

From: LOUWERSE [REDACTED]
Sent: Monday, November 19, 2018 11:51 AM
To: Commission Secretary BCUC:EX
Cc: BC Hydro, Regulatory Grp; william.harper4@sympatico.ca; bharper@econanalysis.ca; thackney@shaw.ca; wjandrews@shaw.ca; support@bcpiac.com; lworth@bcpiac.com; eredmond@synex.com; ewerner@chfour.ca; zxxlos@gmail.com; matt@ardcorp.ca
Subject: Re: BCH RS 1289 Net Metering EXT REQ - Review and Compliance with Exhibit A-2
Attachments: second letter of objection.pdf

commission.secretary@bcuc.com

Dear Commission Secretary

RE BC Hydro 2014 Application to Amend RS 1289 for Net Metering Service

Please accept this email as my submission of comments and objection to the application to delay the review of the Application to Amend RS 1289 for Net Metering Service. I have attached this to the email. Please advise me, that you have been able to open the attachment with all the formatting in place (it appears that many of the submissions so far have been published without the formatting, making the submissions of objection incomprehensible, and yet BC Hydro submissions in full without any formatting omissions).

Yours sincerely

peter Louwerse

BC Hydro

Extension Request to File the Net Metering Service under Rate Schedule 1289 Application

As directed by Exhibit A-2, BC Hydro provides:

Documents:

Exhibit B-1 – BC Hydro Application to Amend Net Metering Service under Rate Schedule 1289 Compliance with Commission Order No. G-100-18 Directive 4 Extension Request – October 10, 2018

Exhibit A-2 – BCUC Request for Comments regarding the Application – November 13, 2018

[LINK TO BCUC WEBSITE](#)

You are receiving this email for information only. If you no longer wish to receive emails regarding this matter or if you feel there are others who should receive these emails going forward, please notify bchydroregulatorygroup@bchydro.com.

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Regulatory Compliance & Filings
BC Hydro
bhydroregulatorygroup@bhydro.com

Smart about power in all we do.

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**The Commission Secretary
British Columbia Utilities Commission
Suite 410, 900 HOWE Street
Vancouver, BC V6Z 2N3
16 November 2018**

bchydroregulatorygroup@bchydro.com

**Regulatory Compliance & Filings
BC Hydro**

RE: BC Hydro

**Extension Request to File the Net Metering Service under Rate Schedule
1289 Application**

Please accept this submission as comments, and objection to the above mentioned application to further delay the decision on the original application to terminate the core of an existing “net metering” program (as seen in other countries) which was designed to promote small scale sustainable none fossil fueled electricity in BC.

Overview

On or about Mid April 2018, BC Hydro, filed to end an existing program of permitting residents, businesses and farmers, to sell surplus energy from solar generated power systems. Rather than apply for this termination whilst the program was underway, BC Hydro has pre-empted this application by halting all applications with this intent.

In order to achieve this, there has been no obvious substantiation in either the application or in a need to halt this program temporarily whilst the application is being processed. (Halting all applications whilst the decision is being taken would imply some emergency if this was allowed to continue; where maybe there is such a huge demand that we may well be over run with residents producing surplus power; no such thing). There is no emergency and so no reason to temporarily stop all applications for permits to generate solar power for feeding back into the BC Hydro supply.

Given that there has been no substantiation for the initial application to end net metering of surplus power produced, (ie no substantiation for the halting of the program permitting surplus power to be net metered back to BC Hydro), and no substantiation as to why this present application to delay the first application (the reasons given by BC Hydro are not substantiated) these comments form the objection to the application. It has now been over 7 months since the program was jeopardized by the initial application to end the program as it was set out.

In this submission of comments:

firstly that the apparent reasons for this application to delay the review is not substantiated and indeed based on heresy and no evidence. BC Hydro has not substantiated (1) their claim that the delays in processing applications for electricity production has not effected applications, and (2) on the relevance of the Governments' energy Phase 1 study document to their application.

Secondly and finally; on the assumption and the predisposition that BC Hydro is obliged, by their privileged position of being the "Monopoly Holder of power sales" and distribution for BC, is not in the position to decide, apply or determine, whether a resident, business or farmer is permitted to produce and sell surplus power to the holder of the monopoly. This option is not available for BC Hydro, this monopoly situation comes with the obligation to purchase hydro produced by others in BC. Or relinquish the monopoly. This is part of the structure of the power supply of British Columbia. Hence, the conclusion is that BC Hydro is not qualified to apply to delay this decision with more delays.

In summary,; and BC Hydro has not established any Right to prevent residents of BC the ability to produce and sell electricity.

Submissions|

There are a number of core issues at stake and which have been overlooked in the attempt to accommodate this application:

1. BC Hydro claims that the delay in the decision of this application has had no adverse effect is unfounded and pure conjecture. There simply is no way of determining how many people have just not been permitted to apply for a permit on the grounds that they intend to become a small supplier and not just a net user (BC Hydro has stated that they are not accepting applications while this application process is in progress). BC Hydro has removed from the website the application link and form for such applications!

Since the inception of the Net Metering Program, BC Hydro has been a tardy permit processor, and indeed made it bureaucratically barely impossible and slow in its approval. This recently has been remedied and so more home owners and businesses are inclined to apply. We see today, a greater awareness and feasibility for solar power generation. This is reflected in the increase in permit applications. In theory every house could and should (given the drive to be zero carbon footprint) install solar power and ideally install an excess of production equipment (solar panels etc), to provide power for those who do not have the situation to allow this.

2. The Government's review Phase 1, has little to no bearing on the net metering program as claimed. There are no figures as to how much power is possible if homeowners, farmers and business were permitted to invest and produce power (note also : at their own capital cost, not the tax payers or BC Hydro's). Indeed, if the net metering program had been allowed to continue, permitting surplus power production, while this process is continuing there may be some figures available indicating the extent of the possible power production by residences and businesses. This claim that this delay has no real effect, as such has no basis as this has not had a run time to evaluate this.

3. BC Hydro enjoys the present Monopoly of the production and sale of Electricity.
It should be the Right of every resident and business to produce and sell what they produce. In this situation the production is electricity. However BC Hydro has this privilege and as such prevents others from producing and selling power. In return for this position, it would seem, BC Hydro must purchase the power produced by the residents of BC. BC Hydro has been keen to point out that there is a shortage of power coming up and hence the Site C dam project. BC Hydro is also keen to charge this project to the BC Consumer, and anticipates rate increases to fund this project. The issue is, does BC Hydro have the Right to prevent the sale of electricity by other producers if it does not agree to buy the electricity from these same producers? This fundamental issue needs to be established before either the first April 2018 application and this present application is addressed. This has not happened.

4. Currently BC Hydro appears to have the business model of large scale centralized power production. As the more "green energy" systems become more available, and in small scales, then local and de-central power generation is going to be more commonplace. The change is on the horizon. The premise of the application to delay this review is that a centralized model is applicable; this is not so, and as such the application is not valid. (it is worth noting that The Net Metering program is the first apparent indication that BC Hydro has to start evaluating the separation of its Transmission Business with its Power Generation Business.). It is becoming apparent that role of the |BCUC is now expanding to assess the very structure of the power supply and sale system for British Columbia. This is a large process and cannot be used to delay the development of small scale power production in BC.

5. Production of electricity is potentially a new resource for many Rural areas, and this delay in processing applications for small scale solar power production is effecting this economic development.