



**Fred James**

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November 6, 2019

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)  
Transmission Service Market Reference-Priced Rates Application**

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BC Hydro writes to file corrections to its Transmission Service Market Reference-Priced Rates Application (**Application**), filed on October 31, 2019. BC Hydro discovered a typographic error as well as data that had inadvertently not been updated in the Application. These corrections are enclosed as Errata No. 1.

For further information, please contact Anthea Jubb at 604-623-3545 or by email at [bchydroregulatorygroup@bchydro.com](mailto:bchydroregulatorygroup@bchydro.com).

Yours sincerely,

A handwritten signature in black ink that reads "Anthea Jubb". The signature is fluid and cursive, with the first name "Anthea" being more prominent than the last name "Jubb".

(for) Fred James  
Chief Regulatory Officer

jc/rh

Enclosure

Copy to: Interveners that attended the October and November 2018 Workshops.

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## **Transmission Service Market Reference Priced Rates Application**

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### **ERRATA – November 6, 2019**

<b>REMOVE</b>	<b>INSERT</b>	<b>NOTE</b>
Application - Page 67	Page 67 – Revision 1 – November 6, 2019	1
Application - Page 78	Page 78 – Revision 1 – November 6, 2019	2
Application - Page 79	Page 79 – Revision 1 – November 6, 2019	3

**Notes:**

1. Figure 17 provides an illustrative example of the baseline determination for Rate Schedule 1893. The referenced period is April 1, 2018 – March 31, 2018 but should indicate the period of April 1, 2018 – March 31, 2019, which is the period provided in the monthly breakdown.
2. Table 10 provides the expected incremental load and expected incremental load net revenue results for Option 2B, a shaped adder that averages \$7.00 per MWh. The incorrect results had been provided in the Application and are now updated with the correct results.
3. Table 13 provides a summary of the expected incremental net revenue for the six adder options, but transposed the adder amounts. Options 1A and 1B should be an adder of \$8.00 per MWh instead of \$6.00 per MWh (as shown in the analysis results provided in Tables 7 and 8). Options 3A and 3B should be an adder of \$6.00 per MWh instead of \$8.00 per MWh (as shown in the analysis results provided in Tables 11 and 12). The summary results provided in Table 13 properly show the analysis for each option.

service for any event of forced or planned generator outage. The Customer must wait until March 1 before being eligible to re-enrol in the Incremental Energy Rate Pilot.

#### RS 1893 Baseline Determination

For a Customer with at least two years of consumption history, the default period for determining HLH and LLH Baselines and Monthly Reference Demand will be the 365 days of BC Hydro's fiscal 2019.<sup>40</sup> A unique HLH and LLH Baseline and Monthly Reference Demand will be determined for each Billing Period of Fiscal 2019. This will result in 36 unique baselines (one HLH Baseline, one LLH Baseline and one Monthly Reference Demand for each of the 12 Billing Periods). An illustrative example of the baselines that will be determined for a Customer is provided in [Figure 17](#) below.

**Figure 17 Illustrative Monthly RS 1893 Energy and Demand Baselines**

BC Hydro - RS 1893 Baselines for Incremental Energy Rate						RS 1893 Energy and Demand Baselines		
Customer: ABC Pulp & Paper						RS 1893- Monthly HLH & LLH Baselines		
Site: ABC Pulp & Paper						RS1893 Reference Demand		
Account(s): 12345								
Period: April 1, 2018 - March 31, 2019								
Month	(A) Sum of hourly HLH interval data (kWh)	(B) # of HLH Hours	(C) Sum of hourly LLH interval data (kWh)	(D) # of LLH Hours	(E) Total Billed RS1823 Energy (kWh)	(F) HLH Energy Baselines (kWh/hr) = (A/B)	(G) LLH energy Baselines (kWh/hr) = (C/D)	(H) Monthly Reference Demand (kVA) = <i>actual</i> <i>billed demand</i>
Apr-18	22,820,352	384	19,172,008	336	41,992,360	59,428	57,060	66,158
May-18	18,632,155	416	15,232,399	328	33,864,554	44,789	46,440	53,198
Jun-18	18,255,455	416	14,776,179	304	33,031,634	43,883	48,606	53,198
Jul-18	18,100,122	400	16,536,045	344	34,636,167	45,250	48,070	53,198
Aug-18	24,442,880	416	20,384,090	328	44,826,970	58,757	62,147	65,630
Sep-18	24,088,453	400	19,586,980	320	43,675,433	60,221	61,209	64,072
Oct-18	19,793,080	400	16,166,932	344	35,960,012	49,483	46,997	64,336
Nov-18	24,937,651	400	20,832,295	321	45,769,946	62,344	64,898	65,973
Dec-18	24,750,890	400	21,105,322	344	45,856,212	61,877	61,353	64,416
Jan-19	24,309,628	416	20,810,284	328	45,119,912	58,437	63,446	66,158
Feb-19	19,342,677	368	17,418,004	304	36,760,681	52,562	57,296	63,967
Mar-19	22,576,143	416	18,810,399	327	41,386,542	54,270	57,524	65,419

<sup>40</sup> Fiscal 2019 is the most recent fiscal year for which customers have a final Energy CBL that has been filed with and approved by the BCUC. This will ensure alignment of RS 1893 energy baselines with the customer's annual Energy CBL determined in accordance with TS 74.

**Table 10 Option 2B – Shaped Adder in Non-freshet months that averages \$7/MWh**

RESULTS (all values on a per year basis):		
Expected Incremental Load Net Revenue	<del>1445</del> <b>1293</b>	kCAD
10th Percentile Net Revenue	<del>-85</del> <b>-275</b>	kCAD
50th Percentile Net Revenue	<del>1436</del> <b>1281</b>	kCAD
90th Percentile Net Revenue	<del>2986</del> <b>2847</b>	kCAD
Expected Incremental Load	<del>263</del> <b>265</b>	GWh
10th Percentile Incremental Load	<del>239</del> <b>243</b>	GWh
50th Percentile Incremental Load	<del>268</del> <b>272</b>	GWh
90th Percentile Incremental Load	<del>280</del> <b>281</b>	GWh

**Table 11 Option 3A – Flat \$6/MWh Adder in Non-freshet months**

RESULTS (all values on a per year basis):

Expected Incremental Load Net Revenue	1150	<u>kCAD</u>
10th Percentile Net Revenue	-460	<u>kCAD</u>
50th Percentile Net Revenue	1122	<u>kCAD</u>
90th Percentile Net Revenue	2719	<u>kCAD</u>
Expected Incremental Load	268	<u>GWh</u>
10th Percentile Incremental Load	246	<u>GWh</u>
50th Percentile Incremental Load	274	<u>GWh</u>
90th Percentile Incremental Load	283	<u>GWh</u>

**Table 12 Option 3B – Shaped Adder in Non-freshet months that averages \$6/MWh**

RESULTS (all values on a per year basis):		
Expected Incremental Load Net Revenue	1131	kCAD
10th Percentile Net Revenue	-465	kCAD
50th Percentile Net Revenue	1110	kCAD
90th Percentile Net Revenue	2696	kCAD
Expected Incremental Load	267	GWh
10th Percentile Incremental Load	246	GWh
50th Percentile Incremental Load	273	GWh
90th Percentile Incremental Load	283	GWh

#### 5.5.4 BC Hydro's Energy Charge Adder Proposal

In general, based on the initial modeling of ratepayer impact, BC Hydro is financially indifferent on an annualized expected revenue basis as between the flat and shaped adder pricing alternative for each option (i.e., as between Option A and Option B). That is, the forecast net revenue is similar in either case. Further, the forecast revenue differences between Options 1, 2 and 3 are not substantial, as shown in [Table 13](#) below.

**Table 13 Summary of Expected Net Revenue by Adder Option**

ENERGY CHARGE ADDER ALTERNATIVES	ADDER (\$/MWh)	Expected Incremental Load (GWh)	Expected Incremental Net Revenue (\$M)
Option 1A - Flat	<del>\$6.00</del> 8.00	264	\$ 1.47
Option 1B - Shaped		263	\$ 1.45
Option 2A - Flat	\$ 7.00	266	\$ 1.32
Option 2B - Shaped		265	\$ 1.29
Option 3A - Flat	<del>\$8.00</del> 6.00	268	\$ 1.12
Option 3B - Shaped		267	\$ 1.13

BC Hydro's proposal in this application is to proceed with Option 2A, which uses a flat energy charge adder of \$7/MWh in non-freshet months and a flat \$3/MWh energy charge adder of \$3/MWh in freshet months. This option reflects AMPC's proposal and is generally consistent with customer feedback requesting simplicity in adder pricing.

Based on the assumptions provided, for energy charge adder Option 2A:

- Expected incremental RS 1893 energy sales are 266 GWh per year and expected net revenue to BC Hydro is approximately \$1.3 million per year;
- At the 10<sup>th</sup> percentile, there is a 10 per cent chance that BC Hydro would see a forecast annual net revenue loss of approximately (\$0.3 million) or more for approximately 243 GWh of incremental energy sales; and