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July 4, 2019

Sent via email/eFile

<b>RAVENS LANDING EXEMPTION APPLICATION</b>	<b>EXHIBIT A-4</b>
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Mr. Wm. Patterson  
President  
Ravens Landing Industrial Park Ltd.  
P.O. Box 370  
Sooke, BC V9Z 1G1  
[citta.sunriver@shaw.ca](mailto:citta.sunriver@shaw.ca)

**Re: Ravens Landing Industrial Park Ltd. – Application for an Exemption from Part 3 of the *Utilities Commission Act* – Project No. 1599010 – BCUC Information Request No. 1**

Dear Mr. Patterson:

Further to your April 15, 2019 filing of the above-noted application, please find enclosed British Columbia Utilities Commission Information Request No. 1. In accordance with the regulatory timetable established by Order G-133-19, please file your responses on or before Thursday, August 8, 2019.

Sincerely,

*Original signed by:*

Patrick Wruck  
Commission Secretary

/jo  
Enclosure



Ravens Landing Industrial Park Ltd.  
Application for an Exemption Pursuant to Section 88(3) of the *Utilities Commission Act*

**INFORMATION REQUEST NO. 1 TO RLIP**

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**1.0 Reference: APPLICATION  
Exhibit B-1, pp. 1–2  
Clarification of Requested Exemption**

Ravens Landing Industrial Park Ltd.'s (RLIP) Application for an Exemption Pursuant to Section 88(3) of the *Utilities Commission Act* (Application) on page 1 states:

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.

On page 2 RLIP states:

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.

- 1.1 Please confirm, or explain otherwise, that RLIP is seeking exemption from part 3 of the UCA pursuant to section **88(3)** [emphasis added] of the UCA.
- 1.2 Please confirm, or explain otherwise, that the requested exemption is for the entirety of part 3 of the UCA.
  - 1.2.1 If confirmed, please discuss why the exemption from all provisions of part 3 is requested.
  - 1.2.2 Please discuss what effect would exemption from part 3 of the UCA, with the exceptions of sections 24 and 25, have on the Application.
- 1.3 Please confirm, or explain otherwise, if RLIP is seeking relief or exemption from any provision of part 4 of the UCA.
  - 1.3.1 If confirmed, please discuss the relief or exemption sought.

**2.0 Reference: APPLICATION  
Exhibit B-1, pp. 1–2  
Strata Park Information**

RLIP's application on page 1 states:

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.

- 2.1 Please confirm the number of leases currently in place, including the lease term (i.e. over or under five years). Please also confirm how many occupants already own their units, and how many leaseholders may potentially become future owners of their units.
- 2.2 Please provide a list, in confidence, of all affected and potentially affected parties, such as current Lessees.
- 2.3 Please provide a sample of a lease agreement.

On page 2 RLIP states:

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.

- 2.4 Please provide a copy of the site plan and the electric single line diagram showing the electrical distribution to the occupant’s point of delivery, the location of the master meter(s), and the location of the sub meter(s).
  - 2.4.1 Does RLIP foresee a possibility of extending electric services beyond the current strata park? If yes, please provide further detail.

**3.0 Reference: APPLICATION  
Exhibit B-1, pp. 1–2  
Resale of Electricity**

RLIP’s application on page 1 states:

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

Section 9.1 of the British Columbia Hydro and Power Authority (BC Hydro) Electric Tariff<sup>1</sup> states:

**9.1 Resale of Electricity**

If a customer wishes to resell to a tenant of the Customer at the same Premises and on a metered basis Electricity provided by BC Hydro to the customer, the price for such Electricity will not exceed the price that BC Hydro would have charged had such tenant been a Customer of BC Hydro. This requirement will be included in an agreement for resale between BC Hydro and the Customer.

- 3.1 Please confirm, or explain otherwise, that RLIP currently owns all of the utility assets for the strata park.
- 3.2 Please provide the rate schedule number under which RLIP receives energy/power from BC Hydro.
- 3.3 Please provide samples of monthly bills showing full calculations for costs for the known (and potential) Lessees, including all Landlord costs where applicable.

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<sup>1</sup> [BC Hydro Electric Tariff](https://www.bchydro.com/content/dam/BCHydro/customer-portal/documents/corporate/tariff-filings/electric-tariff/bchydro-electric-tariff.pdf), page 9-1, retrieved from <https://www.bchydro.com/content/dam/BCHydro/customer-portal/documents/corporate/tariff-filings/electric-tariff/bchydro-electric-tariff.pdf>

- 3.4 Please explain if RLIP's proposed resale of electricity is in accordance with the BC Hydro Electric Tariff.
- 3.5 Please explain in detail how RLIP will ensure ongoing adherence to the BC Hydro Electric Tariff.
  - 3.5.1 Would RLIP be agreeable to some form of rate regulation, such as a rate cap?

**4.0 Reference: APPLICATION  
Exhibit B-1, pp. 1–2  
Complaint Handling Procedures**

Section 83 of the UCA states:

If a complaint is made to the commission, the commission has powers to determine whether a hearing or inquiry is to be had, and generally whether any action on its part is or is not to be taken.

- 4.1 In your opinion, please explain how RLIP's proposed exemption from part 3 of the UCA would limit the British Columbia Utilities Commission powers under section 83 of the UCA.
- 4.2 If an RLIP occupant had a complaint or dispute with RLIP, what civil remedies for resolution would be available to them?