



BCPIAC
Public Interest Advocacy Centre

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Our File: 7500.620

December 9, 2019

VIA E-FILING

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

Dear Mr. Wruck,

**Re: British Columbia Hydro and Power Authority Application to Amend Net Metering Service under Rate Schedule 1289 ~ Project No. 1599004
BCOAPO Information Requests No. 1 to Net Metering Ratepayers Group (NMRPG)**

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

Enclosed please find the BCOAPO's Information Requests No. 1 to NMRPG with respect to the above-noted matter.

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

Encl.

REQUESTOR NAME: **BCOAPO**
INFORMATION REQUEST ROUND NO: **#1**
TO: **NET METERING RATEPAYERS GROUP**
DATE: **DECEMBER 9, 2019**
PROJECT NO: **1599004**
APPLICATION NAME: **BC HYDRO'S APPLICATION TO AMEND
NET METERING SERVICE UNDER
RS 1289**

1.0 Reference: Exhibit C23-7, page 4, paragraph 3

- 1.1 Please explain how BC Hydro's proposed amendments "impose the risk of limited detrimental impacts on most customers in the Program".
- 1.2 Please explain how BC Hydro's proposed amendments "impose BC Hydro's own expectation of a significant detrimental impact on some customers in the Program with significant individual customer financial impacts".

2.0 Reference: Exhibit C23-7, pages 9-10, paragraphs 27-29

- 2.1 Please confirm that BC Hydro's statements regarding the payback period were based on the savings to customers from offsetting their own use and are not predicated on the NM rate.
- 2.2 If not confirmed please explain why.

3.0 Reference: Exhibit C23-7, page 14, paragraphs 45-46

- 3.1 In NMRPG's view is it appropriate for the BCUC to require BC Hydro to allow NM customers to install generating facilities that will knowingly produce power in excess of the customer's requirements and to also require BC Hydro to purchase the surplus generation at a price that exceeds the value to BC Hydro?
 - 3.1.1 If yes, please explain why.

4.0 Reference: Exhibit C23-7, page 15, paragraphs 48-49 and page 17, paragraph 56

- 4.1 Do the Interconnection Agreements between participating customers and BC Hydro contain any provisions or representations as to what price will be paid for surplus generation?
- 4.2 Do the SOP contracts contain provisions regarding the price that will be paid by BC Hydro for generation over the contract period?

5.0 Reference: Exhibit C23-7, pages 17-18 and page 23, paragraphs 91-95

- 5.1 Please provide the NMRPG's view as to the appropriate price that should be paid for surplus generation from NM customers? Please also provide the supporting rationale.
- 5.2 Please confirm that NM customers do not have any commitment to BC Hydro to provide a certain amount of surplus generation.
- 5.3 What is NMRPG's understanding as to the types of sales BC Hydro would forgo if surplus generation from NM customers is less than what BC Hydro was expecting it to be in a given period?

6.0 Reference: Exhibit C23-7, pages 20-21, paragraphs 70-72

- 6.1 Is it the NMRPG's position that, because the costs of the NM program are small, non-participating customers should pay a portion of the costs?
- 6.2 If yes, what at what level of surplus generation and costs would the NMRPG consider it to be inappropriate for non-participating customers to pay?
- 6.3 In its Decision regarding BC Hydro's most recent Rate Design Application (Order G-5-17) the BCUC rejected proposals by BCOAPO that would improve the affordability of electricity for low income customers on basis that they were not supported by an economic or cost of service justification (from BC Hydro's perspective). Should the same requirement apply to RS 1289? (i.e., the provisions must be supported by an economic or cost of service justification)?
 - 6.3.1 If not, why not?

7.0 Reference: Exhibit C23-7, page 27, paragraphs 99-101

- 7.1 Paragraph 99 states that for the one NMRPG customer noted daily hydro production is higher during the four month freshet period. Paragraph 101 states that energy from net metering projects has its highest value in the fall and winter. Does this mean that those times when the highest levels of output are being generated by hydro-based NM customers, the value of the energy produced is the lowest?

8.0 Reference: Exhibit C23-7, page 27, paragraph 102

- 8.1 Please provide references supporting the claims that: i) only 12 of BC Hydro's net metering customers have over-sized facilities and ii) BC Hydro has a total of 1,300 Net Metering customers.
- 8.2 Please reconcile these values with BC Hydro's response to BCUC 1.3.5 (Exhibit B-3) which indicates that as of F2019 BC Hydro had 1,900 Net Metering customers and that 400 of these had surplus energy generation.