



bcuc
British Columbia
Utilities Commission

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Sent via email/eFile

SSL COMPLIANCE WITH ORDER G-213-20 EXHIBIT A2-2
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Mr. Kyle Taylor
Manager, Sustainable Services Ltd.
957 Langford Parkway
Victoria BC V9B 0A5
info@ssl-bc.com; kyle@ssl-bc.com

Re: Sustainable Services Ltd. (SSL) – Compliance with Order G-213-20 – Project No. 1599154 – BCUC Staff Questions No. 1

Dear Mr. Taylor:

Further to the above-noted matter, please find enclosed British Columbia Utilities Commission Staff Questions No. 1. Pursuant to the regulatory timetable established by Order G-313-20, please provide your response on or before Wednesday December 23, 2020.

Sincerely,

Original signed by:

Marija Tresoglavic
Acting Commission Secretary

/cmv



Sustainable Services Ltd.
Compliance with Order G-213-20

STAFF QUESTIONS NO. 1 TO SUSTAINABLE SERVICES LTD.

A. STANDARD FEES AND CHARGES

- 1.0 Reference: SUSTAINABLE SERVICES LTD. (SSL) WESTHILLS THERMAL ENERGY SYSTEM (TES) TARIFF PAGES
BCUC Order G-213-20; City of Langford Bylaw No. 1291, 2010, Schedule G;
Exhibit A2-1, Attachment p. 2;
Standard Fees and Charges**

Directives 4, 6 and 7 of BCUC Order G-213-20 dated August 12, 2020, state:

4. The Paradise Falls TES rates and tariffs are pegged to the Lakeview Ridge and Glenvale TES rates and tariffs, provided that:
 - i. The Lakeview Ridge and Glenvale TES rates and tariffs continue to be set by the City of Langford; and
 - ii. The rates and tariffs charged to the Paradise Falls TES customers are the same as the rates and tariffs charged to the Lakeview Ridge and Glenvale customers receiving the same service.

6. If SSL:
 - i. Amends the rates and tariffs charged for Paradise Falls to mirror any amendments made to the rates and tariffs charged to Lakeview Ridge and Glenvale; or
 - ii. Amends the rates and tariffs charged for Paradise Falls so that they no longer mirror the rates and tariffs charged to Lakeview Ridge and Paradise Falls,

SSL must then file its respective Paradise Falls rates and tariff pages with the BCUC at least 10 days prior to making any adjustments. Supporting documentation for the rate and tariff adjustments for Lakeview Ridge and Glenvale must be included in order to be compliant with this directive.

7. If SSL changes the method by which the rates and tariffs for the Westhills TES are set, such that the City of Langford no longer sets the rates and tariffs, SSL must:
 - i. Notify the BCUC in writing within 30 days of the change; and
 - ii. File a rate application, pursuant to sections 59 to 61 of the UCA, within 90 days of the change.

The City of Langford Bylaw No. 1291, 2010,¹ Schedule G contains “Standard Fees and Charges.”

In Exhibit A2-1, page 2 of SSL’s Westhills TES Tariff provides a table titled, “Standard Fees and Charges.”

- 1.1 Please confirm, or explain otherwise, that the fees and charges for SSL’s Westhills TES are the same as the fees and charges for Lakeview Ridge and Glenvale customers receiving the same service.
- 1.2 Please confirm, or explain otherwise, that the City of Langford continues to set TES rates and tariffs for Lakeview Ridge and Glenvale.
- 1.3 Please explain whether the City of Langford Bylaw No. 1291, 2010, has been superseded by another document or otherwise updated by the City of Langford.
- 1.4 Please explain the reason for the appearance of discrepancies between the “Standard Fees and Charges” listed in the City of Langford Bylaw No. 1291 and those contained in SSL’s November 12, 2020 compliance filing. Please identify when these discrepancies first arose.
- 1.5 Please discuss whether the BCUC was notified of any tariff changes at least 10 days prior to SSL making any adjustments to its standard fees and charges, pursuant to Directive 6 of BCUC Order G-213-20.

B. TARIFF PAGE FILING

**2.0 Reference: SSL WESTHILLS TES TARIFF PAGES
BCUC Order G-213-20;
Exhibit A2-1, Attachment p. 1;
Tariff Pages**

Directive 5 of BCUC Order G-213-20 dated August 12, 2020, states:

5. SSL is directed to file rates and tariff pages for approval by the BCUC for all rates and tariffs charged to Paradise Falls customers, within 30 days from the date of issuance of this order.

In Exhibit A2-1, page 1 of SSL’s Westhills TES Tariff is titled, “Westhills TES – Stream A & Stream B (“Paradise Falls”).”

- 2.1 Please confirm whether SSL wishes to re-file tariff pages for Stream B customers only.
 - 2.1.1 If not confirmed, please explain why SSL prefers to file tariff pages for Stream A and B customers jointly, and confirm that SSL is aware tariff pages would need to be re-filed pursuant to the directives of Order G-213-20 for any rate change for either Stream A or Stream B customers.

¹ <https://www.langford.ca/assets/Bylaws/Services/multi-utility-schedules-1291.pdf> retrieved December 8, 2020.

C. WEBSITE AND BILLING MATERIALS

- 3.0 Reference: SSL-BC.COM
BCUC Order G-213-20; “Usage Rates”, SSL-BC.com;
Exhibit A2-1, p. 1;
Website and Billing Materials**

Page 10 of the Reasons for Decision accompanying Order G-213-20 states:

The Panel notes that SSL’s website currently states that “[a]ll energy rates and charges are regulated by the City of Langford in accordance with the terms of their multi-utility bylaw.” To ensure that SSL’s customers are informed and are aware of the regulatory regime in which SSL operates, SSL is directed to update its website, billing documents and any informational materials provided to its customers to clearly state that SSL is a public utility under the UCA and is regulated by the BCUC within 30 days of this order.

On page 1 of Exhibit A2-1, SSL states:

...we attempted to comply with Directive 8 by amending any content related to TES rates and/or regulation with an accompanying statement about SSL's oversight by the BCUC under the UCA. These content revisions were made on September 11, 2020, including updates to the back page of applicable billing templates, letters contained in new customer "welcome packages", and various pages on our website (www.SSL-BC.com).

On the “Usage Rates” page under the “Energy” section of SSL’s website², SSL’s website reads:

All energy rates and charges are regulated by the City of Langford in accordance with the terms of their multi-utility bylaw. With respect to its Energy Service, SSL is also a public utility under the UCA regulated by the BC Utilities Commission.

- 3.1 Please discuss whether SSL considers that it may serve to eliminate customer confusion about the regulatory regime in which SSL operates to remove the language that energy rates are “regulated by the City of Langford in accordance with the terms of their multi-utility bylaw” (or similar) from its website and billing materials.

² http://ssl-bc.com/ssl_e_energy-rates/ retrieved December 8, 2020.