

July 17, 2019

Information Request to BC Hydro and Power Authority (BC Hydro) from:

Brian Guy  
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with reference to:

Application to amend Rate Schedule 1289 for Net Metering Service (Project 1599004), submitted to the BC Utilities Commission (BCUC) by BC Hydro on April 29, 2019.

Introduction:

I am a new net metering customer. My application was approved effective April 3, 2019. I have a rooftop solar array with 60 PV panels (305 W each). With two 7.6 kW inverters, my maximum rate of generation is 15.2 kW. My system is slightly oversized to allow some buffer to accommodate a future electric vehicle charging port.

The issues and questions I have with respect to the above-noted application from BC Hydro have been addressed in Information Requests previously submitted by BCUC (Exhibit A-5), and other intervenors, particularly by CanSIA (Exhibit C7-2) and City of Fort St. John (Exhibit C17-2).

Many of the questions contained within other Information Requests have clearly been developed by individuals with deep expertise and knowledge of the B.C. energy system, and I expect they will receive correspondingly detailed, comprehensive answers. By contrast, as a layperson, my questions will be simpler, and I ask that answers be provided using clear, concise, unambiguous language.

The BC Hydro Application is referred to henceforth in this document as Exhibit B-1.

**Reference: Exhibit B-1, Section 1, re: effective date of the amended tariff:**

By Hydro has proposed that the Net Metering amendment, if approved, would take effect in April 2018, which is BEFORE the application was submitted.

I was not aware of BC Hydro's intention to apply to BCUC to modify its Net Metering Program until after I had completed an economic analysis and signed a contract with a solar PV installer in winter 2019. Any lowering of the price paid by BC Hydro for excess energy will negatively impact my economic outcomes. I believe it would be fair that I and others in my position be included in the "grandfather" group associated with this application. A fair effective date would be sometime AFTER the application is approved (if indeed it is approved), not a date BEFORE the application was submitted.

1. Please explain the rationale for choosing an effective date in April 2018, before the application was submitted.
2. Please provide an alternative date that follows submission of the application, with supporting rationale.

**Reference: Exhibit B-1, Section 4.4, re BC Hydro's survey of net metering customers:**

Figure 6 in Section 4.4 shows responses to a question in BC Hydro's survey of net metering customers, asking customers to choose between one of two options: (1) accept a reduced price or (2) lose any credit balances after 5 years. This is akin to choosing between "a rock and a hard place", and interpretation of the responses will be biased by the nature of the question.

1. Please explain why no additional alternatives were provided in the survey question.
2. BC Hydro has stated that it is seeking to improve fairness. Please explain how an expiry of a credit would be a fair option.

**Reference Exhibit B-1, Section 3.3, re: extended true-up period:**

BC Hydro is considering an extension to 24 months from the current 12 month true-up period. I welcome this additional flexibility. BC Hydro also references consideration of the potential for even longer true-up periods. Additional flexibility could be created if the carry-over period was extended beyond 24 months as is done in some jurisdictions. For example, individuals who have an early spring true-up date but leave B.C. in some winters could make use of an extended carry-over opportunity.

1. Please explain whether BC Hydro will consider extending the true-up period beyond 24 months to up to 36 months or longer.

**Reference: Exhibit B-1, Section 7.2, re Virtual Net Metering (VNM):**

BC Hydro proposes to defer consideration of Virtual Net Metering until a future date. However, I believe it should be considered as part of the present application process. The sharing of credits between meters would allow additional flexibility and reduce the annual payments from BC Hydro for excess energy. An interim step towards broader implementation of a VNM program could allow individual or corporate customers with more than one meter to transfer credits between their accounts. This could likely be accomplished by a fairly simple programming adjustment to the billing software.

I have a second BC Hydro account at another address and I would be happy to share any excess kWh generated by the solar array at my primary residence with my other account, rather than receive an annual payment from BC Hydro for any excess energy I might generate.

1. Please outline the process, time, and costs required to implement the interim Virtual Net Metering concept described above.

**Reference: Exhibit B-1, Section 4.2, re Price for Surplus Energy**

BC Hydro proposes to reduce the price paid to net metering customers for any excess energy that is generated. The rationale is based on an argument that I cannot follow involving the short-run and the long-run value of electricity.

1. Please explain clearly and concisely BC Hydro's belief that a kWh of energy acquired from a net metering generator should be treated differently than a kWh of energy acquired from other classes of electricity generators.