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Proceeding name: BC Hydro Amendment to Net Metering Service

Are you currently registered as an intervener or interested party: No

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Comment:

Please see attached letter.



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British Columbia Utilities Commission
Suite 410, 900 Howe Street
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re: Application to Amend Net Metering Service under Rate Schedule (RS) 1289

As an installer that has participated in the net-metering program for thirteen years I believe that the BCUC should reject the submission from BC Hydro and the proposed intern changes for the following reasons:

- In arguing for the "immediate limited amendments" the applicant states that "...only a small number of customers will be affected by these proposed amendments." However, based on our experience the vast majority of applications submitted over the last few months have been rejected by BC Hydro. All of these applications are for small PV systems that would generate less than the average for a detached single family home in BC (they are all 12 kW or less in a program that allows up to 100 kW).

The applications will likely eventually be accepted but BC Hydro is demanding a list of additional documentation that was not previously required. We believe that these requirements are onerous, unnecessary and create an unexpected financial burden on customers and installers.

- The application does not specify a clear set of criteria for net-metering systems installed on new construction where there is not a full year of consumption data. As a minimum the submission should be re-written with a clear set of criteria for circumstances where there is not a full year of data available. For example any system that generates less than the average household consumption in BC could be approved without additional documentation. As well BC Hydro could set a minimum system size for new construction that would not require additional documentation (eg. 10kW)
- In Zone 2 net-metering helps reduce the cost of the power that is subsidized by BC Hydro rate payers and significantly reduces GHG emissions from fossil fuel generators. Restricting or ending the program would remove this benefit for rate payers and prevent further reductions in GHG emissions.

The application should be rewritten to account for the cost difference in other forms of generation in Zone 1 and Zone 2.

- The application does not allow customers to size systems to accommodate future increases in consumption. This is likely to be significant issue as electrical vehicle (EV) adoptoin increases. The application should be re-written to allow a buffer above previous consumption level (eg. 25%)
- As it is written the submission will not allow certain green building certifications to be achieved in BC. For example the Living Building standard, the Passive House Plus and the Passive House Premium standards would not be permitted. BC is quickly becoming a leader in green building

certification and these changes would have a negative impact on that industry. Again, the application could be re-written with a buffer amount that would allow these certifications.

In addition to these reasons for rejecting the current intern changes we felt that any restrictions to the net metering program should be rejected for the following reasons:

- The amount paid for annual excess net-metering is relatively modest at \$0.099 / kWh. This is less than it would cost for many other forms of new generation (maybe even less than site C).

If BC Hydro resells this to the net-metering customer's neighbours at the second tier residential rate they have a profit margin of 40%. They would also make a profit selling this power to SGS Commercial customers.

- Rather than reducing the amount of green energy on the grid BChydro should be encouraging more. Excess storage capacity behind the dams means we could be exporting more to Alberta and the US (once we remove transmission constraints) and helping shut down dirty power plants.
- Researchers with the Pacific Institute for Climate Solutions [2060 Energy Future Pathways](#) team found that a photovoltaic (PV) penetration of 8.5% in BC would provide a good balance on the grid and not interfere with BC Hydro's minimum generation requirements. Currently penetration is less than 1% so there is plenty of room to grow without causing any technical problems for BC's grid.
- As we electrify transportation and building heating to meet climate targets there will be need for new generation and solar PV is one of the cleanest sources.
- Although BC's grid is relatively clean, data from NRCAN shows that for every kWh of PV added it would reduce GHG emissions by 16 kg.
- With more PV on the grid BC Hydro would also be able to sell more power to California as part of its renewable portfolio standard. Some of BC's hydro power does not qualify under this program.
- If someone installs a PV system that is close to net zero they no longer have an incentive to conserve energy the amount paid for excess power is reduced or eliminated.
- Ending the net-metering program would devastate the solar industry in BC. There would still be some off-grid work but the vast majority of the work currently being done is grid-tie.

This would mean the loss of good-paying jobs that keep workers in local communities.

- If the net-metering program is ended BC would become the only jurisdiction in Canada to not allow grid-connected solar power.

Thank you,



Rob Baxter