

# 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](mailto: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: Residential Inclining Block Rate Submission

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

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We are responding after reading the Fortis Gas submission to the BCUC on the Residential Inclining Block Rate submission, we did not read the BC Hydro response as it was not relevant to our situation. The key points that struck us were as follows:

1. There is evidence of a cross subsidy in effect. Residents who have no access to natural gas shouldn't be subsidizing those that do in the electricity rates they are paying; it is unfair. It is bad enough that they have to use more (as well as pay more for electricity) than others with more options, but to have the blended rate be more than what it costs for Fortis to serve them is doubly penalizing. (see 3.1.2)
2. Fortis claims they provide a "broad range of residential demand size management (DSM) programs targeting new and existing housing stock." This is an overstatement, we have an old house with a heat pump and double glazed windows. Other than some basic incentives for draft proofing and insulation under the Home Renovation program, there is nothing available to further mitigate the higher electricity costs for our situation. There are 2 programs that are income tested for which we are not eligible, 1 program for energy star appliances (which we have already), and 1 New Home program which we aren't eligible for. All other programs are for Natural Gas items which we can't use either. All of the electric rebate programs appear to end November 30, 2016 (with no mention of any follow-on programs). Perhaps "broad" to Fortis means they have at least 1 program for each customer group, but for an individual customer, the selection is quite limited and nothing to look forward to beyond November 30 2016.

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3. Fortis goes into a lot of statistical analyses on the different levers that influence electricity usage and base these on income, size of family etc., but they haven't made an attempt to estimate what might be a fair price for adequately running a home on electricity when there are no other options. The home we have in [REDACTED] is a second home and is not occupied all of the time; and while we set our thermostat to low when we are away, we still have periods of Tier 2 usage in the winter months. We have a home in Vancouver where we do have gas and 65% of our heating/living energy use is provided by gas. Nothing we do, by way of any of the other potential DSM programs noted in Fortis's summary, would get us anywhere near to making up for not having gas access in our Osoyoos home. If we lived in our Osoyoos home full time (which we plan to retire to), we would be reliant on electricity, particularly in the winter months, and we would not be keeping the heat at 5 degrees (C), minimally using appliances, TV's, or Computers or drying our clothes outside - it is just not feasible. It doesn't seem right that those with access can quite easily stay under the Tier 2 threshold without making any real effort to reduce electrical consumption when they have gas as an option whereas those without access can go over the threshold with quite basic needs.
4. The report indicates that the tier 2 pricing exceeds the level that leads to economically efficient purchase decisions on the part of customers (point 4 Executive summary) and doesn't offer any reasonable alternatives. Whatever model is put in place should encourage cost saving measures, but for people without access to gas, so they are limited in what they can do. The model should allow for this and equalize the playing field.

# Letter of Comment

Name (first and last):	Date:
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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]*

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