

Chris Sandve

Chief Regulatory Officer

Phone: 604-623-3918

Fax: 604-623-4407

bchydroregulatorygroup@bchydro.com

May 10, 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)

Enclosed for filing is an erratum to BC Hydro's Final Argument in the above-noted proceeding.

Yours sincerely,



Chris Sandve
Chief Regulatory Officer

ch/rh

Enclosure

BC Hydro 2020 Street Lighting Rate Application

ERRATUM – May 10, 2021

REMOVE	INSERT	NOTE
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Notes:

1. In Paragraph 43, reference to RS 1701 should read RS 1702.

(ii) enable the application of interest to under-billed amounts resulting from a customer's delayed or incorrect notification of the addition or alteration of unmetered Street Lights or equipment after a period of six months; and (iii) limit the application of credits to be applied to over-billed amounts to a period no longer than six months prior to the customer notifying BC Hydro of changes.

43. Street Lighting service is generally unmetered. For the most part, this is practical and cost effective because Street Lights follow a very predictable pattern of daily electricity usage. However, for those lights served under RS ~~4704~~1702 on an unmetered basis, BC Hydro must rely on customers to notify BC Hydro of any changes to the equipment or estimated consumption that could impact the bill. This does not happen consistently which can result in under-billing or over-billing by BC Hydro. Under-billing for service provided by BC Hydro impacts all ratepayers. The same is true for other unmetered services under the SGS RSs where BC Hydro relies on customers to provide notification of changes to equipment or estimated consumption.⁶⁰
44. As a result, BC Hydro's proposed amendments to its Electric Tariff clarify and strengthen the provisions of section 5.7 to ensure customers receiving unmetered services are incented to provide timely notification to BC Hydro of applicable changes.

Amendments are Fair, Just and Not Unduly Discriminatory

45. Concerns were raised in the letters of comment regarding the inconsistency between the duration of the adjustments for over-billing and under-billing under these proposed revisions as well as the discrepancy in interest charges.⁶¹

⁶⁰ Refer to BC Hydro's response to BCUC IR 1.15.1 (Exhibit B-4) for a discussion of why BC Hydro cannot audit unmetered services; BCUC IR 1.14.1 (Exhibit B-4) for a discussion of why BC Hydro has unmetered service and BCUC IR 1.15.3 (Exhibit B-4) for examples of under and over billed amounts. Please also see BC Hydro's response to BCUC IR 1.15.4 (Exhibit B-4) which discusses why these provisions are the appropriate incentive for customers to provide timely notifications.

⁶¹ City of Burnaby (Exhibit D-8-1); Township of Langley (Exhibit E-9).