

Date Submitted: September 11, 2019

Proceeding name: BCUC Municipal Energy Utilities Inquiry

Participant contact information

Organization or individual name: SSL-Sustainable Services Ltd.

City: Langford

Province: British Columbia

Email: lparkes@westhillslandcorp.com

Phone number: 2508123661

For organizations only - representative contact information

Name: Lisa Parkes

Organization (if different from above):

City: Langford

Province: British Columbia

Email: lparkes@westhillslandcorp.com

Phone number: 2508123661

Also representing (if applicable):

Additional information

Please state your reasons for intervening in this proceeding:

We are a company that provides district energy to residents of a particular area of the City of Langford (the "City") as a municipal service under the provisions of the Community Charter. BCUC recently determined that SSL is a "public utility," which means that we could be subject to double regulation - by the City under the applicable multi-utility bylaw and agreement between the City and SSL, and by BCUC under its TES Guidelines.

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:

See answer immediately above. It is not necessary nor reasonable for SSL to be regulated by both the City and BCUC with respect to the same subject matter. If some resolution is not reached, it is possible that SSL could be subject to regulation by BCUC on a particular issue, but also subject to regulation by the City on the same issue (perhaps with different requirements).

Please list the key issues you intend to address in the proceeding:

We intend to address the issues of both the necessity (or lack thereof) to have BCUC regulating utilities that are already being regulated by municipalities, and also the practical challenges of double regulation. We would also intend to set out the history of SSL, its rates, and its complaint history in the 8 years of its operations prior to BCUC determining that it should regulate SSL.

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: