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**Date Submitted:** September 13, 2019

**Proceeding name:** BCUC Municipal Energy Utilities Inquiry

## **Participant contact information**

**Organization or individual name:** Enerpro Systems Corp.

**City:** North Vancouver

**Province:** British Columbia

**Email:** sroka@enerprosystems.com

**Phone number:** 6049829155

## **For organizations only - representative contact information**

**Name:** Steven Roka

**Organization (if different from above):**

**City:**

**Province:** British Columbia

**Email:** sroka@enerprosystems.com

**Phone number:**

**Also representing (if applicable):**

## **Additional information**

**Please state your reasons for intervening in this proceeding:**

We have been involved with working with a large number of municipal utilities in the lower mainland and have had many positive and a few negative experiences. We would like to address the over stepping of boundaries by certain municipalities and monopolistic behavior which isn't in the best interest of customers.

**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:**

Enerpro is a energy submetering company with thousands of accounts on district energy owned by municipalities. In our opinion, we are the most in touch with end users as we deal directly with them vs. most municipalities that deal only with the building as a whole. Our experiences would provide significant value to the inquiry.

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

Enerpro has issues with municipal district energy systems that overstep their boundaries and use municipal powers to also dictate how buildings allocate their energy costs after the purchase of thermal energy. Landlords and strata buildings are governed by the Residential Tenancy Act as well as the Strata Property Act in how they allocate costs. When a municipality, such as the City of North Vancouver, comes in and forces a building to change this cost allocating, both the landlords and Strata's are put in a situation where they are forced to go against either municipal bylaws or provincial bylaws. When condos are sold they have in their disclosure statements how their energy costs will be allocated. These municipal bylaws go against the purchase agreements. Also, Enerpro finds that the use of 100% fixed costs for Hot water and/or thermal energy is counter productive to development and policy goals put out by the province and municipalities related to conservation. For fixed cost services like hot water in the City of North Vancouver, the developers are expected to follow expensive building code requirements for energy conservation, but the end users see zero benefit to them. The municipality forces developers to implement these measure and also takes 100% of the benefit by still charging the buildings the same amount regardless of how much they use. In fact, they may be penalized for reducing their consumption too much. A variable or mixed rate would bring these building back in line with conservation goals and allow the promotion of GHG reduction measures. Enerpro has been working with a large number of municipal district energy systems and for the most part have seen very good policies and rates that reduce conservation and the burden of energy costs to the end user. Forcing buildings to connect to a system had better offer value, either through reduced GHG's and/or better control and awareness over costs in a building.

## **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?:** Yes

**If yes, please provide your username:**