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Environmental, Natural Resources &
Indigenous Law

VIA EFILE

November 28, 2019

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

Attention: Patrick Wruck, Commission Secretary

Dear Mr. Wruck,

**Re: British Columbia Hydro CCF Pilot – One Year Evaluation Report –
Order G-195-19**

We write in response to the BC Utilities Commission's Order G-195-19, issued on August 22, 2019. Specifically, we write to provide the Zone II Ratepayers' Group ("**Zone II RPG**")'s submissions in response to three questions raised in that Order, which are as follows:

- 1) What is the appropriate timing for the review of the BC Hydro CCF Pilot Program, considering BC Hydro's statement on page 2 of the CCF Year One Evaluation Report ("CCF Report")?
- 2) Given the information currently available in the CCF 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.

Zone II RPG's submissions on these issues are as follows, using the same numbering as above:

- 1) In our respectful submission, it is premature to review the CFF because the sample size is insufficient to reach any reliable conclusions on the program's effectiveness. Instead, Zone II RPG proposes that this review should follow the two-year trial, as per the BC Utilities Commissions' Directive 6 in Order No. G-166-17.

- 2) Please see our comments in (1) above. It would further be appropriate to acknowledge, in our submission, that the submission of the CCF Year One Evaluation Report indicates BC Hydro is in compliance with the direction set out in the Commission's November 8, 2018 Order G-211-18.

We note that BC Hydro has applied for an adjustment to the CCF Rate Rider from 0.82 cents per day to 0.43 cents per day, effective October 1, 2019. The BC Utilities Commission has approved this adjustment on an interim basis. Zone II RPG agrees it is appropriate to consider this change to the rider through a stream-lined (written) regulatory process.

- 3) Further consideration of the topics for review may be required closer to the review itself, when a complete record of pilot outcomes is available. As part of any future review of the CCF, Zone II RPG proposes that the BCUC review the CCF against the pilot objectives that were set out in the BCUC's directive when the program was initiated. If possible, a comparative analysis of the program's success also could be useful. Finally, the BCUC should consider whether it has jurisdiction to make the pilot permanent, and whether such an order should in fact be made.

Should you require anything further, please let us know.

Yours truly,
IRIS LEGAL


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