



**bcuc**  
British Columbia  
Utilities Commission

Suite 410, 900 Howe Street  
Vancouver, BC Canada V6Z 2N3  
**bcuc.com**

**P:** 604.660.4700  
**TF:** 1.800.663.1385  
**F:** 604.660.1102

## British Columbia Hydro and Power Authority Customer Crisis Fund Evaluation Reports

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### Decision and Order G-144-21

May 7, 2021

Before:  
W. M. Everett, QC, Panel Chair  
D. A. Cote, Commissioner  
K. A. Keilty, Commissioner

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## Executive Summary

The Customer Crisis Fund (CCF) is a British Columbia Hydro and Power Authority (BC Hydro) pilot program (CCF Pilot Program or CCF Pilot) that offers support to residential customers that are experiencing a temporary financial crisis and are facing disconnection of their BC Hydro service. The current proceeding was established to review the CCF evaluation reports filed by BC Hydro after the first and second year of the CCF Pilot Program (collectively referred to as the Evaluation Reports). This decision provides a review of the related evidence and addresses the following key issues to be decided by the Panel:

- Is there an economic or cost of service justification for the continuation of the CCF Pilot, either as a pilot or a permanent program; and
- Are there any other approaches or matters that should be considered in measuring and assessing utility and ratepayer benefits and costs associated with the CCF Pilot.

### History of the CCF Pilot Program

BCOAPO<sup>1</sup>, an intervener in the BC Hydro 2015 Rate Design Application (2015 RDA) proceeding, requested that the BCUC “implement a strategy to assist low income ratepayers who are having increasing difficulty paying their electrical bills in an environment where electricity rates continue to rise while many people’s incomes have stagnated.” As part of this strategy, the BCOAPO requested the BCUC approve a crisis intervention fund to assist BC Hydro customers who are in arrears and unable to pay their electricity bills.<sup>2</sup>

In the 2015 RDA Decision issued in January 2017, the BCUC found that it does not have the jurisdiction under the *Utilities Commission Act* to set low income rates in the absence of an economic or cost of service justification.<sup>3</sup> The BCUC was persuaded by BCOAPO’s arguments that a crisis intervention fund would not amount to a social assistance program if it could generate a utility benefit to justify it on an economic or cost of service basis. Accordingly, the BCUC directed BC Hydro to prepare and file a proposal for a crisis intervention fund pilot program for residential customers that are in arrears with BC Hydro and are unable to pay their electricity bills.<sup>4</sup>

In November 2017, the BCUC granted BC Hydro’s application for approval of the CCF Pilot Program, including the CCF Rate Rider and the CCF Regulatory Account. The CCF Pilot Program was approved for a three-year period ending May 31, 2021, to provide time to assess whether there is an economic or cost of service justification for a permanent CCF program. Initially, BC Hydro was directed to file an evaluation report following completion of the second year of the CCF Pilot<sup>5</sup>; however, BC Hydro was subsequently directed to also file an evaluation report following completion of the first year of the CCF Pilot.<sup>6</sup>

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<sup>1</sup> BC Old Age Pensioners’ Organization, Active Support Against Poverty, Council of Senior Citizens’ Organizations of BC, Disability Alliance BC, and Together Against Poverty Society (collectively BCOAPO).

<sup>2</sup> BC Hydro 2015 RDA Proceeding, BCOAPO Final Argument, pp. 2 and 67.

<sup>3</sup> BC Hydro 2015 RDA Decision, p. 80.

<sup>4</sup> *Ibid.*, pp. 96–97.

<sup>5</sup> BCUC Order G-166-17 dated November 17, 2017.

<sup>6</sup> BCUC Order G-211-18 dated November 8, 2018.

## Review of CCF Evaluation Reports

The CCF Evaluation Reports provide an overview of the results from the first two years of the CCF Pilot Program, including the set-up and operational costs, customer experience and opinion, and participant and non-participant benefits. The Evaluation Reports include the results of a study carried out by BC Hydro to test whether economic benefits of the CCF Pilot were realized.<sup>7</sup> BC Hydro acknowledges that while the CCF Pilot resulted in societal benefits, the costs of the program outweighed the savings and there is no economic or cost of service justification for making the CCF Pilot permanent. BC Hydro concludes that the CCF Pilot Program should terminate effective May 31, 2021.<sup>8</sup>

BCSEA and Zone II RPG support the CCF Pilot and the CEC<sup>9</sup> recognizes the benefits to participants. However, BCSEA, Zone II RPG and the CEC all agree with BC Hydro that the program should terminate on May 31, 2021 due to a lack of economic or cost of service justification.<sup>10</sup>

BCOAPO does not agree that the CCF Pilot should terminate and raises several issues with the methodology used by BC Hydro in its study of the economic benefits of the CCF Pilot as set out in its Evaluation Reports.<sup>11</sup>

## Findings

The Panel makes the following findings in this decision:

- The methodology employed by BC Hydro was appropriate for the purpose of determining whether the CCF Pilot Program could be justified on an economic or cost of service basis and the data set was large enough to reveal economic benefits, if they had existed;
- The CCF Pilot Program cannot be justified on an economic or cost of service basis; and
- There is insufficient evidence that there are any other approaches or matters that justify the continuation of the CCF Program.

BC Hydro acknowledges that there are societal benefits for CCF grant recipients and its survey results indicate broad public support for such a program, despite the significant number of complaints and letters of comment objecting to continuation of the CCF Pilot Program.

The Panel also recognizes the positive impact of the CCF Pilot for grant recipients, particularly for those customers that were able to maintain electricity service after receiving the CCF grant. The onset of the COVID-19 pandemic increased the need for the CCF, as demonstrated by the increase in the number of applications in March and April 2020. However, the Panel notes that generally the benefits for participants do not have a long-term affect and that it appears that the CCF Pilot, as presently designed, has not had the desired impact. BC Hydro's study of the economic benefits of the CCF Pilot shows an increasing trend, for CCF grant recipients, in the number of final notice of disconnection letters issued, disconnections and accounts closed and expensed as bad debts several months after receiving the CCF grant.<sup>1</sup> Therefore, in spite of what appears to be positive feedback, there is no evidence to suggest that continuing with the CCF Pilot Program as designed will create a desirable impact over the longer term. Further, there is insufficient evidence to suggest that there are other approaches that may create a more favourable outcome in the future.

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<sup>7</sup> Exhibit B-1; Exhibit B-5.

<sup>8</sup> BC Hydro Final Argument, p. 5.

<sup>9</sup> BC Sustainable Energy Association (BCSEA); Zone II Ratepayers Group (Zone II RPG); and the Commercial Energy Consumers Association (CEC) are registered as interveners in the CCF Evaluation Report proceeding. The other interveners are BCOAPO; FortisBC Energy Inc. and FortisBC Inc. (collectively FortisBC); Mr. Anthony Lo; and Non-Integrated Areas Ratepayers Group (NIARG).

<sup>10</sup> BCSEA Final Argument, pp. 1–2; Zone II RPG Final Argument, pp. 1, 4; CEC Final Argument, pp. 4, 6.

<sup>11</sup> BCOAPO Final Argument, pp. 1 and 15–32.

As a result of the Panel's determinations that continuation of the CCF Pilot Program cannot be justified on an economic or cost of service basis or as a result of other matters raised in in this proceeding, the CCF Pilot will terminate effective May 31, 2021, pursuant to Order G-166-17.

*Status of CCF Rate Rider Proceeding*

The BCUC approved the CCF Rate Rider and the CCF Regulatory Account effective June 1, 2018.<sup>12</sup> Subsequently in 2019, BC Hydro filed an application with the BCUC in a separate proceeding to amend the CCF Rate Rider effective October 1, 2019 from 0.82 cents per day to 0.43 cents per day. The BCUC approved the amendment to the CCF Rate Rider on an interim and refundable/recoverable basis and adjourned that proceeding pending the outcome of the current proceeding to review the CCF Evaluation Reports.<sup>13</sup>

On April 2, 2020, the Lieutenant Governor in Council (LGIC) issued Order in Council (OIC) 159 respecting COVID-19 relief, which provides, in part, that the BCUC must allow BC Hydro to defer amounts for the residential customer COVID-19 Relief Program to the CCF Regulatory Account. In addition, OIC 159 provides that the BCUC "may not exercise its powers under the Act to amend, cancel or suspend the customer crisis fund rate rider, except on application by [BC Hydro]."<sup>14</sup>

**As a result of the provisions of OIC 159, the Panel finds that the CCF Rate Rider will not automatically terminate effective May 31, 2021 pursuant to Order G-166-17 and that the BCUC does not have the jurisdiction to amend, cancel or suspend the CCF Rate Rider, except on application by BC Hydro.** Accordingly, the CCF Rate Rider remains in effect on an interim basis and the BCUC proceeding related to the CCF Rate Rider proceeding remains adjourned.

As noted by BC Hydro in its Final Argument, the CCF Regulatory Account will continue beyond May 31, 2021 in accordance with OIC 159.

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<sup>12</sup> Order G-166-17.

<sup>13</sup> Order G-194-18.

<sup>14</sup> [https://www.bclaws.gov.bc.ca/civix/document/id/oic/oic\\_cur/0159\\_2020](https://www.bclaws.gov.bc.ca/civix/document/id/oic/oic_cur/0159_2020)

## 1.0 Introduction

The Customer Crisis Fund (CCF) is a British Columbia Hydro and Power Authority (BC Hydro) pilot program (CCF Pilot Program or CCF Pilot) that offers support to residential customers that are experiencing a temporary financial crisis and are facing disconnection of their BC Hydro service. The British Columbia Utilities Commission (BCUC) approved the CCF as a pilot program to allow time to assess whether there is an economic or cost of service justification for the establishment of a permanent program.<sup>15</sup>

This proceeding was established to review the CCF Year One and the Two-Year Evaluation Reports (collectively referred to as the Evaluation Reports) filed by BC Hydro.

This decision provides a review of the Evaluation Reports and related evidence and addresses the following key issues to be decided by the Panel:

- Is there an economic or cost of service justification for the continuation of the CCF Pilot, either as a pilot or a permanent program; and
- Are there any other approaches or matters that should be considered in measuring and assessing utility and ratepayer benefits and costs associated with the CCF Pilot.

### 1.1 Background

During the BC Hydro 2015 Rate Design Application (2015 RDA) proceeding, the BC Old Age Pensioners' Organization, Active Support Against Poverty, Council of Senior Citizens' Organizations of BC, Disability Alliance BC, and Together Against Poverty Society (collectively BCOAPO), an intervener in that proceeding, requested that the BCUC "implement a strategy to assist low income ratepayers who are having increasing difficulty paying their electrical bills in an environment where electricity rates continue to rise while many people's incomes have stagnated." As part of that strategy, the BCOAPO requested the BCUC approve a crisis intervention fund to assist BC Hydro customers who are in arrears and unable to pay their electricity bills.<sup>16</sup>

In the 2015 RDA Decision, the BCUC found that it does not have the jurisdiction under the *Utilities Commission Act* (UCA) to set low income rates in the absence of an economic or cost of service justification.<sup>17</sup> The BCUC was, however, persuaded by BCOAPO's arguments that a crisis intervention fund would not amount to a social assistance program if it could generate a utility benefit to justify it on an economic or cost of service basis. Accordingly, the BCUC approved the establishment of a pilot crisis intervention fund and directed BC Hydro to file a proposal for a pilot program within six months of the date of the 2015 RDA Decision.<sup>18</sup>

The BCUC subsequently approved the BC Hydro Customer Emergency Fund Pilot Program, (later renamed to the CCF Pilot Program) effective June 1, 2018, and directed BC Hydro to file an evaluation report with the BCUC within 90 days of the completion of the second year of the CCF Pilot Program.<sup>19</sup> To provide sufficient time and flexibility to assess whether there is an economic or cost of service justification for the establishment of a permanent CCF program,<sup>20</sup> approval of the CCF Pilot Program was granted until the earlier of:

- three years from the CCF Pilot's implementation date (May 31, 2021);

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<sup>15</sup> BC Hydro 2015 RDA Decision, pp. 93–98.

<sup>16</sup> BC Hydro 2015 RDA Proceeding; BCOAPO Final Argument, pp. 2 and 67.

<sup>17</sup> BC Hydro 2015 RDA Decision, p. 80.

<sup>18</sup> Ibid., pp. 96-97

<sup>19</sup> Order G-166-17 dated November 17, 2017.

<sup>20</sup> BC Hydro 2015 RDA Order G-5-19 and Decision dated January 20, 2017, pp. 93–98.

- BCUC approval of a BC Hydro application to end the CCF Pilot; or
- issuance of a BCUC order to end the CCF Pilot.<sup>21</sup>

In response to a significant number of complaints regarding the CCF Pilot Program following its approval, the BCUC directed BC Hydro to file an evaluation report within 90 days of the completion of the first year of the CCF Pilot Program. The BCUC determined that an earlier filing of the CCF Evaluation Reports would be beneficial as it would allow for a timely evaluation of the CCF Pilot in light of ratepayer concerns and for an earlier understanding of the actual results.<sup>22</sup>

## 1.2 CCF Evaluation Reports Proceeding

This CCF Evaluation Reports proceeding was initially established to review the CCF Year One Evaluation Report.

### Filing of the BC Hydro Year One Evaluation Report

BC Hydro filed its Year One Evaluation Report for the CCF Pilot Program with the BCUC on July 31, 2019. The Report provides an overview of the results from the first year of operations (May 1, 2018 to April 30, 2019), including the set-up and operational costs, customer experience and opinion, as well as participant and non-participant benefits.<sup>23</sup>

The Panel established a regulatory timetable, including public notice, intervenor registration and submissions from BC Hydro and intervenors on whether a review of the CCF Pilot Program should be undertaken based on the contents of the Year One Evaluation Report.<sup>24</sup> BC Sustainable Energy Association (BCSEA); FortisBC Energy Inc. and FortisBC Inc. (collectively FortisBC); Mr. Anthony Lo; Non-Integrated Areas Ratepayers Group (NIARG); BCOAPO; Zone II Ratepayers Group (Zone II RPG); and the Commercial Energy Consumers Association of British Columbia (CEC) registered as intervenors in the proceeding.

BC Hydro took the position that the data from only one year of operations was based on a sample size that was inadequate to provide definitive conclusions as to the economic benefits of the CCF Pilot.<sup>25</sup>

Ultimately, the Panel agreed and found there was insufficient data in the Year One Evaluation Report to conduct a review of the CCF Pilot Program and adjourned the proceeding pending the filing of a Two-Year Evaluation Report.<sup>26</sup>

### Filing of the BC Hydro Two-Year Evaluation Report

BC Hydro filed its Two-Year Evaluation Report for the CCF Pilot Program with the BCUC, on July 31, 2020. BC Hydro states that the purpose of the Two-Year Evaluation Report is to summarize the CCF Pilot operations from May 1, 2018 to April 30, 2020, and evaluate the participant and non-participant benefits in order to examine whether there is an economic or cost of service justification for the CCF Pilot.<sup>27</sup>

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<sup>21</sup> Order G-166-17.

<sup>22</sup> Order G-211-18 with reasons for decision, dated November 8, 2018.

<sup>23</sup> Exhibit B-1.

<sup>24</sup> Order G-195-19 dated April 30, 2019.

<sup>25</sup> Exhibit B-1, p. 2.

<sup>26</sup> Order G-5-20.

<sup>27</sup> Exhibit B-5, p. 1.

## Regulatory process

Following the filing of the Two-Year Evaluation Report, the Panel found that a BCUC review of the Evaluation Reports should be undertaken as part of the current proceeding.<sup>28</sup>

The regulatory process included BCUC and intervenor information requests (IRs) to BC Hydro, an opportunity for intervenors to provide notice of their intent to file evidence and written final arguments. No intervenors filed evidence in this proceeding.

The BCUC also received 130 letters of comment from members of the public and 17 letters of comment from interested parties, which are addressed in section 2.2.2 of this decision.

## **2.0 BCUC Review of CCF Evaluation Reports**

The scope of the review of the CCF Pilot Program was established by the Panel as follows:

The scope of the review is limited to CCF Evaluation Reports, specifically the measurement of whether there is an economic or cost of service justification for the CCF Pilot Program, and any other approaches or matters that should be considered in measuring and assessing utility and ratepayer benefits and costs associated with the CCF Pilot Program.<sup>29</sup>

Section 2.1 of this Decision addresses whether there is an economic or cost of service justification for the CCF Pilot.

Section 2.2 of this decision addresses other matters raised in this proceeding, including customer experience and feedback, the precedent value of other BCUC decisions, and the contextual implications of COVID-19 pandemic.

### **2.1 Economic or Cost of Service Justification for the CCF Pilot Program**

The CCF Pilot Program was approved as a pilot program to allow time to assess whether there is an economic or cost of service justification for the establishment of a CCF Program on a permanent basis. BC Hydro submits that the CCF Pilot Program would be supportable on an economic or cost of service basis provided “the incremental program costs incurred were fully offset by economic benefits to non-participants.”<sup>30</sup>

In the Two-Year Evaluation Report, BC Hydro put forward four potential economic benefits for non-participants arising from the CCF Pilot Project:

- a reduction in lost revenue due to fewer disconnections;
- a reduction in the cost of collection notifications;
- a reduction in the cost of borrowing arising from delayed revenues; and
- a reduction in bad debt expense.<sup>31</sup>

BC Hydro carried out a study, referred to as a quasi-experimental comparison, to test whether these potential economic benefits were realized. The study compared the relative change in outcomes for a group of CCF grant

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<sup>28</sup> Order G-266-20 dated October 23, 2020.

<sup>29</sup> Order G-266-20, reasons for decision, p. 5,

<sup>30</sup> BC Hydro Final Argument, p. 4.

<sup>31</sup> Exhibit B-5, p. 28.

recipients (Test Group) and a group of similar customers that did not receive CCF grants (Matched Control Group).<sup>32</sup> Given that dunning activities, including the issuance of final notice of disconnection (FNOD) letters were suspended in March and April 2020 due to the onset of the COVID-19 pandemic, the potential non-participant benefits were assessed over a 22 month study period (May 2018 to February 2020) rather than 24 months. BC Hydro submits that this timeframe still provides sufficient data for the analysis of the economic benefits of the CCF Pilot.<sup>33</sup>

BC Hydro states that the large and relatively homogeneous population of customers eligible for a CCF grant made an experimental design with a control group appropriate for its evaluation. Specifically, the eligible group was limited to residential customers who had received any of the six types of dunning notices within the evaluation period and BC Hydro issues approximately 80,000 to 100,000 dunning notices each month. BC Hydro further explained that a quasi-experimental approach was necessary, instead of a randomized control trial (RCT), since an RCT approach would have required BC Hydro to withhold CCF grants from eligible customers to create the control group.<sup>34</sup>

BC Hydro submits that it optimized the quasi-experimental design by:

- increasing the sample size by grouping customers based on the month the CCF grant was received to create “time-aligned cohorts” spanning the middle 14 months of the study period;
- defining the population of eligible BC Hydro customers and selecting a Matched Control Group based on key parameters, such as housing type, annual consumption, and overdue amounts;
- developing four evaluation datasets (rather than two), consisting of pre- and post-CCF grant data for the Test and Matched Control Groups; and
- applying the difference in differences (DID) methodology to gain the most accuracy possible.<sup>35</sup>

BC Hydro explains its use of the DID methodology, as follows:

Although the test and control groups were matched as closely as possible with available data, some selection bias may exist, such as income disparity and whether members of the matched control group were also impacted by an ‘unplanned life event’. To limit the potentially confounding extraneous effects and selection bias, the DID technique was applied to measure the differences between the test and matched control groups over time. The DID technique effectively reduces the impact of unexplainable changes that affect both the test and matched control groups. The DID technique provides an estimate of the net effect of the CCF Pilot, controlling for the variables described above.<sup>36</sup>

FNOD letters, which are issued once a customer is considered overdue with a payment, was the key dataset used in support of BC Hydro’s analysis. Receipt of at least one of six types of FNODs determines, in part, whether a customer is eligible to receive a CCF grant. A sample size of 2,797 accounts for each of the Test and Matched Control Groups was used. BC Hydro states this is sufficient to produce statistically relevant results.<sup>37</sup>

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<sup>32</sup> BC Hydro states that no pre-test data were available regarding bad debt expenses and therefore a simple comparison between the number of bad debt cases and amounts for the Test and Matched Control Groups was used to evaluate this potential non-participant benefit.

<sup>33</sup> Exhibit B-5, p. 48.

<sup>34</sup> Ibid., pp. 2, 28, 33, 36–40; Exhibit B-8, BCUC IR 1.12.1.

<sup>35</sup> Exhibit B-5, p. 34; Exhibit B-8, BCUC IR 1.12.1.

<sup>36</sup> Exhibit B-5, p. 39.

<sup>37</sup> Ibid., pp. 3 and 37.

BC Hydro submits that the study results did not identify any statistically significant economic benefits from the CCF Pilot related to disconnection volumes, notification and collection costs, and bad debt expense.<sup>38</sup>

BC Hydro did however identify a statistically relevant economic benefit from a reduction in its cost of borrowing arising from delayed revenues. The general trend for the Test Group was a slight decrease in the amount owed during the four months following receipt of the CCF grant, while the Matched Control Group experienced a slight increase in overdue amounts. This difference translates into a savings on the cost of borrowing arising from delayed revenues of approximately \$143 per year for non-participants.<sup>39</sup>

In addition to the four potential economic benefits examined in the Two-Year Evaluation Report, BC Hydro also considered other potential economic benefits that could theoretically result from the CCF Pilot Program. These included the avoidance of costs associated with final warning calls from collections agents and a reduction in labour costs resulting from avoided disconnections. While BC Hydro did not specifically measure these benefits in its evaluation, it estimates that, in total, additional non-participant savings from the CCF Pilot Program could be as high as \$187,753 annually.<sup>40</sup>

BC Hydro submits that the ongoing costs of the CCF Pilot are on average \$1.63 million per year, comprised of ongoing operating costs and grants. This amount does not include set-up costs of \$267,271 incurred during the first year of operations<sup>41</sup>, nor does it include indirect costs related to management oversight and administration that are already performed by BC Hydro's existing staff complement.<sup>42</sup> Taking into consideration the \$143 savings per year on the cost of borrowing arising from delayed revenues for non-participants and the other unmeasured, theoretical economic benefits to non-participants of a maximum of \$187,753 annually, BC Hydro submits that "the economic benefits provided to non-participants is far less than the CCF Program Costs."<sup>43</sup>

BC Hydro concludes in the Two-Year Evaluation Report that "the evaluation of the pilot program indicates there are insufficient utility benefits to justify CCF on an economic or cost of service basis notwithstanding the potential societal benefits of the CCF."<sup>44</sup> Accordingly, BC Hydro submits that the CCF Pilot should terminate on May 31, 2021 pursuant to Order G-166-17.<sup>45</sup>

### *Position of the Parties*

The CEC, BCSEA and Zone II RPG all accept BC Hydro's methodology for evaluating non-participant benefits as appropriate and accept BC Hydro's position that continuation of the CCF Pilot Program is not supported on an economic or cost of service basis.<sup>46</sup>

BCOAPO does not accept BC Hydro's methodology and submits there are significant issues with BC Hydro's evaluation of non-participant benefits. BCOAPO states that BC Hydro's Matched Control Group failed to address issues related to income disparity and whether customers were also impacted by an "unplanned life event". BCOAPO argues that the DID methodology relied upon by BC Hydro provides an insufficient basis for estimating the economic benefits of the CCF Pilot Program to non-participants.<sup>47</sup>

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<sup>38</sup> Exhibit B-5, pp. 44, 46, 48.

<sup>39</sup> Ibid., pp. 46–47; Exhibit B-5-1, p. 48.

<sup>40</sup> Exhibit B-8, BCUC IR 1.4.3– 1.4.3.1.

<sup>41</sup> Exhibit B-5, p. 24.

<sup>42</sup> Exhibit B-8, BCUC IR 1.1.2.4.

<sup>43</sup> BC Hydro Final Argument, p. 5.

<sup>44</sup> Exhibit B-5, p. 3.

<sup>45</sup> BC Hydro Final Argument, p. 3.

<sup>46</sup> BCSEA Final Argument, p. 3; Zone II RPG Final Argument, p. 3; CEC Final Argument, p. 4.

<sup>47</sup> BCOAPO Final Argument, pp. 17–20, 23.

BCOAPO further submits that BC Hydro's estimates of savings attributable to a reduction in bad debt expense and additional theoretical savings lack sufficient detail and a better understanding of BC Hydro's assumptions is required to assess the reasonableness of the calculations.<sup>48</sup>

BCOAPO argues that economic efficiencies not currently reflected in BC Hydro's assessment could be realized in the future as BC Hydro and its customers gain additional experience with the CCF Pilot Program. More particularly, BCOAPO submits that as familiarity with the CCF Pilot Program increases, more customers would apply after receiving their first FNOD and the opportunity for savings due to reduced collection notice costs would increase.<sup>49</sup>

In reply, BC Hydro submits that the DID methodology employed is an industry standard methodology that is used extensively by BC Hydro to evaluate its programs and initiatives, such as BC Hydro's demand-side measures program.<sup>50</sup>

With respect to the CCF Pilot Program costs, BCOAPO submits that the total annualized operating costs overstate the future costs of the program for several reasons. First, the annualized operating costs include \$26,618 for program evaluation, which is not an ongoing cost. Second, if the CCF were to continue, BCOAPO states that increased familiarity with the program would reduce the overall operating costs per successful application.<sup>51</sup>

In reply, BC Hydro reiterates that the difference between the total annualized costs of the CCF Pilot Program of \$1.63 million and the maximum benefits to non-participants of \$190,000 annually, is too sizeable for further inquiry to result in a different outcome. BC Hydro also submits there are no major opportunities to further reduce the CCF program costs.<sup>52</sup>

### *Panel Determination*

In its evaluation of the of the CCF Pilot Program, the Panel considers the appropriateness of BC Hydro's methodology and whether the CCF Pilot can be justified on an economic or cost service basis.

#### *Appropriateness of BC Hydro's Methodology*

BCOAPO has raised issues regarding the appropriateness of BC Hydro's methodology for measuring whether there was an economic or cost of service justification for the CCF Pilot.

BC Hydro acknowledges that in spite of matching the test and control groups as closely as possible there was the potential for some selection bias related to income disparity and whether matched control group members were also impacted by an 'unplanned life event'. However, the DID technique was applied to specifically limit the impact of such potentially confounding extraneous effects and selection bias between the test and matched control groups.

BC Hydro observes that the population of interest was relatively homogeneous as it was limited to residential customers who had received one of the six types of dunning notices over the evaluation period. This observation and the large number of dunning notices issued each month allowed BC Hydro to employ an experimental design rather than being restricted to an evaluation utilizing a non control group methodology. BC Hydro

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<sup>48</sup> Ibid., pp. 26–27.

<sup>49</sup> BCOAPO Final Argument, pp. 22.

<sup>50</sup> Exhibit B-5, p. 28; BC Hydro Reply Argument, p. 7.

<sup>51</sup> BCOAPO Final Argument, p. 26.

<sup>52</sup> BC Hydro Reply Argument, pp. 7–8.

considered other experimental designs such as RCT but acknowledged that this would have required it to withhold CCF grants from eligible customers. This necessitated the use of a quasi-experimental approach.

Given these circumstances, **the Panel finds that BC Hydro's decision to employ a quasi-experimental methodology requiring a non-random approach to the development of a control group was reasonable.**

The employment of the quasi-experimental approach allowed all eligible customers to participate. However, as noted by BC Hydro, it does present challenges with bias between test and control samples. The Panel notes that these concerns were addressed by BC Hydro by developing multi evaluation datasets, dividing the participants into monthly time aligned cohorts thereby increasing sample size, selecting the matched control group on key parameters thereby reducing selection bias and applying the DID methodology.

As noted above, the Panel accepts the quasi-experimental approach as employed by BC Hydro. While this methodology is not perfect, the Panel is satisfied that BC Hydro has taken appropriate steps to ensure that test and matched control groups were drawn from a sufficiently large population and are reasonably comparable. The steps employed by BC Hydro minimize bias. **Therefore, the Panel finds on the evidence that (1) the methodology employed by BC Hydro was appropriate for the purpose of determining whether the CCF Pilot Program could be justified on an economic or cost of service basis; and (2) the data set was large enough to reveal economic benefits, if they had existed.**

#### *Economic or Cost of Service Justification for the CCF Pilot Program*

As noted above, the BCUC approved the CCF as a pilot program to allow time to assess whether there is an economic or cost of service justification for the establishment of a permanent program.

BC Hydro's analysis establishes the costs of the CCF Pilot Program to be on average \$1.63 million per year, which includes ongoing and incremental operating costs and grants. Indirect costs related to management oversight and administration and set-up costs incurred during the first year of operations are not included in the estimated ongoing costs of \$1.63 million per year.

BCOAP's position is that the ongoing costs may be overstated for future years. While the Panel agrees that there may be opportunities for some amount of cost reductions in future, there is insufficient evidence to indicate that program costs could be reduced to a level more comparable to the estimated economic benefits of the program.

**Given that the indirect costs have not been allocated to the CCF Pilot Program and the lack of evidence pointing to any significant future cost savings, the Panel finds that \$1.63 million per year represents a reasonable estimate of the average, ongoing annual costs for the CCF Pilot Program.**

Regarding measurement of economic benefits of the CCF Pilot Program for non-participants, BC Hydro's analysis of the four potential economic benefits indicates measurable savings of approximately \$143 per year for non-participants related to a reduction in BC Hydro's cost of borrowing as a result of a reduction in delayed revenues.

In response to IRs, BC Hydro also identified other possible savings that could result from the CCF Pilot Program. These included the avoidance of costs associated with final warning calls from collections agents and a reduction in labour costs resulting from avoided disconnections. While BC Hydro did not specifically measure these

benefits in its evaluation, it estimates that, in total, additional non-participant savings from the CCF Pilot Program could be as high as \$187,753 annually.<sup>53</sup>

BC Hydro estimates that the total of the measured<sup>54</sup> and the potential unmeasured benefits<sup>55</sup> of the CCF Pilot for non-participants is a maximum of approximately \$190,000 per year.

The gap between the average ongoing costs of the CCF Pilot of \$1.63 million per year and the estimated, annual savings for non-participants of up to a maximum of \$190,000 is very significant and indicates that there is not an economic justification for the CCF Pilot Program. Given the significant difference between costs and benefits, the Panel considers that any further analysis either now or in the future is unlikely to produce a different outcome that would justify the CCF Pilot Program on an economic or cost of service basis. In addition, there was no evidence to suggest that the overwhelming difference in the cost versus the benefits could be reduced with program improvements or a further analysis of the benefits, even taking into account possible other savings identified by BC Hydro. **For the foregoing reasons, the Panel finds that there is not an economic or cost of service justification for continuing the CCF Pilot Program or making it permanent.**

## 2.2 Other Matters Related to the CCF Pilot Program

This section of the decision addresses other matters raised by the parties as justification for the CCF Pilot Program, including:

- Precedent value of other BCUC decisions;
- Customer experience and feedback; and
- Contextual implications of the COVID-19 pandemic.

### 2.2.1 Precedent Value of Other BCUC Decisions

BCOAPO cites several other BCUC decisions regarding public utility programs and rates it considers relevant to the economic or cost of service justification for the CCF Pilot Program. BCOAPO argues that the other BCUC decisions are precedent for the BCUC approving “non-rate programs” similar to the CCF Pilot Program where there was “no requirement to design the program based on a cost of service or economic justification for ratepayers.”<sup>56</sup>

In particular, BCOAPO refers to the BC Hydro COVID-19 Residential Relief for Renters Application (Residential Renters Application), and highlights the following submission made by BC Hydro in that proceeding:<sup>57</sup>

As BC Hydro’s Renters Relief Program is not a rate, there is no requirement to design the program based on a cost of service or economic justification for ratepayers. As such, BC Hydro has not examined whether such a justification may exist. BC Hydro’s application is in response to policy direction from Government which is to support residential electricity consumers who have lost their jobs or become unable to work because of COVID.<sup>58</sup>

BC Hydro submits that the Residential Renters Application was made “in furtherance of the application made by BC Hydro to amend its Electric Tariff to enable BC Hydro to provide COVID 19 relief to residential ratepayers following the issuance of Order in Council No. 159/2020 (OIC 159).” BC Hydro also states that BCOAPO’s

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<sup>53</sup> Exhibit B-8, BCUC IR 1.4.3.1.

<sup>54</sup> \$143 per year.

<sup>55</sup> \$187,753 per year maximum.

<sup>56</sup> BCOAPO Final Argument, pp. 7–8.

<sup>57</sup> The BCUC approved the BC Hydro COVID-19 Residential Relief for Renters Application by Order G-139-20, dated June 5, 2020.

<sup>58</sup> BC Hydro COVID-19 Residential Rate Relief for Renters Application, Exhibit B-2, BCUC IR 1.1.5.

arguments concerning the BCUC's conclusions in that proceeding are speculative, as the BCUC did not address the specific issues raised by BCOAPO in the BCUC decision regarding the Residential Renters Application.<sup>59</sup>

BCOAPO also argues that there is precedent for the BCUC approving certain rates and programs despite a lack of a short-term cost of service justification and submits the BCUC could similarly approve continuation of the CCF Pilot Program.<sup>60</sup> Specifically, BCOAPO cites the BCUC decisions regarding the BC Hydro Fleet Electrification Rate and the FortisBC Energy (FEI) System Extension Fund Program.<sup>61</sup>

With respect to the BC Hydro Fleet Electrification Rate, BC Hydro submits in reply that the BCUC determined those rates would be justified on an economic or cost of service basis over a period of 10 years. By contrast, BC Hydro does not expect the CCF will be justified on this basis under any time period.<sup>62</sup> BC Hydro did not file any reply argument with respect to the FEI System Extension Fund Program.

### *Panel Determination*

The circumstances of the Residential Renters Application are distinguishable from the circumstances in this decision regarding approval of the CCF Pilot Program, given that the CCF Pilot Program was approved as a pilot in the 2015 RDA Decision to allow time to specifically determine whether it could be justified on an economic or cost of service basis. Conversely, the BCUC decision regarding the BC Hydro Residential Renters Application did not address whether there was an economic or cost of service justification for the tariff amendments proposed by BC Hydro in that application. **Accordingly, the Panel finds the BCUC decision regarding the BC Hydro Residential Renters Application is distinguishable from the circumstances of this proceeding and gives it little weight as a precedent.**

With respect to BCOAPO's reference to certain rates and programs approved by the BCUC despite a lack of a short-term cost of service justification, the Panel notes the circumstances are also distinguishable as those rates and programs were to be justified on an economic or cost of service basis over a period of 10 years. By contrast, the evidence in this proceeding is there is no economic or cost of service justification for the CCF Pilot over any timeframe. **Accordingly, the Panel finds the other rates and programs approved by the BCUC despite a lack of short-term cost of service justification are distinguishable from the circumstances of this proceeding and gives them no weight as a precedent.**

### **2.2.2 Customer Experience and Feedback**

Customer experience and feedback regarding the CCF Pilot Program were raised in the following ways during this proceeding:

- Letters of comment;
- Unsolicited Feedback;
- Results of Participant Survey;
- Results of Non-Participant Surveys;
- CCF Pilot Application Process; and
- Long-term Outcomes for Participants.

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<sup>59</sup> BC Hydro Reply Argument, p. 5.

<sup>60</sup> BCOAPO Final Argument, pp. 8–10, 29–32.

<sup>61</sup> Ibid., p. 29.

<sup>62</sup> BC Hydro Reply Argument, p. 6.

### Letters of Comment

As part of the public process for the current proceeding, the BCUC received 130 letters of comment from members of the public and 17 letters of comment from interested parties in this proceeding. The majority of the letters of comment opposed the CCF Pilot Program, for reasons that included describing the CCF Rate Rider to be like a tax or a forced charitable donation.

### Unsolicited Feedback

The Year One Evaluation Report contains a summary of unsolicited feedback on the CCF Pilot Program, including both compliments and complaints. BC Hydro received 1,472 complaints regarding the CCF Pilot Program during the first year of operations (May 2018 to April 2019), with a significant increase in complaints in both June and September of 2018. BC Hydro states that the increase in these months was coincident with media coverage of the CCF Pilot. The two most common reasons for complaints were customers stating (1) they were not adequately consulted about the CCF Pilot Program and (2) the CCF Pilot Program is a forced charity.<sup>63</sup> BC Hydro reported an additional 140 complaints in Year two of the CCF Pilot and 57 complaints in Year three to-date (May to October 2020).<sup>64</sup>

### Participant Survey

BC Hydro conducted a survey in 2019 of residential customers that applied for the CCF grant, the results of which are included in the Year One Evaluation Report. BC Hydro submits that the results indicate that customers receiving grants were supportive of the program, with 86 percent of participants assessing the overall experience as favourable. Further, 89 percent of participants indicated that without the CCF grant they would have lost electricity service.<sup>65</sup>

### Non-Participant Surveys

The Year One Evaluation Report also contains the results of a non-participant survey conducted between March 30 and April 10, 2019. The survey pertains to BC Hydro's residential customers and was conducted to assess whether broad customer opinion was similar to the 1,472 complaints received by BC Hydro regarding the CCF Pilot Program in its first year of operation.<sup>66</sup> The results indicate that 71 percent of non-participating customers support the CCF Pilot after being informed of the details. BC Hydro submits that these results suggest "...that the opinions expressed by the customers who complained about the CCF Pilot are not shared by customers broadly."<sup>67</sup>

BC Hydro did not complete another participant survey as part of the Two-Year Evaluation Report. Instead, BC Hydro contracted an omnibus survey in May 2020, which polled 1,000 British Columbians to measure awareness of the CCF Pilot Program and support for the CCF Rate Rider. The results show that 88 percent of those polled support a continued offering of a program such as the CCF Pilot and 67 percent support BC Hydro charging a small fee to continue such a program.<sup>68</sup>

### CCF Pilot Application Process

The CCF Evaluation Reports include information related to the application process for CCF Pilot participants. For context, BC Hydro received 20,136 CCF applications in the first two years of the CCF Pilot. Of these, 6,385 applications were approved and 9,892 were rejected. The primary reasons for rejection being that the account

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<sup>63</sup> Exhibit B-1, p. 53.

<sup>64</sup> Exhibit B-8, BCUC IR 1.2.6.

<sup>65</sup> Exhibit B-1, p. 2.

<sup>66</sup> Ibid., p. 51.

<sup>67</sup> Ibid., p. 85.

<sup>68</sup> Exhibit B-5, p. 3.

was not in arrears or not facing disconnection, the applicant was not facing a temporary financial crisis, and the applicant did not provide the requested information.<sup>69</sup> In addition, BC Hydro conducted random audits of grant recipients to confirm program eligibility and reports that approximately one third of successful CCF grant applications were reversed following random audits during the first two years, with the main reason being failure to provide documentation.<sup>70</sup>

### Long-Term Outcomes for Participants

The CCF Evaluation Reports include information regarding the long-term impact of the CCF Pilot Program on participants. Specifically, BC Hydro's evaluation provided in the Two-Year Evaluation Report indicates that the number of disconnections experienced by Test Group customers decreased substantially in the month immediately following receipt of a CCF grant. However, this decrease was not sustained and BC Hydro reports that disconnection rates returned to approximately pre-grant levels after two months.<sup>71</sup> A similar trend was observed in the average number of FNOD letters issued per month. BC Hydro's analysis indicates that there was a decrease in the number of FNOD letters issued to Test Group customers compared to Matched Control Group customers in the month after the CCF grant, but that approximately the same number of FNOD letters were issued to the two groups after three, or four months had passed.<sup>72</sup> Finally, BC Hydro noted that, on average, CCF Pilot Program participants had amounts owing to BC Hydro in every month of the evaluation period and that nearly twice as many grant recipient accounts were closed and expensed as bad debt compared to Matched Control Group customers (59 versus 30).<sup>73</sup>

### *Position of the Parties*

BCOAPO states avoiding disconnections that would have occurred due to temporary financial crisis is the key issue the CCF Pilot Program is intended to resolve and that the results show that the CCF grant supported participants through a financial crisis. In BCOAPO's view, little to no weight should be given to the evaluation of disconnection rates between the Test Group and the Matched Control Group, as put forward in the Two-Year Evaluation Report. BCOAPO submits the Panel should instead attach significant weight to the survey results presented in the Year One Evaluation Report; specifically, that 89 percent of participants surveyed agreed that their electrical service would have been disconnected in the absence of the CCF. On this basis, BCOAPO submits that it would be reasonable to assume that 89 percent or more of CCF grant recipients avoided disconnection and that additional non-participant benefits from a reduction in disconnections and borrowing costs should be recognized.<sup>74</sup>

In Reply, BC Hydro concludes that while grants issued under the CCF Pilot Program may have helped recipients in the short term, there was not an ongoing benefit to non-participants, as the financial issues faced by program participants appear to have arisen again in the months following the grant.<sup>75</sup>

### *Panel Discussion*

The Panel addresses customer experience and feedback regarding the CCF Pilot in its overall conclusions regarding the CCF Pilot in section 3.0 of this Decision.

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<sup>69</sup> Exhibit B-5, pp. 13, 18.

<sup>70</sup> Ibid., p. 27.

<sup>71</sup> Applying the differences in differences methodology, BC Hydro identified a statistically insignificant increase in the average rate of disconnections for the Test Group in the three and four months after receipt of a CCF grant compared to the Matched Control Group. Exhibit B-5, pp. 43–44; Exhibit B-8, BCUC IR 1.13.1.

<sup>72</sup> Exhibit B-5, p. 45.

<sup>73</sup> Ibid.; Exhibit B-8, BCUC IR 1.10.1.

<sup>74</sup> BCOAPO Final Argument, pp. 15–16

<sup>75</sup> BC Hydro Reply Argument, p. 8.

### 2.2.3 Contextual Implications of the COVID-19 Pandemic

The Two-Year Evaluation Report covers various aspects of the CCF Pilot Program between May 1, 2018 and April 30, 2020, which includes the onset of the COVID-19 pandemic in BC. The CCF Pilot was temporarily amended due to the COVID-19 pandemic to allow customers to apply as soon as they had an account in arrears without waiting for a FNOD and to receive a second CCF grant between April 1, 2020 and December 31, 2020 if the initial grant was less than the maximum amount.<sup>76</sup>

BC Hydro submits that the impacts of the COVID-19 pandemic are reflected in the Two-Year Evaluation Report in several ways. First, the operational summary of the CCF Pilot covers the period between May 1, 2018 and April 30, 2020 and shows a significant increase in the number of CCF grant applications in March and April 2020. Second, the evaluation of non-participant benefits was completed over a period of 22 months between May 1, 2018 and February 28, 2020, rather than 24 months due to the suspension of BC Hydro dunning activities at the onset of the COVID-19 pandemic. Third, the responses to the public opinion survey administered in May 2020 may be influenced by the COVID-19 pandemic; however, BC Hydro submits that any such impact is unknown.<sup>77</sup>

#### *Position of the Parties*

BCOAPO states that BC Hydro's evaluation of non-participant benefits over a period of 22 months excludes the effects of COVID-19, even though the pandemic has had "significant impacts." This includes a considerable increase in the number of customers accessing the program, which BCOAPO contends is a trend that is not reversing. BCOAPO also submits that the program is consistent with the priorities of the BC provincial government, based on the Honourable Minister Mungall's Mandate Letter dated February 21, 2020, which directed BC Hydro to "make life more affordable," amongst other things.<sup>78</sup> BC Hydro does not specifically address the arguments put forward by BCOAPO on this topic in its reply.

#### *Panel Discussion*

The Panel addresses the contextual implications of the COVID-19 pandemic in its overall conclusions regarding the CCF Pilot in section 3.0 of this decision.

### 3.0 Conclusions on CCF Pilot Program

BC Hydro acknowledges that there are societal benefits for CCF grant recipients. However, BC Hydro concludes that since the benefits to non-participant ratepayers are substantially outweighed by the costs of the CCF Pilot Program, there is no economic or cost of service justification for making the CCF Pilot Program permanent and the CCF Pilot Program should be allowed to terminate on May 31, 2021. BC Hydro further submits "there are no other measures that cause the CCF Pilot Program to demonstrate utility or ratepayer benefits."<sup>79</sup>

#### *Position of the Parties*

BCSEA and Zone II RPG support the CCF Pilot Program and the CEC recognizes the benefits to participants. However, BCSEA, Zone II RPG and the CEC agree with BC Hydro that the program should terminate on May 31, 2021 due to the lack of economic or cost of service justification.

BCOAPO does not accept that the information currently on the record is complete or that it provides a sufficient basis for termination of the CCF Pilot Program. Specifically, BCOAPO submits that a Panel determination of

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<sup>76</sup> Exhibit B-5, p. 11.

<sup>77</sup> Ibid.

<sup>78</sup> BCOAPO Final Argument, pp. 33–27.

<sup>79</sup> BC Hydro Final Argument, p. 3.

whether the CCF Pilot should continue on a permanent basis is outside the scope of the current proceeding as set out in Order G-266-20 and that further process is required.<sup>80</sup> BCOAPO also recommends that the BCUC approve the CCF Pilot Program on a permanent basis or, in the alternative, that the BCUC order BC Hydro to address deficiencies in its Two-Year Evaluation Report.<sup>81</sup>

In Reply, BC Hydro submits that further process is not warranted to determine whether the CCF Pilot should continue on a permanent basis as follows:

In BC Hydro's view, the Evaluation Reports and BC Hydro's responses to both the BCUC and intervener IRs demonstrate that the marginal benefits to non-participant ratepayers of the CCF Pilot are far outweighed by the costs of the CCF Pilot and therefore there is no economic or cost of service justification for continuing the CCF Pilot on a permanent basis.<sup>82</sup>

In conclusion, BC Hydro acknowledges the value of the CCF Pilot to those that have received the grant but reiterates that the analysis of the non-participant benefits in the Two-Year Evaluation Report does not support the conclusion that there is an economic or cost of service justification to make the program permanent.<sup>83</sup>

### *Panel Determination*

In making its determinations on the CCF Pilot Program, the Panel has considered the economic or cost of service considerations addressed in section 2.1 above and the other matters raised in section 2.2 above, including customer experience and feedback and the contextual implications of the COVID-19 pandemic.

The Panel acknowledges that most of the letters of comment filed in the proceeding oppose the CCF Pilot and a significant number of complaints were filed in relation to the CCF Pilot, primarily in the first year. However, the non-participant surveys referred to in the Evaluation Reports indicate broad support for such a program. Thus, despite the significant number of complaints made regarding the CCF Pilot, there appears to be general support for such a program by ratepayers and the public.

The Panel recognizes the positive impact of the CCF Pilot Program for grant recipients; particularly for those customers that were able to maintain electricity service after receiving the CCF grant. The results from the participant survey presented in the Year One Evaluation Report indicate that the experience with the CCF Pilot was positive for the majority of applicants, with 86 percent reporting a favourable experience overall and 89 percent of participants stating that without the CCF grant they would have lost electricity service.<sup>84</sup> The Panel also notes that the onset of the COVID-19 pandemic increased the need for the CCF, as demonstrated by the increase in the number of applications in March and April 2020. However, the Panel notes that generally the benefits for participants do not have a long-term impact. BC Hydro's assessment provided in the Two-Year Evaluation Report shows an increasing trend in the number of FNODs issued, disconnections and accounts closed and expensed as bad debts several months after receipt of the CCF grant.

Accordingly, it appears that the CCF Pilot as presently designed has not had the desired impact, given that the financial issues experienced by CCF Pilot participants appear to have occurred again several months after receiving the CCF grant. Therefore, in spite of what appears to be positive feedback, there is no evidence to suggest that continuing with the CCF Pilot Program as designed will create a desirable impact over the longer term. Further, there is insufficient evidence with regard to other approaches that might successfully be applied to create a more favourable outcome in the future.

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<sup>80</sup> BCOAPO Final Argument, p. 14.

<sup>81</sup> BCOAPO Final Argument, pp. 1–2.

<sup>82</sup> BC Hydro Reply Argument, p. 9.

<sup>83</sup> Ibid.

<sup>84</sup> Exhibit B-1, p. 2.

For the foregoing reasons, the Panel finds that there is insufficient evidence that there are any other approaches or matters that justify the continuation of the CCF Pilot Program.

As a result of the Panel's determinations that continuation of the CCF Pilot Program cannot be justified on an economic or cost of service basis or as a result of other matters raised in in this proceeding, the CCF Pilot will terminate effective May 31, 2021, pursuant to Order G-166-17. BC Hydro is further directed to file amendments to its Electric Tariff to reflect the termination of the CCF Pilot effective May 31, 2021 within 10 days of this decision.

#### 4.0 OIC 159 and CCF Rate Rider

Rate Schedule 1903, which contains the CCF Rate Rider, was approved by the BCUC effective June 1, 2018.<sup>85</sup> On July 31, 2019, BC Hydro filed an application with the BCUC in a separate proceeding to amend the CCF Rate Rider effective October 1, 2019 from 0.82 cents per day to 0.43 cents per day. The BCUC approved the amendment to the CCF Rate Rider on an interim and refundable/recoverable basis and adjourned that proceeding pending the outcome of the current proceeding to review the CCF Evaluation Reports.<sup>86</sup>

On April 2, 2020, the Lieutenant Governor in Council (LGIC) issued OIC 159 respecting COVID-19 relief, which states, among other things, that the BCUC must allow BC Hydro to defer amounts for the residential customer COVID-19 Relief Program to the CCF Regulatory Account. In addition, OIC 159 provides that the BCUC "may not exercise its powers under the Act to amend, cancel or suspend the customer crisis fund rate rider, except on application by [BC Hydro]."<sup>87</sup>

BCOAPo states that it is not clear that the CCF Rate Rider will terminate automatically when the CCF Pilot ends.<sup>88</sup> BC Hydro submits that the CCF Rate Rider and the related tariff provisions will terminate on May 31, 2021 pursuant to Order G-166-17 without further action being required, but the CCF Regulatory Account will continue beyond this date in accordance with OIC 159. Further, BC Hydro states that it will file amendments to its Electric Tariff after May 31, 2021 to address the end of the CCF Pilot.<sup>89</sup>

#### *Panel Determination*

OIC 159 provides, in part, that the BCUC "may not exercise its powers under the Act to amend, cancel or suspend the customer crisis fund rate rider, except on application by [BC Hydro]."<sup>90</sup> The Panel interprets OIC 159 to supersede previous BCUC orders related to the CCF Rate Rider, including Order G-166-17, and to place a limitation on the BCUC's jurisdiction to make future orders. Specifically, the BCUC can only exercise its jurisdiction under the UCA to amend, cancel or suspend the CCF Rate Rider upon application by BC Hydro.

**As a result of the provisions of OIC 159, the Panel finds that the CCF Rate Rider will not automatically terminate effective May 31, 2021 pursuant to Order G-166-17 and that the BCUC does not have the jurisdiction to amend, cancel or suspend the CCF Rate Rider, except on application by BC Hydro.** Accordingly, the CCF Rate Rider remains in effect on an interim basis and the BCUC proceeding related to the CCF Rate Rider proceeding remains adjourned. As noted by BC Hydro in its Final Argument, the CCF Regulatory Account will continue beyond May 31, 2021 in accordance with OIC 159.

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<sup>85</sup> Order G-166-17.

<sup>86</sup> Order G-194-19.

<sup>87</sup> [https://www.bclaws.gov.bc.ca/civix/document/id/oic/oic\\_cur/0159\\_2020](https://www.bclaws.gov.bc.ca/civix/document/id/oic/oic_cur/0159_2020)

<sup>88</sup> Exhibit C5-4.

<sup>89</sup> BC Hydro Final Argument, p. 5.

<sup>90</sup> [https://www.bclaws.gov.bc.ca/civix/document/id/oic/oic\\_cur/0159\\_2020](https://www.bclaws.gov.bc.ca/civix/document/id/oic/oic_cur/0159_2020)

BC Hydro submits that it will file with the BCUC amendments to its Electric Tariff to reflect the termination of the CCF Pilot Program, including the termination of the CCF Rate Rider.<sup>91</sup> In light of OIC 159 and the foregoing finding and reasons, in the event BC Hydro files with the BCUC any amendments to its Electric Tariff that seek to include termination of the CCF rate rider, such tariff amendments must be accompanied by a corresponding application seeking termination for the CCF Rate Rider.

## 5.0 Additional Comments on CCF Pilot Program

The BCUC decision in the matter of the BC Hydro 2015 RDA considered several low-income proposals put forward by BCOAPO and reviewed the BCUC's jurisdiction to approve low-income rates. In that decision, the BCUC made the following finding:

... low income rates unsupported by an economic or cost of service justification are unjust, unreasonable and unduly discriminatory and are therefore not in accordance with section 59 of the UCA. The Panel finds no evidence of legislative intent to provide the Commission with jurisdiction to set low income rates and there is no evidence the legislature intended the UCA to provide jurisdiction for low-income rates in the absence of an economic or cost of service justification.<sup>92</sup>

For the reasons noted above, the Panel has found that the CCF Pilot Program cannot be justified on an economic or cost basis or as a result of other matters raised in this proceeding. Also, as presently designed, the CCF Pilot Program has not had the desired impact, given that the financial issues experienced by CCF Pilot participants appear to have occurred again several months after receipt of the CCF grant.

However, BC Hydro acknowledges that there are societal benefits for CCF grant recipients and its survey results indicate broad public support for such a program. In addition, BCOAPO, BCSEA and Zone II RPG also express support for the CCF Pilot and the CEC recognizes the benefits to participants.

Nevertheless, BC Hydro, BCSEA, Zone II RPG and the CEC all agree that the CCF Pilot Program should terminate due to the lack of economic or cost of service justification.

The role of the provincial government in relation to the CCF Pilot Program and similar programs was also addressed by the interveners. BCSEA submits that the provincial government should authorize a low-income rate<sup>93</sup> and the CEC states that customer options for ensuring continued energy supply should be managed by the provincial government.<sup>94</sup> In addition, Zone II RPG states that the CCF Pilot Program is consistent with the Province's mandate letter to BC Hydro.<sup>95</sup>

Given the limitations on the BCUC's jurisdiction to set low income rates as discussed in the 2015 RDA Decision, the Panel is of the view that programs offering support to residential customers that are experiencing a temporary financial crisis and are facing disconnection of their BC Hydro service may be more effectively addressed as a matter of public policy by the provincial government.

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<sup>91</sup> BC Hydro Final Argument, p. 5.

<sup>92</sup> BC Hydro 2015 RDA Decision, p. iv.

<sup>93</sup> BCSEA Final Argument, p. 3.

<sup>94</sup> CEC Final Argument, p. 5.

<sup>95</sup> Exhibit B-9, Zone II RPG IR 1.8.3.

**DATED** at the City of Vancouver, in the Province of British Columbia, this    7<sup>th</sup>    day of May 2021.

*Original signed by:*

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W. M. Everett, QC  
Panel Chair / Commissioner

*Original signed by:*

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D. A. Cote  
Commissioner

*Original signed by:*

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K. A. Kelty  
Commissioner



**bcuc**  
British Columbia  
Utilities Commission

Suite 410, 900 Howe Street  
Vancouver, BC Canada V6Z 2N3  
**bcuc.com**

P: 604.660.4700  
TF: 1.800.663.1385  
F: 604.660.1102

**ORDER NUMBER  
G-144-21**

IN THE MATTER OF  
the *Utilities Commission Act*, RSBC 1996, Chapter 473

and

British Columbia Hydro and Power Authority  
Customer Crisis Fund Evaluation Reports

**BEFORE:**

W. M. Everett, QC, Panel Chair  
D. A. Cote, Commissioner  
K. A. Keilty, Commissioner

On May 7, 2021

**ORDER**

**WHEREAS:**

- A. Following the public hearing of British Columbia Hydro and Power Authority's (BC Hydro) 2015 Rate Design Application (2015 RDA), the British Columbia Utilities Commission (BCUC) issued its Decision and accompanying Order G-5-17 dated January 1, 2017. In the 2015 RDA Decision, the BCUC approved the establishment of a pilot crisis intervention fund and directed BC Hydro to file a proposal for a pilot program within six months;
- B. By Order G-166-17 dated November 17, 2017, the BCUC approved the Customer Emergency Fund, later renamed the Customer Crisis Fund (CCF), Pilot Program Application, including the CCF Rate Rider and the CCF Regulatory Account (CCF Pilot Program), and directed BC Hydro to file an evaluation report within 90 days of completion of the second year of the CCF Pilot Program. The CCF Pilot Program was approved until the earlier of:
  - a) three years from the implementation date of June 1, 2018;
  - b) BCUC approval of an application from BC Hydro to end the CCF Pilot Program prior to the end of the three years; or
  - c) issuance of a BCUC order to end the CCF Pilot Program;
- C. Upon receiving a significant number of complaints regarding the CCF Pilot Program, the BCUC issued Order G-211-18 dated November 8, 2018, and directed BC Hydro to file an evaluation report within 90 days of the completion of the first year of the CCF Pilot Program;
- D. On July 31, 2019, BC Hydro commenced this proceeding (CCF Evaluation Report Proceeding) by filing its Year One Evaluation Report for the CCF Pilot Program (CCF Year One Evaluation Report) with the BCUC. At the time of filing its CCF Year One Evaluation Report, BC Hydro submitted that with only one year of operations it

was unable to conclusively identify whether the CCF Pilot Program could be justified on an economic or cost of service basis;

- E. By Order G-195-19 dated April 30, 2019, the BCUC established a regulatory timetable which included public notice, intervener registration and submissions from BC Hydro and interveners regarding the timing and scope of the BCUC review of the CCF Pilot Program;
- F. BC Sustainable Energy Association (BCSEA); FortisBC Energy Inc. and FortisBC Inc. (collectively FortisBC); Mr. Anthony Lo; Non-Integrated Areas Ratepayers Group (NIARG); BC Old Age Pensioners' Organization, Active Support Against Poverty, Council of Senior Citizens' Organizations of BC, Disability Alliance BC, and Together Against Poverty Society (BCOAPO); Zone II Ratepayers Group (Zone II RPG); and the Commercial Energy Consumers Association of British Columbia (CEC) registered as interveners in the CCF Evaluation Report Proceeding;
- G. By Order G-5-20 dated January 10, 2020, the BCUC adjourned the CCF Evaluation Report Proceeding pending the filing of the Two-Year Evaluation Report for CCF Pilot Program (Two-Year Evaluation Report);
- H. On April 2, 2020, Lieutenant Governor in Council (LGIC) issued Order in Council (OIC) 159 which includes the following section 5:

The commission may not exercise its powers under the Act [Utilities Commission Act] to amend, cancel or suspend the customer crisis fund rate rider, except on application by the authority [BC Hydro];
- I. On July 31, 2020, BC Hydro filed its Two-Year Evaluation Report with the BCUC. The Year One and Two-Year Evaluation Reports are collectively referred to as the Evaluation Reports;
- J. By Orders G-224-20, G-266-20 and G-339-20, the BCUC established and amended regulatory timetables for the review of the Evaluation Reports, including BCUC and interveners information requests, an opportunity for interveners to provide notice of intent to file evidence, and written final argument. Order G-266-20 limited the scope of the review to the Evaluation Reports to:

whether there is an economic or cost of service justification for the CCF Pilot Program, and any other approaches or matters that should be considered in measuring and assessing utility and ratepayer benefits and costs associated with the CCF Pilot Program; and
- K. The Panel has reviewed the Evaluation Reports, evidence and submissions filed in the proceeding and determines that the following orders are warranted.

**NOW THEREFORE** for the reasons stated in the Decision issued concurrently with this order, the BCUC orders as follows:

1. The CCF Pilot Program will terminate effective May 31, 2021, pursuant to Order G-166-17.
2. BC Hydro is to file amendments to its Electric Tariff to reflect the termination of the CCF Pilot Program effective May 31, 2021, within 10 days of this order.

**DATED** at the City of Vancouver, in the Province of British Columbia, this 7<sup>th</sup> day of May 2021.

BY ORDER

*Original signed by:*

W. M. Everett, QC  
Commissioner

British Columbia Hydro and Power Authority  
Customer Crisis Fund Evaluation Reports

LIST OF ACRONYMS

|                                |  |
|--------------------------------|--|
| 2015 RDA                       | British Columbia Hydro and Power Authority 2015 Rate Design Application  |
| BC Hydro                       | British Columbia Hydro and Power Authority   |
| BCOAPO                         | BC Old Age Pensioners' Organization, Active Support Against Poverty, Council of Senior Citizens' Organizations of BC, Disability Alliance BC, and Together Against Poverty Society |
| BCSEA                          | BC Sustainable Energy Association  |
| BCUC                           | British Columbia Utilities Commission  |
| CCF                            | Customer Crisis Fund   |
| CCF Pilot or CCF Pilot Program | British Columbia Hydro and Power Authority Customer Crisis Fund Pilot Program  |
| CEC                            | Commercial Energy Consumers Association of British Columbia  |
| DID                            | Difference in Difference   |
| Evaluation Reports             | Customer Crisis Fund Year One and the Two-Year Evaluation Reports  |
| FNOD                           | Final Notice of Disconnection  |
| FEI                            | FortisBC Energy Inc.   |
| FortisBC                       | FortisBC Energy Inc. and FortisBC Inc.   |
| IR                             | Information Request  |
| LGIC                           | Lieutenant Governor in Council   |
| Matched Control Group          | British Columbia Hydro and Power Authority Customers That Did Not Receive Customer Crisis Fund Grants  |
| NIARG                          | Non-Integrated Areas Ratepayers Group  |
| OIC                            | Order in Council   |
| RCT                            | Randomized Control Trial   |

|                                 |  |
|---------------------------------|--|
| Residential Renters Application | British Columbia Hydro and Power Authority COVID-19 Residential Relief for Renters Application |
| Test Group                      | Customer Crisis Fund Grant Recipients in British Columbia Hydro and Power Authority's study    |
| Zone II RPG                     | Zone II Ratepayers Group   |
| UCA                             | <i>Utilities Commission Act</i>  |

IN THE MATTER OF  
the *Utilities Commission Act*, RSBC 1996, Chapter 473

and

British Columbia Hydro and Power Authority  
Customer Crisis Fund Pilot Program – Evaluation Report

**EXHIBIT LIST**

| Exhibit No.                 | Description  |
|-----------------------------|--|
| <i>COMMISSION DOCUMENTS</i> |  |
| A-1                         | Letter dated August 16, 2019 - Appointing the Panel for the review of British Columbia Hydro and Power Authority Customer Crisis Fund Pilot Program – Year One Evaluation Report |
| A-2                         | Letter dated August 22, 2019 – BCUC Order G-195-19 establishing a regulatory timetable and public notice   |
| A-3                         | Letter dated January 10, 2020 – BCUC Order G-5-20 adjourning the proceeding  |
| A-4                         | Letter dated August 28, 2020 – BCUC Order G-224-20 reopening the proceeding and establishing a regulatory timetable  |
| A-5                         | Letter dated October 23, 2020 – BCUC Order G-266-20 with Reasons for Decision establishing a further regulatory timetable  |
| A-6                         | Letter dated November 13, 2020 – BCUC Information Request No. 1 to BC Hydro  |
| A-7                         | Letter dated December 18, 2020 – BCUC Order G-339-20 establishing a further regulatory timetable   |

**APPLICANT DOCUMENTS**

- B-1        **BRITISH COLUMBIA HYDRO AND POWER AUTHORITY (BC HYDRO)** – Letter dated July 31, 2019 - Submitting the Customer Crisis Fund Pilot Program – Year One Evaluation Report
  
- B-1-1      Letter dated July 31, 2019 – BC Hydro Submitting Appendix E to the Customer Crisis Fund Pilot Program – Year One Evaluation Report
  
- B-2        Letter dated September 10, 2019 – BC Hydro Submitting compliance with Order G-195-19
  
- B-3        Letter dated November 28, 2019 – BC Hydro Submission on timing, regulatory process and scope
  
- B-4        Letter dated December 12, 2019 – BC Hydro Reply Submission on timing, regulatory process and scope
  
- B-5        Letter dated July 28, 2020 - BC Hydro Submitting Customer Crisis Fund Pilot Program Two-Year Evaluation Report
  
- B-5-1      Letter dated December 4, 2020 - BC Hydro Submitting Errata to Customer Crisis Fund Pilot Program Two-Year Evaluation Report in compliance with Directive 6 of Order G-166-17
  
- B-6        Letter dated September 4, 2020 – BC Hydro Submitting compliance with Order G-224-20
  
- B-7        Letter dated September 21, 2020 – BC Hydro reply submission on items outlined in Appendix B of Order G-224-20
  
- B-8        Letter dated December 4, 2020 – BC Hydro Submitting response to BCUC Information Request No. 1
  
- B-9        Letter dated December 4, 2020 – BC Hydro Submitting responses to Intervener Information Requests No. 1

*INTERVENER DOCUMENT*

- C1-1 **BC SUSTAINABLE ENERGY ASSOCIATION (BCSEA)** – Letter dated September 10, 2019 Request for Intervener Status by Timothy Hackney and William J. Andrews
- C1-2 Letter dated November 28, 2019 – BCSEA submission on timing, regulatory process and scope
- C1-3 Letter dated September 14, 2020 – BCSEA submission on items outlined in Appendix B of Order G-224-20
- C1-4 Letter dated November 12, 2020 – BCSEA submitting IR No. 1 to BC Hydro
- C2-1 **FORTISBC ENERGY INC. AND FORTISBC INC. (FORTISBC)** - Letter dated October 10, 2019 Request to Intervene by Doug Slater
- C2-2 Letter dated November 28, 2019 – FortisBC submission on timing, regulatory process and scope
- C2-3 Letter dated September 14, 2020 – FortisBC submission on items outlined in Appendix B of Order G-224-20
- C3-1 **LO, ANTHONY (Lo)** - Letter dated November 12, 2019 Request to Intervene
- C3-2 Letter dated November 30, 2019 – Lo Late Submission on timing, regulatory process and scope
- C3-3 Letter dated December 12, 2019 – Lo Reply Submission regarding BC Hydro’s reply submission
- C3-4 Letter dated November 13, 2020 – Lo Submitting Information Request No. 1 to BC Hydro
- C4-1 **NON-INTEGRATED AREAS RATEPAYERS GROUP (NIARG)** - Letter dated November 18, 2019 Request to Intervene by Fred Weisberg
- C4-2 Letter dated November 28, 2019 – NIARG submission on timing, regulatory process and scope
- C5-1 **BC OLD AGE PENSIONERS’ ORGANIZATION, ACTIVE SUPPORT AGAINST POVERTY, COUNCIL OF SENIOR CITIZENS’ ORGANIZATIONS OF BC, DISABILITY ALLIANCE BC, AND TOGETHER AGAINST POVERTY SOCIETY (BCOAPO ET AL.)** - Letter dated November 18, 2019 Request to Intervene by Leigha Worth and Irna Mis
- C5-2 Letter dated November 28, 2019 – BCOAPO submission on timing, regulatory process and scope
- C5-3 Letter dated December 12, 2019 – BCOAPO Reply Submission on timing, regulatory process and scope

- C5-4 Letter dated September 14, 2020 – BCOAPO submission on items outlined in Appendix B of Order G-224-20
- C5-5 Letter dated November 13, 2020 – BCOAPO submitting Information Request No. 1 to BC Hydro
- C6-1 **KWADACHA NATION AND TSAY KEH DENE NATION (TOGETHER ZONE II RATEPAYERS GROUP) (ZONE II RPG)** - Letter dated November 18, 2019 Request to Intervene by Jana McLean, Iris Legal Law Corporation
- C6-2 Letter dated November 28, 2019 – Zone II RPG submission on timing, regulatory process and scope
- C6-3 Letter dated December 12, 2019 – Zone II RPG Reply Submission on timing, regulatory process and scope
- C6-4 Letter dated September 14, 2020 – Zone II RPG submission on items outlined in Appendix B of Order G-224-20
- C6-5 Letter dated November 13, 2020 – Zone II RPG submitting IR No. 1 to BC Hydro
- C7-1 **COMMERCIAL ENERGY CONSUMERS ASSOCIATION OF BRITISH COLUMBIA (CEC)** - Letter dated November 18, 2019 Request to Intervene by Christopher Weafer, Owen Bird law Corporation
- C7-2 Letter dated November 28, 2019 – CEC submission on timing, regulatory process and scope
- C7-3 Letter dated September 14, 2020 – CEC submission on items outlined in Appendix B of Order G-224-20
- C7-4 Letter dated November 13, 2020 – CEC submitting IR No. 1 to BC Hydro

*INTERESTED PARTY DOCUMENTS*

|        |  |
|--------|--|
| D-1    | <b>KING, KELLY (KING)</b> - Submission dated September 6, 2019 Request for Interested Party Status           |
| D-1-1  | Letter dated September 6, 2019 – King Submitting Comments  |
| D-2    | <b>LODHIA, ROHIT (LODHIA)</b> - Submission dated September 6, 2019 Request for Interested Party Status       |
| D-3    | <b>PREDDY, GAIL (PREDDY)</b> - Submission dated September 7, 2019 Request for Interested Party Status        |
| D-3-1  | Letter dated September 7, 2019 – Preddy Submitting Comments  |
| D-4    | <b>WISSMEYER, G. (WISSMEYER)</b> - Submission dated September 6, 2019 Request for Interested Party Status    |
| D-4-1  | Letter dated September 8, 2019 – Wissmeyer Submitting Comments   |
| D-5    | <b>KIMURA, L. (KIMURA)</b> - Submission dated September 16, 2019 Request for Interested Party Status         |
| D-5-1  | Letter dated September 13, 2019 – Kimura Submitting Comments   |
| D-6    | <b>VON HOLLEN, G. (VON HOLLEN)</b> - Submission dated September 16, 2019 Request for Interested Party Status |
| D-6-1  | Letter dated September 16, 2019 – von Hollen Submitting Comments   |
| D-7    | <b>SEWELL, A. (SEWELL)</b> - Submission dated September 19, 2019 Request for Interested Party Status         |
| D-8    | <b>MCMILLAN, L. (MCMILLAN)</b> - Submission dated September 19, 2019 Request for Interested Party Status     |
| D-9    | <b>DURRANCE, M. (DURRANCE)</b> - Submission dated September 19, 2019 Request for Interested Party Status     |
| D-9-1  | Letter dated September 24, 2019 – Durrance Submitting Comments   |
| D-10   | <b>BRENT</b> - Submission dated September 22, 2019 Request for Interested Party Status                       |
| D-11   | <b>KOVACS, G. (KOVACS)</b> - Submission dated October 6, 2019 Request for Interested Party Status            |
| D-11-1 | Letter dated October 15, 2019 – Kovacs Submitting Comments   |
| D-12   | <b>KARPIAK, E. (KARPIAK)</b> - Submission dated October 14, 2019 Request for Interested Party Status         |

- D-13      **BUCHANAN, JACK (BUCHANAN)**- Submission dated October 15, 2019 Request for Interested Party Status
- D-14      **HERD, D. (HERD)** - Submission dated October 28, 2019 Request for Interested Party Status
- D-15      **FERNANDEZ, R. (FERNANDEZ)** - Submission dated November 4, 2019 Request for Interested Party Status
- D-16      **CAVEN, W. – (CAVEN)** - Submission dated November 8, 2019 Request for Interested Party Status
- D-16-1      Letter dated November 5, 2019 – Caven Submitting Comments
- D-17      **DAUNAI, M. – (DAUNAI)** - Submission dated November 13, 2019 Request for Interested Party Status
- D-17-1      Letter dated November 11, 2019 – Daunai Submitting Comments
- D-18      **TATARYN, B. D. – (TATARYN)** - Submission dated November 13, 2019 Request for Interested Party Status
- D-18-1      Letter dated November 16, 2019 – Tataryn Submitting Comments
- D-18-2      Letter dated November 18, 2019 – Tataryn Submitting Comments
- D-19      **DEMECHA, G. – (DEMECHA)** - Submission dated November 13, 2019 Request for Interested Party Status
- D-20      **BENZLEY, L. – (BENZLEY)** - Submission dated November 13, 2019 Request for Interested Party Status
- D-20-1      Letter dated November 13, 2019 – Benzley Submitting Comments
- D-21      **KIRKMAN, G. – (KIRKMAN)** - Submission dated November 18, 2019 Request for Interested Party Status
- D-21-1      Letter dated November 16, 2019 – Kirkman Submitting Comments
- D-21-2      Letter dated November 20, 2019 – Kirkman Submitting Comments
- D-21-3      Letter dated November 28, 2019 – Kirkman Submitting Comments
- D-21-4      Letter dated December 1, 2019 – Kirkman Submitting Comments
- D-21-5      Letter dated September 5, 2020 – Kirkman Submitting Comments
- D-21-6      Letter dated September 23, 2020 – Kirkman Submitting Comments
- D-22      **ECOTRUST CANADA – (ECOTRUST CANADA)** - Submission dated December 7, 2019 Request for Interested Party Status by Dylan Heerema with Letter of Comment

*LETTERS OF COMMENT*

|      |   |
|------|---|
| E-1  | Fuller, C. – Letter of Comment dated August 30, 2019          |
| E-2  | Ophoff, W. – Letter of Comment dated August 30, 2019          |
| E-3  | McRae, C. – Letter of Comment dated August 30, 2019           |
| E-4  | Brackenreed, E. – Letter of Comment dated September 6, 2019   |
| E-5  | McClare, S. – Letter of Comment dated September 6, 2019       |
| E-6  | Redlin, D. – Letter of Comment dated September 6, 2019        |
| E-7  | Coleman, P. – Letter of Comment dated September 6, 2019       |
| E-8  | Robinson, T. – Letter of Comment dated September 6, 2019      |
| E-9  | Laflamme, S. – Letter of Comment dated September 6, 2019      |
| E-10 | Watson, E. – Letter of Comment dated September 6, 2019        |
| E-11 | Abell, M. – Letter of Comment dated September 6, 2019         |
| E-12 | Cristiano, R. – Letter of Comment dated September 6, 2019     |
| E-13 | Osuna, L. – Letter of Comment dated September 6, 2019         |
| E-14 | Kalib – Letter of Comment dated September 9, 2019             |
| E-15 | REMOVED   |
| E-16 | Lang, B. – Letter of Comment dated September 7, 2019          |
| E-17 | Larke, C. – Letter of Comment dated September 7, 2019         |
| E-18 | Laundry, L. – Letter of Comment dated September 9, 2019       |
| E-19 | Linford-Sakal, M. – Letter of Comment dated September 8, 2019 |
| E-20 | Mcneil, S. – Letter of Comment dated September 6, 2019        |
| E-21 | Removed Now Exhibit D-3-1                                     |
| E-22 | Romain, L. – Letter of Comment dated September 9, 2019        |
| E-23 | Smith, M. – Letter of Comment dated September 7, 2019         |
| E-24 | Spanevello, D. – Letter of Comment dated September 7, 2019    |
| E-25 | Taylor, M. – Letter of Comment dated September 8, 2019        |

|      |  |
|------|--|
| E-26 | Removed Now Exhibit D-4-1                                  |
| E-27 | Sund, M. – Letter of Comment dated September 9, 2019       |
| E-28 | Bomford, B. – Letter of Comment dated September 9, 2019    |
| E-29 | Hepworth, C. – Letter of Comment dated September 9, 2019   |
| E-30 | Angela, A. – Letter of Comment dated September 9, 2019     |
| E-31 | Burns, P. – Letter of Comment dated September 10, 2019     |
| E-32 | Desserre, V. – Letter of Comment dated September 10, 2019  |
| E-33 | Harrison, B. – Letter of Comment dated September 10, 2019  |
| E-34 | Haynes, S. – Letter of Comment dated September 10, 2019    |
| E-35 | Therrien, G. – Letter of Comment dated September 9, 2019   |
| E-36 | Lungle, K. – Letter of Comment dated September 4, 2019     |
| E-37 | Beck, L. – Letter of Comment dated September 10, 2019      |
| E-38 | Mayne, R. – Letter of Comment dated September 10, 2019     |
| E-39 | Copp, K. – Letter of Comment dated September 11, 2019      |
| E-40 | Wilkins, R. – Letter of Comment dated September 11, 2019   |
| E-41 | Hunter, A. – Letter of Comment dated September 12, 2019    |
| E-42 | Johnston, K. – Letter of Comment dated September 11, 2019  |
| E-43 | Nordhoj, C. – Letter of Comment dated September 11, 2019   |
| E-44 | Reynolds, M. – Letter of Comment dated September 11, 2019  |
| E-45 | Kirkman, G. – Letter of Comment dated September 12, 2019   |
| E-46 | Graham, D. – Letter of Comment dated September 13, 2019    |
| E-47 | Dowsett, C. – Letter of Comment dated September 13, 2019   |
| E-48 | Fournier, D. – Letter of Comment dated September 14, 2019  |
| E-49 | McLintock, J. – Letter of Comment dated September 15, 2019 |
| E-50 | Brost, D. – Letter of Comment dated September 15, 2019     |
| E-51 | Megenbir, M. – Letter of Comment dated September 16, 2019  |

|        |   |
|--------|---|
| E-52   | Malan, P. – Letter of Comment dated September 16, 2019              |
| E-53   | Waterberg, M. – Letter of Comment dated September 16, 2019          |
| E-54   | Pike, T. – Letter of Comment dated September 16, 2019               |
| E-55   | DeKolver, D. – Letter of Comment dated September 16, 2019           |
| E-56   | Pawlik, V. – Letter of Comment dated September 16, 2019             |
| E-57   | Kropinak, L. – Letter of Comment dated September 17, 2019           |
| E-58   | Lutes, N. R. – Letter of Comment dated September 17, 2019           |
| E-59   | Kilbreath, C. – Letter of Comment dated September 17, 2019          |
| E-60   | Vince-Smith, M. and B. – Letter of Comment dated September 10, 2019 |
| E-61   | Gilchrist, J. – Letter of Comment dated September 13, 2019          |
| E-62   | Watrich, J. – Letter of Comment dated September 18, 2019            |
| E-63   | Birch, K. – Letter of Comment dated September 18, 2019              |
| E-64   | Leite, C. – Letter of Comment dated September 19, 2019              |
| E-64-1 | Leite, C. – Revised Letter of Comment dated September 30, 2019      |
| E-65   | Lagadyn, J. – Letter of Comment dated September 19, 2019            |
| E-66   | Bell, D. – Letter of Comment dated September 19, 2019               |
| E-67   | Nell DeFrane, M. – Letter of Comment dated September 22, 2019       |
| E-68   | White, E. – Letter of Comment dated September 22, 2019              |
| E-69   | Gagnon, G. and C. – Letter of Comment dated September 24, 2019      |
| E-70   | Gustafson, C. – Letter of Comment dated September 24, 2019          |
| E-71   | Milacek, M. – Letter of Comment dated September 25, 2019            |
| E-72   | Morrison, M. – Letter of Comment dated September 25, 2019           |
| E-73   | Stokes, K. – Letter of Comment dated September 26, 2019             |
| E-73-1 | Stokes, K. – Additional Letter of Comment dated September 26, 2019  |
| E-74   | White, J. – Letter of Comment dated September 26, 2019              |
| E-75   | Granger, W. – Letter of Comment dated September 27, 2019            |

|        |   |
|--------|---|
| E-76   | Steiner, M. – Letter of Comment dated September 28, 2019              |
| E-77   | Tougint, S. – Letter of Comment dated September 29, 2019              |
| E-78   | Van Straten, R. – Letter of Comment dated October 2, 2019             |
| E-79   | Reeve, C. – Letter of Comment dated October 2, 2019                   |
| E-80   | McGibbon, K. – Letter of Comment dated October 2, 2019                |
| E-81   | Klaver, B. – Letter of Comment dated October 2, 2019                  |
| E-82   | Garreau, N. – Letter of Comment dated October 3, 2019                 |
| E-82-1 | Garreau, N. – Letter of Comment dated October 11, 2019                |
| E-83   | Schultz, T. – Letter of Comment dated October 5, 2019                 |
| E-84   | Hoy, C. – Letter of Comment dated October 9, 2019                     |
| E-85   | Kitsch, K. – Letter of Comment dated October 9, 2019                  |
| E-86   | Dorman, J. – Letter of Comment dated October 10, 2019                 |
| E-87   | Brodie, L. – Letter of Comment dated September 20, 2019               |
| E-88   | Robinson, C. – Letters of Comment dated October 14, 2019              |
| E-89   | Paduch, M. – Letter of Comment dated October 16, 2019                 |
| E-90   | Howell, H. – Letter of Comment dated October 17, 2019                 |
| E-91   | Williams G. – Letter of Comment dated October 17, 2019                |
| E-92   | Borden, I. – Letter of Comment dated October 18, 2019                 |
| E-93   | Long, R. – Letter of Comment dated October 19, 2019                   |
| E-94   | Cooper, B. – Letter of Comment dated October 21, 2019                 |
| E-95   | Menzies, M. – Letter of Comment dated October 26, 2019                |
| E-96   | Herd, D. – Letter of Comment dated October 26, 2019                   |
| E-97   | 411 Seniors Centre Society – Letter of Comment dated October 29, 2019 |
| E-98   | Chu, P. – Letter of Comment dated October 28, 2019                    |
| E-99   | Lapointe, J. – Letter of Comment dated October 29, 2019               |
| E-100  | L. Mary – Letter of Comment dated October 31, 2019                    |

|       |   |
|-------|---|
| E-101 | Nelson, N. – Letter of Comment dated October 30, 2019         |
| E-102 | Witkowskyj, C. – Letter of Comment dated October 31, 2019     |
| E-103 | Lung, M. – Letter of Comment dated November 1, 2019           |
| E-104 | Harper, D. – Letter of Comment dated November 4, 2019         |
| E-105 | Ewan, G. – Letter of Comment dated November 5, 2019           |
| E-106 | Scherger, C. – Letter of Comment dated November 5, 2019       |
| E-107 | Radford, A. – Letter of Comment dated November 5, 2019        |
| E-108 | Simon, R. – Letter of Comment dated October 15, 2019          |
| E-109 | Andrews, S. – Letter of Comment dated November 11, 2019       |
| E-110 | Moved – Now Exhibit D-17-1                                    |
| E-111 | Seguin, A. – Letter of Comment dated November 9, 2019         |
| E-112 | Dunn, A. – Letter of Comment dated November 7, 2019           |
| E-113 | Carnegie, D. – Letter of Comment dated November 13, 2019      |
| E-114 | Sommerville, D. – Letter of Comment dated November 14, 2019   |
| E-115 | Szaniszlo, A. – Letter of Comment dated November 15, 2019     |
| E-116 | Chansel, P. – Letter of Comment dated November 14, 2019       |
| E-117 | Don, K. – Letter of Comment dated November 15, 2019           |
| E-118 | Erlenbusch, P. – Letter of Comment dated November 14, 2019    |
| E-119 | Seidelman, R. – Letter of Comment dated November 14, 2019     |
| E-120 | Fodor, I. – Letter of Comment dated November 15, 2019         |
| E-121 | Geisbrecht, T. – Letter of Comment dated November 16, 2019    |
| E-122 | Hollingsworth, A. – Letter of Comment dated November 17, 2019 |
| E-123 | Nikirk, T. – Letter of Comment dated November 18, 2019        |
| E-124 | BC FORUM – Letter of Comment dated November 21, 2019          |
| E-125 | Wilson, L. – Letter of Comment                                |
| E-126 | Coolen, S. - Letter of Comment dated November 28, 2019        |

- E-127      Giese, D. – Letter of Comment dated November 4, 2019
- E-128      Hleck, T. – Letter of Comment dated December 17, 2019
- E-129      Kenyon, N. – Letter of Comment dated September 16, 2020
- E-130      Toope, L. – Letter of Comment dated November 29, 2020