

Chris Sandve

Chief Regulatory Officer

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June 30, 2021

Mr. Patrick Wruck
Commission Secretary and Manager
Regulatory Support
British Columbia Utilities Commission
Suite 410, 900 Howe Street
Vancouver, BC V6Z 2N3

Dear Mr. Wruck:

**RE: British Columbia Utilities Commission (BCUC or Commission)
British Columbia Hydro and Power Authority (BC Hydro)
Customer Crisis Fund Program Amendments Application (2021)
(Application)**

BC Hydro writes to provide its responses to Commission Staff Information Request No. 1.

For further information, please contact Anthea Jubb at 604-623-3545 or by email at bchydroregulatorygroup@bchydro.com.

Yours sincerely,



Chris Sandve
Chief Regulatory Officer

ch/rh

Enclosure

British Columbia Utilities Commission Staff Information Request No. 1.1.1 Dated: June 28, 2021 British Columbia Hydro & Power Authority Response issued June 30, 2021	Page 1 of 2
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**1.0 Reference: CUSTOMER CRISIS FUND PROGRAM
British Columbia Hydro and Power Authority, Customer
Crisis Fund Program Amendments Application, pp. 1, 3–4;
Appendix D, OIC 365
CCF Regulatory Account**

Provision 3 of Order in Council (OIC) 365 states:

- (1) The commission must allow the authority to defer to the customers crisis fund regulatory account
 - (a) The amounts incurred by the authority in administering the Customer Crisis Fund program, and
 - (b) Grants provided to residential customers under the Customer Crisis Fund program.
- (2) The total amount deferred under subsection (1) must not exceed \$5 million.

On page 1 of the British Columbia Hydro and Power Authority (BC Hydro) Customer Crisis Fund (CCF) Program Amendments Application (Application), BC Hydro outlines the requested approvals, which include:

Pursuant to section 3 of the Direction, approve BC Hydro to defer, to the Customer Crisis Fund (CCF) Regulatory Account approved pursuant to BCUC Order No. G-166-17, variances between forecast and actual amounts incurred by BC Hydro in administering the Customer Crisis Fund Program as well as the grant amounts provided to BC Hydro Residential Service Customers (as defined in BC Hydro’s Electric Tariff) that qualify to receive a grant under the Customer Crisis Fund Program, up to a maximum amount of \$5 million (together, the Deferred Amounts).

On page 4 of the Application, BC Hydro submits:

Pursuant to the Direction, BC Hydro seeks approval to defer to the Customer Crisis Fund Regulatory Account, the Deferred Amounts, to a maximum of \$5 million. Since no amounts were forecast for the Customer Crisis Fund Program in fiscal 2022, all amounts incurred will be deferred as variances. BC Hydro intends to address the disposition of the existing amounts in the CCF Regulatory Account in the Fiscal 2023 to Fiscal 2025 Revenue Requirements Application.

- 1.1.1 Please clarify if the “forecast” referred to on page 1 of the Application means BC Hydro’s revenue requirement used in setting approved rates for any given year.

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RESPONSE:

Confirmed. The Fiscal 2022 Revenue Requirements Application did not include costs to operate a crisis fund program in fiscal 2022 beyond the completion of the Customer Crisis Fund pilot program. Moreover, BC Hydro will not include any forecast of grants to customers nor its internal incremental costs to administer the Customer Crisis Fund Program in its upcoming Fiscal 2023 to Fiscal 2025 Revenue Requirements Application.

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1.0 Reference: CUSTOMER CRISIS FUND PROGRAM
British Columbia Hydro and Power Authority, Customer Crisis Fund Program Amendments Application, pp. 1, 3–4; Appendix D, OIC 365
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- 1.1.2 If the CCF Program continues in fiscal 2023, please clarify if BC Hydro intends to a) include forecast costs for administering the CCF Program and issuing grants in its revenue requirements and to record variances between forecast and actual costs in the CCF

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Regulatory Account, or b) continue to forecast \$nil for the program costs and record all program costs in the CCF Regulatory Account, or c) some other method of recording program costs. If c), please describe the method.

RESPONSE:

Please refer to BC Hydro’s response to BCUC Staff IR 1.1.1, in which we note that BC Hydro does not intend to include any forecast of grants to customers nor its incremental costs to administer the program in the upcoming Fiscal 2023 to Fiscal 2025 Revenue Requirements Application. As a result, all grants to customers and any incremental costs to administer the program will be recorded in the CCF Regulatory Account.

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**1.0 Reference: CUSTOMER CRISIS FUND PROGRAM
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- 1.1.2.1 If BC Hydro is proposing to include forecast costs for administering the CCF Program and issuing grants in its revenue requirements and to record variances between forecast and actual costs in the CCF Regulatory Account, please discuss BC Hydro’s

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position as to whether this is consistent with provision 3 of OIC 365.

RESPONSE:

Not applicable. Please refer to BC Hydro's response to BCUC Staff IR 1.1.2.

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1.0 Reference: CUSTOMER CRISIS FUND PROGRAM
British Columbia Hydro and Power Authority, Customer Crisis Fund Program Amendments Application, pp. 1, 3–4; Appendix D, OIC 365
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- 1.1.3 Please provide the most current CCF Regulatory Account balance, broken down between CCF revenue, CCF Pilot Program costs, CCF Program costs, net CCF costs and the COVID-19 relief measures.

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RESPONSE:

Please refer to the table below.

**Customer Crisis Fund Regulatory Account Balance
as of May 31, 2021**

	(\$ million)
Revenue from CCF Rate Rider	(11.9)
Interest on CCF Portion	(0.2)
Less:	
CCF Pilot Set-up Costs	0.3
CCF Pilot Operating Costs	1.6
CCF Grants	4.3
Subtotal: Balance after CCF Pilot Program Including Interest	(5.9)
Less:	
COVID-19 Relief Program Credits	37.3
COVID-19 Relief Program Administration	1.1
Interest on COVID Relief Portion	1.3
Customer Crisis Fund Regulatory Account Balance Including Interest	33.8

As shown in the table:

CCF revenue (including interest)	\$11.9M + \$0.2M	\$(12.1)M
CCF Pilot Program costs (including grants to customers)	\$0.3M + \$1.6M + \$4.3M	\$6.2M
CCF Program costs		\$0.0M
Net CCF revenues		\$5.9M
COVID-19 relief measures	\$37.3M + \$1.1M + \$1.3M	\$39.7M
CCF Regulatory Account balance	\$39.7M - \$5.9M	\$33.8M

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- 1.1.4 Please clarify if the CCF Program will be funded by residential ratepayers only or if there may be any program costs funded by other rate classes.

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RESPONSE:

The \$5.9 million surplus in the CCF Regulatory Account arose from CCF pilot program revenues exceeding CCF pilot program costs. CCF pilot program revenues were funded entirely by residential customers. The CCF rate rider has been rescinded and no additional funding is required.

Notwithstanding the above, BC Hydro notes that pursuant to section 4 of Direction to the British Columbia Utilities Commission Regarding COVID-19 Relief (Order in Council No. 159 issued April 2, 2020), the Commission must allow BC Hydro to recover the balance in the CCF Regulatory Account from all customers.

Should there be a remaining balance in the account following the Customer Crisis Fund Program, BC Hydro expects that it will apply for recovery of any such balance at that time unless the result is a permanent program that is to be funded by BC Hydro's ratepayers. If there is a permanent program, it may be appropriate to leave any such balance to help "fund" the permanent program since residential ratepayers "funded" that balance and would be the ones benefitting from any permanent program.

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**2.0 Reference: CUSTOMER CRISIS FUND PROGRAM
 Application, pp. 3–4; CCF Pilot Program Two-Year Evaluation
 Report, pp. 25–26
 CCF Program Costs**

On page 3 of the Application, BC Hydro submits:

The Customer Crisis Fund Program will follow the same processes, eligibility requirements, and grants as were established for the CCF pilot program. Since no amounts were forecast in fiscal 2022 for the new Customer Crisis Fund Program, all marketing, administration and program management costs, as well as Customer Crisis Fund grants, will be deferred to the CCF Regulatory Account. Any CCF Returns (as defined in the Electric Tariff amendments) will be credited to the CCF Regulatory Account.

Table 7 and Table 8 in the CCF Two-Year Evaluation Report include the CCF Pilot Program operating costs by cost category and the CCF Pilot Program participation results, respectively.¹

- 1.2.1 Please provide the forecast annual operating costs of the CCF Program, in the same format as Table 7 of the CCF Two-Year Evaluation Report. Please include an additional cost category for marketing costs.

RESPONSE:

Please see the table below.

**Estimated Customer Crisis Fund Program Operating
 Costs for F2022-F2023**

	F22 Program Estimate (9 months) (\$)	F23 Program Estimate (9 months) (\$)	Total Program Estimate (\$)
Program Management	18,750	18,750	37,500
Administration and Adjudication	300,000	300,000	600,000

¹ BC Hydro CCF Pilot Program Evaluation Report, Exhibit B-5, https://www.bcuc.com/Documents/Proceedings/2020/DOC_58856_B-5-BCH-CCF-Evaluation-Report-Year-2.pdf

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	F22 Program Estimate (9 months) (\$)	F23 Program Estimate (9 months) (\$)	Total Program Estimate (\$)
Information Technology Systems	0	0	0
Training	500	500	1,000
Program Evaluation	0	0	0
Community Service Organizations Application Support	37,500	37,500	75,000
Marketing	0	0	0
Total Estimated Operating Costs	356,750	356,750	713,500

As shown in the table above, BC Hydro estimates that its incremental operating costs to administer the program will be \$356,750 in each of fiscal 2022 and fiscal 2023 for an estimated total of \$713,500 over the two fiscal years.

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2.0 Reference: CUSTOMER CRISIS FUND PROGRAM Application, pp. 3–4; CCF Pilot Program Two-Year Evaluation Report, pp. 25–26 CCF Program Costs

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The Customer Crisis Fund Program will follow the same processes, eligibility requirements, and grants as were established for the CCF pilot program. Since no amounts were forecast in fiscal 2022 for the new Customer Crisis Fund Program, all marketing, administration and program management costs, as well as Customer Crisis Fund grants, will be deferred to the CCF Regulatory Account. Any CCF Returns (as defined in the Electric Tariff amendments) will be credited to the CCF Regulatory Account.

Table 7 and Table 8 in the CCF Two-Year Evaluation Report include the CCF Pilot Program operating costs by cost category and the CCF Pilot Program participation results, respectively.¹

- 1.2.1.1 Please clarify if there will be any setup costs associated with the CCF Program, and if so, please provide an estimate of the setup costs.

RESPONSE:

BC Hydro does not expect to incur any additional setup costs associated with the Customer Crisis Fund Program.

¹ BC Hydro CCF Pilot Program Evaluation Report, Exhibit B-5, https://www.bcuc.com/Documents/Proceedings/2020/DOC_58856_B-5-BCH-CCF-Evaluation-Report-Year-2.pdf

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Table 7 and Table 8 in the CCF Two-Year Evaluation Report include the CCF Pilot Program operating costs by cost category and the CCF Pilot Program participation results, respectively.¹

- 1.2.1.2 Please describe any marketing activities that will be undertaken for the CCF Program and quantify any one-time expenses associated with marketing the program, if possible.

RESPONSE:

Like the CCF pilot program, awareness of the Customer Crisis Fund Program will be generated through the network of delivery partners, BC Hydro existing communications (e.g., bills; collection notices) and through social media. BC Hydro does not expect to incur any incremental costs associated with these “marketing” activities.

¹ BC Hydro CCF Pilot Program Evaluation Report, Exhibit B-5, https://www.bcuc.com/Documents/Proceedings/2020/DOC_58856_B-5-BCH-CCF-Evaluation-Report-Year-2.pdf

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Table 7 and Table 8 in the CCF Two-Year Evaluation Report include the CCF Pilot Program operating costs by cost category and the CCF Pilot Program participation results, respectively.¹

1.2.2 Please provide the forecast participation information and grants for the CCF Program, if possible, in the same format as Table 8 of the CCF Two-Year Evaluation Report.

RESPONSE:

Please refer to the table below.

Estimated CCF Pilot Participation Totals for F22-F23

	F22 Customer Crisis Fund Program Estimate (9 months)	F23 Customer Crisis Fund Program Estimate (9 months)	Total Customer Crisis Fund Program Estimate
Grant Applications Received	7,500	7,500	15,000
Grants Provided	2,300	2,300	4,600
Average Grant Amount (Net of Reversals After Audit) (\$)	413	413	413

¹ BC Hydro CCF Pilot Program Evaluation Report, Exhibit B-5, https://www.bcuc.com/Documents/Proceedings/2020/DOC_58856_B-5-BCH-CCF-Evaluation-Report-Year-2.pdf

British Columbia Utilities Commission Staff Information Request No. 1.2.2 Dated: June 28, 2021 British Columbia Hydro & Power Authority Response issued June 30, 2021	Page 2 of 2
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	F22 Customer Crisis Fund Program Estimate (9 months)	F23 Customer Crisis Fund Program Estimate (9 months)	Total Customer Crisis Fund Program Estimate
Total Grants (\$)	950,000	950,000	1,900,000
Total Operating Costs (\$)	356,750	356,750	713,500
Total Program Costs (\$)	1,315,750	1,315,750	2,631,500

As shown in the table, BC Hydro estimates that the Program will result in 4,600 grants being provided to customers at a total cost of \$1.9 million. Adding the operating costs (which are detailed in BC Hydro's response to BCUC Staff IR 1.2.1), the total estimated program costs are \$2,631,500. BC Hydro notes that both the number and dollar amount of grants, and its estimated operating costs, are estimates only and will vary from what actually occurs.

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 CCF Program Costs**

On page 4 of the Application, BC Hydro submits:

BC Hydro closed the CCF pilot program to new applications on May 31, 2021 in accordance with Order No. G-144-21. However, BC Hydro has received approximately 200 grant applications under the new Customer Crisis Fund Program which became available on June 1, 2021. BC Hydro’s obligation to process these applications is subject to the approval by the BCUC of the Electric Tariff amendments to enable BC Hydro to process these grants by way of on-bill credits and to defer the Deferred Amounts, both in accordance with the Direction.

1.2.3 Please explain if BC Hydro has incurred costs in administering the CCF Program since its establishment on June 1, 2021, and provide an estimate of costs incurred, if possible.

RESPONSE:

To reduce the impact to customers of the time between the end of the CCF pilot program and the Order in Council from Government, BC Hydro began to review applications for the Customer Crisis Fund Program once OIC No. 365 was issued on June 21, 2021.

BC Hydro anticipates that it will have spent approximately \$5,000 on processing applications for the Customer Crisis Fund Program prior to receiving the BCUC’s approval of this application.

BC Hydro confirms that it has not begun to issue credits for approved Customer Crisis Fund Program applications pending the outcome of this proceeding.

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- 1.2.3.1 For any costs that have been incurred in administering the CCF Program since June 1, 2021, please discuss how these costs will be accounted for and recovered.

RESPONSE:

As described in BC Hydro’s response to BCUC Staff IR 1.2.3, BC Hydro began reviewing applications for the Customer Crisis Fund Program once OIC No. 365 was issued. Incremental administration costs associated with this activity will be charged to the Customer Crisis Fund Regulatory Account pending approval of the Application by the BCUC in this proceeding.

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3.0 Reference: CUSTOMER CRISIS FUND PROGRAM Application, p. 3 CCF Program End Date

BC Hydro submits on page 3 of the Application that:

The [CCF] Program does not have a defined end date; however, it is anticipated that it will operate for approximately 18 months. BC Hydro expects that this time frame will be sufficient for the Government of B.C. to complete a policy review to determine whether a permanent program is appropriate, how it may be implemented, and how it may be funded. If the \$5 million limit of amounts to be deferred to the CCF Regulatory Account is reached before establishment of a permanent program, BC Hydro will discontinue processing Customer Crisis Fund Program applications.

- 1.3.1 Please discuss how BC Hydro arrived at the estimated timeframe of 18 months for the CCF Pilot Program, with reference to historic actual program costs for the CCF Pilot Program and forecast costs for the CCF Program.

RESPONSE:

The 18-month timeframe is the anticipated duration of the policy review that will be undertaken by the Government of B.C. and the time required to implement a permanent program, should one result from the review. The 18-month timeframe does not relate to actual costs of the CCF Pilot Program, nor to the estimated costs for the new Customer Crisis Fund Program.

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- 1.3.2 Please describe BC Hydro’s position as to whether it is required to discontinue processing CCF Program applications if the \$5 million limit is reached, pursuant to OIC 365.

RESPONSE:

BC Hydro does not anticipate that the \$5 million limit will be reached given that the expected costs for the Customer Crisis Fund Program for an 18-month period are \$2.6 million, as shown in BC Hydro’s response to BCUC Staff IR 1.2.2.

This notwithstanding, BC Hydro expects that application processing for the Customer Crisis Fund Program would cease if the \$5 million limit is reached.

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4.0 Reference: CUSTOMER CRISIS FUND PROGRAM Application, Appendix D, OIC 365 Tariff

Provision 4(2) of OIC 365 states that “The commission may not amend, cancel or suspend the rates set out in the amendments made under subsection (1), except on application by the authority.”

Section 1(1) of the *Utilities Commission Act* (UCA) includes the definition of “rate”, as follows:

"rate" includes

- (a) a general, individual or joint rate, fare, toll, charge, rental or other compensation of a public utility,
- (b) a rule, practice, measurement, classification or contract of a public utility or corporation relating to a rate, and
- (c) a schedule or tariff respecting a rate;

1.4.1 Please identify the BC Hydro “rates” referred to in provisions (1) and 4(2) of OIC 365, with reference to the definition of “rate,” as outlined in section 1 the UCA.

RESPONSE:

The rates referred to in section 4(1) of the Direction are the changes to BC Hydro’s Electric Tariff as shown in Appendix 1 to the Direction which enable grants to be paid (and reversed if required) on customer bills as opposed to by way of cheques (and invoices). Section 4(2) of the Direction is directing the BCUC to not amend the Electric Tariff provisions relating to the Customer Crisis Fund Program contained in BC Hydro’s Electric Tariff.

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British Columbia Hydro & Power Authority BC Hydro Customer Crisis Fund Program Amendments Application	

5.0 Reference: CUSTOMER CRISIS FUND PROGRAM Application, p. 1 CCF Pilot Program Applications

On page 1 of the Application, BC Hydro outlines the requested approvals, which include:

Approval to advance the effective date of the amendments to BC Hydro's Electric Tariff that were approved through Directive 2 of BCUC Order No. G-179-21A so that they become effective on the same date and immediately prior to the requested additions to BC Hydro's Electric Tariff set out in paragraph 2 below, rather than September 1, 2021

- 1.5.1 For any CCF Pilot Program applications received before May 31, 2021 but not yet processed, please explain under which program these applications will be administered (i.e. CCF Pilot Program or CCF Program).

RESPONSE:

All applications received on or before May 31, 2021 but not yet processed will be administered under the CCF Pilot Program.