

22 May 2020

VIA E-FILING

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



Reply to: Leigha Worth
ED@bcpiac.org
Ph: 604-687-3034

Our File: 7200.610

Dear Mr. Wruck,

**Re: Corix Multi-Utility Services Inc. –Tariff Changes Application due to COVID-19
BCOAPO Information Request No. 1**

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

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

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

REQUESTOR NAME: BCOAPO *et al.*
INFORMATION REQUEST ROUND NO: #1
TO: Corix Multi-Utility Services Inc. (“Corix”)
DATE: May 22, 2020
APPLICATION NAME: Tariff Changes due to COVID-19

1.0 Reference: Exhibit B-2, BCUC IR 1.4.2, Tables 1 and 2 and Attachments 1 and 2

1.1 Please briefly explain why the assumptions in each scenario are different for the first group of 3 utilities than for the second group of 5 utilities. For example, are the assumptions based on past history regarding late payments or some other data?

2.0 Reference: Exhibit B-2, BCUC IR 1.4.1.1 and 1.4.2, Tables 1 and 2

Preamble: The Response to BCUC 4.1.1. states:
The Given that Corix has a small customer base and the amounts are small, the cost to calculate an LPC for some customers and not for other customers becomes cost prohibitive.

2.1 Would Corix’s calculations be the same if assistance would be required for a substantially longer period.

3.0 Reference: Exhibit B-2, BCUC IR 1.5.1

3.1 Please provide the weighted average cost of capital that Corix proposes to apply to balances in the COVID-19 deferral account and provide its components and their weightings.

3.2 If the proposed rate to be applied to the deferral account includes an equity component, please explain why including an RoE component is appropriate.

3.3 Please confirm that all components in the cost of capital referred to here are actual and not deemed; if unable to so confirm, please explain.

4.0 Reference: Exhibit B-2, BCUC IR 1.5.3, Table 3 and BCUC IR 1.5.4

4.1 Does Corix have any forecasted bad debt costs embedded in its current tariffs? If so, please provide details and explain briefly how this item is forecasted.

4.2 Does Corix collect bad debt expenses that exceed forecasted amounts after the fact from other ratepayers by any mechanism or are such amounts to the account of the shareholder?

5.0 Reference: Exhibit B-2, BCUC IR 1.7.1

- 5.1 Can Corix confirm that, in its view, any bill relief granted in the instant application filed in response to a global pandemic, should not be in any part the responsibility of the shareholder.
- 5.2 In Corix's view, are any possible catastrophes not typically forecasted, e.g., plagues, pestilence, biblical floods, Acts of God, etc., that should they occur, ought to be borne to any degree by the shareholder?
- 5.3 In its Response Corix discusses reasons why it is not proposing a bill relief program; however, it does not explicitly explain why it is not proposing a bill deferral program. Please explain why Corix is not proposing a bill payment deferral program.
 - 5.3.1 Would, in Corix's view, there be any "issues of fairness and equity" with the introduction of a bill payment deferral program that applies to residential customers who are unable to pay their energy bills because they have been directly impacted financially as a result of COVID-19, for reasons such as having lost their job or being unable to work?

6.0 Reference: Exhibit B-2, BCUC IR 4.1.1, 4.3.1, and 1.7.1

Preamble: The Response to BCUC 4.1.1. states:
The suspension of the LPC will apply to all customer bills from March 2020 until the end of the LPC suspension...

The Response to BCUC 4.3.1. states:
...Suspending the LPC for a short time period balances the need of customers who now need flexibility in managing their cash flows and the incentive for customers to pay on time. The longer the bills become outstanding with disconnections being suspended, it may incent customers who otherwise could have paid to not pay.

- 6.1 It is possible that the suspension of the LPC, when applied to all customers, could incent those "who otherwise could have paid to not pay". What about those customers who have been directly impacted financially as a result of COVID-19, and are completely unable to pay their energy bills? Should more substantial measures be implemented for them?
- 6.2 Is it more fair to assist those who have been directly impacted financially as a result of COVID-19 for a longer period than it is to provide short term assistance to everybody, whether needed or not?