

2015 October 19

BC Utilities Commission
6th Floor 900 Howe Street Vancouver, BC V6Z 2N3
VIA EMAIL to commission.secretary@bcuc.com

attn: Erica Hamilton, Commission Secretary

Re: BC Hydro (BCH) 2015 RDA; Appendix B to order G-156-15 - SmartMeters

Further to my October 16 online registration as an intervenor and to my telecons with Erica Hamilton assuring me that the deadline for submission is 11:59 PM today, I hereby provide this initial response to the Commission's invitation for submissions.

I object strenuously to the imposition of so-called "Smart-meters" (Smeters) and punitive charges which constitute an effective rate increase which was apparently not approved by BCUC, and which I hope the BCUC will rectify.

As an electrical engineer with a research Master's degree and decades of relevant experience, I am qualified to assess the Smeter boondoggle. I assure you that Smeters lack merit and introduce needless security, health and fire risks, although that may be outside BCUC's mandate. I can provide details upon request.

BCH and Corix intimidation to accept a Smeter

I posted a notice to Corix and BCH prohibiting them from trespassing to install a Smeter.

Neighbours and relatives who refused Smeters had their meters swapped when they weren't home despite posted notices prohibiting this.

On 2012 June 11, after enduring many time-wasting telephone menus and long periods "on hold", I reached Hydro to explain my insistence on retaining my safe, reliable, accurate, secure Sangamo analog KWh meter. I was threatened with hydro disconnection. I was eventually transferred to a Corix representative who again rejected logic and ultimately said "if I can't convince you, I'll transfer you to a team of specialists who will convince you." I was then transferred back to BCH. After a good discussion, the BCH rep agreed with my position and kindly said that she would register my objection.

In addition there have been many letters which attempted to trick or intimidate me into accepting a Smeter.

Attempts to purportedly replace my meter with another analog

Because of the above bullying, prevarication, and the prevalence of telephone scams, I was suspicious when I received a telephone call 2015 July 22 at 8:20 PM from "Ray" telling me to "leave my locked gate open and keep my big dog inside" the next day so he could exchange my Sangamo meter because its seal had expired. As I had received no written request from Hydro, I of course politely declined - twice. The next BCH bill included a Failed Installation Charge of \$65 which I contend is not warranted because I had received no written advance notice.

Unjustified Legacy Meter charges

In addition to the above Failed Installation charge, BCH is increasing charges for electricity, under its so called "Meter Choices Program". As an injured stakeholder I am requesting that the Meter Choices charges be reviewed as part of 2015 RDA Module 1, so that it will be addressed expeditiously by BCUC and BC Hydro, preferably by 2016 January.

To prevent disconnection, I am paying Failed Installation and legacy meter charges under protest without prejudice to my right to claim these fees back through a class action lawsuit. BCH charges me an extra \$64.80 every other month for my legacy meter with essentially the same service that I had before. I therefore consider it to be a huge rate increase - approximately tripling my energy charge for June 24 to August 24 when my "energy charge was \$39.29 for two months.

This is consistent with the increasingly frequent corporate and utility strategy of maintaining the same rates for services or taxes, but charging extra fees. This transfers costs to customers and is therefore a rate increase without appearing to be.

Many stakeholders like myself have been pressured and bullied. There has been a lack of regulatory oversight of this program. We have legitimate concerns and the right to protect our security, safety and health and should not be penalized for it in a democracy.

These charges are completely unjustifiable. Prior to the Smeter boondoggle, the cost of reading meters was so low that it was included in the bill with energy costs. Now we are paying separately for it. Please assess and publish the actual cost of manual meter reading.

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

A significant part of BCH's increasing cost of operation is it's commitment to the Smeter boondoggle. Customers who retain their analog meters are subsidizing Smeters for those who have been bullied into accepting them. It does not cost any more money to retain the existing analog meters but I am being charged extra fees, while the estimated \$1000 cost of installing a new smart meter complete with its radio network and programming is not charged to customers. I am requesting a detailed cost accounting (of purchase price of meters and their wireless network, installation and software costs, maintenance, length of service projections, etc) of retaining existing analog meters vs Smeters.

Reversal of the extorted legacy meter charges should be made retroactive to the date that BC Hydro began billing for them.

Threats of disconnection

Please prohibit BCH from disconnecting, or threatening to disconnect, customers who retain their analog meters.

Other matters

As an electrical engineer, I can attest that Smeters provide no security to the grid since they fortunately have no disconnect capability as yet. If/when they do, the grid can easily be made unstable by hacking.

Changing Smeter readings is easy, which is consistent with inexplicably high bills associated with Smeters. Analog meters are fool-proof, in that customers can easily check them as I always do.

Deadline Extension

BCH lacked the courtesy to inform me of the 2015 RDA, so I didn't discover it until October 14, when I applied as an intervenor. It is customary and reasonable, if not legally required, for proponents to notify stakeholders well in advance. There was no notice of the preparatory workshops. Furthermore, the 24 day comment period to review the obscure 4902 page RDA is inadequate to say the least.

As BCH's next Rate Design Application will likely not be filed before 2020 (and possibly much later) it is important for stakeholders to present comprehensive and carefully considered evidence so that, despite government interference, the Commission can direct BCH to implement equitable measures in the near future.

I therefore hereby join many other intervenors in requesting an extension to review this lengthy application and request permission to submit supplementary evidence. Furthermore, I strongly suggest that BCUC require BCH to adequately notify all customers and other stakeholders of future reviews.

Since privatization, BCH has lost the high esteem which it previously enjoyed and is fostering a well-deserved reputation as a pariah. I urge BCUC to direct BCH to reverse this tragic trend.

Please confirm receipt of this email.

Respectfully submitted in haste,

C. Bruce Edwards BAsc MAsc
36223 Hartley Rd
Mission BC V2V 0A9
604-820-3646