

Robyn Irvine

[REDACTED]
Nelson, BC, V1L 6X1

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British Columbia Utilities Commission
Suite 410, 900 Howe Street
Vancouver, BC Canada V6Z 2N3

To whom it may concern:

I am writing to express my concern about Nelson Hydro's proposed rate rise of 5.72% per year for three years for rural customers for a total rise of 18.17% by 2023.

There are several reasons I find the proposed pricing structure poorly thought out and ask you to reject the proposal from Nelson Hydro.

- 1) The increase per year is not in line with fair consumer pricing as laid out in Ontario's Fair Hydro Plan where increases are limited to the rate of inflation since that is generally matched to basic wage increments of unionized workers. This rapid and overall large rate increase will be difficult to manage financially for many users.
- 2) The disproportionate burden that Nelson Hydro is choosing to lay on rural users is unfair and unjustified. If they had continued to improve their infrastructure in rural settings over the years by putting lines underground, increasing the number of junctions so that power outages affect less households when trees come down and clearing and brushing proactively, the costs of running the rural system would not be so high. They are passing the costs of poor, reactive management of their infrastructure onto their customers in a short, sharp blow. In addition, there is no farm rate in their structure and increasingly the food security of the Kootenays is being supplied by small local farms in the rural areas.
- 3) Rural people support the municipality of Nelson with their taxes already as well as supporting local businesses through purchases as well as providing personnel for the many services in Nelson. We also provide the main outdoor recreation areas that all the people who live in the city enjoy and use daily. We all have Nelson on our postal addresses but are being made to feel that we are separate from the same considerations and services with this structuring.
- 4) There is no conservation or step change in rates after a threshold usage level has been reached. Nelson Hydro should be encouraging conservation actively as is done by other utilities such as Fortis and BC Hydro who both have base rates that step up after the household has used 1350-1600 kWh of power. Alternately, a model like peak and off-peak rates like is used in Ontario could be used to encourage a more dispersed power usage curve if that is of use to the operation of the utility.

I thank you for your time and consideration of these concerns and ask that this application be denied.

Sincerely,

Robyn Irvine