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: BC Hydro Utility Report

Are you currently registered as an intervener or interested party? *[Yes / No]*
no

Name (first and last): Ronald Provan	
City: [redacted]	Province: BC
Email: [redacted]	Phone: [redacted]

The BC Utilities Commission is authorized to collect and publish a person or organization's personal information when they participate in a matter before the Commission under sections 26(c) and 33.1(r)(ii) and (iii) of the Freedom of Information and Protection of Privacy Act (FOIPPA). Subject to FOIPPA, all documents filed in respect to an application will be placed on the public record.

Letter of Comment

Name (first and last):Ron Provan	Date: 13 Oct. 2016

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.

[Please write your comments in this box]

Hello

This letter is in regard to BC Hydro's September 30, 2016 information submission to the BC Utilities Commission responding to five questions from the BCUC.

I am a layman, but I believe that the questions posed to BC Hydro were either poorly thought out or very cleverly contrived to ensure that no direct or incriminating answers were necessary. I would really like to believe that the former is the case and that errors are accountable.

The letter's Executive Summary reads in part: "The following is a **high level summary** of BC Hydro's findings for each of the five questions." And
"Because there are **limitations in the data and assumptions made**", …. "the conclusions must be considered in **the context of the data available**".

BC Hydro is an enormous corporation with modern data collection, data analysis and data banking systems that for decades have traced every penny from every customer, and every watt of electricity produced and sold by them. Competence assures that there are no limitations or assumptions made.

Question 1: "Do the Residential Inclining Block rates cause cross-subsidy between customers with and without access to natural gas?"
Answer (in part): "Although the results show that under both approaches the revenue to cost ratio for customers **without access to natural gas is greater** than for customers with access to natural gas,"…."BC Hydro does not view this result as substantive given the **inherent limitations to the analysis"**.

I read the answer to the question as "YES it does cause cross-subsidy between customers". The question asked about customers, not about corporate revenue ratios. Let's do the math. Heat one house with electricity and another house with an alternate heat source. Which electricity bill will be higher? Let's ask BC Hydro.

Question 2: "What evidence is available about high bill impacts" …."on low income customers?"
Answer (in part): "Our data indicates that a majority of low income customers benefit from lower rates under the RIB rate structure" …."furthermore, the same data indicates that, if BC Hydro returned to a flat rate…."

Is this data the very same as the "limitations in the data and assumptions" from the summary?
Is this data based on a flat rate at the lowest step, the highest step, or somewhere in between?

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Question 3: "What evidence is available about factors that lead to high energy use and, therefore, bill impacts for customers without access to natural gas, including low income customers?"
Answer (in part): "The analysis of distributions between high energy use and non-high energy use customers demonstrates that *high use customers as a group*, regardless of income or access to natural gas, *have a higher proportion of factors that result in more intensive use of energy, relative to the non-high use group."*

"BC Hydro will be exploring potential voluntary rate options as part of Module 2 of the 2015 Rate Design Application (RDA). For example, offering a voluntary non-tiered time-of-use rate to residential customers may help high use energy customers mitigate some of the high bill impacts under the RIB rate."

It is pretty intense and brave to suggest that the high use group would use more energy than the non-high use group. I think I missed the part about the natural gas factor.

Module 2 of the RDA will **encourage ALL customers** to take advantage of the time-of-use rate to operate their appliances, machinery and gadgets at night, while they sleep, in their homes attached to a smart ~~bomb~~ meter. Sleep tight.

Sincerely

Ron Provan

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