

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: **Public input. Request for Comments. B.C. Utilities Commission. Deadline Nov.24**

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

Name (first and last): Barbara L. Mitchell	
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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): **Barbara L. Mitchell**

Date: **November 23/16**

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.

[Please write your comments in this box]

Re Tier 1 electricity rates, and the monthly ~ 1,350 kWh Tier 1 rate was set far too low.

My residential electrical bill was the reason for my writing to then-Minister Lekstrom as long ago as 2010.

Why?

Two reasons: no natural gas is available in this area (to this date) and, most importantly, my residence uses wood heat exclusively.

Electric heaters are never activated in my residence.

Yet hydro bills in 2010 (and following years during winter) showed Step 1 had been exceeded.

We are only two adults in the residence.

Imagine the impact on a family of, say, four who have neither natural gas nor wood heat.

Rationale for my 2010 letter to the Premier of B.C., forwarded to Minister Lekstrom—and today's Letter of Comment—I contend the BCUC, in determining the monthly kWh at which Tier 2 rates would "kick in"—used an entirely incorrect dataset.

I contend that Total kWh electrical usage in B.C. was tabulated, and the total number of utility accounts/residences determined that each residence used an average monthly amount of electricity of "x" amount.

To support my opinion, I offer that neither B.C. Hydro—nor BCUC—at the time, nor since, had canvassed the residential accounts (which are the only ones affected, as Commercial etc. has no tier process) to ascertain how many accounts use alternative heat sources: i.e. wood, natural gas, or alternative energy sources. So no "baseline all electric" was determined, which would have led to higher average monthly electrical usage and a resulting higher Tier 1 level before Tier 2 rates "kicked in".

As a result, the averaging of ALL residential account electrical usage, would have resulted in a spuriously-determined average because the process included alternative electrical sources!

To their credit, the State of California implemented a "baseline all electric" category (evidenced by supportable research, printed below).

Minister Lekstrom's reply? As additional historical info, I have a personal blog called *Coldstream Corner* on which I posted the following reply from the Minister:

"Blair Lekstrom, minister of energy, mines and petroleum resources replied thus:

...In your email, you express concern that B.C. Hydro's Residential Inclining Block (RIB) two-step conservation

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rate is unfair to ratepayers who cannot lower their electricity consumption by switching to other energy sources. The RIB rate was intended to encourage electricity conservation rather than fuel switching. [More information on the RIB rate.](#)

B.C. Hydro made an application to the British Columbia Utilities Commission (BCUC) for their proposed RIB rate. In response, the BCUC initiated an extensive review with public hearings that took place during the summer of 2008. Many public interest groups registered as interveners and represented ratepayer interests. A higher Step 1 threshold and concerns about bill impacts for residencees with electric heating were discussed. The BCUC considered all parties' arguments and the public interest, ordered revisions to the RIB rate, and instructed B.C. Hydro to put the BCUC revised RIB rate structure into effect. The BCUC's "[Reasons for Decision](#)" [document](#) detail the RIB rate application. **(Coldstream Corner note: It's 157 pages long!)**

The reply continues:

B.C. Hydro's electricity rates remain the lowest in North America. In June 2009, B.C. Hydro filed a report to the BCUC summarizing the results of a North American survey of electricity prices. The survey, conducted by Hydro Quebec and covering over 20 utilities across Canada and the United States, found that B.C. Hydro had the lowest rates for residential customers consuming 750 kilowatt hours or less per month and the third-lowest rates for residential customers consuming 1,000 to 3,000 kilowatt hours per month.

One way to lower your electricity bill is through investments in energy efficiency. **(Coldstream Corner note: now would be a good time to tell them we installed a 10 kilowatt wind turbine last year!)** British Columbia's 2010 budget includes \$35 million in new funding over three years for the "LiveSmart BC: Efficiency Incentive Program". The Ministry of Energy, Mines and Petroleum Resources is currently working with its utility partners to finalize the structure of the new Program. Details on the Program are expected to be announced in the coming weeks, and will be posted on the [LiveSmart BC website](#). **(Coldstream Corner note: would now be a good time to tell them that my 10 kilowatt wind turbine was INELIGIBLE for their program last year? seems the program only went to a maximum 3 kilowatt turbine, yet the website omitted that).**

You may also find lowcost actions to reduce your energy consumption and electricity bill through B.C. Hydro's [Power Smart program](#). **(Coldstream Corner note: oh yes, the B.C. Hydro "program" that charged me \$600.00 for a 10-minute inspection of the wind turbine components prior to start-up).**

I trust this information addresses your concerns. Thank you for writing. Sincerely," etc.

While not critical for this Letter of Comment submission, the balance of my blog story was as follows:

"Coldstream Corner's contention:

The Step 2 rate is not intended to--as Minister Lekstrom says--"encourage electricity conservation". Proof of that is B.C. Hydro's Fiscal 2011 **revenue requirement application**. They need "x-dollars" from utility consumers. More like *reverse accounting*!

And on [page 65](#) of that 157 page document, "BC Hydro stated that it has conducted research into the default residential rate designs offered by 88 different utilities throughout North America, Europe and Asia"... **Europe and Asia???** **Minister Lekstrom appears to think it was:** "results of a North American survey of electricity prices".

Also from the same page: "Tariff sheets were entered in evidence from California..." **California???** **That bastion of environment-first, and-to-hell-with-everything-else?** Yet, to California's credit, they have implemented a program that recognizes: 'an "All Electric" baseline allowance available upon application to those customers who have permanently installed electric space heating, or who have electric water heating and receive no energy from another source'. **California recognizes that! Did Minister Lekstrom realize B.C.**

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Hydro created a disparity when it *did not implement a baseline "all electric" allowance?*

Rather than go on ad nauseum, picking apart the documents item by item, it seems that this creative--and reverse--accounting system has spread to Coldstream Council. They also have a *revenue requirement* when considering property taxes. And those are going up 5.59%.”

...Additional information re Hydro's "conservation" rate changes are [here](#).”

My Letter of Comment is concluded.

Thank you for the opportunity to Comment.

Respectfully submitted,

Barbara L. Mitchell

