

Jayne Priest (CORRECTED COPY)
Intervener

October 19, 2015

EMAIL TO

Erica Hamilton
Commission Secretary
BC Utilities Commission
6th Floor 900 Howe St
Vancouver, BC V6Z 2N3

Re: Submission on BC Hydro 2015 Rate Design Application Issues in Appendix B to Order G-156-15

- **Proper notification and time to prepare submissions is critical for this to truly be a public process**

I requested addition time to prepare my submission because I did not receive notification from BC Hydro. I want to stress that there is a need for better notification and would like to know where and when the public notice was posted.

It appears from the submissions and application (page 412) that a workshop of stakeholders was held in approx. July, 2015. I consider myself and all British Columbians that are residential customers to be stakeholders in these proceedings but I was not invited or informed of this workshop and consequently have also not had anywhere near the notification or time to prepare as it's participants which I think is unfair. This should be addressed and discussed.

When reviewing the 4, 902 page BC Hydro application, what strikes me is how complicated and inaccessible this process is to British Columbians like myself, the residential customer. This application has taken a great deal of time to prepare and sufficient time is needed to review it and prepare a submission. This is critical for the public to have input into this process. The less than one week I have had since I "heard" about it is completely inadequate. Even if I had received notification I would have at the most only two weeks. Four weeks is more realistic. Out of necessity I have had to prepare a brief outline of my main concern.

- **Complaint**
My complaint focuses on BC Hydro's Legacy Meter charges and Failed Installation charges and the increasing charges for electrical services. These so

called Meter Choices Program charges are under section 11.3 Electric Tariff Failed Installation Charge, Legacy Meter Charge, Radio-off Meter Installation Charges, etc. This issue may be covered under #1 and possibly under #3 and #5 Other issues.

As a stakeholder in this process I am requesting that the Meter Choices Program 6 charges be reviewed as part of 2015 RDA Module 1, so that it's addressed sooner by the Commission and BC Hydro and preferably by January of 2016.

I BC Hydro has been charging me and other stakeholders these amounts since approx. March, 2014. I am paying them without prejudice to my right to claim these fees back through a class action lawsuit. It is costing me an extra \$34.00 per month for a legacy meter with essentially the same service I had before and consider it a "rate increase." The cost of these charges is adding up and must be addressed as soon as possible.

One strategy that appears to be used more frequently by companies, and municipalities, is to maintain the same rates for their services or taxes, but to charge an increasing number of separate fees. This in effect transfers costs to customers and is a rate increase without appearing to increase rates.

MANY STAKEHOLDERS LIKE MYSELF HAVE BEEN PRESSURED AND BULLIED. THERE HAS BEEN A LACK OF REGULATORY OVERSIGHT INTO THE SMART METER PROGRAM THROUGH ENACTING A LAW. WE HAVE LEGITIMATE CONCERNS AND A DEMOCRATIC RIGHT TO CHOOSE AND ACT PROACTIVELY TO PROTECT OUR OWN HEALTH AND SHOULD NOT BE PENALIZED FOR IT. THESE CHARGES ARE YET ANOTHER MEANS TO PUT PRESSURE ON CUSTOMERS, FORCING THEM INTO GETTING A SMART METER INSTALLED OR PAYING ADDITIONAL COSTS. THIS IS PARTICULARLY A CONCERN FOR LOW INCOME PEOPLE. HOW ARE PEOPLE EXPECTED TO PAY ALL OF THESE INCREASING COSTS?

I am paying \$34.00 per month, but my meter is not read monthly. How it's assessed is completely wrong.

These charges are completely unjustifiable. Prior to smart meters the cost of reading meters was so low it was included in the bill with no extra heading. Now we are paying separately for it.

Any extra charges (if they are justifiable at all) should be made on a cost basis. I am requesting an itemized accounting from BC Hydro of the costs to read an analog, digital or radio off meter, and would like the opportunity to scrutinize these costs and request that the commission do this.

In other jurisdictions charges for retaining analog or digital meters have been dropped or significantly reduced, but there has been no change in British Columbia.

Part of the increasing costs and shortfalls of Hydro is it's investment in this expensive new technology, and it appears that customers that are retaining existing meters are subsidizing it. It does not cost any more money to retain the existing meter but I am being charged extra fees, while the estimated \$500 cost of buying and installing a new smart meter are not charged to customers. I am requesting a detailed cost accounting (to buy, install, maintain, length of service projections etc) of the cost of retaining existing meters vs smart meters from BC Hydro.

I am requesting that all corrections to the legacy meter charges, radio off meters, and failed installation charges be made retroactively to the date that BC Hydro began billing for them.

I wish to participate at the hearings on the 2015 Rate Design Review and to present evidence and ask questions of BC Hydro and reserve the right to present witnesses as needed.

Please contact me if you have any questions or need clarification.

Thank you

Jayne Priest