydro by December 1, 2013 is deemed to have elected to retain the existing legacy meter at the customer's premises;
- C. Direction No. 4 further requires, among other things, that the Commission must within 30 days of the date the Direction comes into force, issue an order amending BC Hydro's Electric Tariff Terms and Conditions for retention or installation of legacy meters and radio-off meters, and the respective periods during which the legacy meters and radio-off meters may remain in place. It also prohibits the Commission from exercising a power under the *Utilities Commission Act* (Act) that would directly or indirectly prevent BC Hydro from installing, operating or providing services in respect of legacy meters, smart meters and radio-off meters;
- D. On October 7, 2013, BC Hydro filed an application for approval of new standard charges, new Electric Tariff Terms and Conditions, and regulatory accounting treatment pursuant to sections 58-61 of the Act and Direction No. 4 (Application);

**BRITISH COLUMBIA
UTILITIES COMMISSION**

**ORDER
NUMBER G-59-14**

- E. On October 9, 2013, pursuant to Direction No. 4, the Commission issued Order G-166-13 approving: (a) the failed installation charge of \$65, on an interim and refundable basis, effective October 25, 2013; (b) the amended Electric Tariff as set out in the Appendix to Direction No. 4; and (c) the use of its existing Smart Metering and Infrastructure Regulatory Account to include its program costs, investigation costs and infrastructure costs that are not recovered from eligible customers at premises where a legacy meter or radio-off meter is installed;
- F. On October 11, 2013, the Commission issued Order G-167-13 which established a Regulatory Timetable for a Written Hearing process to review the remaining portion of the Application. Order G-167-13 also established, among other things, the scope of the hearing and the approval, on an interim and refundable basis, of the proposed charges to be applied to customers who choose to retain a legacy meter or elect to have a radio-off meter installed at their premises, to be effective December 2, 2013 and April 1, 2014 respectively;
- G. Order G-167-13 was the subject of a reconsideration application. By Order G-50-14, dated March 28, 2014, the Commission dismissed the reconsideration application;
- H. The Regulatory Timetable provided for a registration deadline for Interveners and Interested Parties. Thirty-five parties registered as Interveners; ten Interveners participated in two rounds of Information Requests (IRs) and another five in one round of IRs. One hundred and fifty-two individuals registered as Interested Parties and 1,109 individuals filed one or more Letters of Comment;
- I. On October 22, 2013, BC Hydro filed, in compliance to Orders G-166-13 and G-167-13, the new Terms and Conditions of the Electric Tariff and amendments that included the setting of the following proposed charges on an interim and refundable basis: (a) a failed installation charge effective October 25, 2013; (b) legacy meter charges effective December 2, 2013; and (c) radio-off meter charges effective April 1, 2014;
- J. On November 18, 2013, the Commission issued Order G-186-13 granting in part BC Hydro's request for an extension in time to file its responses to IR No. 1 and establishing an Amended Regulatory Timetable;
- K. By letter dated December 16, 2013, BC Hydro filed updated enrolment data as of December 13, 2013 for its Meter Choices Program;
- L. By letter dated February 3, 2014, the Commission, among other matters, made further rulings on the scope of the hearing;
- M. BC Hydro and 15 Interveners filed Final Submissions. BC Hydro and three Interveners filed Supplemental Submissions on a Commission Panel Information Request to BC Hydro that was delivered on February 24, 2014. BC Hydro filed a Reply to the Final Submissions and to the Supplemental Submissions. BC Hydro's Reply to the Supplemental Submissions of the Interveners was filed on March 18, 2014; and
- N. The Commission has reviewed and considered the Application, the evidence, the Final Submissions, the Supplemental Submissions and BC Hydro's Reply.

**BRITISH COLUMBIA
UTILITIES COMMISSION**

**ORDER
NUMBER G-59-14**

3

NOW THEREFORE the Commission, for the reasons stated in the Decision issued concurrently with this Order, orders that:

1. The proposed Initial Charges for radio-off customers and proposed Monthly Charges for radio-off and legacy meter customers are denied.
2. The following charges for radio-off and legacy meter customers are considered just and reasonable and are approved on a permanent basis as follows:
 - a. Radio-off Meter Installation Charge (from existing legacy meter) – \$22.60, effective April 1, 2014
 - b. Radio-off Meter Installation Charge (applicable eligible customers who move to a premises that has a smart meter installed and elect to have that smart meter replaced with a radio-off meter) – \$77.60, effective April 1, 2014
 - c. Radio-off Meter Removal Charge (when replaced with a smart meter or to activate the radio in a radio-off meter) – \$55.00, effective April 1, 2014
 - d. Monthly Charge for radio-off meter customers – \$20.00, effective April 1, 2014
 - e. Monthly Charge for legacy meter customers – \$32.40, effective December 2, 2013
3. The proposed Failed Installation Charge of \$65.00 is approved on a permanent basis effective October 25, 2013.
4. The British Columbia Hydro and Power Authority (BC Hydro) is to provide notice to all Meter Choices Program customers of the approved charges for the Meter Choices Program as soon as practicable.
5. BC Hydro is to refund, as soon as practicable, to Meter Choices Program customers any difference in interim charges approved in Order G-167-13 and the final charges as approved in this Order, including interest at BC Hydro's most recent annual weighted average cost of debt for its most recent fiscal year.
6. BC Hydro is to file, within 30 days of this Order, the relevant Electric Tariff pages to show that the Tariff conforms to this Order and to the Decision that is issued concurrently.
7. BC Hydro is directed to comply with all other directives in the Decision issued concurrently with this Order.

DATED at the City of Vancouver, in the Province of British Columbia, this 25th day of April 2014.

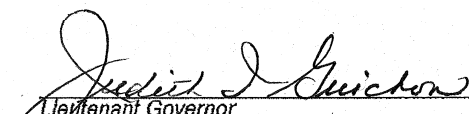
BY ORDER

Original signed by:

L.F. Kelsey
Commissioner/Panel Chair

PROVINCE OF BRITISH COLUMBIA
ORDER OF THE LIEUTENANT GOVERNOR IN COUNCIL

Order in Council No. 391, Approved and Ordered September 24, 2013


Lieutenant Governor

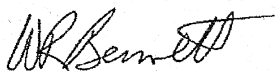
Executive Council Chambers, Victoria

On the recommendation of the undersigned, the Lieutenant Governor, by and with the advice and consent of the Executive Council, orders that the attached Direction No. 4 to the British Columbia Utilities Commission is made.


DEPOSITED

September 25, 2013

B.C. REG. 203/2013



Minister of Energy and Mines and
Minister Responsible for Core Review



Presiding Member of the Executive Council

(This part is for administrative purposes only and is not part of the Order.)

Authority under which Order is made:

Act and section: *Utilities Commission Act*, R.S.B.C. 1996, c. 473, s. 3

Other:

September 6, 2013

R/515/2013/27

DIRECTION NO. 4 TO THE BRITISH COLUMBIA UTILITIES COMMISSION

Contents

- 1 Definitions
- 2 Application
- 3 Rates
- 4 Commission's powers

APPENDIX

Definitions

1 In this direction:

"Act" means the *Utilities Commission Act*;

"applicable customer" means a residential customer of the authority who receives services from the authority at an applicable premises;

"applicable premises" means a building, structure or equipment of a customer if the building, structure or equipment is connected to the electric distribution system and has an electricity meter;

"electricity balance analysis" has the same meaning as in the Smart Meters and Smart Grid Regulation, B.C. Reg. 368/2010;

"failed installation costs" means costs related to attendance at a premises to install a legacy meter, radio-off meter or smart meter where installation is not carried out because of either an objection made by a customer or an obstruction;

"infrastructure costs" means costs related to the installation and operation of communications infrastructure in areas where the installation of one or more legacy meters or radio-off meters hinders or would hinder the transmission of information among smart meters;

"investigation costs" means costs related to investigating and identifying the location of unmetered loads referred to in section 4 (1) (a) (iv) of the Smart Meters and Smart Grid Regulation, B.C. Reg. 368/2010, in areas where the installation of one or more legacy meters reduces or would reduce the accuracy of electricity balance analyses performed to estimate the extent and location of those loads;

"legacy meter" means an electricity meter, other than a smart meter or a radio-off meter, that is of a type in use by the authority;

"program costs" means costs related to the installation and operation of, and services related to, legacy meters or radio-off meters at applicable premises, including, without limiting this, costs related to

- (a) computer hardware and software systems respecting the use and operation of legacy meters or radio-off meters,
- (b) the conversion of radio-off meters into smart meters for future customers,
- (c) attendance at an applicable premises to install a legacy meter or radio-off meter;

"radio-off meter" means a smart meter adjusted so that the meter's components that transmit data by radio are deactivated;

"smart meter" means a meter that

- (a) meets the requirements set out in section 2 of the Smart Meters and Smart Grid Regulation, B.C. Reg. 368/2010, and
- (b) has components that transmit data by radio and those components are activated.

Application

- 2 This direction is issued to the commission under section 3 of the Act.

Rates

- 3 (1) In setting rates under the Act for the authority, the commission must ensure that the rates allow the authority to collect sufficient revenue in each fiscal year to enable it to recover the following costs from the following customers:
- (a) program costs, investigation costs and infrastructure costs from
 - (i) applicable customers at applicable premises where a legacy meter or radio-off meter is installed, to the extent that the authority requests recovery of any of those costs from these customers, and
 - (ii) all customers, to the extent that any of those costs are not recovered under subparagraph (i);
 - (b) from all customers, costs incurred with respect to the installation and operation of, and services related to, smart meters;
 - (c) failed installation costs from customers at a premises where a failed installation occurred.
- (2) The commission must allow the authority to establish a regulatory account for the recovery of costs referred to in subsection (1) (a) (ii) and (1) (b) for the period from January 1, 2013, to March 31, 2014.
- (3) Within 30 days of the date this direction comes into force, the commission must issue an order so that the Electric Tariff of the authority is amended by adding the provisions set out in the Appendix to this direction.
- (4) The commission must not do anything to amend the provisions added to the Electric Tariff under subsection (3), except on application by the authority.

Commission's powers

- 4 (1) The commission must not exercise a power under the Act in a way that would directly or indirectly prevent the authority from installing, operating or providing services in respect of legacy meters, smart meters and radio-off meters.
- (2) The commission must not require the authority to install a legacy meter or radio-off meter for
- (a) a non-residential customer, or
 - (b) an applicable customer, if a smart meter is installed at the applicable premises of the applicable customer on or after the date this direction comes into force.

- (3) Without limiting subsection (1) of this section, the commission must refrain from exercising its power under section 45 (5) of the Act to the extent to which the section is applicable with respect to the installation and operation of legacy meters, smart meters and radio-off meters.

APPENDIX
(section 3 (3))

Interpretation

The definitions in Direction No. 4 to the British Columbia Utilities Commission apply to sections 4.2.1 to 4.2.4 of this tariff.

4.2.1. Meter Types

BC Hydro's standard meter for measuring Electricity consumption and (if applicable) demand at a Customer's Premises is the Smart Meter. Except as set out in section 4.2.2, in all cases BC Hydro will install a Smart Meter at a Customer's Premises.

Notwithstanding the preceding paragraph, but subject to the conditions specified in section 4.2.2 being satisfied in each case, BC Hydro will permit to remain in operation, install, replace, maintain and service Legacy Meters and Radio-off Meters at a Residential Service Customer's Premises for the periods specified in sections 4.2.3 and 4.2.4.

4.2.2. Conditions for Retention or Installation of Legacy Meters and Radio-off Meters

The conditions that must be satisfied in order for BC Hydro to permit to remain in operation, install, replace, maintain and service Legacy Meters or Radio-off Meters at a Residential Service Customer's Premises are:

- (a) the Customer is, as of the date of the Customer's election in accordance with clause (c) or deemed election in accordance with clause (d), taking Residential Service at the Customer's Premises;
- (b) BC Hydro had not, before the date of the Customer's election in accordance with clause (c) or deemed election in accordance with clause (d), installed a Smart Meter at the Customer's Premises, but rather a Legacy Meter remained in place at those Premises as of the date of the Customer's election or deemed election; and
- (c) the Customer, during the period beginning September 1, 2013 and ending December 1, 2013, by notice to BC Hydro, elects to retain the Legacy Meter then in place at the Customer's Premises, or to have a Radio-off Meter installed in place of the Legacy Meter; or
- (d) the Customer, despite satisfaction of the conditions set out in clauses (a) and (b) has failed to provide notice of election to BC Hydro in accordance with clause (c), in which case the Customer shall be deemed to have elected effective December 1, 2013, to retain the existing Legacy Meter at the Customer's Premises and the Customer shall thereafter pay the charges for having a Legacy Meter installed at the Customer's Premises as set out in the Schedule of Standard Charges.

4.2.3. Periods during which Legacy Meters May Remain in Place

If the conditions set out in section 4.2.2 have been satisfied, Residential Service Customers who have satisfied the conditions in section 4.2.3 and who have elected, or are deemed to have elected, to retain a Legacy Meter at the Customer's Premises may continue to have their Electricity consumption measured by the Legacy Meter for the periods, and subject to the conditions, specified below:

- (a) A Customer who has elected, or is deemed to have elected, to retain a Legacy Meter can continue to retain the Legacy Meter until the seal of the meter expires, or the meter ceases to function properly, whichever comes first.
- (b) If the seal of a Legacy Meter expires, or the meter ceases to function properly before the seal expiry date, BC Hydro will, so long as it has a suitable Legacy Meter in its meter inventory available for installation, install a replacement Legacy Meter at the Customer's Premises. A Customer for whom a replacement Legacy Meter has been installed in accordance with the preceding sentence can continue to retain the replacement Legacy Meter for the period specified in clause (a), and any replacement Legacy Meter so installed shall be subject to replacement in accordance with this clause (b) as the occasion arises. For purposes of this section, BC Hydro will only be deemed to have suitable replacement Legacy Meters in its meter inventory if it has existing verified and sealed Legacy Meters in its meter inventory as of the date that a Legacy Meter in place at a Customer's Premises requires replacement, and BC Hydro is under no obligation to repair, rebuild or modify, or re-verify and re-seal, any Legacy Meters that have been removed from service for any reason, nor to purchase or otherwise acquire from any source any Legacy Meters in replenishment of its Legacy Meter inventory.
- (c) In any case where the seal of a Legacy Meter expires, or the meter ceases to function properly, and BC Hydro does not have a suitable Legacy Meter in its meter inventory available for installation, BC Hydro will install either a Smart Meter or a Radio-off Meter at the Customer's Premises, at the Customer's election. A Customer with a Legacy Meter installed at the Customer's Premises can also elect to have a Smart Meter or a Radio-off Meter installed in place of the Legacy Meter at any time. A Customer who elects to have a Smart Meter or a Radio-off Meter installed at the Customer's Premises cannot later change back to a Legacy Meter at the applicable Premises.
- (d) A Customer with a Legacy Meter in place at the Customer's Premises who moves to another Premises for which the Customer is eligible to take Residential Service, can elect to have a Smart Meter or Radio-off Meter installed at the new Premises, but cannot retain or have installed a Legacy Meter at the new Premises. Except where a Customer who is eligible to elect to have either a Smart Meter or a Radio-off Meter installed in a new Premises moves into the vacated premises and elects to have a Radio-off Meter installed, the vacated Premises will in all cases have a Smart Meter installed.
- (e) A Customer with a Legacy Meter in place whose service is terminated for any reason whatsoever ceases to be eligible to retain a Legacy Meter, and if that Customer again takes Residential Service at the same or another Premises the Customer can elect to have either a Smart Meter or a Radio-off Meter installed upon resumption of service.

- (f) In any case where a Customer ceases to be eligible to have a Legacy Meter installed at the Customer's Premises, or BC Hydro no longer has suitable Legacy Meters available for installation at the Customer's Premises, and the Customer is required to elect to have either a Radio-off Meter or a Smart Meter installed instead, but the Customer refuses or fails to make an election within 10 days after BC Hydro has delivered written notice to the Customer's Premises notifying the Customer that he or she must elect either a Radio-off Meter or a Smart Meter, the Customer will be deemed to have elected to have a Radio-off Meter installed and the Customer shall pay the charges for having a Radio-off Meter installed at the Customer's Premises as set out in the Schedule of Standard Charges from the date of BC Hydro's installation of the replacement Radio-off Meter.

4.2.4. Periods during which Radio-off Meters May Remain In Place

If the conditions set out in section 4.2.2 have been satisfied, Residential Service Customers who have satisfied the conditions in section 4.2.2 and who have elected, or is deemed to have elected, to have a Radio-off Meter installed may continue to have their Electricity consumption measured by the Radio-off Meter for the periods, and subject to the conditions, specified below:

- (a) A Customer who has elected, or is deemed to have elected, to have a Radio-off Meter installed can continue to retain the Radio-off Meter, and have a replacement Radio-off Meter installed from time to time as necessary, for so long as the Customer continues to take Residential Service at the Customer's Premises.
- (b) A Customer with a Radio-off Meter in place at the Customer's Premises who moves to another Premises for which the Customer is eligible to take Residential Service, may elect to have a Smart Meter or a Radio-off Meter installed at the new Premises. Except where a Customer who is eligible to have either a Smart Meter or a Radio-off Meter installed in a new Premises moves into the vacated Premises and elects to have a Radio-off Meter installed, the vacated Premises will in all cases have a Smart Meter installed.
- (c) A Customer with a Radio-off Meter in place whose service is terminated for any reason whatsoever, but who again takes Residential Service at the same or another premises may elect to have either a Smart Meter or a Radio-off Meter installed upon resumption of service.

SIXTH FLOOR, 900 HOWE STREET, BOX 250
VANCOUVER, B.C. V6Z 2N3 CANADA
web site: <http://www.bcuc.com>



**BRITISH COLUMBIA
UTILITIES COMMISSION**

**ORDER
NUMBER G-186-13**

TELEPHONE: (604) 660-4700
BC TOLL FREE: 1-800-663-1385
FACSIMILE: (604) 660-1102

IN THE MATTER OF
the Utilities Commission Act, R.S.B.C. 1996, Chapter 473

and

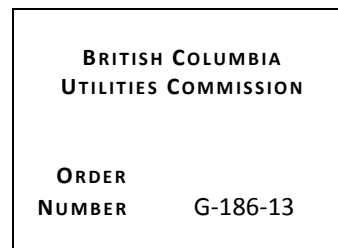
British Columbia Hydro and Power Authority
Application for Approval of Changes
Related to Meter Choices Program

BEFORE: L.F. Kelsey, Panel Chair
D.M. Morton, Commissioner November 18, 2013
N.E. MacMurchy, Commissioner

O R D E R

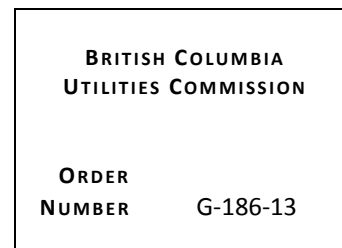
WHEREAS:

- A. British Columbia Hydro and Power Authority (BC Hydro) filed on October 7, 2013, pursuant to sections 58 to 61 of the *Utilities Commission Act* (Act) and Direction No. 4 to the British Columbia Utilities Commission (BCUC, Commission) (BC Reg. 203/2013), an application for approval of new standard charges, new Electric Tariff Terms and Conditions, and regulatory accounting treatment related to its Meter Choices Program (Application);
- B. The Lieutenant Governor in Council issued Direction No. 4 on September 25, 2013. Direction No. 4 provides direction to the BCUC with respect to implementation of the Government of British Columbia policy that BC Hydro offer alternative meter options and related services to eligible customers who choose not to have a smart meter at their premises, and that eligible customers choosing an alternative meter option will have to pay additional charges designed to recover the costs attributable to their chosen option. Direction No. 4 also provides for the recovery of failed installation costs from customers at premises where a failed installation of a legacy meter, radio-off meter or smart meter occurs;
- C. The Commission issued Order G-166-13 dated October 9, 2013 approving: (a) the failed installation charge of \$65, on an interim and refundable basis, effective as of October 25, 2013; (b) the amended Electric Tariff as set out in the Appendix to Direction No. 4; and (c) the use of its existing SMI Regulatory Account to include its program costs, investigation costs and infrastructure costs that are not recovered from eligible customers at premises where a legacy meter or radio-off meter is installed and the costs related to smart meters, incurred during the period January 1, 2013 to March 31, 2014, in accordance with section 3(2) of Direction No. 4;



2

- D. On October 11, 2013, the Commission issued Order G-167-13 which set out, among other matters:
- (a) BC Hydro's proposed charges to be applied to customers that have a legacy meter installed at their premises on an interim and refundable basis, to be effective December 2, 2013;
 - (b) BC Hydro's proposed charges to be applied to customers that have a radio-off meter installed at their premises on an interim and refundable basis, to be effective April 1, 2014; and
 - (c) a written hearing process and a Regulatory Timetable for the review of the remainder of the Application. The Regulatory Timetable provided for, among other matters, the delivery of Information Request (IR) No. 1 by the BCUC and Interveners by November 6, 2013 and for BC Hydro's Responses to those IRs by November 19, 2013;
- E. The remaining items to be approved in the Application are:
- (a) the failed installation charge on a final basis effective as of October 25, 2013;
 - (b) charges to be applied to customers in relation to their choice of a legacy meter on a final basis to be effective December 2, 2013; and
 - (c) the charges to be applied to customers in relation to their choice of a radio-off meter on a final basis to be effective April 1, 2014;
- F. By email dated November 3, 2013, two Interveners, the Citizens for Safe Technology Society (CSTS) and Nomi Davis (ND), requested an extension of time for the filing of their first round IRs until November 8, 2013. The Commission granted the CSTS/ND request by letter dated November 5, 2013 and extended the time for BC Hydro to deliver its Responses to those IRs until November 21, 2013;
- G. By email dated November 6, 2013, a third Intervener, Graydon Tyskerud requested an extension in time to issue his first round IRs until November 11, 2013. The Commission granted Mr. Tyskerud the same extension it had previously granted CSTS/ND and similarly extended the time for BC Hydro to deliver its Responses to Mr. Tyskerud's IRs until November 21, 2013;
- H. By letter dated November 14, 2013, BC Hydro requests an extension to the November 19 and 21, 2013 filing dates for its Responses to IRs No. 1 on the grounds that it does not believe it will be able to meet the filing dates given the short period of time allotted to comprehensively respond to the over 800 IRs it received. BC Hydro requests that the filing date be extended to November 29, 2013 for all first round IRs (BC Hydro Request). The letter also includes a revised timetable which incorporates a longer timeline for the proceeding to take into account the reduced working days at the end of December due to statutory holidays;



3

- I. The Commission has received submissions from the following nine Interveners on the BC Hydro Request: Commercial Energy Consumers of British Columbia (CEC), Mr. David Wong, CSTS/ND, Regional District Central Kootenay Area D (RDCK), Mr. Jim Stachow, Mr. John Hurd, Ms. Judy Skogstad and Mr. Ron Warder; and
- J. The Commission has reviewed and considered BC Hydro's Request and the submissions it has received from the Interveners.

NOW THEREFORE for the reasons set out in the Reasons for Decision attached as Appendix A to this Order the Commission orders that:

1. The British Columbia Hydro and Power Authority (BC Hydro) Request is granted in part. BC Hydro is to deliver its Responses to Information Requests No. 1 from the BCUC and Ms. Skogstad on or before Friday, November 22, 2013. The filing date for the remainder of BC Hydro's Responses to Information Requests No.1 is extended to Friday, November 29, 2013.
2. The Regulatory Timetable established by Order G-167-13 is amended by the Amended Regulatory Timetable attached as Appendix B to this Order.

DATED at the City of Vancouver, in the Province of British Columbia, this 18th day of November 2013.

BY ORDER

Original signed by:

L.F. Kelsey
Panel Chair

Attachments

British Columbia Hydro and Power Authority
Application for Approval of Changes
Related to Meter Choices Program

REASONS FOR DECISION

BACKGROUND

On October 7, 2013, British Columbia Hydro and Power Authority (BC Hydro) filed an application with the Commission for approval of new standard charges, new Electric Tariff Terms and Conditions, and regulatory accounting treatment related to its Meter Choices Program (Application).

The Application was filed in accordance with Direction No. 4 to the British Columbia Utilities Commission (BCUC, Commission) on September 25, 2013. Direction No. 4 provides direction to the Commission with respect to implementation of the Government of British Columbia's policy that BC Hydro offer alternative meter choices to eligible customers who choose not to have a smart meter at their premises and that eligible customers choosing an alternative meter option will have to pay additional charges designed to recover the costs attributable to their chosen option. Direction No. 4 also provides for the recovery of failed installation costs from customers at premises where a failed installation of a legacy meter, radio-off meter or smart meter occurs.

On October 9, 2013, the Commission issued Order G-166-13 approving the failed installation charge on an interim and refundable (with interest) basis, and the new terms and conditions in sections 4 and 6 of the Electric Tariff as set out in the Appendix to Direction No. 4. On October 11, 2013, the Commission issued Order G-167-13 setting out, among other matters:

- (a) BC Hydro's proposed charges to be applied to customers that have a legacy meter installed at their premises on an interim and refundable basis, to be effective December 2, 2013;
- (b) BC Hydro's proposed charges to be applied to customers that have a radio-off meter installed at their premises on an interim and refundable basis, to be effective April 1, 2014; and
- (c) the review format and timetable for the review of the remainder of the Application.

The Regulatory Timetable, attached as Appendix B to Order G-167-13 provides for, among other matters, registration of Interveners and Interested Parties by October 24, 2013, two rounds of Information Requests (IRs) from the BCUC and Interveners and a written public hearing process. The BCUC and Interveners were to deliver their first round IRs to BC Hydro by November 6, 2013 and BC Hydro is to respond to those IRs by November 19, 2013.

A total of 35 parties have registered as Interveners. Three Interveners, the Citizens for Safe Technology Society and Nomi Davis (CSTS/ND) and Mr. Tyskerud, requested extensions for the filing of their IRs. CSTS/ND requested an extension to November 8 and Mr. Tyskerud to November 11. By letter dated November 5, 2013, the Commission granted the extension sought by CSTS/ND and allowed BC Hydro until November 21 to deliver its Responses to the CSTS/ND IRs. By letter dated November 6, 2013, the Commission granted Mr. Tyskerud the same extension it had granted CSTS/ND and allowed BC Hydro the same additional time to deliver its Responses to his IRs.

BC Hydro's Request

By letter dated November 14, 2013, BC Hydro requests an extension to the November 19 and 21, 2013 filing dates for its Responses to IR No. 1 on the grounds that it does not believe it will be able to meet the filing dates given the short period of time allotted to comprehensively respond to the over 800 IRs it received. BC Hydro requests that the filing date be extended to November 29, 2013 for all first round IRs (BC Hydro Request). The letter also includes a revised timetable which incorporates a longer timeline for the proceeding to take into account the reduced working days at the end of December due to statutory holidays.

BC Hydro's revised timetable is set out below:

BC Hydro Response to IR No. 1	Friday, November 29
BCUC and Intervener IRs No. 2	Friday, December 20
BC Hydro Response to IRs No. 2	Friday, January 17
BC Hydro Final Written Submission	Friday, January 24
Intervener Final Submission	Friday, February 7
BC Hydro Reply Submission	Friday, February 14

Intervener Responses

The following nine Interveners made submissions on the BC Hydro Request: Commercial Energy Consumers of British Columbia (CEC), Mr. David Wong, CSTS/ND, Regional District Central Kootenay Area D (RDCK), Mr. Jim Stachow, Mr. John Hurd, Ms. Judy Skogstad and Mr. Ron Warder. Only CEC provides unqualified support for the BC Hydro Request.

Mr. Wong supports the BC Hydro Request and BC Hydro's proposed adjustments to the Regulatory Timetable "if this will allow BC Hydro to provide complete and comprehensive responses to the Intervener's 800 questions." However, he also requests that the BCUC amend its interim approval of BC Hydro's requested charge for a legacy meter. He submits that any delay in the regulatory timetable extends the cost risk to customers who elect to keep their legacy meters in the hope that the BCUC will lower the fees requested by BC Hydro. He requests that the BCUC amend its interim approval and apply only a nominal fee to customers who retain their legacy meters in the period after December 1, 2013 until April 1, 2014. He does acknowledge, however, that section 4.2.2 (c) of the Appendix to Special Direction No. 4 likely does not provide the Commission with the discretion to order an extension to the December 1st deadline.

CSTS/ND request the suspension of the interim approval of any opt-out fee pending the Commission's final determination of the Application on its merits. They submit that there is a public perception of the absence of due process when BC Hydro starts charging opt-out fees prior to a final determination and "[t]he proposed delay only exacerbates this concern."

RDCK only supports the BC Hydro Request if the Commission agrees to the requests of Mr. Wong and CSTS/ND "by lowering or eliminating the interim \$35 monthly legacy fee until the Commission has rendered its decision as to how legacy meters could be read and/or self read." RDCK argues that the \$35 charge will be especially onerous on low income customers when it remains unclear on how the meters may be read and what the subsequent charges may be.

APPENDIX A

to Order G-186-13

Page 3 of 5

Mr. Stachow submits that “many people with legacy meters lack the money to pay [the \$35 monthly proposed fee]” scheduled to become effective December 2. He argues that BC Hydro’s ability to charge interim fees “necessarily works in Hydro’s favour be [sic] lessening the number of people able to afford continued resistance to meters they do not want in their homes. The fact that BC Hydro is are [sic] requesting that [the Commission’s] date of decision be further delayed serves to compound this problem.” [emphasis in original] He asks that the imposition of the proposed fees be delayed by at least two months from December 2, 2013.

Mr. Hurd requests an extension in the date for the commencement of the interim charges on legacy and radio-off meters. Essentially he suggests that such an extension would allow for a fair and unbiased hearing on the appropriate charges if any.

Ms. Skogstad filed two submissions, both dated November 15, 2013. She “strenuously” objects to the BC Hydro Request. In her first submission she says that she has been waiting until after November 19th to make her decision on her option, “in order to be as well informed as possible in making [her] choice” and that “November 29th does not leave enough time to review the information and advise BC Hydro of [her] decision prior to December 1, 2013. She submits if the Commission’s process is to be meaningful, the Commission should either refuse the BC Hydro Request or extend the December 1 deadline. In her second submission, she reiterates her position that she was relying upon BC Hydro’s first round of responses to arrive at her decision and repeats her request for a change in the interim order to delay the deadline for the response of customers.

Mr. Ron Warder submits that he does not disagree with BC Hydro’s request for an extension; however, he submits that it is patently unfair and unreasonable to allow BC Hydro to apply the current smart meter “option” fees in advance of a Commission determination. He therefore “respectfully requests that the Commission suspend its Order providing for these interim penalties.”

Commission Panel Decision

According to BC Hydro, it has received in excess of 800 first round IRs. The Regulatory Timetable presently requires all those IRs with the exception of those relating to CSTS/ND and Mr. Tyskerud to be responded to by November 19, with those of CSTS/ND and Mr. Tyskerud by November 21. This is a significant, although not impossible, task to accomplish within the time frame set by the existing Regulatory Timetable. BC Hydro seeks a 10 day delay in total for its Responses (8 days in the case of its Response to in responding to CSTS/ND and Mr. Tyskerud).

With the exception of CEC, all the Interveners who have filed submissions will only agree to the BC Hydro Request with conditions. Those conditions, for the most part, involve the imposition of the interim opt-out fee effective December 2, 2013. Ms. Skogstad requests that the date for the decision to opt-out of December 1, 2013, be extended. She also says that she was awaiting BC Hydro’s Responses to IR No. 1 before making her decision on whether to opt-out.

Direction No. 4 was issued pursuant to section 3 of the *Utilities Commission Act* (Act). Sections 3(2) and (3) of the Act provide:

- (2) The commission must comply with a direction issued under subsection (1), despite
 - (a) any other provision of
 - (i) this Act, except subsection (3) of this section, or
 - (ii) the regulations,

- (a.1) any provision of the *Clean Energy Act* or the regulations under that Act, or
- (b) any previous decision of the commission.

- (3) The Lieutenant Governor in Council may not under subsection (1) specifically and expressly
 - (a) declare an order or decision of the commission to be of no force or effect, or
 - (b) require the commission to rescind an order or a decision.

Thus, the Commission must comply with Special Direction 4 unless the section 3(3) exceptions apply.

Section 3(3) of Direction No. 4 provides:

- (3) Within 30 days of the date this direction comes into force, the commission must issue an order so that the Electric Tariff of [BC Hydro] is amended by adding the provisions set out in the Appendix to this direction.

Section 4.2.2 of the Appendix states:

4.2.2. Conditions for Retention or Installation of Legacy Meters and Radio-off Meters

The conditions that must be satisfied in order for BC Hydro to permit to remain in operation, install, replace, maintain and service Legacy Meters or Radio-off Meters at a Residential Service Customer's Premises are:

- (a) the Customer is, as of the date of the Customer's election In accordance with clause (c) or deemed election In accordance with clause (d), taking Residential Service at the Customer's Premises;
- (b) BC Hydro had not, before the date of the Customer's election in accordance with clause (c) or deemed election in accordance with clause (d), installed a Smart Meter at the Customer's Premises, but rather a Legacy Meter remained in place at those Premises as of the date of the Customer's election or deemed election; and
- (c) the Customer, during the period beginning September 1, 2013 and ending December 1, 2013, by notice to BC Hydro, elects to retain the Legacy Meter then in place at the Customer's Premises, or to have Radio-off Meter installed in place of the Legacy Meter; or
- (d) the Customer, despite satisfaction of the conditions set out in clauses (a) and (b) has failed to provide notice of election to BC Hydro in accordance with clause (c), in which case the customer shall be deemed to have elected effective December 1, 2013, to retain the existing Legacy Meter at the Customer's Premises and the Customer shall thereafter pay the charges for having a Legacy Meter installed at the Customer's Premises as set out in the Schedule of Standard Charges.

Mr. Wong acknowledges that it is "likely" that the Commission has no power to extend the December 1 deadline. By reason of section 3(2) of the Act, the Commission cannot alter the December 1, 2013 election end date as Ms. Skogstad requests.

The Commission Panel is not prepared to vary the amount of the interim opt-out fee at this time. The Commission Panel does not have any evidence on hand on which it could base its decision on the amount of the opt-out fee other than evidence provided by BC Hydro. The Commission Panel is of the view that fulsome and comprehensive responses from BC Hydro to relevant IRs will provide the best evidence to the Panel for the purposes of making its final decision on the Application. The interim opt-out fee remains refundable, either wholly or in part, depending on the view that the Panel ultimately takes of all the evidence relating to the imposition of such a fee.

The Commission Panel, however, has some sympathy for Ms. Skogstad's submission that she was awaiting BC Hydro's first round IR responses before making her decision on the option she would choose. While the Commission cannot change the December 1, 2013 date, it will order BC Hydro to provide the answers to the IRs of the BCUC and Ms. Skogstad on or before November 22, 2013. Those Responses should at least provide her with enough information for her to make her decision.

The Commission Panel, therefore, only grants BC Hydro's Request in part. BC Hydro is to respond to the first round IRs of the Commission and Ms. Skogstad on or before Friday, November 22, 2013 and to the remaining IRs on or before Friday, November 29, 2013.

The Commission Panel amends the Regulatory Timetable as set out in the Amended Regulatory Timetable is attached as Appendix B to Order G-186-13.

British Columbia Hydro and Power Authority
Application for Approval of Changes Related to Meter Choices Program

AMENDED REGULATORY TIMETABLE

ACTION	DATE (2013)
BCUC and Intervener Information Request (IR) No. 1	Wednesday, November 6
BC Hydro Response to BCUC IR No. 1 and Ms. Skogstad IR No. 1	Friday, November 22
BC Hydro Response to Interveners' IR No. 1	Friday, November 29
BCUC and Intervener IR No. 2	Friday, December 20
ACTION	DATE (2014)
BC Hydro Response to IR No. 2	Friday, January 17
BC Hydro Final Written Submission	Friday, January 24
Intervener Final Submission	Friday, February 7
BC Hydro Reply Submission	Friday, February 14

Note: Commission Letters included in Exhibits A-4 and A-5 granted extension requests to Interveners CSTS/ND and Mr. Tyskerud by two days to November 8, 2013. BC Hydro was also granted an extra two days to November 21, 2013, to respond to these Interveners.

IN THE MATTER OF
the Utilities Commission Act, R.S.B.C. 1996, Chapter 473

and

British Columbia Hydro and Power Authority
Application for Approval of Charges Related to Meter Choices Program

EXHIBIT LIST

Exhibit No.	Description
<i>COMMISSION DOCUMENTS</i>	
A-1	Letter Dated October 9, 2013 – Order G-166-13 Electric Tariff Terms and Conditions
A-2	Letter Dated October 9, 2013 - Appointing the Commission Panel for the review of the British Columbia Hydro and Power Authority Application for Approval of Charges Related to Meter Choices Program
A-3	Letter Dated October 11, 2013 – Order G-167-13 Establishing the Regulatory Timetable
A-4	Letter Dated November 5, 2013 – Commission Granting CSTS IR No. 1 Extension Request
A-5	Letter Dated November 6, 2013 – Commission Information Request No. 1 to BC Hydro
A-6	Letter Dated November 6, 2013 – Commission Granting Tyskerud IR No. 1 Extension Request
A-7	Letter Dated November 18, 2013 – Commission Order G-186-13 and Amended Regulatory Timetable
A-8	Letter Dated November 22, 2013 – J. Hurd Application for Reconsideration
A-9	Letter Dated November 21, 2013 – D. Barbisan Application for Reconsideration
A-10	Letter Dated December 3, 2013 – Request BC Hydro to provide customer enrolment data as requested by BCSEA and Mr. Wong in their IRs-1
A-11	Letter Dated December 20, 2013 – Commission Information Request No. 2
A-12	CONFIDENTIAL Letter Dated December 20, 2013 – Commission Confidential Information Request No. 2

EXHIBIT LIST
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Exhibit No.	Description
A-13	Letter Dated January 10, 2014 – Request for CSTS and BCH Counsels to review Information Requests in Exhibit C4-6 to Determine if in scope
A-14	Letter Dated February 3, 2014 – Response to CSTS Exhibit C4-7 – BC Hydro outstanding responses to CSTS IR-2
A-15	Letter L-9-14 Dated February 4, 2014 – Request for Comments on John Hurd’s Request for Reconsideration of Order G-186-13 – Phase 1
A-16	Letter Dated February 6, 2014 – Issuing Commission Order G-15-14 regarding the Amended Regulatory Timetable
A-17	Letter Dated February 11, 2014 – Issuing Commission Order G-16-14 amending the Reply date for the Reconsideration application
A-18	Letter Dated February 24, 2014 – Panel Information Request No. 1 to BC Hydro
A-19	Letter Dated March 28, 2014 - Issuing Commission Order G-50-14 and Reasons for Decision regarding John Hurd’s application for Reconsideration of Orders G-167-13 and G-186-13

COMMISSION STAFF DOCUMENTS

A2-1	Letter Dated November 6, 2013 – Commission Staff Filing BC Hydro and Power Authority – Electric Load Forecast Fiscal 2013 to Fiscal 2033
A2-2	Letter Dated November 6, 2013 – Commission Staff Filing Intelligentutility January/February 2013 - “Making dumb European rollouts SMART”
A2-3	Letter Dated November 6, 2013 – Commission Staff Filing Towngas – Report Meter Reading
A2-4	Letter Dated November 6, 2013 – Commission Staff Filing CLP Hong Kong Limited – CLP Hong Kong App—Green Power in Your Hands

Exhibit No.	Description
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APPLICANT DOCUMENTS

B-1	BRITISH COLUMBIA HYDRO AND POWER AUTHORITY (BCH) Letter Dated October 7, 2013 - Application for Approval of Charges Related to Meter Choices Program
B-2	Letter Dated October 22, 2013 – BCH Submitting Publications Compliance with Order No. G-167-13 Directive 1
B-3	Letter Dated October 22, 2013 – BCH Submitting Compliance with Order No. G-166-13 and G-167-13 new Terms and Conditions of the Electric Tariff and amendments
B-4	Letter Dated November 14, 2013 - BCH Submitting Extension Request regarding Responses to Information Request No. 1
B-5	Letter Dated November 22, 2013 - BCH Responses to BCUC Information Request No. 1
B-5-1	CONFIDENTIAL Letter Dated November 22, 2013 - BCH Confidential Responses to BCUC Information Request No. 1
B-6	Letter Dated November 22, 2013 - BCH Responses to Skogstad Information Request No. 1
B-6-1	Letter Dated November 29, 2013 - BCH Responses to Interveners Information Request No. 1
B-6-2	Letter Dated January 17, 2014 – BCH Submitting Revised IR No. 1 Response
B-7	Letter Dated December 4, 2013 - BC Hydro Compliance with Exhibit A-10
B-8	Letter Dated December 16, 2013 - BC Hydro Submitting Enrolment Status
B-9	CONFIDENTIAL Letter Dated January 17, 2014 – BCH Submitting Responses to BCUC Confidential IR No. 2
B-10	Letter Dated January 17, 2014 – BCH Submitting Responses to BCUC Information Requests No. 2 (Public Version)
B-10-1	CONFIDENTIAL Letter Dated January 17, 2014 – BCH Submitting Responses to BCUC Information Requests No. 2 (Confidential Version)
B-11	Letter Dated January 17, 2014 – BCH Submitting Responses to Intervener Information Requests No. 2

Exhibit No.	Description
B-12	Letter Dated January 17, 2014 – BCH Submitting status of discussion with CSTS regarding unanswered round 1 information requests
B-13	Letter Dated February 14, 2014 – BCH Comments regarding Hurd Reconsideration Request of G-168-13
B-14	Letter Dated March 3, 2014 – BCH Submitting Responses to BCUC Panel Information Request No. 1
B-14-1	CONFIDENTIAL Letter Dated March 3, 2014 – BCH Submitting Confidential Responses to BCUC Panel Information Request No. 1
B-14-2	Letter Dated March 6, 2014 – BCH Supplemental Submissions Regarding Panel Information Request No. 1
B-15	Letter Dated March 14, 2014 – BCH Supplemental Reply Submissions

INTERVENER DOCUMENTS

C1-1	BRITISH COLUMBIA PENSIONERS' AND SENIORS' ORGANIZATION, ACTIVE SUPPORT AGAINST POVERTY, BC COALITION OF PEOPLE WITH DISABILITIES, COUNSEL OF SENIOR CITIZENS' ORGANIZATIONS OF BC, AND THE TENANT RESOURCE AND ADVISORY CENTRE (BCPSO) Letter dated October 24, 2013 – Request for Intervener Status by Tannis Braithwaite, Erin Pritchard and Bill Harper
C1-2	Letter dated November 6, 2013 – BCPSO Submitting Information Request No. 1
C1-3	Letter dated December 2, 2013 – BCPSO Submitting Support regarding Request for BC Hydro to accelerate timing of responses to select BCSEA IRs
C1-4	Letter dated December 20, 2013 – BCPSO Submitting IR No. 2
C1-5	Letter Dated February 14, 2014 – BCPSO Submitting comments regarding Hurd Reconsideration Request of G-168-13
C2-1	BC SUSTAINABLE ENERGY ASSOCIATION AND THE SIERRA CLUB OF BRITISH COLUMBIA (BCSEA) Letter dated October 21, 2013 – Request for Intervener Status by William Andrews and Thomas Hackney
C2-2	Letter dated November 6, 2013 – BCSEA Submitting Information Request No. 1
C2-3	Letter dated December 2, 2013 – Request for BC Hydro to accelerate timing of responses to select BCSEA IRs

Exhibit No.	Description
C2-4	Letter dated December 20, 2013 – BCSEA Submitting IR No. 2
C2-5	Letter Dated February 14, 2014 – BCSEA Submitting comments regarding Hurd Reconsideration Request of G-168-13
C2-6	Letter Dated March 10, 2014 – BCSEA supplemental submission regarding Exhibit A-18
C3-1	COMMERCIAL ENERGY CONSUMERS ASSOCIATION OF BRITISH COLUMBIA (CEC) Letter dated October 10, 2013 – Request for Intervener Status by Christopher Weafer
C3-2	Letter dated November 6, 2013 – CEC Submitting Information Request No. 1
C3-3	Letter dated November 15, 2013 – CEC Submitting Comments regarding BC Hydro Extension Request
C3-4	Letter dated December 20, 2013 – CEC Submitting IR No. 2
C3-5	Letter Dated March 13, 2014 – CEC submission regarding Exhibit A-18
C4-1	CITIZENS FOR SAFE TECHNOLOGY SOCIETY (CSTS) Letter dated October 11, 2013 – Request for Intervener Status by David Aaron
C4-2	Letter dated November 3, 2013 – CSTS Extension Request
C4-3	Letter dated November 8, 2013 – CSTS Submitting Information Request No. 1
C4-4	Letter dated November 15, 2013 – CSTS Submitting Comments regarding BC Hydro Extension Request
C4-5	Letter dated December 2, 2013 – CSTS Submitting request for Revised Regulatory Timetable
C4-6	Letter dated December 20, 2013 – CSTS Submitting IR No. 2
C4-7	Letter dated January 29, 2014 – CSTS Request to Commission for BC Hydro to respond to outstanding responses in IR-2
C4-8	Letter Dated March 13, 2014 – CSTS submission regarding Exhibit A-18
C5-1	DAVIS, NOMI (DAVIS) Letter dated October 11, 2013 - Request for Intervener status per Mr. David Aaron, counsel for Citizens for Safe Technology Society
C6-1	WEISBERG, FRED (WEISBERG) Letter dated October 24, 2013 - Request for Intervener status

Exhibit No.	Description
C7-1	REGIONAL DISTRICT CENTRAL KOOTENAY (RDCK) Letter dated October 28, 2013 - Request for Intervener status from Andy Shadrack
C7-2	Letter dated November 6, 2013 – RDCK Submitting Information Request No. 1
C7-2-1	Letter dated November 10, 2013 – RDCK Submitting Correction to Information Request No. 1
C7-3	Letter dated November 15, 2013 – RDCK Submitting Comments regarding BC Hydro Extension Request
C7-4	Letter dated December 2, 2013 – RDCK Submitting Support regarding Request for BC Hydro to accelerate timing of responses to select BCSEA IRs and Wong
C7-5	Letter dated December 20, 2013 – RDCK Submitted Information Request No. 2
C7-6	Letter dated February 5, 2014 - RDCK comments regarding Hurd Reconsideration Request of G-168-13
C7-7	Letter Dated February 14, 2014 – RDCK Submitting comments regarding Hurd Reconsideration Request of G-168-13
C8-1	DARWIN, K (DARWIN) Letter dated October 21, 2013 - Request for Intervener status
C8-2	Letter dated December 2, 2013 – Darwin Submitting Support regarding Request for BC Hydro to accelerate timing of responses to select BCSEA IRs and Wong
C8-3	Letter Dated February 14, 2014 – Darwin Submitting comments regarding Hurd Reconsideration Request of G-168-13
C9-1	WISHART, S (WISHART) Letter dated October 18, 2013 - Request for Intervener status
C9-2	Letter dated November 5, 2013 – Wishart Submitting Letter of Comment
C10-1	Barker, B (Barker) Letter dated October 24, 2013 - Request for Intervener status
C11-1	WITHDRAWN
C12-1	Priest, J (Priest) Letter dated October 22, 2013 - Request for Intervener status
C13-1	HURD, J (HURD) Letter dated October 23, 2013 - Request for Intervener status
C13-2	Letter dated November 6, 2013 – Hurd Submitting Information Request No. 1

EXHIBIT LIST
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Exhibit No.	Description
C13-3	Letter dated November 15, 2013 – Hurd Submitting Comments regarding BC Hydro Extension Request
C13-4	Letter dated November 19, 2013 – Hurd Submitting Questions regarding Order G-186-13
C13-5	Letter dated February 1, 2014 - Hurd Reconsideration Request of G-168-13
C13-6	Letter dated February 11, 2014 – Hurd Submitting Extension Request
C13-7	Letter dated February 28, 2014 – Hurd Submitting Reconsideration Reply Comments
C14-1	TYSKERUD, G (TYSKERUD) Letter dated October 22, 2013 - Request for Intervener status
C14-2	Letter dated November 6, 2013 – Tyskerud Request for Filing Extension
C14-3	Letter dated November 28, 2013 – Tyskerud Submitting Comments regarding BC Hydro Responses
C15-1	WARDER, R (WARDER) Letter dated October 22, 2013 - Request for Intervener status
C15-2	Letter dated November 16, 2013 – Warder Submitting Comments regarding BC Hydro Extension Request
C16-1	BARBISAN, D (BARBISAN) Letter dated October 24, 2013 - Request for Intervener status
C16-2	Letter dated November 18, 2013 – Barbisan Submitting request to reconsider decisions of order G-167-13
C16-3	Letter dated December 20, 2013 – Barbisan Submitting IR No. 2
C16-4	Letter Dated February 14, 2014 – Barbisan Submitting comments regarding Hurd Reconsideration Request of G-168-13
C17-1	LEMAY, P AND COLLINS, M (LEMAY/COLLINS) Letter dated October 23, 2013 - Request for Intervener status
C18-1	McKECHNIE, B (McKECHNIE) Letter dated October 23, 2013 - Request for Intervener status

Exhibit No.	Description
C18-2	Letter Dated February 14, 2014 – McKechnie Submitting comments regarding Hurd Reconsideration Request of G-168-13
C19-1	MIDDLETON, R (MIDDLETON) Letter dated October 23, 2013 - Request for Intervener status
C19-2	Letter dated November 5, 2013 – Middleton Submitting Information Request No. 1
C19-3	Letter dated December 19, 2013 – Middleton Submitting IR No. 2
C19-4	Letter dated February 12, 2014 - Middleton comments regarding Hurd Reconsideration Request of G-168-13
C19-5	Letter Dated March 13, 2014 – Middleton submission regarding Exhibit A-18
C20-1	QUINN, J (QUINN) Letter dated October 24, 2013 - Request for Intervener status
C21-1	SAMOIL, T (SAMOIL) Letter dated October 25, 2013 - Request for Intervener status
C21-2	Letter dated October 22, 2013 – Samoil Submitting Letter of Comment
C22-1	SKOGSTAD, J (SKOGSTAD) Letter dated October 23, 2013 - Request for Intervener status
C22-2	Letter dated November 4, 2013 – Skogstad Submitting Information Request No. 1
C22-3	Letter dated November 15, 2013 – Skogstad Submitting Comments regarding BC Hydro Extension Request
C22-4	Letter dated November 15, 2013 – Skogstad Submitting Further Comments regarding BC Hydro Extension Request
C22-5	Email dated November 25, 2013 – Query regarding failed installation charge if no legacy meter is available
C22-6	Letter dated December 19, 2013 – Skogstad Submitting Information Request No. 2
C23-1	SPOGLIARICH, R AND S (SPOGLIARICH) Letter dated October 24, 2013 - Request for Intervener status
C23-2	Letter dated December 19, 2013 - Spogliarich Submitting Letter of Comment
C24-1	WONG, D (WONG) Letter dated October 23, 2013 - Request for Intervener status
C24-2	Letter dated November 6, 2013 – Wong Submitting Information Request No. 1

Exhibit No.	Description
C24-3	Letter dated November 15, 2013 – Wong Submitting Comments regarding BC Hydro Extension Request
C24-4	Email dated December 1, 2013 – Request BCUC to address responses in BCUC IRs 1.5.4 and 1.7.1 and Wong IRs 1.5.6 and 1.2.2
C24-5	Letter dated December 20, 2013 – Wong Submitting IR No. 2
C25-1	DISTRICT OF METCHOSIN (DM) Letter dated October 24, 2013 - Request for Intervener status by John Ranns
C25-2	Letter dated December 20, 2013 – DM Submitting IR No. 2
C26-1	STACHOW, J (STACHOW) Letter dated October 24, 2013 - Request for Intervener status
C26-2	Letter dated November 6, 2013 – Stachow Submitting Information Request No. 1
C26-3	Letter dated November 15, 2013 – Stachow Submitting Comments regarding BC Hydro Extension Request
C26-4	Letter dated December 20, 2013 – Stachow Submitting IR No. 2
C26-5	Letter Dated February 14, 2014 – Stachow Submitting comments regarding Hurd Reconsideration Request of G-168-13
C27-1	DE BRUIJN, M (DE BRUIJN) Letter dated October 23, 2013 - Request for Intervener status
C27-2	Letter dated October 13, 2013 - De Bruijn Submitting Comments
C28-1	DUNCAN, D (DUNCAN) Letter dated October 15, 2013 - Request for Intervener status
C28-2	Letter dated October 23, 2013 - Duncan Submitting Comments
C28-3	Letter dated October 9, 2013 – Duncan Submitting Letter of Comment
C29-1	MANSELL, JO AND B (MANSELL) Letter dated October 14, 2013 - Request for Intervener status
C29-2	Letter dated October 22, 2013 - Mansell Submitting Comments
C29-3	Letter dated November 27, 2013 - Mansell Submitting Comments
C29-4	Letter dated December 13, 2013 - Mansell Submitting IR No. 2

Exhibit No.	Description
C29-4-1	Letter dated December 13, 2013 - Mansell Submitting Additional IR No. 2
C29-5	Letter dated February 5, 2014 - Mansell comments regarding Hurd Reconsideration Request of G-168-13
C30-1	MARCHANT, P (MARCHANT) Letter dated October 18, 2013 - Request for Intervener status
C30-2	Letter dated November 15, 2013 – Marchant request to change status to Interested Party
C30-3	Letter Dated February 14, 2014 – Marchant Submitting comments regarding Hurd Reconsideration Request of G-168-13
C31-1	POLDEN, R (POLDEN) Letter dated October 24, 2013 - Request for Intervener status
C31-2	Letter dated November 6, 2013 – Polden Submitting Information Request No. 1
C31-3	Letter dated November 27, 2013 - Polden Submitting Letter of Comment
C31-4	Letter dated December 2, 2013 – Polden Submitting Support regarding Request for BC Hydro to accelerate timing of responses to select BCSEA IRs and Wong
C31-5	Letter dated December 19, 2013 - Polden Submitting Letter of Comment
C31-6	Email dated December 20, 2013 – Polden Submitting Information Request No. 2
C31-7	Letter Dated February 13, 2014 – Polden Submitting comments regarding Hurd Reconsideration Request of G-168-13
C32-1	RYDER, N (RYDER) Letter dated October 22, 2013 - Request for Intervener status
C32-2	Letter dated October 29, 2013 – Ryder Submitting Information Request No. 1
C32-3	Letter dated November 6, 2013 – Ryder re-submitting Information Request No. 1
C33-1	STANLEY, T (STANLEY) Letter dated October 22, 2013 - Request for Intervener status
C33-2	Letter dated February 13, 2014 – Stanley Submitting Comments
C34-1	Fountain, Lesley (Fountain) Letter dated October 22, 2013 - Request for Intervener status
C34-2	Letter dated November 1, 2013 - Request for change to Interested Party from Intervener status

Exhibit No.	Description
C35-1	WIKSTROM, CHRISTINE (WIKSTROM) Letter dated October 22, 2013 - Request for Intervener status
C35-2	Letter dated October 16, 2013 – Wikstrom Submitting Letter of Comment

INTERESTED PARTY DOCUMENTS

D-1	ACCENTURE BUSINESS SERVICES OF BRITISH COLUMBIA Letter Dated October 17, 2013 – Interested Party registration request from Janet Clark
D-2	BAKER, T Letter Dated October 16, 2013 – Interested Party on-line registration and comments
D-2-1	Baker – Letter of Comment dated November 18, 2013
D-3	HAGENBRING, M Letter Dated October 15, 2013 – Interested Party on-line registration and comments
D-4	FLOODY, D Letter Dated October 16, 2013 – Interested Party on-line registration representing Stop Smart Meters BC and comments
D-5	WATERHOUSE, D Letter Dated October 17, 2013 – Interested Party on-line registration and comments
D-5-1	Waterhouse, D – Letter of Comment dated October 22, 2013
D-5-2	Waterhouse, D – Letter of Comment dated October 24, 2013
D-5-3	Waterhouse, D – Letter of Comment dated October 24, 2013
D-5-4	Waterhouse, D – Letter of Comment dated November 10, 2013
D-5-5	Waterhouse, D – Letter of Comment dated November 13, 2013
D-5-6	Waterhouse, D – Letter of Comment dated November 17, 2013
D-5-7	Waterhouse, D – Letter of Comment dated November 18, 2013
D-5-8	Waterhouse, D – Letter of Comment dated November 19, 2013
D-5-9	Waterhouse, D – Letter of Comment dated November 21, 2013
D-5-10	Waterhouse, D – Letter of Comment dated November 21, 2013

Exhibit No.	Description
D-5-11	Waterhouse, D – Letter of Comment dated November 22, 2013
D-5-12	Waterhouse, D – Letter of Comment dated November 24, 2013
D-5-13	Waterhouse, D – Letter of Comment dated November 18, 2013
D-5-14	Waterhouse, D – Letter of Comment dated November 20, 2013
D-5-15	Waterhouse, D – Letter of Comment dated November 24, 2013
D-5-16	Waterhouse, D – Letter of Comment dated November 24, 2013
D-5-17	Waterhouse, D – Letter of Comment dated November 23, 2013
D-5-18	Waterhouse, D – Letter of Comment dated December 9, 2013
D-5-19	Waterhouse, D – Letter of Comment dated January 16, 2014
D-5-20	Waterhouse, D – Letter of Comment dated January 14, 2014
D-5-21	Waterhouse, D – Letter of Comment dated January 15, 2014
D-5-22	Waterhouse, D – Letter of Comment dated February 7, 2014
D-5-23	Waterhouse, D – Letter of Comment dated February 14, 2014
D-6	BURGESS, D Letter Dated October 20, 2013 – Interested Party on-line registration and comments
D-7	COLTON, P Letter Dated October 18, 2013 – Interested Party on-line registration
D-8	Hall, Norm and Carol Letter Dated October 25, 2013 – Interested Party on-line registration
D-8-1	Hall – Letter of Comment dated October 22, 2013
D-8-2	Hall – Letter of Comment dated November 15, 2013
D-9	Allen, Jack Letter Dated October 25, 2013 – Interested Party on-line registration
D-10	Andreassen, K Letter Dated October 24, 2013 – Interested Party on-line registration and comments

Exhibit No.	Description
D-11	Andrus, C Letter Dated October 25, 2013 – Interested Party on-line registration and comments
D-12	REMOVED Letter Dated October 25, 2013 – Interested Party on-line registration
D-13	Archambault, L Letter Dated October 9, 2013 – Interested Party registration
D-13-1	Archambault – Letter of Comment dated October 17, 2013
D-14	Austin, S Letter Dated October 17, 2013 – Interested Party on-line registration
D-14-1	Letter Dated November 1, 2013 – Austin Submitting Letter of Comment
D-14-2	Letter Dated October 17, 2013 – Austin Submitting Letter of Comment
D-15	Bauman, A Letter Dated October 24, 2013 – Interested Party on-line registration and comments
D-15-1	Bauman – Letter of Comment dated October 23, 2013
D-15-2	Bauman – Letter of Comment dated December 19, 2013
D-16	Bednarz, P Letter Dated October 25, 2013 – Interested Party on-line registration
D-17	Bennett, N Letter Dated October 25, 2013 – Interested Party on-line registration
D-18	Beran, S Letter Dated October 25, 2013 – Interested Party on-line registration
D-18-1	Beran – Letter of Comment dated October 24, 2013
D-19	Bowman, J Letter Dated October 24, 2013 – Interested Party registration and comments
D-20	Bright, C Letter Dated October 17, 2013 – Interested Party on-line registration
D-20-1	Bright – Letter of Comment dated October 17, 2013
D-21	Brophy, M Letter Dated October 24, 2013 – Interested Party registration and comments
D-22	REMOVED - Letter Dated October 24, 2013 – Interested Party registration and comments
D-23	Campbell, C Letter Dated October 18, 2013 – Interested Party on-line registration and comments

Exhibit No.	Description
D-24	Cardy, V Letter Dated October 25, 2013 – Interested Party on-line registration
D-25	Chadwick, Bette and Musser, Lawrence Letter Dated October 24, 2013 – Interested Party registration and comments
D-26	Chesham, J Letter Dated October 23, 2013 – Interested Party registration and comments
D-27	Chisholm, R Letter Dated October 24, 2013 – Interested Party on-line registration and comments
D-28	Chua, J Letter Dated October 24, 2013 – Interested Party on-line registration
D-28-1	Chua – Form Letter of Comment dated October 23, 2013
D-29	Cossever, R Letter Dated October 17, 2013 – Interested Party on-line registration
D-29-1	Cossever – Form Letter of Comment dated October 16, 2013
D-30	Craven, D Letter Dated October 24, 2013 – Interested Party on-line registration and comments
D-31	Cripps, D Letter Dated October 25, 2013 – Interested Party on-line registration
D-32	Crozier, N Letter Dated October 25, 2013 – Interested Party on-line registration
D-32-1	Crozier – Letter of Comment dated October 23, 2013
D-33	Dalton, D Letter Dated October 18, 2013 – Interested Party on-line registration and comments
D-34	Davidson, S Letter Dated October 18, 2013 – Interested Party on-line registration and comments
D-35	DeReus, M Letter Dated October 25, 2013 – Interested Party on-line registration
D-35-1	DeReus – Letter of Comment dated October 23, 2013
D-36	Dube, N Letter Dated October 24, 2013 – Interested Party on-line registration
D-37	Duncan, R Letter Dated October 25, 2013 – Interested Party on-line registration and comments
D-38	Dyke, Bonnita and Cornel Letter Dated October 24, 2013 – Interested Party on-line registration and comments

Exhibit No.	Description
D-39	Eadie, P Letter Dated October 25, 2013 – Interested Party on-line registration
D-40	Farah, C Letter Dated October 24, 2013 – Interested Party on-line registration
D-40-1	Farah – Letter of Comment dated October 23, 2013
D-41	Fidler, B Letter Dated October 24, 2013 – Interested Party on-line registration
D-41-1	Fidler – Letter of Comment dated October 23, 2013
D-42	Finigan, K Letter Dated October 25, 2013 – Interested Party on-line registration
D-42-1	Finigan – Letter of Comment dated October 24, 2013
D-43	Floyd, L Letter Dated October 24, 2013 – Interested Party on-line registration
D-43-1	Floyd – Letter of Comment dated October 23, 2013
D-44	Fraser, Martha and Erickson, Manuel Letter Dated October 24, 2013 – Interested Party registration
D-45	Frittaion, J Letter Dated October 23, 2013 – Interested Party on-line registration and comments
D-45-1	Frittaion – Form Letter of Comment dated October 23, 2013
D-46	Frost, L Letter Dated October 24, 2013 – Interested Party on-line registration
D-47	Fyfe, T Letter Dated October 17, 2013 – Interested Party on-line registration and comments
D-48	Gangji, P Letter Dated October 25, 2013 – Interested Party on-line registration
D-48-1	Gangji – Letter of Comment dated November 16, 2013
D-49	Garnett, D Letter Dated October 23, 2013 – Interested Party on-line registration and comments
D-49-1	Garnett – Letter of Comment dated Garnett December 9, 2013
D-50	Gilbey, B Letter Dated October 25, 2013 – Interested Party on-line registration
D-51	Grant, Erynne and David Letter Dated October 24, 2013 – Interested Party on-line registration

Exhibit No.	Description
D-51-1	Grant –Letter of Comment dated October 24, 2013
D-52	Grogan, J Letter Dated October 24, 2013 – Interested Party registration and comments
D-52-1	Grogan – Letter of Comment dated December 8, 2013
D-52-2	Grogan – Letter of Comment dated December 18, 2013
D-53	Hamilton, I Letter Dated October 19, 2013 – Interested Party on-line registration and comments
D-54	Albury, L Letter Dated October 23, 2013 – Interested Party on-line registration
D-54-1	Albury – Letter of Comment dated October 24, 2013
D-55	Cottrell, A Letter Dated October 23, 2013 – Interested Party on-line registration
D-55-1	Cottrell – Form Letter of Comment dated October 21, 2013
D-56	Barreca, D Letter Dated October 20, 2013 – Interested Party on-line registration
D-56-1	Barreca – Letter of Comment dated October 20, 2013
D-57	Barreca, Lisa and Singh, Richard Letter Dated October 20, 2013 – Interested Party on-line registration and comments
D-58	Beck, R Letter Dated October 23, 2013 – Interested Party on-line registration
D-58-1	Beck, R Letter dated December 19, 2013 – Letter of Comment
D-59	Bogdanich, J Letter Dated October 23, 2013 – Interested Party on-line registration
D-59-1	Bogdanich – Letter of Comment dated October 23, 2013
D-59-2	Bogdanich – Letter of Comment dated February 9, 2014
D-60	Chesham, J Letter Dated October 23, 2013 – Interested Party on-line registration and comments
D-61	Daniel, B Letter Dated October 23, 2013 – Interested Party registration and comments
D-62	de la Verde, I Letter Dated October 23, 2013 – Interested Party on-line registration

Exhibit No.	Description
D-62-1	de la Verde – Letter of Comment dated October 23, 2013
D-63	Denison, D Letter Dated October 23, 2013 – Interested Party on-line registration
D-63-1	Denison – Letter of Comment dated October 22, 2013
D-64	de Sousa, E Letter Dated October 23, 2013 – Interested Party on-line registration
D-64-1	de Sousa – Letter of Comment dated October 22, 2013
D-65	Ewart, L Letter Dated October 23, 2013 – Interested Party on-line registration
D-65-1	Ewart – Letter of Comment dated October 22, 2013
D-66	Glass, D Letter Dated October 22, 2013 – Interested Party on-line registration and comments
D-67	Ronczewski, G Letter Dated October 23, 2013 – Interested Party on-line registration
D-68	Hammill, J Letter Dated October 23, 2013 – Interested Party on-line registration
D-68-1	Hammill – Form Letter of Comment dated October 22, 2013
D-69	Harlow, P Letter Dated October 23, 2013 – Interested Party on-line registration and comments
D-70	Henderson, M Letter Dated October 24, 2013 – Interested Party on-line registration and comments
D-71	Hengst, H Letter Dated October 24, 2013 – Interested Party on-line registration and comments
D-72	Hengst, R Letter Dated October 23, 2013 – Interested Party on-line registration and comments
D-73	Hipwell, J Letter Dated October 17, 2013 – Interested Party on-line registration
D-74	Holman, Lee Ann Letter Dated October 25, 2013 – Interested Party on-line registration and comments
D-75	Horvath, P Letter Dated October 23, 2013 – Interested Party on-line registration
D-75-1	Horvath – Form Letter of Comment dated October 20, 2013
D-76	Hrankowski, A Letter Dated October 24, 2013 – Interested Party on-line registration

Exhibit No.	Description
D-76-1	Hrankowski – Letter of Comment dated October 24, 2013
D-77	Ivanovic, R Letter Dated October 24, 2013 – Interested Party on-line registration
D-78	Jefferson, Kathleen and White, Robert Letter Dated October 24, 2013 – Interested Party registration and comments
D-79	Jefferson, M Letter Dated October 24, 2013 – Interested Party registration and comments
D-80	Jones, J Letter Dated October 24, 2013 – Interested Party on-line registration and comments
D-80-1	Jones – Letter of Comment dated November 9, 2013
D-81	Kaljur, S Letter Dated October 16, 2013 – Interested Party on-line registration and comments
D-81-1	Letter Dated November 1, 2013 – Kaljur Submitting Letter of Comment
D-82	Kartar, L Letter Dated October 24, 2013 – Interested Party on-line registration
D-82-1	Kartar – Letter of Comment dated October 24, 2013
D-83	Kennedy, M Letter Dated October 18, 2013 – Interested Party on-line registration and comments
D-84	Kerr, P Letter Dated October 24, 2013 – Interested Party registration and comments
D-85	Kirby, Jim and Linda Letter Dated October 23, 2013 – Interested Party registration and comments
D-85-1	Kirby – Letter of Comment dated November 15, 2013
D-86	Korosec, I Letter Dated October 23, 2013 – Interested Party on-line registration
D-86-1	Korosec – Letter of Comment dated October 23, 2013
D-86-2	Korosec – Letter of Comment dated December 19, 2013
D-87	Kostiwi, S Letter Dated October 25, 2013 – Interested Party on-line registration
D-87-1	Kostiwi, S Letter of Comment Dated October 27, 2013

Exhibit No.	Description
D-88	Kratzmann, B Letter Dated October 24, 2013 – Interested Party on-line registration and comments
D-89	Kyle, B Letter Dated October 24, 2013 – Interested Party on-line registration and comments
D-90	Latimer, A Letter Dated October 17, 2013 – Interested Party on-line registration and comments
D-91	Levey, M Letter Dated October 23, 2013 – Interested Party on-line registration
D-91-1	Levey, M – Letter of Comment dated February 7, 2014
D-92	Lock, E Letter Dated October 24, 2013 – Interested Party on-line registration
D-93	Loughhead, R Letter Dated October 21, 2013 – Interested Party on-line registration and comments
D-94	Lyons, B -Letter Dated October 20, 2013 – Interested Party on-line registration and comments
D-94-1	Lyons, B – Letter of Comment dated October 20, 2013
D-94-2	Lyons – Letter of Comment dated November 15, 2013
D-95	MacGillivray, A Letter Dated October 25, 2013 – Interested Party on-line registration
D-95-1	MacGillivray – Letter of Comment dated November 1, 2013
D-96	Macomber, E Letter Dated October 23, 2013 – Interested Party on-line registration
D-96-1	Macomber – Letter of Comment dated November 1, 2013
D-97	Marshall, L Letter Dated October 24, 2013 – Interested Party registration and comments
D-98	Mastin, L Letter Dated October 24, 2013 – Interested Party on-line registration
D-98-1	Mastin – Letter of Comment dated November 29, 2013
D-99	McGregor, M Letter Dated October 25, 2013 – Interested Party on-line registration
D-99-1	McGregor – Letter of Comment dated October 24, 2013

Exhibit No.	Description
D-100	Meller, M Letter Dated October 24, 2013 – Interested Party on-line registration and comments
D-101	Mellors, Jim Letter Dated October 19, 2013 – Interested Party registration and comments
D-102	Moen, Shannon Letter Dated October 23, 2013 – Interested Party on-line registration
D-102-1	Moen – Letter of Comment dated October 23, 2013
D-103	Moore, Kathy Letter Dated October 25, 2013 – Interested Party on-line registration
D-104	Brandenn, N Letter Dated October 25, 2013 – Interested Party on-line registration
D-104-1	Brandenn – Letter of Comment dated October 23, 2013
D-105	Nelson, B Letter Dated October 25, 2013 – Interested Party on-line registration
D-106	Newbery, T Letter Dated October 25, 2013 – Interested Party on-line registration
D-106-1	Newbery – Letter of Comment dated October 21, 2013
D-107	Ng, Wilson Letter Dated October 25, 2013 – Interested Party on-line registration
D-108	Onsorge, L Letter Dated October 24, 2013 – Interested Party on-line registration
D-108-1	Onsorge – Letter of Comment dated October 24, 2013
D-109	Orsatti, S Letter Dated October 23, 2013 – Interested Party on-line registration
D-110	Osborne, D Letter Dated October 25, 2013 – Interested Party on-line registration
D-111	Pajger, Marika Letter Dated October 21, 2013 – Interested Party registration and comments
D-112	Pelikan, Lenka Letter Dated October 23, 2013 – Interested Party on-line registration and comments
D-113	Pfister, Charlotte Letter Dated October 23, 2013 – Interested Party on-line registration
D-114	Platt, Leonard Letter Dated October 23, 2013 – Interested Party registration and comments

Exhibit No.	Description
D-115	Powell, Jim Letter Dated October 18, 2013 – Interested Party registration and comments
D-116	Prosser, Loretta Letter Dated October 21, 2013 – Interested Party registration and comments
D-117	Quint, Harriet Letter Dated October 23, 2013 – Interested Party on-line registration
D-118	Renouf, Judith Letter Dated October 25, 2013 – Interested Party on-line registration
D-118-1	Renouf – Letter of Comment dated October 24, 2013
D-119	Resels, Jack Letter Dated October 18, 2013 – Interested Party on-line registration
D-119-1	Resels, Jack – Letter of Comment dated October 24, 2013
D-120	Resels, Ray Letter Dated October 18, 2013 – Interested Party on-line registration
D-120-1	Resels, Ray – Letter of Comment dated October 24, 2013
D-121	Riedlinger, Robert Letter Dated October 23, 2013 – Interested Party on-line registration
D-121-1	Riedlinger – Letter of Comment dated October 18, 2013
D-121-2	Riedlinger – Letter of Comment dated November 12, 201
D-121-3	Riedlinger – Letter of Comment dated December 11, 2013
D-121-4	Riedlinger – Letter of Comment dated February 11, 2014
D-122	Robinson, Russ Letter Dated October 25, 2013 – Interested Party on-line registration
D-122-1	Robinson – Letter of Comment dated October 24, 2013
D-123	Roi, Dorothy Letter Dated October 25, 2013 – Interested Party on-line registration
D-123-1	Roi – Letter of Comment dated November 13, 2013
D-123-2	Roi – Letter of Comment dated November 28, 2013
D-123-3	Roi – Letter of Comment dated December 20, 2013
D-124	Rosser, John Letter Dated October 23, 2013 – Interested Party on-line registration

Exhibit No.	Description
D-124-1	Rosser – Letter of Comment dated October 23, 2013
D-125	Ross, June Letter Dated October 17, 2013 – Interested Party on-line registration and comments
D-126	Ryder, Bruce Letter Dated October 24, 2013 – Interested Party registration
D-126-1	Ryder, B – Letter of Comment dated November 5, 2013
D-127	Ryder, Nancy Letter Dated October 24, 2013 – Interested Party registration and comments
D-127-1	Ryder, Nancy – Letter of Comment dated October 24, 2013
D-128	Santa, Jackie Letter Dated October 20, 2013 – Interested Party registration
D-128-1	Santa, Jackie Letter of Comment dated October 20, 2013
D-129	Schryburt, Patrick Letter Dated October 25, 2013 – Interested Party on-line registration
D-129-1	Schryburt – Letter of Comment dated October 24, 2013
D-130	Shaler, Evan Letter Dated October 25, 2013 – Interested Party on-line registration
D-130-1	Shaler – Letter of Comment dated October 17, 2013
D-131	Shaw, L Letter Dated October 23, 2013 – Interested Party on-line registration and comments
D-131-1	Shaw – Letter of Comment dated November 7, 2013
D-132	Smith, K Letter Dated October 24, 2013 – Interested Party on-line registration
D-133	Smith, V Letter Dated October 23, 2013 – Interested Party on-line registration and comments
D-134	Stevens, Z Letter Dated October 24, 2013 – Interested Party registration
D-135	Stiff, H Letter Dated October 23, 2013 – Interested Party on-line registration
D-135-1	Stiff – Letter of Comment dated October 23, 2013
D-136	Stobie, M Letter Dated October 21, 2013 – Interested Party on-line registration and comments

Exhibit No.	Description
D-137	Stoll, A Letter Dated October 24, 2013 – Interested Party on-line registration and comments
D-137-1	Stoll – Letter of Comment dated October 24, 2013
D-137-2	Stoll – Letter of Comment dated November 17, 2013
D-138	Sywak, V Letter Dated October 23, 2013 – Interested Party on-line registration
D-138-1	Sywak – Letter of Comment dated October 22, 2013
D-138-2	Sywak – Letter of Comment dated December 11, 2013
D-138-3	Sywak – Letter of Comment dated December 19, 2013
D-138-4	Sywak – Letter of Comment dated December 17, 2013
D-138-5	Sywak – Letter of Comment dated December 20, 2013
D-139	Szpila, Z Letter Dated October 25, 2013 – Interested Party on-line registration
D-140	Taylor, M Letter Dated October 23, 2013 – Interested Party on-line registration
D-140-1	Taylor – Letter of Comment dated October 22, 2013
D-140-2	Taylor – Letter of Comment dated December 15, 2013
D-141	Taylor Proctor, G Dated October 25, 2013 – Interested Party on-line registration
D-142	Teuschler, L Dated October 17, 2013 – Interested Party on-line registration and comments
D-143	Thompson, B Letter Dated October 19, 2013 – Interested Party registration and comments
D-144	Toews, D Letter Dated October 24, 2013 – Interested Party on-line registration
D-144-1	Toews – Letter of Comment dated November 4, 2013
D-144-2	Toews – Letter of Comment dated November 25, 2013
D-145	Toop, P Letter Dated October 23, 2013 – Interested Party on-line registration
D-145-1	Toop – Letter of Comment dated October 22, 2013

Exhibit No.	Description
D-146	Traynor, K Letter Dated October 23, 2013 – Interested Party on-line registration
D-146-1	Traynor – Letter of Comment dated October 30, 2013
D-147	Unger, W Dated October 25, 2013 – Interested Party on-line registration
D-147-1	Unger – Letter of Comment dated October 22, 2013
D-148	Vidal, C Dated October 25, 2013 – Interested Party on-line registration
D-148-1	Vidal – Letter of Comment dated October 24, 2013
D-149	Warden, P Letter Dated October 23, 2013 – Interested Party on-line registration
D-150	Welsh, D Letter Dated October 23, 2013 – Interested Party on-line registration
D-150-1	Welsh – Letter of Comment dated October 24, 2013
D-151	White, S Letter Dated October 17, 2013 – Interested Party on-line registration
D-152	Wilson, C Letter Dated October 25, 2013 – Interested Party registration
D-153	Winter, S Letter Dated October 17, 2013 – Interested Party on-line registration
D-154	Wood, M Letter Dated October 24, 2013 – Interested Party registration and comments
D-155	Zeilstra, H Letter Dated October 23, 2013 – Interested Party registration and comments
D-155-1	Zeilstra – Letter of Comment Dated December 19, 2013 and Information Request
D-156	Zilberts, M Letter Dated October 23, 2013 – Interested Party on-line registration
D-156-1	Zilberts – Letter of Comment dated October 9, 2013
D-157	Fountain, Lesley Letter dated November 1, 2013 - Request for change to Interested Party from Intervener status
D-158	Pongratz-Doyle, Jeanette Letter dated November 9, 2013 - Request for Interested Party
D-158-1	Pongratz-Doyle – Letter of Comment dated November 19, 2013
D-158-2	Pongratz-Doyle – Letter of Comment dated November 19, 2013

Exhibit No.	Description
D-159	Letter dated November 15, 2013 – Marchant request to change from Intervener status to Interested Party
D-159-1	Letter Dated November 22, 2013 – Marchant Submitting Letter of Comment
D-159-2	Marchant – Letter of Comment dated December 12, 2013

LETTERS OF COMMENT

E-1	Acheson, L Letter of Comment dated October 26, 2013 – Redacted version on web only
E-2	Adams, D Letter of Comment dated October 31, 2013 – Redacted version on web only
E-3	Adrian, Dan and Sarah Letter of Comment dated October 24, 2013 – Redacted version on web only
E-4	Aitchison, E Letter of Comment dated October 18, 2013 – Redacted version on web only
E-5	Andersen, T Letter of Comment dated October 12, 2013 – Redacted version on web only
E-6	Anderson, B Letter of Comment dated October 23, 2013 – Redacted version on web only
E-7	Anglin, L Letter of Comment dated October 21, 2013 – Redacted version on web only
E-7-1	Anglin, L Letter of Comment dated November 1, 2013 – Redacted version on web only
E-7-2	Anglin, L Letter of Comment dated November 9, 2013 – Redacted version on web only
E-8	Askey, L Letter of Comment dated November 10, 2013 – Redacted version on web only
E-9	Annett, R Letter of Comment dated October 30, 2013 – Redacted version on web only

Exhibit No.	Description
E-9-1	Annett, R Letter of Comment dated November 18, 2013 – Redacted version on web only
E-9-2	Annett, R Letter of Comment dated December 9, 2013 – Redacted version on web only
E-10	Archer, C Letter of Comment dated October 18, 2013 – Redacted version on web only
E-11	Leontin Atanasiu, V Letter of Comment dated October 24, 2013 – Redacted version on web only
E-12	Attorp, Frants and Jean Letter of Comment dated October 9, 2013 – Redacted version on web only
E-12-1	Attorp, Frants and Jean Letter of Comment dated November 16, 2013 – Redacted version on web only
E-12-2	Attorp, F Letter of Comment dated December 3, 2013 – Redacted version on web only
E-13	Austin, P Letter of Comment dated October 24, 2013 – Redacted version on web only
E-14	Ballantine, L and James, W Letter of Comment dated October 21, 2013 – Redacted version on web only
E-15	Ballash, N Letter of Comment dated October 24, 2013 – Redacted version on web only
E-16	Ball, D Letter of Comment dated October 24, 2013 – Redacted version on web only
E-17	Banman, M Letter of Comment dated October 24, 2013 – Redacted version on web only
E-18	Bannister, ML Letter of Comment dated October 23, 2013 – Redacted version on web only
E-19	Barnes, K Letter of Comment dated October 12, 2013 – Redacted version on web only
E-20	Barnett, L Letter of Comment dated October 22, 2013 – Redacted version on web only

Exhibit No.	Description
E-21	Barone, P Letter of Comment dated October 21, 2013 – Redacted version on web only
E-22	Barteluk, WDM Letter of Comment dated October 15, 2013 – Redacted version on web only
E-23	Bassett, Giles and Cassandra Letter of Comment dated October 16, 2013 – Redacted version on web only
E-24	Beadle, M Letter of Comment dated October 24, 2013 – Redacted version on web only
E-25	Beattie, Elaine and Bruce Letter of Comment dated October 22, 2013 – Redacted version on web only
E-26	Beauchamp, D and Vance, D Letter of Comment dated October 28, 2013 – Redacted version on web only
E-27	Beaudoin, D Letter of Comment dated October 24, 2013 – Redacted version on web only
E-28	Beazley, N Letter of Comment dated October 23, 2013 – Redacted version on web only
E-29	Bentley, L Letter of Comment dated October 23, 2013 – Redacted version on web only
E-30	Berger, V and Hickman, D Letter of Comment dated October 14, 2013 – Redacted version on web only
E-31	Blackmore, A and Duggan, B Letter of Comment dated October 24, 2013 – Redacted version on web only
E-32	Blainey, M Letter of Comment dated October 16, 2013 – Redacted version on web only
E-32-1	Blainey, M Letter of Comment dated October 24, 2013 – Redacted version on web only
E-32-2	Blainey, M Letter of Comment dated November 18, 2013 – Redacted version on web only
E-33	Blake, C Letter of Comment dated November 11, 2013 – Redacted version on web only

Exhibit No.	Description
E-34	Bloomfield, Brian and Judy Letter of Comment dated October 23, 2013 – Redacted version on web only
E-35	Bluin, B Letter of Comment dated October 26, 2013 – Redacted version on web only
E-36	Blum, R Letter of Comment dated October 17, 2013 – Redacted version on web only
E-37	Bodnar, M Letter of Comment dated October 20, 2013 – Redacted version on web only
E-38	Bolin, I Letter of Comment dated October 24, 2013 – Redacted version on web only
E-39	Bolin, Ron and Inge Letter of Comment dated October 23, 2013 – Redacted version on web only
E-40	Bonderove, C Letter of Comment dated October 9, 2013 – Redacted version on web only
E-41	Bordian, Ken and Carol Letter of Comment dated October 24, 2013 – Redacted version on web only
E-41-1	Bordian, Ken and Carol Letter of Comment dated November 20, 2013 – Redacted version on web only
E-42	Bosher, H Letter of Comment dated October 31, 2013 – Redacted version on web only
E-42-1	Bosher, H Letter of Comment dated October 18, 2013 – Redacted version on web only
E-43	Bottomley, Peter and Keiko Letter of Comment dated October 20, 2013 – Redacted version on web only
E-44	Bowie, S Letter of Comment dated October 23, 2013 – Redacted version on web only
E-45	Bowler, C Letter of Comment dated October 24, 2013 – Redacted version on web only
E-46	Bowman, C Letter of Comment dated October 16, 2013 – Redacted version on web only

Exhibit No.	Description
E-47	Boyd, C Letter of Comment dated October 23, 2013 – Redacted version on web only
E-48	Boyd, G, Dube, S, and Dube, N Letter of Comment dated October 23, 2013 – Redacted version on web only
E-49	Brach, Bil Letter of Comment dated October 24, 2013 – Redacted version on web only
E-50	Bradley, J Letter of Comment dated October 17, 2013 – Redacted version on web only
E-51	Brice, V Letter of Comment dated October 18, 2013 – Redacted version on web only
E-52	Brighton, G Letter of Comment dated October 17, 2013 – Redacted version on web only
E-53	Bromley, L Letter of Comment dated November 4, 2013 – Redacted version on web only
E-54	Brown, D Letter of Comment dated October 18, 2013 – Redacted version on web only
E-54-1	Brown, D Letter of Comment dated October 20, 2013 – Redacted version on web only
E-55	Brown, H Letter of Comment dated October 16, 2013 – Redacted version on web only
E-55-1	Brown, H Letter of Comment dated December 16, 2013 – Redacted version on web only
E-56	Brumell, AC Letter of Comment dated October 24, 2013 – Redacted version on web only
E-56-1	Brumell, AC Letter of Comment dated November 6, 2013 – Redacted version on web only
E-57	Bruton, S Letter of Comment dated October 25, 2013 – Redacted version on web only
E-58	Buckham, G Letter of Comment dated October 24, 2013 – Redacted version on web only

Exhibit No.	Description
E-59	Buckham, L, and Walilko, M Letter of Comment dated October 23, 2013 – Redacted version on web only
E-60	Burroughs, C Letter of Comment dated October 23, 2013 – Redacted version on web only
E-61	Byers, D Letter of Comment dated October 24, 2013 – Redacted version on web only
E-61-1	Byers, D Letter of Comment dated December 19, 2013 – Redacted version on web only
E-62	Caldwell, J Letter of Comment dated October 25, 2013 – Redacted version on web only
E-63	Carman, M Letter of Comment dated November 4, 2013 – Redacted version on web only
E-64	Carson, S Letter of Comment dated October 24, 2013 – Redacted version on web only
E-65	Weisgarber, L Letter of Comment dated October 25, 2013 – Redacted version on web only
E-65-1	Weisgarber, L Letter of Comment dated November 25, 2013 – Redacted version on web only
E-66	Case, W Letter of Comment dated October 16, 2013 – Redacted version on web only
E-67	Charland, C Letter of Comment dated October 24, 2013 – Redacted version on web only
E-68	Cherry, S Letter of Comment dated October 21, 2013 – Redacted version on web only
E-69	Chow, A Letter of Comment dated October 21, 2013 – Redacted version on web only
E-70	Churchill, A Letter of Comment dated October 21, 2013 – Redacted version on web only
E-70-1	Churchill, A Letter of Comment dated December 10, 2013 – Redacted version on web only

Exhibit No.	Description
E-71	Ciocea, L Letter of Comment dated October 23, 2013 – Redacted version on web only
E-72	Clapperton, David and Inge Letter of Comment dated October 26, 2013 – Redacted version on web only
E-73	Clark Letter of Comment dated October 22, 2013 – Redacted version on web only
E-74	Clark, L Letter of Comment dated October 20, 2013 – Redacted version on web only
E-75	Clark, M Letter of Comment dated October 18, 2013 – Redacted version on web only
E-76	Clavier, I Letter of Comment dated October 28, 2013 – Redacted version on web only
E-77	Coleman, R Letter of Comment dated October 23, 2013 – Redacted version on web only
E-78	Conarroe, C Letter of Comment dated October 28, 2013 – Redacted version on web only
E-79	Conway, G Letter of Comment dated October 23, 2013 – Redacted version on web only
E-80	Cooney, Tricia and Jeff Letter of Comment dated October 24, 2013 – Redacted version on web only
E-81	Cooper, Greg and Donita Letter of Comment dated October 21, 2013 – Redacted version on web only
E-82	Cooper, R Letter of Comment dated October 23, 2013 – Redacted version on web only
E-82-1	Cooper, R Letter of Comment dated October 23, 2013 – Redacted version on web only
E-83	Cork, D Letter of Comment dated October 24, 2013 – Redacted version on web only
E-84	Cornish, D Letter of Comment dated October 24, 2013 – Redacted version on web only
E-85	Crommelin, M Letter of Comment dated October 11, 2013 – Redacted version on web only

Exhibit No.	Description
E-86	Crowley, C Letter of Comment dated October 21, 2013 – Redacted version on web only
E-87	Cundliffe, J Letter of Comment dated October 21, 2013 – Redacted version on web only
E-88	Cunningham, Alana and Ian Letter of Comment dated October 24, 2013 – Redacted version on web only
E-89	Curle, G Letter of Comment dated October 21, 2013 – Redacted version on web only
E-90	Dalley, A Letter of Comment dated October 23, 2013 – Redacted version on web only
E-91	Dalzell, L Letter of Comment dated October 24, 2013 – Redacted version on web only
E-92	Davies, K Letter of Comment dated October 12, 2013 – Redacted version on web only
E-93	Davies, R Letter of Comment dated October 30, 2013 – Redacted version on web only
E-94	Hellyer, D Letter of Comment dated October 17, 2013 – Redacted version on web only
E-95	Dawson, R Letter of Comment dated October 21, 2013 – Redacted version on web only
E-96	Day, P Letter of Comment dated October 24, 2013 – Redacted version on web only
E-97	De Langen, R Letter of Comment dated October 26, 2013 – Redacted version on web only
E-98	Denholm, S Letter of Comment dated October 24, 2013 – Redacted version on web only
E-99	Dennison, R Letter of Comment dated October 18, 2013 – Redacted version on web only
E-100	Diggle, Paul and Shirley Letter of Comment dated October 23, 2013 – Redacted version on web only

Exhibit No.	Description
E-101	Dignard, R Letter of Comment dated October 9, 2013 – Redacted version on web only
E-102	Dilay, N Letter of Comment dated October 17, 2013 – Redacted version on web only
E-102-1	Dilay, N Letter of Comment dated October 23, 2013 – Redacted version on web only
E-102-2	Dilay, N Letter of Comment dated November 29, 2013 – Redacted version on web only
E-102-3	Dilay, N Letter of Comment dated December 18, 2013 – Redacted version on web only
E-103	Dittrich, C Letter of Comment dated October 24, 2013 – Redacted version on web only
E-104	Dom, R Letter of Comment dated October 23, 2013 – Redacted version on web only
E-104-1	Dom, R Letter of Comment dated December 19, 2013 – Redacted version on web only
E-105	Dow, Rick and Jane Letter of Comment dated October 9, 2013 – Redacted version on web only
E-106	Drent, J Letter of Comment dated November 3, 2013 – Redacted version on web only
E-107	Drescher, Inger and Herman Letter of Comment dated October 22, 2013 – Redacted version on web only
E-108	Drinnan, S Letter of Comment dated October 21, 2013 – Redacted version on web only
E-109	Dupont, G Letter of Comment dated October 24, 2013 – Redacted version on web only
E-110	Dupont, L, Webb, D, Boon, J, Boon, P, Boon, S Letter of Comment dated October 28, 2013 – Redacted version on web only
E-110-1	Dupont, L, Boon, J, Boon, S, Webb, D Letter of Comment dated November 16, 2013 – Redacted version on web only

Exhibit No.	Description
E-111	Dureichen, N Letter of Comment dated October 23, 2013 – Redacted version on web only
E-112	Earley, L Letter of Comment dated October 17, 2013 – Redacted version on web only
E-113	Eby, R Letter of Comment dated October 24, 2013 – Redacted version on web only
E-114	Ellema, L Letter of Comment dated November 4, 2013 – Redacted version on web only
E-115	Elston-Tuttle, K Letter of Comment dated October 9, 2013 – Redacted version on web only
E-116	Engar, O Letter of Comment dated October 24, 2013 – Redacted version on web only
E-117	Martinez, E Letter of Comment dated October 19, 2013 – Redacted version on web only
E-118	Ethier, J Letter of Comment dated October 22, 2013 – Redacted version on web only
E-119	Ewacha, S Letter of Comment dated October 17, 2013 – Redacted version on web only
E-119-1	Ewacha, S Letter of Comment dated December 8, 2013 – Redacted version on web only
E-119-2	Ewacha, S Letter of Comment dated December 15, 2013 – Redacted version on web only
E-120	Fabbro, N Letter of Comment dated October 24, 2013 – Redacted version on web only
E-121	Faurot, P Letter of Comment dated October 21, 2013 – Redacted version on web only
E-121-1	Faurot, T Letter of Comment dated November 26, 2013 – Redacted version on web only
E-121-2	Faurot, T Letter of Comment dated November 27, 2013 – Redacted version on web only

Exhibit No.	Description
E-121-3	Faurot, T Letter of Comment dated January 4, 2014 – Redacted version on web only
E-122	Ferguson, H, and Rosen, M Letter of Comment dated October 13, 2013 – Redacted version on web only
E-123	Field, D Letter of Comment dated October 30, 2013 – Redacted version on web only
E-124	Fitzpatrick, R Letter of Comment dated October 17, 2013 – Redacted version on web only
E-124-1	Fitzpatrick, R Letter of Comment dated October 24, 2013 – Redacted version on web only
E-124-2	Fitzpatrick, R Letter of Comment dated November 9, 2013 – Redacted version on web only
E-124-3	Fitzpatrick, R Letter of Comment dated November 12, 2013 – Redacted version on web only
E-124-4	Fitzpatrick, R Letter of Comment dated November 11, 2013 – Redacted version on web only
E-124-5	Fitzpatrick, R Letter of Comment dated November 15, 2013 – Redacted version on web only
E-124-6	Fitzpatrick, R Letter of Comment dated November 16, 2013 – Redacted version on web only
E-124-7	Fitzpatrick, R Letter of Comment dated November 24, 2013 – Redacted version on web only
E-125	Fjaagesund, T Letter of Comment dated October 30, 2013 – Redacted version on web only
E-126	Florence, Ryan and Sharon Letter of Comment dated October 17, 2013 – Redacted version on web only
E-126-1	Florence, R Letter of Comment dated November 16, 2013 – Redacted version on web only
E-127	Foot, P Letter of Comment dated October 17, 2013 – Redacted version on web only
E-127-1	Foot, P Letter of Comment dated November 1, 2013 – Redacted version on web only

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Exhibit No.	Description
E-127-2	Foot, P Letter of Comment dated November 16, 2013 – Redacted version on web only
E-127-3	Foot, P Letter of Comment dated November 25, 2013 – Redacted version on web only
E-128	Forbes, K Letter of Comment dated October 24, 2013 – Redacted version on web only
E-129	Foster, A Letter of Comment dated October 21, 2013 – Redacted version on web only
E-129-1	Foster, A Letter of Comment dated February 6, 2014 – Redacted version on web only
E-130	Fowler, H Letter of Comment dated October 24, 2013 – Redacted version on web only
E-131	Francis, C Letter of Comment dated October 22, 2013 – Redacted version on web only
E-131-1	Francis, C Letter of Comment dated October 13, 2013 – Redacted version on web only
E-132	Francis, L Letter of Comment dated October 18, 2013 – Redacted version on web only
E-133	Fraser, L Letter of Comment dated October 30, 2013 – Redacted version on web only
E-134	Fraser, N Letter of Comment dated October 17, 2013 – Redacted version on web only
E-135	Frisk, T Letter of Comment dated October 24, 2013 – Redacted version on web only
E-136	Fritz, S Letter of Comment dated October 18, 2013 – Redacted version on web only
E-136-1	Fritz, S Letter of Comment dated November 8, 2013 – Redacted version on web only
E-137	Furnell, D, and Wilde, M Letter of Comment dated October 17, 2013 – Redacted version on web only

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Exhibit No.	Description
E-138	Dove, E, and Gagnon, P Letter of Comment dated October 22, 2013 – Redacted version on web only
E-139	Gallas, D Letter of Comment dated October 15, 2013 – Redacted version on web only
E-139-1	Gallas, D Letter of Comment dated October 21, 2013 – Redacted version on web only
E-140	Galloway, Glen and Nola Letter of Comment dated October 23, 2013 – Redacted version on web only
E-141	Garnett, L, and Dudink, N Letter of Comment dated October 16, 2013 – Redacted version on web only
E-141-1	Garnett, L, and Dudink, N Letter of Comment dated October 16, 2013 – Redacted version on web only
E-142	Gary Letter of Comment dated October 18, 2013 – Redacted version on web only
E-143	Gervais, R Letter of Comment dated October 22, 2013 – Redacted version on web only
E-144	Gibson, G Letter of Comment dated October 23, 2013 – Redacted version on web only
E-145	Gibson, K, and Fedor, L Letter of Comment dated October 20, 2013 – Redacted version on web only
E-146	Gil, C Letter of Comment dated October 21, 2013 – Redacted version on web only
E-147	Gilmer, WM Letter of Comment dated October 17, 2013 – Redacted version on web only
E-148	Goldberg, M Letter of Comment dated October 24, 2013 – Redacted version on web only
E-149	Good, D Letter of Comment dated October 17, 2013 – Redacted version on web only
E-150	Griggs, T Letter of Comment dated October 24, 2013 – Redacted version on web only

Exhibit No.	Description
E-151	Grip, William and Joy Letter of Comment dated October 21, 2013 – Redacted version on web only
E-152	Grothoff, Frank and Inga-Britt Letter of Comment dated October 21, 2013 – Redacted version on web only
E-153	Gurm, E Letter of Comment dated October 23, 2013 – Redacted version on web only
E-154	Duncan, G, and Randall, T Letter of Comment dated October 25, 2013 – Redacted version on web only
E-155	Haigh, A Letter of Comment dated October 17, 2013 – Redacted version on web only
E-156	Hallam, W Letter of Comment dated October 17, 2013 – Redacted version on web only
E-157	Hamilton, G Letter of Comment dated October 25, 2013 – Redacted version on web only
E-158	Hanle, I Letter of Comment dated October 24, 2013 – Redacted version on web only
E-159	Hanlon, E Letter of Comment dated October 17, 2013 – Redacted version on web only
E-160	Hanna, D Letter of Comment dated October 20, 2013 – Redacted version on web only
E-160-1	Hanna, D Letter of Comment dated October 21, 2013 – Redacted version on web only
E-160-2	Hanna, D Letter of Comment dated October 24, 2013 – Redacted version on web only
E-160-3	Hanna, D Letter of Comment dated November 10, 2013 – Redacted version on web only
E-160-4	Hanna, D Letter of Comment dated October 30, 2013 – Redacted version on web only
E-160-5	Hanna, D Letter of Comment dated November 17, 2013 – Redacted version on web only

Exhibit No.	Description
E-160-6	Hanna, D Letter of Comment dated November 22, 2013 – Redacted version on web only
E-161	Hanna, Emily and Terrence Letter of Comment dated October 29, 2013 – Redacted version on web only
E-162	Hofer, E Letter of Comment dated November 16, 2013 – Redacted version on web only
E-163	Hardwick, J Letter of Comment dated October 15, 2013 – Redacted version on web only
E-164	Hargitt, C Letter of Comment dated October 17, 2013 – Redacted version on web only
E-165	Hartmann, S Letter of Comment dated October 17, 2013 – Redacted version on web only
E-166	Hauta, J Letter of Comment dated October 18, 2013 – Redacted version on web only
E-166-1	Hauta, J Letter of Comment dated December 13, 2013 – Redacted version on web only
E-167	Heal, Leo and Loraine Letter of Comment dated October 20, 2013 – Redacted version on web only
E-168	Heal, T Letter of Comment dated October 23, 2013 – Redacted version on web only
E-169	Hendel-Farias, V Letter of Comment dated October 23, 2013 – Redacted version on web only
E-170	Henderson, R Letter of Comment dated October 30, 2013 – Redacted version on web only
E-171	Henson, L Letter of Comment dated October 16, 2013 – Redacted version on web only
E-172	Hilder, T Letter of Comment dated October 17, 2013 – Redacted version on web only
E-173	Hill, D Letter of Comment dated October 2013 – Redacted version on web only
E-173-1	Hill, D Letter of Comment dated October 13, 2013 – Redacted version on web only

Exhibit No.	Description
E-174	Hotz, V Letter of Comment dated November 15, 2013 – Redacted version on web only
E-175	Hockin, J Letter of Comment dated October 24, 2013 – Redacted version on web only
E-176	Hoffmann, Janis and Manfred Letter of Comment dated October 24, 2013 – Redacted version on web only
E-177	Hoffmann, L Letter of Comment dated October 24, 2013 – Redacted version on web only
E-178	Hohmann, Cathy and William Letter of Comment dated October 17, 2013 – Redacted version on web only
E-179	Holm, D Letter of Comment dated November 4, 2013 – Redacted version on web only
E-180	Horne, A Letter of Comment dated October 26, 2013 – Redacted version on web only
E-180-1	Horne, A Letter of Comment dated November 28, 2013 – Redacted version on web only
E-181	Horvath, Marie and David Letter of Comment dated October 17, 2013 – Redacted version on web only
E-182	Hough, A Letter of Comment dated October 21, 2013 – Redacted version on web only
E-183	Hulan, Cindy and Sonja Letter of Comment dated October 27, 2013 – Redacted version on web only
E-184	Hutchinson, A Letter of Comment dated October 10, 2013 – Redacted version on web only
E-185	Illerburn, B Letter of Comment dated October 21, 2013 – Redacted version on web only
E-186	Inselberg, Alex and Diana Letter of Comment dated October 22, 2013 – Redacted version on web only
E-187	Jardine, I Letter of Comment dated October 16, 2013 – Redacted version on web only

Exhibit No.	Description
E-188	Jindrich, J, and Jares, M Letter of Comment dated October 19, 2013 – Redacted version on web only
E-189	Jarrett, L Letter of Comment dated October 23, 2013 – Redacted version on web only
E-190	Johnston, R Letter of Comment dated October 31, 2013 – Redacted version on web only
E-191	Jensen, A Letter of Comment dated October 23, 2013 – Redacted version on web only
E-191-1	Jensen, A Letter of Comment dated November 23, 2013 – Redacted version on web only
E-192	Johansen, S Letter of Comment dated October 22, 2013 – Redacted version on web only
E-193	Johnson, M Letter of Comment dated October 24, 2013 – Redacted version on web only
E-194	Johnson, N Letter of Comment dated October 28, 2013 – Redacted version on web only
E-194-1	Johnson, N Letter of Comment dated November 6, 2013 – Redacted version on web only
E-194-2	Johnson, N Letter of Comment dated November 16, 2013 – Redacted version on web only
E-194-3	Johnson, N Letter of Comment dated December 4, 2013 – Redacted version on web only
E-195	Johnston, D Letter of Comment dated October 21, 2013 – Redacted version on web only
E-195-1	Johnston, D Letter of Comment dated October 29, 2013 – Redacted version on web only
E-196	Kudrick, Suzanne and Brent Letter of Comment dated November 17, 2013 – Redacted version on web only
E-197	Jones, A Letter of Comment dated October 2013 – Redacted version on web only

Exhibit No.	Description
E-198	Jonsson, A Letter of Comment dated October 24, 2013 – Redacted version on web only
E-199	Joyce, A Letter of Comment dated October 17, 2013 – Redacted version on web only
E-200	Furst, CH, and Cutler, WJ Letter of Comment dated October 31, 2013 – Redacted version on web only
E-201	Kearns, S Letter of Comment dated October 23, 2013 – Redacted version on web only
E-202	Smith, K Letter of Comment dated October 20, 2013 – Redacted version on web only
E-203	Kisselev, A Letter of Comment dated November 2, 2013 – Redacted version on web only
E-204	Klein, Joe and Jessica Letter of Comment dated October 22, 2013 – Redacted version on web only
E-205	Klein, G Letter of Comment dated October 24, 2013 – Redacted version on web only
E-206	Kubrak, J Letter of Comment dated November 16, 2013 – Redacted version on web only
E-207	Klindt, M Letter of Comment dated October 18, 2013 – Redacted version on web only
E-207-1	Klindt, M Letter of Comment dated November 17, 2013 – Redacted version on web only
E-208	Kohut, V Letter of Comment dated October 17, 2013 – Redacted version on web only
E-209	Kraayvanger, A Letter of Comment dated October 9, 2013 – Redacted version on web only
E-210	Kratz, K Letter of Comment dated November 2, 2013 – Redacted version on web only
E-211	Kucharsky, W, and Segur, J Letter of Comment dated October 24, 2013 – Redacted version on web only

Exhibit No.	Description
E-212	Kuusisto, E Letter of Comment dated October 24, 2013 – Redacted version on web only
E-213	Laing, R Letter of Comment dated September 15, 2013 – Redacted version on web only
E-214	Lamoureux, R Letter of Comment dated October 14, 2013 – Redacted version on web only
E-215	Lander, F Letter of Comment dated October 24, 2013 – Redacted version on web only
E-215-1	Lander, F Letter of Comment dated November 14, 2013 – Redacted version on web only
E-216	Lane, D Letter of Comment dated October 28, 2013 – Redacted version on web only
E-217	Langegger, M Letter of Comment dated October 22, 2013 – Redacted version on web only
E-218	Langley, W Letter of Comment dated October 11, 2013 – Redacted version on web only
E-219	Latchford, R Letter of Comment dated October 24, 2013 – Redacted version on web only
E-219-1	Latchford, R Letter of Comment dated November 28, 2013 – Redacted version on web only
E-220	Lawrence, J Letter of Comment dated October 23, 2013 – Redacted version on web only
E-221	Lawrence, S Letter of Comment dated October 23, 2013 – Redacted version on web only
E-222	Leja, Karin and Tom Letter of Comment dated November 3, 2013 – Redacted version on web only
E-223	Leslie, C, and Greig, L Letter of Comment dated October 10, 2013 – Redacted version on web only
E-223-1	Leslie, C, and Greig, L Letter of Comment dated November 9, 2013 – Redacted version on web only

Exhibit No.	Description
E-224	Light, K Letter of Comment dated October 26, 2013 – Redacted version on web only
E-225	Lindner, E Letter of Comment dated October 24, 2013 – Redacted version on web only
E-226	Lissau, Julia and John Letter of Comment dated October 17, 2013 – Redacted version on web only
E-227	Little, Alan and Jacqueline Letter of Comment dated October 21, 2013 – Redacted version on web only
E-228	Liu, F Letter of Comment dated October 31, 2013 – Redacted version on web only
E-229	Livant, B Letter of Comment dated October 25, 2013 – Redacted version on web only
E-230	Lorri J Letter of Comment dated October 10, 2013 – Redacted version on web only
E-231	Logan, JA Letter of Comment dated October 17, 2013 – Redacted version on web only
E-232	Lowther, M Letter of Comment dated October 17, 2013 – Redacted version on web only
E-233	Luck, B Letter of Comment dated October 17, 2013 – Redacted version on web only
E-234	Lyons, L Letter of Comment dated November 3, 2013 – Redacted version on web only
E-235	MacDonald Letter of Comment dated October 16, 2013 – Redacted version on web only
E-236	MacKay, J Letter of Comment dated October 17, 2013 – Redacted version on web only
E-237	MacKenzie, C Letter of Comment dated October 17, 2013 – Redacted version on web only
E-238	MacVeagh, P, and Gisler, E Letter of Comment dated October 23, 2013 – Redacted version on web only
E-239	Madsen, C Letter of Comment dated October 18, 2013 – Redacted version on web only

Exhibit No.	Description
E-240	Makaroff, S Letter of Comment dated October 24, 2013 – Redacted version on web only
E-241	Mallett, H Letter of Comment dated October 30, 2013 – Redacted version on web only
E-242	Mannion, A Letter of Comment dated October 9, 2013 – Redacted version on web only
E-242-1	Mannion, A Letter of Comment dated October 21, 2013 – Redacted version on web only
E-242-2	Mannion, A Letter of Comment dated November 17, 2013 – Redacted version on web only
E-242-3	Mannion, A Letter of Comment dated November 23, 2013 – Redacted version on web only
E-242-4	Mannion, A Letter of Comment dated December 16, 2013 – Redacted version on web only
E-243	Mara, K Letter of Comment dated October 18, 2013 – Redacted version on web only
E-244	Marquette, C Letter of Comment dated October 23, 2013 – Redacted version on web only
E-245	Marsden, G Letter of Comment dated October 14, 2013 – Redacted version on web only
E-246	Martin, C Letter of Comment dated October 18, 2013 – Redacted version on web only
E-247	Martin, G Letter of Comment dated October 24, 2013 – Redacted version on web only
E-248	Martin, MA Letter of Comment dated October 10, 2013 – Redacted version on web only
E-248-1	Martin, MA Letter of Comment dated October 14, 2013 – Redacted version on web only
E-248-2	Martin, MA Letter of Comment dated November 11, 2013 – Redacted version on web only

Exhibit No.	Description
E-249	Martin, MJ Letter of Comment dated October 9, 2013 – Redacted version on web only
E-250	Massy, P Letter of Comment dated October 17, 2013 – Redacted version on web only
E-251	Maurenbrecher, P Letter of Comment dated October 24, 2013 – Redacted version on web only
E-252	Maxon, K Letter of Comment dated October 31, 2013 – Redacted version on web only
E-253	McAulay, D Letter of Comment dated October 24, 2013 – Redacted version on web only
E-253-1	McAulay, D Letter of Comment dated November 15, 2013 – Redacted version on web only
E-253-2	McAulay, D Letter of Comment dated December 8, 2013 – Redacted version on web only
E-254	McDonald, S Letter of Comment dated October 17, 2013 – Redacted version on web only
E-255	McFarlane, GL Letter of Comment dated October 27, 2013 – Redacted version on web only
E-256	McIvor, A Letter of Comment dated October 21, 2013 – Redacted version on web only
E-257	McLaren, C Letter of Comment dated October 24, 2013 – Redacted version on web only
E-258	McLeod, G, and Riach, D Letter of Comment dated October 14, 2013 – Redacted version on web only
E-259	McLeod, M Letter of Comment dated October 17, 2013 – Redacted version on web only
E-260	Mcphee, T Letter of Comment dated November 3, 2013 – Redacted version on web only
E-261	Melvina Letter of Comment dated October 17, 2013 – Redacted version on web only

Exhibit No.	Description
E-262	Mense, W Letter of Comment dated October 23, 2013 – Redacted version on web only
E-263	Meszaros, M Letter of Comment dated October 21, 2013 – Redacted version on web only
E-264	Meyer, H Letter of Comment dated October 15, 2013 – Redacted version on web only
E-265	Bowley, M Letter of Comment dated October 17, 2013 – Redacted version on web only
E-266	Mikalian, M Letter of Comment dated October 17, 2013 – Redacted version on web only
E-267	Molloy, AM Letter of Comment dated October 29, 2013 – Redacted version on web only
E-268	Montroy, N, and Filler, C Letter of Comment dated October 21, 2013 – Redacted version on web only
E-269	Moon, T Letter of Comment dated October 24, 2013 – Redacted version on web only
E-270	Morrison, G Letter of Comment dated October 15, 2013 – Redacted version on web only
E-271	Morris, R Letter of Comment dated October 22, 2013 – Redacted version on web only
E-272	Muller, D Letter of Comment dated October 24, 2013 – Redacted version on web only
E-273	Munns, Judith and William Letter of Comment dated October 18, 2013 – Redacted version on web only
E-273-1	Munns, Judith and William Letter of Comment dated November 23, 2013 – Redacted version on web only
E-274	Munro, P Letter of Comment dated October 24, 2013 – Redacted version on web only
E-274-1	Munro, P Letter of Comment dated November 26, 2013 – Redacted version on web only

Exhibit No.	Description
E-275	Neckel, P Letter of Comment dated October 18, 2013 – Redacted version on web only
E-276	Nelissen, R Letter of Comment dated October 10, 2013 – Redacted version on web only
E-277	Neufeld, G Letter of Comment dated October 25, 2013 – Redacted version on web only
E-278	Neuwirth, T Letter of Comment dated October 24, 2013 – Redacted version on web only
E-279	Newton, L Letter of Comment dated October 24, 2013 – Redacted version on web only
E-280	Nienaber, R Letter of Comment dated October 16, 2013 – Redacted version on web only
E-281	Noble, D Letter of Comment dated October 17, 2013 – Redacted version on web only
E-282	Noble, S Letter of Comment dated October 17, 2013 – Redacted version on web only
E-283	Novak, B Letter of Comment dated October 24, 2013 – Redacted version on web only
E-284	Nyberg, R and Leschke, T Letter of Comment dated November 15, 2013 – Redacted version on web only
E-284-1	Nyberg, R and Leschke, T Letter of Comment dated December 16, 2013 – Redacted version on web only
E-284-2	Leschke, T, and Nyberg, R Letter of Comment dated December 19, 2013 – Redacted version on web only
E-285	Novel, Hans and Consuelo Letter of Comment dated October 10, 2013 – Redacted version on web only
E-285-1	Novel, Hans and Consuelo Letter of Comment dated October 15, 2013 – Redacted version on web only
E-285-2	Novel, Hans Letter of Comment dated October 23, 2013 – Redacted version on web only

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Exhibit No.	Description
E-286	O'Brien, Erin and Eileen Letter of Comment dated October 27, 2013 – Redacted version on web only
E-287	O'Connor, J, Reynolds, J, McClean, C, and McClean, J Letter of Comment dated October 24, 2013 – Redacted version on web only
E-288	O'Donnell, FH Letter of Comment dated October 21, 2013 – Redacted version on web only
E-288-1	O'Donnell, F Letter of Comment dated December 15, 2013 –Redacted version on web only
E-289	O'Donnell, S Letter of Comment dated October 20, 2013 – Redacted version on web only
E-289-1	O'Donnell, S Letter of Comment dated October 17, 2013 – Redacted version on web only
E-289-2	O'Donnell, S Letter of Comment dated December 24, 2013 – Redacted version on web only
E-290	Ogg, K Letter of Comment dated October 23, 2013 – Redacted version on web only
E-291	Olson, B Letter of Comment dated October 24, 2013 – Redacted version on web only
E-292	Orcutt, S Letter of Comment dated October 23, 2013 – Redacted version on web only
E-293	Orr, D Letter of Comment dated October 19, 2013 – Redacted version on web only
E-294	Ortega, Angele and Richard Letter of Comment dated October 20, 2013 – Redacted version on web only
E-294-1	Ortega, A Letter of Comment dated November 23, 2013 – Redacted version on web only
E-295	Ostoforoff, R Letter of Comment dated October 24, 2013 – Redacted version on web only
E-296	Ouimet, Suzanne and Ronald Letter of Comment dated October 22, 2013 – Redacted version on web only

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Exhibit No.	Description
E-297	Palmer, L Letter of Comment dated October 23, 2013 – Redacted version on web only
E-298	Panchy, M Letter of Comment dated November 3, 2013 – Redacted version on web only
E-299	Parr, K Letter of Comment dated October 17, 2013 – Redacted version on web only
E-300	Pennie, E Letter of Comment dated October 22, 2013 – Redacted version on web only
E-301	Pereboom, Z Letter of Comment dated October 21, 2013 – Redacted version on web only
E-301-1	Pereboom, Z Letter of Comment dated October 22, 2013 – Redacted version on web only
E-302	Perry, J Letter of Comment dated October 16, 2013 – Redacted version on web only
E-303	Petch, J Letter of Comment dated October 17, 2013 – Redacted version on web only
E-303-1	Petch, Lyle and Jane Letter of Comment dated October 17, 2013 – Redacted version on web only
E-304	Zulich, I Letter of Comment dated October 19, 2013 – Redacted version on web only
E-305	Petersen, S Letter of Comment dated October 17, 2013 – Redacted version on web only
E-306	Peters, MM Letter of Comment dated October 22, 2013 – Redacted version on web only
E-307	Peterson, H Letter of Comment dated October 22, 2013 – Redacted version on web only
E-308	Phillips, R Letter of Comment dated November 6, 2013 – Redacted version on web only
E-308-1	Phillips, R Letter of Comment dated October 29, 2013 – Redacted version on web only

Exhibit No.	Description
E-309	Pickett, T Letter of Comment dated October 24, 2013 – Redacted version on web only
E-310	Poirier, K Letter of Comment dated October 24, 2013 – Redacted version on web only
E-311	Pongratz-Doyle, J Letter of Comment dated October 17, 2013 – Redacted version on web only
E-311-1	Pongratz-Doyle, J Letter of Comment dated September 21, 2013 – Redacted version on web only
E-312	Porcher, S Letter of Comment dated October 17, 2013 – Redacted version on web only
E-313	Price, A Letter of Comment dated October 23, 2013 – Redacted version on web only
E-314	Priebe, B Letter of Comment dated October 9, 2013 – Redacted version on web only
E-315	Proctor, Georgia Taylor and Gillean Letter of Comment dated October 24, 2013 – Redacted version on web only
E-316	Raftery, S Letter of Comment dated October 22, 2013 – Redacted version on web only
E-317	Rainwalker, E Letter of Comment dated October 24, 2013 – Redacted version on web only
E-318	Ramcharran, V Letter of Comment dated October 17, 2013 – Redacted version on web only
E-319	Randall, D Letter of Comment dated November 3, 2013 – Redacted version on web only
E-320	Rautenbach, F Letter of Comment dated October 25, 2013 – Redacted version on web only
E-320-1	Rautenbach, F Letter of Comment dated November 29, 2013 – Redacted version on web only
E-320-2	Rautenbach, F Letter of Comment dated November 29, 2013 – Redacted version on web only

Exhibit No.	Description
E-320-3	Rautenbach, F Letter of Comment dated November 29, 2013 – Redacted version on web only
E-320-4	Rautenbach, F Letter of Comment dated December 18, 2013 – Redacted version on web only
E-320-5	Rautenbach, F Letter of Comment dated December 18, 2013 – Redacted version on web only
E-321	Read, D Letter of Comment dated October 23, 2013 – Redacted version on web only
E-321-1	Read, D Letter of Comment dated November 18, 2013 – Redacted version on web only
E-321-2	Read, D Letter of Comment dated December 19, 2013 – Redacted version on web only
E-322	Read, K Letter of Comment dated October 24, 2013 – Redacted version on web only
E-322-1	Read, K Letter of Comment dated October 22, 2013 – Redacted version on web only
E-323	Redekopp, W Letter of Comment dated October 25, 2013 – Redacted version on web only
E-324	Regeling, A Letter of Comment dated October 20, 2013 – Redacted version on web only
E-325	Reid, Bonnie and Gordon Letter of Comment dated October 24, 2013 – Redacted version on web only
E-326	Renshaw, D Letter of Comment dated October 21, 2013 – Redacted version on web only
E-327	Retzlaff, R Letter of Comment dated October 21, 2013 – Redacted version on web only
E-328	Reyda, S Letter of Comment dated November 3, 2013 – Redacted version on web only
E-329	Reynolds, Norman and Nancy Letter of Comment dated October 19, 2013 – Redacted version on web only

Exhibit No.	Description
E-330	Richardson, I Letter of Comment dated October 23, 2013 – Redacted version on web only
E-331	Richardson, K Letter of Comment dated October 24, 2013 – Redacted version on web only
E-331-1	Richardson, K Letter of Comment dated November 1, 2013 – Redacted version on web only
E-332	Richmond, A Letter of Comment dated October 21, 2013 – Redacted version on web only
E-333	Rilkoff, E Letter of Comment dated October 24, 2013 – Redacted version on web only
E-334	Ritchie, J Letter of Comment dated October 23, 2013 – Redacted version on web only
E-335	Roenitz, Dagmar and Horst Letter of Comment dated November 16, 2013 – Redacted version on web only
E-336	Robbins, B Letter of Comment dated October 24, 2013 – Redacted version on web only
E-337	Robinson, B Letter of Comment dated October 24, 2013 – Redacted version on web only
E-338	Rolin, Ken and Dorothy Letter of Comment dated October 21, 2013 – Redacted version on web only
E-339	Romanik, Muryl and Brian Letter of Comment dated October 10, 2013 – Redacted version on web only
E-339-1	Romanik, Muryl and Brian Letter of Comment dated November 21, 2013 – Redacted version on web only
E-340	Ronczewski, G, and Kozicka, M Letter of Comment dated October 22, 2013 – Redacted version on web only
E-341	Ross, G Letter of Comment dated October 23, 2013 – Redacted version on web only
E-342	Rubel, W Letter of Comment dated October 17, 2013 – Redacted version on web only

Exhibit No.	Description
E-343	Rubin, E Letter of Comment dated October 21, 2013 – Redacted version on web only
E-344	Rueger, D Letter of Comment dated October 23, 2013 – Redacted version on web only
E-345	Ruemke, G Letter of Comment dated October 11, 2013 – Redacted version on web only
E-346	Rueschmann, P Letter of Comment dated October 18, 2013 – Redacted version on web only
E-347	Rumsey, B Letter of Comment dated October 18, 2013 – Redacted version on web only
E-348	Runciman, J Letter of Comment dated October 22, 2013 – Redacted version on web only
E-349	Ryan-Lewis, R, and West, A Letter of Comment dated October 24, 2013 – Redacted version on web only
E-350	Saarinen, L Letter of Comment dated October 24, 2013 – Redacted version on web only
E-351	Saigo, D Letter of Comment dated October 24, 2013 – Redacted version on web only
E-352	Salter, L Letter of Comment dated October 11, 2013 – Redacted version on web only
E-353	Sansome, E Letter of Comment dated October 17, 2013 – Redacted version on web only
E-354	Savoy, Shirley and Fred Letter of Comment dated October 24, 2013 – Redacted version on web only
E-355	Sawyer, L Letter of Comment dated October 24, 2013 – Redacted version on web only
E-356	Sayers, C Letter of Comment dated October 24, 2013 – Redacted version on web only
E-357	Scarf, C Letter of Comment dated October 21, 2013 – Redacted version on web only

Exhibit No.	Description
E-358	Schepens, T Letter of Comment dated October 24, 2013 – Redacted version on web only
E-359	Schiek, G, and Chu, M Letter of Comment dated October 14, 2013 – Redacted version on web only
E-360	Schimunek, J Letter of Comment dated October 17, 2013 – Redacted version on web only
E-361	Schluschen, Marcus and Benita Letter of Comment dated October 24, 2013 – Redacted version on web only
E-362	Schneider, T Letter of Comment dated October 20, 2013 – Redacted version on web only
E-363	Schneider, W Letter of Comment dated October 17, 2013 – Redacted version on web only
E-364	Schnurr, S Letter of Comment dated October 12, 2013 – Redacted version on web only
E-364-1	Schnurr, S Letter of Comment dated November 22, 2013 – Redacted version on web only
E-364-2	Schnurr, S Letter of Comment dated December 12, 2013 – Redacted version on web only
E-365	Schram, B Letter of Comment dated October 21, 2013 – Redacted version on web only
E-366	Schuster, M Letter of Comment dated October 10, 2013 – Redacted version on web only
E-366-1	Schuster, M Letter of Comment dated October 28, 2013 – Redacted version on web only
E-367	Schwabe, E Letter of Comment dated October 24, 2013 – Redacted version on web only
E-368	Scott, BA Letter of Comment dated October 23, 2013 – Redacted version on web only
E-369	Scott, R Letter of Comment dated October 18, 2013 – Redacted version on web only

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Exhibit No.	Description
E-370	Scott, S Letter of Comment dated October 17, 2013 – Redacted version on web only
E-371	Seguin, Roland and Lorraine Letter of Comment dated October 10, 2013 – Redacted version on web only
E-372	Shandler, J Letter of Comment dated November 4, 2013 – Redacted version on web only
E-373	Shand, M Letter of Comment dated November 3, 2013 – Redacted version on web only
E-374	Sheikh, M Letter of Comment dated October 17, 2013 – Redacted version on web only
E-374-1	Sheikh, M Letter of Comment dated October 23, 2013 – Redacted version on web only
E-374-2	Sheikh, M Letter of Comment dated November 26, 2013 – Redacted version on web only
E-374-3	Sheikh, M Letter of Comment dated December 18, 2013 – Redacted version on web only
E-375	Shibley, D Letter of Comment dated October 21, 2013 – Redacted version on web only
E-375-1	Shibley, D Letter of Comment dated November 7, 2013 – Redacted version on web only
E-376	Shular, W Letter of Comment dated October 23, 2013 – Redacted version on web only
E-377	Simmons, K Letter of Comment dated October 24, 2013 – Redacted version on web only
E-378	Simper, R Letter of Comment dated October 21, 2013 – Redacted version on web only
E-378-1	Simper, R Letter of Comment dated October 24, 2013 – Redacted version on web only
E-379	Singh, J Letter of Comment dated October 21, 2013 – Redacted version on web only

Exhibit No.	Description
E-379-1	Singh, J Letter of Comment dated November 16, 2013 – Redacted version on web only
E-379-2	Singh, J Letter of Comment dated December 18, 2013 – Redacted version on web only
E-380	Smith, K Letter of Comment dated October 31, 2013 – Redacted version on web only
E-381	Smith, M Letter of Comment dated October 30, 2013 – Redacted version on web only
E-381-1	Smith, M Letter of Comment dated November 10, 2013 – Redacted version on web only
E-382	Snow, S Letter of Comment dated October 25, 2013 – Redacted version on web only
E-383	Sopow, B Letter of Comment dated October 22, 2013 – Redacted version on web only
E-384	Standeven, B Letter of Comment dated October 24, 2013 – Redacted version on web only
E-385	Stewart, M Letter of Comment dated October 22, 2013 – Redacted version on web only
E-386	Stewart, T Letter of Comment dated October 17, 2013 – Redacted version on web only
E-387	Stone, P Letter of Comment dated October 29, 2013 – Redacted version on web only
E-388	Storey, EA Letter of Comment dated October 21, 2013 – Redacted version on web only
E-389	Street, Robert and Judy Letter of Comment dated October 2013 – Redacted version on web only
E-389-1	Street, Robert and Judy Letter of Comment dated December 17, 2013 – Redacted version on web only
E-390	Stuart, G Letter of Comment dated October 22, 2013 – Redacted version on web only

Exhibit No.	Description
E-390-1	Stuart, G Letter of Comment dated November 26, 2013 – Redacted version on web only
E-391	Stump, G Letter of Comment dated October 24, 2013 – Redacted version on web only
E-392	Sudlow, Ray and Paula Letter of Comment dated October 26, 2013 – Redacted version on web only
E-392-1	Sudlow, Ray and Paula Letter of Comment dated November 16, 2013 – Redacted version on web only
E-393	Talbot, L Letter of Comment dated October 27, 2013 – Redacted version on web only
E-394	Tara, S Letter of Comment dated October 21, 2013 – Redacted version on web only
E-395	Tasi, M Letter of Comment dated October 24, 2013 – Redacted version on web only
E-395-1	Tasi, M Letter of Comment dated November 17, 2013 – Redacted version on web only
E-396	Taylor, R Letter of Comment dated October 24, 2013 – Redacted version on web only
E-397	Thibedeau, T Letter of Comment dated October 29, 2013 – Redacted version on web only
E-398	Thompson, AP Letter of Comment dated October 23, 2013 – Redacted version on web only
E-399	Tobin, S Letter of Comment dated October 22, 2013 – Redacted version on web only
E-400	Todd, S, and Hulan, C Letter of Comment dated October 23, 2013 – Redacted version on web only
E-401	Tolton, L Letter of Comment dated October 23, 2013 – Redacted version on web only
E-402	Toop, Gail and Gerald Letter of Comment dated October 22, 2013 – Redacted version on web only
E-403	Troc, L Letter of Comment dated October 31, 2013 – Redacted version on web only

Exhibit No.	Description
E-404	Tucker, J Letter of Comment dated October 27, 2013 – Redacted version on web only
E-405	Tucker, R Letter of Comment dated October 27, 2013 – Redacted version on web only
E-406	Tulak, M Letter of Comment dated October 22, 2013 – Redacted version on web only
E-407	Tyson, H Letter of Comment dated October 20, 2013 – Redacted version on web only
E-408	Unger, M Letter of Comment dated October 24, 2013 – Redacted version on web only
E-409	van Heteren, J Letter of Comment dated October 20, 2013 – Redacted version on web only
E-410	van Lidth de Jeude, E Letter of Comment dated October 17, 2013 – Redacted version on web only
E-411	Verduyn, P Letter of Comment dated October 17, 2013 – Redacted version on web only
E-412	Vermes, C Letter of Comment dated October 18, 2013 – Redacted version on web only
E-413	Voisin, S, and Gerland, G Letter of Comment dated October 24, 2013 – Redacted version on web only
E-414	Vondra, M Letter of Comment dated October 15, 2013 – Redacted version on web only
E-415	Vondruska, F Letter of Comment dated October 10, 2013 – Redacted version on web only
E-415-1	Vondruska, F Letter of Comment dated October 17, 2013 – Redacted version on web only
E-415-2	Vondruska, F Letter of Comment dated December 4, 2013 – Redacted version on web only
E-416	Walker, L Letter of Comment dated October 16, 2013 – Redacted version on web only

Exhibit No.	Description
E-416-1	Walker, L Letter of Comment dated October 23, 2013 – Redacted version on web only
E-417	Wallace, J Letter of Comment dated October 21, 2013 – Redacted version on web only
E-417-1	Wallace, J Letter of Comment dated October 21, 2013 – Redacted version on web only
E-418	Ward, W Letter of Comment dated October 29, 2013 – Redacted version on web only
E-419	Warren, D Letter of Comment dated October 24, 2013 – Redacted version on web only
E-420	Watson, Grant and Cammie Letter of Comment dated October 26, 2013 – Redacted version on web only
E-421	Watts, K Letter of Comment dated October 10, 2013 – Redacted version on web only
E-421-1	Watts, K Letter of Comment dated October 17, 2013 – Redacted version on web only
E-422	Weaver, F Letter of Comment dated October 23, 2013 – Redacted version on web only
E-423	Weiss, K Letter of Comment dated October 24, 2013 – Redacted version on web only
E-424	Westby, L Letter of Comment dated October 21, 2013 – Redacted version on web only
E-425	Whitburn, D Letter of Comment dated October 24, 2013 – Redacted version on web only
E-426	Whiteduck, M Letter of Comment dated October 11, 2013 – Redacted version on web only
E-426-1	Whiteduck, M Letter of Comment dated October 25, 2013 – Redacted version on web only
E-426-2	Whiteduck, M Letter of Comment dated November 13, 2013 – Redacted version on web only

Exhibit No.	Description
E-426-3	Whiteduck, M Letter of Comment dated November 14, 2013 – Redacted version on web only
E-426-4	Whiteduck, M Letter of Comment dated November 17, 2013 – Redacted version on web only
E-427	White, E Letter of Comment dated October 22, 2013 – Redacted version on web only
E-427-1	White, E Letter of Comment dated October 24, 2013 – Redacted version on web only
E-428	Whitehead, J Letter of Comment dated October 20, 2013 – Redacted version on web only
E-429	Whitworth, J Letter of Comment dated October 31, 2013 – Redacted version on web only
E-430	Wickland, Grant and Wendy Letter of Comment dated October 17, 2013 – Redacted version on web only
E-430-1	Wickland, Wendy and Grant Letter of Comment dated November 26, 2013 – Redacted version on web only
E-431	Wierzbicki, D Letter of Comment dated October 17, 2013 – Redacted version on web only
E-432	Wieser, P Letter of Comment dated October 24, 2013 – Redacted version on web only
E-433	Wilcox, T Letter of Comment dated October 19, 2013 – Redacted version on web only
E-433-1	Wilcox, T Letter of Comment dated October 23, 2013 – Redacted version on web only
E-433-2	Wilcox, T Letter of Comment dated November 11, 2013 – Redacted version on web only
E-433-3	Wilcox, T Letter of Comment dated December 16, 2013 – Redacted version on web only
E-434	Wilhelm, G Letter of Comment dated October 24, 2013 – Redacted version on web only

Exhibit No.	Description
E-435	Wilkinson, H Letter of Comment dated October 28, 2013 – Redacted version on web only
E-436	Wilson, D Letter of Comment dated October 23, 2013 – Redacted version on web only
E-437	Wilson, S Letter of Comment dated October 24, 2013 – Redacted version on web only
E-438	Winkler, D Letter of Comment dated October 18, 2013 – Redacted version on web only
E-439	Witzer, D Letter of Comment dated November 2, 2013 – Redacted version on web only
E-440	Wolansky, S Letter of Comment dated October 21, 2013 – Redacted version on web only
E-441	Wong, G Letter of Comment dated October 24, 2013 – Redacted version on web only
E-442	Wood, G Letter of Comment dated October 22, 2013 – Redacted version on web only
E-443	Wood, L Letter of Comment dated October 24, 2013 – Redacted version on web only
E-444	Wrigley, B and Green, K Letter of Comment dated October 23, 2013 – Redacted version on web only
E-445	Wyche, B Letter of Comment dated October 14, 2013 – Redacted version on web only
E-446	Wyndlow, G Letter of Comment dated October 21, 2013 – Redacted version on web only
E-447	Wyndlow, K Letter of Comment dated October 21, 2013 – Redacted version on web only
E-448	Yeend, S, and Rauch, R Letter of Comment dated October 14, 2013 – Redacted version on web only
E-449	Young, B Letter of Comment dated October 17, 2013 – Redacted version on web only

Exhibit No.	Description
E-450	Young, Val and Herb Letter of Comment dated October 11, 2013 – Redacted version on web only
E-451	Zeviar, Z Letter of Comment dated October 24, 2013 – Redacted version on web only
E-452	Zsadanyi, M Letter of Comment dated October 20, 2013 – Redacted version on web only
E-453	Blenner-Hassett, B Letter of Comment dated November 6, 2013 – Redacted version on web only
E-454	Bolten, P Letter of Comment dated November 6, 2013 – Redacted version on web only
E-454-1	Bolten, P Letter of Comment dated November 13, 2013 – Redacted version on web only
E-455	Meerman, C, and Pasemko, D Letter of Comment dated November 6, 2013 – Redacted version on web only
E-456	Oster, Daniel and Donna Letter of Comment dated November 5, 2013 – Redacted version on web only
E-457	Parnham, B Letter of Comment dated September 17, 2013 – Redacted version on web only
E-458	Simoes, K Letter of Comment dated November 5, 2013 – Redacted version on web only
E-459	Vaughan, H Letter of Comment dated November 5, 2013 – Redacted version on web only
E-460	Baily, K Letter of Comment dated November 10, 2013 – Redacted version on web only
E-461	Baril, S Letter of Comment dated November 7, 2013 – Redacted version on web only
E-462	Bayudang, R Letter of Comment dated November 9, 2013 – Redacted version on web only
E-462-1	Bayudang, R Letter of Comment dated November 16, 2013 – Redacted version on web only

Exhibit No.	Description
E-463	Beckerman, Alan and Freda Letter of Comment dated November 10, 2013 – Redacted version on web only
E-464	Bertram, V Letter of Comment dated November 12, 2013 – Redacted version on web only
E-465	Bill, E Letter of Comment dated November 11, 2013 – Redacted version on web only
E-465-1	Bill, E Letter of Comment dated November 12, 2013 – Redacted version on web only
E-465-2	Bill, E Letter of Comment dated November 20, 2013 – Redacted version on web only
E-466	Blakesley, M Letter of Comment dated September 17, 2013 – Redacted version on web only
E-467	Boake, E Letter of Comment dated November 7, 2013 – Redacted version on web only
E-468	Caputo, AM Letter of Comment dated November 8, 2013 – Redacted version on web only
E-469	Cernat, C Letter of Comment dated November 12, 2013 – Redacted version on web only
E-470	Cluff, J Letter of Comment dated November 10, 2013 – Redacted version on web only
E-471	Cranston, D Letter of Comment dated November 11, 2013 – Redacted version on web only
E-472	Delville, B Letter of Comment dated November 10, 2013 – Redacted version on web only
E-473	Delville, M Letter of Comment dated November 10, 2013 – Redacted version on web only
E-474	Duch, D Letter of Comment dated November 9, 2013 – Redacted version on web only
E-475	Ervin, J Letter of Comment dated November 12, 2013 – Redacted version on web only

Exhibit No.	Description
E-476	Eyles, C Letter of Comment dated November 11, 2013 – Redacted version on web only
E-477	Falch-Nielsen, B Letter of Comment dated November 7, 2013 – Redacted version on web only
E-478	Farnsworth, RA Letter of Comment dated November 12, 2013 – Redacted version on web only
E-479	Fraser, S Letter of Comment dated November 11, 2013 – Redacted version on web only
E-480	Gledhill, L, and Morris, G Letter of Comment dated November 8, 2013 – Redacted version on web only
E-481	Gordon, K Letter of Comment dated November 7, 2013 – Redacted version on web only
E-482	Gould, N Letter of Comment dated November 12, 2013 – Redacted version on web only
E-482-1	Gould, N Letter of Comment dated November 12, 2013 – Redacted version on web only
E-482-2	Gould, N Letter of Comment dated November 12, 2013 – Redacted version on web only
E-483	Gurm, A Letter of Comment dated November 11, 2013 – Redacted version on web only
E-484	Hackett, R Letter of Comment dated November 12, 2013 – Redacted version on web only
E-485	Hafeez, J Letter of Comment dated November 7, 2013 – Redacted version on web only
E-485-1	Hafeez, J Letter of Comment dated November 29, 2013 – Redacted version on web only
E-486	Hannas, L Letter of Comment dated November 11, 2013 – Redacted version on web only
E-487	Hansen, E Letter of Comment dated November 12, 2013 – Redacted version on web only

Exhibit No.	Description
E-488	Hewison, M Letter of Comment dated November 10, 2013 – Redacted version on web only
E-489	Higgins, B Letter of Comment dated November 4, 2013 – Redacted version on web only
E-490	Humphries, JM Letter of Comment dated November 8, 2013 – Redacted version on web only
E-491	Kemp, V Letter of Comment dated November 4, 2013 – Redacted version on web only
E-492	Lamb, P, and Gelwicks, J Letter of Comment dated November 11, 2013 – Redacted version on web only
E-492-1	Lamb, P Letter of Comment dated January 14, 2014 – Redacted version on web only
E-493	Latta, Elizabeth and Doug Letter of Comment dated November 11, 2013 – Redacted version on web only
E-494	Radley, TL Letter of Comment dated November 8, 2013 – Redacted version on web only
E-495	Luke, T Letter of Comment dated November 11, 2013 – Redacted version on web only
E-496	Perchaluk, D Letter of Comment dated November 11, 2013 – Redacted version on web only
E-497	McColeman, W, and Price, C Letter of Comment dated November 12, 2013 – Redacted version on web only
E-498	Martin, F, and Michell, H Letter of Comment dated November 4, 2013 – Redacted version on web only
E-499	Miller, L Letter of Comment dated November 12, 2013 – Redacted version on web only
E-500	Murray, C Letter of Comment dated November 12, 2013 – Redacted version on web only
E-501	Nuse, E, and Sanderson, G Letter of Comment dated November 12, 2013 – Redacted version on web only

Exhibit No.	Description
E-502	Olynek, B Letter of Comment dated November 9, 2013 – Redacted version on web only
E-502-1	Olynek, B Letter of Comment dated November 12, 2013 – Redacted version on web only
E-502-2	Olynek, B Letter of Comment dated November 23, 2013 – Redacted version on web only
E-502-3	Olynek, B Letter of Comment dated November 24, 2013 – Redacted version on web only
E-502-4	Olynek, B Letter of Comment dated November 25, 2013 – Redacted version on web only
E-502-5	Olynek, B Letter of Comment dated December 15, 2013 – Redacted version on web only
E-502-6	Olynek, B Letter of Comment dated December 18, 2013 – Redacted version on web only
E-503	Perchaluk, D Letter of Comment dated November 11, 2013 – Redacted version on web only
E-504	Poirier, R Letter of Comment dated November 12, 2013 – Redacted version on web only
E-505	Quickfall, Tim and Lucia Letter of Comment dated November 8, 2013 – Redacted version on web only
E-506	Randall, D Letter of Comment dated November 3, 2013 – Redacted version on web only
E-507	Regina Letter of Comment dated November 9, 2013 – Redacted version on web only
E-508	Ryan Letter of Comment dated November 10, 2013 – Redacted version on web only
E-509	Sanders, G Letter of Comment dated November 12, 2013 – Redacted version on web only
E-510	Sandler, H Letter of Comment dated November 1, 2013 – Redacted version on web only

Exhibit No.	Description
E-511	Saunders, K Letter of Comment dated November 11, 2013 – Redacted version on web only
E-512	Scheepens, E Letter of Comment dated November 12, 2013 – Redacted version on web only
E-513	Schiller, S Letter of Comment dated November 10, 2013 – Redacted version on web only
E-514	Schneider, Claudia and Uwe Letter of Comment dated November 9, 2013 – Redacted version on web only
E-515	Searle, A Letter of Comment dated November 12, 2013 – Redacted version on web only
E-516	Shapperd, P Letter of Comment dated November 11, 2013 – Redacted version on web only
E-517	Shepherd, S Letter of Comment dated November 11, 2013 – Redacted version on web only
E-518	Sinclair, B, and Weinmann, H Letter of Comment dated November 10, 2013 – Redacted version on web only
E-519	Smith, S Letter of Comment dated November 3, 2013 – Redacted version on web only
E-520	Stockbrugger, K, and Cole, J Letter of Comment dated November 11, 2013 – Redacted version on web only
E-521	Todoruk, T Letter of Comment dated November 12, 2013 – Redacted version on web only
E-522	Vinzee Letter of Comment dated November 11, 2013 – Redacted version on web only
E-523	Wallace, B Letter of Comment dated November 10, 2013 – Redacted version on web only
E-524	Warrington, G Letter of Comment dated October 27, 2013 – Redacted version on web only
E-525	Weber, L Letter of Comment dated November 7, 2013 – Redacted version on web only

Exhibit No.	Description
E-526	Wilson-Storey, J Letter of Comment dated November 7, 2013 – Redacted version on web only
E-527	Witzer, D Letter of Comment dated November 2, 2013 – Redacted version on web only
E-528	Woolston, A Letter of Comment dated November 11, 2013 – Redacted version on web only
E-529	Wrench, D Letter of Comment dated November 10, 2013 – Redacted version on web only
E-530	Jantzen, R Letter of Comment dated October 31, 2013 – Redacted version on web only
E-531	Johnston, R Letter of Comment dated November 2, 2013 – Redacted version on web only
E-532	Winfrey, F Letter of Comment dated October 30, 2013 – Redacted version on web only
E-533	Aarons, C Letter of Comment dated November 13, 2013 – Redacted version on web only
E-534	Andrew, T Letter of Comment dated November 13, 2013 – Redacted version on web only
E-535	Birkett, T Letter of Comment dated November 13, 2013 – Redacted version on web only
E-536	Bowns, A Letter of Comment dated November 13, 2013 – Redacted version on web only
E-537	Brittain, J Letter of Comment dated November 13, 2013 – Redacted version on web only
E-538	Buell, B Letter of Comment dated November 13, 2013 – Redacted version on web only
E-539	Davis, Mike and Teresa Letter of Comment dated November 13, 2013 – Redacted version on web only
E-540	Lawson, Lori and Russ Letter of Comment dated November 13, 2013 – Redacted version on web only

Exhibit No.	Description
E-541	Leiren, B Letter of Comment dated November 13, 2013 – Redacted version on web only
E-542	Removed - Letter of Comment dated November 13, 2013
E-543	Michaelis, S Letter of Comment dated November 13, 2013 – Redacted version on web only
E-544	Milne, O Letter of Comment dated November 13, 2013 – Redacted version on web only
E-545	Moore, M Letter of Comment dated November 13, 2013 – Redacted version on web only
E-546	Peynenburg, M, and Krichbaum, V Letter of Comment dated November 13, 2013 – Redacted version on web only
E-547	Posten, L Letter of Comment dated November 13, 2013 – Redacted version on web only
E-548	Raymond, C Letter of Comment dated November 13, 2013 – Redacted version on web only
E-549	Reimer, C Letter of Comment dated November 13, 2013 – Redacted version on web only
E-550	Savasta, D, and Lacterman, A Letter of Comment dated November 13, 2013 – Redacted version on web only
E-551	Shoquist, G Letter of Comment dated November 13, 2013 – Redacted version on web only
E-552	Skulmoski, LK Letter of Comment dated November 13, 2013 – Redacted version on web only
E-553	Thomson, K Letter of Comment dated November 13, 2013 – Redacted version on web only
E-553-1	Thomson, K Letter of Comment dated November 2013 – Redacted version on web only
E-554	Tweedle, JW, and Smyth, L Letter of Comment dated November 13, 2013 – Redacted version on web only

Exhibit No.	Description
E-555	Waechter, Alvin and Therese Letter of Comment dated November 13, 2013 – Redacted version on web only
E-556	White, S Letter of Comment dated November 13, 2013 – Redacted version on web only
E-557	Woolverton, B Letter of Comment dated November 13, 2013 – Redacted version on web only
E-558	Giesbrecht, H Letter of Comment dated November 12, 2013 – Redacted version on web only
E-559	McCombs, D Letter of Comment dated November 13, 2013 – Redacted version on web only
E-560	Campbell, B Letter of Comment dated November 14, 2013 – Redacted version on web only
E-561	Diener, M Letter of Comment dated November 9, 2013 – Redacted version on web only
E-562	Farell, S Letter of Comment dated November 14, 2013 – Redacted version on web only
E-563	Finnegan, S Letter of Comment dated November 14, 2013 – Redacted version on web only
E-564	Harper, NJ Letter of Comment dated November 14, 2013 – Redacted version on web only
E-565	Holm, H Letter of Comment dated November 14, 2013 – Redacted version on web only
E-565-1	Holm, H Letter of Comment dated December 13, 2013 – Redacted version on web only
E-566	Jackson, N Letter of Comment dated November 14, 2013 – Redacted version on web only
E-567	Liedl, R Letter of Comment dated November 14, 2013 – Redacted version on web only
E-568	Moniz, E Letter of Comment dated November 14, 2013 – Redacted version on web only

Exhibit No.	Description
E-569	Ridgway, Pat and Ian Letter of Comment dated November 14, 2013 – Redacted version on web only
E-570	Schmieg, M Letter of Comment dated November 14, 2013 – Redacted version on web only
E-571	Scott, Robert and Jacqueline Letter of Comment dated November 14, 2013 – Redacted version on web only
E-572	Stein, J Letter of Comment dated November 13, 2013 – Redacted version on web only
E-573	Woodhall, C Letter of Comment dated November 14, 2013 – Redacted version on web only
E-574	Marion, G Letter of Comment dated November 10, 2013 – Redacted version on web only
E-574-1	Marion, G Letter of Comment dated November 17, 2013 – Redacted version on web only
E-574-2	Marion, G Letter of Comment dated December 15, 2013 – Redacted version on web only
E-575	McKenzie, WC Letter of Comment dated November 9, 2013 – Redacted version on web only
E-575-1	McKenzie, WC Letter of Comment dated November 13, 2013 – Redacted version on web only
E-576	Kravensky, D Letter of Comment dated November 11, 2013 – Redacted version on web only
E-577	Meier, H Letter of Comment dated October 31, 2013 – Redacted version on web only
E-578	Addison, M Letter of Comment dated November 20, 2013 – Redacted version on web only
E-579	Allan, J Letter of Comment dated November 17, 2013 – Redacted version on web only
E-580	Armstrong, S Letter of Comment dated November 15, 2013 – Redacted version on web only

Exhibit No.	Description
E-581	Baljak, D Letter of Comment dated November 16, 2013 – Redacted version on web only
E-582	Baron, C Letter of Comment dated November 15, 2013 – Redacted version on web only
E-583	Barringer, G Letter of Comment dated November 17, 2013 – Redacted version on web only
E-584	Bartel, T Letter of Comment dated November 18, 2013 – Redacted version on web only
E-585	Beaman, C Letter of Comment dated November 17, 2013 – Redacted version on web only
E-585-1	Beaman, C Letter of Comment dated November 24, 2013 – Redacted version on web only
E-586	Halfnights, A Letter of Comment dated November 25, 2013 – Redacted version on web only
E-586-1	Halfnights, A Letter of Comment dated November 25, 2013 – Redacted version on web only
E-587	Hardy, S Letter of Comment dated November 22, 2013 – Redacted version on web only
E-587-1	Hardy, S Letter of Comment dated December 17, 2013 – Redacted version on web only
E-588	Bell, JM Letter of Comment dated November 16, 2013 – Redacted version on web only
E-589	Bell, Y Letter of Comment dated November 16, 2013 – Redacted version on web only
E-589-1	Bell, Y Letter of Comment dated December 21, 2013 – Redacted version on web only
E-590	Bernhardt, B Letter of Comment dated November 25, 2013 – Redacted version on web only
E-591	Bickford, E Letter of Comment dated November 26, 2013 – Redacted version on web only

Exhibit No.	Description
E-592	Bockus, S Letter of Comment dated November 18, 2013 – Redacted version on web only
E-593	Bouvette, Z Letter of Comment dated November 24, 2013 – Redacted version on web only
E-594	Brahams, S Letter of Comment dated November 18, 2013 – Redacted version on web only
E-595	Bruiger, D Letter of Comment dated November 25, 2013 – Redacted version on web only
E-596	Carlson, A Letter of Comment dated November 16, 2013 – Redacted version on web only
E-597	Chadwick, C Letter of Comment dated November 25, 2013 – Redacted version on web only
E-598	Charalambous, M Letter of Comment dated November 17, 2013 – Redacted version on web only
E-599	Power-Chartrand, C Letter of Comment dated November 24, 2013 – Redacted version on web only
E-600	Clark, D Letter of Comment dated November 26, 2013 – Redacted version on web only
E-601	Clark, W Letter of Comment dated November 16, 2013 – Redacted version on web only
E-601-1	Clark, W Letter of Comment dated December 18, 2013 – Redacted version on web only
E-602	Coffin, S Letter of Comment dated November 21, 2013 – Redacted version on web only
E-603	Colls, H Letter of Comment dated November 17, 2013 – Redacted version on web only
E-604	Corrigall, Y Letter of Comment dated November 17, 2013 – Redacted version on web only
E-604-1	Corrigall, Y Letter of Comment dated December 15, 2013 – Redacted version on web only

Exhibit No.	Description
E-604-2	Corrigall, Y Letter of Comment dated December 15, 2013 – Redacted version on web only
E-605	Creelman, K Letter of Comment dated November 26, 2013 – Redacted version on web only
E-606	Cross, A Letter of Comment dated November 26, 2013 – Redacted version on web only
E-607	Crow, P Letter of Comment dated November 15, 2013 – Redacted version on web only
E-608	Dalgaard, D Letter of Comment dated November 18, 2013 – Redacted version on web only
E-609	Davidson, C Letter of Comment dated November 17, 2013 – Redacted version on web only
E-610	De Blasi, S Letter of Comment dated November 19, 2013 – Redacted version on web only
E-610-1	De Blasi, S Letter of Comment dated December 19, 2013 – Redacted version on web only
E-611	Dhillon, S Letter of Comment dated November 17, 2013 – Redacted version on web only
E-612	Dickmeyer, D Letter of Comment dated November 9, 2013 – Redacted version on web only
E-613	Donnelly, RJ Letter of Comment dated November 24, 2013 – Redacted version on web only
E-614	Donovan, M Letter of Comment dated November 16, 2013 – Redacted version on web only
E-615	Smith, A Letter of Comment dated November 19, 2013 – Redacted version on web only
E-616	Dowker, T Letter of Comment dated November 18, 2013 – Redacted version on web only
E-617	Dunlop, J Letter of Comment dated November 20, 2013 – Redacted version on web only

Exhibit No.	Description
E-618	Dykstra, K Letter of Comment dated November 16, 2013 – Redacted version on web only
E-619	Elena Letter of Comment dated November 26, 2013 – Redacted version on web only
E-620	Elkins, F Letter of Comment dated November 19, 2013 – Redacted version on web only
E-621	Ellis, J Letter of Comment dated November 16, 2013 – Redacted version on web only
E-622	England, H Letter of Comment dated November 26, 2013 – Redacted version on web only
E-623	Farina, G Letter of Comment dated November 26, 2013 – Redacted version on web only
E-624	Farrell, Trent and Kathy Letter of Comment dated November 26, 2013 – Redacted version on web only
E-625	Fiddick, J Letter of Comment dated November 19, 2013 – Redacted version on web only
E-626	Foster, J Letter of Comment dated November 26, 2013 – Redacted version on web only
E-627	Fox, R Letter of Comment dated November 3, 2013 – Redacted version on web only
E-628	Franks, M Letter of Comment dated November 18, 2013 – Redacted version on web only
E-629	Spichtig, O Letter of Comment dated November 25, 2013 – Redacted version on web only
E-630	Giardini, R Letter of Comment dated November 18, 2013 – Redacted version on web only
E-631	Goertzen, Vange and Lee Letter of Comment dated November 18, 2013 – Redacted version on web only
E-632	Goldberg, K Letter of Comment dated November 25, 2013 – Redacted version on web only

Exhibit No.	Description
E-633	Gordon, M Letter of Comment dated November 26, 2013 – Redacted version on web only
E-634	Graham, J Letter of Comment dated November 24, 2013 – Redacted version on web only
E-635	Grossling, B Letter of Comment dated November 15, 2013 – Redacted version on web only
E-636	Grotefeld, E Letter of Comment dated November 18, 2013 – Redacted version on web only
E-637	Haslett, KB Letter of Comment dated November 18, 2013 – Redacted version on web only
E-638	Hayek, D Letter of Comment dated November 18, 2013 – Redacted version on web only
E-639	Heffernan, C Letter of Comment dated November 18, 2013 – Redacted version on web only
E-640	Hilchey, R Letter of Comment dated November 22, 2013 – Redacted version on web only
E-641	Hilton, B Letter of Comment dated November 25, 2013 – Redacted version on web only
E-642	Holvenstot, S Letter of Comment dated November 17, 2013 – Redacted version on web only
E-642-1	Holvenstot, S Letter of Comment dated November 20, 2013 – Redacted version on web only
E-643	Horie Letter of Comment dated November 24, 2013 – Redacted version on web only
E-644	Houghton, J Letter of Comment dated November 18, 2013 – Redacted version on web only
E-645	Hoy, A Letter of Comment dated November 24, 2013 – Redacted version on web only
E-646	Jamin, E Letter of Comment dated November 18, 2013 – Redacted version on web only

Exhibit No.	Description
E-646-1	Jamin, E Letter of Comment dated December 19, 2013 – Redacted version on web only
E-647	Jesse, W Letter of Comment dated November 26, 2013 – Redacted version on web only
E-647-1	Jesse, W Letter of Comment dated November 15, 2013 – Redacted version on web only
E-647-2	Jesse, W Letter of Comment dated December 15, 2013 – Redacted version on web only
E-647-3	Jesse, W Letter of Comment dated December 17, 2013 – Redacted version on web only
E-648	Johnson, C Letter of Comment dated November 15, 2013 – Redacted version on web only
E-648-1	Johnson, C Letter of Comment dated November 18, 2013 – Redacted version on web only
E-649	Jones Letter of Comment dated November 22, 2013 – Redacted version on web only
E-650	Jones, T Letter of Comment dated November 18, 2013 – Redacted version on web only
E-651	Jordan, T Letter of Comment dated November 26, 2013 – Redacted version on web only
E-652	Jorgenson, R Letter of Comment dated November 25, 2013 – Redacted version on web only
E-653	Kamell, MJ Letter of Comment dated November 15, 2013 – Redacted version on web only
E-654	Kegaly, A Letter of Comment dated November 19, 2013 – Redacted version on web only
E-655	Kirkman, G Letter of Comment dated November 16, 2013 – Redacted version on web only
E-655-1	Kirkman, G Letter of Comment dated November 16, 2013 – Redacted version on web only

Exhibit No.	Description
E-655-2	Kirkman, G Letter of Comment dated November 16, 2013 – Redacted version on web only
E-656	Knight, J Letter of Comment dated November 21, 2013 – Redacted version on web only
E-657	Kraskin, Anne and Joseph Letter of Comment dated November 19, 2013 – Redacted version on web only
E-658	Labine, C Letter of Comment dated November 19, 2013 – Redacted version on web only
E-659	Lancaster, G Letter of Comment dated November 23, 2013 – Redacted version on web only
E-660	Lands, E Letter of Comment dated November 17, 2013 – Redacted version on web only
E-660-1	Lands, E Letter of Comment dated November 17, 2013 – Redacted version on web only
E-661	Langmead, D Letter of Comment dated November 17, 2013 – Redacted version on web only
E-662	Leathley, Ted and Nancy Letter of Comment dated November 15, 2013 – Redacted version on web only
E-663	Leavesley, J Letter of Comment dated November 25, 2013 – Redacted version on web only
E-664	Le Corre, Alison and Henry Letter of Comment dated November 15, 2013 – Redacted version on web only
E-665	LeFebvre, Louis and Cecilia Letter of Comment dated November 22, 2013 – Redacted version on web only
E-666	Levan, MB Letter of Comment dated November 18, 2013 – Redacted version on web only
E-667	Lewers, Richard and Ellenora Letter of Comment dated November 18, 2013 – Redacted version on web only
E-668	Lewis, J Letter of Comment dated November 22, 2013 – Redacted version on web only

Exhibit No.	Description
E-669	Lewis, L Letter of Comment dated November 4, 2013 – Redacted versio on web only
E-670	Leyshon, Len and Bonnie Letter of Comment dated November 17, 2013 – Redacted version on web only
E-670-1	Leyshon, R Letter of Comment dated December 9, 2013 – Redacted version on web only
E-670-2	Leyshon Letter of Comment dated December 18, 2013 – Redacted version on web only
E-671	Licata, M Letter of Comment dated November 26, 2013 – Redacted version on web only
E-672	Logan, D Letter of Comment dated November 16, 2013 – Redacted version on web only
E-673	Longpre, D Letter of Comment dated November 18, 2013 – Redacted version on web only
E-674	Lyman, E Letter of Comment dated November 21, 2013 – Redacted version on web only
E-675	Macdonald, Diana and Forbes Letter of Comment dated November 19, 2013 – Redacted version on web only
E-675-1	Macdonald, Diana and Forbes Letter of Comment dated November 28, 2013 – Redacted version on web only
E-676	Macklam, Mike and Loretta Letter of Comment dated November 17, 2013 – Redacted version on web only
E-677	Marsh, K Letter of Comment dated November 21, 2013 – Redacted version on web only
E-678	Martinz, John and Renata Letter of Comment dated November 15, 2013 – Redacted version on web only
E-679	May, N Letter of Comment dated November 16, 2013 – Redacted version on web only
E-680	McCombie, J Letter of Comment dated November 25, 2013 – Redacted version on web only

Exhibit No.	Description
E-681	McCormack, P Letter of Comment dated November 25, 2013 – Redacted version on web only
E-682	McDonald, J Letter of Comment dated November 16, 2013 – Redacted version on web only
E-683	McGrath, J Letter of Comment dated November 20, 2013 – Redacted version on web only
E-684	McLean, RG Letter of Comment dated November 18, 2013 – Redacted version on web only
E-684-1	McLean, R Letter of Comment dated December 11, 2013 – Redacted version on web only
E-684-2	McLean, R Letter of Comment dated December 18, 2013 – Redacted version on web only
E-685	Meilleur, R Letter of Comment dated November 24, 2013 – Redacted version on web only
E-686	Mennie, I Letter of Comment dated November 9, 2013 – Redacted version on web only
E-687	Michie, J Letter of Comment dated November 18, 2013 – Redacted version on web only
E-688	Moir, L Letter of Comment dated November 24, 2013 – Redacted version on web only
E-689	Moniz, E Letter of Comment dated November 25, 2013 – Redacted version on web only
E-690	Moorcroft, R Letter of Comment dated November 21, 2013 – Redacted version on web only
E-691	Murcheson, B Letter of Comment dated November 14, 2013 – Redacted version on web only
E-692	Mutter, MA Letter of Comment dated November 24, 2013 – Redacted version on web only
E-693	Neufeld, Jackie and Kevin Letter of Comment dated November 24, 2013 – Redacted version on web only

Exhibit No.	Description
E-694	Nicol, T Letter of Comment dated November 24, 2013 – Redacted version on web only
E-695	Normandeau, A Letter of Comment dated November 18, 2013 – Redacted version on web only
E-696	O’Donovan, M Letter of Comment dated November 19, 2013 – Redacted version on web only
E-697	Orser, W Letter of Comment dated November 25, 2013 – Redacted version on web only
E-698	Oud, K Letter of Comment dated November 15, 2013 – Redacted version on web only
E-699	Panasiuk, I Letter of Comment dated November 25, 2013 – Redacted version on web only
E-700	Patterson, L Letter of Comment dated November 25, 2013 – Redacted version on web only
E-701	Pendlebury, R Letter of Comment dated November 19, 2013 – Redacted version on web only
E-702	Pender, D Letter of Comment dated November 19, 2013 – Redacted version on web only
E-703	Penny, G Letter of Comment dated November 25, 2013 – Redacted version on web only
E-704	Phillips, SK Letter of Comment dated November 19, 2013 – Redacted version on web only
E-705	Pineiro, D Letter of Comment dated November 15, 2013 – Redacted version on web only
E-705-1	Pineiro, D Letter of Comment dated November 15, 2013 – Redacted version on web only
E-706	Pred, M Letter of Comment dated November 17, 2013 – Redacted version on web only
E-707	Puleston-Clarke, M Letter of Comment dated November 26, 2013 – Redacted version on web only

Exhibit No.	Description
E-708	Purcell, L Letter of Comment dated November 26, 2013 – Redacted version on web only
E-709	Quon, L Letter of Comment dated November 24, 2013 – Redacted version on web only
E-710	Ravenhill, P Letter of Comment dated November 26, 2013 – Redacted version on web only
E-711	Ray, D Letter of Comment dated November 6, 2013 – Redacted version on web only
E-712	Riddell, R, and Boudreau, R Letter of Comment dated November 18, 2013 – Redacted version on web only
E-713	Roper, I Letter of Comment dated November 20, 2013 – Redacted version on web only
E-714	Roper, M Letter of Comment dated November 26, 2013 – Redacted version on web only
E-715	Rosenberg, C Letter of Comment dated November 26, 2013 – Redacted version on web only
E-716	Rosen, J Letter of Comment dated November 14, 2013 – Redacted version on web only
E-717	Russell, S Letter of Comment dated November 24, 2013 – Redacted version on web only
E-718	Samis, K Letter of Comment dated November 24, 2013 – Redacted version on web only
E-719	Lein, Sandy and Gary Letter of Comment dated November 26, 2013 – Redacted version on web only
E-720	Removed - Letter of Comment dated November 15, 2013 – Redacted version on web only
E-721	Seads, A Letter of Comment dated November 26, 2013 – Redacted version on web only
E-721-1	Seads, A Letter of Comment dated December 19, 2013 – Redacted version on web only

Exhibit No.	Description
E-722	Seidman, KR Letter of Comment dated November 20, 2013 – Redacted version on web only
E-723	Solomon, S Letter of Comment dated November 19, 2013 – Redacted version on web only
E-724	Shaw, K Letter of Comment dated November 16, 2013 – Redacted version on web only
E-725	Shroff, F Letter of Comment dated November 15, 2013 – Redacted version on web only
E-726	Simpson, J Letter of Comment dated November 17, 2013 – Redacted version on web only
E-727	Skinder, P Letter of Comment dated November 17, 2013 – Redacted version on web only
E-728	Slosmanis, B Letter of Comment dated November 16, 2013 – Redacted version on web only
E-729	Smith, L Letter of Comment dated November 15, 2013 – Redacted version on web only
E-730	Smolov, A Letter of Comment dated November 22, 2013 – Redacted version on web only
E-731	Spicer, H Letter of Comment dated November 20, 2013 – Redacted version on web only
E-732	Spoor, A Letter of Comment dated November 21, 2013 – Redacted version on web only
E-733	Stuart, L Letter of Comment dated November 24, 2013 – Redacted version on web only
E-734	Subda, P Letter of Comment dated November 19, 2013 – Redacted version on web only
E-735	Guarino, R Letter of Comment dated November 15, 2013 – Redacted version on web only
E-736	Tamarin, E Letter of Comment dated November 26, 2013 – Redacted version on web only

Exhibit No.	Description
E-737	Tennant, PA Letter of Comment dated November 26, 2013 – Redacted version on web only
E-738	Thompson, G Letter of Comment dated November 18, 2013 – Redacted version on web only
E-739	Thomsen, D Letter of Comment dated November 18, 2013 – Redacted version on web only
E-740	Toft, M Letter of Comment dated November 21, 2013 – Redacted version on web only
E-741	Buchan, N, and Drubek, D Letter of Comment dated November 25, 2013 – Redacted version on web only
E-742	Waage, Michael and Wendi Letter of Comment dated November 15, 2013 – Redacted version on web only
E-743	Waddington, B Letter of Comment dated November 16, 2013 – Redacted version on web only
E-744	Watts, A Letter of Comment dated November 21, 2013 – Redacted version on web only
E-745	Wayman, L Letter of Comment dated November 11, 2013 – Redacted version on web only
E-746	Rissling, D Letter of Comment dated November 8, 2013 – Redacted version on web only
E-747	White, J Letter of Comment dated November 26, 2013 – Redacted version on web only
E-748	Wigen, N Letter of Comment dated November 19, 2013 – Redacted version on web only
E-749	Wilkins, C Letter of Comment dated November 15, 2013 – Redacted version on web only
E-750	Willis, E Letter of Comment dated November 15, 2013 – Redacted version on web only
E-751	Woollam, B Letter of Comment dated November 22, 2013 – Redacted version on web only

Exhibit No.	Description
E-752	Wright, I Letter of Comment dated November 18, 2013 – Redacted version on web only
E-753	Yakubowich, Michael and Susan Letter of Comment dated November 26, 2013 – Redacted version on web only
E-754	Young, L Letter of Comment dated November 18, 2013 – Redacted version on web only
E-755	Young, S Letter of Comment dated November 20, 2013 – Redacted version on web only
E-756	Zimmer, B Letter of Comment dated November 15, 2013 – Redacted version on web only
E-757	Young, D Letter of Comment dated November 25, 2013 – Redacted version on web only
E-758	Smith, R Letter of Comment dated November 17, 2013 – Redacted version on web only
E-759	Arcand, L Letter of Comment dated November 26, 2013 – Redacted version on web only
E-760	Benedict, W Letter of Comment dated November 28, 2013 – Redacted version on web only
E-761	Bland, L Letter of Comment dated November 29, 2013 – Redacted version on web only
E-762	Bronstein, H Letter of Comment dated November 27, 2013 – Redacted version on web only
E-763	Brown, JA Letter of Comment dated November 28, 2013 – Redacted version on web only
E-764	Brown, MM Letter of Comment dated November 30, 2013 – Redacted version on web only
E-765	Bryfogle, C Letter of Comment dated November 27, 2013 – Redacted version on web only
E-766	Calder, D Letter of Comment dated November 28, 2013 – Redacted version on web only

Exhibit No.	Description
E-767	Campbell, N Letter of Comment dated November 29, 2013 – Redacted version on web only
E-768	Carr, S Letter of Comment dated November 29, 2013 – Redacted version on web only
E-769	Chapman, A Letter of Comment dated November 29, 2013 – Redacted version on web only
E-770	Churcher, D Letter of Comment dated November 29, 2013 – Redacted version on web only
E-771	Cook, A Letter of Comment dated November 27, 2013 – Redacted version on web only
E-772	Derbyshire, G Letter of Comment dated November 30, 2013 – Redacted version on web only
E-773	Desrochers, M Letter of Comment dated November 27, 2013 – Redacted version on web only
E-774	Dymny, J Letter of Comment dated November 28, 2013 – Redacted version on web only
E-775	Filtness, C Letter of Comment dated December 1, 2013 – Redacted version on web only
E-776	Folkins, J Letter of Comment dated December 1, 2013 – Redacted version on web only
E-777	Garner, M Letter of Comment dated November 30, 2013 – Redacted version on web only
E-778	Gradie, R Letter of Comment dated November 27, 2013 – Redacted version on web only
E-779	Greene, N Letter of Comment dated November 29, 2013 – Redacted version on web only
E-780	Hakes, S Letter of Comment dated December 2, 2013 – Redacted version on web only
E-781	Hendess, K Letter of Comment dated November 29, 2013 – Redacted version on web only

Exhibit No.	Description
E-782	Hofmeier, E Letter of Comment dated November 27, 2013 – Redacted version on web only
E-783	Hopewell, R, and Johnston, M Letter of Comment dated December 2, 2013 – Redacted version on web only
E-784	Hoversland, D Letter of Comment dated November 27, 2013 – Redacted version on web only
E-785	Hughes, R Letter of Comment dated November 29, 2013 – Redacted version on web only
E-786	Jacobsen, C Letter of Comment dated November 28, 2013 – Redacted version on web only
E-787	Spoor, A Letter of Comment dated December 2, 2013 – Redacted version on web only
E-788	Jessup, V Letter of Comment dated November 30, 2013 – Redacted version on web only
E-789	Jordan, G Letter of Comment dated November 27, 2013 – Redacted version on web only
E-790	Jordan, Z Letter of Comment dated December 1, 2013 – Redacted version on web only
E-791	Kaller, E Letter of Comment dated December 1, 2013 – Redacted version on web only
E-792	Kasselman, B Letter of Comment dated November 27, 2013 – Redacted version on web only
E-793	Langer, M Letter of Comment dated November 30, 2013 – Redacted version on web only
E-794	Lans, Rodney and Judy Letter of Comment dated November 29, 2013 – Redacted version on web only
E-795	Lewis, E Letter of Comment dated November 27, 2013 – Redacted version on web only
E-796	Lewis, S Letter of Comment dated November 30, 2013 – Redacted version on web only

Exhibit No.	Description
E-797	Gosselin, M Letter of Comment dated November 29, 2013 – Redacted version on web only
E-798	Malthouse, J Letter of Comment dated November 29, 2013 – Redacted version on web only
E-799	Marston, J Letter of Comment dated December 1, 2013 – Redacted version on web only
E-800	Martz, L Letter of Comment dated November 28, 2013 – Redacted version on web only
E-801	McClelland, M Letter of Comment dated November 30, 2013 – Redacted version on web only
E-802	Morrison, D Letter of Comment dated November 28, 2013 – Redacted version on web only
E-803	Munroe, N Letter of Comment dated December 1, 2013 – Redacted version on web only
E-804	Oakley, J, Uyenaka, P, Gawn, P, and Oakley-Uyenaka, R Letter of Comment dated November 30, 2013 – Redacted version on web only
E-804-1	Uyenaka, P Letter of Comment dated December 19, 2013 – Redacted version on web only
E-805	Parsons, D Letter of Comment dated November 27, 2013 – Redacted version on web only
E-806	Pickett, KL and Hitch, L Letter of Comment dated November 29, 2013 – Redacted version on web only
E-807	Poepperl, H Letter of Comment dated November 30, 2013 – Redacted version on web only
E-808	Price, Katrina and Michael Letter of Comment dated November 29, 2013 – Redacted version on web only
E-809	Radin, S Letter of Comment dated November 28, 2013 – Redacted version on web only
E-810	Sampson, D Letter of Comment dated November 30, 2013 – Redacted version on web only

Exhibit No.	Description
E-811	Schnurr, C Letter of Comment dated November 27, 2013 – Redacted version on web only
E-812	Scott, M Letter of Comment dated December 1, 2013 – Redacted version on web only
E-813	Shewchuk, C Letter of Comment dated December 1, 2013 – Redacted version on web only
E-814	Sing Turner, V Letter of Comment dated November 27, 2013 – Redacted version on web only
E-815	Sparkes, C Letter of Comment dated November 28, 2013 – Redacted version on web only
E-816	Stefanyk, L Letter of Comment dated November 30, 2013 – Redacted version on web only
E-817	Tufts, C Letter of Comment dated November 29, 2013 – Redacted version on web only
E-818	Ubell, T Letter of Comment dated December 1, 2013 – Redacted version on web only
E-819	Walton, Hugh and Jane Letter of Comment dated November 28, 2013 – Redacted version on web only
E-820	Warden, T Letter of Comment dated November 27, 2013 – Redacted version on web only
E-821	Watt, G Letter of Comment dated November 27, 2013 – Redacted version on web only
E-822	Watt, R Letter of Comment dated November 27, 2013 – Redacted version on web only
E-823	White, B Letter of Comment dated November 26, 2013 – Redacted version on web only
E-824	Willis, L Letter of Comment dated November 29, 2013 – Redacted version on web only
E-825	Wilson, A Letter of Comment dated November 29, 2013 – Redacted version on web only

Exhibit No.	Description
E-825-1	Wilson, A Letter of Comment dated January 7, 2014 – Redacted version on web only
E-826	Adams, Gerald and Gina Letter of Comment dated November 14, 2013 – Redacted version on web only
E-827	Barad, N Letter of Comment dated November 22, 2013 – Redacted version on web only
E-828	Bebek, C Letter of Comment dated November 11, 2013 – Redacted version on web only
E-829	Bockman, N Letter of Comment dated November 17, 2013 – Redacted version on web only
E-830	Brewer, G Letter of Comment dated November 27, 2013 – Redacted version on web only
E-831	Calvin, Greta and Calvin Letter of Comment dated November 28, 2013 – Redacted version on web only
E-832	Cassidy, Joy and Bill, Labonte, Mario, Yvon and Emily Letter of Comment dated November 16, 2013 – Redacted version on web only
E-833	Corry, M Letter of Comment dated November 25, 2013 – Redacted version on web only
E-834	Couture, D Letter of Comment dated November 23, 2013 – Redacted version on web only
E-835	Cox, K Letter of Comment dated November 14, 2013 – Redacted version on web only
E-836	D’Angelo, R Letter of Comment dated November 28, 2013 – Redacted version on web only
E-837	Davison, Christa and Terry Letter of Comment dated November 2013 – Redacted version on web only
E-838	Dicker, GN Letter of Comment dated November 19, 2013 – Redacted version on web only
E-839	Fell, J Letter of Comment dated November 14, 2013 – Redacted version on web only

Exhibit No.	Description
E-840	Vander Geest, Henk and Gina Letter of Comment dated December 2, 2013 – Redacted version on web only
E-841	Galusha, R Letter of Comment dated September 6, 2013 – Redacted version on web only
E-842	Gillam, Tom and Helen Letter of Comment dated November 29, 2013 – Redacted version on web only
E-843	Goddard, G Letter of Comment dated November 27, 2013 – Redacted version on web only
E-844	Gouin, M Letter of Comment dated November 2013 – Redacted version on web only
E-845	Hart, G Letter of Comment dated November 26, 2013 – Redacted version on web only
E-846	Heib, W Letter of Comment dated November 2013 – Redacted version on web only
E-847	Hendricks, B Letter of Comment dated November 13, 2013 – Redacted version on web only
E-848	Johnson, Debbie and Evan Letter of Comment dated November 26, 2013 – Redacted version on web only
E-849	Larsen, S Letter of Comment dated November 26, 2013 – Redacted version on web only
E-850	Leggett, M Letter of Comment dated November 17, 2013 – Redacted version on web only
E-851	Lyes, M Letter of Comment dated November 18, 2013 – Redacted version on web only
E-852	Macguffie, A Letter of Comment dated November 25, 2013 – Redacted version on web only
E-853	Marining, R Letter of Comment dated November 15, 2013 – Redacted version on web only
E-854	Meyer, Lorraine and Brian Letter of Comment dated November 20, 2013 – Redacted version on web only

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Exhibit No.	Description
E-855	Pringle, J Letter of Comment dated November 18, 2013 – Redacted version on web only
E-856	Rogers, J Letter of Comment dated November 15, 2013 – Redacted version on web only
E-857	Rompere, S Letter of Comment dated November 20, 2013 – Redacted version on web only
E-858	Struyk, LG Letter of Comment dated November 20, 2013 – Redacted version on web only
E-859	Sullivan, I Letter of Comment dated November 28, 2013 – Redacted version on web only
E-860	Tomm, D Letter of Comment dated November 23, 2013 – Redacted version on web only
E-861	Vey, M Letter of Comment dated November 12, 2013 – Redacted version on web only
E-862	Ward, R Letter of Comment dated November 18, 2013 – Redacted version on web only
E-863	Warren, JM Letter of Comment dated November 19, 2013 – Redacted version on web only
E-864	Wilson, M Letter of Comment dated November 16, 2013 – Redacted version on web only
E-865	Churchill, W Letter of Comment dated November 18, 2013 – Redacted version on web only
E-866	Longini, R Letter of Comment dated November 18, 2013 – Redacted version on web only
E-867	Marguis, L Letter of Comment dated November 14, 2013 – Redacted version on web only
E-868	Rush, D Letter of Comment dated December 2013 – Redacted version on web only
E-869	Barz, D Letter of Comment dated December 5, 2013 – Redacted version on web only

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Exhibit No.	Description
E-870	Benoit, B Letter of Comment dated December 4, 2013 – Redacted version on web only
E-871	Chubbard Letter of Comment dated December 9, 2013 – Redacted version on web only
E-872	Cocksedge, Patricia and Graham Letter of Comment dated December 4, 2013 – Redacted version on web only
E-873	B, Daniel Letter of Comment dated December 5, 2013 – Redacted version on web only
E-874	DeMelo, S Letter of Comment dated December 5, 2013 – Redacted version on web only
E-875	Desorcy, S Letter of Comment dated December 4, 2013 – Redacted version on web only
E-876	Dixon, L Letter of Comment dated December 3, 2013 – Redacted version on web only
E-877	Foster, Dave and Martha Letter of Comment dated December 4, 2013 – Redacted version on web only
E-878	Fox, H Letter of Comment dated December 4, 2013 – Redacted version on web only
E-879	Froese, I Letter of Comment dated December 8, 2013 – Redacted version on web only
E-880	Hall, D Letter of Comment dated December 3, 2013 – Redacted version on web only
E-881	Holmes, W Letter of Comment dated December 5, 2013 – Redacted version on web only
E-882	Kasasian, K Letter of Comment dated December 2, 2013 – Redacted version on web only
E-883	Kelly, Lillian and Jim Letter of Comment dated December 4, 2013 – Redacted version on web only
E-884	Murray, J Letter of Comment dated December 9, 2013 – Redacted version on web only

Exhibit No.	Description
E-885	Nokes, Frances and David Letter of Comment dated December 5, 2013 – Redacted version on web only
E-886	Pankratz, R Letter of Comment dated December 8, 2013 – Redacted version on web only
E-887	Procaccini, M Letter of Comment dated November 27, 2013 – Redacted version on web only
E-888	Satchwell, S Letter of Comment dated December 3, 2013 – Redacted version on web only
E-889	Sinclair, J Letter of Comment dated December 8, 2013 – Redacted version on web only
E-890	Thomas, J Letter of Comment dated December 3, 2013 – Redacted version on web only
E-891	Walker, J Letter of Comment dated December 6, 2013 – Redacted version on web only
E-892	Work, D Letter of Comment dated December 9, 2013 – Redacted version on web only
E-893	Hollings, Calvin and Maureen Letter of Comment dated December 10, 2013 – Redacted version on web only
E-894	Bywater, Gary and Sharon Letter of Comment dated December 4, 2013 – Redacted version on web only
E-895	Arsenault, DS Letter of Comment dated December 14, 2013 – Redacted version on web only
E-895-1	Arsenault, DS Letter of Comment dated December 14, 2013 – Redacted version on web only
E-895-2	Arsenault, DS Letter of Comment dated December 19, 2013 – Redacted version on web only
E-896	Bienz, OM Letter of Comment dated December 13, 2013 – Redacted version on web only
E-897	Campbell, L Letter of Comment dated December 15, 2013 – Redacted version on web only

Exhibit No.	Description
E-898	Chalmers, C Letter of Comment dated December 12, 2013 – Redacted version on web only
E-899	Charleston, R Letter of Comment dated December 15, 2013 – Redacted version on web only
E-900	Dunn, K Letter of Comment dated December 13, 2013 – Redacted version on web only
E-901	Endisch, P Letter of Comment dated December 12, 2013 – Redacted version on web only
E-902	Gavin, G Letter of Comment dated December 12, 2013 – Redacted version on web only
E-903	Graham, H Letter of Comment dated December 13, 2013 – Redacted version on web only
E-904	Hutton, N Letter of Comment dated December 12, 2013 – Redacted version on web only
E-905	Koppa, CA Letter of Comment dated December 2013 – Redacted version on web only
E-906	Lawrence, J Letter of Comment dated December 15, 2013 – Redacted version on web only
E-906-1	Lawrence, J Letter of Comment dated December 12, 2013 – Redacted version on web only
E-907	Morton, C Letter of Comment dated December 11, 2013 – Redacted version on web only
E-908	Paine, S Letter of Comment dated December 12, 2013 – Redacted version on web only
E-909	Pollen, Doug and Elaine Letter of Comment dated December 15, 2013 – Redacted version on web only
E-910	Pratt, S Letter of Comment dated December 13, 2013 – Redacted version on web only
E-911	Shipley, P Letter of Comment dated December 15, 2013 – Redacted version on web only

Exhibit No.	Description
E-912	Smith, C Letter of Comment dated December 13, 2013 – Redacted version on web only
E-913	Volansky, M Letter of Comment dated December 15, 2013 – Redacted version on web only
E-914	Walker, R Letter of Comment dated December 15, 2013 – Redacted version on web only
E-915	Wartenberg, M Letter of Comment dated December 15, 2013 – Redacted version on web only
E-916	Zak, E Letter of Comment dated December 12, 2013 – Redacted version on web only
E-917	Bastedo, C, and Boyle, J Letter of Comment dated December 16, 2013 – Redacted version on web only
E-918	Burns, C Letter of Comment dated December 16, 2013 – Redacted version on web only
E-919	Evans, James and Jacqueline Letter of Comment dated December 16, 2013 – Redacted version on web only
E-920	Kerr, M Letter of Comment dated December 16, 2013 – Redacted version on web only
E-921	Pafford, R Letter of Comment dated December 16, 2013 – Redacted version on web only
E-922	Roberts, J Letter of Comment dated December 16, 2013 – Redacted version on web only
E-923	Schulz, M Letter of Comment dated December 16, 2013 – Redacted version on web only
E-923-1	Schulz, M Letter of Comment dated January 15, 2014 – Redacted version on web only
E-924	Anderson, R Letter of Comment dated December 17, 2013 – Redacted version on web only
E-925	Bower, J Letter of Comment dated December 17, 2013 – Redacted version on web only

Exhibit No.	Description
E-926	Brown, C Letter of Comment dated December 17, 2013 – Redacted version on web only
E-927	Chapple, G Letter of Comment dated December 17, 2013 – Redacted version on web only
E-928	Chodeck, C Letter of Comment dated December 17, 2013 – Redacted version on web only
E-929	Coleman, RF Letter of Comment dated December 17, 2013 – Redacted version on web only
E-929-1	Coleman, RF Letter of Comment dated December 18, 2013 – Redacted version on web only
E-930	D’lorio, RB Letter of Comment dated December 17, 2013 – Redacted version on web only
E-931	Hubert, E Letter of Comment dated December 16, 2013 – Redacted version on web only
E-932	Lawrie, AJ Letter of Comment dated December 17, 2013 – Redacted version on web only
E-932-1	Lawrie, AJ Letter of Comment dated December 18, 2013 – Redacted version on web only
E-933	MacGillivray, B Letter of Comment dated December 17, 2013 – Redacted version on web only
E-934	McLaren, R Letter of Comment dated December 17, 2013 – Redacted version on web only
E-935	McLean, C Letter of Comment dated December 17, 2013 – Redacted version on web only
E-936	Meyers, B Letter of Comment dated December 17, 2013 – Redacted version on web only
E-937	Postnikoff, C Letter of Comment dated December 17, 2013 – Redacted version on web only
E-938	Borek, E Letter of Comment dated December 18, 2013 – Redacted version on web only

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Exhibit No.	Description
E-939	Carson, A Letter of Comment dated December 18, 2013 – Redacted version on web only
E-940	Foss, A Letter of Comment dated December 18, 2013 – Redacted version on web only
E-941	Guay, F, and Cleggett, C Letter of Comment dated December 18, 2013 – Redacted version on web only
E-942	Harrison, G, and Carr, L Letter of Comment dated December 18, 2013 – Redacted version on web only
E-943	Hedges, M Letter of Comment dated December 18, 2013 – Redacted version on web only
E-944	Mathias, K Letter of Comment dated December 18, 2013 – Redacted version on web only
E-945	Miller, Brian and Eldoreen Letter of Comment dated December 18, 2013 – Redacted version on web only
E-946	Pascall, E Letter of Comment dated December 18, 2013 – Redacted version on web only
E-947	Round, R Letter of Comment dated December 18, 2013 – Redacted version on web only
E-948	Volovsek, Y Letter of Comment dated December 18, 2013 – Redacted version on web only
E-949	Wellspring-Wood, Geoffrey and Barbara Letter of Comment dated December 18, 2013 – Redacted version on web only
E-950	Amyoony, P Letter of Comment dated December 19, 2013 – Redacted version on web only
E-951	Anna Letter of Comment dated December 19, 2013 – Redacted version on web only
E-952	Backs, K Letter of Comment dated December 19, 2013 – Redacted version on web only
E-953	Berry, J Letter of Comment December 19, 2013 – Redacted version on web only

Exhibit No.	Description
E-954	Black, T Letter of Comment dated December 19, 2013 – Redacted version on web only
E-955	Chin, R Letter of Comment dated December 19, 2013 – Redacted version on web only
E-956	Dixon, S Letter of Comment dated December 19, 2013 – Redacted version on web only
E-957	Freebairn, M Letter of Comment dated December 19, 2013 – Redacted version on web only
E-957-1	Freebairn, M Letter of Comment dated December 19, 2013 – Redacted version on web only
E-958	Godard, Florence and Bill Letter of Comment dated December 19, 2013 – Redacted version on web only
E-959	Gustavs, K Letter of Comment dated December 19, 2013 – Redacted version on web only
E-960	Harcourt, K Letter of Comment dated December 19, 2013 – Redacted version on web only
E-961	Horsnell, J Letter of Comment dated December 19, 2013 – Redacted version on web only
E-962	Wenger, J Letter of Comment dated December 19, 2013 – Redacted version on web only
E-963	Jones, S Letter of Comment dated December 19, 2013 – Redacted version on web only
E-964	Mckirdy, B Letter of Comment dated December 19, 2013 – Redacted version on web only
E-965	Robbins, P Letter of Comment dated December 19, 2013 – Redacted version on web only
E-966	Vanderlinde, G Letter of Comment dated December 19, 2013 – Redacted version on web only
E-966-1	Vanderlinde, G Letter of Comment dated December 20, 2013 – Redacted version on web only

Exhibit No.	Description
E-967	Von Gunten, JE Letter of Comment dated December 19, 2013 – Redacted version on web only
E-968	Warrington, L Letter of Comment dated December 19, 2013 – Redacted version on web only
E-969	Warwarick, M Letter of Comment dated December 19, 2013 – Redacted version on web only
E-970	Wenger, H Letter of Comment dated December 19, 2013 – Redacted version on web only
E-971	Berndt, Catharine and David Letter of Comment dated December 21, 2013 – Redacted version on web only
E-972	Bourgeois, W Letter of Comment dated December 19, 2013 – Redacted version on web only
E-973	Giesbrecht, L Letter of Comment dated December 20, 2013 – Redacted version on web only
E-973-1	Giesbrecht, L Letter of Comment dated January 6, 2014 – Redacted version on web only
E-974	Goudriaan, GB Letter of Comment dated December 20, 2013 – Redacted version on web only
E-975	Jeske, R Letter of Comment dated December 20, 2013 – Redacted version on web only
E-976	Loyer, W Letter of Comment dated December 18, 2013 – Redacted version on web only
E-977	Lum, J Letter of Comment dated December 19, 2013 – Redacted version on web only
E-978	Monkman, D, and Broughton, G Letter of Comment dated December 18, 2013 – Redacted version on web only
E-979	Morris, R Letter of Comment dated December 20, 2013 – Redacted version on web only
E-980	Ridout, S Letter of Comment dated December 20, 2013 – Redacted version on web only

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Exhibit No.	Description
E-981	Fitz-James, M Letter of Comment dated December 19, 2013 – Redacted version on web only
E-982	Hall, E Letter of Comment dated December 27, 2013 – Redacted version on web only
E-983	Johnston, P Letter of Comment dated December 28, 2013 – Redacted version on web only
E-984	Masui, S Letter of Comment dated December 22, 2013 – Redacted version on web only
E-985	McFarlane, J Letter of Comment dated December 2013 – Redacted version on web only
E-986	Moore, D Letter of Comment dated December 2013 – Redacted version on web only
E-987	Varaleau, Bob and Myrna Letter of Comment dated December 15, 2013 – Redacted version on web only
E-988	Proudfoot, Edward and Irene Letter of Comment dated December 2013 – Redacted version on web only
E-989	Lones, S Letter of Comment dated December 30, 2013 – Redacted version on web only
E-990	Bagshaw, P Letter of Comment dated January 1, 2014 – Redacted version on web only
E-991	Bates, AC Letter of Comment dated December 31, 2013 – Redacted version on web only
E-992	Alstad, D Letter of Comment dated January 5, 2014 – Redacted version on web only
E-993	Wood, AS Letter of Comment dated January 4, 2014 – Redacted version on web only
E-994	Dahl, V Letter of Comment dated January 7, 2014 – Redacted version on web only
E-995	Goodall, C Letter of Comment dated January 7, 2014 – Redacted version on web only

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Exhibit No.	Description
E-996	Proctor, G Letter of Comment dated January 12, 2014 – Redacted version on web only
E-997	Shoemaker, D Letter of Comment dated January 11, 2014 – Redacted version on web only
E-998	Campbell, J Letter of Comment dated January 15, 2014 – Redacted version on web only
E-999	Morison, Sher and Garth Letter of Comment dated January 10, 2014 – Redacted version on web only
E-1000	Ross, K Letter of Comment dated January 14, 2014 – Redacted version on web only
E-1001	Voigt, D Letter of Comment dated October 15, 2013 – Redacted version on web only
E-1002	Klauzer, L Letter of Comment dated October 15, 2013 – Redacted version on web only
E-1003	Chambers, L Letter of Comment dated October 15, 2013 – Redacted version on web only
E-1004	Williams, L Letter of Comment dated February 13, 2014 – Redacted version on web only
E-1005	Reid, T Letter of Comment dated February 4, 2014 – Redacted version on web only
E-1006	Sjodin, D Letter of Comment dated February 13, 2014 – Redacted version on web only
E-1007	Lewko, Jason Letter of Comment dated February 14, 2014 – Redacted version on web only
E-1008	Cash, D Letter of Comment dated February 7, 2014 – Redacted version on web only
E-1009	Kaljur, S Letter of Comment dated November 1, 2013 – Redacted version on web only

LIST OF ACRONYMS

Acronym	Definition
Application	Application for Approval of Charges Related to Meter Choices Program
BC Hydro	British Columbia Hydro and Power Authority
BCPSO	British Columbia Pensioners' and Seniors' Organization et al.
BCSEA	B.C. Sustainable Energy Association and the Sierra Club of B.C
CEC	Commercial Energy Consumers Association of British Columbia
<i>Charter</i>	<i>Canadian Charter of Rights and Freedoms</i>
Commission, BCUC	British Columbia Utilities Commission
CSR	customer service representative
CSTS	Citizens for Safe Technology Society
EVP	Energy Visualization Portal
FMA	Field Meter Analyst
IR	Information Request
IT	information technology
Program	Meter Choices Program
RDCK	Electoral Area D Regional District of Central Kootenay
SMI	Smart Metering and Infrastructure
SMSG	Smart Meter and Smart Grid
TTO	Training and Transition to Operations
UCA	<i>Utilities Commission Act</i>
WAN	wide area network