

Date Submitted: September 13, 2019

Proceeding name: BC Hydro CCF Pilot – Year One Evaluation Report

Are you currently registered as an intervener or interested party: Yes, Interested Party

Name (first and last): larry kimura

City: bowser

Province: British Columbia

Email: [REDACTED]

Phone number: [REDACTED]

Comment:

I submit my letter of comment regarding the BC Hydro “Customer Crises Fund” (CCF). My contention with the BC Hydro CCF are the same as before only to be reinforced by the comments that I received from the BC Hydro response on August 10, 2019 and by all the hydro rate payer that I have spoken with since. BC Hydro states the fund was proposed by BC Old Age Pensioners Organization which differs from the BC Hydro press release that stated that it was BCUC’s idea. How does this group denote fair and meaningful representative public consultation for all the rest of the hydro rate payers? Not! BC Hydro goes further to say this group submitted that this program would decrease BC Hydro’s operating costs because they could spend less effort to obtain payment. But that is BC Hydro’s job to collect payment, not mine or other rate payers. Of course it reduces their operating costs because they get us to pay additionally to the fund to subsidize their operating costs directly into BC Hydro’s coffers by double dipping only the residential rate payers. And again BC Hydro stated that they engaged several focus groups to obtain input from customers. No one that I have spoken to nor any of those that managed to take the time to write to BC Hydro expressing their displeasure with the program after the implementation of the program were consulted either. BC Hydro’s submissions of public consultation is nothing but a poor deception. BC Hydro states because BCUC ordered the fund as a mandatory charge and calls it a “tariff” and it can’t be considered a charitable donation or a social assistance program. BCUC calls the fund a “rider”. A mandatory charitable donation called by any other name such as fund, rider, or tariff is still a charitable donation by the paying residential customers. I again submit the mission of the BCUC “is to insure that ratepayers receive safe, reliable and non-discriminatory energy services at fair rates from the utilities it regulates, and that shareholders of those utilities are afforded a reasonable opportunity to earn a fair return on their invested capital”. This does not give BCUC the authority under the BCUC Act to approve a charitable scheme that “discriminates” against the paying residential rate payers only and excluding all the business users of hydroelectricity. Furthermore, what right does BC Hydro or BCUC have to tell me who I should be charitable to. I decide who I wish to donate to or help, not BC Hydro. If the BC government wishes to create a charity for delinquent account holders that would be their choice at their own peril. At best it is unethical and irresponsible for BC Hydro and BCUC to regulate the donation of funds from paying residential customers to pay off delinquent account holders. This does not provide paying customers any additional utility services and therefore I believe this violates the BCUC Act to implement such fund. The language used by BC Hydro and BCUC is very clear and call the CCF a fund specifically targeting residential payers only. This is not a rider or

tariff. It's a fund and charitable fund at that! I further contend by BC Hydro's admission that they assigned 7 to 9 full time employees to administer this "small program". This cost in any business environment is unjustifiable for a program of this size. Also, the initial implementation cost of \$600,000 were ridiculously overstated. Since BCUC has reduced the fund rate by about 50% then I expect BC Hydro to reduce their full time employee count by 3 or 4 if not more. I conclude, • that BC Hydro totally failed to communicate or perform fair and representative public consultation with the majority of their hydro rate payers in British Columbia, • the creation of the fund is extremely discriminatory because it is only applied to residential rate payers and violates BCUC's mandate and possibly the BCUC Act, • BC Hydro grossly overinflated the administrative and implementation costs to misappropriate those costs from the fund, • BC Hydro nor BCUC should have the license to tell me who I should or should not be charitable to, • The BC government has failed to scrutinize the Crown agent, BCUC, and the Crown Corporation, BC Hydro, in the execution and implement of such a highly controversial program as the CCF as evidenced by all the negative feedback that BC Hydro has received either in writing or by telephone or on social media and chat rooms. I recommend, that BCUC either cancel the program or as a minimum give all rate payers the option of participating in the CCF or not. I'm certain that if you give the rate payers the option of opting in or opting out of paying the CCF you will then truly find what everyone thinks of your ill-advised program. Continuing with this program would only demonstrate corporate bullying by BCUC and BC Hydro against the residential rate payers. I trust that you will do the wise thing and consider my and others objections with continuing with the CCF.