

Fred James

Chief Regulatory Officer

Phone: 604-623-4046

Fax: 604-623-4407

bchydroregulatorygroup@bchydro.com

March 15, 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: Project No. 3698781
British Columbia Utilities Commission (BCUC or Commission)
British Columbia Hydro and Power Authority (BC Hydro)
2015 Rate Design Application Module 1
2017/2018 Winter Moratorium Pilot
Responses to BCUC Staff Information Request No. 1**

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

**1.0 Reference: 2017/2018 WINTER MORATORIUM PILOT
Final Assessment Report (Report) of the two-year Winter
Moratorium Pilot (Pilot), Section 5, p. 22**

On page 22 of the British Columbia Hydro and Power Authority's (BC Hydro) Report dated November 16, 2018, BC Hydro concluded that the financial impacts through two years of the Pilot are low compared to the customer impacts of disconnecting electrical service during cold weather. As a result, it will continue to implement restrictions on winter disconnections as standard business practice. The Report also states that the business rules for future Winter Moratoriums will be modified to allow disconnections for extremely high consumption accounts that are primarily serving end uses not typical of residential service.

- 1.1. Does BC Hydro intend to formalize these restrictions on winter disconnections, including the business rules for disconnecting high consumption accounts in its terms and conditions?

RESPONSE:

BC Hydro does not intend to formalize the winter moratorium program in the Electric Tariff Terms and Conditions (the Electric Tariff). BC Hydro may disconnect customers for a variety of reasons, including non-payment, under section 2.4 of the Electric Tariff. As section 2.4 is permissive, BC Hydro is granted

discretion to determine when to disconnect a customer who meets certain criteria. BC Hydro's business practices provide clarity as to how BC Hydro implements its discretion under the Electric Tariff in a non-discriminatory manner. Since the day-to-day application of the Electric Tariff is an operational decision broadly authorized by the Electric Tariff, the details as to how BC Hydro will exercise its discretion are better suited for business practices than being formalized in the Electric Tariff. Additionally, many business practices – including winter disconnections – are posted on BC Hydro's website, which allows customers to easily access the information. These practices can be viewed at <https://app.bchydro.com/accounts-billing/bill-payment/customer-service-rules.html>.

Furthermore, BC Hydro's approach is consistent with BCUC Decision and Order No. G-5-17, concerning the 2015 Rate Design Application, where the panel wrote:

With regard to the winter moratorium pilot, the Panel notes that BC Hydro does not seek approval from the Commission for this pilot, nor is it required to obtain this approval, because operational discretion is granted in the tariff.¹

1.1.1. If so, please provide details on when BC Hydro intends to file an application to the British Columbia Utilities Commission to formalize these changes.

RESPONSE:

Please refer to BC Hydro's response to BCUC Staff IR 1.1.1.

1.1.2. If not, please explain why.

RESPONSE:


Please refer to BC Hydro's response to BCUC Staff IR 1.1.1.

¹ Decision and Order No. G-5-17, issued January 20, 2017, in the matter of BC Hydro and Power Authority 2015 Rate Design Application.

March 15, 2019
Mr. Patrick Wruck
Commission Secretary and Manager
Regulatory Support
British Columbia Utilities Commission
2015 Rate Design Application Module 1
2017/2018 Winter Moratorium Pilot
Responses to BCUC 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,



Fred James
Chief Regulatory Officer

hr/ma