

Anthony Lo

December 12, 2019

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

Via: Commission.Secretary@bcuc.com

Attention: Mr. Patrick Wruck
Commission Secretary and Manager

Dear Mr. Wruck,

Re: Project No. 1599030
BC Hydro and Power Authority Customer Crisis Fund Pilot Program – Year One Evaluation Report

I write to you my reply submission to BC Hydro's reply submission dated Dec 12, 2019. As per BCUC order #G-211-18, it does not appear that the order specifically mentioned that the Evaluation Report was to be for information purposes only. In fact, in the Reasons For Decision section 2.0 Reporting on CCF Pilot Program of Order #G-211-18, it states "Therefore, the BCUC finds that an earlier review of the CCF Pilot Program is warranted to allow for an earlier understanding of the CCF's actual results".

In addition, the Evaluation Report should mention implementing mandatory Pre-Grant and Post-Grant comparison which would aid in the effectiveness of the CCF Pilot Program. Also, the Evaluation Report should assess options that should be made available to ratepayers who have difficulty in paying their bills: equal payment plan, extending the due dates and making other payment arrangements. Lastly, the Evaluation Report should state how much bad debt expense was avoided due to the CCF Pilot Program.

Furthermore, the criteria of "would not amount to a social assistance program if it generates a utility benefit sufficiently justifiable on an economic or cost of service basis" as the basis for the CCF Pilot Program is not a valid reason due to BC Hydro being able to raise or lower the CCF rate rider. This would allow BC Hydro to determine how much it would receive from the CCF rate rider as a utility benefit. Considering that the utility benefits (reduction in collection costs, bad debt expense, working capital requirements and etc.) should have been addressed in the 2015 Rate Design Application (2015 RDA) and any subsequent Rate Design Application, the CCF Pilot Program is a social assistance / low income program and should be discontinued.

Given that the surplus from the CCF Pilot Program in Year One that can be as high as three million dollars have not been returned to the ratepayers and in all likelihood the surplus in Year Two, the numerous complaints and letters against the CCF Pilot Program, the high audit fail rate, lack of required financial information from applicants or anyone else in the household who received income from qualified programs, the high setup and annual operating costs and other issues raised in my late submission dated Nov 30, 2019 it would be more appropriate to do a review earlier than later as to the feasibility of even continuing the CCF Pilot Program.

In conclusion, BCUC Order #G-195-19 and #G-211-18 appears to give BCUC the mandate to do a review based on the CCF Pilot Program – Year One Evaluation Report as well as addressing the issues raised in my late submission dated Nov 30, 2019, reply submission dated Dec 12, 2019, interested party documents and letters of comment.

Thank you for your time and consideration.

Yours truly,


Anthony Lo