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BCUC File 59284
Batch 59206

November 21, 2018

Mr. Patrick Wruck, Commission Secretary
BC Utilities Commission
900 Howe Street, Suite 401
Vancouver, BC V6Z 2N3

Dear Commission Secretary,

On behalf of the Salish Sea Renewable Energy Coop (SSREC) I am submitting comments on **BC Hydro Extension Request to File Net Metering RS1289 Application**.

Our recommendation is to reject BC Hydro's application and proceed to a public review of the net metering program.

As mentioned in our previous comments (E-16), our cooperative has been researching renewable energy trends for the past five years and accumulated considerable expertise during that time. Almost fifty of our members are taking part in BC Hydro's net metering program and we would be pleased to share our expertise with BCUC and BC Hydro to help modernize and improve the net metering environment in BC.

Considering the obvious damage already done by BC Hydro's original application to individuals interested in going solar and considering the confusion seeded about the future of the net metering program in general, extending an ill-conceived interim decision would be providing the wrong message to the taxpayers and ratepayers of BC alike.

Sincerely,

A handwritten signature in black ink, appearing to read "Dr. T. Mommsen", written over a horizontal line.

Dr. Thomas Mommsen
Director



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To: BC Utilities Commission

Prepared by: Dr. Thomas Mommsen

On behalf of: Salish Sea Renewable Energy Co-op

Contact: [REDACTED]; 604 367-7127

Comments to BCUC Re: BC Hydro Extension Request to File Net Metering Service under RS1289 Application

Summary

Thank you for the opportunity to respond to **BC Hydro's Extension Request**.

We implore you to reject this request outright.

The extension request simply delays a badly needed, thorough and public review of the Net Metering Program and continues to exert its chilling and confusing effects on citizens interested in going solar.

In their decision in May 2018, the BCUC clearly stated Dec. 15 as the deadline for BC Hydro's submission of NM review. We think that half a year of internal review, with no public or external review is sufficient. The need is now for an independent review of the Net Metering Program with input from many knowledgeable people, including net-metered customers, who could help create a better, modern program in line with other utilities in Canada, U.S. and internationally that meets the needs of all parties involved.

The time has come for a complete, third party review of the NM program

As is obvious from our previous comments to the BC Utilities Commission (BCUC – Order G-100-18 E-16), our renewable energy cooperative was opposed to BC Hydro's application to limit net metering to self-consumption, even though, none of our members are over-producing. Our most salient objection concerned the lack of rigorous analysis and unwillingness to embrace and adapt the program to 2018 realities. BC is falling behind the rest of Canada, North America and the world in adoption and support for solar energy – now by far the least expensive and most efficient form of electricity production. With BC Hydro's unwillingness to adopt solar as part of the

electricity mix BC is also forfeiting the employment and many economic benefits that go with residential and community solar. An open, independent assessment of the program is tantamount, taking into consideration the needs of the solar community, the solar industry and climate change mitigation. The process should be entirely evidence based and embrace the latest information and rely on public, expert and user input.

The previous process for commenting was flawed

Although we appreciate the opportunity to submit further comments, the process is somewhat tainted by the fact that interested parties were told in May by the commission about the absence of a specific deadline for comment and that no public hearing had been established yet. The opportunity now extended to the 18 original commenters, including our cooperative, appears arbitrary and the BCUC should make a full public call for comments about the extension request with the appropriate advertising. Because the extremely tight timeline in May had been conveyed to some but not all people contacting the BCUC, the BCUC received only 18 comments from interested parties. Further, the BCUC made its decision without proper review of the thoughtful and detailed comments submitted by those 18 parties that all pointed out the many factual, mathematical, and conceptual weaknesses in BC Hydro's application. What was (and is) needed are better quality reports, honest data presentation and complete transparency by BC Hydro. It was impossible to judge the merits of the original application from the poor quality and obfuscating application.

BCUC assured us that there would be a full public process in December 2019. If we are now to wait a year for a public process then the previous interim decision should be reversed and BC Hydro should be required to resubmit, with a four-week (or less) deadline for a proper review by the BCUC. In its next application, BC Hydro should be required to respond to the comments already submitted, these comments must be open to public review and must include a wide range of stakeholders in its review process. There are many knowledgeable people in this province and elsewhere who could help shape a more informed and improved NM program. It is obvious that the expertise does not lie within BC Hydro. Who could possibly base a business in a field where the goalposts are moved unilaterally by one participant?

Delay, delay, delay

Delay seems to be a part of BC Hydro's overall strategy, that among other things, delivered suspensions of the SOP and micro-SOP initiatives. This delaying tactic clearly discourages communities to even think about community solar, creates confusion in the public and perpetuates incredible uncertainty in the burgeoning solar industry.

Also, we not think that the requested delay pending the general review of BC Hydro by the government would serve any specific purpose. The BCUC has an obligation to let customers have their say in the disputed issue whether it's convenient to the government and utility or not.

NM in need of review

BC Hydro makes it sound as if NM is extremely complex and requires 13 months of internal review – which it does not, although we can all agree that BC Hydro's NM program is overdue for a review. Other jurisdictions provide a wealth of information to draw on. However, BC Hydro has

made absolutely no overtures to obtain input from the 18 individuals/groups who submitted review comments for the first application. The parameters of a full review of the net metering program must include Community (virtual) Net Metering (CNM). If BC Hydro was really concerned about equity they would embrace CNM. CNM has been put into action by utilities all over the world and provides a simple mechanism for renters, strata, social housing, people with shaded houses etc. to play their part in decarbonizing their lives and participate in the solar revolution.

Absence of stakeholder input

The promised 'stakeholder' consultation and review is not happening either, since we understand that a meeting with industry was recently cancelled. NM customers who will have a vast experience with the NM program were never part of the review in the first place. It also seemed a little odd that the BCUC in their interim decision in May 2018 put the onus on commenters by stating *'Interested parties, those who provided letters of comment and stakeholders are encouraged to participate in BC Hydro's stakeholder consultation process as part of its broader review of the Net Metering Program in preparation for the future Net Metering application to be filed by December 15, 2018.'* Considering that many stakeholders will have jobs outside of their participation and interest in NM, it should have been made easy to join this 'stakeholder process'. Alas, nothing on the BC Hydro site would direct an interested party towards this process. For instance, BC Hydro has an email list of over 1500 NM customers that should be consulted to guide the future of this program.

Full independent review is required

In this process, how and where are the interests of British Columbians represented as taxpayers and as ratepayers? Where is the common good? In none of the correspondence around NM does BC Hydro mention climate change or climate change mitigation – instead relying on the myth (created by mega-hydro) that hydro is non-emitting. In the solar area, citizens are willing to put up their own monies to decarbonize, support local businesses and see the advantages of distributed generation. Alas, BC Hydro has steadfastly refused to consider community advantages in their own approach to NM and future projections.

There should be no extension. A proper hearing is imperative, where the parameters are wide open, considering national and international NM models that serve the public, the ratepayers and all stakeholders. BC Hydro again displays their odd relationship with data in their recent application for extension where they state (exhibit B-1, page 2) that *'it is important to note that interim approval of these amendments has not had a negative impact on program participation'*. As usual, no supporting data are presented; neither is any sort of data analysis. Our own experience clearly contradicts this statement (see below). BC Hydro has been sitting on their internal review of NM for over half a year and the corporation did not reach out to its stakeholders. The time has come to enforce BCUC's decision to go for full, public and independent review of the program.

Our cooperative's recent experience

In our comments submitted in May 2018, we had laid out numerous lines of evidence on why BC Hydro's application to limit net metering to self-consumption was ill conceived and should have been denied by the BC Utilities commission. We had supported our recommendation with a reanalysis of BC Hydro's own data that laid bare factual and mathematical errors, the absence of

negative effects on non-participating customers, the potential chilling effect on future NM customers and the general absence of evidence for a need of interim action.

Since then, our cooperative has contributed more than 10% of BC Hydro's 350 new NM customers in the last six months, and we can confirm that BC Hydro's application and the BCUC's interim decision have had a definite chilling and confusing effect of potential solar NM customers. Between end of May and July 2018, we have given solar presentations on the Southern Gulf Islands to over 300 people interested in 'going solar'. At each venue, the first questions were always about whether BC Hydro had abandoned NM altogether and confusion reigned about the fate of seasonal overproduction, resulting in pronounced hesitation to embrace solar and distributed generation. Obviously, commercial installers have experienced the same confusion, as evidenced by a whole page on the IPS (a solar company in Kelowna) website (<http://ipwr.net/bc-hydro-net-metering-2018/>) devoted to dispel the rumours around NM caused by the BC Hydro application.

Our cooperative has overseen the installation of 38 NM systems in the last six months and some of our directors have been involved in many other solar systems over the last three years, giving us ample of experience with net metering as well as off-grid systems. Although we contacted BC Hydro by phone to be considered as stakeholders in the review process, we have received no response from BC Hydro.

Areas of the NM program to be included in review

As mentioned in our previous comments to the BCUC, we are more than willing to cooperate with the BCUC and BC Hydro in a badly needed review of the NM program, concerning generation limits, timing of anniversary dates, separation of the program from run-of-the-river and wind generation, distributed generation, interconnection, solar farms, solar gardens, community net metering, tariffs and many related issues. However, we think BC citizens and ratepayers really deserve a high-level review process, discussion of net metering and distributed generation, independent of BC Hydro, that takes climate change, independent demand forecasts and many other factors into consideration. Our cooperative is ready to help. Making a recommendation on an ill-conceived extension to a poorly argued interim decision appears like a waste of time for all parties.