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VIA COMMISSION E-FILING

British Columbia Utilities Commission
6th Floor – 900 Howe Street
Vancouver, BC V6Z 2V3

Attention: Laurel Ross, Acting Commission Secretary

Dear Sirs/Mesdames:

**Re: BC Hydro 2015 Rate Design Application (RDA)
Association of Major Power Customers (AMPC) Information Request No. 1
to BC Hydro**

We are legal counsel to AMPC in this matter. Further to the Regulatory Timetable set out in Commission Orders G-166-15 and G-12-16, enclosed please find AMPC's Information Request No. 2 to BC Hydro.

Please contact the writer if you have any questions.

Yours truly,

Bull, Housser & Tupper LLP

A handwritten signature in black ink, appearing to read 'Matthew D. Keen', is written over a horizontal line.

Matthew D. Keen

**ASSOCIATION OF MAJOR POWER CUSTOMERS OF BC (AMPC)
INFORMATION REQUEST NO. 2
TO BC HYDRO**

**British Columbia Hydro and Power Authority (BC Hydro)
2015 Rate Design Application Module 1**

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A. PROPOSED ELECTRIC TARIFF AMENDMENTS

1.0 Reference: Exhibit B-1-1, BC Hydro’s Proposed Electric Tariff Amendments, Appendix G-1A, p. 15 of 202.

The Definition of “customer” in the proposed revised tariff is:

Person whose application for Service has been accepted by BC Hydro or, in the absence of such an application, the Person with possession of the Premises to which Service is provided or the Owner or such other Person designated as the Customer pursuant to the Electric Tariff. If a Customer receives Service at more than one Premises, such Customer will be considered a separate Customer for each Premises.

BC Hydro will determine the number of Premises for the purpose of this definition.

- 1.1 Please explain why the phrase “receiving service from BC Hydro” has been removed from the earlier definition.
- 1.2 Does the definition of customer now include those receiving service from a third party, such as a merchant line provider?

2.0 Reference: Exhibit B-1-1, BC Hydro’s Proposed Electric Tariff Amendments, Appendix G-1A, p. 15 of 202.

The Definition of “demand” in the proposed revised tariff is:

The rate at which electric energy is used in any instant or averaged over any designated period of time, measured in kilowatts (kW) or kilovolt amperes (kVA).

- 2.1 Please explain why no particular time interval is specified in the above definition.
- 2.2 Please confirm that BC Hydro uses the same demand interval for all customers, and describe what that time interval is in minutes. If not confirmed, please identify the differing intervals and explain why this is not unduly discriminatory.
- 2.3 Is BC Hydro considering a change in the demand interval in the future? If so, please fully explain (1) the purpose of the change, and (2) why the electric tariff cannot be amended at the time the change is proposed.
- 2.4 Please fully explain where kVA is used as the measure of demand and where kW is the preferred unit of measure. Please explain why BC Hydro would not use one or the other measure consistently throughout the tariff.

3.0 Reference: Exhibit B-1-1, BC Hydro’s Proposed Electric Tariff Amendments, Appendix G-1A, p. 18 of 202.

The Definition of “point of delivery” in the proposed revised tariff is:

The location at which the Service Connection is connected to the Metering Equipment or the Customer’s electrical facilities, whichever comes first.

- 3.1 Please fully explain why the point of delivery is not more simply defined as the point where the change in ownership of electrical facilities occurs – such as the service drop termination.
- 3.2 Please confirm that the location of metering is irrelevant to the point of delivery, as long as an appropriate loss adjustment is made when the meter is not located immediately adjacent to the point of delivery.

B. RS 1823

4.0 References:

Exhibit B-1, Application, Section 7.2.2, p. 7-9 to 7-10.

Exhibit B-1, Application, Appendix C-5A, Consideration Memo 5, p. 91 of 292.

BC Hydro discusses the three pricing options for the application of the RRA rate increases.

- 4.1 Please confirm that only Option 1 achieves bill neutrality.
- 4.2 Please confirm that Option 1 is the only option that achieves forecast revenue neutrality in any of the three forecast years.
- 4.3 Please confirm that, of the three options, Option 1 best achieves the Bonbright efficiency criteria identified by BC Hydro, including rate and bill stability, and customer understanding and acceptance.

5.0 Reference: Exhibit B-1, Application, Section 7.2.2, p. 7-13.

BC Hydro describes how the “bill neutrality definition of revenue neutrality is unique to RS 1823”, and that “RIB, LGS, MGS and SGS rates are determined on a forecast revenue neutrality basis”.

- 5.1 Please confirm that, all other things being equal, RS 1823 customers that achieve conservation gains will pay higher rates with a rate schedule based on a forecast revenue neutrality definition relative to a rate schedule based on a bill neutrality definition.