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November 28, 2019

British Columbia Utilities Commission  
Suite 410, 900 Howe Street  
Vancouver, BC  
V6Z 2N3

Attention: Mr. Patrick Wruck, Commission Secretary and Manager, Regulatory Support

Dear Mr. Wruck:

**Re: British Columbia Hydro and Power Authority (BC Hydro) Customer Crisis Fund (CCF) Pilot Program – Year One Evaluation Report ~ Project No. 1599030**  
**FortisBC Energy Inc. and FortisBC Inc. (collectively FortisBC) Submission on Timing, Regulatory Process, and Scope**

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In accordance with British Columbia Utilities Commission (BCUC) Order G-195-19 regarding the review of BC Hydro's CCF Pilot Program Year One Evaluation Report (CCF Report), FortisBC writes to provide its submissions on the three questions the BCUC requested parties to address. The three items as discussed in the Appendix B of the Order G-195-19 are as follows:

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?

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?

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

FortisBC participated in the regulatory process resulting in BCUC Order G-166-17. FortisBC raised three main points in its submissions in that process<sup>1</sup> which were the fundamental concept or philosophy of such a fund, elements of program design, and the nature of the orders which would come from the process. FortisBC's position remains unchanged.

FortisBC prefaces its submission on the three questions posed by the BCUC that, depending on the BCUC's intended purpose for the CCF Report review process, FortisBC's responses will vary. For example, if the BCUC's purpose and intended scope of the CCF Report review process is to make fundamental determinations such as whether or not the CCF Pilot Program should continue, be modified, or should be terminated either earlier or at the end of the three-year pilot program; then the review of the CCF Report and any resulting assessment will necessarily need to be based on the limited data currently available.

However, if the BCUC concurs with BC Hydro's characterization of the CCF Report that it is not intended to be used to make conclusions or recommendations regarding the CCF Pilot Program and the purpose of the review process is solely to determine the costs and benefits of the CCF Pilot Program; then FortisBC does not object to BC Hydro's suggestion that a second year of data would be more informative.

Considering the number of unsolicited complaints filed by BC Hydro's residential customers from all over its service territory, it might be appropriate to consider whether the CCF Pilot Program should continue. The review of letters of complaint indicates that the majority of customers' concerns are not focused on the size of the CCF Pilot Program rider nor the cost and benefit analysis. Rather, customers' concerns are more fundamental in nature and relate to issues such as the voluntary payments versus mandatory payments (and the jurisdiction of the BCUC to impose what appears to be a tax), utility function versus government function and discrimination and unfairness in program's design and implementation.

Without clarity on the purpose of the CCF Report review, FortisBC does not take a position regarding timing and the specific regulatory process, and defers to the BCUC to make that determination. FortisBC does submit that any review process should consider ratepayers complaints and not be limited to cost and benefits analysis.

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<sup>1</sup> Reasons for Decision, Appendix A to Order G-166-17, page 2.

If further information is required, please contact the undersigned.

Sincerely,

**on behalf of FORTISBC**

***Original signed:***

Doug Slater

cc (email only): Registered Parties