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April 28, 2023

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

Dear Patrick Wruck:

**RE: British Columbia Utilities Commission (BCUC or Commission)
 British Columbia Hydro and Power Authority (BC Hydro)
 Fiscal 2023 Fourth Quarter (Q4 F2023)
 Summary Report of Customer Complaints and Consecutive Estimates**

BC Hydro writes to submit its Q4 F2023 Summary Report of Customer Complaints and Consecutive Estimates.

Customer Complaints

Table 1 Total Complaints Volume from All Sources and BCUC

	Q4 F2022	Q1 F2023	Q2 F2023	Q3 F2023	Q4 F2023
Total Complaints*	138	93	137	109	118
BCUC	18	15	24	28	11
*Total Complaints include complaints received through the BCUC					

The total number of customer complaints increased from 109 in Q3 F2023 to 118 in Q4 F2023. The increase could be attributable to higher credit and billing complaints due to higher bills from cold winter weather, as well as from those who did not qualify for the Government's Cost of Living Credit.¹

¹ Residents who did not qualify include those who: receive their utilities from a re-seller, have more than one account in their name (one credit is provided for customers with multiple accounts), are serviced by other Utilities, or did not have an active account from October 1 to December 1, 2022.

Complaints received through the BCUC decreased from 28 in Q3 F2023 to 11 in Q4, which is below historical volume from the past year. This could be due to the winter moratorium and fewer disconnections.

Table 2 Response Time to Customer Complaints

	Q4 F2022	Q1 F2023	Q2 F2023	Q3 F2023	Q4 F2023
Average Response Time (Days)	3	3	3	3	3

The average response time to customer complaints in Q4 F2023 was three days. The majority of complaints were investigated and responded to within five business days. Complex investigations involving multiple departments were investigated and responded to within ten business days.

Table 3 Complaints by Source

	All Sources									
	Q4 F2022		Q1 F2023		Q2 F2023		Q3 F2023		Q4 F2023	
BC Hydro	74	54%	40	43%	72	53%	43	39%	45	38%
BCUC	18	13%	15	16%	24	18%	28	26%	11	9%
Better Business Bureau	6	4%	4	4%	5	3%	3	3%	7	6%
Government*	39	28%	34	37%	36	26%	34	31%	55	47%
Media and Other	1	1%	0	0%	0	0%	1	1%	0	0%
Total	138	100%	93	100%	137	100%	109	100%	118	100%

*Government represents Office of the Minister, MLA, and Ombudsperson

The largest number of complaints were received by BC Hydro with 45 (38% of the total) in Q4 F2023. This is followed by complaints received through Government with 55 (46% of the total) and the BCUC with 11 (9% of the total).

Of the 55 complaints received through Government in Q4 F2023, ten were received from MLA offices, 43 from the Office of the Minister, and two from the Ombudsperson's office.

Table 4 Complaints by Category – All Sources

	All Sources									
	Q4 F2022		Q F2023		Q2 F2023		Q3 F2023		Q4 F2023	
Credit	17	12%	20	22%	30	22%	15	14%	20	17%
Billing and Payments	24	17%	13	14%	10	8%	12	11%	27	23%
Customer Crisis Fund	11	8%	5	5%	2	1%	4	4%	3	2%
SMI	4	3%	3	3%	2	1%	4	4%	1	1%
Non-Customer Service	29	21%	33	36%	85	62%	57	51%	47	40%
Other	53	39%	19	20%	8	6%	17	16%	20	17%
Total	138	100%	93	100%	137	100%	109	100%	118	100%

Table 5 Complaints by Category – BCUC

	BCUC									
	Q4 F2022		Q1 F2023		Q2 F2023		Q3 F2023		Q4 F2023	
Credit	2	11%	4	27%	14	58%	3	11%	7	64%
Billing and Payments	7	39%	2	13%	4	17%	4	14%	2	18%
Customer Crisis Fund	0	0%	0	0%	0	0%	0	0%	0	0%
SMI	2	11%	0	0%	1	4%	2	7%	0	0%
Non-Customer Service	1	6%	7	47%	3	13%	17	61%	2	18%
Other	6	33%	2	13%	2	8%	2	7%	0	0%
Total	18	100%	15	100%	24	100%	28	100%	11	100%

The Non-Customer Service category totaled 47 complaints (40% of the total) in Q4 F2023. There were 12 Design complaints, largely related to service connection delays or costs, and 15 Field complaints on a wide range of matters such as the Streetlight Replacement Program, vegetation, and poles. There were nine complaints related to Conservation and Energy Management, mainly resulting from program rebates. Of the 20 Other category complaints, three were due to reliability of service and 15 were about Rates, most of which were specifically about how we charge our residential customers. There were three complaints about the moratorium on new cryptocurrency service connections in accordance with the Direction to the British Columbia Utilities Commission Respecting Cryptocurrency Mining Projects (Order in Council No. 692/2022) and BCUC Order G-390-22A.

Of the 11 complaints received by the BCUC in Q4 F2023, two were related to Billing and Payments and seven were related to Credit, six of which were due to disconnections. The two Non-Customer Service category complaints were related to Design.

Consecutive Estimates

In Q4 F2023, the number of Consecutive Estimates increased to 9,088 compared to 7,608 in the previous quarter. For March 2023, 99.0% of bills were issued based on actual reads, which is a 0.5% decrease compared with December 2022.

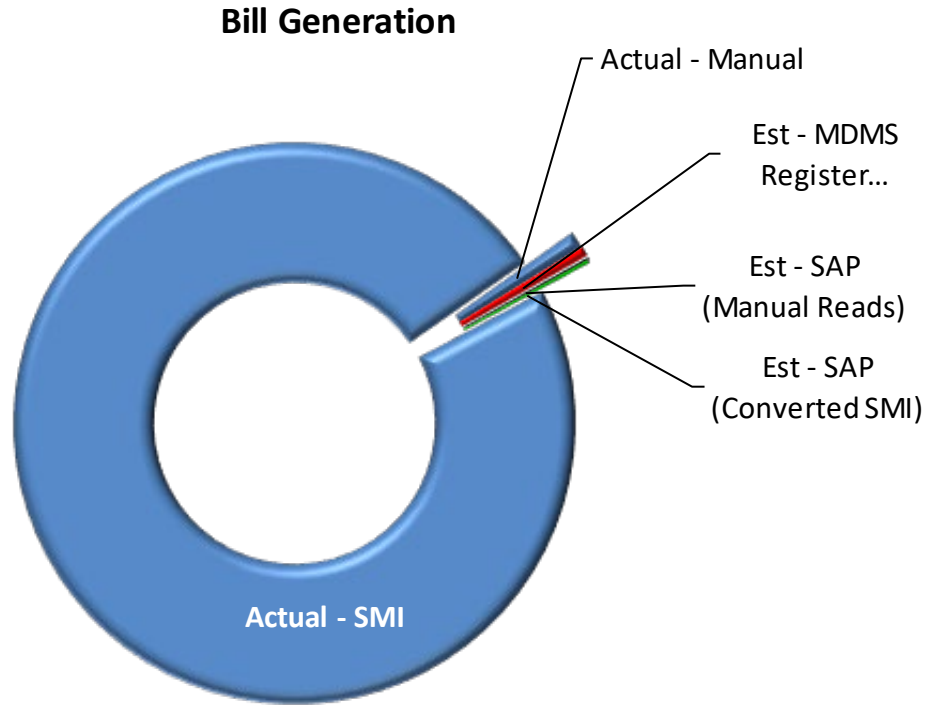
Two systems are currently utilized by BC Hydro to estimate reads for billing when actual reads are unavailable: Meter Data Management System (**MDMS**) and SAP. MDMS will provide an estimate based on actual reads if there are two or more reads available within the lookback window (the lookback window is the number of days preceding the bill date). If MDMS is unable to provide an estimated read for billing, SAP will estimate the read based on historic consumption.

On February 13, 2023, in preparation for the introduction of time of use billing, the MDMS lookback window was changed from 14 days to 90 days. Analysis of this change prior to its introduction concluded that the additional estimates created by MDMS (those with two reads between 15 and 90 days preceding the bill date) would be more accurate than SAP estimates overall. More estimates will now be created in MDMS, and customer bills should be just as accurate; however, since the lookback window has been expanded, MDMS estimates should no longer be considered as accurate as actual reads. This change in logic regarding the lookback window will not impact consecutive estimates, as the only change is that the estimate will come from MDMS rather than SAP.

Removing MDMS estimates from the calculation of bills based on actual reads resulted in a 0.5% decrease, and it is expected that BC Hydro will report bills on actual read results of approximately half a percent lower than in prior years as a result of the change.

[Figure 1](#) below identifies the sources of meter reads (converted and manual reads) that received actual versus estimates for March 2023.

Figure 1 Sources of Meter Reads for Invoices Issued, March 2023



Bill Issued Using:	March, 2023		
	Volume	%	%
Actual – SMI	1,579,444	98.1%	99.0%
Actual – Manual	15,612	1.0%	
Estimate – Register Estimate	9,248	0.6%	
Est - SAP (Manual Reads)	2,687	0.2%	1.0%
Est - SAP (Converted SMI)	3,443	0.2%	
Total	1,610,434	100%	100%

Note: Total does not reconcile to other tables and figures because:

- Results include all estimates, not just consecutive estimates (i.e., reflects accounts with only one estimate); and
- This view includes bills issued while the data for other charts is based on the reading of meter registers. In some cases, multiple meter registers are read but a single bill is issued (e.g., a poly-phase meter with scheduled reads for kWh, kW, and kVARh).

Assessment of Meter Reading Performance

In March 2023, 9,088 scheduled meter readings were unable to be obtained for a second billing period in a row. Therefore, the associated accounts required consumption estimates to ensure timely delivery of bills to customers.

Table 6 Consecutive Estimates by Meter Reading Category – Q4 F2023

	Dec 2022	Mar 2023
Accounts with Automated Reads – last read SAP Estimate	3,180	2,487
Accounts with Automated Reads – last read ISAIM/Register Estimate	1,142	1,986
Accounts with Manual Reads – last read SAP Estimate	3,286	4,615
Total	7,608	9,088

SAP estimates that are based on monthly historical data accounted for 7,102 of these bills. The remaining 1,986 were Register Estimates.

The 19% increase in total Consecutive Estimates this quarter is due to a 74% increase in MDMS Estimates for meters on automated billing and a 40% increase in SAP Estimates for manually read meters. SAP estimates for automated meters decreased by 22%. The increase in MDMS estimates and the simultaneous decline in SAP estimates for automated meters are related to the change in MDMS estimate parameters discussed above, which results in more meters meeting the criteria for MDMS estimates than previously (replacing what would have been an SAP estimate for those meters). It is expected that SAP estimates will make up an increasingly small percentage of estimates of automated meters. The increase in Consecutive Estimates for manual reads is consistent with seasonal trends and can be attributed to poor weather conditions, which are persisting particularly in the north and interior regions of the province.

Table 7 Causes of Missed Reads by Number of Estimates

Category	2-3 Estimates		4-5 Estimates		6+ Estimates		Grand Total	
	Meters	(%)	Meters	(%)	Meters	(%)	Meters	(%)
Customer Impact Nil / Low								
Vacant	316	6	209	19	1,239	42	1,764	19
Disconnected	53	1	29	3	248	8	330	3
Customer-Side Power Outage	56	1	98	10	740	26	894	10
Subtotal	425	8	336	31	2,227	77	2,988	33
Meter Replacement	451	9	208	19	201	7	860	9

Category	2-3 Estimates		4-5 Estimates		6+ Estimates		Grand Total	
	Meters	(%)	Meters	(%)	Meters	(%)	Meters	(%)
Estimated Automated Reads								
Intermittent Comms – MDMS	1,620	31	55	5	1	0	1,676	18
Intermittent Comms – SAP	899	18	144	14	137	5	1,180	14
Estimated Manual Reads								
Customer Access	114	2	67	6	80	3	261	3
Other	1,406	27	176	17	241	8	1,823	20
Recently Unconverted	225	4	70	7	5	0	300	3
Grand Total	5,140	100	1,056	100	2,892	100	9,088	100

[Table 7](#) above summarizes the causes of all missed meter reads that resulted in bills issued based on consecutive estimates in Q4 F2023, including automated and manually read meters.

The largest category, at 33%, has low or no customer impact. This category includes accounts that are vacant (19%), services with the line side breakers turned off (10%), and disconnected services (3%).

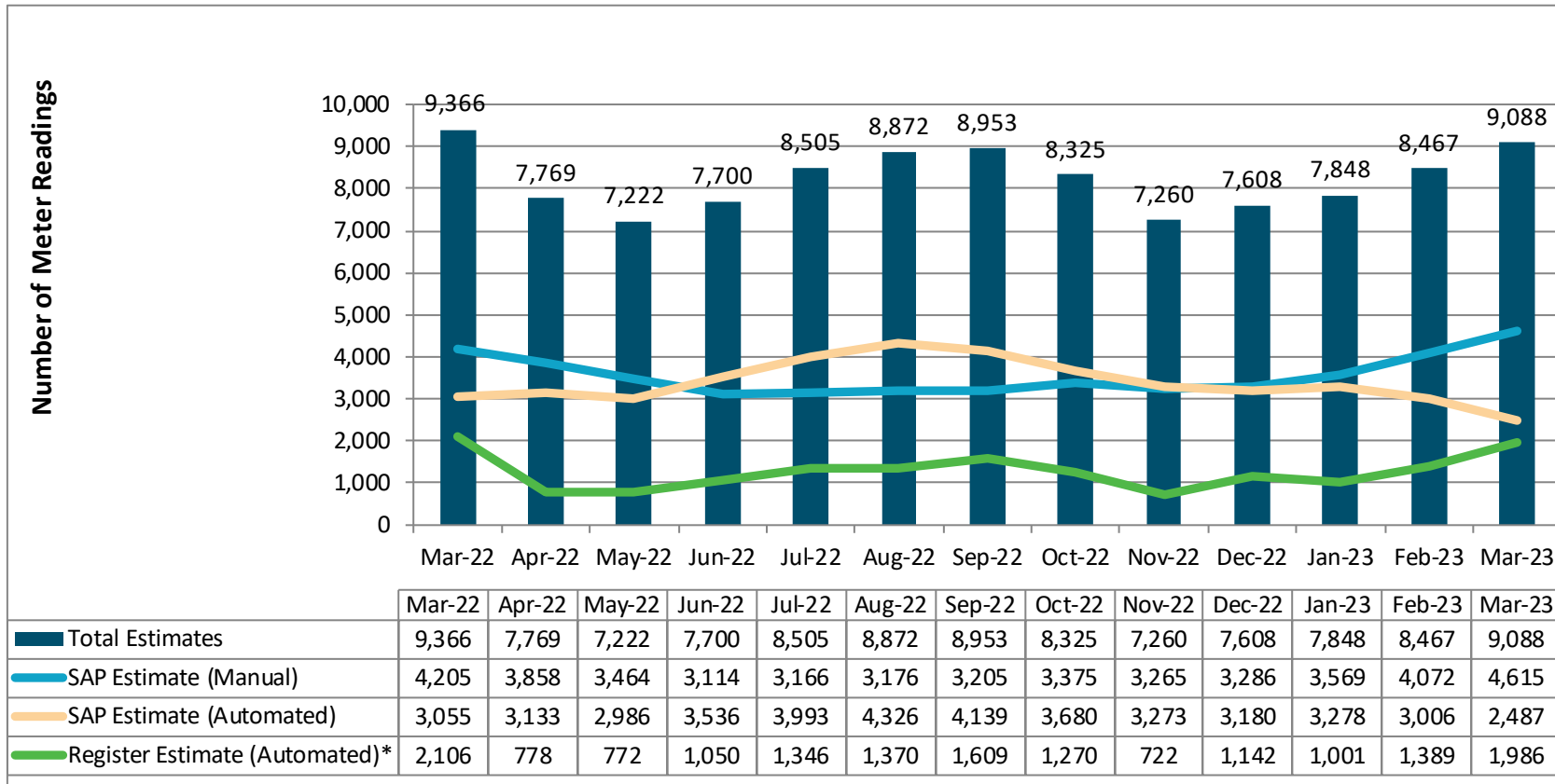
The second largest category contributing to the overall number of consecutive estimates is intermittent communications of automated meters, which accounts for 32% of estimated reads and includes MDMS (ISAIM/Register estimates [18%]) and SAP estimates (14%).

The largest category of consecutive estimates for manually read meters is Other, which comprises 20% of all consecutive estimates. Nearly 80% of these are related to inability to access meters due to poor weather conditions and meters isolated by snowfall.

Three categories make up the remaining 15% (meter replacement [9%], customer access for manually read meters [3%], and newly unconverted meters that have not yet received a manual read [3%]).

For those meters with six or more consecutive estimates, the most significant causes are vacant accounts (42%) and customer-side power outages (26%). These two categories, along with disconnected meters (8%), comprise 77% of accounts with six or more consecutive estimates and do not impact customer billing.

Figure 2 Meter Readings Requiring Two or More Consecutive Estimates, March 2022 to March 2023, Converted and Non-Converted Meters



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For further information, please contact Frankie Vaide by email at bchydroregulatorygroup@bchydro.com.

Yours sincerely,



Chris Sandve
Chief Regulatory Officer

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