

July 17, 2019

VIA E-FILING

Patrick Wruck
Commission Secretary
BC Utilities Commission
6th Floor 900 Howe Street
Vancouver, BC V6Z 2N3



Reply to: Leigha Worth
ED@bcpiac.org
Ph: 604-687-3034
Our File: 7500.620

Dear Mr. Wruck,

**Re: British Columbia Hydro and Power Authority Application to Amend Net Metering Service under Rate Schedule 1289 ~ Project No. 1599004
BCOAPO Information Requests No. 1**

We represent the BC Old Age Pensioners' Organization, Active Support Against Poverty, Council of Senior Citizens' Organizations of BC, Disability Alliance BC, Tenant Resource and Advisory Centre, and Together Against Poverty Society, known collectively in regulatory processes as "BCOAPO et al." ("BCOAPO").

Enclosed please find the BCOAPO's Information Requests No. 1 with respect to the above-noted matter.

If you have any questions, please do not hesitate to contact the undersigned.

Sincerely,
BC PUBLIC INTEREST ADVOCACY CENTRE

Original on file signed by:

Leigha Worth
Executive Director | General Counsel

Encl.

REQUESTOR NAME: **BCOAPO**
INFORMATION REQUEST ROUND NO: **#1**
TO: **BRITISH COLUMBIA HYDRO & POWER
AUTHORITY**
DATE: **JULY 17, 2019**
PROJECT NO: **1599004**
APPLICATION NAME: **APPLICATION TO AMEND NET
METERING SERVICE UNDER RS 1289**

**1.0 Reference: Exhibit B-2, page 1 (lines 21-26)
Exhibit B-2, Appendix E, pages 1-2**

- 1.1 Who was invited to participate in the Webinar?
- 1.2 How were potentially interested stakeholders made aware that the webinar was taking place?
- 1.3 Who was invited to participate in the on-line survey?
- 1.4 How were potentially interested stakeholders made aware that the on-line survey was taking place?
- 1.5 How many of the survey respondents did not have a direct interest in net metering (i.e., they were not a current net metering customer, a pending net metering customer or a consultant/developer involved with net metering)?
- 1.6 Were any efforts made to specifically seek the input of customers or other parties that did not have a direct interest/stake in net metering (i.e., non-participating customers/stakeholders)?

2.0 Reference: Exhibit B-1, page 4 (lines 14-16) and page 15 (Table 3)

- 2.1 How many customers had “accepted” applications as of April 20, 2018?
- 2.2 Please provide a breakdown of the customers with “accepted” applications as of April 20, 2018 by nameplate capacity (i.e., similar to Table 3).

**3.0 Reference: Exhibit B-1, page 4 (line 22) to page 5 (line 2)
Exhibit B-1, Appendix B-Blacklined**

- 3.1 Throughout the application BC Hydro makes reference to the “proposed amendments” or the “amendments”. Please clarify whether the references to “proposed amendments” and “amendments” include: a) just the additional amendments BC Hydro is now proposing to the current RS 1289, approved on an interim basis June 1, 2018 as set out in Appendix B or b) also the amendments approved on an interim basis by the BCUC on June 1, 2018.

- 3.2 If the latter, please provide a blacklined version of RS 1289 showing all of the proposed amendments, including those approved on an interim basis in Order G-100-18.

4.0 Reference: Exhibit B-1, page 6 (lines 22-23)

- 4.1 Please confirm that “future applicants to the Program” are those who applied after April 20, 2018. If not, please explain who are considered “future applicants”.
- 4.2 The Application states that “the amendments would have no impact on existing customers in the program”. Will existing customers be affected by the amendments that: a) allow customers to choose their Anniversary Date; b) revise the price for excess energy or c) revise the Special Conditions portion of RS 1289 (per Appendix B-Blacklined, pages 13-17)?
- 4.2.1 If yes, please reconcile with the statement that existing customers will not be impacted.

**5.0 Reference: Exhibit B-1, page 14 (Table 2), page 15 (Table 3) and page 17, (Table 5)
Exhibit B-1, page 22 (lines 14-16)
Exhibit B-1, Appendix B-Blacklined, page 4**

- 5.1 Please provide a revised version of Table 2 with an additional column that indicates the percentage of F2018 surplus payments made to customers of each generation type.
- 5.2 Please provide a revised version of Table 3 with an additional column that indicates the percentage of F2018 surplus payments made to customers of each generation type.
- 5.3 Has BC Hydro considered that the part of reason for surplus payments is that factors used (per Appendix B) to determine the output of a customer’s proposed generation facility may be too low and not appropriate?
- 5.3.1 If not, why not?
- 5.4 Has BC Hydro undertaken any review or reassessment of the capacity factors assumed to be associated with various types of generation (per Appendix B)?
- 5.4.1 If not, why not?
- 5.4.2 If yes, what analysis has been undertaken and what are the results?

6.0 Reference: Exhibit B-1, page 22 (lines 14-16 and 22-24)

Preamble: The Application proposes to “Allow customers to size their Generating Facility to have an estimated Annual Energy Output up to 110 per cent of their estimated Annual Load”. The Application also proposes to “Exempt Generating Facilities with a capacity size of 5 kW or less from the requirement to have an estimated Annual Energy Output no greater than 110 per cent of the customer’s estimated Annual Load”

6.1 What is the basis for selecting 5 kW as the generating capacity size below which BC Hydro will not assess the Customer’s Annual Load or require a Customer to submit load data or load estimates in their Net Metering Application.

6.2 For each of the calendar years 2017 and 2018, please provide a schedule that breaks down, by generating facility size (using the same ranges as in Table 5), the amount of surplus energy (kWh) banked by RS 1289 customers.

**7.0 Reference: Exhibit B-1, page 31 (lines 19-23)
Exhibit B-1, Appendix B-Clean, page 5**

7.1 For each of the calendar years 2017 and 2018 please provide a schedule that sets out the amount of surplus energy banked by RS 1289 customers in each month of the year.

7.2 For 2018 please provide a schedule of monthly surplus energy broken down by generating facility size (using the same ranges as in Table 5).

7.3 If an existing RS 1289 customer who has already “chosen” an Anniversary Date installs addition generation, will that customer have a one-time option to revise the Anniversary date?

8.0 Reference: Exhibit B-1, pages 39-40

8.1 For each of the calendar years 2016-2018 please provide a schedule that sets out for each of the 12 months in the year, the daily average Mid-C price for the month converted to Canadian dollars using the average exchange rate from the Bank of Canada for the month.

8.2 Based on current tariffs and loss factors, what would be the impact of adjusting for line losses and wheeling charges on the Energy Price used for surplus payments?

**9.0 Reference: Exhibit B-1, page 43
Exhibit B-1, Appendix B-Clean, page 5**

9.1 Is the technical assessment referred to on page 43 of the Application (lines 3-10) the same as the site acceptance verification referred to in Appendix B?

9.1.1 If not, please explain what the difference is.

- 9.1.2 If not, is there a separate charge for the “technical assessment”? If so, what is it and if not, why not?
- 9.1.3 If yes, please reconcile the fact that: a) according to BC Hydro’s Terms and Conditions of the Electric Tariff the Net Metering Site Acceptance Verification Fee is only applicable to Generators Above 5 kW with b) the statement in the Application that “all Program applications received from customers in Non-Integrated Areas receive a technical review”. Does this mean that customers in NIA with generating capacity of less than 5 kW undergo a technical review but do not pay any fees for the review?

10.0 Reference: Exhibit B-1, page 44 (lines 17-20) and page 45 (lines 5-17)

- 10.1 Based on 2018 calendar year data, please provide a table that sets out the surplus payments received by RS 1289 customers as a percentage of their total bill annual charges from BC Hydro based on the Rate Schedule under which the customer receives Service from BC Hydro broken down by number of customers (e.g., Number of customer for which surplus payment represents 0-2% of their annual bill, 2-5% of annual bill, 5-10% of annual bill and > 10% of annual bill)
- 10.2 Overall, is it BC Hydro’s view that updating the Energy Price may have a material impact on the total amount an RS 1289 customer is required to pay BC Hydro taking into account the bill received based on the Rate Schedule under which the customer receives Service from BC Hydro? If yes, please explain why.
- 10.3 Has BC Hydro analyzed whether the amendments would impact the typical payback time for existing customers to recover their initial investment in distributed generation?
 - 10.3.1 If yes, please provide details.
 - 10.3.2 If not, why not?

11.0 Reference: Exhibit B-1, page 47

- 11.1 For rate design changes that will materially impact customers, BC Hydro has frequently phased-in the change over a number of years. Rather than maintain the Energy Price existing rate for 5 years and then decreasing it in “one step”, did BC Hydro consider phasing in the change over a number of years?
 - 11.1.1 If yes, please provide BC Hydro’s assessment as to why the proposed approach was considered preferable.
 - 11.1.2 If not, please comment on whether or not such an approach would be preferable.
- 11.2 Is it fair to say that most survey respondents who advocated maintaining the current Energy Price (as opposed to decreasing it) were RS 1289 customers?

**12.0 Reference: Exhibit B-1, page 50 (lines 9-12)
Exhibit B-1, Appendix F, pages 18 & 19 of 53**

- 12.1 Please update the Tables on pages 18 and 19 of Appendix F to include F2017 and F2018.
- 12.2 Please provide an assessment of the cost shifting between participating and non-participating customer based on the number of customers and cost for F2018. In doing so please take into account: a) the costs per part (1), b) the revenues received from verification fees, and c) the difference in the value of Surplus Energy based on 9.99 cents per kWh and the Mid-C price, adjusted for wheeling charges and losses.