# 2015 RATE DESIGN APPLICATION (RDA) WORKSHOP NO. 9A

- 1. ELECTRIC TARIFF TERMS AND CONDITIONS
- 2. DEFAULT RESIDENTIAL RATE DESIGN



# **AGENDA**

#### Part 1: Electric Tariff Terms and Conditions

- 1. Introduction and Standard Charge Principles
- 2. Update on other items from Workshop 3
- 3. Reconnection Charge and Re-Application for Service
- 4. Meter Test Charge
- 5. Security Deposits

#### Part 2: Default Residential Rate Design

- 1. Context
- 2. Modelling assumptions and process
- 3. Status Quo (SQ) Residential Inclining Block (RIB) rate
- 4. Alternative designs to the RIB



# PART 1 TERMS AND CONDITIONS

- 1. Introduction and Standard Charges
- 2. Update on other items from Workshop 3
- 3. Reconnection Charge and Re-Application for Service
- 4. Meter Test Charge
- 5. Security Deposits



#### 1. INTRODUCTION AND STANDARD CHARGE PRINCIPLES

 Section 11 of the Electric Tariff consists of a schedule of standard charges. Other relevant sections include:

Section	Description
3.14	<ul> <li>Service Connections (not part of Workshop 3; limited to presenting updated costs at Workshop 7)</li> </ul>
4.2.5	<ul> <li>Legacy Meters and Radio-off Meters (Workshop 1: not in scope for 2015 RDA given recent British Columbia Utilities Commission (BCUC) review)</li> </ul>
6.0	<ul> <li>Late Payment Charge; Returned Cheque; Account Charge; Collection Charge; Call-back Charge; Reconnection Charge</li> </ul>

- COPE 378 asked BC Hydro to set out the principles informing standard charges.
   The principle informing BC Hydro's Standard Charges is:
  - Cost recovery for activities undertaken because of a request or action of a specific customer, whether existing or new
- Single, blended cost applied to all customers, for fairness and simplicity



### TIMING OPTIONS FOR UPDATING STANDARD CHARGES

## Option 1 – Update with RDA filings

 Comprehensive RDA filings have been infrequent; charges were last updated in 2007

Option 2 – Update with other more periodic filings such as: (1) Rate change compliance filings or (2) Revenue Requirement Application (RRA) filings

BC Hydro would like stakeholder feedback on the timing options for updating of Standard Charges.



### 2. UPDATE ON OTHER ITEMS FROM WORKSHOP 3

(for which there appears to be a fair degree of stakeholder consensus)

Discussed in Workshop 3	Current Charge	Recommendation (F2017)
Non-Payment Report Charge	N/A	Will not pursue
Credit Card Charge	N/A	Will not pursue
DataPlus Service	\$360 per year	Eliminate this Standard Charge
Collection Charge	\$39	Eliminate this Standard Charge
Late Payment Charge	1.5% per month (equivalent 19.6% per annum compounded monthly)	No amendment proposed
Account Charge	\$12.40	<ul> <li>Update to reflect current costs (~\$13.50)</li> <li>Will not pursue differentiated charge</li> </ul>
Returned Payment Charge	Equivalent to BC Hydro's lead bank's Not-Sufficient Funds cheque charge in effect on 1 April of each year	<ul> <li>Update to reflect current costs (~\$6.15)</li> </ul>

- Refer to the Workshop 3 consideration memo for the rationale for charges not being pursued
- Reconnection charge remains most significant charge issue



# 3. RECONNECTION CHARGE (SECTION 6.7)

- Feedback from Workshop 3
  - Technology infrastructure costs should not be included
  - Rate should be blended to reflect both automated and manual activities.
- Disconnection following non-payment is the primary activity considered
  - Costs of late payment notices, etc. are borne by all customers
  - Disconnection and reconnection costs are incurred because of the specific customer failing to pay
- Reconnection Charge
  - Update charge to reflect current costs
  - Update Terms and Conditions related to re-application for service and exclusions from when charge is applied



# MINIMUM RECONNECTION CHARGES

## \*\*Illustrative Example from Workshop 3\*\*

Fair degree of stakeholder consensus

	Unit Cost per Reconnection			
Process Step	Scenario 1	Scenario 2	Scenario 3	Scenario 4
	Full Costing	50% IT Disconnect	100% IT Reconnect	No IT
Initiate Disconnection				
Agent costs	\$6	\$6		\$6
Disconnect Customer				
Remote Disconnect Reconnect (RDR) Metering and Information Technology (IT)	90	45		
Manual disconnection	8	8		8
Report a Payment / Initiate Reconnection				
Agent costs	3	3	3	3
IT investment in self-service reconnections	6	6	6	6
Reconnect Customer				
RDR Metering and IT	90	90	90	
Manual reconnection	10	10	10	10
Charge per Non-pay Disconnect / Reconnect	\$213	\$168	\$109	\$33
Total Costs Recovered	\$3.9M	\$3.1M	\$2.0M	\$0.6M

Scenario 1: All costs (labour and IT) for disconnection and reconnection are allocated to the reconnection charge

Scenario 2: 50% of RDR IT costs for the disconnection are allocated to the reconnection charge

Scenario 3: No disconnection costs included; IT costs for reconnection are allocated to the reconnection charge

Scenario 4: IT excluded; costs reflect labour and vehicles for disconnection and reconnection

Note: Manual reconnection costs assume reconnections during normal working hours

# PROPOSED RECONNECTION CHARGE

**Current Estimate of Costs for Illustrative Purposes** 

		% of	
Process Step	Cost	Disconnections	Blended Unit Cost
Agent			
Initiate disconnection	4.40	100%	\$4.40
Initiate reconnection	4.67	40%	1.87
Manual Disconnect / Reconnect			
Disconnection	265.46	3%	5.81
Reconnection	175.00	8%	14.00
Charge per Non-pay Disconnect / Reconnect			\$26.07

If a manual reconnection is required, a request to perform it outside of normal working hours would incur an additional cost to reflect labour rates

One stakeholder suggested advancing the timing of this component of the 2015 RDA. BC Hydro would only be prepared to act on this if there is unanimous stakeholder view that the proposed updated Reconnection Charge adequately recovers costs. BC Hydro seeks stakeholder feedback on both the cost basis and the timing for filing concerning the proposed Reconnection Charge.



## **RECONNECTION CHARGE - OTHER WORDING CHANGES**

Scenario	Application of Reconnection Charge
Vacant / Unsigned Accounts	<ul> <li>Benefits all customers by limiting consumption by non account holders</li> </ul>
	<ul> <li>Business practice is now to disconnect shortly after a premises is vacated; reconnection charge is no longer appropriate in many circumstances</li> </ul>
Customer-side Breaker	<ul> <li>Digital meters require continuous supply of electricity</li> <li>BC Hydro prefers customers to request disconnection rather than temporarily shutting off electricity with their breaker</li> </ul>

Changes will be proposed to Electric Tariff section 6.7 to clarify that waiving the reconnection charge as set out above is appropriate



# **RE-APPLICATION FOR SERVICE (SECTION 2.6)**

- If an account is re-opened by same customer within 12 months, the customer is charged the greater of:
  - the minimum reconnection charge, or
  - the sum of minimum charges that would have been paid had service not been terminated
    - E.g., the current Basic Charge for a residential account (RIB rate) is 16.64 cents per day
- BC Hydro is proposing no changes at this time except to update costs and to reflect any changes to the RIB rate (to the Basic Charge and/or separate Minimum Charge), and possibly other rates



# 4. METER TEST CHARGE

- Currently, if a customer requests an independent meter test, the customer is charged the Minimum Reconnection Charge if the meter is found to be accurate
- Provides partial recovery of costs incurred to exchange the meter and send it to Measurement Canada

#### **Three Meter Test Charge Options:**

- Option 1 Minimum Reconnection Charge (new proposed: ~\$26)
  - Lower charge is far below BC Hydro's costs and will not deter frivolous requests for meter tests
- Option 2 Service Connection Charge (new proposed: \$181)
  - More closely reflects cost recovery as the connection activities are similar
  - Higher charge may create a barrier to pursuing meter testing
- Option 3 Prior Minimum Reconnection Charge (\$125) (new "Meter Test Charge")
  - May balance customer needs and cost recovery

BC Hydro requests feedback on the appropriate level of cost recovery for meters that are tested by Measurement Canada at the customer's request but are found to be accurate



# 5. SECURITY DEPOSITS (SECTION 2.4)

- New customer applicants that have not "established credit satisfactory to BC Hydro"
- Existing customers that have not "maintained a credit history satisfactory to BC Hydro"
- Currently, if BC Hydro chooses to apply a security deposit, the amount is prescriptive

2x/3x Average Monthly Bill



# **DRAWBACKS**

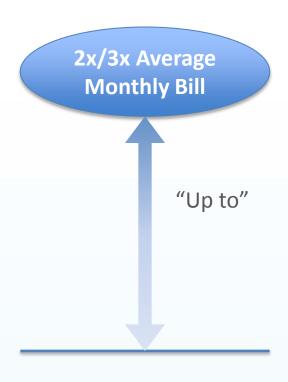
- Amount held may not match the financial risk
- Difficult to administer
- Creates difficulties applying a security deposit to the 'right' situations
  - Bad debt and aged receivables are significantly influenced by accounts with low dollar amounts
  - Currently waive security deposits
     <\$110, regardless of credit history</li>

2x/3x Average Monthly Bill



# **PROPOSAL**

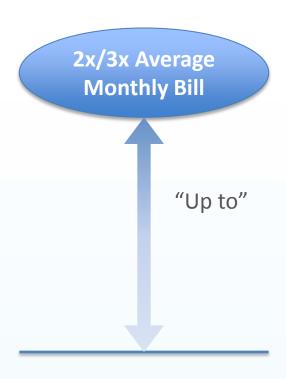
- Proposed tariff change:
  - Up to 2x/3x the average monthly bill
- No change to maximum
- Allows flexibility to charge a lesser amount





# **BENEFITS**

- Administrative simplicity
  - E.g., allows option for standardized deposit amount
- Customer acceptance
  - Allows for lesser amounts to be required when risk is not as great
- Improved financial risk management
  - Practical approach for securing low consumption accounts





# ADDITIONAL WORDING CHANGE

- A security deposit is assessed (or waived) at the time of account setup based on an assumed level of consumption
- There is no provision within the Electric Tariff to increase the amount of a security deposit if actual consumption is higher
- Will be requesting a wording change that would allow a security deposit to be assessed or increased if actual consumption is significantly greater than what was initially assumed

BC Hydro seeks stakeholder feedback on the security deposit proposal (slide 15), the additional wording change proposal above, and whether there are any other issues.



# PART 2

# DEFAULT RESIDENTIAL RATE DESIGN

- 1. Context
- 2. Modeling Assumptions and Process
- 3. SQ RIB Rate
- 4. Alternative Designs to the RIB

# PART 2 RESIDENTIAL RATE DESIGN

**CONTEXT - STAKEHOLDER FEEDBACK AND CONSIDERATION** 



## ALTERNATIVE DESIGNS CARRIED FORWARD

#### **Three Step Inclining Block Rates**

1. Workshop 3 Model: Step 1/2 Threshold = 675 kWh/month (SQ)

(Model A) Step 1 rate = SQ

Step 2 rate = Energy Long Run Marginal Cost (LRMC)

Derived: Step 2/3 Threshold & Step 3 rate (10 percent bill impact)

2. BCOAPO Model 1: Step 1/2 threshold = 250 kWh/month (Model B) Step 2/3 threshold = 675 kWh/month

Step 2 rate = Energy LRMC

Step 3 rate = 10% higher than LRMC

Derived: Step 1 rate

3. BCOAPO Model 2: Step 1/2 threshold = 250 kWh/month (Model C) Step 2/3 threshold = 2000 kWh/month

Step 1 rate = 3 cents/kWh

Step 3 rate = Independent Power Producer-related energy price + capacity +

T&D loss (~13 cents/kWh)

Derived: Step 2 rate



# **ALTERNATIVE DESIGNS NOT CARRIED FORWARD**

1. Customer Specific Baseline Rate (Default)	Agreement option should not be advanced because not viable
2. Flat Rate (Default)	Broad agreement option should not be advanced given that the RIB rate is functioning as it should and balances a number of competing objectives
3. Seasonal Threshold (Default) A higher consumption threshold targeted to winter peak season (lower effective winter rate)	<ul> <li>Misaligned with cost causation (lower rates in winter despite BC Hydro being a winter peaking utility)</li> <li>Unlikely to achieve objective of moderating electric heating bills (refer to Workshop 3 slide deck presentation concerning bill impact analysis, slides 40-41)</li> <li>No jurisdictional support (utilities with seasonal rates charge a higher rate in winter if winter peaking)</li> <li>May conflict with and potentially dilute simple RIB conservation message</li> </ul>
4. Seasonal Rate A higher rate targeted to winter peak season (Default or Optional)	<ul> <li>Imposes bill impacts on winter heating customers</li> <li>Only one Canadian jurisdiction, Newfoundland Power, offers optional season rate (higher rate in winter) – 1% participation; BC Hydro would anticipate a low participation rate under an optional structure</li> <li>Optional structure unlikely to achieve incremental winter peak capacity or energy savings</li> </ul>
5. Voluntary Time of Use (TOU) Rate (Optional)	<ul> <li>Near unanimous stakeholder agreement that BC Hydro should not pursue at this time</li> <li>Self-selection - low expected participation (+ cost shifting to non-participants)</li> <li>Low to modest expected capacity savings (+ no long-term deferral value for planning)</li> <li>May conflict with simple RIB conservation message</li> </ul>
6. COPE 378 Three-Step Rate (Default) A higher rate to generate revenue from affluent, gluttonous customers to allow for subsidy to low income ratepayers	<ul> <li>No cost basis to define or target gluttonous consumption through a very high Step 3 rate</li> <li>No cost basis to set lower rate or consumption threshold targeted to low income customers</li> <li>BC Hydro of the view that BCUC cannot set rates based on customer income level</li> <li>BC Hydro has brought forward three versions of a three-step rate for stakeholder input</li> </ul>

# **RIB RATE-SPECIFIC DESIGN & PRICING OPTIONS**

1. SQ Step 1 / Step 2	Alternative RIB rate thresholds are not carried forward from Workshop 3
Threshold	No substantive changes to conservation from alternative thresholds
	SQ design has the advantage of customer understanding and acceptance
	Thresholds within a "lifeline rate" concept are considered through 3-step rate alternatives
2. SQ Basic Charge	In-depth rate modeling of the SQ Basic Charge is carried forward; BC Hydro does not see a basis for increasing the Basic Charge fixed cost recovery from ~45%, but seeking feedback
	45% cost recovery is in line with other jurisdictions - utilities generally have fixed charges
	Stop short of 100% cost recovery due to high bill impacts and minimal jurisdictional support
3. Minimum Charge	In-depth rate modeling of a separate Minimum Charge = \$15/month is carried forward
	May be warranted to reflect cost of remaining attached to system (low use / dormancy)
	Additional cost recovery may benefit lower consuming customers (including some low income)
	\$15/month roughly equates to average fixed cost per month assigned to the Residential class
	Increases portion of fixed cost recovery
4. Step 2 Pricing in	Fair degree of consensus that pricing Step 2 rate in reference to LRMC remains appropriate
reference to LRMC	No strict rule to set Step 2 rate equal to LRMC; balance other rate design objectives
	BC Hydro opposes capping Step 2 at exactly the upper bound of LRMC
	Are there reasons to intentionally set a rate above LRMC? (3-step rate design?)
5. Pricing Principle	Two Options:
(F2017-F2019)	Option 1: Apply RRA rate increases equally – current principle approved by BCUC in 2013 RIB Repricing Application
	<ul> <li>Option: 2: Apply RRA rate increases to Step 1 only, given that Step 2 rate is currently above the upper bound of LRMC</li> </ul>

# **ENERGY LRMC + CAPACITY**

#### **BC** Hydro

- Energy LRMC is the appropriate pricing referent for an inclining block energy rate
- While recognizing RIB-related energy savings deliver associated capacity savings included in BC Hydro's resource stack, adding capacity value would confuse the pricing of the RIB with its purpose to signal efficient energy use
- FortisBC includes energy value and capacity value of about \$35/kW-year as proxy for avoided Transmission and Distribution costs for LRMC for its Demand Side Management (DSM) initiatives – BC Hydro view: RIB-related Transmission and/or Distribution deferral benefits are uncertain
- If capacity value is included for RIB (and other rate setting) LRMC purposes, should be based on capacity generation - Revelstoke Unit 6 (Rev 6) (about \$50/kW-year), which would increase the energy LRMC by about \$11/MWh (F2013)

#### Participant feedback to date

The LRMC for RIB should include a capacity value because the RIB delivers associated capacity savings

#### Approach going forward

- Assume annual inflation in the F2013 estimated range in LRMC
- Model the 3-step rate alternatives using Energy LRMC (= the Step 2 rate in Model A and Model B)
- Evaluate 3-step rate alternatives in recognition of energy LRMC with/without capacity based on Rev 6
- Examine sensitivity of RIB pricing on balance with all criteria, using LRMC with/without capacity based on Rev 6

## **CUSTOMER BILL IMPACT TEST**

In its Workshop 3 consideration memo, BC Hydro agreed to review the bill impact test – its purpose and the applicable customer percentile threshold

Workshop 1: BC Hydro's proposal was to maintain 2013 RIB Re-pricing Application approach

 Maximum of 10% bill impact, representing all-in costs (consisting of RRA rate caps + deferral account rate rider (DARR) + rate changes due to rate rebalancing + rate changes due to rate design), to single most adversely impacted customer – to be used for modelling purposes

#### **Considerations**

- 10% bill impact test first used in BC Hydro's 1991 RDA as a guideline, based on a definition of rate shock
- 10% level is an amber signal and not a stop or go constraint, unless indicated otherwise
- Bill impact test is appropriate for evaluating the pricing of the SQ RIB rate because the rate is simple and there's a clear direct relationship: the larger the customer, the larger the impact
- Applying the 10% test to any threshold level other than the most adversely impacted customer will lead to definitional problems, or will have unintended consequences

BC Hydro is of the view that the purpose and level of the customer bill impact test remains appropriate to evaluate the trade-offs between designs, but seeks additional stakeholder feedback



# PART 2 RESIDENTIAL RATE DESIGN

**CONTEXT – JURISDICTIONAL REVIEW** 



## **JURISDICTIONAL REVIEW – DEFAULT RESIDENTIAL RATES**

- BC Hydro circulated its proposed jurisdictional selection for 2015 RDA Residential rate analysis on 12 March 2015
- BC Hydro chose jurisdictions based on:
  - Canadian geographical diversity + vertically integrated utility structure (this leaves out Alberta and Ontario only)
  - British Columbia Rate Comparison Regulation (Washington, Oregon, California) + Regional U.S. utilities in the Western Electricity Coordinating Council + utilities of a larger size (>400,000 customers)
- To date, fair degree of consensus from stakeholders that these are the appropriate jurisdictions to review
  - Requests for survey of low income-related rates and underlying legislation (please refer to RDA Workshop 9 Discussion Guide for more information)



#### **JURISDICTIONAL REVIEW – HIGHLIGHTS**

- Canada:
  - Default Residential Two-step inclining block or flat energy charge;
     Basic Charge typically recovers between 35%-70% fixed costs;
     almost all utilities have no demand charge
  - Optional Residential few optional rates offered; low participation
- Selected U.S
  - Default Residential inclining block energy charges; no demand charge;
  - Optional Residential various rates offered, including TOU and EV rates; low participation



## PART 2 – CONTEXT (CANADIAN JURISDICTIONAL REVIEW (2015))

Canadian Utility	Energy Charge	Basic Charge (& % of total allocated fixed costs)	Demand Charge	Optional Rate
SaskPower	Flat 12.346 c/kWh City 12.369 c/kWh Rural	\$/month \$20.22 City (22%) \$29.19 Rural	No	No
Manitoba Hydro	Flat 7.381c/kWh	\$/month \$7.28 < 200 Amp (34%) \$14.56 > 200 Amp (68%)	No	No
Hydro Quebec	Inclining Block (two-tier) < 30 kWh/day: 5.57 c/kWh Remaining energy: 8.26 c/kWh	\$/day 40.64 c/day (55%) (\$12.30/month)	> 50 kW demand \$6.21/kW/mo Winter \$2.52/kW/mo Summer	Dual Energy Discount to alternative fuels when very cold (-13C or -15C)
Nova Scotia Power	<b>Flat</b> 14.947 c/kWh	\$/month (62%) \$10.83	No	<b>TOU</b> (3% participation) Restricted to defined electrical heating end-use
Newfoundland Power	<b>Flat</b> 11.178 c/kWh	\$/month (65%) \$15.68 < 200 Amp \$20.68 > 200 Amp	No	Seasonal Rate (1% participation) Winter – premium Non-winter – credit
New Brunswick Power	Flat 10.25 c/kWh	\$/month \$20.48 City (100%) \$22.46 Rural (100%)	No	No
ATCO Electric Yukon	Inclining Block (three-tier)(Non-gov.) < 1000 kWh/mo. 12.14 c/kWh 1001-2500 kWh/mo. 12.82 c/kWh > 2500 kWh/mo. 13.99 c/kWh	\$/month \$14.65 (39%)	No	No
FortisBC	Inclining Block (two-tier) < 1600 kWh 9.093 c/kWh (60 day) > 1600 kWh 13.543 c/kWh (60 day)	\$/60 day billing \$30.33 (44%)	No	No (TOU – closed with introduction of Inclining Block) (0.1% participation)
BC Hydro	Inclining Block (two-tier) < 675 kWh/mo. 7.52 c/kWh > 675 kWh/mo. 11.27 c/kWh	\$/day (45%) 16.64 c/day (\$5/month)	No	No

## PART 2 – CONTEXT (U.S JURISDICTIONAL REVIEW (2015) (\$US))

Western U.S. Utility > 400,000 customers	Energy Charge	Basic Charge	Demand Charge	Optional Rate
Puget Sound Energy (1 million customers)	Inclining Block (two-tier) < 600 kWh/mo. 8.5578 c/kWh > 600 kWh/mo. 10.4157 c/kWh	\$/month \$7.49 single phase \$17.99 three phase	No	No
Seattle City Light (400,000 customers)			No	No
Pacific Power Oregon (PacifiCorp entity) (500,000 customers)	Inclining Block Combined Effective Rate: < 1000 kWh/mo.: 9.884 c/kWh > 1000 kWh/mo.: 11.859 c/kWh	<b>\$/month</b> \$9.61	No	Separate meter EV charging     (rates=default)     Seasonal TOU     Renewable portfolio charges     (energy supply / habitat restore)
Portland General Electric (830,000 customers)	Inclining Block (two-tier) Combined Effective Rate: < 1000 kWh/mo.: 10.672 c/kWh > 1000 kWh/mo.: 11.394 c/kWh	\$/month \$10.00	No	<ul> <li>TOU - whole premise (0.3% participation) or separately meter</li> <li>EV (zero participation)</li> <li>Renewable portfolio charges</li> </ul>
Idaho Power (500,000 customers)	Inclining Block (seasonal three-tier) Summer (S): June – August Non-summer (NS): all other months <800 kWh: 8.5748¢ (S) 7.9675¢ (NS) 801-2000 kWh: 10.3108¢ (S) 8.7839¢ (NS) > 2000 kWh 12.2486¢ (S) 9.7280¢ (NS)	<b>\$/month</b> \$5.00	No	No
Public Service Company of Colorado (Xcel Energy) (1.4 million customers)	Inclining Block (summer two-tier) Summer: Jun – Sept < 500 kWh/mo. 4.604 c/kWh > 500 kWh/mo. 9.0 c/kWh Winter: Oct – May: 4.604 c/kWh	\$/month \$6.75 "Service and Facility Charge"	No	<ul> <li>Seasonal Demand charge</li> <li>Outdoor Area Lighting</li> <li>TOU</li> <li>Peak Time Rebate</li> <li>Critical Peak Pricing</li> </ul>
Public Service Company of New Mexico (500,000 customers)	Inclining Block (seasonal three-tier) S: June – August NS: all other months First 450 kWh/mo. 9.06237 c/kWh (S + NS); Next 450 kWh/mo. 13.73455 c/kWh (S) 11.85101/kWh (NS); Remaining kWh/mo. 15.76960 c/kWh (S) 12.8352 c/kWh (NS)	<b>\$/month</b> \$5.00	No	Seasonal TOU     Renewable energy supply

## PART 2 – CONTEXT (U.S JURISDICTIONAL REVIEW (2015) (\$US))

Utility	Energy Charge	Basic Charge	Demand Charge	Optional Rate
Pacific Gas and Electric Company (5.1 million electric customer accounts)	Inclining Block (four-tier)  Tier 1 = Baseline allocation kWh (16.2 c/kWh)  Tier 2 = 101%-130% of baseline (18.5 c/kWh)  Tier 3 = 131%-200% of baseline (27.3 c/kWh)  Tier 4 = > 200% of baseline (33.3 c/kWh)  Baseline allocation  Reflects essential portion of energy use (~50-60% of reasonable need)  established by California Public Utilities Commission (CPUC); based on region, season and all electric versus electric + gas  CARE (California Alternate Rates for Energy)  Separate lower rates (under three tiers) for qualified customers  Medical Baseline Allowance  Qualifying customers with special heating, cooling or life support needs	\$/meter/day (Minimum Energy Charge) \$0.14784 (\$4.50/month)	No	TOU (~2% participation (2012)) Summer (\$)(May-Oct); Winter (\$)(Nov-Apr) Peak and Off-Peak rates All four tiers  EV TOU (~0.05% participation (2012)) Summer and Winter periods Peak, Partial-Peak and Off-Peak rates Single energy charge \$/kWh – no tiers  EV TOU Example (no meter charge): Peak: 2pm-9pm Mon-Fri 3pm-7pm Sat-Sun, Holidays \$ \$0.43 W \$0.29  Partial Peak: 7am-2pm: Mon-Fri 9pm-11pm: Mon-Fri \$ \$0.22 W \$0.17  Off-Peak: All other hours \$ \$0.098 W \$0.101
Southern California Edison (14 million customers)	Inclining Block (four-tier)  Tier 1 = Baseline allocation kWh (15 c/kWh)  Tier 2 = 101%-130% of baseline (+4 c/kWh)  Tier 3 = 131%-200% of baseline (+11 c/kWh)  Tier 4 = > 200% of baseline (+16 c/kWh)  Baseline allocation (as above)  CARE (California Alternate Rates for Energy)  Separate lower rates (under three tiers) for qualified customers  Medical Baseline Allowance  Qualifying customers with special heating, cooling or life support needs	\$/month \$0.93/month	No	<ul> <li>Three TOU options <ul> <li>A. Three periods and pricing targeted to generally lower consumers (&lt;700kWh/mo.)</li> <li>B. Three periods and pricing targeted to generally higher lower consumers (&gt;700kWh/mo.)</li> <li>C. Two periods and pricing targeted to high-usage and self-generation customers</li> </ul> </li> <li>Three EV options <ul> <li>Residential Plan (Default or TOU above)</li> </ul> </li> <li>Residential Plan Time-of-Use Plan (D) (offers a super off-peak period / low rate)</li> <li>EV Rate Plan through separate meter</li> </ul> <li>Participation in TOU/EV not recorded, likely because very low</li>

## PART 2 – CONTEXT (U.S JURISDICTIONAL REVIEW (2015) (\$US))

Utility	Energy	Basic	Demand	Optional
	Charge	Charge	Charge	Rate
San Diego Gas and Electric  (1.4 million electric customer accounts)	Inclining Block (four-tier) - Summer and Winter Tier 1 = Baseline allocation kWh Tier 2 = 101%-130% of baseline Tier 3 = 131%-200% of baseline Tier 4 = > 200% of baseline  CARE (California Alternate Rates for Energy) • Separate lower rates (under three tiers) for qualified customers  Medical Baseline Allowance • Qualifying customers with special heating, cooling or life support needs	Minimum Bill \$0.170/kWh	No	<ul> <li>TOU (seasonal on/semi/off peak + baseline adjustments)</li> <li>TOU - Distributed Energy Resources (seasonal 4 tier)</li> <li>TOU - Solar Energy Systems (seasonal on/semi/off peak)</li> <li>TOU - EV (seasonal on/off/super peak)</li> <li>TOU - Plus (event response) (seasonal on/semi/off peak + baseline adjustments)</li> </ul>



# PART 2 RESIDENTIAL RATE DESIGN

CONTEXT – DSM AND LOW INCOME PROGRAMS / RATES



## **DSM INITIATIVES AND LOW INCOME PROGRAMS**

As part of its Workshop 3 consideration memo, BC Hydro committed to providing information on:

- 1. Role of the RIB rate in comparison to the other two DSM tools (codes and standards, and programs); and
- 2. Information on BC Hydro's low income DSM programs

As part of the lead-up to this workshop, BC Hydro circulated its proposed residential rate jurisdictional selection and asked if stakeholders wanted a survey of low income rates including statutory underpinnings

- Several stakeholders asked BC Hydro to conduct such a survey
- For purposes of this workshop, BC Hydro surveyed Canadian utilities and focuses on Ontario and Nova Scotia as the subject of court decisions
- Overview provided at slide 37 Please refer to RDA Workshop 9 Discussion
   Guide for more information



# RIB RATE, CODES AND STANDARDS AND PROGRAMS

Residential DSM: Forecast Cumulative Energy Savings F2015 – F2021 (Gigawatt hours)						
	Codes and Standards Programs Rate Structures Total					
Residential	1,488	266	142	1,896		

**Code and standards -** Public policy instruments enacted by governments to influence energy efficiency Examples:

- B.C. Building Code (amendments effective 19 December 2014 introduce new energy efficiency requirements to Part 9 for houses)
- Energy efficiency regulations such as B.C. Energy Efficiency Standards Regulation (purpose is to improve energy efficiency of among other things various household appliances and structures such as doors and windows)
- Local government zoning and building permitting processes

**Programs** – Designed to support rate structures and codes and standards, as well as to address remaining barriers to energy efficiency and conservation after rate structures and codes and standards

 BC Hydro residential DSM programs are: Low Income; Behaviour; Refrigerator Buy-Back; New Home; Residential Rebate; Renovation Rebate; and Load Displacement

BC Hydro will submit a section 44.2 *Utilities Commission Act* DSM expenditure schedule as part of its next RRA

#### DSM REGULATION AND BC HYDRO LOW INCOME PROGRAMS

- On 10 July 2014, Demand Side Measures Regulation (DSM Regulation) was amended as follows with respect to DSM low income initiatives:
  - Low income program eligibility Low Income Cut-Off threshold raised to 130% of nominal values
  - List of pre-qualified recipients of various government income and housing assistance programs
  - Benefit calculation in the Total Resource Cost cost-effectiveness test for low income programs increased from 130% to 140%

BC Hydro anticipates that 21% of BC Hydro customers are eligible under the DSM Regulation changes (as compared to 11% prior to the changes)



#### TWO BC HYDRO LOW INCOME DSM PROGRAMS

#### 1. Energy Saving Kit Program

• Simple to install energy savings products including compact fluorescent light bulbs, weather-stripping, fridge and freezer thermometers, and high efficiency shower heads

### 2. Energy Conservation Assistance Program

Available to renters and home owners

Eligibility: Annual household income below the following income thresholds							
Household Size	1	2	3	4	5	6	7 or more
Household Income	\$30,800	\$38,300	\$47,100	\$57,200	\$64,800	\$73,100	\$81,400

#### Provides free:

- Personalized home energy evaluation
- Installation of energy saving products by a qualified contractor (Some homes qualify for new Energy Star Fridge and/or insulation upgrades or furnace replacement)
- Personalized energy efficiency advice



## **LOW INCOME RATES**

- In prior RDA workshops, BC Hydro articulated its view that sections 58-61 of the Utilities Commission Act do not allow the BCUC to reduce power rates based on the income level of customers
  - Low income rates likely to be seen as unduly preferential to low income customers or unduly discriminatory to the remaining customers who would be subsidizing the low income rates
- Stakeholders requested review of other individual jurisdiction's legal regime(s) in respect of low income rates or programs
  - Other than Ontario, cost-based ratemaking is the most widely-used standard for evaluating whether rates are 'fair, just and not unduly discriminatory' in Canada
  - Canadian jurisdictions typically offer low income DSM programs, but no rate discounts (e.g., waiver of charges) or specific low income rate designs (low-income energy customers are charged a different rate for electricity) – examples are Manitoba Hydro, Hydro Quebec, New Brunswick Power
  - Nova Scotia Power There is no specific low income rate designs; Nova Scotia Power through section 6.6 of its terms and conditions of service does not require a deposit from customers receiving social assistance or similar types of income security payments unless there is a history of bad credit

Please refer to RDA Workshop 9 Discussion Guide for more information



# PART 2 RESIDENTIAL RATE DESIGN

MODELING ASSUMPTIONS AND PROCESS



## **KEY MODELLING ASSUMPTIONS AND COMMENTS**

Element	Assumptions and Comments						
Fiscal Year Modeled	F2017, F2018, F2019						
Effective Years for Modelling Purposes	New Rates Effective F2017, No Phase-in. F2018 and F2019 Rates escalated by same proportion for all steps to recover revenue (~RRA) for all alternatives except for Pricing Principle Option 2: Apply RRA increases to Step 1						
Billing Data Used	F2013 Customer Billing Data						
Representative Sample	10,000 randomly drawn F2013 customers used where abstraction is needed.						
Precision of values estimated from Sample vs. population	The slight load shape differences between the sample and the load forecast (which takes an average of consumption between F2010 and F2014), yields a precision of about <a href="https://doi.org/10.15/ents/kWh">0.15 cents/kWh</a> (~\$15/year for median BC Hydro Customer).  The precision in cumulative conservation is about 13 GWh (2.8%) in F2017, on Sample vs. SQ.						
Maximum Bill Impact criteria (where required)	10%. Note that bill impact is not a constraint unless specified in the design.  (Inclusive of Revenue Requirements, DARR, rate changes due to rate rebalancing, and rate changes due to rate design)						
Revenue Neutrality	Rates from new models are revenue neutral to SQ target revenue on forecasted load for all years						
LRMC Excludes Capacity and Includes Distribution (D) Loss (6%) and is inflated	Upper End 11.23 c/kWh \$F2017 11.45 c/kWh \$F2018 11.68 c/kWh \$F2019 Equivalent to 10c/kWh + D loss in \$F2013 = 10c/kWh x (1+D Loss) x (1+ F14 Inf.) x (1+F15 fcst) x (1+F16 fcst) x (1+F17 fcst) x (1+F18 fcst) x (1+F19 fcst) = 10c/kwh x (1+6% ) x (1+0.2% ) x (1+1.6% ) x (1+2.0% ) x (1+2.0% ) x (1+2.0% )						

## **SQ RIB RATE EVALUATION**

### **Key Findings of F2009-F2012 Evaluation**

- Three econometric models support current elasticity assumption of -0.1
- Price elasticity generally higher for customer segments with higher consumption
- 50% of residential customers aware of the RIB rate
- RIB rate appears to be achieving its overall objective of encouraging conservation



### **CONSERVATION MODELING** - Forecast model based on most recent evaluation outcomes

Conservation estimates from price response are generally based on

1. Changes in real marginal prices from one year to the next (inflation removed)



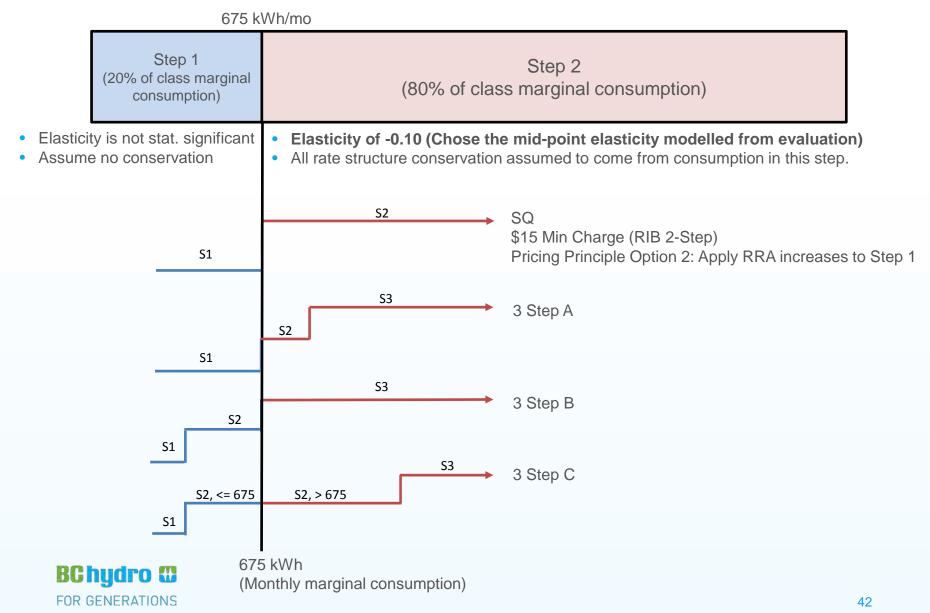
- 2. Forecasted class marginal consumption at each step
- 3. Elasticity as estimated by BC Hydro's Evaluation models (-0.10 for Step 2; Step 1 is inconclusive)

Total Conservation from price response — Natural conservation = Rate Structure Conservation

- Conservation due to general rate increases
- Assumed to have elasticity of -0.05: 2008
   Long-term Acquisition Plan



### **CONSERVATION MODELING** - Applying the Model to Rate Design Alternatives



## **ANALYSIS UNDERTAKEN**

- Rates Simulation, F2017 to F2019
- Bill Impact for F2017, illustrative bills
- Cumulative Bill Impact to F2019, illustrative bills
- Cumulative Conservation

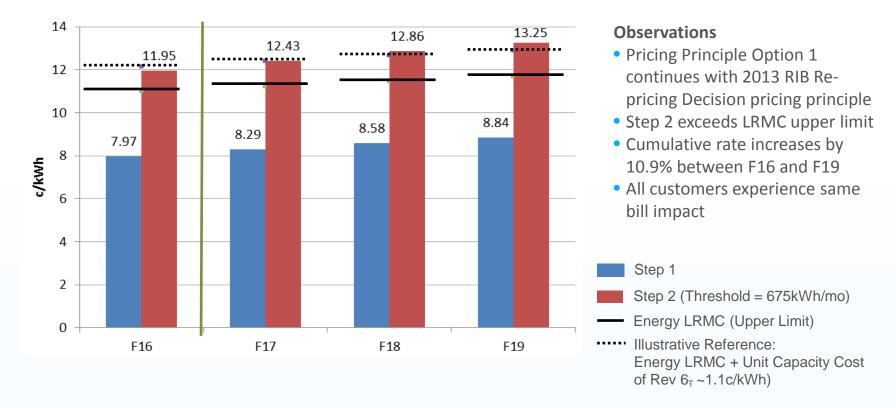


# PART 2 RESIDENTIAL RATE DESIGN

**SQ RIB RATE** 



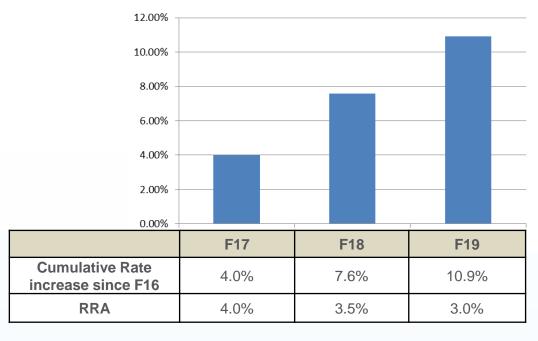
## SQ RIB RATE (PRICING PRINCIPLE OPTION 1: ALL RATE COMPONENTS INCREASE BY RRA)



	F16 Rates Reference	F17	F18	F19
Basic Charge	\$ 0.1764/day	\$ 0.1835/day	\$ 0.1899/day	\$ 0.1956/day
Energy LRMC (Upper Limit)	11.01	11.23	11.45	11.68
Cumulative Conservation since F2008 (GWh)		About 463	About 476	About 488

### **SQ BILL IMPACT**

Cumulative Bill Impacts since F16 under SQ is the same as RRA per 2013 RIB Re-pricing Application



Illustrative Customer Bills (using median kWh of segments from modelling sample)

<b>Customer Segments</b>	Annual kWh	F17	F18	F19
All Customers	8,514	\$852	\$882	\$909
Low Income	6,012	\$594	\$614	\$633
Apartment	4,021	\$420	\$435	\$448
Electric Heat	10,025	\$1,053	\$1,090	\$1,122



FOR GENERATIONS

46

#### BONBRIGHT ASSESSMENT OF SQ RIB RATE STRUCTURE

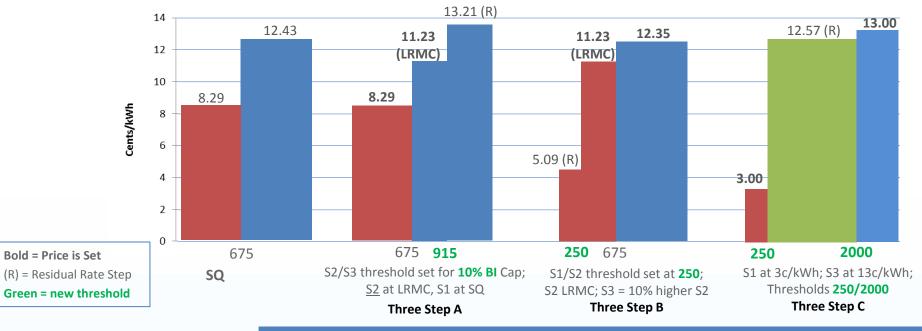
Criteria (1961 Text)	Assessment
Economic Efficiency  Price signals that encourage efficient use and discourage inefficient use (1)	<ul> <li>SQ RIB rate is an economically efficient rate that exposes a majority of residential customers to a price signal set in reference to the energy LRMC</li> <li>Step 2 rate exceeds the upper end of the range of the energy LRMC</li> <li>F17 forecast cumulative conservation = 463 GWh (since 2008)</li> </ul>
Fairness Fair apportionment of costs among customers (2); Avoid undue discrimination (3)	<ul> <li>SQ RIB Step1/Step 2 threshold (675 kWh/month) is generally reflective of typical residential consumption; equal to about 90% of median residential consumption on an ongoing, stable basis</li> <li>Basic Charge recovers about 45% of fixed Distribution and Customer Care costs – in line with other jurisdictions</li> </ul>
Practicality  Customer understanding and acceptance, practical and cost effective to implement (4);  Freedom from controversies as to proper interpretation (5)	<ul> <li>Two-step rate is relatively simple and sends a clear price signal to consumers</li> <li>50 percent of residential customers are aware of the RIB rate, and 80 percent of those customers believe it serves as an incentive to manage electricity consumption</li> <li>Many jurisdictions have two-step inclining block rate for residential customers</li> <li>Recent North West Side Ratepayers Association complaint that Step 2 impacts electrically space heated homes with no alternatives to reduce consumption</li> </ul>
Stability Recovery of the revenue requirement (6); revenue stability (7); rate stability (8)	<ul> <li>RIB rate in place since October 2008</li> <li>Effective in collecting the revenue requirement</li> </ul>

## PART 2 RESIDENTIAL RATE DESIGN

ALTERNATIVE DESIGNS TO THE RIB



#### **THREE STEP RATES F2017**



#### Percent Change in rates by Step (kWh/Month) Vs. F16 Reference

Monthly Consumption	F16 Rates Reference	Status Quo	Three Step A	Three Step B	Three Step C
First 675 kWh/month	7.97 c/kWh	4.0% (RRA)	4.0% (First 675)	-36.2% (First 250)	-62.4% (First 250)
FIISL 073 KVVII/IIIOIILII	7.97 C/KVVII	4.0% (KKA)	4.0% (FIISL 073)	40.9% (250 – 675)	57.7% (250 – 675)
Additional kWh/month	11.95 c/kWh	4.0% (RRA)	-6.0% (675-915)	3.4% (675+)	5.2% (675 – 2000)
Additional KVVII/IIIontii	11.95 C/KVVII	1 4.0% (KKA)	10.6% (915+)	3.4% (075+)	8.8% (2000+)
Basic Charge (\$0.1835/day)	\$0.1764/day	4.0% (RRA)	4.0%	4.0%	4.0%
Cumulative Conservation vs. SQ			+34 GWh	-21 GWh	+19 GWh
Key driver of conservation variance <b>vs. SQ</b>			Higher 3 <sup>rd</sup> Step	Lower 3 <sup>rd</sup> Step	Overall higher marginal prices for consumption >675kW/mo.
Notes				Assumed higher marginal prices under 675kWh/mo. does not impact conservation forecasts because evaluation has found n statistically significant conservation in Step 1	

## THREE STEP RATE F2017 TO F2019

#### **Notes**

- F2018 and F2019 rates are F2017 rates escalated by RRA, for all rate steps
- Shape and differential between steps maintained

#### **Observations**

- S2 and S3 for all options above upper range of LRMC by F2019
- Most bill impacts and conservation outcomes are from a result of rate structure change in F2017

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Three Step Model A	F17	F18	F19	F19 SQ
S1 (c/kWh) Up to 675 kWh/Mo	8.29	8.58	8.84	8.84
<b>S2</b> (c/kWh) 675 – 915 kWh/Mo	11.23	11.62	11.97	13.25
<b>S3</b> (c/kWh) 915+ kWh/Mo	13.21	13.67	14.08	
Basic (\$/day)	0.1835	0.1899	0.1956	0.1956
% Change, Year/Year		3.5%	3.0%	
Cumulative Conservation vs. SQ	+34 GWh	+33 GWh	+33 GWh	

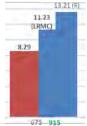
Three Step Model B	F17	F18	F19	F19 SQ
S1 (c/kWh) Up to 250 kWh/Mo	5.09	5.27	5.42	8.84
<b>S2</b> (c/kWh) 250 – 675 kWh/Mo	11.23	11.62	11.97	13.25
<b>S3</b> (c/kWh) 675+ kWh/Mo	12.35	12.79	13.17	
Basic (\$/day)	0.1835	0.1899	0.1956	0.1956
% Change, Year/Year		3.5%	3.0%	
Cumulative Conservation vs. SQ	-21 GWh	-19 GWh	-19 GWh	

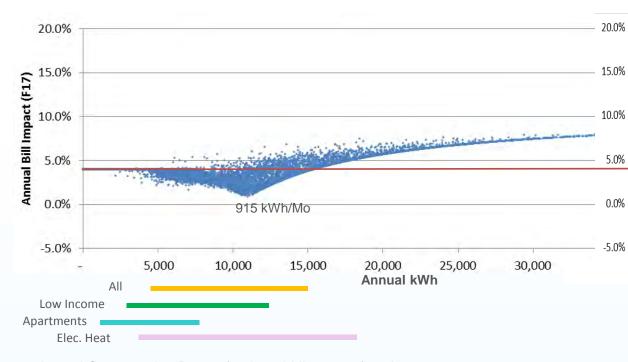
Three Step Model C	F17	F18	F19	F19 SQ
S1 (c/kWh) Up to 250 kWh/Mo	3.00	3.10	3.20	8.84
<b>S2</b> (c/kWh) 250 – 2000 kWh/Mo	12.57	13.01	13.40	13.25
S3 (c/kWh) 2000+ kWh/Mo	13.00	13.46	13.87	
Basic (\$/day)	0.1835	0.1899	0.1956	0.1956
% Change, Year/Year		3.5%	3.0%	
Cumulative Conservation vs. SQ	+19 GWh	+18 GWh	+20 GWh	

### THREE STEP RATE MODEL A (675 / 915)

BILL IMPACT DISTRIBUTIONS F2017

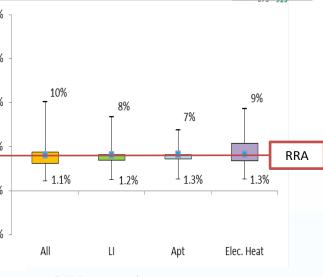






Annual Consumption Range for the middle 60% of each customer segment

Customer Segments Propo off that			Median Bill of Segment	Median Bill Difference from SQ
All Customers		37%	\$841	(\$12)
Low Income		28%	\$594	(\$0)
Apartment		24%	\$420	(\$0)
Electric Heat		31%	\$1,043	(\$10)



Bill Impact of customer segment Color Bar: Middle 60%

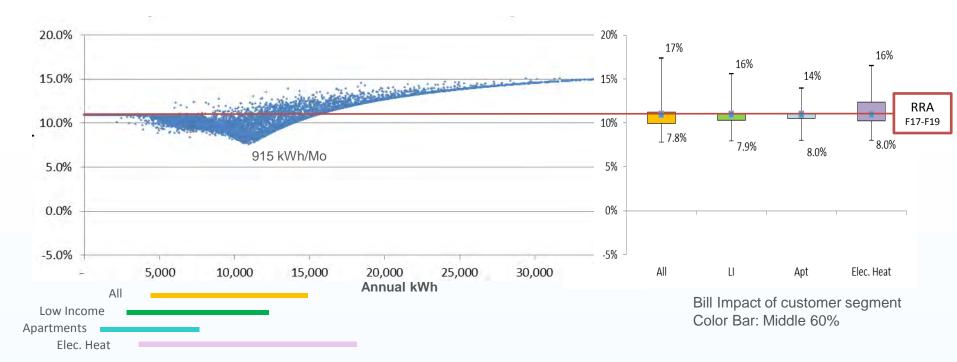
#### **Observations**

- Helps lower bills for customers who have typical consumption
- Max impact = 10% by design (Largest customer)

<sup>\* &</sup>quot;Better off" = at least 1% lower than SQ bill

## THREE STEP RATE MODEL A (675 / 915)

#### CUMULATIVE BILL IMPACT DISTRIBUTIONS TO F2019 (3 YEARS)



Annual Consumption Range for the middle 60% of each customer segment

Customer Segments			Median Bill of Segment	Median Bill Difference from SQ
All Customers		36%	\$896	(\$12)
Low Income		27%	\$633	(\$0)
Apartment		23%	\$448	(\$0)
Electric Heat		30%	\$1,112	(\$11)

#### **Observations**

Similar trend as in F17

<sup>\* &</sup>quot;FOR GENERATIONS \* "Better off" = at least 1% lower than SQ bill

## THREE STEP RATE MODEL B (250 / 675)

BILL IMPACT DISTRIBUTIONS F2017

S1/S2 threshold set at **250**; S2 LRMC; S3 = 10% higher S2

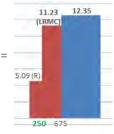
Low Step 1 computed residually

11.3%

-27.3%

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\_ 11.1%



− 10.9%

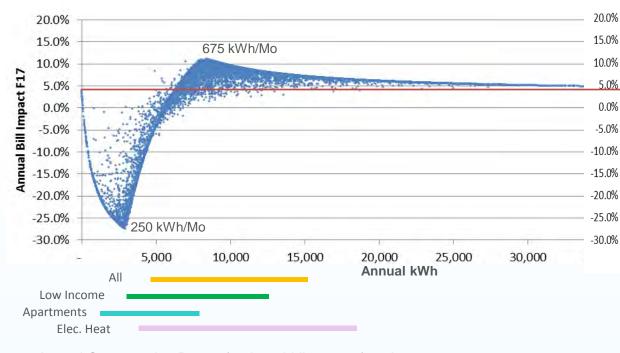
-27.1%

Elec. Heat

RRA

-10.8%

-27.3%



Bill Impact of customer segment Color Bar: Middle 60%

Apt

-26.6%

#### Annual Consumption Range for the middle 60% of each customer segment

Customer Segments	Proportion Better off than SQ	Median Bill of Segment	Median Bill Difference from SQ
All Customers	38	% \$892	\$40
Low Income	52	% \$586	(\$8)
Apartment	77	% \$351	(\$69)
Electric Heat	36	% \$1,089	\$36

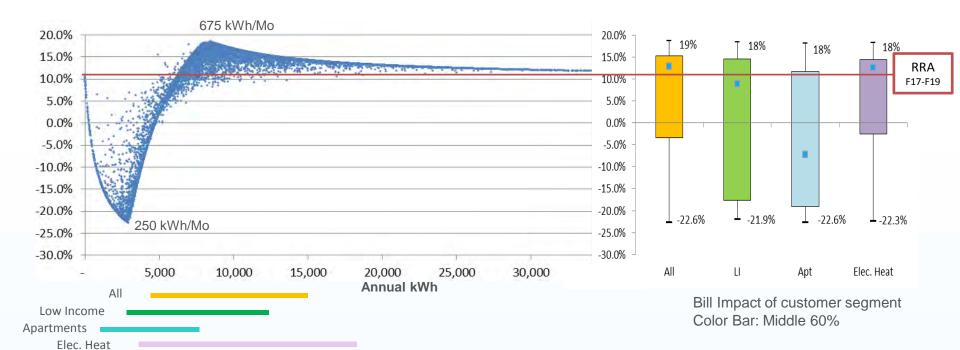
#### \* "FOR GENERATIONS \* "Better off" = at least 1% lower than SQ bill

#### **Observations**

- Bill impact patterns are not directly related to size
- Low S1 reduced bill for customers near the first threshold
- Customers near the median have the highest bill impact because SQ S1 is much lower than the new S2.
- Highly sensitive bill impact

### THREE STEP RATE MODEL B (250 / 675)

## CUMULATIVE BILL IMPACT DISTRIBUTIONS TO F2019 (3 YEARS)



Annual Consumption Range for the middle 60% of each customer segment

Customer Segments	Proportion Bett off than SQ	er Median Bill of Segment	Median Bill Difference from SQ
All Customers	(3)	\$8% \$951	\$42
Low Income	5	\$625	(\$8)
Apartment	7	77% \$374	(\$74)
Electric Heat	(1)	\$6% \$1,161	\$38

#### **Observations**

Same patterns as F17

<sup>\* &</sup>quot;Better off" = at least 1% lower than SQ bill

### THREE STEP RATE MODEL C (250 / 2000)

BILL IMPACT DISTRIBUTIONS F2017

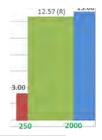
S1 at 3c/kWh; S3 at 13c/kWh; Thresholds **250/2000** 

⊤ 11.6%

**−** 12.2%

-47.9%

Αll



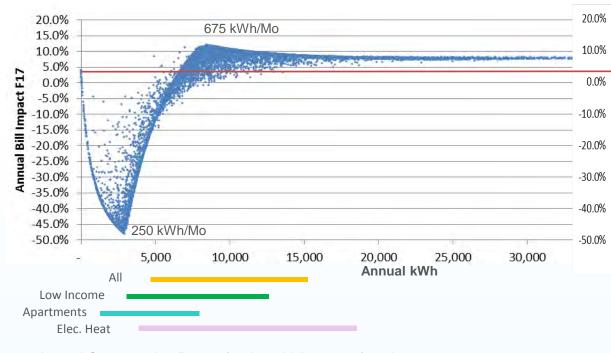
₸ 11.8%

-47.4%

Elec. Heat

RRA (SQ)

⊤ 11.7%



Annual Consumption Range for the middle 60% of each customer segment

Customer Segments	Proporti off than		Median Bill of Segment	Median Bill Difference from SQ
All Customers		42%	\$893	\$40
Low Income		57%	\$562	(\$31)
Apartment		82%	\$300	(\$121)
Electric Heat		40%	\$1,092	\$39

}

Bill Impact of customer segment Color Bar: Middle 60%

Apt

-46.7%

-47.9%

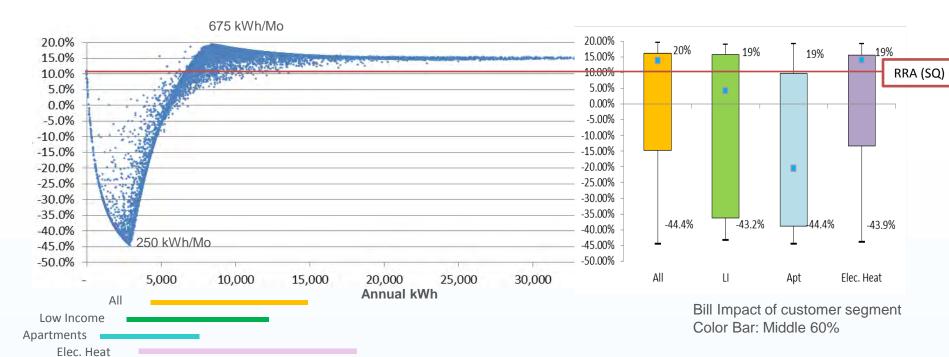
#### **Observations**

- Bill impact patterns are not directly related to size
- Low S1 reduced bills for customers near the first threshold
- Customers near the median have the highest bill impact because SQ S1 is much lower than the new S2.

<sup>\* &</sup>quot;FOR GENERATIONS \* "Better off" = at least 1% lower than SQ bill

#### THREE STEP RATE MODEL C (250 / 2000)

#### CUMULATIVE BILL IMPACT DISTRIBUTIONS TO F2019 (3 YEARS)



Annual Consumption Range for the middle 60% of each customer segment

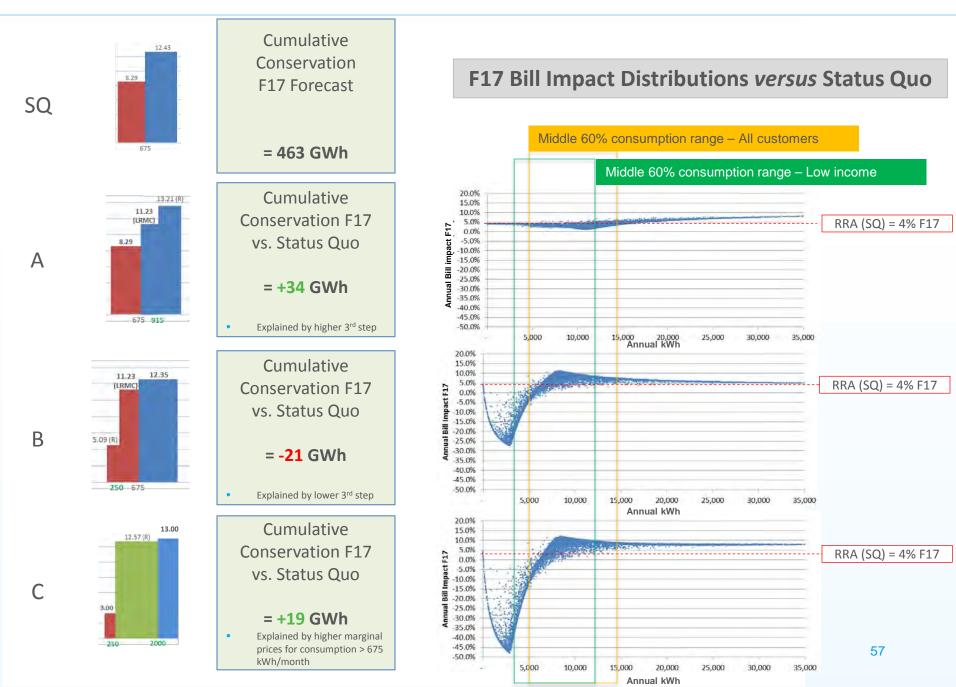
Customer Segments	Proport off than		Median Bill of Segment	Median Bill Difference from SQ
All Customers		42%	\$952	\$43
Low Income		58%	\$600	(\$33)
Apartment		82%	\$319	(\$129)
Electric Heat		40%	\$1,164	\$42

FOR GENERATIONS 'Better off" = at least 1% lower than SQ bill

#### **Observations**

Same patterns as F17

#### PART 2 - ALTERNATIVE DESIGNS TO THE RIB THREE STEP RATE OPTIONS - SUMMARY



## **THREE STEP RATES**

### Summary

Criteria	Comments
<b>Economic Efficiency</b>	<ul> <li>Step 3 &gt; LRMC, but small differences overall compared to RIB price signal</li> <li>Negligible changes in conservation, within uncertainty range of elasticity estimates</li> </ul>
Fairness	<ul> <li>Model A:</li> <li>Highest bill impacts to larger consumers (up to 10%)</li> <li>Typical customers in the range of median consumption: lowest bill impacts</li> <li>Impacts are generally low; small differences overall compared to SQ RIB</li> <li>Models B &amp; C</li> <li>Typical customers in the range of median consumption: highest bill impacts</li> <li>Low/very low consuming customers benefit; not necessarily low income</li> <li>New thresholds are arbitrary</li> </ul>
Practicality	<ul> <li>Decrease in customer understanding</li> <li>Increase in administration complexity</li> </ul>
Stability	<ul> <li>May increase revenue uncertainty</li> <li>Increase in rate setting uncertainty</li> </ul>



### **OPTIONS TO CARRY FORWARD TO 2015 RDA FILING**

	Economic Efficiency	Fairness	Practicality	Stability
SQ RIB Rate  BC Hydro Preferred Option	<ul> <li>Exposes a majority of residential customers to a LRMC price signal</li> <li>Step 2 rate currently exceeds the upper end of range of the energy LRMC</li> <li>F17 forecast cumulative conservation = 463 GWh (since 2008)</li> </ul>	675 kWh/month threshold is generally reflective of typical residential consumption; equal to about 90% of median residential consumption on an ongoing, stable basis	<ul> <li>Relatively simple</li> <li>50 percent of residential customers are aware of the RIB rate, and 80 percent of those customers believe it serves as an incentive to manage electricity consumption</li> <li>Many jurisdictions have two-step inclining block rate for residential customers</li> </ul>	RIB rate in place since October 2008
3-Step Rate	Worse than SQ	Worse than SQ	Worse than SQ	Worse than SQ
BC Hydro proposes no further modeling of Models A, B or C and asks for stakeholder comment	No basis to deliberately set in isolation a Step 3 rate to further exceed LRMC Relatively small increase or decrease in conservation compared to SQ, depending on design; an outcome more of price level than rate structure	<ul> <li>No basis to target bill savings to median and lower consuming customers through higher rates charged to average and higher consuming customers</li> <li>New thresholds are arbitrary</li> </ul>	<ul> <li>Adds complexity - and may be seen as attempt to hide rate increases (focus groups)</li> <li>Only one Canadian jurisdiction - Yukon Electric - has a 3-step rate</li> <li>California utilities seeking to reduce number of rate tiers</li> </ul>	A move from SQ rates degrades rate stability particularly when SQ rates are generally performing well

## THANK YOU

## **SEND COMMENTS TO:**

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