

Date Submitted: April 11, 2019

Proceeding name: Nelson Hydro 2019 Rural Rate Application

Are you currently registered as an intervener or interested party: Yes, Interested Party

Name (first and last): Norm Yanke

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Province: British Columbia

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Comment:

Nelson Hydro does not enforce its own Net Metering Bylaw. Nelson hydro loses income from power sales and credits excess IPP power at full retail. Power that isn't needed and out of sync with need. Ratepayers suffer this loss with higher rates.

2019 Nelson hydro rural rate increase

Nelson hydro [ignores their own bylaw](#)

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6.4 Net Metering

The bylaw states IPP

(solar) projects are ***limited to 25kW.***

Based on the ***economic benefit to Nelson hydro.***

\$900,000 has been released by the Columbia Basin Trust for Community alternate energy systems, they state there will be another release. I am concerned how much of this will show up in the Nelson hydro service area and ratepayers will be subsidizing these.

Last year grant money installed the following solar systems in Nelson hydro's service area.



Aerial view of the Balfour Golf Clubhouse with over 40kW of solar installed. This exceeds the bylaw 25kW maximum. But its deceptive.

Anyone looking at the [publicly available](#) on line solar data would think only 24.8kW is installed.

The data actually represents what 40kW would earn, very deceptive to anyone using this information to help them made a decision on solar economics.

The losing Alberta bid(only two bids were received both from Alberta) showed a system less than 25kW their proposal had the statement “in order to meet the Nelson hydro bylaw maximum of 25kW”

The Community Hall system is similarly DECEPTIVE

The [Balfour Community Hall on line public data](#)



Balfour community Hall with 60 305w solar panels = 18.3kW

On line it shows 12.4kW installed when 18.3kW is installed.

I am a retired electronics technologist supervisor. I have years of solar experience from a system with over 120 remote solar sites.

When I looked at the on line public data it made no sense, these systems were showing they were making far more power than they should. Upon a site visit it became clear.

The question one has to ask is why is this happening, a sales technique to gain more sales?

Regardless, this is public money, this should be corrected, nothing is being done.

Anyone using this data without knowing its erroneous will conclude solar has far more value.

I provided this information to the previous mayor and council, the General Manager of Nelson hydro. I repeated that with this new mayor and council recently elected (one councillor survived reelection). I have given this data to the Regional District, the Regional Director whose area received these systems.

I contacted the Alberta installation company,

At the recent public Nelson hydro budget meeting I approached the general manager of Nelson hydro who was standing with the Area director who received these systems.

Nelson hydro pays for any of their excess solar power. I asked the GM how much we were paying (I wasn't sure if it was a residential rate, or one of the many commercial rates).

The GM motioned to the Area director saying “ask her”. She had no idea. I had in my hand the printed Nelson hydro bylaw, I asked the GM about the oversized systems, he looked at what I was holding and acted as though he had never seen it before.

I had previously sent him all this information, this wasn't anything new.

At some point he put up his hand out toward me indicating the conversation was over.

Its unknown at this time how many solar systems the \$900,000 CBT grant money may put into the Nelson hydro service area.

Nelson has its share of solar systems installed with public money.

In 2009 the high school received a SolarBC grant for a system, we have years of data showing it had no economic value. I provided this to the Nelson hydro manager and his consultant when they announced the city was installing a community solar garden.

There was a private business with a solar system from grant money. The business and the solar system disappeared, one of the business principles is a city councillor.

He will not reveal what happened to the solar system bought with public grant money.

There is a solar system on the city skatepark washroom from public money. Installed facing trees so the sun barely shines on the solar panels. It was to provide lighting and hot water.

The washroom has a skylight, is closed in the evenings and I have read the meter, it hasn't made enough power for hot water to wash a mouse's foot.



Regional District also came up with another \$16,000 to replace the forever aluminum roof.

The material I read suggested after the site visit from the two Alberta solar companies bidding the information changed to the roof needing replacement. I mentioned this personally to the Area Director, she replied the roof needed to be replaced anyways.

Its my experienced opinion all the penetrations necessary to attach solar racking to a metal roof

creates a large risk of leaks. Roof systems are more amenable to attachment to an asphalt roof.

They replaced the roof with asphalt more amenable to solar attachments.

Regarding the bylaw mention

Rates paid for electricity will be subject to the approval of the Nelson Hydro General Manager and will be determined based on economic benefit to Nelson Hydro.

The project were required to show a **positive return** to

receive grant money. The calculations were done presuming Nelson hydro

paid full retail for their excess. The Pembina Institute of Alberta did the calculations arriving at a positive return for the 3 systems of +0.5%, -0.4% and +3.8%. Only by using their exaggerated annual power estimates and Nelson hydro allowing full retail credit for any excess solar sent to the grid.

What benefit is there to Nelson hydro giving full retail credit in the case of these community systems for anyone's excess solar?

Excess solar is made when we don't need power and Nelson hydro can make full nameplate 16MW power when water is available, spring runoff into fall.

They receive full retail credit when we don't need the power and are making our cheapest power.

Then they cash in this credit in winter when solar doesn't work.

And Nelson hydro generation is reduced to their licenced 9.1MW and buying expensive excess Fortis waterpower.

A similar deception happened with the Nelson Community Solar Garden, another comment I have submitted.