November 28, 2019

VIA E-FILING

Patrick Wruck
Commission Secretary
BC Utilities Commission
6th Floor 900 Howe Street
Vancouver, BC V6Z 2N3

BCPIAC
Public Interest Advocacy Centre
Reply to: Leigha Worth
ED@bcpiac.org
Ph: 604-687-3034
Our File: 7500.100

Dear Mr. Wruck,

Re: British Columbia Hydro and Power Authority Customer Crisis Fund (CCF) Pilot Program – Year One Evaluation Report ~ Project No. 1599030
BCOAPO submissions on timing, regulatory process, and scope

We represent the BC Old Age Pensioners' Organization, Active Support Against Poverty, Council of Senior Citizens' Organizations of BC, Disability Alliance BC, and Together Against Poverty Society, known collectively in regulatory processes as "BCOAPO et al." ("BCOAPO").

We provide this submission in accordance with the regulatory timetable established by Commission Order G-195-19 (Exhibit A-2) for submissions on the timing, regulatory process, and scope of the review of the BC Hydro CCF Pilot Program. Below are BCOAPO's responses to the Commission's questions:

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?

Response:

BCOAPO, similarly to BC Hydro and BCSEA, submits that the BC Hydro CCF Pilot Program should be reviewed following the submission of BC Hydro's evaluation report after the completion of the second year of the Pilot Program.

As noted in the Commission's Decision on BC Hydro's 2015 Rate Design Application, the original purpose of the CCF Pilot Program (as opposed to approving a permanent program) was to address the fact "there is insufficient information on the record in this proceeding to make a determination on the establishment of a crisis intervention fund on a permanent basis". In this regard, the type of information the BCUC was referring to was

information regarding the utility benefits from such a program on an economic or cost of service basis[1].

As stated in BC Hydro's submissions (Exhibit B-3) "[t]he economic justification of the Pilot involves examining the measurable financial benefits to ratepayers, such as a reduction in collection costs, bad debt expenses, or working capital requirements, balanced against the overall cost of the program." However, as noted by BC Hydro, with only one year of operation, BC Hydro is unable to conclusively identify if the CCF Pilot resulted in utility benefits justifiable on an economic basis.

BCOAPO strongly agrees with BC Hydro that, "the review of the Pilot Program should occur when there is sufficient data available to conduct a conclusive analysis of the economic impact of the 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?

   Response:

   BC Hydro filed its Year One Evaluation Report in compliance with Order No. G-211-18. BCOAPO agrees with BCSEA (Exhibit C1-2) that BC Hydro's CCF Year One Evaluation Report is "comprehensive and well executed" and contains "no gaps" that need to be addressed as part of any review. Accordingly, BCOAPO submits that the Commission should accept the Compliance Filing, as filed, without any further regulatory process at this time.

   However, if the Commission decides further process is required, BCOAPO will participate in whatever process the Commission deems appropriate.

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

   Response:

   BCOAPO agrees with BC Hydro and BCSEA that specific topics for the review of the CCF Pilot Program should be determined after the submission of the BC Hydro Two Year Evaluation Report.

If you have any questions, please do not hesitate to contact the undersigned.

Sincerely,
BC PUBLIC INTEREST ADVOCACY CENTRE

Original on file signed by:

Leigha Worth
Executive Director | General Counsel

Original on file signed by:

Irina Mis
Barrister & Solicitor

[1] Order G-5-17 and accompanying decision, page 96-97