

Fred James

Chief Regulatory Officer

Phone: 604-623-4046

Fax: 604-623-4407

bchydroregulatorygroup@bchydro.com

December 19, 2018

Mr. Patrick Wruck
Commission Secretary and Manager
Regulatory Support
British Columbia Utilities Commission
Suite 410, 900 Howe Street
Vancouver, BC V6Z 2N3

Dear Mr. Wruck:

**RE: Project No. 1598976
British Columbia Utilities Commission (BCUC or Commission)
British Columbia Hydro and Power Authority (BC Hydro)
Extension Request to File Net Metering Service under Rate Schedule
(RS) 1289 Application
Reply Comments in Compliance with Exhibit A-4**

BC Hydro writes in response to stakeholder comments received regarding BC Hydro's response to BCUC Panel Information Request No. 1.

BC Hydro believes that an extension in the filing date of the next Net Metering Application to July 31, 2019 is appropriate in order to provide adequate time to engage stakeholders on the many issues relevant to the net metering program.

The reply comments from participants raise many significant issues that BC Hydro has also identified and which we touched on in our response to BCUC Panel Information Request No. 1. Those that need to be considered in any revision of our net metering program, include:

- increasing interest in electric vehicles, and charging them from BC Hydro's grid;
- Increasing interest of First Nations and other communities in solar energy and net metering;
- customers who wish to significantly over-generate;
- cost recovery for participating customers and BC Hydro;
- balancing the characteristics of solar supply with BC Hydro system requirements;
- treatment of changes in customer load from historical levels due to fuel switching or other reasons such as technology;

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- impacts of Phase 1 of the Comprehensive Review on the Standing Offer Program reference price for surplus energy;
- the need for a transparent review of the net metering program, with the opportunity for all stakeholders to participate;
- the alignment of the net metering program and tariff with the unique characteristics of solar supply; and
- the need to establish key principles of the net metering program going forward.

BC Hydro agrees that these are important issues and is concerned that a filing date of April 30, 2019 would not provide adequate time to engage on these issues and reflect the results of that engagement in the Application. Accordingly, BC Hydro believes that the extension request to July 31, 2019 should be granted.

For further information, please contact Chris Sandve at 604-974-4641 or by email at bchydroregulatorygroup@bchydro.com.

Yours sincerely,



Fred James
Chief Regulatory Officer

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