Transmission Service Rate Design Workshop





Workshop Objectives



Why? Review and get feedback on proposals for transmission service rates and new optional rates for load attraction and retention



What? Review and get feedback on key rate design elements (eligibility, pricing, terms, etc.)



How? Review and get feedback on the regulatory and consultation process in support of rate applications to the BCUC



Feedback Requested

Verbal feedback given today Feedback form and/or written submission

Inform rate design criteria and options for further analysis



Agenda

Time	Item	Speakers
8:45 am	Welcome and Opening Remarks	Keith Anderson, Vice President, Customer Service
9:00	Rates PrimerOverview of existing transmission rates	David Keir, Manager Large Customer Rate Operations
9:15	 RS1823 Pricing Principles Background Feedback on status quo proposal 	Anthea Jubb, Manager Tariffs
9:45	 Market Reference Priced Rates Freshet Rate: Year 3 results, items for review Review and discussion of rate design elements for annual option 	David Keir Manager, Large Customer Rate Operations
10:30	• Break	
10:45	 Load Attraction Rate Background and jurisdiction review Review and discussion of rate design criteria 	Anthea Jubb, Manager Tariffs Allan Chung, Regulatory Specialist
11:30	 Load Retention Rate Background and jurisdiction review Review and discussion of rate design criteria 	David Keir Manager, Large Customer Rate Operations
noon	Closing and Next Steps	Fred James Chief Regulatory Officer



Opening Remarks

Keith Anderson

Vice President Customer Service



Current state assessment

Key pressures:

- 1. Declining industrial load
- 2. Energy-intensive, resource-dependent customer base





Historical Industrial Load





Strategic focus



Key initiatives



- Business development focus / streamlined interconnections
- Leverage brownfield and greenfield sites with spare capacity
- Innovative rate options for industrial customers

Corporate Priority: Make it easier for customers to do business with us



Rates primer: Transmission service rates for electricity supply

Manager Large Customer Rate Operations

David Keir,



What's in BC Hydro's toolbox?



Supply rate billing determinants

COST REFLECTIVE RATES





Electricity supply rates – service characteristics

Non-firm service

BC Hydro only supplies if energy and capacity is available

BASELINE

Load

Firm service

BC Hydro has obligation to ensure sufficient generation and system capacity to serve load

Electricity service provided in accordance with standard Electricity Supply Agreement



Interruptible

Reference Demand)

to firm service level (i.e., ESA Contract Demand or CBL

Transmission Voltage Service Portfolio



Illustrative opportunity assessment for new rates



Illustrative, simplified economics





Guiding principles

- **1. No Harm** Ratepayers are no worse off or better off (*participants and non-participants*)
- **2. No Undue Discrimination** (rates are fair, cost reflective, free from controversy)

3. Rates are practical to implement and accepted by customers (simple, pragmatic, match customer needs)



Rate Schedule 1823 (Stepped Rate) Pricing Principles

Anthea Jubb, Manager Tariffs



Outline

- 1. Overview of RS 1823
- 2. RS 1823 Pricing Principles Background
- 3. Rate Impacts of Re-pricing RS 1823 Energy Charges
- BC Hydro's RS 1823 Pricing Principles Proposal for F2020



Overview of RS 1823 Stepped Rate

- RS 1823 is the default rate for BC Hydro's transmission service rate customers
- Introduced April 2006 pursuant to government direction
- Two step inclining block rate for energy to promote conservation
- Tier 2 rate set to reflect long-run marginal cost of new energy supply
- Flat rate for peak kVA demand



Energy pricing based on cumulative annual consumption relative to annual baseline (Annual Energy CBL)

- Up to 90% of CBL = Tier 1
- > 90% of CBL = Tier 2



RS 1823 Pricing Principles: Background

- Re-pricing refers to adjusting the prices of the various components of the rate (e.g. demand and/or energy charges), without changing the total revenue from the rate class
- Re-pricing may be undertaken periodically to better align the rate components with costs and with Bonbright rate design principles
- BCUC approves the pricing principles and any resulting re-pricing of RS 1823 energy and demand charges (subject to applicable government direction)
- Re-pricing may change the electricity bills of individual customers
- Current RS 1823 pricing principles expire March 31, 2019
- F2020 RS 1823 Pricing Principles Application to the BCUC planned for winter 2018/19



RS 1823 Repricing: 2015 Rate Design Application

Commission approved pricing principles for RS 1823 Stepped Rate:

For F2017:

- Tier 2 energy rate set to lower end of BC Hydro's long run marginal cost of energy (LRMC)
- Tier 1 energy rate picked up general rate increase

For F2018 and F2019:

• Tier 1 and Tier 2 rates increased equally by the general rate increase

Rate Schedule 1823	F2016	F2017	F2018	F2019
BC Hydro General Rate Increase	6.00%	4.00%	3.50%	3.00%
RS1823 Energy Charges				
RS 1823 Energy Charge A (\$/MWh)	43.03	44.75	46.31	47.70
RS 1823 Tier 1 Rate (\$/MWh)	38.36	39.81	41.20	42.44
RS 1823 Tier 2 Rate (\$/MWh)	85.04	89.20	92.32	95.09
RS1823 Demand Charge (\$/kVA)	7.340	7.634	7.901	8.138



Rate Impacts of Re-pricing RS1823 Energy Rates

- BC Hydro's updated long run marginal cost of energy may be lower than the value used in the 2015 RDA
- If so, then re-pricing Tier 2 lower may result in better alignment with marginal costs
- However, re-pricing the Tier 2 rate lower would necessitate increasing the Tier 1 rate higher

Illustrative Rate Impact of Re-pricing Tier 2 downwards in F2020 (Assuming 2.0% General Rate Increase and no Demand Charge Re-pricing)

		Status Quo Pricing Principles				Reprice Tier	2 to:		
				\$80/N	1Wh	\$70/MW	/h	\$60/I	MWh
	F2019	F2020	%	F2020	%	F2020	%	F2020	%
RS 1823	(c/kWh)	(c/kWh)	change	(c/kWh)	change	(c/kWh)	change	(c/kWh)	change
Tier 1 rate	4.244	4.329	2.0%	4.518	6.5%	4.629	9.1%	4.74	11.7%
Tier 2 rate	9.509	9.699	2.0%	8.00	-15.9%	7.00	-26.4%	6.00	-36.9%



BC Hydro RS 1823 Pricing Proposal for F2020

- BC Hydro proposes status quo pricing principles for F2020
 - No change to the Tier 1 rate, Tier 2 rate or demand charge as a result of repricing. Any F2020 RRA increases would be applied equally to each of the Tier 1 rate, Tier 2 rate and demand charge
- This proposal would provide rate and bill stability, and be practical to implement
- We believe this proposal would also have customer understanding and acceptance, and seek your input on this.
- If supported, BC Hydro will file an application with the Commission for approval of this proposal
- Consultation on pricing principles for F2021 and beyond planned for next year

Do you support maintaining status quo RS1823 pricing principles for F2020?



Questions





Market Reference Priced Rates (seasonal): RS 1892 Freshet Rate Pilot

Manager, Large Customer Rate Operations

David Keir



Freshet Rate Pilot

SYSTEM:

Well-designed to absorb large seasonal inflows, but seasonal EPA power increases total gen supply



Freshet Period: 01 May – 31 July



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Stepped rate overlay and service distinction

Optional non-firm service under RS1892 for incremental load



Short-run marginal cost
Daily market price

signal to increase use

Energy and Demand Baselines approved by Commission

Firm service base load under RS1823



Annual price signal for conservation and efficiency

Long-run marginal cost



ICE Index: Day Ahead Mid-C Power Price reference



Baseline determination



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- 1. Review data from most recent freshet periods prior to participation
- 2. Confirm "normal" consumption in consultation with customer
- 3. File electricity baselines with Commission

Adjust to remove impact of unique events



Baseline determination example

HLH: 6am – 10pm, Mon-Sat Excludes Sundays and stats

LLH: All other hours

01 May 2017 - 31 July 2017	Hours	Energy (kWh)
High Load Hours (HLH)	1,232	50,119,189
Low Load Hours (LLH)	976	39,558,053
PERIOD TOTAL	2,208	89,677,242

	kWh/hr Ave.
High Load Hours (HLH)	40,681
Low Load Hours (LLH)	40,531

Monthly Invoice Check:

Month	Billing	Pe	riod	Billed Energy (kWh) Bill	ed demand (kV.A)
May 2017	30 April	-	May 31	29,346,862	41,843
June 2017	31 May	-	June 30	28,360,229	50,566
July 2017	30 June	-	July 31	31,970,151	51,073
Total				89,677,242	143,482

Average	kV.A

Reference Demand 47,827



How the Freshet rate works



Freshet rate: seasonal billing example (illustrative)



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Freshet Rate Pilot – Preliminary Results Summary (Years 1-3)

RS1892 SUMMARY OF RESULTS	YEAR 1	YEAR 2	YEAR 3
	May - July 2016	May - July 2017	May - July 2018
# of Participant Customer Sites	39	44	45
RS1892 energy sales (MWh)	139,064	168,400	150,383
Average incremental load (MW/hr)	63.0	76.3	68.1
Average unit cost of market-priced energy (\$/MWh)	\$ 21.88	\$ 19.50	\$ 23.81
RS1892 energy revenue (\$M)	\$ 3.0	\$3.3	\$3.6
Plus \$3/MWh wheeling fee on energy volume (\$M)	\$ 0.4	\$ 0.5	\$ 0.5
Plus 5% rate rider (\$M)	\$ 0.2	\$ 0.2	\$ 0.2
Total RS1892 energy sales	\$ 3.6	\$ 4.0	\$ 4.2
Ave. TOTAL unit cost of Freshet Rate energy (\$/MWh) excluding taxes	\$ 26.12	\$ 23.63	\$ 28.15



Freshet rate economics

Marginal resource used to serve incremental load is either Mid-C or large basin system generation

SYSTEM CONDITION

SELL System Minimum Generation (market export)

- o Incremental RS 1892 sales reduce forced market exports
- BCH gains: Avoided wheeling fees and transmission losses

BUY System Minimum Generation (market import)

- o Incremental RS 1892 sales result in increased market imports
- o BCH loses : Incurred wheeling fees and transmission losses

HOLD Energy supplied from large basin reservoirs on the margin

- o Incremental RS 1892 sales are served from basin generation
- BCH gain / (loss) = RS 1892 Tariff System Marginal Value (modeled price)

\$3/MWh 'wheeling rate' helps to mitigate price risk from variable system conditions



Freshet Rate: Questions for Comment and Feedback

GENERAL

- 1. Do you think BC Hydro should continue to offer Freshet Rate service? Why/why not?
- If yes, do you think BC Hydro should apply to have the Freshet Rate: (a) made permanent; or (b) extended for a further 3 year pilot period?

RATE DESIGN CONSIDERATIONS

- a) Period to which the rate applies (e.g., replace July with April?)
- b) Price floor (currently \$0/MWh)
- c) Wheeling rate (currently \$3/MWh, nomenclature?)
- d) Billing methodology (e.g., monthly ratio vs seasonal ratio)
- e) Baseline adjustment provisions (increases and decreases)
- f) Baseline determination for new customers with limited history
- g) Baseline assignment / intra-period ownership transfer = automatic opt-out



Market Reference Priced Rates (annual):

RS xx Incremental Energy Rate

Manager, Large Customer Rate Operations

David Keir



Example - Real Time Pricing Rate (RTP): RS 1848



PURPOSE:

Load attraction - serve incremental electricity

Load retention - serve "at risk" portion of historic load

BACKGROUND AND CONTEXT

- BC Hydro had surplus electricity
- Market prices were (generally) lower than embedded cost tariff prices
- Market access considerations ... prospective de-regulation

RTP SUMMARY

- RTP rate (RS 1848) approved in 1996 on a 1-yr pilot basis
- Application for ongoing rate (with modifications) approved in 1997
- Provided for non-firm, interruptible service at market-based prices
- BCH would make no new investments to assure delivery of RTP service
- Customer must apply to Commission for permission to access rate and for approval of Supplementary ESA
- RTP was terminated in 2005



1997 RTP - How it Worked



Proposed principles for annual market-reference priced rate

Working title: "Incremental Energy Rate"

KEY RATE DESIGN PRINCIPLES:

- 1. Provide annual option for incremental marketreference priced electricity (non-firm service)
- 2. Fair, consistent, transparent design and customer application
- 3. Optimize benefits to all ratepayers (participants and non-participants)

RS 1823 STEPPED RATE OVERLAY

- Provide base (firm service) electricity supply under TS5 and RS 1823
- Use customer-specific baselines (CBL) of historical load to determine incremental use

MARKET PRICING PRINCIPLES:

- Available daily access to market price information
- Transparent determined in a market with active trading
- Accurate index is accurate reflection of market prices
- Verifiable index prices can be readily verified



'Strawman' rate design proposal for review and discussion purposes:

Criteria	Incremental Energy Rate
Service type:	Non-firm, interruptible (to extent BCH has available energy and capacity)
Eligibility:	Existing RS 1823 customers
Size:	5 MW minimum ESA Contract Demand
Contract Term:	1 year, effective April 1st
Notice:	Written notice of intent to participate by 01 March
Baselines:	Energy CBL (HLH and LLH) and Reference Demand, by calendar month
Baseline Determination:	Most recent annual period (365 days of historical RS 1823 electricity use)
Baseline Adjustment:	Per TS 74 criteria, with Commission approval
Energy Pricing:	ICE Index: Day ahead Mid-C for On-Peak (HLH) and Off-Peak (LLH)
Demand Charge:	No demand charge for load above Monthly Reference Demand
Risk Adjustment Factor:	\$/MWh monthly adder based on BPA wheel fee (with seasonal adjustments)
Rate Structure underlay	RS1823 pricing = lesser of baseline or actual electricity use (calculated hourly)
Rate Structure overlay	RSxxxx pricing = daily net incremental energy x daily Mid-C price (HLH and LLH)
Interruptibility + Notice:	Reduce load to baseline with 2hr minimum notice requirement
Penalty for Non-compliance:	150% x daily market price for energy > baseline during Interruption Period
Special Condition 1:	No dual participation in Freshet Rate and Incremental Energy Rate
Special Condition 2:	Opt-out at any time; no re-bill for completed Billing Periods; no in/out privileges



Summary Questions for Feedback

- a. Do you think BC Hydro should offer an annual market-referenced price rate to provide a non-firm service option for incremental electricity use? Why or why not?
- b. Do you agree or disagree with the high-level summary of proposed rate design and pricing principles? (slide 41)
- c. Do you generally agree or disagree with the "strawman" rate design proposal? (slide 42)
- d. What are the key issues and risks that you see with this rate concept?



Load Attraction Rate





Outline

- 1. Load Attraction Rate Overview, Objectives and Justification
- 2. Jurisdiction Review for Load Attraction and Retention Rates
- 3. Load Attraction Rate Potential Pricing
- 4. Load Attraction Rate Potential Availability
- 5. Load Attraction Rate Potential Term, Caps, Performance Monitoring and Evaluation



Load Attraction Rate Overview

- BC Hydro is currently forecasting an energy surplus
- BC Hydro's transmission service load has been declining
- The current environment provides opportunities to attract new loads and to diversify industrial customer base
- Large customers may have choices in where to invest new plant and electricity price may be critical factor in their decision making
- Several utilities offer competitive electricity prices to attract new loads



Load Attraction Rate Objectives

- Attract new large transmission service loads by providing discount to default firm service rate
- Maximize benefits to both participants and rate payers given BC Hydro's current surplus
- Prevent costs from being imposed on existing customers by providing ratepayer protection



Load Attraction Rate Justification

- 1. Load Attraction Rate revenue covers the marginal energy cost and in addition provides a contribution to fixed costs
 - All ratepayer's receive a benefit from contribution to fixed cost (i.e., demand and customer-related cost), which would not occur in absence of the rate
 - The cost of service is recovered over the longer term after the customer returns to standard RS 1823 electricity pricing
- Target new transmission service rate customers who would not otherwise locate in BC Hydro's service territory <u>but for the discount</u>



Jurisdiction Review for Load **Attraction and Retention Rates**

Utility	Offer	Availability	Justification
Hydro Quebec, 2015 to current	Firm electricity supply discounted by between 20% to 5% from default rates ending 2027	New and expanding facilities > 1MW	 Ratepayer benefits due to efficient use of surplus Provincial Economic Development
BC Hydro, RTP rate 1996 – 2006	Market-based pricing for marginal consumption. Reduced CBL for load retention and attraction	New and existing RS 1821 customers	 Improve system efficiency through increase use in surplus or decrease use in a shortage Provide mutual benefit to participating and non- participating customers
PG&E SCE Standard EDR 2005 to current	12% discount on total standard bundled charges for 5 years for load retention and attraction	Minimum load 200 kW actively pursuing out of state location or would otherwise cease operations	• Contribution to margin from customers that would not otherwise remain or locate in service territory benefits other ratepayers
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Jurisdiction Review for Load Attraction

and Retention Rates

Utility	Offer	Availability	Justification
Manitoba Hydro Surplus Energy Option 2000 to current	Surplus energy available at market prices on an interruptible basis	General service with heating or self- generation loads over 200 kW and industrial loads >1,000 kV.A Limited to 25% of total load for industrial customers without back-up facilities	• The revenue raised under the SEP program should "break-even" on an annual basis i.e., it should be approximately the same as if the power had been sold to the opportunity export market.
Nova Scotia Power Load Retention Tariff 2012	Custom offer for Port Hawkesbury Paper which pays variable incremental cost of service with positive contribution to fixed cost	Port Hawkesbury Paper	• Some contribution to fixed costs is better than other ratepayers bear all of the costs

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Load Attraction Rate Pricing

Guided by Bonbright, Principles of Public Utility Rates:

Some forms of price discrimination can be socially valuable in that they can leadto an overall reduction in the average price charged to consumers. For discrimination to be socially beneficial, certain conditions must be met. (Bonbright et al. 1988 version, pg. 177)

Load attraction rate pricing is under development. May offer a discount from standard rate (RS 1823) for the lesser of a number of years (eg. 5) or the end of the surplus, for example:



Should there be a larger discount to the energy charge only, or a smaller discount to both energy and demand charges?

Should there be a larger discount with a earlier, abrupt transition to the standard rate, or a smaller discount with a later, more gradual transition?

Load Attraction Rate – How much to discount?

Three potential approaches to determine the appropriate magnitude of the discount:

- 1. Revenues relative to embedded costs fairness to other ratepayers
- 2. Revenues relative to marginal costs economic efficiency and cost effectiveness
- 3. Rate relative to competing jurisdictions attractive to potential new load



Load Attraction Rate – How much to discount?



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Load Attraction Rate – How much to discount?

- Ensure that the rate discount is sufficient to attract new load
- Hydro Quebec 2018 Rate Comparison Report found that BC Hydro Large Power rates are fifth, behind Manitoba, Quebec, Newfoundland, and Chicago



Comparative Index of Electricity Prices Large-Power Customers

Consumption: 30,600,000 kWh/month Power demand: 50,000 kW Voltage: 120 kV

 Compare potential pricing scenarios with electricity rates in the following regions: Quebec, Manitoba, Pacific Northwest

In addition to Quebec, Manitoba and Pacific Northwest, would you suggest we analyze other regions?

Load Attraction Rate Availability

Potential Availability and Conditions

- a. Available to facilities for which the discounted electricity rate will not undermine competitiveness of existing BC Hydro customers e.g., industries that already exist in BC and are involved in producing a commodity product that is priced according to a market index would not be eligible
- b. Available to new load only

Do you support these potential availability criteria? Would you suggest others?



Load Attraction Rate Availability

Potential Free Ridership Screening Criteria

- a. Electricity costs are a substantial share of operating costs (e.g., 10%)
- b. Approval to participate in the rate predates final investment decision;
- c. Attestation by Officer of the Company that the rate was a determining factor in decision to locate facility in BC Hydro service territory
- d. Has the ability to relocate based on competitive electricity price options in other jurisdictions (criteria used under BC Hydro 1996/97 RTP rate)
- e. Not geographically dependent on a localized resource

Do you support these potential criteria? Would you suggest any others?



Load Attraction Rate Term, Caps, Performance Monitoring, and Evaluation

Potential Term and Caps:

• The load attraction rate may be open for three years only, and in each year BC Hydro may approve no more than 500 GWh of new load

Do you support using these potential terms and caps? Would you suggest other values?

Potential Performance Monitoring

• Annual monitoring of load, revenues, incremental administration costs to BC Hydro

Potential Evaluation

 Complete a net impact evaluation at the end of year three, to determine the net new load attracted, and the net benefits to ratepayers achieved using the two assessment methods (embedded cost and marginal cost)

Do you support this potential monitoring and evaluation approach? Would you suggest the monitoring and evaluation of other metrics?

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Questions





Load Retention Rate





Load Retention Rate - Eligibility Considerations

Load Retention Criteria from BC Hydro's 1996 Industrial Services Application (for RTP Rate - RS 1848)

- 1. Customers must be currently receiving service under RS 1821 with electricity costs exceeding 10% of total variable costs; and
- 2. Customers must be able to demonstrate one of the following:
 - a) Ability to self-generate; or
 - b) Ability to relocate loads to other territories; or
 - c) Inability to compete with similar producers in other territories because of electricity prices, resulting in reduced or discontinued production in BC

SPECIAL CONDITIONS FROM APPROVED RS 1848 RATE SCHEDULE:

- 1. Customer can satisfy BCH that it can reduce load to CBL within 1hr of receiving notice
- 2. Energy CBL required prior Commission approval where:
 - a) CBL determination differs from actual average electricity use over prior 3 years
 - b) CBL is reduced for load retention or economic development purposes

Load Retention Rate – CBL Adjustment Criteria for RTP (RS 1848)

CBL Reduction Principles from BCUC's 1996 Decision:

- 1. Avoid undue discrimination amongst customers in same industry
- 2. CBL reductions should be customer-specific and kept to minimum necessary to retain load
- 3. Over-riding principle should be the maximization of benefits to all customers

BC Hydro 1997 RTP Evaluation Report Findings:

- Using equivalent electricity prices available to the applicant's competitors outside of BC – or the price equivalence of an alternative fuel source – is an objective and effective way to determine the minimum level of CBL reduction required
- Applicant must demonstrate that its BC plant survival critically depends on reduced electricity cost in BC; and demonstrate diligent efforts in controlling costs for other inputs such as labour, materials, chemicals and fuels, etc.

Pricing:

- RS1821 energy and demand for baseline load
- Market-referenced prices for load > baseline BC Hydro

Load Retention Rate – Hydro Quebec

Sign-up Requirements (via written application):

- 3 years of audited financial statements
- Detailed variable costs of production (historical and forecast)
- Historical and forecast sales prices for manufactured products

Eligibility Criteria:

- Customer must demonstrate:
 - a) financial difficulties that entail cessation of all or part of its operations
 - b) it has obtained reductions from other key suppliers
 - c) steps will be taken to improve profitability

Pricing (min) for eligible load up to 100%:

- Energy charge + 10% premium
- No demand charge



Summary Questions for Feedback

- 1. Do you think BC Hydro should offer a load retention rate for existing customers who are facing financial difficulties? Why or why not?
- Is the provision of a load retention rate (i.e., some form of discounted firm service) to one customer within an industry sector where other customers pay standard tariff rates fair?
- 3. How should BC Hydro and/or the Commission determine the appropriate CBL reduction to reflect the 'at risk' portion of an existing operating customer load?
- 4. Should load for 'plant restarts' be eligible? Why or why not?
- 5. Should load for 'plant expansions' designed to extend plant operating life be eligible? Why or why not?



Closing and Next Steps





Next Steps

Engagement

- October 24, 2018: Deadline for feedback form and written submissions regarding today's workshop
- November 19, 2018: Transmission service rate design workshop #2, to include proposed pricing, availability and terms for load attraction and retention rates

Freshet Rate

- November 2018: Freshet Rate Final Evaluation Report and Application for Freshet Rate for F2020 and Beyond
- By February 28: Requested Commission approval for Freshet Rate, to allow continuation of this rate in the F2020 freshet period



Next Steps

Load Attraction and Retention Rates

- December 2018: Target filing our Load Attraction and Retention Rates Application
- January to spring 2019: Possible Streamline Review Process in February, if supported by interveners, or written process through spring 2019
- Fall 2019: Target implementation of Load Attraction and Retention Rates

RS1823 Pricing Principles

- Winter 2018/19: Application for status quo pricing principles for 2020
- Spring / summer 2019: Further development and consultation on pricing principles for F2021 and beyond





Please remember to complete feedback forms



