

Fred James

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September 21, 2020

Ms. Marija Tresoglavic Acting Commission Secretary and Manager Regulatory Support British Columbia Utilities Commission Suite 410, 900 Howe Street Vancouver, BC V6Z 2N3

Dear Ms. Tresoglavic:

RE: British Columbia Utilities Commission (BCUC or Commission)

British Columbia Hydro and Power Authority (BC Hydro)

Rate Schedule (RS) 1893 – Transmission Service Incremental Energy Rate

Alternative Baselines Application (2020) (the Application)

BC Hydro writes to the BCUC to apply for approval, pursuant to sections 58 to 61 of the *Utilities Commission Act*, of alternative High Load Hour (**HLH**) Baselines, Low Load Hour (**LLH**) Baselines and Monthly Reference Demands (collectively, **RS 1893 Baselines**) for one Customer site (West Fraser Mills Ltd (**West Fraser**) - Quesnel River Pulp) that is served under RS 1823 – Transmission Service – Stepped Rate and has elected to participate in the RS 1893 – Transmission Service – Incremental Energy Rate (**IER**) Pilot. The IER Pilot was approved pursuant to BCUC Order No. G-300-19, effective January 1, 2020, and is available as a pilot commencing January 1, 2020 until March 31, 2024 on an interim and non-refundable basis until further order by the BCUC.

The alternative RS 1893 Baselines for this Customer site for which BC Hydro seeks approval are contained in Appendix C of the Application. RS 1893 Baselines are used to determine the baseline amounts of energy and demand to be charged to participating Customers under RS 1823 or RS 1828 – Transmission Service – Biomass Energy Program, as applicable. Any net incremental energy use is then charged under RS 1893.

BC Hydro acknowledges the delay in filing for approval of the alternative RS 1893 Baselines for this Customer site. BC Hydro had intended to file one application with the BCUC for approval of alternative RS 1893 Baselines for two separate Customer sites for efficiency and that process has taken longer than expected. BC Hydro was recently advised that the one Customer site did not wish to proceed with the request for alternative RS 1893 Baselines and as a result, this application is for approval of West Fraser – Quesnel River Pulp.



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BC Hydro respectfully requests that the BCUC grant approval of the attached alternative RS 1893 Baselines by Friday, October 30, 2020. BC Hydro has billed the Customer site using the agreed-to alternative RS 1893 Baselines since April 1, 2020 on an interim basis pending BCUC review and approval of the alternative RS 1893 Baselines.

The Application includes the following appendices:

- Appendix A contains the draft of the BCUC Order that BC Hydro is requesting;
- Appendix B contains a copy of RS 1893;
- **Appendix C** contains the following information for the Customer site for which BC Hydro is requesting approval of alternative RS 1893 Baselines:
 - ▶ A copy of BC Hydro's letter to explain how the alternative RS 1893 Baselines proposed were determined; and
 - ▶ A copy of the RS 1893 Baseline Statement, signed by the Customer to confirm agreement, which shows the Customer's unadjusted RS 1893 Baselines and alternative RS 1893 Baselines.

Appendix C contains confidential Customer information and is filed on a confidential basis with the BCUC only. A public version of the Application is filed under separate cover.

1 Background

In accordance with Special Condition 3b(ii) of RS 1893, a total of 17 transmission service Customer sites provided written notice to BC Hydro and have met the RS 1893 criteria to participate in the IER Pilot for the period starting April 1, 2020 and ending March 31, 2021. BC Hydro confirms that all participating Customers have satisfied the criteria set out in Special Conditions 3 and 7 of RS 1893.

For each Customer site, the RS 1893 Baselines were initially determined using electricity consumption for BC Hydro's Fiscal year 2019 (April 1, 2018 to March 31, 2019) in accordance with RS 1893. However, in accordance with Special Condition 8 of RS 1893, BC Hydro and West Fraser agreed that such RS 1893 Baselines determined using unadjusted Fiscal year 2019 electricity consumption were not representative of their normal expected electricity consumption in Fiscal year 2021. Accordingly, BC Hydro and West Fraser have agreed to alternative RS 1893 Baselines, which are filed in the Application for BCUC's approval

Although the details of the Customers alternative RS 1893 Baselines are confidential, BC Hydro has summarized below the baseline adjustment and determination process that was applied in accordance with RS 1893.



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2 Relevant RS 1893 Provisions

A complete copy of the approved RS 1893 is provided in Appendix B. The relevant RS 1893 provisions used in determining the Customer's alternative RS 1893 Baselines are provided below for convenience:

Definitions

3. HLH Baseline

"The Customer's average hourly energy consumption under Rate Schedule 1823 or Rate Schedule 1828, as applicable, during HLH for each calendar month of the BC Hydro fiscal year commencing April 1, 2018 and ending March 31, 2019 (Fiscal 2019), or other period as determined in accordance with Special Condition 7, 8 and/or 9. For greater certainty, the HLH Baseline will represent the historical electricity consumption in HLH for the calendar month divided by the total number of HLH in that month."

8. LLH Baseline

"The Customer's average hourly energy consumption under Rate Schedule 1823 or Rate Schedule 1828 (as applicable) during LLH for each calendar month of the BC Hydro fiscal year commencing April 1, 2018 and ending March 31, 2019 (Fiscal 2019), or other period as determined in accordance with Special Condition 7, 8 and/or 9. For greater certainty, the LLH Baseline for each calendar month will represent the historical electricity consumption in LLH for the calendar month divided by the total number of LLH in that month."

12. Monthly Reference Demand

"The Monthly Reference Demand will be the actual Billing Demand (in kVA) during each Billing Period of Fiscal 2019, or other period as determined in accordance with Special Condition 7, 8 and/or 9, and which is used to determine the Customer's HLH and LLH Baselines."

Special Conditions

- Special Condition 8 of RS 1893 provides that, if BC Hydro and the Customer agree that the RS 1893 Baselines are not representative of the Customer's normal expected electricity usage, and the parties agree to alternative RS 1893 Baselines, BC Hydro will file the alternative RS 1893 Baselines with the BCUC for approval.
- Special Condition 9 of RS 1893 provides that BC Hydro will file with the BCUC any adjustments to the RS 1893 Baselines that are requested by customers and which



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BC Hydro has determined are consistent with the principles and criteria set out in Electric Tariff Supplement No. (**TS**) 74.

 Special Condition 10 of RS 1893 provides that, subject to direction from the BCUC, BC Hydro will use the RS 1893 Baselines filed in accordance with Special Condition 8 and/or 9 for the purposes of applying RS 1893 and RS 1823 or RS 1828, as applicable.

3 Summary of Alternative RS 1893 Baselines

In accordance with Special Condition 8 of RS 1893, the Customer has reached an agreement with BC Hydro on alternative RS 1893 Baselines as described below. Specific details of the adjustment are filed on a confidential basis in Appendix C. The Customer has been informed that the agreed-to alternative RS 1893 Baselines remain subject to BCUC approval.

West Fraser Mills Ltd. - Quesnel River Pulp site

West Fraser has requested an adjustment to the RS 1893 Baselines for the Quesnel River Pulp site to consider the impact of a Demand Side Management (**DSM**) project which was installed/commissioned in October 2018.

The estimated impact of this DSM project was reviewed and verified by BC Hydro and incorporated into the Customer's Final F2019 and Interim F2020 Customer Baseline Load (**CBL**) determination as a CBL debit adjustment in accordance with TS 74.

In accordance with Special Condition 8 of RS 1893, BC Hydro and West Fraser have agreed that electricity consumption from the calendar year 2019 period (being the most recent annual period) includes a full year of plant operations and electricity consumption with the DSM project in place. We have also agreed that this annual period is most representative of normal expected electricity consumption in Fiscal year 2021 and should be used for determination of alternative RS 1893 Baselines.

Please refer to BC Hydro's letter in Appendix C for details of the event and the results of BC Hydro's Engineering Review. The agreed-to adjustments are shown in the Customer's signed RS 1893 Baselines Statement.

4 Request for Confidentiality of Customer Information

In accordance with section 18 of the BCUC's Rules of Practice and Procedure (attached to BCUC Order No. G-1-16), BC Hydro requests that the BCUC treat Appendix C as confidential.

Appendix C of the Application provides the Customer's unadjusted RS 1893 Baselines and alternative RS 1893 Baselines for which BC Hydro is requesting approval. The letter



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also contains confidential information about the Customer's operations and electricity consumption data that form the basis for adjustment.

The Customer considers this information to be commercially sensitive and confidential because competitors could use it to estimate the Customer's production levels, cost of production and efficiency. BC Hydro consistently treats this type of Customer information as confidential.

The public version of the Application does not include redacted versions of Appendix C as section 3 above provides a non-confidential summary of BC Hydro's determination.

A copy of the Application will be distributed to West Fraser.

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

bf/ma

Enclosure



RS 1893 Transmission Service Incremental Energy Rate Alternative Baselines Application

Appendix A

Draft Order

Appendix A



Suite 410, 900 Howe Street Vancouver, BC Canada V6Z 2N3

P: 604.660.4700 TF: 1.800.663.1385 F: 604.660.1102

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)
Rate Schedule 1893 – Transmission Service
Incremental Energy Rate Alternative Baselines Application (2020)

BEFORE:

Commissioner Commissioner Commissioner

on Date

ORDER

WHEREAS:

- A. On October 31, 2019, the British Columbia Hydro and Power Authority (BC Hydro) filed an application, pursuant to sections 58 to 61 of the *Utilities Commission Act*, with the British Columbia Utilities Commission (BCUC) seeking approval, among other things, of a new optional rate, the Incremental Energy Rate (Rate Schedule 1893;
- B. By Order No. G-300-19 dated November 26, 2019, the Incremental Energy Rate was approved effective January 1, 2020 on an interim and non-refundable basis until further order by the BCUC;
- C. On September 21, 2020, BC Hydro filed with the BCUC, in accordance with Special Condition 8 of the Incremental Energy Rate, alternative High Load Hour (HLH) Baselines and Low load Hour (LLH) Baselines and Monthly Reference Demands (collectively, RS 1893 Baselines) for a specified customer site effective April 1, 2020 (Application). Specifically, the Application requests approval for the alternative RS 1893 Baselines contained in Appendix C of the Application for this customer site;
- D. BC Hydro filed a public and confidential version of the Application. BC Hydro requested that Appendix C of the Application be held in confidence as it contains information that is commercially sensitive to the customer; and
- E. The Commission has considered the Application and determined that approval is warranted.

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

- 1. The RS 1893 Baselines contained in Appendix C of the Application are approved effective April 1, 2020; and
- 2. Appendix C of the Application will be held in confidence as it contains information that is commercially sensitive to the customer.

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

Attachment Options





RS 1893 Transmission Service Incremental Energy Rate Alternative Baselines Application

Appendix B

Current RS 1893

BC Hydro Rate Schedule 1893 – Original Effective: January 1, 2020

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5. TRANSMISSION SERVICE

RATE SCHEDULE 1893 - TRANSMISSION SERVICE - INCREMENTAL ENERGY **RATE**

Availability	For Customers supplied with Electricity under Rate Schedule 1823 (Transmission Service – Stepped Rate) or Rate Schedule 1828 (Transmission Service – Biomass Energy Program), as applicable, that increase their Electricity usage during each Billing Period, subject to the Special Conditions below. If a Customer is eligible to take service under this Rate Schedule and Rate Schedule 1892 (Freshet Energy Rate), the Customer may only take service under one of these Rate Schedules in any Billing Year.		
Applicable in	Rate Zone I excluding the Districts of Kingsgate-Yahk and Lardeau-Shutty Bench.		
Termination Date	This Rate Schedule will terminate effective March 31, 2024.		
Rate	Energy Charge:		
	The charge applied to energy supplied under this Rate Schedule 1893 during each HLH and LLH in the Billing Period is equal to:		
	1. The greater of:		
	(a) The Intercontinental Exchange (ICE) Mid-Columbia (Mid-C) Peak or Mid-C Off-Peak weighted average index price, as published by the ICE in the ICE Day Ahead Power Price Report, applicable to the hour on each day of the Billing Period; and		
	(b) \$0/kWh; plus		
	2. An adder of \$3.00/MWh for the May, June and July Billing Periods and \$7.00/MWh for all other Billing Periods.		

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Definitions

Terms used in this Rate Schedule have the meanings given to them in Electric Tariff Supplement No. 5 or 87 (as applicable) and Rate Schedule 1823 or Rate Schedule 1828 (as applicable), unless otherwise defined. In addition, the following terms have the following meanings:

1. Billing Period

Each Billing Period is a calendar month, beginning on the first day of that calendar month and ending on the last day of that calendar month.

2. High Load Hours (HLH)

HLH is the period from 06:00 to 22:00 Monday to Saturday, except for Statutory Holidays (New Year's Day, Family Day, Good Friday, Victoria Day, Canada Day, B.C. Day, Labour Day, Thanksgiving Day, Remembrance Day and Christmas Day).

3. HLH Baseline

The Customer's average hourly energy consumption under Rate Schedule 1823 or Rate Schedule 1828, as applicable, during HLH for each calendar month of the BC Hydro fiscal year commencing April 1, 2018 and ending March 31, 2019 (Fiscal 2019), or other period as determined in accordance with Special Condition 7, 8 and/or 9. For greater certainty, the HLH Baseline will represent the historical electricity consumption in HLH for the calendar month divided by the total number of HLH in that month.

4. HLH Gross Incremental Energy

The hourly energy taken by the Customer during each HLH of the Billing Period in excess of the HLH Baseline, excluding all hours where the energy taken is less than the HLH Baseline.

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5. HLH Net Incremental Energy

The total energy taken by the Customer during all HLH of the Billing Period in excess of the total energy taken by the Customer under Rate Schedule 1823 or Rate Schedule 1828 (as applicable) during all HLH of the Billing Period.

6. Monthly HLH Net to Gross Ratio

The ratio obtained by dividing HLH Net Incremental Energy by the sum of HLH Gross Incremental Energy for each Billing Period.

7. Low Load Hours (LLH)

LLH are all hours other than HLH.

8. LLH Baseline

The Customer's average hourly energy consumption under Rate Schedule 1823 or Rate Schedule 1828 (as applicable) during LLH for each calendar month of the BC Hydro fiscal year commencing April 1, 2018 and ending March 31, 2019 (Fiscal 2019), or other period as determined in accordance with Special Condition 7, 8 and/or 9. For greater certainty, the LLH Baseline for each calendar month will represent the historical electricity consumption in LLH for the calendar month divided by the total number of LLH in that month.

9. LLH Gross Incremental Energy

The hourly energy taken by the Customer during each LLH of the current Billing Period in excess of the LLH Baseline, excluding all hours where the energy taken is less than the LLH Baseline.

LLH Net Incremental Energy

The total energy taken by the Customer during all LLH of the current Billing Period in excess of the total energy taken by the Customer under Rate Schedule 1823 or Rate Schedule 1828 (as applicable) during all LLH of the Billing Period.

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	 11. Monthly LLH Net to Gross Ratio The ratio obtained by dividing LLH Net Incremental Energy by the sum of LLH Gross Incremental Energy for each Billing Period. 12. Monthly Reference Demand
	The Monthly Reference Demand will be the actual Billing Demand (in kVA) during each Billing Period of Fiscal 2019, or other period as determined in accordance with Special Condition 7, 8 and/or 9, and which is used to determine the Customer's HLH and LLH Baselines.
Highest kVA Demand for Rate Schedule 1823 or Rate Schedule 1828	If the Customer is supplied with Electricity under this Rate Schedule, for the purposes of determining Billing Demand under Rate Schedule 1823 or Rate Schedule 1828 (as applicable), the highest kVA Demand during the High Load Hours in each Billing Period will be equal to the lesser of: 1. The Monthly Reference Demand; or 2. The actual highest kVA Demand during the High Load Hours in the Billing Period.
Reference Energy for Rate Schedule 1823 or Rate Schedule 1828	If the Customer is supplied with Electricity under this Rate Schedule, the energy supplied to the Customer under Rate Schedule 1823 or Rate Schedule 1828 (as applicable) in each Billing Period will be the total energy supplied to the Customer less HLH and LLH Net Incremental Energy.
Rate Schedule 1893 Energy Determination	 If HLH Net Incremental Energy is greater than zero, the HLH Gross Incremental Energy for each HLH hour of the Billing Period will be multiplied by the Monthly HLH Net to Gross Ratio. The product will be the amount of energy supplied during that HLH hour under this Rate Schedule.
	 If LLH Net Incremental Energy is greater than zero, the LLH Gross Incremental Energy for each LLH hour of the Billing Period will be multiplied by the Monthly LLH Net to Gross Ratio. The product will be the amount of energy supplied during that LLH hour under this Rate Schedule.

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	3.	Perio	ther energy supplied to the Customer during the current Billing od will be energy supplied under Rate Schedule 1823 or Schedule 1828 (as applicable).	
Special Conditions	1.		Electricity is available under this Rate Schedule on a pilot basis only until March 31, 2024. BC Hydro agrees to provide Electricity under this Rate Schedule to the extent that it has energy and capacity to do so. BC Hydro may refuse Service under this Rate Schedule in circumstances where BC Hydro does not have sufficient energy or capacity. For greater certainty, BC Hydro will not be required to construct a System Reinforcement under Electric Tariff Supplement Nos. 6 or 88 to provide Service under this Rate Schedule.	
	2.	the erefuse BC Hocerta		
	3.		der for a Customer to be eligible to take Electricity under this Schedule:	
		(a)	load to its Monthly Reference Demand within one hour of receiving notice to reduce its load from BC Hydro; and	
		(b)		
			(i) By March 1 for the upcoming Billing Year commencing April 1; or	
			(ii) For the period prior to March 1, 2020, within 30 days of the effective date of this Rate Schedule; or	
			(iii) Where a new RS 1823 Customer commences taking service during the Billing Year and still meets the eligibility criteria (such as by acquiring an existing site with the required consumption history), at least 30 days prior to the start of the next Billing Period; and	

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- Any notice provided by a Customer under this subsection (c) must include:
 - (i) An estimate of the amount of energy (in MWh) that the Customer expects to take under this Rate Schedule during each Billing Period; and
 - A description of the operational and/or production (ii) changes, as applicable, that the Customer plans to make at its plant to take advantage of this pilot program.
- 4. If a Customer fails to reduce load to its Monthly Reference Demand in accordance with a notice received from BC Hydro: (a) the Customer will be charged 150% of the Energy Charge applicable to the hour for all RS 1893 Energy supplied during the period that the Customer failed to reduce its load as determined by BC Hydro; and (b) BC Hydro may, at its discretion, cancel the Customer's service under this Rate Schedule. If a Customer's service is cancelled under this subsection, BC Hydro may require the Customer to install load control relays and associated telecommunications equipment at its facilities, at the Customer's cost, and provide BC Hydro with real-time control of these relays before the Customer is again eligible to take service under this Rate Schedule.
- 5. If a Customer has self-generation, Electricity may be taken by that Customer under this Rate Schedule on an instantaneous basis when all or part of the Customer's electrical generating plant is curtailed.
- 6. If a Customer taking service under this Rate Schedule also has an Electricity Purchase Agreement (EPA) with BC Hydro, no HLH and LLH Net Incremental Energy will be determined in any Billing Period if this energy is directly associated with an event of generator turndown, in accordance with and as defined in the EPA, for which the Customer is entitled to financial payment from BC Hydro under the EPA.

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7. Customers will require at least two years of historical Electricity usage, to be eligible for baseline determination. Customers who have been transferred to service under Rate Schedule 1828 can apply for adjustments to their HLH and LLH Baseline and Reference Demand to reflect their expected Rate Schedule 1828 Electricity usage.

Where the customer does not have historical annual electricity consumption for Fiscal 2019, the most recent 12 Billing Periods will be used.

- 8. If BC Hydro and the Customer agree that the LLH and HLH Baselines and/or Monthly Reference Demand as defined above are not representative of the Customer's normal expected Rate Schedule 1823 or Rate Schedule 1828 Electricity usage, as applicable, during each Billing Period, and the parties agree to alternative LLH and HLH Baselines and/or Monthly Reference Demand, BC Hydro will file the agreed-to LLH and HLH Baselines and/or Monthly Reference Demand with the British Columbia Utilities Commission (BCUC) for approval. In cases where the Customer and BC Hydro cannot reach agreement, the BCUC will determine the final LLH and HLH Baselines and Monthly Reference Demand.
- BC Hydro will file with the BCUC any adjustments to the HLH and LLH Baselines and/ or Monthly Reference Demands that are requested by customers and that BC Hydro has determined are consistent with the principles and criteria set out in BC Hydro's "Customer Baseline Load (CBL) Determination Guidelines" Electric Tariff Supplement No. 74.
- 10. Subject to direction from the BCUC, BC Hydro will use the LLH and HLH Baselines and Monthly Reference Demand filed in accordance with Special Condition 8 and/or 9 for the purposes of applying this Rate Schedule and Rate Schedule 1823 or Rate Schedule 1828, as applicable.

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- If an RS 1823 customer's highest kVA Demand in HLH of a Billing 11. Period is greater than the Monthly Reference Demand applicable to that Billing Period multiplied by 2.0, then: (i) the Monthly Reference Demand for that Billing Period will be automatically adjusted to be equal to 50% of the highest kVA Demand in HLH during that Billing Period: and (ii) the HLH and LLH Baselines for that Billing Period will be automatically adjusted to be equal to 50% of the total energy volumes taken by the customer in the HLH and LLH of that Billing Period. For RS 1823 customers, the adjustments to the Monthly Reference Demand and the HLH and LLH Baselines made pursuant to this Special Condition will be effective as of the start of the Billing Period in which the excess electricity was used. The adjusted Monthly Reference Demand and the adjusted HLH and LLH Baselines will remain in effect for that calendar month in future years of the RS 1893 pilot.
- 12. A Customer taking Electricity under this Rate Schedule may, by providing written notice to BC Hydro at any time, cancel supply under this Rate Schedule. In all cases of cancellation, BC Hydro will terminate RS 1893 service for the entire Billing Period in which the cancellation occurs. If supply under RS 1893 is cancelled, all electricity supplied will be billed under RS 1823 or RS 1828 and/or RS 1880, as applicable. BC Hydro will not rebill for any Electricity supplied under RS 1893 in a prior Billing Period. A Customer who cancels RS 1893 service will not be eligible to return to RS 1893 service during the Billing Year, but remains eligible to re-enrol for service under this Rate Schedule for any future Billing Year as long as all other eligibility requirements are met.
- 13. If a Customer with self-generation taking Electricity under this Rate Schedule requests service under Rate Schedule 1880 (Standby and Maintenance Supply) during any current Billing Period, Electricity supply under this Rate Schedule will be automatically cancelled for the remainder of the Billing Year. The date the Customer's RS 1880 service request is validated by BC Hydro will be the effective date of cancellation.

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	14. All monetary amounts referred to in this Rate Schedule will be paid in Canadian currency. The ICE Day Ahead Power Price Report referenced in this Rate Schedule is published in US dollars, and the amounts in the report will be converted from U.S. dollars to Canadian dollars at the Bank of Canada daily exchange rate on the applicable day(s).
Taxes	The rates set out in this Rate Schedule are exclusive of goods and services and provincial sales taxes, as applicable.
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 1901applies to all charges payable under this Rate Schedule, before taxes and levies.
Interim Rate	Effective January 1, 2020 this rate schedule is approved on an interim and non-refundable basis.

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RS 1893 Transmission Service Incremental Energy Rate Alternative Baselines Application

Appendix C Customer RS 1893 Baseline Information

PUBLIC

CONFIDENTIAL ATTACHMENT

FILED WITH BCUC ONLY