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April 5, 2019

Mr. Patrick Wruck
Commission Secretary and Manager
Regulatory Support
British Columbia Utilities Commission
Suite 410, 900 Howe Street
Vancouver, BC V6Z 2N3

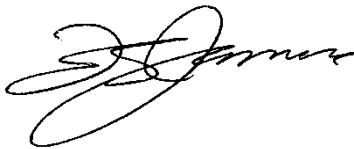
Dear Mr. Wruck:

**RE: British Columbia Utilities Commission (BCUC or Commission)
British Columbia Hydro and Power Authority (BC Hydro)
Electric Tariff Terms and Conditions Amendments Application
Responses to BCUC Staff Information Request (IR) No. 2**

BC Hydro writes to provide its responses to BCUC Staff Information Request No. 2 issued on March 27, 2019.

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 (1)

British Columbia Utilities Commission Information Request No. 2.1.1 Dated: March 27, 2019 British Columbia Hydro & Power Authority Response issued April 5, 2019	Page 1 of 2
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1.0 Reference: Application, p. 3; BC Hydro response to BCUC Staff Question 1.1 Tariff terms and conditions

On page 3 of the Application, BC Hydro states:

... for Customers who have multiple metered Residential Service at a Dwelling (e.g., one for the parking space and one for the living quarters) under RS 1101, their energy consumption will be billed in aggregate. That is, the entire Dwelling will be considered one Residential Service RS 1101 account even though the Dwelling is receiving multiple metered Service. The addition of a second meter for a Dwelling taking Residential Service under RS 1101 will not result in an additional Basic Charge or change the amount of energy (675 kWh per month) that is billed at the Step 1 price under the current Residential RS 1101. This amendment affords fair and consistent billing treatment for all Residential Service Customers, either living in a single-family home or a MURB.

In response to BCUC staff question 1.1, BC Hydro states that the Dwelling definition change is applicable to all Residential Services. BC Hydro defines a Dwelling to mean:

A building or part of a building comprising private living quarters and containing sleeping quarters, a kitchen and bathroom, and in which the occupants have free access to all rooms, or alternative living quarters acceptable to BC Hydro, and including single-family homes, apartments, residential strata lots, townhouses, row-houses and duplexes.

A Dwelling may include parking stalls, garage areas, storage areas and similar areas or spaces that are used in conjunction with the living quarters of the Customer.

2.1.1 Under the proposed amendments, please clarify whether a Customer may request more than two meters under the same account. For example, can a Customer account have a total of three meters if they have two parking stalls (i.e. one meter for living quarters, two meters for parking stalls)? Are there limits?

RESPONSE:

This response addresses both BCUC Staff IRs 2.1.1 and 2.1.4.1.

There are no set limits to the number of meters under the same Customer account, as long as the parking stalls, garage areas, storage areas, similar areas, or spaces are used in conjunction with the living quarters of the Customer, thereby falling under the amended definition of Dwelling.

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Under the proposed amendment, Customers can request separate meters for different parts of a Dwelling. BC Hydro, however, has the discretion to allow or disallow a Customer's request for separate metering in one Dwelling in consideration of whether it is practical or has business or technical reasons for BC Hydro to measure all consumption in one Dwelling with one meter. For example, a Customer's request to separately meter a bedroom within a Dwelling would not likely be allowed, while separate metering for separate spaces, for example, for parking garages or storage units, may be allowed.

Where additional separate metering has been permitted for one Dwelling, the Customer will be billed in aggregate where the Customer is served under Rate Schedule (RS) 1101 or RS 1107.

Customers are responsible for all the applicable Service Connection charges and Extension Fees, in addition to the rewiring costs of the Premises.

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A Dwelling may include parking stalls, garage areas, storage areas and similar areas or spaces that are used in conjunction with the living quarters of the Customer.

- 2.1.2 Under the proposed amendment, it appears that a Customer's decision to request separate or aggregate billing will depend on the trade-off of either paying separate Basic Charges for multiple accounts or paying the higher Tier 2 rate with aggregate consumption under the same account. Please explain how the proposed Tariff amendment addresses the potential situation where a Customer may choose to switch back and forth from separate to aggregate billing, or vice versa.

RESPONSE:

BC Hydro's proposed amendment does not allow a Customer to choose between separate or aggregate billing if the Customer's consumption (from different

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meters) is at one Dwelling, billed under RS 1101 or RS 1107. In this situation, the Customer will be billed in aggregate.

The proposed amendment is intended to apply consistent billing treatment between Customers who live in single-family Dwellings and those who live in multi-unit residential buildings (MURBs) receiving Residential Service under RS 1101 or RS 1107.

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A Dwelling may include parking stalls, garage areas, storage areas and similar areas or spaces that are used in conjunction with the living quarters of the Customer.

- 2.1.3 Under the proposed amendment, based on the definition of a “Dwelling” and the description of “living quarters of a Customer”, please confirm that a Customer will not be allowed to aggregate billing for two or more residences.

RESPONSE:

Confirmed. Each residence that meets the definition of a Dwelling and is separately metered will be a separately billed account.

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A Dwelling may include parking stalls, garage areas, storage areas and similar areas or spaces that are used in conjunction with the living quarters of the Customer.

2.1.4 Please clarify whether a Customer will now be able to aggregate billing in a Dwelling with multiple meters (e.g. rental suites in single-family homes).

RESPONSE:

Separately metered rental suites will not be billed in aggregate. Aggregate billing applies only to a single Dwelling with more than one meter billed under RS 1101 or RS 1107.

In situations where there are multiple suites in a single-family Dwelling, such as basement or rental suites, and each suite meets the Electric Tariff definition of a Dwelling (i.e., it contains sleeping quarters, a kitchen and bathroom, and in which the occupants have free access to all rooms), Customers may request a separate

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meter for each Dwelling (e.g., a rental suite). The separately metered suite in this circumstance will have its own account with a separate Basic Charge and Step 1 threshold. As stated in BC Hydro's response to BCUC Staff IR 2.1.3, Customers cannot aggregate billing for separate Dwellings.

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A Dwelling may include parking stalls, garage areas, storage areas and similar areas or spaces that are used in conjunction with the living quarters of the Customer.

- 2.1.4.1 Please clarify whether a Customer will now be able to request separate meters in different parts of a Dwelling (e.g. a landlord wishing to record its tenant's electricity consumption) and have aggregate consumption billing.

RESPONSE:

Please refer to BC Hydro's response to BCUC Staff IR 2.1.1.

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A Dwelling may include parking stalls, garage areas, storage areas and similar areas or spaces that are used in conjunction with the living quarters of the Customer.

- 2.1.5 The proposed amendment pertains to Residential Services only, particularly aimed at MURB customers. Please explain whether BC Hydro has considered similar treatment for non-residential rate classes. For example, has BC Hydro considered amending the Tariff to enable a commercial strata owner to aggregate consumption billing and/or avoid the additional Basic Charge? Please explain.

RESPONSE:

At this time BC Hydro is only applying for these changes in respect of Residential Service and has not considered whether similar proposals are appropriate for other rate classes.

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The proposed amendment is intended to apply consistent treatment between Customers who live in single-family Dwellings and those who live in MURBs receiving service under RS 1101 or RS 1107, i.e., Residential Service inclining block rates. Non-residential services that are separately metered are treated as separate accounts.

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**2.0 Reference: Application, pp. 2-3
 Cost of installing and servicing meters**

On page 2 of the Application, BC Hydro states:

Under the current Tariff Terms and Conditions, BC Hydro may install additional Service Connections and Metering Equipment to a Premises... The lack of clarity and inconsistency of Tariff provisions as discussed above may potentially create barriers to the adoption of ZEVs, particularly for Customers living in MURBs.

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2.2.1 Please confirm that a Customer who requests to have installed additional Service Connections and Metering Equipment to a Premise will have to pay an extension fee. Please explain what the extension fee covers in the context of installing a meter at a MURB parking stall.

RESPONSE:

BC Hydro confirms that installation of additional Metering Equipment that requires additional Service Connections and/or Extensions will require the Customer to pay the applicable Service Connection charges and/or Extension Fees.

In the context of installing a meter at a MURB parking stall, an Extension may be required if the Customer's electrical additions, such as installing a Zero Emission Vehicles (ZEV) charger, causes either the need for the building's Service to be upgraded or an additional Service Connection to be installed.

If an Extension is required, the Customer's Extension Fee is determined in accordance with section 8.3 (Extension Fee Rate Zone I) of the Electric Tariff.

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In the case of installation of additional Metering Equipment in the existing MURB electrical infrastructure, where there is no additional Service Connection required by BC Hydro, section 11.2 (Additional Meter Charges) of the Electric Tariff would be applicable.

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2.2.1.1 Please explain if there are any potential fairness issues within the residential rate class when a Customer pays one Basic Charge for one meter vs. a Customer paying one Basic Charge for multiple meters.

RESPONSE:

Currently a Residential Service Customer who is permitted to have a separately metered outbuilding used in conjunction with a single-family Dwelling, such as a garage, is on aggregate billing with one Basic Charge, when the service is provided under RS 1101 or RS 1107. The proposed tariff amendments would allow the same treatment for a MURB Customer, i.e., to have an additional meter for their parking area where permitted by BC Hydro, and to also be billed in aggregate with one Basic Charge.

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Please also refer to BCUC Staff IR 2.2.2.1, that lays out that other factors would need to be considered in making this determination. These will be considered in a future rate design application.

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2.2.2 Please explain what costs the Basic Charge is designed to recover.

RESPONSE:

In Chapter 5 of BC Hydro’s 2015 Rate Design Application,¹ a description of the Basic Charge states that it “is intended to recover a portion of BC Hydro’s customer-related costs, which do not vary with usage”. For RS 1101 the Basic Charge recovers “45 per cent of customer-related costs”; the balance of the costs are recovered through the Energy Charge.

The following customer-related costs are partially recovered under the Basic Charge:

- **Customer Service channels (contact centre, key account management, and online);**

¹ [BC Hydro's 2015 Rate Design Application](#), page 5-41.

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- **Metering, billing, payment processing, collections and revenue assurance; and**
- **Operation, maintenance, and administration costs and distribution system costs that are classified as customer-related costs (e.g., secondary and service wires and transformers).**

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2.2.2 Please explain what costs the Basic Charge is designed to recover.

2.2.2.1 If the Customer with two meters is now paying for one basic charge, as proposed in the Application, what is the estimated forgone revenue to B.C. Hydro? If possible, please provide this estimate in the aggregate and per meter installed.

RESPONSE:

BC Hydro has not concluded whether there will be forgone revenue. BC Hydro believes there are too many variables to make a meaningful calculation comparing one Basic Charge plus increased consumption billed on a Residential Service inclining block rate versus two Basic Charges. For example, it is not known how many Dwellings will require separate metering. Further, the additional Basic Charge that is not billed with aggregate billing may be partially offset by the portion of the aggregated increased consumption billed under the Step 1 and Step 2 Energy Charges.

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2.2.2 Please explain what costs the Basic Charge is designed to recover.

2.2.2.2 Please explain whether BC Hydro has considered offering a different Basic Charge (e.g. discounted Basic Charge) to enable electricity metering in parking stalls for Customers living in MURBs.

RESPONSE:

As the proposed amendments apply to Residential Service, the same Basic Charge should apply across the Customer class. BC Hydro has not considered offering a different or lower Basic Charge to enable metering in parking stalls for Customers living in MURBs. As mentioned in the Application, the proposed tariff amendments are to facilitate the installation of ZEV chargers in MURBs. If and when BC Hydro considers changes to the Residential Service, we will review the metering and billing treatments, including the application of the Basic Charge and Energy Charges.

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2.2.2 Please explain what costs the Basic Charge is designed to recover.

2.2.2.3 How should the BCUC ensure that the Basic Charge remains appropriate in light of the proposed amendments? Should this matter be reviewed in a future rate design application or in some other process? Please explain.

RESPONSE:

The proposed amendment to aggregate the billing is intended to provide consistent treatment of Customers in a single-family Dwelling and Customers in a MURB, where the consumption cannot be practically measured through one meter and the Customer is billed on a Residential Service inclining block rate. The Customer is billed one Basic Charge in this circumstance and receives one Step 1 threshold for the aggregated consumption.

BC Hydro agrees that consideration of the Basic Charge is best reviewed in a future rate design application when BC Hydro considers Residential Service rates in the context of the Energy Charge, i.e., not a review of the Basic Charge in isolation.