

September 16, 2020

VIA ELECTRONIC MAIL

British Columbia Utilities Commission
6th floor, 900 Howe Street
Vancouver, BC V6Z 2N3
Attention: Marija Tresoglavic, Acting Commission Secretary

Dear Ms. Tresoglavic:

re: British Columbia Hydro and Power Authority (BC Hydro) Customer Crisis Fund Pilot Program - Two-Year Evaluation Report

I write in response to your letter of August 28 2020 pursuant to Order No. 6-224-20 (Appendix B) requesting comment on three points:

1. *Jurisdiction of BCUC to review the CCF Pilot Program in light of OIC 159*

I do not wish to judge this relationship. My view is that the BCUC should not have been held competent to approve the Pilot Project in the first place. Its competence to do so was presumably based on the view that the Pilot Project was to do with “rates”. Fundamentally, however, the Project is not about rates. It is more correctly described as an income maintenance program or more precisely an income transfer program. The transfer is effected by giving to customers classed (by BC Hydro) as needy, income taken from customers who are classed (by BC Hydro) as not needy. This kind of patchwork approach to the serious problems of inequality was discarded by Canada and the Provinces in the 1950's and 1960's and should not be revived now. Therefore, the Program should be discontinued and of course the BCUC should not be reviewing it.

2. *Whether BCUC should review the Pilot Program based on the information in the Evaluation Reports or whether the proceedings should be adjourned again.*

The evaluation should be discontinued and the Pilot Program likewise. However, insofar as the Program has now been adapted to serve a different purpose altogether, related to covid-19, I have no comment to make.

3. *If the BCUC nevertheless proceeds with a review of the Pilot Program based on the information in the Evaluation Reports, then*

a. *what should be the regulatory process and the supporting rationale?*

- Comment: there is no convincing rationale.

b. *what should be the specific topics addressed?*

- Comment: The objective of the CCF Pilot Program, as described by Mr. Fred James in his letter to you dated July 28, 2020, was “to assess whether a crisis fund available to all residential customers experiencing a temporary financial crisis can generate a utility benefit that sufficiently justifies itself on an economic or cost of service basis”. From the information that has been made available about the operation of the CCF it seems to me that it does not meet the

criterion of availability to “all residential customers experiencing a temporary financial crisis”. Perhaps a design problem. (Were the government’s experts in income support programs involved in the design?) My cursory review of the Two-Year Report suggests to me that it does not demonstrate much of a justifiable utility benefit. And the report that many people surveyed supported the idea of financial aid by way of assistance with electricity costs is not really relevant to the design and accomplishments of this particular program.

Thank you for the opportunity to comment. I would be happy to amplify any of my comments if you wish.

Yours sincerely,

Nancy Kenyon

