



British Columbia Utilities Commission

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Letter of Comment

In accordance with the Commission's Rules of Practice and Procedure, to submit a letter of comment concerning an application currently before the Commission, please provide a completed form to commission.secretary@bcuc.com. If email is unavailable, please mail the form to the address above. By doing so, you acknowledge that all letters of comment are published with the author's name as part of the public evidentiary record, both in print copy and on the Commission's website. All personal contact information provided on this page is removed before posting to the website. Forms must be received by the Commission by the last filing date included in the proceeding's regulatory timetable before final arguments.

Proceeding name

NET METERING PROGRAM TARIFF UPDATE

Are you currently registered as an intervener or interested party?

NO

APPLICATION

Name (first and last)

PHILIP TROTTER, MICHELLE POULIN

City

[REDACTED]

Province

P.G.

Email

[REDACTED]

Letter of Comment

Name (first and last)

MICHELLE POULIN

Date:

PHILIP TROTTER

JULY 27/16
JULY 27/16

Comment: Please specify the reasons for your interest in the proceeding, your views concerning the proceeding, any relevant information that supports or explains your views, the conclusion you support and any recommendations. The Commission may disallow comments that do not comply with the Rules of Practice and Procedure.

SEE ATTACHED

PHOTO EVIDENCE FROM THE MURKIN

OK

THIS IS NOT AN EXHIBIT AS DEFINED BY THE FOIPPA

PHOTO EVIDENCE FROM THE MURKIN

91-1449

(not less than) witness

PHOTO EVIDENCE FROM THE MURKIN

91-1449

PD

From: Michelle Poulin [REDACTED]
Sent: Wednesday, July 27, 2016 5:08 PM
To: Commission Secretary BCUC:EX
Subject: Net Metering Program Tariff Update Application
Attachments: CCF07272016_0000.pdf; CCF07272016_0001.pdf

British Columbia Utilities Commission,
Sixth Floor 900 Howe Street
Vancouver, B.C. V6Z 2N3

Attention: Ms. Laurel Ross, Acting Commission Secretary and Director

Dear Ms. Ross

I write to strongly disagree with FortisBC's claim, in its application before the Commission, that its "Net Metering Program Tariff Update Application...is limited in scope and apart from a clarification on the interpretation of billing methodology language, only seeks changes to the treatment of Net Excess Generation (NEG) during a Billing Period and with regard to any annual payout of accumulated NEG. The program as it is currently structured was approved by Commission Order G9209, and the Company is not seeking to change its practice or program elements that have previously been examined and approved as part of the previous regulatory process except as described in the Application " (BCUC 1.3.2).

FortisBC currently states on its website that it:

"...has defined net metering as the metering and billing practice that allows for the flow of electricity both to and from a customer through a bidirectional meter. Residential and commercial customers can offset part or all of their own electrical requirements up to 50kW through generating their own clean energy and selling it back to FortisBC. FortisBC will credit customers for net energy they produce at their existing retail rate" (<https://www.fortisbc.com/Electricity/CustomerService/NetMeteringProgram/Pages/default.aspx>).

When I enrolled in this net metering program I understood "electrical requirements" to include payment of the Basic Charge, GST and any other nonconsumptive charges. And in fact, when questioned in the original application hearing in 2009, FortisBC was asked by the Commission if NEG credits could be "...applied against late payment and other nonconsumption customer charges", to which the Company responded:

"Billed NEG credits will be applied to the total outstanding account balance which could include both consumption and nonconsumption charges" (Net Metering Tariff Application Project No. 3698552, BCUC 1.6.1, 2009).

While FortisBC does not state it specifically in its application, they are proposing to eliminate the allowing of retail NEG credits to be used to offset the Basic Charge, the GST and other nonconsumptive charges, which they promised the Commission they would allow when they sought an Order to initiate their net metering program. I append, for the Commission's information, the analysis done by FortisBC on how my annual billing will be altered if you approve the changes to the tariff that FortisBC is asking for.

By eliminating the Basic Charge and other nonconsumptive charges as a retail NEG credit, my annual bill rises from \$91.22 to \$139.36: a 52.8% increase in what I will pay FortisBC.

Further, when I enrolled in this net metering program I was advised by FortisBC that they would pay me the retail rate for any Net Energy Generation over and above my household needs. Now after I have sized, built and paid for my system, and am wholly responsible for maintaining it, FortisBC is proposing to cut the payment from the Tier 1 rate of 9.845 cents and Tier 2 rate of 15.198 cents to 4.303 cents per kWh. In any commercial situation this proposal would be regarded as a breach of contract between the parties.

In effect what FortisBC is proposing to do is to buy my excess power when I do not need it at an amount 56.3% to 71.7% less than what they want me to pay for it when I want to buy it back. This hardly seems like a fair and reasonable proposal when you consider that the average price that FortisBC expects its residential customers to pay for electrical power (Tier 1, Tier 2 and the Basic Charge) is 13.48 cents per kWh 313% higher than what they are prepared to pay me (Shadrack 1.20.a).

Having spent \$30,000 in capital building my system and now taking all the responsibility to maintain it, however FortisBC wants to make a whopping 9.177 cents per kWh profit from reselling the power they buy from me for which they have no costs before they resell it to other customers and/or back to me. I urge the Commission to deny FortisBC their application and leave the program the way they promised they intended to run it when they first sought approval from the

Commission in 2009.

Yours Sincerely

Philip Trotter & Michelle Poulin

Customer: Trotter		Meter Read Date		June-17-15		August-17-15		October-15-15		December-16-15		February-15-16		April-19-15	
				kWh	Dollars	kWh	Dollars	kWh	Dollars	kWh	Dollars	kWh	Dollars	kWh	Dollars
Meter Data	Customer Usage														
	Delivered (by FortisBC)	595		447		802		2,409		3,135		1,915			
	Received (by FortisBC)	2,864		2,697		1,893		837		310		1,972			

Existing Billing Methodology	Billing Under Current Method														
	Delivered Power														
	Billed at Tier 1 Rate	595	58.58	447	44.01	802	78.96	1,600	157.52	1,600	157.52	1,600	157.52		
	Billed at Tier 2 Rate	-	-	-	-	-	-	809	123	1,535	233	315	48		
	Received Power														
	Credited at Tier 1 Rate	1,600	-157.52	1,600	-157.52	1,600	-157.52	837	-82.40	310	-30.52	1,600	-157.52		
	Credited at Tier 2 Rate	1,264	-192	1,097	-167	293	-45	-	-	-	-	372	-57		
	Total Energy Portion of Bill		-291.04		-280.23		-123.09		198.07		360.29		-8.66		
	Customer Charge		31.23		31.23		31.23		31.23		31.23		31.23		
	GST (5% on total Bill if +)		0.00		0.00		0.00		15.59		21.10		11.83		
	Total Bill		-259.81		-249.00		-91.86		244.88		412.62		34.40		
	Total Annual Bill	\$	91.22												

Proposed Billing Methodology	Billing Under Proposed Method														
	Net Delivered Power		-2269		-2250		-1091		1572		2825		-57		
	kWh Bank														
	Opening Balance	0		2269		4519		5610		4038		1213			
	kWh Withdrawl or Deposit	2269		2250		1091		-1572		-2825		57			
	Closing Balance	2269		4519		5610		4038		1213		1270			
	Billed kWh		0		0		0		0		0		0		
	Billed at Tier 1 Rate	-	0.00	-	0.00	-	0.00	-	0.00	-	0.00	-	0.00		
	Billed at Tier 2 Rate	-	-	-	-	-	-	-	-	-	-	-	-		
	Total Energy Portion of Bill		0.00		0.00		0.00		0.00		0.00		0.00		
	Customer Charge		31.23		31.23		31.23		31.23		31.23		31.23		
	GST (5%)		1.56		1.56		1.56		1.56		1.56		1.56		
	Total Bill		32.79		32.79		32.79		32.79		32.79		32.79		
	kWh Bank Payout	\$	57.38												
	Net Annual Bill	\$	139.36												

Billing Comparison

	Current Billing	Proposed Billing
Total Pre-Tax Charges	42.70	187.38
Total Tax	48.52	9.36
Total Annual Bill	91.22	139.36
Total kWh's billed at Tier 1	-903	-
Total kWh's billed at Tier 2	-367	-
Net Consumption (Generation)	(1,270)	