

Fred James

Chief Regulatory Officer

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September 13, 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)
Application to Expand Rate Schedule (RS) 1880 (Standby and Maintenance
Supply) Availability to RS 1828 Biomass Energy Program Customers**

BC Hydro is seeking approval pursuant to sections 58 to 61 of the *Utilities Commission Act (UCA)* for amendment to Rate Schedule (**RS**) 1880 to expand availability to customers taking service under RS 1828 (Transmission Service – Biomass Energy Program). As explained further below, BC Hydro is proposing this amendment as an administrative clarification to the RS 1880 tariff sheets contained in BC Hydro's Application for Approval of RS 1828 – Transmission Service - Biomass Energy Program. This application was filed on April 15, 2019 and approved by Commission Order No. G-87-19.

The B.C. Government provided Direction to the BCUC Respecting the Biomass Energy Program (Order in Council 158, April 1, 2019, BC Reg. 71/2019) to set a rate schedule as provided in Appendix 1 of the Direction and which BC Hydro provided in its Application as RS 1828. RS 1828 is available to Customers who have entered into a contract with BC Hydro under the Biomass Energy Program. BC Hydro indicated in its application that the addition of RS 1828 into its Electric Tariff results in administrative changes and included these changes to its tariff sheets in its application.

RS 1880 is currently available to transmission service customers supplied with electricity under RS 1823 (Stepped Rate), RS 1825 (TOU Rate), RS 1827 (Rate for Exempt Customers) or RS 1852 (Modified Demand), on an interruptible basis. Electricity supplied under RS 1880 serves as replacement energy for customers with self-generation due to curtailment of the customer's on-site generation.

In this application, BC Hydro is seeking approval to extend the availability of RS 1880 to RS 1828 customers so that an RS 1828 customer with self-generation will have the same access to RS 1880 for replacement energy as an RS 1823 customer with

self-generation. RS 1828 customers are the same as RS 1823 customers, other than the different pricing in place to address the uniqueness of the Biomass Energy Program. The terms and conditions of transmission service under RS 1828, as specified on page 5-16 of the rate schedule are the same as those under RS 1823.¹ In addition, RS 1828 does not restrict customers taking service under the rate from taking service under RS 1880.²

As a result, BC Hydro considers that including RS 1828 customers under the RS 1880 Availability section and other related flow-through changes in RS 1880 are warranted. Given the administrative nature of the requested tariff change, BC Hydro does not propose any regulatory process. BC Hydro expects that we may be providing RS 1828 service as early as October 1, 2019. Therefore, BC Hydro respectfully requests a Commission Order approving the amended RS 1880 with an effective date of October 1, 2019.

Attachment A contains a draft copy of the Commission Order.

A blacklined and clean copy of RS 1880 are included as Attachment B. The source documents of the tariff sheets are attached to the electronic version of this submission for stamping by the Commission and return to BC Hydro.

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

Yours sincerely,



Fred James
Chief Regulatory Officer

ac/rh

Enclosure

¹ RS 1828 states “The terms and conditions under which Transmission Service is supplied are contained in Electric Tariff Supplement Nos. 5 and 6, or Electric Tariff Supplements Nos. 87 and 88, as applicable.” (Please refer to Rate Schedule 1828, Note section, page 5-16, BC Hydro Electric Tariff).

² RS 1828 states “Customers who have entered into a contract with BC Hydro under the Biomass Energy Program may not be provided with service under Rate Schedule 1823 (Stepped Rate), 1825 (TOU Rate), 1827 (Rate for Exempt Customers) or 1852 (Modified Demand) while the contract is in force.” (Please refer to Rate Schedule 1828, Availability section, page 5-13, BC Hydro Electric Tariff).

**BC Hydro Rate Schedule 1880 (Standby and
Maintenance Supply) Amendment Application**

Attachment A

Draft Order

Suite 410, 900 Howe Street
Vancouver, BC Canada V6Z 2N3
P: 604.660.4700
TF: 1.800.663.1385
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ORDER NUMBER
G-xx-xx

IN THE MATTER OF
the *Utilities Commission Act*, RSBC 1996, Chapter 473

and

British Columbia Hydro and Power Authority (BC Hydro)
Application to Expand Rate Schedule (RS) 1880 (Standby and Maintenance Supply)
Availability to RS 1828 Biomass Energy Program Customers (Application)

BEFORE:

Commissioner
Commissioner
Commissioner

on Date

ORDER

WHEREAS:

- A. On April 1, 2019, the B.C. Government issued its Direction to the British Columbia Utilities Commission (**BCUC** or **Commission**) Respecting the Biomass Energy Program (Order in Council No. 158, BC Reg. 71/2019) (**Direction**) which, among other things, directed the Commission to set a rate required for the Biomass Energy Program as filed by BC Hydro;
- B. On April 15, 2019, pursuant to the Direction, BC Hydro filed an application requesting a Commission Order approving Rate Schedule (**RS**) 1828 – Transmission Service – Biomass Energy Program, and other Electric Tariff updates resulting from the addition of RS 1828, all of which were filed as Attachment B to that application;
- C. On April 24, 2019, the Commission approved RS 1828 and the Electric Tariff updates resulting from the addition of RS 1828 by Commission Order No. G-87-19;
- D. On September 13, 2019, BC Hydro filed an Application requesting a BCUC order approving an amendment to RS 1880 to expand availability to customers taking service under RS 1828 (Transmission Service – Biomass Energy Program) which is an administrative clarification to the RS 1880 tariff sheets filed in BC Hydro’s original application;
- E. RS 1880 is currently available to transmission service customers supplied with electricity under RS 1823 (Stepped Rate), RS 1825 (TOU Rate), RS 1827 (Rate for Exempt Customers) and RS 1852 (Modified Demand), on an interruptible basis. Electricity supplied under RS 1880 serves as replacement energy for customers with self-generation due to curtailment of the customer’s on-site generation;

.../2

- F. BC Hydro considers the amendment to RS 1880 is warranted, given that RS 1828 customers are the same as RS 1823 customers, other than the different pricing in place to address the uniqueness of the Biomass Energy Program. The terms and conditions of transmission service under RS 1828, as specified on page 5-16 of the rate schedule, are the same as those under RS 1823. In addition, RS 1828 does not restrict customers taking service under the rate from taking service under RS 1880.

NOW THEREFORE pursuant to sections 58 to 61 of the *Utilities Commission Act*, the Commission orders as follows:

1. The amended RS 1880, resulting from expanding RS 1880 availability to include RS 1828 customers, which is included as Attachment B to the Application, is approved effective October 1, 2019.

DATED at the City of Vancouver, in the Province of British Columbia, this (XX) day of (Month Year).

BY ORDER

(X. X. last name)
Commissioner

DRAFT

**BC Hydro Rate Schedule 1880 (Standby and
Maintenance Supply) Amendment Application**

Attachment B

Tariff Sheets

**BC Hydro Rate Schedule 1880 (Standby and
Maintenance Supply) Amendment Application**

Attachment B-1

**Tariff Sheets
Clean**

5. TRANSMISSION SERVICE

RATE SCHEDULE 1880 – TRANSMISSION SERVICE – STANDBY AND MAINTENANCE SUPPLY

Availability	For Customers supplied with Electricity under Rate Schedule 1823 (Stepped Rate), 1825 (TOU Rate), 1827 (Rate for Exempt Customers), 1828 (Biomass Energy Program) or 1852 (Modified Demand), on an interruptible basis.
Applicable in	Rate Zone I excluding the Districts of Kingsgate-Yahk and Lardeau-Shutty Bench.
Rate	<p>Administrative Charge: \$150.00 per Period of Use</p> <p>plus</p> <p>Energy Charge: During the Period of Use, 10.160 ¢ per kWh of metered Rate Schedule 1880 energy consumption, determined as set out below</p>
Definitions	<p>1. HLH Reference Demand</p> <p>HLH Reference Demand is the highest kVA Demand in the HLH for the current Billing Period prior to the Period of Use, but excluding any prior Period of Use. If the Period of Use extends over an entire Billing Period, the highest kVA Demand in the HLH from the prior Billing Period will be used in determining the HLH Reference Demand, excluding any Period of Use in the prior Billing Period.</p> <p>For the purpose of determining HLH Reference Demand, the HLH periods are as defined in Rate Schedule 1823, 1825, 1827, 1828 or 1852, whichever is applicable.</p>

ACCEPTED: _____

ORDER NO. _____

COMMISSION SECRETARY

BC Hydro

Rate Schedule 1880 – Revision 4

Effective: October 1, 2019

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	<p>2. Period of Use</p> <p>A period of consecutive hours during which Electricity is taken under this Rate Schedule. The Period of Use is as defined by the Customer when requesting Service from BC Hydro under this Rate Schedule 1880 and may extend into subsequent Billing Periods.</p>
<p>Rate Schedule 1880 Energy Determination</p>	<p>During HLH periods, the kWh consumption on an hourly basis which exceeds the HLH high kWh per hour within the Period of Use or portion thereof where HLH high kWh per hour is the product of HLH Reference Demand multiplied by the Power Factor for the half hour when the HLH Reference Demand occurred.</p> <p>For the purpose of the Rate Schedule 1880 Energy Determination, the HLH periods are as defined in Rate Schedule 1823, 1825, 1827, 1828 or 1852, whichever is applicable.</p>
<p>Special Conditions</p>	<p>1. BC Hydro agrees to provide Electricity under this Rate Schedule to the extent that it has energy and capacity to do so.</p> <p>2. BC Hydro may, without notice to the Customer, refuse to supply or terminate the supply of Electricity under this Rate Schedule if at any time during the Period of Use BC Hydro does not have sufficient energy or capacity.</p>

ACCEPTED: _____

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3. This Rate Schedule is only for the following purposes:

To provide Electricity the Customer would otherwise generate during periods when all or part of the Customer's electrical generating plant is curtailed.

Electricity used for this purpose may be taken on an instantaneous basis when the impact of the instantaneous pickup of loads normally provided by the Customer's electrical generation units does not occur after BC Hydro has advised the Customer that a period of system constraint or potential system constraint exists.

During periods of potential system constraints, BC Hydro will require Customers to arm load shedding relays to ensure that the loss of electricity production from a Customer's electrical generation unit will not result in a demand greater than the Customer's Maximum kVA Demand on BC Hydro's system. BC Hydro may require the Customer to provide it with control of these load shedding relays. During periods of potential system constraints, upon a Customer's request, BC Hydro will endeavour to provide Electricity normally provided by the Customer's electrical generation unit.

The Customer is required to advise BC Hydro within 30 minutes of taking Electricity under this Rate Schedule for this purpose. If the Customer fails to advise BC Hydro within 30 minutes, measured Demand and Energy consumption will be billed under Rate Schedule 1823, 1825, 1827, 1828 or 1852, whichever is applicable.

4. Electricity taken under this Rate Schedule will not displace Electricity otherwise to be taken by the Customer under Rate Schedule 1823, 1825, 1827, 1828 or 1852.

Electricity taken under this Rate Schedule will not displace electricity that would normally be generated by the Customer for the purpose of re-sale.

ACCEPTED: _____

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Rate Schedule 1880 – Revision 4

Effective: October 1, 2019

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	<p>5. In addition to the charges specifically set out in this Rate Schedule, the Customer will pay for any additional facilities required to deliver Electricity under this Rate Schedule provided that BC Hydro obtains the prior consent of the Customer for construction of the additional facilities.</p> <p>6. A Customer may be required to allow BC Hydro to install metering and communication equipment to measure the electricity output of the Customer’s self-generation unit.</p> <p>7. BC Hydro will bill for Electricity taken under Rate Schedule 1880 at the same time it bills for Electricity taken under Rate Schedule 1823, 1825, 1827, 1828 or 1852, whichever is applicable.</p>
Taxes	The rates set out in this Rate Schedule are exclusive of goods and services and provincial sales taxes.
Note	The terms and conditions under which Transmission Service is supplied are contained in Electric Tariff Supplement Nos. 5 and 6, or Electric Tariff Supplement Nos. 87 and 88, as applicable.
Rate Rider	The Deferral Account Rate Rider as set out in Rate Schedule 1901 applies to all charges payable under this Rate Schedule, before taxes and levies.
Rate Increase	Effective April 1, 2019 the Energy Charge under this Rate Schedule includes an interim rate increase of 6.85% before rounding, approved by BCUC Order No. G-45-19.

ACCEPTED: _____

ORDER NO. _____

COMMISSION SECRETARY

**BC Hydro Rate Schedule 1880 (Standby and
Maintenance Supply) Amendment Application**

Attachment B-2

**Tariff Sheets
Black-lined**

BC Hydro

Rate Schedule 1880 – ~~Revision 3~~Revision 4Effective: ~~April 24, 2019~~October 1, 2019

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5. TRANSMISSION SERVICE

RATE SCHEDULE 1880 – TRANSMISSION SERVICE – STANDBY AND MAINTENANCE SUPPLY

Availability	For Customers supplied with Electricity under Rate Schedule 1823 (Stepped Rate), 1825 (TOU Rate), 1827 (Rate for Exempt Customers), <u>1828 (Biomass Energy Program)</u> or 1852 (Modified Demand), on an interruptible basis.
Applicable in	Rate Zone I excluding the Districts of Kingsgate-Yahk and Lardeau-Shutty Bench.
Rate	Administrative Charge: \$150.00 per Period of Use plus Energy Charge: During the Period of Use, 10.160 ¢ per kWh of metered Rate Schedule 1880 energy consumption, determined as set out below
Definitions	1. HLH Reference Demand HLH Reference Demand is the highest kVA Demand in the HLH for the current Billing Period prior to the Period of Use, but excluding any prior Period of Use. If the Period of Use extends over an entire Billing Period, the highest kVA Demand in the HLH from the prior Billing Period will be used in determining the HLH Reference Demand, excluding any Period of Use in the prior Billing Period. For the purpose of determining HLH Reference Demand, the HLH periods are as defined in Rate Schedule 1823, 1825, 1827, <u>1828</u> or 1852, whichever is applicable.

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Rate Schedule 1880 – ~~Revision 3~~Revision 4
 Effective: ~~April 24, 2019~~October 1, 2019

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	<p>2. Period of Use</p> <p>A period of consecutive hours during which Electricity is taken under this Rate Schedule. The Period of Use is as defined by the Customer when requesting Service from BC Hydro under this Rate Schedule 1880 and may extend into subsequent Billing Periods.</p>
<p>Rate Schedule 1880 Energy Determination</p>	<p>During HLH periods, the kWh consumption on an hourly basis which exceeds the HLH high kWh per hour within the Period of Use or portion thereof where HLH high kWh per hour is the product of HLH Reference Demand multiplied by the Power Factor for the half hour when the HLH Reference Demand occurred.</p> <p>For the purpose of the Rate Schedule 1880 Energy Determination, the HLH periods are as defined in Rate Schedule 1823, 1825, 1827, <u>1828</u> or 1852, whichever is applicable.</p>
<p>Special Conditions</p>	<p>1. BC Hydro agrees to provide Electricity under this Rate Schedule to the extent that it has energy and capacity to do so.</p> <p>2. BC Hydro may, without notice to the Customer, refuse to supply or terminate the supply of Electricity under this Rate Schedule if at any time during the Period of Use BC Hydro does not have sufficient energy or capacity.</p>

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Rate Schedule 1880 – ~~Revision 3~~Revision 4
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The Customer is required to advise BC Hydro within 30 minutes of taking Electricity under this Rate Schedule for this purpose. If the Customer fails to advise BC Hydro within 30 minutes, measured Demand and Energy consumption will be billed under Rate Schedule 1823, 1825, 1827, 1828 or 1852, whichever is applicable.

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Rate Schedule 1880 – ~~Revision 3~~ Revision 4
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	<p>5. In addition to the charges specifically set out in this Rate Schedule, the Customer will pay for any additional facilities required to deliver Electricity under this Rate Schedule provided that BC Hydro obtains the prior consent of the Customer for construction of the additional facilities.</p> <p>6. A Customer may be required to allow BC Hydro to install metering and communication equipment to measure the electricity output of the Customer’s self-generation unit.</p> <p>7. BC Hydro will bill for Electricity taken under Rate Schedule 1880 at the same time it bills for Electricity taken under Rate Schedule 1823, 1825, 1827, <u>1828</u> or 1852, whichever is applicable.</p>
Taxes	The rates set out in this Rate Schedule are exclusive of goods and services and provincial sales taxes.
Note	The terms and conditions under which Transmission Service is supplied are contained in Electric Tariff Supplement Nos. 5 and 6, or Electric Tariff Supplement Nos. 87 and 88, as applicable.
Rate Rider	The Deferral Account Rate Rider as set out in Rate Schedule 1901 applies to all charges payable under this Rate Schedule, before taxes and levies.
Rate Increase	Effective April 1, 2019 the Energy Charge under this Rate Schedule includes an interim rate increase of 6.85% before rounding, approved by BCUC Order No. G-45-19.

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