

Fred James

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Via email: info@riversideenergy.ca; ben@riversideenergy.ca

December 9, 2019

Ben Giudici
Riverside Energy Systems
c/o PO Box 123 Fulford Harbour
Kamloops BC V2C 5P4

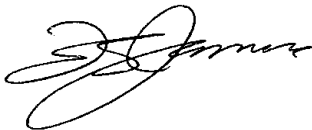
Dear Mr. Giudici:

**RE: Project No. 1599004
British Columbia Utilities Commission (BCUC or Commission)
British Columbia Hydro and Power Authority (BC Hydro)
Application to Amend Net Metering Service under Rate Schedule 1289
Information Request to Riverside Energy Systems (RIVERSIDE ENERGY)
Evidence**

BC Hydro writes in compliance with BCUC Order No. G-293-19 to provide its Information Request on RIVERSIDE ENERGY Evidence (Exhibit C13-2).

For further information, please contact Chris Sandve at 604-974-4641 or by email at bchydroregulatorygroup@bchydro.com.

Yours sincerely,



Fred James
Chief Regulatory Officer

bh/ma

Enclosure

Copy to: **British Columbia Utilities Commission**
Attention: Commission Secretary
Commission.Secretary@bcuc.com

British Columbia Hydro and Power Authority
Information Request No. 1 to
Riverside Energy Systems (RIVERSIDE ENERGY)

Project No. 1599004

Application to Amend Net Metering Service under Rate Schedule 1289

- 1.0 BC Hydro states that the amendments proposed in the Application would, among other things, “Exempt Generating Facilities with a capacity size of 5 kW or less from the requirement to have an estimated Annual Energy Output no greater than 110 per cent of the customer’s estimated Annual Load.”¹

BC Hydro further states that “It is important to note that BC Hydro is only proposing this exemption on the premise that the change to the Energy Price, discussed further in section 1.2.3 and section 4 below, is approved. If this change is not approved, the financial impact of this exemption to non-participating ratepayers is potentially greater and BC Hydro would need to reconsider whether it is appropriate.”²

Riverside Energy states “We respectfully propose 10 kW (RCR) and 25 kW (MGS and LGS) thresholds for solar PV based generation as alternatives to BC Hydro’s proposed 5 kW threshold across the board for all generation types and rate classes.”³

PEC states “When coupled with PEC’s recommended anniversary date and true-up period changes, we propose that the load to generation ratio should only apply to systems above 8kW.”⁴

CanSIA states “The limits on load sizing are extraneous for smaller systems and should exempt PV NM systems 10 kw and below.”⁵

- 1.1 Please discuss the relative merits of a 5kW, 8kW and 10kW nameplate capacity threshold for exempting Generating Facilities from the requirement to have an estimated Annual Energy Output no greater than 110 per cent of the customer’s estimated Annual Load.
- 1.2 Please discuss the relative risks of a 5kW, 8kW and 10kW nameplate capacity threshold in a scenario where a customer constructs a Generating Facility up to the threshold level but has little or no load. Specifically, please comment on the implications of each threshold with regards to cost impacts to non-participating customers and with regards to maintaining the load offset intent of the Program.

¹ Exhibit B-1, page 22.

² Exhibit B-1, page 22.

³ Exhibit C13-2, page 1.

⁴ Exhibit C24,-2, page 4.

⁵ Exhibit C7-3, page 1.