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British Columbia Utilities Commission
Suite 410, 900 Howe Street
Vancouver, BC, V6Z 2N3
Attn: Patrick Wruck, Commission Secretary
By Web Posting

Dear Sir:

Re: British Columbia Hydro and Power Authority Customer Crisis Fund (CCF) Pilot
Program – Year One Evaluation Report
BCUC Project No. 1599030
B.C. Sustainable Energy Association submissions on process

These are the intervener BCSEA's submissions on the appropriate review process, timing and scope of the CCF Pilot Program, in accordance with the regulatory timetable established by the Commission's August 22, 2019 Order G-195-19.¹

In brief, BCSEA's view is that the *CCF Year One Evaluation Report* achieves compliance with Order G-211-18 and no further regulatory steps are required or warranted. The Commission's Decision and Order G-166-17, that approved the three-year CEF Pilot Program, directs BC Hydro to file an evaluation report with the Commission within 90 days of the completion of the second year of the CEF Pilot. That evaluation schedule remains appropriate, in BCSEA's view.

Next, the Commission's three questions are set out in italics, followed by BCSEA's responses.

1. BC Hydro has stated on page 2 of the CCF Year One Evaluation Report the following:

With only one year of operation, BC Hydro is unable to conclusively identify if the CCF Pilot resulted in benefits (such as avoiding disconnection or reducing costs) to participants or other customers... BC Hydro expects that there will be a sufficient sample size available at the end of the second year of the CCF Pilot operations to provide more definitive conclusion as to the benefits achieved.

Considering the statement above, what is the appropriate timing for the review of the BC Hydro CCF Pilot Program?

BCSEA Response:

BCSEA respectfully submits that the BC Hydro CCF Pilot Program should be reviewed by the Commission following the Commission's receipt of BC Hydro's evaluation report that is due within 90 days of the end of the second year of the Pilot.

In BCSEA's view it would be premature to review the BC Hydro CCF Pilot Program at the present time. The *CCF Year One Evaluation Report* covers only the first year of a three-year pilot program. Due to the short period for which data was available the Report is unable to identify if the CCF has resulted in benefits to participants and other customers, as indicated in the

¹ Exhibit A-2

quote from BC Hydro provided by the Commission in the question above. Moreover, the purpose of the year-one evaluation is not to make a conclusion or recommendation regarding the viability of a permanent customer crisis fund.²

2. Given the information currently available in the CCF Year One Evaluation Report, what is the appropriate regulatory process for any review of the BC Hydro CCF Pilot Program?

BCSEA Response:

In BCSEA's view, it would be appropriate for the BCUC to acknowledge that its receipt of the *CCF Year One Evaluation Report* indicates BC Hydro's compliance with the direction set out in the Commission's November 8, 2018 Order G-211-18. Nothing further is required in relation to Order G-211-18, in BCSEA's submission.

3. What specific topics should be addressed as part of any review of the BC Hydro CCF Pilot Program?

BCSEA Response:

BCSEA respectfully submits that the specific topics for the review of the CCF Pilot Program should be determined when the review commences, which BCSEA says should be after the year-two evaluation report is received, as noted above. Having read the *CCF Year One Evaluation Report*, BCSEA consider it comprehensive and well executed. In BCSEA's view, there are no gaps that need to be identified before the year-two revaluation report is prepared. In the event that BC Hydro applies for permanent approval of the CCF, then BC Hydro's application would be expected to address not only the results of the Pilot Program to date but also the merits of making the CCF permanent. During the Commission's proceeding regarding the application, the Commission and interveners would have an opportunity to raise any additional topics they considered important.

All the above is respectfully submitted.

Yours truly,

William J. Andrews



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² Exhibit B-1, pdf p.15