

November 12, 2020

Ms. Marija Tresoglavic
Acting Commission Secretary and Manager,
Regulatory Support
British Columbia Utilities Commission
Suite 410, 900 Howe Street
Vancouver, BC
V6Z 2N3

Dear Ms. Tresoglavic:

British Columbia Utilities Commission – Inquiry into Regulation of Safety

Surplus Energy - Intervener Submission

Several developments have occurred and will occur in the electric utility industry that are going to have an impact on safety; some examples are:

- The increasing popularity of electric vehicles,
- An increase in Distributed Energy Resources (DERs) and,
- The transfer from fossil fuels to renewable energy resources.

There are a number of organizations that will need to think about these issues including the BCUC and therefore this inquiry is quite timely. The major issue with electric utilities is that they have been in a monopoly situation for many years and now need to consider these new technical changes.

The following are my comments to the questions that the Commission proposed.

1. What is the BCUC's jurisdiction with respect to the regulation of safety and what aspects of a public utilities' activities does it apply to? (a) Does the BCUC have the authority under the UCA to set standards, rules or regulations with respect to safety?

The BCUC is responsible for reviewing the safety practices of BC Hydro. However, because of the complexity of the electrical system, the practical method for the BCUC to conduct this oversight is for them to compare the safety record of BC Hydro to other utilities.

Where BC Hydro is clearly in a monopoly situation there is no significant challenge to their authority. However, in the situation like electrical vehicle charging systems in large buildings and industry the lines of authority are not as clear. Another example is the development of

DERs where solar farms be connected to each other and independently supply energy resources to different customers. This is already happening in other jurisdictions. The BCUC and the Technical Safety Branch will need to consider how these situations should be regulated.

2. Are there currently any legislative gaps in the oversight of public utilities with respect to safety?

The UCA was developed at a time when BC Hydro had complete monopoly control on electrical generation and distribution. They still have this monopoly control but the development of DERs which has occurred in other regions and will eventually happen in BC raises a new situation. In anticipation of this event the BCUC and the Technical Safety Branch should consider what regulations need to be developed.

3. Are there any areas of legislative overlap or duplication in the oversight of public utilities with respect to safety?

As outlined by the Technical Safety Branch it appears that there are some overlap situations between these two bodies. Also, I believe there are situations where there are safety overlaps between Motor Safety Branch, BCUC, and the Technical Safety Branch.

4. Would a workshop in support of the Inquiry be beneficial? (a) If so, what would an appropriate scope for a workshop include?

I believe a workshop would be useful and two subjects that should be discussed are:

1. Electric vehicle charging in large commercial and industrial complexes,
2. The regulation of DERs.

Surplus Energy Match Inc.



Yours Sincerely, Paul Willis