Date Submitted: June 13, 2019

Proceeding name: BC Hydro Net Metering Service Amendment Application

Participant contact information

Organization or individual name: City of Fort St. John

City: Fort St. John

Province: British Columbia

Email: VShopland@fortstjohn.ca

Phone number: 250-787-8162

For organizations only - representative contact information

Name: Victor Shopland

Organization (if different from above):

City: Fort St. John

Province: British Columbia

Email: VShopland@fortstjohn.ca

Phone number: 250-787-8162

Also representing (if applicable):

Additional information

Please state your reasons for intervening in this proceeding:
As the "Energetic City" the City of Fort St. John has long been committed to advancing a more energy resilient and vibrant community. As part of this commitment, in 2016 the City of Fort St. John constructed a 100-kilowatt micro-hydro power project under the Net Metering Program. Since becoming operational this project has brought many benefits to our community. More importantly this project has been showcased as a best in class example of how local

governments in British Columbia and beyond can directly contribute to a more sustainable energy future. We are confident that our project has inspired other communities to construct similar community-owned clean energy projects. The proposed changes to the Net Metering Rate Schedule 1289, in addition to the full suspension of the micro-Standing Offer Program eliminates the possibility for communities (Local and Indigenous governments) in British Columbia to contribute the stated clean energy, environmental and economic development goals stated in the CleanBC policy framework. Additionally, the City of Fort St John is extremely concerned about the proposed transitional Energy Price for existing Net Metering customers given the significant capital investment incurred to develop our micro-hydro project. The City is also concerned about the overall spirit and fairness of BC Hydro and BCUC potentially changing the regulatory regime and governing Rate Schedule of a project mid-way through its lifecycle. The proposed changes are likely to have material financial implications to the project and more broadly the City of Fort St. John.

Please state how you are directly or sufficiently affected by the Commission's decision in this matter; or describe your experience, information, or expertise relevant to this matter that would contribute to the Commission's decision making:
The City of Fort St. John is a leader in energy sustainability and clean energy development. This is directly demonstrated by the City's development of the micro-hydro project. The proposed changes to the Net Metering Rate Schedule 1289 represent a likely material impact to the overall business case of the micro-hydro project. More specifically, the City built the project in 2016 with a clear understanding of the Net Metering Rate Schedule and therefore made a capital investment of approximately $1.4 million dollars into the project. This capital investment and applicable benefits to the community remain dependent on the defined regulatory regime of the BCUC and existing Energy Price of $99.90 per megawatt hour outlined in the current Rate Schedule 1289. Furthermore, BC Hydro was in full support of the use of the Net Metering Rate Schedule during the project's approval process, and the City even had full support and endorsement for the project from BC Hydro's former CEO Jessica MacDonald. It is also important to note that in 2013 BC Hydro increased the Net Metering Rate Schedule from 50 kilowatts to 100 kilowatts in part to encourage the advancement of the City's micro-hydro project. The proposed changes outlined in BC Hydro's current "Application to Amend Rate Schedule (RS) 1289 for Net Metering Service", specifically those presented in Section 6, represent a fundamental change that will result in a material financial impacts to the City of Fort St. John. Given the lifecycle cost recovery and business model of a micro-hydro project like ours is typically contingent on a multi-decade period, the proposed changes are considered unfair and unreasonable.

Please list the key issues you intend to address in the proceeding:
The City of Fort St. John intends to address the proposed changes outlined in BC Hydro's "Application to Amend Rate Schedule (RS) 1289 for Net Metering Service" specifically those presented in Section 6. Specifically, the City has incurred a significant capital investment and that changing the basis of the Energy Price for surplus power is a significant and material change to the spirit of the program. As such, the City intends to intervene in the proceeding to share its overall concerns with the amendments to the Rate Schedule and more specifically the changes outlined in Section 6 of the application.

For administrative purposes only

Do you intend to participate fully, including attendance at hearings and submission of evidence or information requests, if applicable?: Yes

Do you intend to request PACA funding? This does not impact your ability to participate: No

Have you or your organization web-registered as an intervener or interested party in the past 12 months?: No

If yes, please provide your username: