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April 1, 2021

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:

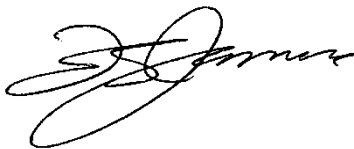
RE: Project No. 1599147
British Columbia Utilities Commission (BCUC or Commission)
British Columbia Hydro and Power Authority (BC Hydro)
2020 Street Lighting Rate Application (the Application)

BC Hydro writes in compliance with Commission Order No. G-43-21 to provide its responses to Round 2 information requests as follows:

Exhibit B-6	Responses to Commission IRs
Exhibit B-7	Responses to Interveners IRs
Exhibit B-5-2	Revision to Responses to Round 1 Intervener IRs – MHPOABC IRs 1.1A, 1.1B and 1.2G

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

ch/rh

Enclosure

Manufactured Home Park Owners Alliance of BC Information Request No. 1.1.A Dated: January 21, 2021 British Columbia Hydro & Power Authority REVISED Response issued April 1, 2021	Page 1 of 2
British Columbia Hydro & Power Authority Street Lighting Rate Application	Exhibit: B-5-2

1.0 Reference: Paragraph (ii), BC Hydro application letter dated November 12, 2020

1.1.A How many manufactured home parks have accounts with BC Hydro?

ORIGINAL RESPONSE:

BC Hydro is unable to provide the number of manufactured home parks with BC Hydro accounts because we do not maintain a unique identifier for manufactured homes in our customer database. They are classified the same as houses, duplexes or row homes in our system.

BC Hydro, however, maintains an identifier for mobile homes. For reference, the following table provides the number of mobile home park accounts, excluding individual units, by region. BC Hydro notes that some mobile home parks may have more than one common use area account. The actual number of mobile home parks is likely less than the number of accounts.

Region	Account
Lower Mainland	323
Northern	280
Southern Interior	601
Vancouver Island	577
Total	1,781

REVISED RESPONSE:

~~Although BC Hydro is unable to provide the number of manufactured home parks with BC Hydro accounts because we does not maintain a unique identifier for manufactured homes in our customer database. They are classified the same as houses, duplexes or row homes in our system.~~

~~BC Hydro, however, we do maintains an identifier for “mobile homes” which includes manufactured homes and an identifier for “mobile home parks” which includes manufactured home parks. For reference, t~~The following table provides the number of mobile home park accounts, excluding individual units, by region. BC Hydro notes that some mobile home parks may have more than one common use area account. The actual number of mobile home parks is likely less than the

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number of accounts. The number of accounts provided in the table below were updated from the original response due to data clean-up.

Region	Account
Lower Mainland	<u>323321</u>
Northern	<u>280278</u>
Southern Interior	<u>604569</u>
Vancouver Island	<u>577573</u>
Total	<u>1,781,741</u>

Manufactured Home Park Owners Alliance of BC Information Request No. 1.1.B Dated: January 21, 2021 British Columbia Hydro & Power Authority REVISED Response issued April 1, 2021	Page 1 of 1
British Columbia Hydro & Power Authority Street Lighting Rate Application	Exhibit: B-5-2

1.0 Reference: Paragraph (ii), BC Hydro application letter dated November 12, 2020

1.1.B To the extent permitted by privacy legislation, please provide a list of all such parks and their addresses.

ORIGINAL RESPONSE:

BC Hydro cannot provide the requested customer list for privacy reasons and, as noted in our response to MHPOABC IR 1.1.A, BC Hydro does not maintain a unique identifier for manufactured homes.

REVISED RESPONSE:

BC Hydro cannot provide the requested customer list for privacy reasons, ~~and, as noted in our response to MHPOABC IR 1.1.A, BC Hydro does not maintain a unique identifier for manufactured homes.~~

Manufactured Home Park Owners Alliance of BC Information Request No. 1.2.G Dated: January 21, 2021 British Columbia Hydro & Power Authority REVISED Response issued April 1, 2021	Page 1 of 2
British Columbia Hydro & Power Authority Street Lighting Rate Application	Exhibit: B-5-2

2.0 Reference: BC Hydro 2020 Street Light Rates Application Part 6, BC Hydro’s Proposed Termination of RS 1755

1.2.G Please describe in more detail this statement found on page 44, lines 13 to 15:
“BC Hydro now seeks to finalize its plans to exit this legacy service by removing the remaining lights and migrating customers onto other appropriate rate schedules if they wish to have continued service in accordance with the terms of the migration.”
What are/will be the appropriate rate schedules? What options might manufactured home park owners have with respect to these schedules?

ORIGINAL RESPONSE:

The Electric Tariff defines eligibility for BC Hydro’s rate schedules. Please refer to BC Hydro’s response to CEC IR 1.10.1 for a breakdown of the rate classes that the current RS 1755 services may move to when RS 1755 terminates.

Manufactured home parks are generally billed under Residential service.¹ However, General Service rates are available as an option for the common areas of the manufactured home park, pursuant to section 6.1.3 – General Service Election – Residential Customers.

As noted in BC Hydro’s response to MHPOABC IR 1.2E, RS 1755 Group 2 customers will have the option of transferring their private outdoor lighting service to RS 1701, provided the pole is suitable for continued lighting service.

Customers receiving RS 1755 Group 1 or Group 3 service will be required to install their own lighting following the termination of RS 1755. The electricity for the lighting would be billed at the rate for the manufactured home park as described above.

REVISED RESPONSE:

Please refer to BC Hydro’s revised response to MHPOABC IR 1.1.A which confirms its identifier of “mobile homes” includes manufactured homes and the identifier of “mobile home parks” includes manufactured home parks. BC Hydro does not delineate manufactured home parks from mobile home parks.

¹ BC Hydro notes that manufactured home parks are different than mobile home parks, which are to be billed under General Service rates.

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The Electric Tariff defines eligibility for BC Hydro’s rate schedules. Please refer to BC Hydro’s response to CEC IR 1.10.1 for a breakdown of the rate classes that the current RS 1755 services may move to when RS 1755 terminates. Mobile home park is included in the definition of “General Service” in the Electric Tariff.

~~Manufactured home parks are generally billed under Residential service.² However, General Service rates are available as an option for the common areas of the manufactured home park, pursuant to section 6.1.3 – General Service Election – Residential Customers.~~

As noted in BC Hydro’s response to MHPOABC IR 1.2E, RS 1755 Group 2 customers will have the option of transferring their private outdoor lighting service to RS 1701, provided the pole is suitable for continued lighting service.

Customers receiving RS 1755 Group 1 or Group 3 service will be required to install their own lighting following the termination of RS 1755. The electricity for the lighting would be billed under one of BC Hydro’s three General Service rates – Small General Service, Medium General Service or Large General service depending on the peak demand and/or the annual consumption of the account. at the rate for the manufactured home park as described above.

² ~~BC Hydro notes that manufactured home parks are different than mobile home parks, which are to be billed under General Service rates.~~