

**RAVENS
LANDING**

INDUSTRIAL PARK

PO Box 370
Sooke, BC V9Z 1G1

April 15, 2019

British Columbia Utilities Commission
Suite 410, 900 Howe Street
Vancouver, BC V6Z 2N3

Attention: Commission Secretary

**Re: Ravens Landing Industrial Park Ltd.
1763 Sean Heights, Saanichton, BC**

**Partial Relief / Exemption from Public Utility under *Utilities Commission Act (UCA)*
Part 3 Section 22 and Part 6 Sections 88(3) and 89**

To whom it may concern;

Please consider this as formal application for a partial exemption from Part 3, Section 22 from the *Utilities Commission Act (UCA)*, and consideration for partial relief per Part 6, Sections 88(3) and 89.

Background on Ravens Landing Industrial Park Ltd.

Ravens Landing Industrial Park Ltd. (RLIP), is a commercial/industrial strata park located in Saanichton, BC. The phased development consists of 3 buildings with 27 separate strata units serviced by two main BC Hydro meters - each strata unit has a separate sub-meter installed for accurate measurement and billing.

At present there are 18 rented units and 3 tenants. Due to the nature of the tenanted businesses (and the related capital costs of tenant infrastructure, equipment and need for long-term stable fixed costs), the lease terms are generally 5-year terms, but may exceed 5-years.

The remaining 9 units are owned by 5 other companies (one of the five is a related party to RLIP).

RLIP has contracted with Quadlogic Meters Canada Inc. to read the individual meters and prepare electrical invoices for our tenants and other owners. The billed rates have always adhered to the rates as set annually by *British Columbia Hydro and Power Authority Electric Tariff* Section 9.1.

Exemption Precedents

RLIP acknowledges it meets the definition of a public utility through the sale of electricity via 3rd party meters.

Referring to BCUC Order No G-191-16 the matter of providing a class exemption under certain lease conditions is being determined, or has now been finalized. For a certain class of tenants we would like this potential exemption to apply to our long-term leases that may exceed the 5-year rule.

Partial Relief – Part 6 Section 89

The challenge with this specific situation is the fact that there are some owned units that RLIP is selling electricity to that cannot be included in any potential class exemption granted by the BCUC.

The extent of the relief being sought is limited to excluding RLIP from the public hearing process with input from outside stakeholders and rate payers, and filing schedules with the BCUC.

Because we are a small public utility and are billing at the same approved tariff rates, it does not seem necessary for the BCUC to establish rates that would likely be the same, or to invite public non-affected parties to have a potential impact on how our business operates.

The annual public process would be onerous for our company, but we also feel it would not be the best use of time and resources for the BCUC and its' staff.

Protecting the Public

RLIP is a privately operated business with a small number of occupied units, one of many hundreds of registered electrical contractors listed with Measurement Canada in BC, a significant portion also likely to be considered Public Utilities.

RLIP has borne the cost of all of the metering infrastructure and ongoing maintenance costs, saving BC Hydro the installation, maintenance and billing costs of those 27 units.

It should also be noted that the strata units that sold early in the development and more recently, had legal representation during the contract negotiations, as well as licenced realtors. The purchasers would have had knowledge of the electrical billing at that time and should be considered informed.

RLIP fully supports the mechanisms within the *UCA* that affords the public a means to ask for compliance with Sections 25, 38, 41 and 42 and seeks no related exemptions.

We would like to have a meeting to better discuss the status of this file. Bill Patterson, President of RLIP would be pleased to come to Vancouver to discuss the details of this case in person.

Respectfully submitted,



Wm. Patterson
President,
Ravens Landing Industrial Park Ltd.