



ORDER NUMBER
G-64-26

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

and

British Columbia Hydro and Power Authority
Net Metering Service Rates

BEFORE:

M. Jaccard, Panel Chair
T. A. Loski, Commissioner
W. E. Royle, Commissioner

on March 24, 2026

ORDER

WHEREAS:

- A. On June 27, 2024, pursuant to sections 58 to 61 of the *Utilities Commission Act*, British Columbia Hydro and Power Authority (BC Hydro) filed with the British Columbia Utilities Commission (BCUC), a 2024 Rate Design Application (2024 RDA), which included a proposal for changes to several rates, including the net metering service rate;
- B. By Order G-33-25 dated February 19, 2025, the BCUC ordered that the net metering service rate proposals would not be reviewed as part of the proceeding to review the 2024 RDA. The BCUC found a separate process to review the net metering service rate proposals was warranted;
- C. By Order G-39-25 dated February 21, 2025, the BCUC established the Net Metering Service Rates proceeding (Net Metering Proceeding) with a scope limited to BC Hydro's net metering service rate proposals. In addition, the BCUC ordered that all interveners from the 2024 RDA proceeding, except for Wyse Meter Solutions Inc., were automatically registered as interveners in the Net Metering Proceeding and that the entirety of the 2024 RDA proceeding record would form part of the Net Metering Proceeding record;
- D. On March 20, 2025, BC Hydro filed a Net Metering Evidentiary Update (Evidentiary Update), including a proposed regulatory process and timetable. In its 2024 RDA and the Evidentiary Update, BC Hydro seeks BCUC approval of the following:
 - i. Closing Rate Schedule 1289 – Net Metering Service Rate (RS 1289), to new customers, effective March 31, 2026;
 - ii. Establishing a new Rate Schedule 2289 – Self-Generation Service Rate (RS 2289), effective April 1, 2026;
 - iii. A transition period for moving existing RS 1289 customers to RS 2289, as follows:

- a. Customers in RS 1289 who did not receive BC Hydro's solar rebate to stay in RS 1289 for a period of 20 years from their respective Net Metering Service start dates;
 - b. Customers in RS 1289 who received BC Hydro's solar rebate to transition to RS 2289 on April 1, 2026;
 - iv. Establishing a new Rate Schedule 2290 – Community Generation Service Rate (RS 2290), effective April 1, 2026;
 - v. An energy price for net generation under the Self-Generation Service Rate (RS 2289) and the Community Generation Service Rate (RS 2290) of 10 cents per kilowatt hour; and
 - vi. Amendments to the Electric Tariff Table of Contents, Electric Tariff Terms and Conditions and Rate Schedule 2101 (RS 2101);
- E. By Orders G-39-25, G-105-25, G-145-25, G-254-25 and G-3-26, the BCUC established and amended the regulatory timetable, which included one round of information requests (IRs) to BC Hydro, the filing of intervenor evidence, one round of IRs on intervenor evidence, the filing of rebuttal evidence by BC Hydro, one round of IRs on BC Hydro's rebuttal evidence, an oral hearing, final and reply arguments and supplementary final and reply arguments;
- F. BC Hydro requests the following exhibits be kept confidential either to protect the privacy of individuals mentioned in the documents or to comply with terms of BC Hydro's subscription to a product that prevents dissemination to third parties:
- i. Exhibit B-4-1, BC Hydro confidential responses to Intervener IR No. 1;
 - ii. Exhibit B-13-1, BC Hydro confidential responses to BCUC IR No. 1; and
 - iii. Exhibit B-29-1, BC Hydro confidential responses to Intervener IR No. 1 on rebuttal evidence; and
- G. The BCUC has reviewed the evidence and arguments filed in this proceeding and makes the following determinations.

NOW THEREFORE pursuant to sections 59 to 61 of the UCA, and for the reasons outlined in the decision accompanying this order, the BCUC orders as follows:

1. RS 2289, as shown in Exhibit B-35, BC Hydro Undertaking 3, Attachment 2, is approved effective July 1, 2026.
2. The Net Metering Service Rate (RS 1289) is closed to new customers effective July 1, 2026.
3. Amendments to RS 1289, as shown in Exhibit B-35, BC Hydro Undertaking 3, Attachment 2, and as adjusted in accordance with Section 2.8 of the decision accompanying this order, are approved effective July 1, 2026.
4. RS 2290, as shown in Exhibit B-35, BC Hydro Undertaking 3, Attachment 2, and as adjusted in accordance with Section 3.6 of the decision accompanying this order, is approved effective July 1, 2026.
5. Amendments to the Electric Tariff Table of Contents, Electric Tariff Terms and Conditions and RS 2101, as shown in Exhibit B-35, BC Hydro Undertaking 3, Attachment 2, are approved effective July 1, 2026.
6. BC Hydro is directed to file revised tariff pages with the BCUC for endorsement, reflecting the approvals in this order and the accompanying decision, within 30 days of the date of this order.

7. BC Hydro is directed to file an evaluation report with the BCUC on RS 2289 and RS 2290 by April 30, 2030, as outlined in Section 5.0 of the decision accompanying this order.
8. Information filed confidentially by BC Hydro will be held confidential unless the BCUC determines otherwise.
9. BC Hydro is directed to comply with all other directives and determinations contained in the decision accompanying this order.

DATED at the City of Vancouver, in the Province of British Columbia, this 24th day of March 2026.

BY ORDER

Electronically signed by Mark Jaccard

M. Jaccard
Commissioner

British Columbia Hydro and Power Authority
Net Metering Service Rates

DECISION

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Executive Summary

The British Columbia Hydro and Power Authority (BC Hydro) Net Metering Service Rate under Rate Schedule 1289 allows residential and commercial customers to install clean on-site energy generation with capacity up to 100 kilowatts to serve all or part of their electricity needs. When Net Metering customers generate more electricity than is needed at their premises, the surplus electricity is injected to the BC Hydro grid and compensated at rates approved by the British Columbia Utilities Commission (BCUC).

On June 27, 2024, BC Hydro filed its 2024 Rate Design Application with the BCUC, seeking approval of changes to several rates, including the Net Metering Service Rate. The BCUC determined that a separate process to review changes to BC Hydro's net metering program was warranted and established the Net Metering proceeding.¹ On March 20, 2025, BC Hydro filed its Net Metering Evidentiary Update to the 2024 Rate Design Application.

In recent years, the Net Metering Service Rate has experienced significant growth in participating customers, which is forecast to lead to material cost-shifting between participating and non-participating ratepayers. To address this concern, BC Hydro proposes an update to its net metering service. In addition, BC Hydro proposes the establishment of the Community Generation Service Rate under Rate Schedule 2290 to enable multiple customers to contribute to and benefit from shared generating facilities.

The Panel approves the new Self-Generation Service Rate under Rate Schedule 2289 and the Community Generation Service Rate under Rate Schedule 2290, effective July 1, 2026. The Panel also approves closing the Net Metering Service Rate, effective July 1, 2026. In addition, the Panel approves amendments to the Electric Tariff Table of Contents and Terms and Conditions, and the Residential Service Time of Day Rate under Rate Schedule 2101, effective July 1, 2026.

As part of its decision, the Panel finds it reasonable to implement a net billing compensation mechanism and an Energy Price of 10 cents per kilowatt hour for electricity injected to BC Hydro grid for both the Self-Generation Service Rate and the Community Generation Service Rate as this approach better reflects the value of the energy injected to the BC Hydro system, and provides customers with a simple and certain price that is easy to understand and to administer. In the case of the Self-Generation Service Rate, this compensation mechanism also reduces the cost-shifting to non-participating customers relative to the Net Metering Service Rate.

For the Self-Generation Service Rate, the Panel finds it reasonable to include a net injection limit of 100 kilowatts per phase after serving the customer's load². For those customers in the Net Metering Service Rate not approved to receive a solar rebate, the Panel determines such customers will need to transition to the Self-Generation Service Rate after 10 years from the date they joined the Net Metering Service Rate. A 10-year transition period balances the reduction of cost-shifting from non-participants with the investment decisions made by existing Net Metering customers.

For the Community Generation Service Rate, the Panel approves a 2 megawatt net injection limit per Community Generation facility, which the Panel views will reduce the barrier to entry in the program due to increased economies of scale compared to BC Hydro's proposed 1 megawatt limit. Additionally, the Community Generation Service Rate includes safeguards that will ensure the program maintains a focus of community participation.

¹ Order G-33-25 dated February 19, 2025.

² Customers' electrical systems have one or three phases; therefore, a customer net injection limit will be 100 kilowatt hours or 300 kilowatt hours.

The Panel directs BC Hydro to file with the BCUC an evaluation report on the Self-Generation Service Rate and the Community Generation Service Rate by April 30, 2030. This evaluation interval strikes a reasonable balance between gathering enough operational experience on the Self-Generation Service Rate and the Community Generation Service Rate to provide meaningful data for evaluation, while allowing a timely opportunity to revisit both rate schedules prior to potential changes in BC Hydro's energy costs.

1.0 Introduction

1.1 Background

The British Columbia Hydro and Power Authority's (BC Hydro) net metering program, which is available through Rate Schedule 1289 (RS 1289 or Net Metering), was established in 2004³ and has been updated over time through multiple British Columbia Utilities Commission (BCUC) review processes.⁴ Net Metering allows residential and commercial customers to install clean on-site energy generation with capacity up to 100 kilowatts (kW) to serve all or part of their electricity needs. When Net Metering customers generate more electricity than is needed at their premises, the surplus electricity is injected to the BC Hydro grid. The customers are compensated for the injected electricity at rates approved by the BCUC.⁵ The structure of RS 1289 has largely remained the same since it was originally established and updates have mainly involved changes to the price for generation injected to the grid or to the limit of the customers' facilities installed capacity.⁶

On June 27, 2024, BC Hydro filed its 2024 Rate Design Application (2024 RDA) with the BCUC, seeking approval of changes to several rates, including transitioning from a net metering rate design to a net billing rate design.⁷ The BCUC determined that a separate process to review changes to BC Hydro's net metering program was warranted, and established the present Net Metering proceeding (Net Metering Proceeding).⁸ This separate proceeding included the entire 2024 RDA proceeding record as part of the Net Metering Proceeding record and all interveners in the 2024 RDA proceeding, except Wyse Meter Solutions Inc., were automatically registered as interveners in the Net Metering Proceeding.⁹

In the 2024 RDA, BC Hydro proposed structural changes to rate schedules intended to facilitate the installation of clean or renewable generating facilities by customers, including proposals to change the limitations on the injection of power to the BC Hydro grid, the compensation mechanism for generation injected to the grid, the closing of the existing RS 1289 and creation of two other rate schedules, among other components.¹⁰ On March 20, 2025, BC Hydro filed its Net Metering evidentiary update (Evidentiary Update) to the 2024 RDA, which included economic analysis in support of a proposed energy price for generation injected to the BC Hydro grid (Energy Price) and updates to certain proposals outlined in the 2024 RDA.¹¹ The 2024 RDA and the Evidentiary Update are collectively referred in this decision as BC Hydro's Application (Application).

1.2 Approvals Sought

BC Hydro seeks approval of the following:¹²

1. Establishment of Rate Schedule 2289 – Self-Generation Service Rate (RS 2289) effective April 1, 2026. RS 2289 is a new rate for self-generation that builds off RS 1289, but includes two key changes:
 - a. a different compensation mechanism based on net billing in place of the net metering compensation mechanism under RS 1289; and

³ Order G-26-04 dated March 12, 2004.

⁴ Orders G-90-05, G-4-09, G-57-12, G-104-14, G-116-15, G-100-18 and G-168-20 dated September 22, 2005, January 30, 2009, May 14, 2012, July 25, 2014, July 9, 2015, June 1, 2018, and June 23, 2020, respectively.

⁵ Exhibit B-1, p. 5-4.

⁶ *Ibid.*, pp. 2-9 to 2-10.

⁷ *Ibid.*, pp. 1-1 to 1-4.

⁸ Order G-33-25 dated February 19, 2025.

⁹ Order G-39-25 dated February 21, 2025.

¹⁰ Exhibit B-1, p. 1-3.

¹¹ Exhibit B-8, p. 1.

¹² Exhibit B-1, pp. 5-1 to 5-2; Exhibit B-8, pp. 43-44; BC Hydro Final Argument, pp. 2-3; Exhibit B-35, BC Hydro Undertaking 3.

- b. a net injection limit in place of the nameplate capacity limit under RS 1289;
2. Closing of RS 1289 to new customers effective March 31, 2026;
3. A transition period for existing RS 1289 customers to move to RS 2289 as described below:
 - a. customers on RS 1289 who did not receive BC Hydro’s solar rebate will stay on that rate schedule for a period of 20 years from their Net Metering Service Start Dates; and
 - b. customers on RS 1289 who are approved to receive BC Hydro’s solar rebate will be transitioned to RS 2289 on April 1, 2026 (subject to the exercise of an opt-out from the solar rebate);
4. Establishment of Rate Schedule 2290 – Community Generation Service Rate (RS 2290) effective April 1, 2026. RS 2290 enables multiple customers to contribute to and benefit from shared generating facilities;
5. Energy Price: the compensation for net generation under both RS 2289 and RS 2290 will be 10 cents per kWh, and the compensation is to remain at this level for five years; and
6. BC Hydro will file with the BCUC an evaluation report on RS 2289 and RS 2290 by April 30, 2030. Should the outcome of the evaluation report warrant an amendment to RS 2289 and/or RS 2290, BC Hydro will apply for such amendments as part of the evaluation report submission.

In addition, BC Hydro proposed amendments to section 9.6 of the Electric Tariff Terms and Conditions and RS 2101 – Residential Service Time of Day, both effective April 1, 2026.¹³

1.3 Regulatory Process and Participants

Following the filing of the 2024 RDA on June 27, 2024, the BCUC established a public hearing and regulatory review process which included, among other things, intervener registration and one round of information requests (IRs) which were relevant to the Net Metering Service Rates.¹⁴

In February 2025, the BCUC established a separate process to continue the review of BC Hydro’s Net Metering Service Rates proposals. By Orders G-39-25, G-105-25, G-145-25, G-254-25 and G-3-26, the BCUC established and amended the regulatory timetable, which included one round of IRs to BC Hydro, the filing of intervener evidence, one round of IRs on intervener evidence, the filing of rebuttal evidence by BC Hydro, one round of IRs on rebuttal evidence, an oral hearing, final and reply arguments, and supplementary final and reply arguments.¹⁵ The supplementary final and reply arguments were on cost-shifting to address the submission of an errata on this subject by BC Hydro’s independent expert, Dunskey Energy and Climate Advisors (Dunskey),¹⁶ filed at the time of BC Hydro’s reply argument on the remaining matters in this proceeding.

The following interveners and intervener groups were registered in this proceeding:

- EcoSmart Foundation Inc. (EcoSmart);
- Movement of United Professionals (MoveUP);
- BC Sustainable Energy Association (BCSEA);

¹³ Exhibit B-35, BC Hydro Undertaking 3, Attachment 2.

¹⁴ Order G-190-24 dated July 16, 2024.

¹⁵ Order G-39-25 dated February 21, 2025, Order G-105-25 dated April 23, 2025, G-145-25 dated June 16, 2025, and G-254-25 dated October 27, 2025.

¹⁶ Exhibit B-8-2.

- Council of Senior Citizens' Organizations of BC, Active Support Against Poverty, Disability Alliance BC, Tenants Resource and Advisory Centre, and Together Against Poverty Society (COSCO)¹⁷ and Residential Consumer Intervener Association (RCIA);
- Commercial Energy Consumers Association of BC (the CEC);
- Community Solar Coalition (CSC);
- Charge Solar, Riverside Energy Systems and Shift Energy Group Inc. (Charge Solar et al.);¹⁸
- The City of Vancouver, Metro Vancouver Regional District, District of North Vancouver, and the City of Richmond (Local Government Interveners or LGI);
- Kwadacha Nation and Tsay Keh Dene Nation, together the Zone II Ratepayers Group (Zone II RPG);
- Clean Energy Association of British Columbia (CEBC);
- Fortis Energy Inc. and FortisBC Inc.;
- Lulu Island Energy Company Ltd.;
- Saulteau First Nations;
- Gitga'at First Nation;
- High Tide Energy Inc.; and
- CB Powerline Ltd.

Ecosmart, CSC, Charge Solar et al., and CEBC filed intervener evidence.

The BCUC received letters of comment from existing RS 1289 customers, individuals and entities involved in the development of distributed generation projects, and other interested parties. Many of the letters raise the following issues:

- existing RS 1289 customers express concern that their investment in a generating facility will have longer payback periods;
- concern that lower compensation for the generation injected to BC Hydro grid will limit the growth of distributed energy generation in BC:
 - some parties consider that the expansion of distributed energy generation is positive for the province of BC and its development should be promoted; and
 - operators in the solar industry express concern that an overall reduction in compensation for generation injected to BC Hydro grid will negatively impact the activity in that economic sector.

1.4 Legislative Framework and Ratemaking Principles

Sections 59 to 61 of the *Utilities Commission Act* (UCA) pertain to the setting of rates. Pursuant to sections 59 and 60(1)(a) and (b) of the UCA, when setting rates, the BCUC must take into account all matters that it considers proper and relevant affecting the rate, and, among other things, must have due regard to setting a rate that is not unjust or unreasonable. Section 59(4) states the BCUC is the sole judge of whether a rate is unjust or unreasonable, and whether there is undue discrimination in respect of a rate or service. Section 60(1)(b.1) states the BCUC may use any mechanism, formula or other method of setting the rate that it considers advisable and may order that the rate derived from such a mechanism, formula or other method is to remain in effect for a specified period.

¹⁷ Formerly British Columbia Old Age Pensioners' Organization, et al. (BCOAPO). Exhibit A-50.

¹⁸ During part of the proceeding, High Tide Energy Inc. was part of this intervener group.

BC Hydro states its proposals in the Application are guided by the eight rate design criteria identified by Dr. James Bonbright in *Principles of Public Utility Rates* (Bonbright Criteria). In the Evidentiary Update, BC Hydro provides its assessment of its Self-Generation Service Rate and Community Generation Service Rate proposals against the Bonbright Criteria.¹⁹ The BCUC has previously declined to utilize the Bonbright Criteria strictly as a pass/fail test applied in a mechanistic manner.²⁰

1.5 Decision Framework and Structure

This decision is structured to mirror the framework used by the Panel to review the evidence and arguments presented in this proceeding.

The Panel’s review of the Application focuses on matters pertinent to a rate design proceeding. This decision does not address submissions on issues that are the subject of other regulatory processes (for example long-term resource planning or demand side measure expenditure schedules), or are outside of the jurisdiction of the BCUC. Additionally, while the Panel has reviewed the submissions of all parties, this decision focuses on summarizing the issues that are material to the Panel’s determinations and does not seek to address every argument put forward by interveners.

In Section 2.0, the Panel considers RS 1289 and RS 2289 and addresses their proposed attributes including: changes in the limits to energy injection to the grid, modifications to the compensation mechanism, the fairness of the compensation, the potential impact on uptake, the transition process for existing RS 1289 customers, and whether the consultation process was adequate.

Section 3.0 reviews RS 2290 and its proposed attributes, including whether the same energy price should apply to RS 2289 and RS 2290, the proposed net injection limit, and other proposed rules applicable to community generation facilities. The Panel also addresses BC Hydro’s proposal to credit community generation customers.

Section 4.0 reviews other proposed amendments to BC Hydro’s tariff that are impacted by the implementation of RS 2289 and RS 2290.

In Section 5.0, the Panel provides its determination on the evaluation process.

In Section 6.0, the Panel considers confidentiality requests.

2.0 Net Metering (Rate Schedule 1289) and Self-Generation (Rate Schedule 2289) Service Rates

2.1 Introduction

BC Hydro customers that install a generating facility and take service under RS 1289 can generate electricity for their own use and, if there is remaining electricity injected to BC Hydro grid, called net generation or excess generation (Net Generation), customers can apply the Net Generation as a credit to offset electricity consumption in a future billing cycle. When customers do not generate enough electricity to meet their needs at a point in time, they buy the remaining electricity they require from BC Hydro in accordance with the rate schedule under which they receive service. In this way, RS 1289 is an “add-on” rate that applies alongside a customer’s base rate.²¹

¹⁹ Exhibit B-8, pp. 40-42.

²⁰ BC Hydro Optional Residential Time-of-Use Rate Application, Decision and Order G-342-23, p. 16.

²¹ Exhibit B-1, p. 5-4.

The Net Metering compensation mechanism under RS 1289 works as follows: in customers' generation accounts, both the Net Generation and the electricity consumption are banked as a volume of kilowatt hours (kWh). Once every 12 months, if customers have remaining credits, they receive a surplus energy payment at the average market price²² over the past year.²³

BC Hydro proposes to close RS 1289 to new customers once the Self-Generation Service Rate is in effect, with a transition period for existing customers to remain on RS 1289, before being migrated to the Self-Generation Service Rate, i.e. RS 2289.²⁴

RS 2289 introduces some structural changes to RS 1289 to reduce the growth in cost-shifting between participating and non-participating customers. The main changes include the compensation mechanism for Net Generation, and replacing limits to customers' project size with limits to energy injection to BC Hydro grid (Net Injection Limit).²⁵

In the following sections, the Panel examines the key issues arising in this proceeding regarding BC Hydro's proposals for RS 1289 and RS 2289. In Section 2.8 the Panel provides its overall determination on the proposals.

2.2 Should the Compensation Mechanism be Modified from Net Metering to Net Billing?

In 2003, when the BCUC directed BC Hydro to propose a net metering rate, the BCUC stated its expectation that the rate would not impose any material costs on non-participating ratepayers.²⁶ BC Hydro notes that its 2019 application to amend the Net Metering Service Rate under RS 1289 indicated that the RS 1289 rate design would become more problematic as the program grew, because the growing cost-shifting between participating and non-participating customers could become material.²⁷

BC Hydro states that participation in RS 1289 has increased exponentially since its establishment in 2004, particularly in recent years. As of the end of October 2025, there are approximately 15,000 customers on the rate with a total generation capacity of 132 megawatts (MW).²⁸ The implications of this growth on cost-shifting are the drivers of BC Hydro's proposed changes and the introduction of RS 2289.²⁹

BC Hydro proposes a new rate schedule instead of modifications to the existing RS 1289 because, in its view, it is more appropriate to pursue rate design modifications holistically by adjusting rate designs over time in response to emerging needs, trends and customer feedback.³⁰

BC Hydro's proposal for RS 2289 is a net billing compensation mechanism (Net Billing) with an instantaneous netting interval. The netting interval is the window of time where an excess kWh can be used to offset a kWh consumed by the customer. Netting intervals can range from instantaneous, where each kWh injected into the grid is immediately converted into a dollar value, to yearly where a customer has one year to apply those kWhs against their consumption at the retail energy rate, before they are converted into a dollar value. BC Hydro proposes an instantaneous netting interval on the basis that all longer intervals would re-introduce some degree

²² The energy price is calculated every January 1st based on the daily average Mid-Columbia prices for the previous calendar year, converted to Canadian dollars using the average annual exchange rate from the Bank of Canada for that year. (Exhibit B-8, Appendix A-1, p. 21)

²³ Exhibit B-1, pp. 5-22 to 5-23.

²⁴ *Ibid.*, p. 5-1.

²⁵ *Ibid.*, pp. 5-1 to 5-2.

²⁶ BCUC, *Letter No. L-37-03*, p. 2.

²⁷ Oral Hearing Revised Transcript Volume 1, November 17, 2025, p. 28.

²⁸ *Ibid.*, p. 27.

²⁹ *Ibid.*, p. 28.

³⁰ Exhibit B-1, p. 5-29.

of disconnect between the value of the Net Generation and how the Net Generation is compensated. Under Net Billing, the Net Generation would still be applied to a customer's account but would be compensated at a different price than the customer's retail energy rate, this being at the energy price corresponding to the time in which the Net Generation is supplied. Customers will be able to offset their consumption with their generation, i.e. at the retail rate, applying an instantaneous netting interval. BC Hydro states that Net Billing will provide a foundation for introducing increased rate choices and will better reflect the value of the Net Generation to the BC Hydro system.³¹

Overall, BC Hydro considers its proposed compensation mechanism improves fairness both amongst participating ratepayers as well as between participating and non-participating ratepayers. In the first case, Net Billing improves fairness because all participating customers will receive the same compensation for their Net Generation, instead of based on their retail electricity rate. In the second case, BC Hydro's proposed compensation for Net Generation reflects the utility benefit value of that energy, which will reduce the cost-shifting that currently occurs from participating to non-participating ratepayers.³²

Positions of the Parties

Some parties view the use of Net Billing as a fairer approach to compensation for Net Generation at a value that is aligned with BC Hydro's avoided energy cost as opposed to compensation at the retail rate of each customer. These parties note that Net Billing also supports a reduction in cost-shifting over time and allows for a more sustainable framework for customer-owned generation.³³

Other interveners oppose the closing of RS 1289 to new customers and/or propose that the BCUC postpone a decision on introducing RS 2289 for some or all customers until RS 1289 reaches an objective threshold percentage of eligible customers or by 2035, on the basis that this will allow the self-generation market to advance from its very early development phase and will allow the BCUC and stakeholders to evaluate actual growth trends. These interveners express concern that changes in the compensation mechanism will negatively affect customer participation growth in the distributed energy generation rate schedules, with associated effect on the local economy. Additionally, given the small contribution of RS 1289 to BC Hydro's total supply, the associated cost-shifting is not material enough to justify the need of a new tariff.³⁴ BCSEA, who in principle opposes the closing of RS 1289 for RS 2289, submits that if the Panel decides to proceed with BC Hydro's proposals it will support a Net Billing mechanism for RS 2289 and RS 2290.³⁵

In reply to interveners who propose that changes to RS 1289 be deferred, BC Hydro submits that these parties have provided little or no justification for these requests and do not address the foregone benefits of implementing the changes now, such as improving fairness amongst customers with self-generation and between customers with and without self-generation.³⁶

CEBC submits that the use of instantaneous netting is not fair.³⁷ BCSEA and Charge Solar et al. express concern that existing solar and energy modeling tools do not support BC Hydro's proposed instantaneous netting interval, but support an hourly netting interval.³⁸ Charge Solar et al. propose BC Hydro implement an hourly

³¹ Exhibit B-1, pp. 5-30 to 5-31.

³² Oral Hearing Revised Transcript Volume 1, November 17, 2025, pp. 29-30.

³³ MoveUP Final Argument, p. 1; Zone II RPG, p. 1; BCSEA Final Argument, p. 4; Cosco/RCIA, p. 5; CEC Final Argument, p. 2.

³⁴ BCSEA Final Argument, p. 2, CEBC Final Argument, p. 3, Charge Solar et al. Final Argument, pp. 9, 11; Charge Solar et al. Supplementary Final Argument, p. 3; CSC Final Argument, p. 11.

³⁵ BCSEA Final Argument, p. 2.

³⁶ BC Hydro Reply Argument, p. 11; BC Hydro Reply Argument on Cost-Shifting, p. 6.

³⁷ CEBC Final Argument, p.7.

³⁸ BCSEA Final Argument, p. 11; Charge Solar et al. Final Argument, p. 4.

netting interval which is achievable without changes to its metering infrastructure.³⁹ BC Hydro does not address CEBC, BCSEA and Charge Solar et al. concerns in its reply.

Panel Determination

The Panel finds the use of a net billing compensation mechanism with an instantaneous netting interval for RS 2289 to be reasonable.

In Order G-168-20, the BCUC stated: “RS 1289 is a rate schedule, and as such is subject to change from time to time. Moreover, ratepayers who have chosen to enroll into the Net Metering Program have done so with no guarantee that the terms under which they entered the program would remain inviolate.”⁴⁰

The Panel finds that the increasing level of participation in RS 1289, a rate that has been in place for approximately two decades, justifies the introduction of changes that reduce the cost-shifting between participating and non-participating customers while facilitating ongoing participation. We find a net billing compensation mechanism is fairer to non-participating customers because of the expected reduction of the cost-shifting.

The Panel considers it is reasonable and fair that the compensation for Net Generation reflects the value of that energy to the BC Hydro system. We observe BC Hydro has explained the differences between the value of Net Generation and the retail energy charge, and that the change in compensation mechanism specifically addresses the cost-shifting associated with the value of energy injected to BC Hydro grid. The retail energy charge also differs by customer class in terms of the costs that are recovered: the retail energy charge for residential and small general service customers accounts for all energy and demand related costs and a portion of customer-related costs, while medium and large general service customers have separate demand charges.⁴¹ To the extent the value of Net Generation to the utility differs from the retail rate (either positively or negatively), this causes a cost-shifting from non-participating customers to net metering customers, or vice versa. Additionally, compensation at the retail rate will not provide the appropriate price signal for customers to provide Net Generation if the retail rate is not aligned with the value of the energy to BC Hydro’s system. Hence the Panel considers it is reasonable and fair that the compensation for Net Generation be different from customers’ retail rates.

The Panel also finds an instantaneous netting interval is preferable to other intervals because it better supports the alignment of the value of the Net Generation to its compensation.

2.3 Is BC Hydro’s Proposed Energy Price Reasonable?

BC Hydro proposes an Energy Price of 10 cents per kWh for all Net Generation under both RS 2289 and RS 2290, to be reviewed in five years.⁴² BC Hydro states the Energy Price should no longer be based on market value because the net metering program has grown in generation capacity such that energy contribution from net metering customers now has a material impact on BC Hydro’s future resource needs and other resource acquisitions.⁴³ According to BC Hydro, the inclusion of Net Generation in BC Hydro’s long term planning warrants its valuation based on the long-run marginal cost,⁴⁴ which represents BC Hydro’s cost of acquiring new

³⁹ Charge Solar et al. Final Argument, p. 12.

⁴⁰ Order G-168-20 dated June 23, 2020, p. 12.

⁴¹ Exhibit B-1, pp. 5-24 to 5-25.

⁴² Exhibit B-8, p. 1.

⁴³ Exhibit B-13, BCUC IR 1.2.2.

⁴⁴ In February 2025, BC Hydro updated the long-run marginal cost of Energy to \$97 per MWh (in fiscal 2025 dollars) (Exhibit B-8, p. 25.)

resources.⁴⁵ BC Hydro states the proposed Energy Price of 10 cents per kWh is intended to represent fair compensation for the actual economic value (utility benefit value) of Net Generation,⁴⁶ which generally aligns with the assessment of utility benefits in the Dunskey Value and Cost-Shifting Report.⁴⁷ BC Hydro submits an Energy Price that reflects the value of Net Generation sends an appropriate price signal to customers for their Net Generation.⁴⁸

Value of solar analysis

Dunskey explains its value of solar analysis evaluates and where possible quantifies the utility⁴⁹ and societal⁵⁰ benefits of solar photovoltaic (PV) generation in British Columbia, and submits it is performed consistent with the principles outlined in the National Standard Practice Manual as fundamental Benefit-Cost Assessment principles.⁵¹ Dunskey determines the average year-round value of solar PV generation from 2025 to 2050 and includes an assessment of its value during the winter peak period.⁵² Dunskey developed three distinct methodological frameworks to recognize the diverse and nuanced perspectives involved in determining the value of solar: i) avoided cost framework,⁵³ ii) expanded framework,⁵⁴ and iii) comprehensive framework.⁵⁵ Dunskey illustrates the value of solar of all three frameworks in Figure 1 below:

⁴⁵ Exhibit B-13, BCUC IR 1.2.2.

⁴⁶ Ibid., BCUC IR 1.8.1.

⁴⁷ Exhibit B-8, p. 23.

⁴⁸ Exhibit B-13, BCUC IR 1.8.1.

⁴⁹ The utility benefits components include energy, generation capacity, ancillary services, distribution line losses, transmission capacity and distribution capacity. The approach to quantifying the utility benefits for value of solar under each framework is laid out in Exhibit B-8, Appendix B-3, Table 2-2, pp. 5-6.

⁵⁰ The societal benefits components include job creation, economic impacts, land impacts, and environment and climate. The approach to quantifying the societal benefits for value of solar under each framework is laid out in Exhibit B-8, Appendix B-3, Table 2-3, p. 6.

⁵¹ Exhibit B-25, pp. 21-22.

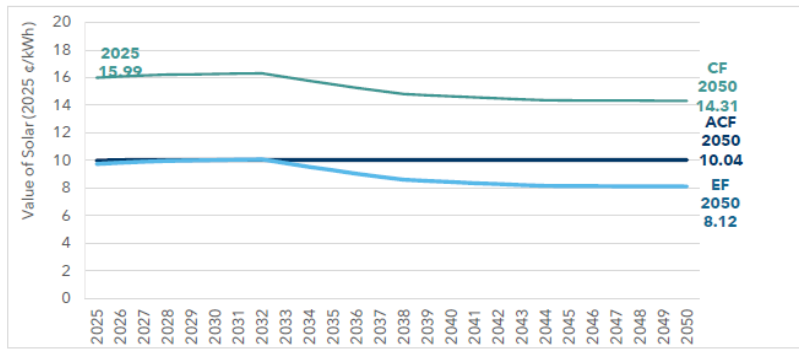
⁵² Exhibit B-8, Appendix B-3, p. i.

⁵³ The avoided cost framework focuses on key utility benefits and quantifies them with an approach that generally reflects the preliminary approach used to evaluate the avoided costs of solar presented in BC Hydro's engagement workshops for its 2024 Rate Design Application. (Exhibit B-8, Appendix B-3, p. i)

⁵⁴ The expanded framework extends the assessment beyond the avoided cost framework by incorporating additional quantifiable utility benefits that may not have been considered in the preliminary analysis. It also provides a more comprehensive – and often an alternative – methodology to quantify the value of solar from a utility system perspective. (Exhibit B-8, Appendix B-3, p. i)

⁵⁵ The comprehensive framework evaluates both utility and societal benefits by building on the valuation established under the extended framework for utility system benefits and expanding it to offer a holistic assessment of solar generation contributions to policy objectives capturing job creation, economic development and land-use impacts associated with behind-the-meter solar. (Exhibit B-8, Appendix B-3, p. i)

Figure 1: Dunsky’s Annual Value of Solar Across Frameworks⁵⁶



Dunsky notes the value of solar utility benefits under all three frameworks are closely aligned, with the avoided energy benefits being the primary driver of value across all frameworks representing more than 90 percent of benefits. BC Hydro presents Table 1 below showing the value of utility benefits as calculated by Dunsky under all three frameworks over the 2026 to 2030 period.

Table 1: Dunsky Five-Year Average Value of Utility Benefits under the Avoided Cost, Expanded, and Comprehensive Frameworks⁵⁷

Framework (cents per kWh)	2026	2027	2028	2029	2030	Average
Avoided Cost Framework	10.02	10.04	10.04	10.04	10.04	10.04
Expanded Framework and Comprehensive Framework ⁵⁸	9.84	9.91	9.97	10.0	10.03	9.95

Dunsky explains the comprehensive framework uses the evaluation established under the expanded framework for utility system benefits, with the additional consideration of societal and non-utility benefits.⁵⁹ The value of solar of approximately 16 cents per kWh in 2025 under the comprehensive framework reflects societal and non-utility benefits, and is largely driven by local job creation opportunities and economic development.⁶⁰

BC Hydro states that Dunsky’s different frameworks capture the uncertainty associated with the benefit and the corresponding value of solar, and produced a relatively narrow range of avoided cost values for utility benefits.⁶¹ BC Hydro generally considers Dunsky’s frameworks to be reasonable approaches to assessing the utility benefits of behind the meter solar PV. An Energy Price of 10 cents per kWh, to be reviewed in five years, generally aligns with the utility benefit values under Dunsky’s avoided cost framework (five-year average of 10.04 cents per kWh) and expanded framework / comprehensive framework (five-year average of 9.95 cents per kWh).⁶²

⁵⁶ Exhibit B-8, Appendix B-3, p. 15, Figure 3-2. CF refers to comprehensive framework, ACF refers to avoided cost framework, and EF refers to expanded framework.

⁵⁷ Exhibit B-8, p. 15.

⁵⁸ The comprehensive framework uses the evaluation established under the expanded framework for utility system benefits. (Exhibit B-8, p. 15)

⁵⁹ Exhibit B-8, p. 15, footnote 46.

⁶⁰ Ibid., Appendix B-3, Figure 3-1, p. 15.

⁶¹ Exhibit B-8, p. 3.

⁶² Ibid.

BC Hydro notes 99.5 percent of all customers taking service under RS 1289 have a solar Generating Facility, while some customers have hydro, wind, biogas and combination systems of wind and solar facilities. Dunsky's analysis only focuses on the value of solar.⁶³

Other considerations for the Energy Price determination

Regarding societal benefits, BC Hydro acknowledges that there might be societal benefits from behind-the-meter solar PV generation. However, BC Hydro states that the proposed Energy Price of 10 cents per kWh does not explicitly include compensation of any societal benefits achieved through behind-the-meter generation.⁶⁴ BC Hydro does not consider it to be appropriate to explicitly include societal benefits in the Energy Price because i) in BC Hydro's view, it is generally more appropriate for societal benefits to be compensated through non-ratepayer supported means (e.g., government programs); ii) the persistence of cost shifting already provides some financial support for broader societal benefits associated with behind-the-meter solar PV; and iii) the use of annual monthly energy price rather than hourly energy data in Dunsky's analysis overestimates solar weighted average energy benefits as it fails to account for the temporal variations in solar production and market prices.⁶⁵ This potential overcompensation provides some financial support for the broader societal benefits associated with behind-the-meter solar PV.⁶⁶

BC Hydro notes that to the extent the energy contribution from net metering would increase, this would generally decrease the amount of utility-scale clean or renewable energy the utility would acquire. Therefore, no additional value should be attributed to behind-the-meter solar generation on the basis of lowering overall greenhouse gas emissions.⁶⁷ As such, the value of behind-the-meter solar generation for BC Hydro should be based on the utility's long-run marginal cost, which represents its avoided costs of acquiring new resources.⁶⁸

Regarding locational value, BC Hydro notes while Dunsky's analysis of the value of solar included an assessment of locational value, BC Hydro does not propose location-varying pricing as part of this Application.⁶⁹ BC Hydro states that since Dunsky included a locational value which is represented in aggregate, any increases in the price for certain areas would necessitate a lower price in other areas. BC Hydro views this price differentiation as undesirable as it would be unjustifiable from a customer understanding and acceptance perspective.⁷⁰

Regarding time-varying value of customers' Net Generation, BC Hydro explains it has not made this proposal at this time because more time is required to assess the time-varying value of customers' Net Generation and to determine whether an appropriate time-varying compensation mechanism can be developed.⁷¹ BC Hydro states it intends to continue exploring the benefits and challenges of a time-varying add-on price for Net Generation after this proceeding concludes. BC Hydro further states it could file a separate, future application to the BCUC to propose a time-varying add-on price for Net Generation.⁷²

⁶³ Exhibit B-1, p. 5-25; Exhibit B-13, BCUC IR 1.5.4.

⁶⁴ Exhibit B-8, p. 27.

⁶⁵ *Ibid.*, pp. 27-28, Appendix B-3, p. 17

⁶⁶ *Ibid.*, p. 28.

⁶⁷ Exhibit B-15, CSC IR 1.1.8

⁶⁸ Exhibit B-13, BCUC IR 1.2.2

⁶⁹ Exhibit B-25, pp. 3-4, Exhibit B-8, p. 23.

⁷⁰ BC Hydro Reply Argument, pp. 14-15.

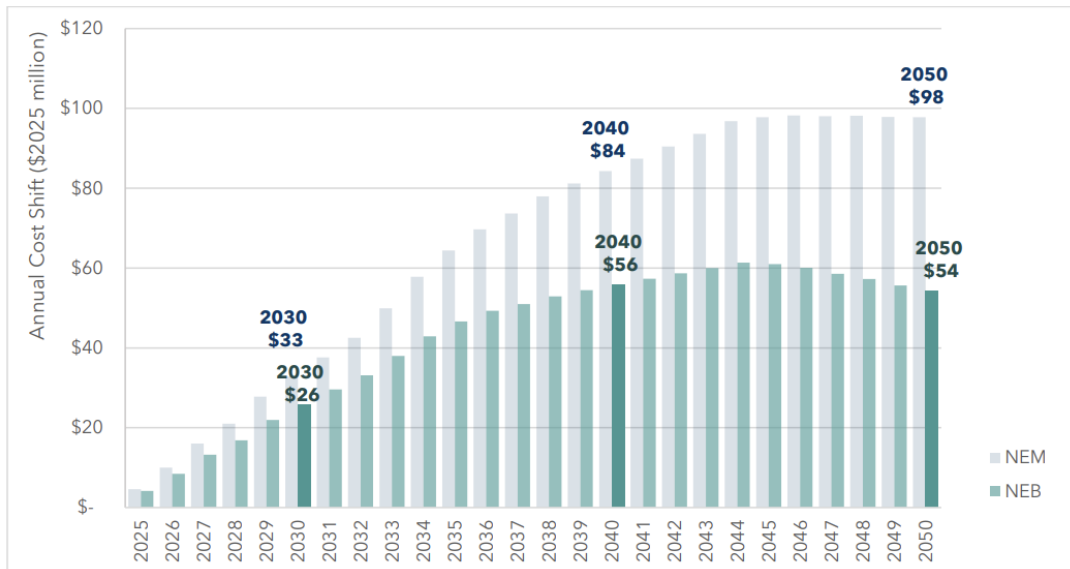
⁷¹ Exhibit B-8, p. 6

⁷² Exhibit B-13, BCUC IR 1.1.2.

Cost shifting

BC Hydro concludes that its proposal to change the compensation mechanism and the Energy Price will result in a reduction in cost shift, as supported by Dunsky's cost shifting assessment.⁷³ Dunsky presents Figure 2 below to illustrate the difference in cost shift under Net Metering and Net Billing over the period from 2025 to 2050.

Figure 2: Dunsky's Total Cost Shift Under Net Metering and Net Billing Across Rate Classes⁷⁴



Dunsky explains the cost shift attributed to behind-the-meter solar PV is driven by three components:

- i) **Fixed Cost Recovery:** Accounts for the portion of costs that cannot be avoided by self-consumed solar generation that needs to be recovered from the rate base;
- ii) **Program Cost Recovery:** Represents costs including administrative expenses and solar rebates that need to be recovered; and
- iii) **Export Credit Net Cost Recovery:** Represents the net cost to BC Hydro, after accounting for avoided costs, incurred when compensating participants for behind-the-meter solar generation injected to the grid. These costs are recovered through retail electricity sales.

Dunsky states under the current net metering program, Fixed Cost Recovery is the largest contributor to cost shifts, followed by Program Costs and Export Credit Net Cost Recovery. Under the proposed Net Billing mechanism, the Export Credit Net Cost Recovery component is effectively eliminated, as solar customers are compensated at a rate aligned with avoided costs.⁷⁵ BC Hydro explains its proposal in this Application only addresses cost shift due to Export Credit Net Cost Recovery, and that cost shifting persists due to the underlying retail rate and program costs, including rebates.⁷⁶ BC Hydro elaborates that addressing cost shift due to Fixed Cost Recovery would require rate design modifications in the underlying retail rate, and should be approached from an overall customer perspective rather than targeted at net metering customers.⁷⁷ Regarding cost shift due

⁷³ BC Hydro filed an errata on behalf of Dunsky to the cost-shifting assessment included in the Dunsky Value of Solar and Cost-Shifting Report on January 14, 2026 (Exhibit B-8-2). Dunsky notes this correction reduces the estimated magnitude of cost shifting under both Net Metering and Net Billing by roughly 65 percent relative to the initial results from the report, but does not materially change the key findings from the analysis. (Exhibit B-8-2, p. 1)

⁷⁴ Exhibit B-8-2, p. 2.

⁷⁵ Exhibit B-8, Appendix B-3, p. 45.

⁷⁶ Exhibit B-13, BCUC IR 1.8.1; Exhibit B-15, MoveUP IR 1.3.1.

⁷⁷ Ibid., BCUC IR 1.10.1.

to Program Cost Recovery, BC Hydro submits that it is appropriate for program costs to be recovered through general rates because the establishment of a net metering program reflects government policy goals. BC Hydro also notes cost shift arising from solar rebates is outside the scope of this proceeding.⁷⁸

Positions of the Parties

Interveners' positions on BC Hydro's proposed Energy Price are varied. Some argue the Energy Price should be lower for a number of reasons, including: to further reduce the cost shift; to recognize the overstated utility benefit of stand-alone behind-the-meter solar PV given that most BC Hydro substations are winter peaking; or on the basis that the actual cost of transmission on BC Hydro's system is underestimated.⁷⁹ Some support the 10 cents per kWh proposal as a reasonable proxy of BC Hydro's long-run marginal cost of new energy, adjusted upward for avoided delivery costs.⁸⁰ Others argue the Energy Price should be higher to recognize societal and locational benefits.⁸¹ A number of interveners submit any changes should be deferred, with varying proposed thresholds such as: until a complete and defensible distributed energy resources valuation framework is developed and tested through an appropriate proceeding;⁸² until the number of RS 1289 participants reaches a threshold percentage of eligible customers;⁸³ or until core elements of BC Hydro's rationale for the Application have been determined in the 2025 Integrated Resource Planning proceeding.⁸⁴

In reply, BC Hydro states that the divergence among intervener positions throughout this proceeding is an indication that its proposals in the Application strike an appropriate balance between competing considerations.⁸⁵ In response to proposals for deferring changes to the net metering program, BC Hydro submits that a change to self-generation is needed now. BC Hydro submits that it has provided comprehensive and detailed analysis supporting its rate proposals, and the record is sufficient for the BCUC to make a decision.⁸⁶

Regarding societal benefits, some interveners state that societal benefits should not be included in the Energy Price. Two interveners argue that it is not the responsibility of BC Hydro's ratepayers to compensate for any societal benefits and that any such compensation should come from government.⁸⁷ Charge Solar et al. are of the view that self-generation provides significant benefits to the province and uses the inadequate inclusion of societal benefits from the value of solar analysis as part of their support for their position that the Application should be deferred in its entirety.⁸⁸ CEBC argues that additional information is needed to address their concerns regarding BC Hydro's treatment of societal benefits.⁸⁹

BC Hydro submits that its proposed Energy Price for Net Generation does not provide compensation for societal benefits because i) it is generally more appropriate for such societal benefits to be compensated through non-ratepayer supported means (e.g., government programs); ii) the environment and climate benefits of distributed solar should be assumed to be zero due to the existing non-emitting resource mix and lack of planned development of emitting resources; and iii) societal benefits are considered in resource planning decisions, and

⁷⁸ Exhibit B-15, MoveUP IR 1.3.1.

⁷⁹ MoveUP Final Argument, pp. 8-9; COSCO-RCIA Final Argument, p. 15; the CEC Final Argument, p. 28.

⁸⁰ BCSEA Final Argument, pp. 4-5.

⁸¹ Charge Solar et al. Final Argument, p. 11; CEBC Final Argument, pp. 21-22; LGI Final Argument, pdf pp. 10-11.

⁸² CSC Final Argument, p. 29.

⁸³ Charge Solar et al. Supplementary Argument, p. 3; BCSEA Final Argument, p. 2

⁸⁴ CEBC Final Argument, p. 23.

⁸⁵ BC Hydro Reply Argument, pp. 1-2.

⁸⁶ Ibid., p. 11; BC Hydro Supplementary Reply Argument, p. 7.

⁸⁷ MoveUP Final Argument, pp. 8-9; BCSEA Final Argument, p. 4; COSCO-RCIA Final Argument, p. 10.

⁸⁸ Charge Solar et al. Final Argument, pp. 9-10.

⁸⁹ Charge Solar et al. Final Argument, p. 9; CEBC Final Argument, p. 4.

resource selection is an appropriate place to provide recognition of the societal benefits stemming from solar generation.⁹⁰

Regarding whether the proposed price should allow for geographic variation to account for locational benefits, interveners' views ranged from supporting the inclusion of locational values in the proposed price, to noting a lack of evidence to help them develop an opinion on the topic.⁹¹ BCSEA, while supporting the exclusion of location benefits in the proposed price, indicates it could be open to considering locational variations as part of an assessment of the Energy Price following the evaluation report on the proposed rate schedules which BC Hydro intends to submit in 2030.⁹² In reply, BC Hydro explains that the locational value is included and represented in aggregate in the analysis done by Dunsky. BC Hydro notes that since the aggregate locational value is included, assigning a higher value to solar in certain areas would necessarily mean giving a lower value in other areas. BC Hydro contends that such a price differentiation is unjustified with respect to customer understanding and acceptance.⁹³

While some interveners support keeping the Energy Price constant until it is reviewed in five years,⁹⁴ others propose setting the Energy Price annually to reflect factors such as the declining solar PV capital cost curve, any retail import rate increases, or current competitive electricity prices in the electricity purchase agreements BC Hydro has recently signed with independent power producers.⁹⁵ The CEC also proposes fixing the Energy Price a customer would receive under RS 2289 at the prevailing Energy Price as of the service start date and for the duration of a solar PV project's lifetime, given the Energy Price uncertainty beyond 2030.⁹⁶

In reply, BC Hydro states it is opposed to annual adjustments to the Energy Price as it would introduce significant price volatility for customers. With regards to fixing the prevailing Energy Price as of the service start date over the duration of a solar PV project's lifetime, BC Hydro submits this issue does not need to be decided now and can instead be canvassed as part of the five-year evaluation. BC Hydro is, however, not opposed to this recommendation.⁹⁷

Regarding cost-shift from participants to non-participants, some interveners support the directional reduction in cost-shift.⁹⁸ Some interveners argue that cost-shifting is immaterial and overstated, and note considerable variability in the cost-shifting analysis.⁹⁹ Some interveners argue that the Dunsky Errata challenges the merits of the rate proposals or that it provides justification for deferral and/or dismissal of the proposal for RS 2289.¹⁰⁰ In reply, BC Hydro submits that Dunsky's cost-shifting forecast was not a foundational premise of BC Hydro's rate proposals, noting that in the 2024 RDA the decision to advance Net Billing was made before Dunsky prepared its cost-shifting analysis. BC Hydro maintains that it has provided comprehensive and detailed analysis that supports its rate proposals, and submits that repeating the regulatory process would not be an efficient use of resources with additional costs for ratepayers.¹⁰¹

⁹⁰ BC Hydro Final Argument, pp. 41-42.

⁹¹ CEBC Final Argument, p. 21; LGI Final Argument, pdf pp. 10-11, EcoSmart Final Argument, p. 76.

⁹² BCSEA Final Argument, p. 3.

⁹³ BC Hydro Reply Argument, pp. 14-15.

⁹⁴ COSCO-RCIA Final Argument, pp. 21-22; BCSEA Final Argument, p. 5.

⁹⁵ The CEC Final Argument, p. 31; Charge Solar et al. Final Argument, p. 12.

⁹⁶ The CEC Final Argument, p. 3.

⁹⁷ BC Hydro Reply Argument, pp. 7-8.

⁹⁸ Zone II RPG Final Argument, pp. 11, 13.

⁹⁹ Charge Solar et al. Supplementary Final Argument, pp. 3-4; CSC Final Argument, p. 33; CSC Supplementary Final Argument, p. 12

¹⁰⁰ MoveUP Supplementary Final Argument, p. 1; CSC Supplementary Final Argument, p. 12; CEBC Supplementary Final Argument, pp. 1-2; Charge Solar et al. Supplementary Final Argument, pp. 3-4.

¹⁰¹ BC Hydro Supplementary Reply Argument, p. 7.

Panel Determination

The Panel finds an Energy Price of 10 cents per kWh for Net Generation under the Self-Generation Service Rate (RS 2289) to be just and reasonable. The Panel finds 10 cents per kWh strikes an appropriate balance between reflecting BC Hydro's avoided cost and the value of solar from distributed generation facilities, providing customers with a simple and certain price that is easily understood and administered, and reducing cost-shifting towards non-participants relative to RS 1289.

The Panel agrees that the Energy Price should reflect the costs avoided by BC Hydro from Net Generation, as represented by BC Hydro's long-run marginal cost of new supply and the estimated value of solar in Dunsky's avoided cost and expanded frameworks. The Panel acknowledges that the consideration and quantification of a multitude of factors can influence the valuation of behind-the-meter solar generation, and believes that Dunsky has reasonably assessed a range of benefits for behind-the-meter solar as they relate to the BC context, provided a sound basis for the estimation of the applicable benefits, and thoroughly and reasonably explained why certain benefits either could not be estimated or were otherwise omitted in the calculation of the Energy Price. Additionally, the Panel observes that estimation of the value of solar is inherently uncertain and subject to assumptions, and the Panel sees little value in further numerical refinement of the computation of the Energy Price as proposed by some interveners, which could yield a false sense of precision.

We agree with BC Hydro that at this time, the use of multiple frameworks to calculate the Energy Price is a reasonable method for mitigating the uncertainty associated with the value of solar, particularly when there is close alignment between the results of the different frameworks. The Panel notes the 5-year average value of utility benefits under Dunsky's frameworks ranges from 9.84 cents per kWh (Dunsky's expanded/comprehensive framework in 2026) to a high of 10.04 cents per kWh (Dunsky's avoided cost framework from 2027 to 2030), and concludes that 10 cents per kWh as proposed by BC Hydro is a reasonable value for BC Hydro's avoided cost and thus the value of solar from distributed generation facilities.

The Panel notes that the Energy Price is reflective of the utility benefit from solar generation. However, the types of eligible distributed generation under RS 2289 and RS 2290 include other non-solar generation such as hydro, wind, biogas and other combination systems. Given that 99.5 percent of current net metering customers have solar generation, the Panel finds that establishing an Energy Price which is informed by the utility benefit of behind-the-meter solar adequately represents the value of Net Generation from self-generating customers at this time. The Panel further notes BC Hydro's intention to continue exploring the benefits and challenges of a time-varying add-on price for Net Generation after this proceeding concludes, and that BC Hydro could file a separate, future application to this effect.

With regards to the consideration of societal benefits, while there may be certain societal benefits associated with behind-the-meter resources, the Panel accepts BC Hydro's position that since additional uptake of behind-the-meter solar generation will generally replace the need for new utility-scale clean or renewable generation, it is appropriate for behind-the-meter generation to have a value based upon BC Hydro's cost of acquiring new resources.

However, the Panel does not foreclose the possibility that certain societal benefits could be considered as part of future reviews of the Energy Price, which may be influenced by factors including the policy context or BC Hydro's energy needs at that time. Without prescribing the scope of any future reviews, the Panel observes that a holistic consideration of societal benefits would also need to account for any societal benefits from alternative energy resources that may exceed those of behind-the-meter resources (e.g. the extent of First Nations' participation in new independent power producer projects), as well as any other incentives or compensation beyond the Energy Price that are available for behind-the-meter resources that implicitly or explicitly compensate for societal benefits.

In addition to societal benefits, the Panel notes further consideration of locational benefits and the merits of time-varying prices may be of greater relevance when there is a larger program uptake, and considers these factors to be worthy of monitoring and reporting.

The Panel also notes the resulting reduction in cost shifting towards non-participants supports BC Hydro's proposed Energy Price at 10 cents per kWh. Of the components identified as driving the cost shift, the Panel finds it appropriate that the Energy Price will effectively eliminate the cost shifting that occurs from the compensation paid to participants for Net Generation. We place significant weight on improving the fairness to non-participants, and we are not persuaded that the Energy Price is the appropriate mechanism to reduce other forms of cost-shifting arising from fixed cost and program cost recovery. In making this finding, the Panel relies on the directional change in cost-shifting rather than the total quantum of cost-shifting, in recognition that there is inherent uncertainty in the analysis due to sensitivities in the underlying assumptions, such as future uptake and generation profiles of customers. However, we view the revised cost-shifting estimates outlined in Dunsky's Errata provide further support for BC Hydro's proposals, given the lower total estimated residual cost-shift under Net Billing.

The Panel finds it reasonable for the Energy Price to be fixed until there is a review of BC Hydro's evaluation report, as this will provide a period of stability for customers while allowing the Energy Price to be revisited in the future. While it is possible that factors affecting the value of solar may change in that time, the Panel considers a requirement for more frequent updates to the Energy Price would be less predictable for participating ratepayers. The Panel discusses items to be addressed in the future evaluation report in Section 5.0 of this decision.

2.4 Change from Project Size Limit to Net Injection Limit

Customers' generating facilities under RS 1289 are currently subject to an installed capacity limit of 100 kW. For RS 2289, BC Hydro proposes to remove the installed capacity limit and instead replace it with a limit on the total power flow that can be injected into the grid, of 100 kW per phase after serving the customer's load. Customers with three-phase systems could inject up to a total of 300 kW into the grid.¹⁰²

BC Hydro indicates the proposed change to use a net injection limit responds to customer feedback that the existing 100 kW nameplate capacity is too restrictive. This change allows larger customers¹⁰³ to potentially meet a larger part or all of their load; does not create any substantial development and implementation costs for BC Hydro; keeps interconnection safe and simple; and provides greater flexibility to update the net injection limit in the future.¹⁰⁴

Mr. Lipson, one of CSC's experts, recommends the net injection limit for RS 2289 be the maximum continuous power capacity of the utility service for each customer. This allows larger generation systems for larger customers while reducing the size of permitted systems for smaller customers. In addition, Mr. Lipson recommends that if RS 1289 remains available at the conclusion of this proceeding, that its system size limit be modified as per the recommendation made for RS 2289.¹⁰⁵

In its rebuttal evidence, BC Hydro agrees that there are circumstances where a higher net injection limit may be technically feasible without triggering a need for distribution system upgrades. However, BC Hydro clarifies that the purpose of its proposed cap is to meet the needs of the vast majority of customers – rather than all customer circumstances – while effectively managing the complexity, cost and timelines of reviewing and

¹⁰² Exhibit B-1, p. 5-7.

¹⁰³ Particularly Medium General Service and Large General Service customers.

¹⁰⁴ Exhibit B-1, pp. 5-8 to 5-9.

¹⁰⁵ Exhibit C10-20, p. 2.

accepting self-generation interconnection applications. BC Hydro adds that its cap implies that the scope of the study and potential upgrades is generally limited to the secondary system and distribution transformers, avoiding upgrades to the distribution primary system and upstream substation and transmission equipment.¹⁰⁶

Positions of the Parties

Some interveners who generally support BC Hydro's overall rate proposals also support BC Hydro's proposed net injection limit to RS 2289 customers. Their perspectives include: the proposal provides more flexibility to the self-generation system sizing compared to RS 1289, allows for customers to self-supply a bigger portion of their onsite needs, is technically reasonable and economically rational, avoids inefficient transmission and distribution system upgrades, and provides additional energy to BC Hydro while mitigating the risks to BC Hydro's ratepayers associated with system upgrades.¹⁰⁷

BCSEA requests that the Panel be cautious about Mr. Lipson's alternative recommendations as BC Hydro's proposal is easier to understand by third parties and it would be premature to complicate – and potentially dramatically increase – the limits on generation size before consideration of the five-year evaluation of actual experience with the new rate.¹⁰⁸

CSC's position on net injection limits applies both to RS 2289 and RS 2290. CSC submits that it is more appropriate to apply individual net injection limits based on technical constraints at each customer's site: specifically, the maximum continuous power capacity of the utility service for each customer. In addition, CSC notes customers can choose whether to proceed with system impact studies when presented with initial study cost estimates and a summary of the known size thresholds that would trigger higher study costs for their location. From CSC's perspective, BC Hydro's proposed limits prevent access to economies of scale and lower-cost electricity, and do not have an economic or cost of service basis.¹⁰⁹

Panel Determination

The Panel finds a net injection limit of 100 kW per phase after serving the customer's load for RS 2289 to be reasonable, because it provides more flexibility to self-generation customers to address a larger part of their own load while allowing the utility to manage its interconnection process and technical needs in a practical fashion and without incurring significant costs.

While we acknowledge the technical limit to self-generation could be higher for some customers, the Panel is satisfied that BC Hydro's proposal represents an improvement with respect to RS 1289 in alignment with input received by the utility from its engagement process, and appears to address the needs of the vast majority of customers while minimizing the cost and complexity of the interconnection studies and potential system upgrades.

Further, the Panel finds no need to modify the facility size constraints in RS 1289 in alignment with the new requirements in RS 2289. RS 1289 customers were aware of the conditions applicable to that rate at the time they signed up and could plan their investments accordingly.

¹⁰⁶ Exhibit B-24, p. 37; Cover Letter pp. 2-3.

¹⁰⁷ BCSEA Final Argument p. 3; CEC Final Argument pp. 1-2; MoveUP Final Argument p. 1, COSCO-RCIA Final Argument pp. 23-24.

¹⁰⁸ BCSEA Final Argument p. 16.

¹⁰⁹ CSC Final Argument pp. 16, 19, 20, 30.

2.5 Potential Impacts of BC Hydro’s Proposal on Self-Generation Uptake

BC Hydro uses analysis by Dunsky to inform its proposals in this Application. Dunsky used an illustrative version of the Self-Generation Service Rate and a BC Hydro Solar Rebate to forecast an increase in behind-the-meter generation to a total of 1,750 GWh by 2043, which is approximately 750 GWh more than the currently approved net metering program. This accumulative increase can be broken down as follows:¹¹⁰

- Approximately 330 GWh from increased self-generation under the proposed RS 2289;
- Approximately 40 GWh from BC Hydro’s proposed changes to the capacity limit under RS 2289 compared to RS 1289; and
- Approximately 400 GWh from BC Hydro’s proposed Community Generation Service Rate.

BC Hydro states its intent with the Application is to promote the development of fair and not unduly discriminatory proposals that ensure balanced and sustainable growth for all customers. BC Hydro clarifies that maximizing potential injection into the system was not a design objective in the development of the proposals in the Application.¹¹¹

Positions of the Parties

CEBC and Charge Solar et al. state that the proposal on Self-Generation would adversely affect the solar market and would detrimentally impact the uptake of behind-the meter generation.¹¹² CEBC is of the view that the analysis regarding the impact of the proposed Energy Price on the continued adoption of solar technologies has been inadequate.¹¹³ Charge Solar et al. argue that by assuming self-generation will continue to grow “unabated,” BC Hydro fails to consider the negative market impact its proposal will have.¹¹⁴ Conversely, BCSEA states that the proposed Energy Price is reasonable and appropriate and would foster new participation.¹¹⁵

The CEC and CSC raise concerns that the market potential is reliant on the continuation of rebates.¹¹⁶ CSC argues that empirical evidence from relevant jurisdictions with similar low penetration of solar shows that Net Billing would suppress the uptake of solar generation in BC.¹¹⁷

Panel Discussion

The Panel acknowledges that several interveners and letters of comment have addressed potential concerns around the impact of BC Hydro’s proposals for self-generation upon the continued growth in BC’s solar generation sector. However, the Panel finds that such impacts are not determinative for this proceeding, as outlined below.

The Panel does not dispute that, all else being equal, a reduction in the compensation for Net Generation will disincentivize future uptake of behind-the-meter generation by lengthening the payback period. However, the estimated payback period should not be a factor for the determination of the Energy Price, but rather an outcome.¹¹⁸ To the extent that RS 2289 provides appropriate price signals for customer investments in behind-

¹¹⁰ Exhibit B-8, pp. 6-7.

¹¹¹ BC Hydro Final Argument, p. 9.

¹¹² CEBC Final Argument p. 1; Charge Solar et al. Final Argument, p. 6.

¹¹³ CEBC Final Argument, p. 4.

¹¹⁴ Charge Solar et al. Final Argument, p. 6.

¹¹⁵ BCSEA Final Argument, p. 4.

¹¹⁶ The CEC Final Argument, p. 11; CSC Final Argument, p. 3.

¹¹⁷ CSC Final Argument, p. 11.

¹¹⁸ Exhibit B-15, MoveUP IR 1.1.5

the-meter resources, the customer is free to decide whether to proceed with an investment and participate in RS 2289, which is an optional rate offering. The Panel also considers that it would be inappropriate for the new rate to be designed so that the economic impact of the rate is the same among potential customers, and further observes that some net metering customers will make investment decisions for reasons other than economic payback.¹¹⁹ For these reasons, the Panel finds that the Energy Price does not introduce any fairness issues for potential new customers of RS 2289 from the perspective of the payback period.

Additionally, BC Hydro has stated it does not have a net metering procurement target,¹²⁰ and there is no provincial policy that provides any targets or prioritization of behind-the-meter generation and storage over other clean and renewable resources. Therefore, the primary impact of lower-than-expected uptake of behind-the-meter resources is that BC Hydro will need to acquire other clean or renewable resources.¹²¹ On this basis, the Panel finds no compelling reason for the compensation of Net Generation to be calibrated to explicitly promote any particular level of uptake of distributed energy resources.

Regardless of these findings, the Panel observes that the net metering service rates are not the only mechanism to address potential barriers to uptake of behind-the-meter resources going forward. While outside the scope of this proceeding, an important example is BC Hydro's rebates for customer solar and battery projects. To the extent that BC Hydro wishes to actively promote increased levels of Net Generation, the Panel believes it is more appropriate that BC Hydro address these matters through mechanisms such as future rebate offerings and the Integrated Resource Planning process, rather than distorting the Energy Price to seek a particular payback period or level of uptake.

2.6 Should BC Hydro's Proposed Transition Mechanism from Rate Schedule 1289 to Rate Schedule 2289 be Accepted?

BC Hydro introduced five alternative proposals to transition existing customers from RS 1289 to RS 2289, which are described below, including the respective revenue impact compared to a "no transition" alternative.¹²²

1. **No Transition:** This option would immediately transition all RS 1289 customers to RS 2289 on April 1, 2026;
2. **Average Residential Payback Period from RS 2289 Effective Date:** This option ties the transition period to the average payback period for residential installations. The transition period is 20 years from April 1, 2026, for all customers. The revenue impact is \$51 million;
3. **Average Residential Payback Period from the Net Metering Service Start Date (proposed by BC Hydro):** This option ties the transition period to the average payback period for residential installations and starts from the customer's net metering service start date, providing an account-specific transition period. The revenue impact is \$41 million;
4. **Residential E-Plus Rate Transition Period:** This option applies the transition period that BC Hydro used in accordance with the BCUC's decision to phase out the Residential E-Plus Rate.¹²³ The transition period is ten years from April 1, 2026. The revenue impact is \$18 million; and

¹¹⁹ For example: the ability to generate clean electricity and a desire for more energy self-sufficiency. Exhibit B-1-1, Appendix D-2A, p. 6

¹²⁰ Exhibit B-13, BCUC IR 1.14.6

¹²¹ Exhibit B-15, CSC IR 1.1.8

¹²² Exhibit B-8, p. 30, Exhibit B-8-1, pp. 31-32; Exhibit B-13, BCUC 1.15.1.

¹²³ Order G-5-17 ordered a 5-year phase-out, while Order [G-194-17](#), a reconsideration order, changed the phase-out period to 10 years.

5. **FortisBC Residential Conservation Rate Transition Period:** This option applies the transition period used by FortisBC for its Residential Conservation Rate.¹²⁴ The transition period would be five years from April 1, 2026. The revenue impact is \$7 million.

BC Hydro's selected option (3) considers existing Net Metering customers' concerns about the impact of BC Hydro's proposal on their ability to recover the initial investment in their generating facility and applies only to customers that have not received a BC Hydro solar rebate for their generating facility.¹²⁵

In addition to the transition mechanism previously described, BC Hydro makes proposals to address some specific circumstances, which are described below:¹²⁶

- Customers who received a solar rebate: In July 2024, BC Hydro started offering solar rebates as part of its Demand Side Measures programs. BC Hydro's solar rebate terms and conditions included that customers that received a rebate must transition from RS 1289 to RS 2289. In response to concerns from existing net metering customers regarding this condition, BC Hydro states it will offer customers who received the solar rebate a one-time opportunity to opt out (i.e., to repay the solar rebate to BC Hydro with an optional payment plan) and stay on RS 1289 for the proposed transition period;
- Expansion of existing facilities under RS 1289 prior to RS 2289 effective date: The transition period for the customer will be calculated based on the weighted average of the customer's original and expanded generating facility sizes;
- Expansion of existing facilities under RS 1289 after RS 2289 effective date: These customers will have a transition period of 20 years from when they started taking service under RS 1289 for their first installation. These customers can make an informed investment decision about expanding their system based on the approved new rates and, therefore, will not have a transition period with a weighted average calculation; and
- Customers who move into premises with an existing Generating Facility: Customers who move into premises with an existing Generating Facility after April 1, 2026, will not be eligible for BC Hydro's proposed RS 1289 transition period. They will need to take service under RS 2289.

In addition, BC Hydro states that a customer (i.e., an account) cannot be under both RS 1289 and RS 2289 at the same time because it is cost prohibitive to develop a partial billing solution for a small number of customers who wish to be served under both rate schedules.¹²⁷

Positions of the Parties

The CEC supports BC Hydro's proposed transition for existing RS 1289 customers on the basis that 20 years would allow RS 1289 customers to be held 'whole'.¹²⁸ BCSEA would support BC Hydro's transition proposals if RS 2289 proceeds.¹²⁹

COSCO-RCIA disagree with BC Hydro's claim that its transition proposal strikes an appropriate balance between the interests of existing Net Metering customers and the interests of other ratepayers. COSCO-RCIA submit that the purpose of any transition is to mitigate, not eliminate, the impact of justified changes on existing customers. They add that BC Hydro's proposals intend to improve a rate design and reduce the cost-shifting from RS 1289;

¹²⁴ Order G-197-19 dated August 23, 2019.

¹²⁵ Exhibit B-8, p. 30; Exhibit B-35, BC Hydro Undertaking 3.

¹²⁶ Exhibit B-3, BCUC IR 1.10.1; Exhibit B-13, BCUC IR 1.15.3; Exhibit B-35, BC Hydro Undertaking 3, Attachment 2.

¹²⁷ Exhibit B-13, BCUC IR 1.15.3.

¹²⁸ The CEC Final Argument, pp. 37-38.

¹²⁹ BCSEA Final Argument, pp. 4-6.

therefore, the proposals are justified on their own merit and there is no requirement to hold existing customers whole.¹³⁰ COSCO-RCIA recommend shortening the transition period to 10-12 years based on transition periods previously approved by the BCUC.¹³¹

CSC submits that the transition period should start on the effective date of a new net billing rate; otherwise it would be unfair to early adopters.¹³² In addition, CSC proposes the transition period should be attached to the service address and not the identity of the occupant of that address, because otherwise ordinary life events such as death, inheritance, or intra-family transfer would materially impair the residual value of those legacy energy systems without any change in system impact or cost causation.¹³³

In reply to CSC, BC Hydro considers that these arguments misunderstand the purpose of the transition period, which is to protect the payback for the customer who made the investment. On the first point raised by CSC, starting the transition period from the date of rate change would provide early adopters far more transition than needed to realize their expected payback under the status quo. On the second point raised by CSC, BC Hydro notes that it is the customer—not the property—that made the investment.¹³⁴

Zone II RPG submits that the existing RS 1289 customers in the non-integrated areas (NIA) who did not receive the solar rebate should be allowed a longer transition period to align with the higher payback and higher investments required to implement self-generation in NIAs.¹³⁵

In reply, BC Hydro states that it considers a NIA-specific transition period is not appropriate because the intent of the transition period is not to address any inequities between NIA and net metering customers, but to address the impacts of the move from RS 1289 to RS 2289. A NIA-specific transition period would not be needed to achieve this objective.¹³⁶

Panel Determination

The Panel finds a 10-year transition period from the customer’s Net Metering Service Start Date reasonable for RS 1289 customers who did not receive a solar rebate, on the basis that it balances the reduction of cost-shifting from non-participants with the investment decisions of existing RS 1289 customers.

The Panel acknowledges that RS 1289 customers made investments in generating facilities under terms that are different than those proposed for RS 2289, particularly the compensation mechanism, and may be negatively impacted by the new rate schedule.

On the one hand, some RS 1289 customers who did not receive BC Hydro’s solar rebates would be significantly impacted by the changes introduced in RS 2289 without a transition period, in particular customers who signed up more recently. On the other hand, a longer transition period will have a higher cost impact that will be absorbed by all ratepayers, i.e. it will increase the cost-shift between participating and non-participating customers. Further, as has happened with RS 1289 during the past two decades, it is reasonable to expect that terms and conditions for RS 2289 will be reviewed periodically to address future opportunities and challenges.

¹³⁰ COSCO-RCIA Final Argument, p. 27.

¹³¹ Ibid., p. 29.

¹³² CSC Final Argument, p. 25.

¹³³ Ibid., p. 24.

¹³⁴ BC Hydro Reply Argument, p. 25.

¹³⁵ Zone II RPG Final Argument, p. 10.

¹³⁶ BC Hydro Reply Argument, p. 4.

The Panel notes that rate schedules are subject to change. The purpose of a transition period is to alleviate the impacts of changes to ratepayers, and there is no requirement that transitions keep individual customers whole. We also note BC Hydro acknowledges that the proposed transition period is beyond what BC Hydro has proposed in other rate design proceedings.¹³⁷

BC Hydro's 20-year transition period is intended to allow an average customer to recover their investment, to keep them whole, and is expected to have a revenue impact of \$41 million. A 10-year transition period from the Net Metering Service Start Date would result in a revenue impact of less than half of BC Hydro's proposal, under \$18 million.¹³⁸ The Panel finds that a 10-year transition period strikes a fair balance between an immediate change to RS 2289 and a delayed implementation of RS 2289 for net metering customers that signed up in more recent years. The Panel considers the cost-shift associated with the transition results in a reasonable amount to be absorbed by all ratepayers.

The Panel finds it is appropriate that customers who move into premises with an existing generating facility are not eligible for the transition period. As previously mentioned, the purpose of a transition is to mitigate the negative impact from changes from RS 1289 to RS 2289 on customers who made the investment in the energy system.

The Panel finds that an NIA-specific transition period is not required. The Panel notes that the purpose of the transition is to reduce the negative impacts of customers transitioning to RS 2289 and it is not intended to address differences between customers in different circumstances, such as customers in NIAs compared to those in the integrated system.

Finally, the **Panel finds reasonable BC Hydro's proposed approach that (i) customers who expand their existing facilities under RS 1289 before the RS 2289 effective date will be subject to a transition period based on the weighted average of the customer's original and expanded generating facility sizes; and (ii) customers who expand facilities after the RS 2289 effective date will not be subject to a weighted transition period.** BC Hydro's proposed approach mitigates the effect of the changes in rate schedules for customers that expanded their facilities, who would have not been able to consider the impact of the changes when they made an investment decision. Additionally, we agree that it would be onerous for BC Hydro to have one customer with two partial billing systems.

2.7 Was BC Hydro's Engagement Process Appropriate?

This section includes information on stakeholder and First Nations engagement for the rate schedules addressed in this proceeding: RS 1289, RS 2289 and RS 2290.

BC Hydro conducted a year of engagement with customers and stakeholders specific to net metering rate schedules before the filing of the 2024 RDA, which included:

- surveys;¹³⁹
- activities of a net metering working group (Working Group) of approximately 20 advocacy groups (such as solar advocacy, customers, suppliers and interested participants). BC Hydro funded the participation of a consultant to one of the advocacy groups to help inform the discussions;¹⁴⁰

¹³⁷ Oral Hearing Revised Transcript Volume 1, November 17, 2025, p. 229.

¹³⁸ The transition option based on the Residential E-Plus Rate considered a 10-year transition starting April 1, 2026, for all existing customers and had an estimated revenue impact of \$18 million (Exhibit B-8-1, pp. 31-32). A transition option of 10 years from the Net Metering Service Start Date should result in a lower revenue impact.

¹³⁹ Exhibit B-1-1, p. 3-25.

¹⁴⁰ Ibid., pp. 3-33 to 3-35, 3-38.

- two workshop sessions for stakeholders;¹⁴¹ and
- sessions with NIA First Nations, customers and stakeholders.¹⁴²

The Evidentiary Update and the Dunskey Value and Cost-Shifting Report were informed by feedback provided through the Working Group and the First Nations Energy and Mining Council.¹⁴³

To inform the Dunskey Value and Cost-Shifting Report, the Working Group was expanded in August 2024. Table 2 below includes a list of members. BC Hydro states that it participated in the Working Group as a stakeholder in line with a commitment made in the 2024 RDA to fund an independent third-party to assist with work to inform an Energy Price for RS 2289 and RS 2290. The feedback from the Working Group was considered by Dunskey and summarized in its report.¹⁴⁴

Table 2: Members of the Net Metering Working Group (as of August 2024)¹⁴⁵

AES Engineering	EcoSmart
All Island Protocol Table	FortisBC
BC Community Solar Coalition	Haiki Energy
BC Sustainable Energy Association	High Tide Energy
Charge Solar	Integral Energy Consulting
City of Richmond	Metro Vancouver
City of Vancouver	Residential Consumers Interveners Association
City of Victoria	Riverside Energy
Commercial Energy Consumers Association	Shift Energy Group
Community Economic Development Advisory Commission	Vancouver Electric Coop
District of North Vancouver	Zone II Ratepayers Group

BC Hydro’s engagement with the First Nations Energy and Mining Council sought feedback on the Dunskey Value and Cost-Shifting Report and on how to encourage First Nations participation in RS 2290.¹⁴⁶

Positions of the Parties

BCSEA submits that BC Hydro’s stakeholder engagement was extensive and adequate in regulatory terms.¹⁴⁷ Some interveners consider that public engagement was limited and/or insufficient. Some of these parties base their position on BC Hydro’s need to revise its rate proposals during the proceeding, the dynamic within the Working Group and the consideration of market information in the proceeding.¹⁴⁸ Some interveners find the First Nations engagement was limited and/or insufficient.¹⁴⁹

In reply, BC Hydro submits there was substantive, meaningful engagement with a range of stakeholders on the issues in this proceeding. It adds that interveners’ participation in the proceeding itself was a continued form of

¹⁴¹ Ibid., p. 3-39.

¹⁴² Ibid., p. 3-42.

¹⁴³ Exhibit B-8, p. 17.

¹⁴⁴ Ibid., pp. 17-19.

¹⁴⁵ Ibid., p. 18.

¹⁴⁶ Exhibit B-8, p. 19.

¹⁴⁷ BCSEA Final Argument, p. 8.

¹⁴⁸ CSC Final Argument, pp. 5-6; Charge Solar et al. Final Argument, p. 5; CEBC Final Argument, p. 22.

¹⁴⁹ CEBC Final Argument, p. 22; EcoSmart Final Argument, p. 12.

engagement which offered substantive opportunities for different forms of engagement. Further, BC Hydro poses that refinements made to its rate proposals during the proceeding demonstrate how interveners were able to impactfully engage on issues.¹⁵⁰

Panel Determination

The Panel finds the engagement process for the proceeding was extensive and adequate. The record demonstrates that BC Hydro engaged extensively through different processes, with a wide array of parties, before and during the proceeding. The engagement process included a Working Group, in which BC Hydro funded the consultant of one of the advocacy groups, and a process with an independent third party to inform an Energy Price for the proposed rate schedules. It is clear from the evidentiary record that BC Hydro solicited a range of divergent views and feedback in advance of the filing of its Application, and the Panel notes that there is no requirement for BC Hydro’s engagement process to have achieved consensus.

2.8 Overall Determination on Rate Schedules 1289 and 2289

Based on the foregoing reasons, the Panel determines that it is just and reasonable to establish a new Self-Generation Service Rate, RS 2289, as proposed by BC Hydro, and to close the Net Metering Service Rate, RS 1289, to new customers subject to a 10-year transition period as outlined in Section 2.6.

Pursuant to sections 59 to 61 of the UCA, **the Panel makes the following determinations regarding RS 2289 and RS 1289:**

- 1. RS 2289, as shown in Exhibit B-35, BC Hydro Undertaking 3, Attachment 2, is approved effective July 1, 2026.**
- 2. RS 1289 is closed to new customers effective July 1, 2026.**
- 3. Amendments to RS 1289, as shown in Exhibit B-35, BC Hydro Undertaking 3, Attachment 2, are approved effective July 1, 2026, with the following adjustments:**
 - a. Under “Termination of Service”, bullet 5, March 31, 2046 is to be replaced with June 30, 2036;**
 - b. Under “Transition Period”, 20 years is to be replaced with 10 years;**
 - c. All references to April 1, 2026 are to be replaced with July 1, 2026; and**
 - d. All references to March 31, 2026 are to be replaced with June 30, 2026.**

The Panel notes that, although BC Hydro originally sought an effective date of April 1, 2026 for RS 2289,¹⁵¹ BC Hydro subsequently indicated that it was amenable to a later effective date.¹⁵² The Panel approves an effective date of July 1, 2026 for RS 2289, to allow sufficient time for implementation following the issuance of this decision.

¹⁵⁰ BC Hydro Reply Argument, pp. 15-16.

¹⁵¹ Exhibit B-35, BC Hydro Undertaking 3, Attachment 2.

¹⁵² Exhibit B-27, p.1; BC Hydro Reply Argument, Cover Letter, page 1, footnote 1.

3.0 Community Generation Service Rate (Rate Schedule 2290)

3.1 Introduction

In its June 2020 decision on BC Hydro's April 2019 Application to amend RS 1289,¹⁵³ the BCUC encouraged BC Hydro to explore how "virtual net metering" could be achieved, and to consult with and receive feedback from affected parties. The BCUC also directed BC Hydro to include this feedback in BC Hydro's fifth Net Metering evaluation report, filed on October 2020 in accordance with BCUC Order. G-168-20.¹⁵⁴

BC Hydro's proposed new Community Generation Service Rate, RS 2290, will allow multiple customers who may otherwise be unable to install generating facilities, such as renters or strata residents, to share the benefits of a single shared generating facility (Shared Generating Facility). The rate is intended to allow a group of customers to share compensation for Net Generation from a Shared Generating Facility as benefitting customers (Benefitting Customers), although they may not be physically connected to the generating facility. The rate is not, however, intended to provide an alternative way for independent power producers to sell energy to BC Hydro.¹⁵⁵ BC Hydro states that RS 2290 would provide higher compensation to independent power producers than would otherwise be available through an electricity purchase agreement with BC Hydro; which would have a negative impact on BC Hydro ratepayers.¹⁵⁶

For the purposes of this rate schedule, BC Hydro's customer is the Community Generator, the owner/operator of the Shared Generating Facility. The Community Generator has commercial arrangements with eligible Benefitting Customers, who are also BC Hydro customers.¹⁵⁷

BC Hydro anticipates two broad types of operating models within RS 2290.¹⁵⁸

1. Shared generating facilities with significant on-site load, such as where the Community Generator is a strata corporation with extensive common property. The generation of this type of facility would primarily offset the Community Generator's own load and there might not be any Net Generation delivered to the BC Hydro system; and
2. Shared generating facilities with minimal on-site load, such as a solar facility in a field. The generation of this type of facility would primarily and consistently be delivered to the BC Hydro system.

Panel Discussion

To provide context for the Panel's review of section 3, it is important to note that neither the BCUC nor the BC Government has introduced any direction, legislation or policy specifying the implementation or design of a community generation or a virtual net metering program. This contrasts with the experience of other jurisdictions which have been referenced in this proceeding. Ecosmart, for example, acknowledges that none of the U.S. jurisdictions it examined in preparation of its intervenor evidence implemented community solar programs without legislative or regulatory mandates.¹⁵⁹ As such, the Panel's review of BC Hydro's new RS 2290 does not place significant weight on the program designs that exist elsewhere, and RS 2290 is evaluated on its merits in consideration of the circumstances and legislation that exist in BC.

¹⁵³ Decision and Order [G-168-20](#) dated June 23, 2020.

¹⁵⁴ Exhibit B-1, p. 5-13.

¹⁵⁵ Ibid.

¹⁵⁶ Exhibit B-3, BCUC IR 1.7.2.

¹⁵⁷ Exhibit B-1, p. 5-18, Exhibit B-35, BC Hydro Undertaking 3, Attachment 2.

¹⁵⁸ Exhibit B-1, p. 5-17.

¹⁵⁹ Exhibit C1-14, BCUC IR 6.1.

3.2 Should the Same Compensation Mechanism and Energy Price Apply to Rate Schedule 2290 as Rate Schedule 2289?

BC Hydro's proposal for RS 2290 is a net billing compensation mechanism in which the credit for Net Generation from a Community Generator is credited to that Community Generator's account. Benefitting Customers would then receive financial compensation based on their allocated share of the value of the Net Generation from the Shared Generating Facility, as set out in the arrangement between the Benefitting Customers and the Community Generator.¹⁶⁰

BC Hydro is proposing the same Energy Price under RS 2290 as proposed for RS 2289, which is an Energy Price of 10 cents per kWh for all Net Generation, to be reviewed in five years.¹⁶¹ BC Hydro explains it is reasonable for both RS 2289 and RS 2290 to have the same Energy Price because the Energy Price for Net Generation is intended to reflect the utility benefits of Net Generation to BC Hydro. BC Hydro notes that while economies of scale may exist for Community Generation, the utility benefits of Net Generation are the same. BC Hydro clarifies that the Energy Price for Net Generation is not intended to reflect the cost of that generation to RS 2289 or RS 2290 customers; and that RS 2290 is not intended to comprehensively address all potential barriers to customer participation in self-generation.¹⁶²

Positions of the Parties

Some interveners support BC Hydro's proposed compensation mechanism on the basis that Net Billing provides a compensation of Net Generation that is fair, not unduly discriminatory, and enables growth in a way that is balanced and sustainable for all customers. In addition, customers' compensation is not based on the structure of customers' retail rates.¹⁶³

Other interveners consider RS 2290 has structural challenges and recommend the rate schedule go through a new review process.¹⁶⁴ These interveners raise the following concerns:¹⁶⁵

1. Benefitting Customers do not have the same opportunity as RS 2289 customers in terms of compensation because Benefitting Customers cannot offset coincident energy production at the retail rate; and
2. Some Shared Generating Facilities may have on-site load and others may not. The compensation mechanism creates an unlevel playing field among these facilities in which those with on-site load receive a better compensation.

The CEC proposes the BCUC direct BC Hydro to adopt a buy all – sell all mechanism¹⁶⁶ for RS 2290. The CEC considers this change would alleviate BC Hydro's concern about independent power producers' participation in RS 2290 and reduce cost-shifting.¹⁶⁷

¹⁶⁰ Exhibit B-1, p. 5-18.

¹⁶¹ Exhibit B-8, p. 34.

¹⁶² Exhibit B-15, EcoSmart IR 1.1.4.

¹⁶³ MoveUP Final Argument, pp. 1-2, BCSEA Final Argument, pp. 2-3, 9-10; Cosco-RCIA Final Argument, p. 30.

¹⁶⁴ EcoSmart Final Argument, p. 2; CSC Final Argument, p. 28, LGI Final Argument, pdf p. 4.

¹⁶⁵ LGI Final Argument, pdf p. 5, EcoSmart Final Argument, pp. 6- 8; CSC Final Argument, pp. 2, 25, 26; CEC Final Argument, pp. 4, 53-54.

¹⁶⁶ In a "buy all- sell all" compensation mechanism customers pay for their gross consumption at the retail rate and are compensated for all their generation at the Energy Price (see Exhibit B-1, p. 5-22).

¹⁶⁷ The CEC Final Argument, pp. 4, 53-54.

In reply, BC Hydro submits that its proposal is fair and appropriate for introduction at this time. While facilities without onsite load can participate in RS 2290, BC Hydro's rate design is not focused on them.¹⁶⁸ With respect to the compensation mechanism itself, BC Hydro acknowledges that customers in RS 2289 can offset their consumption at a retail rate while Benefitting Customers cannot. However, BC Hydro submits RS 2290 is not intended to provide Benefitting Customers with an equivalent economic return compared to customers participating in RS 1289 or RS 2289. Further, the approaches to eliminate such a difference would require changes to the compensation mechanism that would either not be appropriate or would overcompensate customers.¹⁶⁹

Regarding CEC's recommendation to use a buy all-sell all mechanism, BC Hydro replies that it disagrees this approach will address its concerns regarding independent power producers, as the concern that independent power producers could get a better price through community generation stems from the lack of a competitive process to set community generation pricing, which remains regardless of whether the compensation mechanism is Net Billing or buy all-sell all.¹⁷⁰

Panel Determination

The Panel finds the use of the same net billing mechanism and the same Energy Price for Net Generation for both RS 2289 and RS 2290 to be reasonable.

As discussed in Sections 2.2, 2.3 and 2.5, the compensation mechanism and Energy Price are intended to provide a fair compensation for Net Generation at a value that reflects the utility benefit of that energy. The Panel sees no difference in the Net Generation from RS 2289 and RS 2290 from a utility benefit perspective, and therefore it is reasonable that the same compensation mechanism and Energy Price apply to both RS 2289 and RS 2290.

We acknowledge concerns expressed by some parties regarding the differences in overall compensation to Benefitting Customers and RS 2289 customers, and between Community Generators with or without onsite load. However, similar to the discussion in Section 2.2, changes in compensation to address such concerns would require that participants in RS 2290 be subsidized by non-participants, which the Panel finds would be unfair. Additionally, the Panel does not consider a comparison of the potential economic return for customers of RS 2289 and 2290 to be an appropriate measure of fairness, as they are two distinct rate schedules with different eligibility requirements. Notwithstanding this point, we observe that the introduction of RS 2290 would improve overall equity compared to the current circumstances, as it provides an additional potential opportunity for customers who are unable to participate in RS 1289. Finally, consistent with our discussion in Section 2.5, RS 2290 is an optional rate schedule and it is the customer's decision whether to participate, and it would not be fair to incentivize uptake of the program at the expense of other ratepayers.

3.3 Is the 1 MW Net Injection Limit Reasonable?

Under RS 2290 as proposed, Shared Generating Facilities must comply with the following eligibility criteria:¹⁷¹

1. Must be constructed after the tariff takes effect, and the Community Generator must be a BC Hydro customer taking service under an eligible Residential or General Service rate.
2. Have a maximum permitted net injection limit of up to 1 MW (Community Net Injection Limit). However, each Shared Generating Facility's maximum net injection limit will be determined by allocating 24 kW for each Residential Benefitting Customer and 100 kW for each General Service Benefitting Customer. For example, a Shared Generating Facility with ten Residential Benefitting Customers would

¹⁶⁸ BC Hydro Reply Argument, p. 18.

¹⁶⁹ Ibid., pp. 20-21.

¹⁷⁰ BC Hydro Reply Argument, p. 9.

¹⁷¹ Exhibit B-1, pp. 5-14 to 5-15.

have a net injection limit of 240 kW (24 kW X 10 customers) while a Shared Generating Facility with 100 Residential Benefitting Customers could be sized up to the maximum net injection limit of 1 MW.

In addition to the Community Net Injection Limit, BC Hydro established limits to the allocation of benefits to Benefitting Customers (Maximum Customer Allocation). A Benefitting Customer's allocation of benefits from any Community Generating Account Balance may not exceed: 50 percent if the Shared Generating Facility has four or fewer Benefitting Customer accounts; 25 percent if the Shared Generating Facility has between 5 and 9 Benefitting Customer accounts; or, 10 percent if the Shared Generating Facility has ten or more Benefitting Customer accounts.¹⁷² Benefitting Customers are limited to participating in one Shared Generating Facility at a time and cannot be taking service under RS 1289 or RS 2289.¹⁷³

BC Hydro states that the 1 MW Community Net Injection limit, the Shared Generating Facilities net injection limit and the Maximum Customer Allocation, are intended to encourage community-based generation for customers to offset their energy charges and discourage independent power producers from participating in this rate.¹⁷⁴ BC Hydro acknowledges that while the Shared Generating Facilities net injection limit and the Maximum Customer Allocation are necessary to ensure the community-based intent of the rate, the 1 MW Community Net Injection limit is also intended to manage the overall volume of energy that BC Hydro obtains through RS 2290. Further, BC Hydro recognizes that the 1 MW Community Net Injection limit is a policy choice and that it could have selected a higher limit.¹⁷⁵

In addition, BC Hydro notes the technical benefit of a 1 MW Community Net Injection limit which aligns with BC Hydro's screening study methodology, which for any injection up to 1 MW that passes a series of technical screens, the study and upgrades can be limited to the distribution system. For an injection of more than 1 MW, the scope and complexity of the study increase to include the transmission system, substations, protection and control, supervisory control and data acquisition, and revenue metering. These studies are more complex, take longer, and the cost of the system upgrades required often make small projects financially unfeasible.¹⁷⁶ Interconnection studies and incremental interconnection costs for facilities with a capacity greater than 50 kW are borne by the interested parties.¹⁷⁷

Regarding the overall conditions applicable to RS 2290, while Dunsky's analysis indicates there are steps BC Hydro could take to further enable community solar, BC Hydro believes such steps should be supported by an identified need for increased energy supply from distributed energy resources. BC Hydro submits that the appropriateness of these further steps is best considered as part of future long-term resource plans.¹⁷⁸

Positions of the Parties

Interveners provided diverse positions about the proposed 1 MW Community Net Injection Limit, the additional eligibility requirements that limit the net injection limit of individual community generating facilities based on the number of Benefitting Customers, and the allocation of benefits among Benefitting Customers.

Some interveners support BC Hydro's proposal of a 1 MW net injection limit for RS 2290 for its technical benefits and because it allows the management of the risk of independent power producers' participation. Some parties

¹⁷² Exhibit B-35, BC Hydro Undertaking 3, Attachment 2.

¹⁷³ Exhibit B-3, BCUC IR 1.8.2; Exhibit B-35, BC Hydro Undertaking 3, Attachment 2.

¹⁷⁴ Exhibit B-1, p. 5-15; Exhibit B-3, BCUC IR 1.7.2.

¹⁷⁵ Oral Hearing Revised Transcript Volume 1, November 17, 2025, p. 72; Oral Hearing Revised Transcript Volume 2, November 18, 2025, pp. 27-28.

¹⁷⁶ Exhibit B-3, BCUC IR 1.5.1.

¹⁷⁷ Exhibit B-1, pp. 5-10 to 5-11; Exhibit B-8, Appendix A-1, Terms and Conditions, Section 9, pp. 12-13.

¹⁷⁸ Exhibit B-8, p. 39.

also find the combination of the Community Net Injection Limit with the additional eligibility requirements supports the goals of expanding access to the net metering program as well as the need for fairness, cost containment, and ratepayer protection. Some interveners also note that BC Hydro acknowledged it will be monitoring the interest and feedback in RS 2290 and may make upward adjustments if warranted.¹⁷⁹

BCSEA supports the 1 MW Community Net Injection Limit but opposes a series of conditions that it considers will negatively affect the uptake of a new rate, including: (a) the proration of the maximum net injection limit based on the number of Benefitting Customers, (b) barring a customer taking service under RS 1289 or RS 2289 from being a Benefitting Customer under RS 2290, and (c) limiting a Benefitting Customer to participating in one Shared Generating Facility at a time. BCSEA believes it would be better to consider the results of the proposed five-year evaluation and to add limitations, if required, at that time.¹⁸⁰ In addition, BCSEA considers that the timely introduction of RS 2290 would be more productive than trying to modify the details without real-world experience.¹⁸¹

Intervenors that oppose the 1 MW net injection limit submit that it imposes an arbitrary constraint that undermines the viability of community generation projects, and note that in other jurisdictions there is no such limit or the limit is significantly higher, e.g. 5 MW. Other intervenors also oppose the additional constraints on the net injection limit and distribution of benefits among Benefitting Customers because the constraints on RS 2290 are not comparable to those in RS 2289, their implementation is not considered adequately justified and such constraints will reduce the likely uptake of RS 2290.¹⁸²

EcoSmart submits that the 1 MW net injection limit is an arbitrary market barrier. First, EcoSmart states that BC Hydro's position is inconsistent as the utility poses that the 1 MW net injection limit will prevent Community Generators from becoming independent power producers while asserting that Community Generators cannot be independent power producers because they are governed by a rate and must have subscribers. EcoSmart submits that both arguments cannot be true at the same time. Second, EcoSmart states that BC Hydro claims that the net injection limit protects developers from costly interconnections. EcoSmart submits that if developers find a project is uneconomic, they will not build it; and BC Hydro's position does not represent a protection of developers, but a market barrier.¹⁸³

Finally, as previously mentioned in Section 2.4, CSC submits that it is more appropriate to apply individual net injection limits based on technical constraints at each customer's site, specifically the maximum continuous power capacity of the utility service for each customer; and proposes an alternative approach to net injection limits which includes a preliminary screening, the use of smart inverter voltage mitigation in customers and the provision of hosting capacity information by BC Hydro.¹⁸⁴

In reply to parties that oppose the limitations proposed for RS 2290, specifically the rules that establish a Shared Generating Facility net injection limit, limitations to customers taking service under RS 1289 or RS 2289 from being Benefitting Customers under RS 2290 and limitations to Benefitting Customers to participating in one Shared Generating Facility at a time, BC Hydro submits that it stands by the rationale provided for each of the proposed constraints. BC Hydro further maintains it is appropriate and prudent to start the implementation of RS 2290 with reasonable limits, evaluate its energy needs through long-term planning processes, and as part of the broader planning process consider whether to relax the limitations on RS 2290 as resource needs dictate.¹⁸⁵

¹⁷⁹ BCSEA Final Argument, p. 14; CEC Final Argument, p. 3; COSCO-RCIA Final Argument, pp. 29-30.

¹⁸⁰ *Ibid.*, p. 13.

¹⁸¹ *Ibid.*, p. 14.

¹⁸² EcoSmart Final Argument, pp. 7, 13; LGI Final Argument, pdf pp. 7-8; CSC Final Argument pp. 19-20.

¹⁸³ EcoSmart Final Argument, p. 51.

¹⁸⁴ CSC Final Argument pp. 20-21.

¹⁸⁵ BC Hydro Reply Argument, pp. 2, 11-12.

Panel Determination

The Panel finds a Community Net Injection limit of 2 MW is a reasonable starting point for RS 2290. In addition, the Panel finds reasonable that RS 2290 include BC Hydro’s proposed eligibility criteria: a) limits to the maximum net injection of Shared Generating Facilities based on the number and types of Benefitting Customers; and b) limits to the allocation of benefits to Benefitting Customers.

The Panel generally supports mechanisms that encourage the community focused intent of RS 2290. In particular, given BC Hydro is not part of the commercial arrangements between Community Generators and Benefitting Customers, the Panel views it is appropriate that RS 2290 includes safeguards to ensure that the rate schedule cannot be an alternate means for independent power producers to sell to BC Hydro, as it could lead to rate increases for all ratepayers. In this regard, the eligibility criteria of the prorated maximum injection limit and the Maximum Customer Allocation will ensure substantial community participation in Shared Generating Facilities.

With these other safeguards in place, the Panel does not view that a 1 MW limit is necessary to encourage community focus or prevent independent power producers; in practical terms under RS 2290’s eligibility criteria, a Shared Generating Facility with an injection limit of 1 MW or more would require at least 10 Benefitting Customers,¹⁸⁶ and any individual entity would be limited to a 10 percent share.¹⁸⁷ While BC Hydro has stated there are other reasons for the 1 MW limit, we do not find these arguments compelling. Firstly, while BC Hydro submits the 1 MW limit is partly intended to manage the volume of energy supplied from RS 2290, the Panel notes there is no evidence in this proceeding to suggest that energy from RS 2290 should be limited or promoted at this time, only BC Hydro’s position that such decision be deferred to an undefined future resource planning process. Secondly, we do not place significant weight on the technical demarcation and increased complexity of larger projects from the perspective of interconnection to the grid. The costs and risks for any applicable studies and upgrades will be borne by the prospective Community Generator, and it will be incumbent on them to decide whether to proceed. Finally, we observe that BC Hydro stated that the 1 MW limit was a policy choice.¹⁸⁸

On the other hand, we share the concerns raised by some parties that a 1 MW limit introduces an undue barrier to entry for Community Generators, as it potentially restricts the economies of scale that may otherwise be achieved by larger projects. In our view, a 2 MW Community Net Injection limit would reduce this barrier to entry in the early stages of the program, and represents a more reasonable starting point for RS 2290. As previously mentioned in Section 1.5, the Panel’s review is focused on rate design matters and does not address long-term resource planning issues. We understand that BC Hydro may assess the rationale of future changes to the net injection limit based on its resource planning processes and objectives. Recognizing participation in this new program may take time to materialize and there is uncertainty in terms of uptake, the Panel believes it will be beneficial that BC Hydro report back on its learnings and the progress of the program after a period of time, and to propose changes, if necessary.

3.4 Are BC Hydro’s Proposals for Crediting Community Generation Customers Appropriate?

BC Hydro proposes to offer an optional administrative service to Community Generators and their Benefitting Customers to remove a potential barrier of entry for Community Generators. Under this service, BC Hydro would

¹⁸⁶ The minimum number of Benefitting Customers for a Community Generator to meet 1 MW net injection limit is ten General Service Benefitting Customers (Exhibit 35, BC Hydro Undertaking 3, Attachment 2, Rate Schedule 2290 Tariff Sheet, Rule 9, p. 4).

¹⁸⁷ A Community Generator with 10 or more Benefitting Customer accounts can allocate a Benefitting Customer account up to 10 percent of the Community Generation Account balance (see Exhibit B-35, BC Hydro Undertaking 3, Attachment 2, Rate Schedule 2290 Tariff Sheet, Rule 8 (c), p. 4).

¹⁸⁸ Oral Hearing Revised Transcript Volume 1, November 17, 2025, p. 72.

allocate the financial credit for Net Generation to Benefitting Customers. The service is proposed to be optional because there is no natural monopoly for this service.¹⁸⁹

Given the uncertainty regarding the uptake of RS 2290 and of this optional service, BC Hydro proposes to offer the optional service at no cost to customers for a two-year period, which would allow BC Hydro to evaluate cost and details of the service. After this period, BC Hydro would advance agreements with each Community Generator to offer this service on a cost-recovery basis.¹⁹⁰

BC Hydro states it intends to offer a basic service that will require minimal investment to set up and, therefore, has minimal risk of stranded costs. BC Hydro's fee for the service will reflect the costs incurred to deliver the service. As a result, there will be no subsidy by utility ratepayers, the level of risk will be negligible, and it will support an economically efficient allocation of resources for ratepayers.¹⁹¹

Positions of the Parties

EcoSmart highlights that BC Hydro's proposal with respect to credit billing is different from the usual implementation in other jurisdictions. EcoSmart notes that in leading jurisdictions, the utility is responsible for the implementation of on-bill crediting, which provides certainty, efficiency and protection to Benefitting Customers.¹⁹²

Additionally, EcoSmart also considers that BC Hydro's optional billing service is not a commercially viable solution because BC Hydro would provide credits directly to the Benefitting Customers and then the Community Generator would need to seek compensation from each of the Benefitting Customers. In EcoSmart's view, this approach introduces a significant collection risk for the Community Generator and makes the Community Generator's business model unlikely to obtain financial support from financial institutions.¹⁹³

In reply to the notion that the optional credit billing creates an untenable risk to Community Generators, BC Hydro clarifies that while on-bill credit is not mandatory under RS 2290, it is available to interested Community Generators; and the service includes the ability for the Community Generator to have BC Hydro deduct a fee from Benefitting Customers.¹⁹⁴

Panel Determination

The Panel finds reasonable BC Hydro's proposal for an optional credit billing service for Community Generators at no cost during an initial two-year period, and then on a cost-recovery basis. Given this is a new rate schedule, the Panel considers BC Hydro's proposed optional service may help lower the initial barrier of entry to RS 2290 for some Community Generators in its initial stages. The Panel also finds it reasonable that BC Hydro offer the service at no cost for an initial period of time, for the utility to understand the components and costs of this service, with the expectation that the initial costs for the implementation of this service would be immaterial.

Consistent with elsewhere in the decision, the Panel places significant weight on the fairness of BC Hydro's RS 2290 proposals to non-participating ratepayers. We view that this proposed optional service presents a negligible risk of cost-shifting from participating to non-participating customers.

¹⁸⁹ Exhibit B-8, p. 39, Exhibit B-4, BCSEA IR 1.7.5.

¹⁹⁰ Exhibit B-8, pp. 39-40.

¹⁹¹ BC Hydro Final Argument, pp. 33-34.

¹⁹² EcoSmart Final Argument, pp. 8-9.

¹⁹³ *Ibid.*, pp. 8-9, 43.

¹⁹⁴ BC Hydro Reply Argument, p. 19.

The Panel acknowledges EcoSmart’s observations that BC Hydro’s proposed RS 2290 bill crediting mechanism is different than other jurisdictions and that Community Generators may or may not find it useful. Firstly, as we previously indicated in Section 3.1, we place limited weight on practices in other jurisdictions given that regulatory circumstances are different than BC Hydro’s. Secondly, we also note that this service is optional and Community Generators are not required to adopt it. More importantly, the Panel does not support BC Hydro incurring additional costs to be subsidized by ratepayers, to develop and administer an alternative crediting system (e.g. as proposed by Ecosmart) when there is no requirement for BC Hydro to provide such a service in order to implement RS 2290.

3.5 Should the Remainder of the Rate Schedule 2290 Terms and Conditions be Accepted?

BC Hydro’s RS 2290 Terms and Conditions¹⁹⁵ have evolved over the course of the proceeding.

BC Hydro indicates it is amenable to making information available to potential Benefitting Customers about Community Generator offerings. BC Hydro suggests the BCUC direct BC Hydro to create and maintain a website listing the Shared Generating Facilities and the arrangements being offered to potential Benefitting Customers and that BC Hydro could add a new clause in the RS 2290 Terms and Conditions under Item 1 of the Application and Interconnection Approval section stating: “A description of the arrangement being offered to potential Benefitting Customers to receive an allocated share of any Community Generator Account Balance. For clarity, the details included in the description are at the discretion of the Community Generator Customer.”¹⁹⁶

No issues were raised on this matter during the proceeding.

Panel Determination

The Panel finds reasonable the remainder of the terms and conditions outlined in RS 2290, as filed by BC Hydro. Additionally, to enhance the information available to parties that are interested in participating in RS 2290, BC Hydro is directed to create and maintain a website listing the Shared Generating Facilities and a description of the arrangement being offered to potential Benefitting Customers.

3.6 Overall Panel Determination on Rate Schedule 2290

Based on the foregoing reasons, the Panel determines that it is just and reasonable to establish a new RS 2290 as proposed by BC Hydro, subject to the adjustments as outlined in Section 3.3 above and summarized below.

Pursuant to sections 59 to 61 of the UCA, the Panel makes the following determinations regarding RS 2290:

1. **RS 2290, as shown in Exhibit B-35, BC Hydro Undertaking 3, Attachment 2, is approved effective July 1, 2026, with the following adjustments:**
 - a. **All references to 1 MW with respect to the maximum injection limit are to be replaced with 2 MW; and**
 - b. **All references to April 1, 2026 are to be replaced with July 1, 2026.**
2. **BC Hydro is directed to create and maintain a website listing the Shared Generating Facilities and a description of the arrangement being offered to potential Benefitting Customers to receive an allocated share of any Community Generator Account Balance.**

¹⁹⁵ Exhibit B-35, BC Hydro Undertaking 3, Attachment 2.

¹⁹⁶ Exhibit b-28, BCUC IR 2.1.1, Oral Hearing Revised Transcript Volume 2, November 18, 2025, pp. 37-39; Exhibit B-35, BC Hydro Undertaking 3, Attachment 2.

The Panel notes that, although BC Hydro originally sought an effective date of April 1, 2026 for RS 2290,¹⁹⁷ BC Hydro subsequently indicated that it was amenable to a later effective date.¹⁹⁸ The Panel has accordingly established an effective date of July 1, 2026, to allow sufficient time for BC Hydro to implement the rate following the issuance of this decision.

4.0 Other Tariffs Amendments

BC Hydro filed proposed amendments to the Electric Tariff and rate schedules directly affected by the introduction of the proposed RS 2289 and RS 2290, to be effective April 1, 2026, as follows:

- Electric Tariff Table of Contents and Terms and Conditions;¹⁹⁹ and
- RS 2101, Residential Service Time of Day.²⁰⁰

During the proceeding, no issues arose regarding the proposed amendments.

Panel Determination

The Panel approves BC Hydro’s proposed amendments to the Electric Tariff Table of Contents, Electric Tariff Terms and Conditions and RS 2101, as shown in Exhibit B-35, BC Hydro Undertaking 3, Attachment 2, effective July 1, 2026. We note that the purpose of these amendments is to align existing rates with the proposed changes to RS 1289 and the new RS 2289 and RS 2290.

5.0 Evaluation Process

BC Hydro proposes to evaluate its rate proposals and provide the BCUC with a report of its findings by April 30, 2030. Should BC Hydro consider there is a need to amend RS 2289 or RS 2290, BC Hydro will submit an application as part of the evaluation report.²⁰¹ BC Hydro states the range of issues that may be included in its five-year evaluation report include the following:²⁰²

- A review of the energy price for Net Generation based on updating the utility benefits input into the avoided cost framework and the expanded / comprehensive framework and a potential proposal to change the Energy Price effective January 1, 2031;
- If there is a divergence between the frameworks, an analysis of which framework should provide the basis for an updated Energy Price;
- An assessment of cost-shifting associated with RS 2289 and RS 2290;
- An assessment of customer-side economics (i.e., payback period) and customer participation including uptake, system characteristics such as size and location, benefiting customer characteristics, and benefitting customer savings;
- An update regarding BC Hydro’s optional Community Generation credit billing service;
- An assessment of whether to introduce a time varying price;
- An assessment of whether updates to the Energy Price should only apply to customers who join RS 2289 or RS 2290 after that update has been made or should also apply to existing customers; and

¹⁹⁷ Exhibit B-35, BC Hydro Undertaking 3, Attachment 2 .

¹⁹⁸ Exhibit B-27, p.1; BC Hydro Reply Argument, Cover Letter, page 1, footnote 1.

¹⁹⁹ Exhibit B-35, BC Hydro Undertaking 3, Attachment 2.

²⁰⁰ Ibid.

²⁰¹ Exhibit B-8, pp. 43-44; Exhibit B-13, BCUC IR 1.3.4.1.

²⁰² BC Hydro Final Argument, pp. 45-46.

- Whether to increase the net injection limits.

Positions of the Parties

Some interveners support the evaluation process as proposed by BC Hydro.²⁰³ Other interveners submit alternative recommendations regarding the evaluation process itself and/or the information that the evaluation process should include.²⁰⁴

LGI requests that BC Hydro be directed to include in its evaluation report the capacity, timing, and locational values of local generation, to ensure that compensation reflects the true benefits of distributed energy resources.²⁰⁵

COSCO-RCIA express concern that BC Hydro's proposed evaluation process is not sufficient as a safeguard from increases in cost-shifting, given the rapid and volatile evolution of the distributed energy resource market. COSCO-RCIA submit that the scope of future reviews should include a regulatory process at the outset and that the BCUC may, in the future, determine a formal review proceeding is not required. In addition, COSCO-RCIA propose a process that includes: a) a monitoring program of customer participation rates, total system injection and geographic concentration of customers; b) defined triggers of an earlier review process for the rate schedules – specifically the injection volume and community rate uptake-; and c) the scope of the five-year review being at least as broad as the current proceeding to maintain regulatory consistency and public confidence.²⁰⁶

Panel Determination

The Panel directs BC Hydro to file an Evaluation Report by April 30, 2030. The Evaluation Report must, at a minimum, address the following:

- **A summary of any significant changes in policy or BC Hydro's system needs which may impact the value or need for energy from Net Generation;**
- **An overview of the RS 2289 program over the evaluation period, including the number of participants by rate class, type of distributed generation installed, assessment of the range of sizes of installed generating facilities, annual volume of Net Generation, and customers' geographic distribution;**
- **An overview of the RS 2290 program over the evaluation period, including the number of Shared Generating Facilities, type of installed distributed generation, assessment of the range of the sizes of the installed generation, annual volume of Net Generation, Community Generators' geographic distribution and number of Benefitting Customers per Shared Generating Facility;**
- **A summary of any trends in uptake of RS 2289 and RS 2290 in areas of BC Hydro's system that are summer peaking, including a discussion on the merits of including any location-based benefits; and consideration for any distinction between integrated and non-integrated areas in the Energy Price;**
- **Review of the Energy Price for Net Generation based on updating the utility benefit inputs into the avoided cost framework and the expanded / comprehensive frameworks and an assessment of whether a change to the Energy Price effective January 1, 2031 is appropriate;**

²⁰³Zone II RPG Final Argument, p. 1; BCSEA Final Argument, pp. 3, 15; CEC Final Argument, p. 55

²⁰⁴ LGI Final Argument, pdf p. 12; COSCO-RCIA Final Argument, pp. 31-34.

²⁰⁵ LGI Final Argument, pdf p. 12.

²⁰⁶ COSCO-RCIA Final Argument, pp. 31-34.

- **If there is a divergence between the value of solar PV generation calculated under the avoided cost, expanded and comprehensive frameworks, an analysis of which framework should provide the basis for an updated Energy Price;**
- **An assessment of cost-shifting associated with RS 2289 and RS 2290, including the revenue to cost ratio of RS 2289 and RS 2290 with supporting calculations;**
- **An update on BC Hydro’s optional Community Generation Credit Billing Service;**
- **An assessment of whether to introduce a time varying price for Net Generation;**
- **An assessment of whether any updates to the Energy Price should only apply to new customers who join RS 2289 or RS 2290 after the implementation of the updated Energy Price or if it should also apply to existing customers. If the updates apply to all customers, whether there should be a transition period for existing customers; and**
- **Whether to adjust the net injection limits, including any supporting information from BC Hydro’s most recent long-term resource plan.**

As previously discussed in Section 2.3 of this decision, the Panel finds BC Hydro’s proposal to review the Energy Price after an evaluation of the proposed rate schedules to be appropriate. The Panel considers the evaluation interval strikes a reasonable balance between gathering enough operational experience on RS 2289 and RS 2290 to provide meaningful data for evaluation, while allowing a timely opportunity to revisit both rate schedules in light of any potential change in the forecast trend in avoided energy costs and any other potential changes to BC Hydro’s operational and planning environment. In addition, the evaluation interval allows for stability in the implementation of the approved rate schedules, as well as a reduced regulatory burden compared to more frequent reviews.

Finally, the Panel does not consider there is a need to define a future regulatory review process at this time. In practice, BC Hydro may choose to file an application for revised rates when submitting the Evaluation Report; and the BCUC, upon receiving the Evaluation Report, can assess whether there is merit in initiating further regulatory processes.

6.0 Confidentiality Requests

During the proceeding, BC Hydro filed the following exhibits on a confidential basis and submitted that these documents contain personal information or include information from a BC Hydro subscription to a product that prevents dissemination to third parties:

- Exhibit B-4-1, BC Hydro confidential responses to Intervener IR No. 1;
- Exhibit B-13-1, BC Hydro confidential responses to BCUC IR No. 1; and
- Exhibit B-29-1, BC Hydro confidential responses to Intervener IR No. 1 on rebuttal evidence.

BC Hydro also provided public versions of the above-mentioned confidential responses, with redacted information in Exhibit B-4, B-13 and B-29.

None of the parties commented on the confidentiality requests.

Panel Determination

Information filed confidentially by BC Hydro will be held confidential unless the BCUC determines otherwise. The Panel finds that the relevant documents either contain sensitive information or are subject to commercial agreements that prohibit disclosure to third parties.

DATED at the City of Vancouver, in the Province of British Columbia, this 24th day of March 2026.

Electronically signed by Mark Jaccard

M. Jaccard
Panel Chair/Commissioner

Electronically signed by Tom Loski

T. A. Loski
Commissioner

Electronically signed by Wendy Royle

W. E. Royle
Commissioner

British Columbia Hydro and Power Authority
Net Metering Service Rates

LIST OF TERMS AND ACRONYMS

Term/Acronym	Description
2024 RDA	2024 Rate Design Application
Application	The 2024 RDA and the Evidentiary Update
BC Hydro	British Columbia Hydro and Power Authority
BCOAPO	British Columbia Old Age Pensioners' Organization, et al.
BCSEA	BC Sustainable Energy Association
BCUC	British Columbia Utilities Commission
Benefitting Customers	BC Hydro customers that enter into agreements with Community Generators to share the benefits of Community Generators' operation of a facility
Bonbright Criteria	The eight rate design criteria identified by Dr. James Bonbright in <i>Principles of Public Utility Rates</i>
CEBC	Clean Energy Association of British Columbia
CEC	Commercial Energy Consumers Association of BC
Charge Solar et al.	Charge Solar, Riverside Energy Systems and Shift Energy Group Inc.
Community Net Injection Limit	Maximum amount of electricity allowed to be injected in BC Hydro grid by a Shared Generating Facility
COSCO	Council of Senior Citizens' Organizations of BC, Active Support Against Poverty, Disability Alliance BC, Tenants Resource and Advisory Centre, and Together Against Poverty Society
CSC	Community Solar Coalition
Dunsky	Dunsky Energy and Climate Advisors
EcoSmart	EcoSmart Foundation Inc.

Energy Price	Proposed energy price for generation injected to the BC Hydro grid
Evidentiary Update	Net Metering Evidentiary Update
IRs	Information Requests
kWh	kilowatt hours
Local Government Interveners or LGI	The City of Vancouver, Metro Vancouver Regional District, District of North Vancouver, and the City of Richmond
LRMC	Long-run marginal cost
Maximum Customer Allocation	Rule that establishes limits to the allocation of benefits from Shared Generating Facilities to Benefitting Customers
MoveUP	Movement of United Professionals
MW	Megawatts
Net Billing	Net billing compensation mechanism
Net Generation or Excess Generation	Electricity injected to BC Hydro grid by customers that generate electricity for their own use
Net Injection Limit	Limit to customers Net Generation, and replacing limits to customers' project size with limits to energy injected to BC Hydro grid
Net Metering	Net metering compensation mechanism
NIA	Non-integrated areas
PV	Photovoltaic
RCIA	Residential Consumer Intervener Association
RS	Rate Schedule
RS 1289	Net Metering Service Rate - Rate Schedule 1289
RS 2289	Self-Generation Service Rate - Rate Schedule 2289
RS 2290	Community Generation Service Rate - Rate Schedule 2290
Shared Generating Facility	Generating facility operated by Community Generator under RS 2290.
UCA	<i>Utilities Commission Act</i>

Working Group	Activities of a net metering working
Zone II RPG	Kwadacha Nation and Tsay Keh Dene Nation, together the Zone II Ratepayers Group

British Columbia Hydro and Power Authority
Net Metering Service Rates

EXHIBIT LIST

Exhibit No. Description

COMMISSION DOCUMENTS

A-11	February 21, 2025 – Panel Appointment
A-12	February 21, 2025 – BCUC Order G-39-25 establishing a regulatory timetable
A-13	February 25, 2025 – BCUC response to CBP intervener registration
A-14	April 11, 2025 – BCUC Response to Clement Request to Intervene
A-15	April 23, 2025 – BCUC Order G-105-25 establishing a further regulatory timetable
A-16	May 1, 2025 – BCUC Information Request No. 1 to BC Hydro
A-17	May 1, 2025 – BCUC Information Request No. 1 to BC Hydro – Confidential made Public
A-18	May 7, 2025 – BCUC request to BC Hydro re: EcoSmart letter
A-19	May 9, 2025 – BCUC response to CSC request for clarification on confidential IRs
A-20	May 14, 2025 – BCUC response to the CEC’s request for extension
A-21	May 15, 2025 – BCUC response to the Charge Solar et al.’s request for extension
A-22	May 16, 2025 – Panel response to EcoSmart letter
A-23	May 20, 2025 – BCUC response to CSC regarding access to confidential filings and request to BC Hydro
A-24	May 28, 2025 – BCUC letter to interveners providing guidance for evidence
A-25	June 4, 2025 – BCUC response to CSC - Evidence scoping and admittance
A-26	June 16, 2025 - BCUC Order G-145-25 with reasons regarding intervener evidence scope and regulatory timetable
A-27	June 25, 2025 – BCUC response to the extension requests of CSC and Solar et al.
A-28	June 26, 2025 – BCUC response to CSC regarding revised Notice of Intent and revised PCA request
A-29	July 4, 2025 – BCUC Order G-169-25 responding to CSC reconsideration request

A-30	July 10, 2025 – BCUC responding to CSC privacy concerns
A-31	July 11, 2025 – BCUC providing information regarding information requests on intervener evidence
A-32	July 29, 2025 – BCUC Information Request No. 1 to EcoSmart on Intervener Evidence
A-33	July 29, 2025 – BCUC Information Request No. 1 to CSC on Intervener Evidence
A-34	July 29, 2025 – BCUC letter regarding BCUC Information Request No. 1 on CEBC Intervener Evidence
A-35	July 29, 2025 – BCUC letter regarding BCUC Information Request No. 1 on ChargeSolar et. al. Intervener Evidence
A-36	September 22, 2025 – BCUC Order G-230-25 regarding use and disclosure of artificial intelligence
A-37	September 26, 2025 – BCUC Order G-236-25 regarding cross examination in oral hearing
A-38	October 8, 2025 – BCUC Information Request No. 1 to BC Hydro on Rebuttal Evidence
A-39	October 16, 2025 – BCUC request for filing submissions regarding final and reply arguments
A-40	October 27, 2025 – BCUC Order G-254-25 amending the regulatory timetable
A-41	October 27, 2025 – BCUC providing Oral Hearing information
A-42	November 10, 2025 – BCUC response to CEBC’s letter and request for submission
A-43	November 13, 2025 – Panel response to CEBC regarding Cross-Examination
A-44	November 24, 2025 – Request regarding corrections to oral hearing transcript
A-45	December 4, 2025 – Panel letter regarding an errata to the Oral Hearing Transcript
A-46	December 5, 2025 – Panel response to Agrivoltaics Canada’s request to intervene
A-47	December 5, 2025 – Panel response to Mr. Strong regarding the letter of comment
A-48	December 10-2025 – Panel response to Mr. Petroski regarding the letter of comment
A-49	December 19, 2025 – Panel response to BCSEA’s request to withdraw Final Argument
A-50	January 12, 2026 – BCUC letter regarding BCOAPO name change
A-51	January 13, 2026 – Panel response to Mr. Garrison regarding the letter of comment
A-52	January 15, 2026 – Order G-3-26 amending the regulatory timetable

APPLICANT DOCUMENTS

B-8	March 20, 2025 – BC Hydro submitting evidentiary update on net metering
B-8-1	June 12, 2025 – BC Hydro submitting Errata No.1 to Exhibit B-8
B-8-2	January 14, 2026 – BC Hydro submitting Errata No. 2 to Exhibit B-8, Appendix B-3
B-9	April 10, 2025 – BC Hydro reply to Intervener submissions
B-10	April 25, 2025 – BC Hydro submitting update on correspondence with CBP
B-11	May 13, 2025 – BC Hydro submitting response to letters from EcoSmart and CSC
B-12	May 28, 2025 – BC Hydro submitting response to Exhibit A-23
B-13	PUBLIC – June 12, 2025 – BC Hydro submitting response to BCUC Information Request No. 1
B-13-1	CONFIDENTIAL – June 12, 2025 – BC Hydro submitting response to BCUC Information Request No. 1
B-14	June 12, 2025 – BC Hydro submitting response to BCUC Confidential Information Requests No. 1 made Public
B-15	June 12, 2025 – BC Hydro submitting response to Interveners Information Request No. 1
B-16	June 12, 2025 – BC Hydro submitting Appendix 1 – Updated Tariff Sheets
B-17	June 20, 2025 – BC Hydro submission regarding the CSC request
B-18	June 30, 2025 – BC Hydro submission in response to Exhibit C10-16
B-19	July 31, 2025 – BC Hydro submitting Information Request No. 1 to CEBC
B-20	July 31, 2025 – BC Hydro submitting Information Request No. 1 to Charge Solar et al.
B-21	July 31, 2025 – BC Hydro submitting Information Request No. 1 to CSC Rábago
B-22	July 31, 2025 – BC Hydro submitting Information Request No. 1 to EcoSmart
B-23	August 14, 2025 – BC Hydro submitting Notice of Intent to file Rebuttal Evidence
B-24	September 18, 2025 – BC Hydro submitting Rebuttal Evidence
B-25	September 18, 2025 – BC Hydro submitting Dunsky Rebuttal Evidence
B-26	September 18, 2025 – BC Hydro submitting AI Disclosure Request
B-27	October 6, 2025 – BC Hydro submission on intention to cross examine

B-28	October 23, 2025 – BC Hydro response to BCUC Information Request No. 1 on Rebuttal Evidence
B-29	October 23, 2025 – BC Hydro response to Intervener Information Request No. 1 on Rebuttal Evidence
B-29-1	CONFIDENTIAL – October 23, 2025 – BC Hydro response to Intervener Information Request No. 1 on Rebuttal Evidence
B-29-2	November 28, 2025 – BC Hydro submitting Revised Response to Zone II RPG Information Request
B-30	November 7, 2025 – BC Hydro submitting Witness Panels Information in response to A-41
B-31	November 10, 2025 – BC Hydro submitting Oral Hearing cross-examination update
B-32	November 13, 2025 – BC Hydro submitting Direct Testimony and Opening Statement
B-33	November 21, 2025 – BC Hydro submitting Correction Request to Transcript Volumes 1, 2 and 3
B-34	November 26, 2025 – BC Hydro submitting additional Transcript Correction Request
B-35	November 28, 2025 – BC Hydro submitting Oral Hearing Undertaking Responses
B-35-1	December 3, 2025 – BC Hydro submitting Supplement to Oral Hearing Undertaking Responses

INTERVENER DOCUMENTS

C1-5	April 3, 2025 – EcoSMART FOUNDATION INC. (EcoSMART) – Submission on the Regulatory Process
C1-6	May 6, 2025 – EcoSmart submission on BC Hydro Community Generation
C1-7	May 15, 2025 – EcoSmart submitting Information Request No. 1 to BC Hydro
C1-8	May 15, 2025 – EcoSmart submitting notice of intent to file Intervener Evidence
C1-9	June 3, 2025 – EcoSmart submission on evidence scope
C1-10	June 5, 2025 - EcoSmart submission on evidence scope
C1-11	July 3, 2025 – EcoSmart submission in response to Exhibit C10-17
C1-12	July 10, 2025 – EcoSmart evidence submission
C1-12-1	July 10, 2025 – EcoSmart evidence with erratum correction submission
C1-12-2	November 20, 2025 – EcoSmart submitting Errata to C1-12-1 Figure C-1

C1-13	July 30, 2025 – EcoSmart submitting Information Request No. 1 to Charge Solar et al.
C1-14	August 28, 2025 – EcoSmart submitting responses to Information Request No. 1 on EcoSmart Evidence
C1-15	September 29, 2025 – EcoSmart submitting generative artificial intelligence disclosure
C1-16	October 6, 2025 – EcoSmart submission on intention to cross examine
C1-17	October 9, 2025 – EcoSmart submitting Information Request No. 1 to BC Hydro on Rebuttal Evidence
C1-18	October 21, 2025 – EcoSmart submission on Final and Reply Arguments
C1-19	October 28, 2025 – EcoSmart submitting Confidentiality Declaration and Undertaking Form
C1-20	November 7, 2025 – EcoSmart submitting Witness Panels Information
C1-21	November 15, 2025 – EcoSmart submitting Direct Testimony and Opening Statement
C2-4	April 1, 2025 – MOVEMENT OF UNITED PROFESSIONALS (MOVEUP) – Submission on the Regulatory Process
C2-5	May 15, 2025 – MoveUP submitting Information Request No. 1 to BC Hydro
C2-6	July 22, 2025 – MoveUP submitting Information Request No. 1 to EcoSmart
C2-7	September 29, 2025 – MoveUp submitting Request to Cross-Examine
C5-6	March 31, 2025 – BC SUSTAINABLE ENERGY ASSOCIATION (BCSEA) – Submission on the Regulatory Process
C5-7	May 14, – 2025 BCSEA submitting Information Request No. 1 to BC Hydro
C5-8	July 24, 2025 – BCSEA submitting Information Request No. 1 to EcoSmart
C5-9	July 24, 2025 – BCSEA submitting Information Request No. 1 to CSC
C5-10	July 24, 2025 – BCSEA submitting Information Request No. 1 to CEBC
C5-11	July 24, 2025 – BCSEA submitting Information Request No. 1 to Charge Solar, Riverside, Hightide, Shift
C5-12	October 6, 2025 – BCSEA submission on intention to cross examine
C5-13	October 9, 2025 – BCSEA submitting no Information Request on rebuttal evidence
C5-14	October 17, 2025 – BCSEA submission on Final and Reply Arguments
C5-15	December 16, 2025 – BCSEA submitting request to withdraw Final Argument

C6-4	April 3, 2025 – BRITISH COLUMBIA OLD AGE PENSIONERS’ ORGANIZATION ET AL. (BCOAPO) – Submission on the Regulatory Process
C6-5	May 15, 2025 – BCOAPO-RCIA submitting joint Information Request No. 1 to BC Hydro
C6-6	May 15, 2025 – BCOAPO-RCIA submitting notice of intent to file Intervener Evidence
C6-7	July 31, 2025 – BCOAPO-RCIA submitting joint Information Request No. 1 to Charge Solar et al
C6-8	July 31, 2025 – BCOAPO-RCIA submitting joint Information Request No. 1 to CEBC
C6-9	July 31, 2025 – BCOAPO-RCIA submitting joint Information Request No. 1 to EcoSmart
C6-10	July 31, 2025 – BCOAPO-RCIA submitting joint Information Request No. 1 to CSC Lipson
C6-11	July 31, 2025 – BCOAPO-RCIA submitting joint Information Request No. 1 to CSC Rábago
C6-12	October 6, 2025 – BCOAPO-RCIA joint submission on intention to cross examine
C6-13	October 9, 2025 – BCOAPO-RCIA submitting joint Information Request No. 1 to BC Hydro on Rebuttal Evidence
C6-14	October 22, 2025 – BCOAPO-RCIA joint submission on Final and Reply Arguments
C6-15	November 12, 2025 – BCOAPO-RCIA submitting response to CEBC
C6-16	January 7, 2026 – BCPIAC submission regarding BCOAPO and change in client organizations
C9-3	April 3, 2025 – COMMERCIAL ENERGY CONSUMERS ASSOCIATION OF BC (CEC) – Submission on the Regulatory Process
C9-4	May 13, 2025 – CEC requesting extension for filing Information Request No. 1
C9-5	May 21, 2025 – CEC submitting Information Request No. 1 to BC Hydro
C9-6	July 31, 2025 – CEC submitting Information Request No. 1 to CEBC
C9-7	July 31, 2025 – CEC submitting Information Request No. 1 to Charge Solar, Riverside, Hightide, Shift
C9-8	July 31, 2025 – CEC submitting Information Request No. 1 to CSC
C9-9	July 31, 2025 – CEC submitting Information Request No. 1 to EcoSmart
C9-10	October 6, 2025 – CEC submission on intention to cross examine
C9-11	October 9, 2025 – CEC submitting Information Request No. 1 to BC Hydro on Rebuttal Evidence

C9-12	October 22, 2025 – CEC submission on Final and Reply Arguments
C9-13	November 12, 2025 – CEC submitting response to CEBC
C9-14	Submitted by CEC at Oral Hearing November 18, 2025 - Aid to cross examination
C10-5	March 27, 2025 – CSC COMMUNITY SOLAR COALITION (CSC) – Submission on the Regulatory Process
C10-6	April 3, 2025 – CSC submitting Further Submission on the Regulatory Process
C10-7	May 7, 2025 – CSC submitting request for clarification on confidential IRs
C10-8	May 15, 2025 – CSC submitting Information Request No. 1 to BC Hydro
C10-9	May 15, 2025 – CSC submitting notice of intent to file Intervener Evidence
C10-10	May 15, 2025 – CSC submitting request for access to confidential documents
C10-11	May 30, 2025 – CSC submitting evidence and request for scope ruling
C10-12	June 6, 2025 – CSC submitting request for reconsideration of scope ruling
C10-13	June 10, 2025 – CSC submitting request for reconsideration of scope ruling
C10-14	June 10, 2025 – CSC submitting Confidentiality Declaration and Undertaking Form for Kjell Liem
C10-14-1	November 12, 2025 – CSC submitting additional Confidentiality Declaration and Undertaking for Kjell Liem
C10-15	June 23, 2025 – CSC submitting extension request for filing Intervener Evidence
C10-16	June 27, 2025 – CSC submitting clarification in response to Exhibit A-28
C10-17	June 27, 2025 – CSC submission regarding admissibility of evidence and request for procedural clarification
C10-18	July 5, 2025 – CSC submitting clarification in response to Exhibit C1-11
C10-19	July 7, 2025 – CSC submitting request for redacting personal contact information
C10-20	July 10, 2025 – CSC evidence submission - Lipson PEng.
C10-21	July 10, 2025 – CSC evidence submission - Rábago
C10-22	July 31, 2025 – CSC submitting Information Request No. 1 to EcoSmart
C10-23	July 31, 2025 – CSC submitting Information Request No. 1 to CEBC

C10-24	July 31, 2025 – CSC submitting Information Request No. 1 to Charge Solar et al
C10-25	August 28, 2025 – CSC submitting responses to Information Request No. 1 on Intervener Evidence
C10-26	October 6, 2025 – CSC submission on intention to cross examine
C10-27	October 9, 2025 – CSC submitting Information Request No. 1 to BC Hydro on rebuttal evidence
C10-28	October 22, 2025 – CSC submission on Final and Reply Arguments
C10-29	November 7, 2025 – CSC submitting Witness Panels Information
C10-30	Submitted by CSC at Oral Hearing November 19, 2025 - Aid to cross examination
C10-31	Submitted by CSC at Oral Hearing November 19, 2025 - Aid to cross examination #2
C11-5	April 3, 2025 – RESIDENTIAL CONSUMER INTERVENER ASSOCIATION (RCIA) – Submission on the Regulatory Process
C12-7	May 14, 2025 – CHARGE SOLAR (CHARGE SOLAR), RIVERSIDE ENERGY SYSTEMS (RIVERSIDE), HIGH TIDE ENERGY INC. (HIGH TIDE) AND SHIFT ENERGY GROUP INC. (SHIFT) ET AL. – requesting extension for filing Information Request No. 1
C12-8	May 20, 2025 – Charge Solar, Riverside, Hightide, Shift submitting Information Request No. 1 to BC Hydro
C12-9	May 20, 2025 – Charge Solar, Riverside, Hightide, Shift submitting Notice of Intent to File Evidence
C12-10	June 3, 2025 – Charge Solar, Riverside, Hightide, Shift submission on evidence scope
C12-11	June 24, 2025 – Charge Solar, Riverside, Hightide, Shift submitting extension request for filing Intervener Evidence
C12-12	July 10, 2025 – Charge Solar, Riverside, Hightide, Shift evidence submission
C12-13	August 28, 2025 – Charge Solar, Riverside, Hightide, Shift submitting responses to Information Request No. 1 on Intervener Evidence
C12-14	October 6, 2025 – Charge Solar, Riverside, Shift submission on intention to cross examine and withdrawal of Hightide
C12-15	October 9, 2025 – Charge Solar, Riverside, Shift submitting Information Request No. 1 to BC Hydro on rebuttal evidence
C12-16	October 20, 2025 – Charge Solar, Riverside, Shift submission on Final and Reply Arguments
C12-17	November 7, 2025 – Charge Solar, Riverside, Shift submitting Witness Panels Information

C13-3	October 6, 2025 – CITY OF VANCOUVER (CoV), METRO VANCOUVER REGIONAL DISTRICT (METRO VANCOUVER), DISTRICT OF NORTH VANCOUVER (District of NV) AND CITY OF RICHMOND (CoR) – Submission on intention to cross examine
C13-4	October 21, 2025 – CoV, Metro Vancouver, District of NV and CoR submission on Final and Reply Arguments
C14-4	April 3, 2025 – KWADACHA NATION AND TSAY KEH DENE NATION (TOGETHER THE ZONE II RATEPAYERS GROUP (ZONE II-RPG)) AND GITGA'AT FIRST NATION (GITGA'AT FIRST NATION) – Submission on the Regulatory Process
C14-5	May 15, 2025 – Zone II RPG submitting Information Request No. 1 to BC Hydro
C14-6	July 31, 2025 – Zone II RPG submitting Information Request No. 1 to CEBC
C14-7	July 31, 2025 – Zone II RPG submitting Information Request No. 1 to Charge Solar, Riverside, Hightide, Shift
C14-8	July 31, 2025 – Zone II RPG submitting Information Request No. 1 to CSC
C14-9	July 31, 2025 – Zone II RPG submitting Information Request No. 1 to EcoSmart
C14-10	October 6, 2025 – Zone II RPG submission on intention to cross examine
C14-11	October 9, 2025 – Zone II RPG submitting Information Request No. 1 to BC Hydro on Rebuttal Evidence
C14-12	October 22, 2025 – Zone II RPG submission on Final and Reply Arguments
C14-13	Submitted by Zone II RPG at Oral Hearing November 17, 2025 - Aid to cross examination
C15-1	February 22, 2025 – CB POWERLINE LTD. (CBP) - Request to intervene by John Keating
C15-2	April 3, 2025 – CBP Submission on the Regulatory Process
C15-3	April 30, 2025 – CBP submitting withdrawal of intervener status
C16-1	April 1, 2025 – CLEAN ENERGY ASSOCIATION OF BRITISH COLUMBIA (CEBC) - Request to intervene by Jack Magnus
C16-2	April 3, 2025 – CEBC submission on Regulatory Process
C16-3	May 15, 2025 – CEBC submitting Information Request No. 1 to BC Hydro
C16-4	May 15, 2025 – CEBC submitting notice of intent to file Intervener Evidence
C16-5	June 11, 2025 – CEBC submitting request for clarification on scope of evidence
C16-6	July 10, 2025 – CEBC evidence submission

C16-7	July 31, 2025 – CEBC submitting Information Request No. 1 to CSC Lipson
C16-8	August 28, 2025 – CEBC submitting responses to BCH Information Request No. 1 on Intervener Evidence
C16-9	August 28, 2025 – CEBC submitting responses to Interveners Information Request No. 1 on Intervener Evidence
C16-10	October 6, 2025 – CEBC submission on intention to cross examine
C16-11	October 9, 2025 – CEBC submitting Information Request No. 1 to BC Hydro on Rebuttal Evidence
C16-12	October 22, 2025 – CEBC submission on Final and Reply Arguments
C16-13	November 7, 2025 – CEBC withdrawal of intention to cross examine
C16-14	November 14, 2025 – CEBC submitting Witness Panels Information
C16-15	November 18, 2025 - CEBC submitting Opening Statement

LETTERS OF COMMENT

D-55	March 6, 2025 - SPROULE, J. (SPROULE) - Letter of Comment
D-56	March 7, 2025 - NERLAND, A. (NERLAND) - Letter of Comment
D-57	March 23, 2025 - MEARS, J. (MEARS) - Letter of Comment
D-57-1	March 24, 2025 - MEARS, J. (MEARS) - Letter of Comment Correction
D-58	April 8, 2025 - CLEMENT, J. (CLEMENT) - Letter of Comment
D-58-1	July 1, 2025 – Clement Further Letter of Comment
D-59	April 10, 2025 - OCEANVOLT SOLAR & EV (OCEANVOLT) - Letter of Comment
D-59-1	July 10, 2025 – OCEANVOLT SOLAR & EV (OCEANVOLT) – Further Letter of Comment
D-60	April 11, 2025 - BAUMAN, S. (BAUMAN) - Letter of Comment
D-61	May 23, 2025 – BAXTER, R. (BAXTER) - Letter of Comment
D-62	May 27, 2025 – EWING, L. (EWING) - Letter of Comment
D-63	May 27, 2025 – TZEACHTEN FIRST NATION (TZEACHTEN FN) - Letter of Comment
D-64	May 28, 2025 – QUATSINO FIRST NATION (QUATSINO FN) - Letter of Comment

D-65	June 6, 2025 – BAUMANN, E. (BAUMANN) – Letter of Comment
D-66	June 16, 2025 – ENSING, H. (ENSING) – Letter of Comment
D-67	June 27, 2025 – VIRIDIAN SOLAR (VIRIDIAN) – Letter of Comment
D-68	June 27, 2025 – SQ'ÉWQEL (SEABIRD ISLAND) – Letter of Comment
D-69	July 25, 2025 – SHARPE, B. (SHARPE) – Letter of Comment
D-70	July 25, 2025 – KIS-TOTH, P. (KIS-TOTH) – Letter of Comment
D-71	July 25, 2025 – OUELLETTE, D. (OUELLETTE) – Letter of Comment
D-72	July 25, 2025 – BECKETT, D. (BECKETT) – Letter of Comment
D-73	July 26, 2025 – WILLIAMS, S. (WILLIAMS) – Letter of Comment
D-74	July 26, 2025 – DITTMAN, E. (DITTMAN) – Letter of Comment
D-75	July 26, 2025 – LORIMER, R. (LORIMER) – Letter of Comment
D-76	July 26, 2025 – SVOBODA, T. (SVOBODA) – Letter of Comment
D-77	July 27, 2025 – GRENKOW, C. (GRENKOW) – Letter of Comment
D-78	July 27, 2025 – LAYMAN, E. (LAYMAN) – Letter of Comment
D-79	July 27, 2025 – MERTZ, B. (MERTZ) – Letter of Comment
D-80	July 31, 2025 – CHATTERJEE, R. (CHATTERJEE) – Letter of Comment
D-81	August 8, 2025 – Vos, M. (Vos) – Letter of Comment
D-82	August 28, 2025 – PETERS, D. (PETERS) – Letter of Comment
D-83	August 29, 2025 – PIKE, D. (PIKE) – Letter of Comment
D-84	November 15, 2025 – GARTSHORE, I. (GARTSHORE) – Letter of Comment
D-85	December 1, 2025 – ELDERTON, D. (ELDERTON) – Letter of Comment
D-86	December 1, 2025 – DUPUY, J.P. (DUPUY) – Letter of Comment
D-87	December 1, 2025 – MACISAAC, G. (MACISAAC) – Letter of Comment
D-88	December 2, 2025 – ANDERSEN, B. (ANDERSEN) – Letter of Comment
D-89	December 2, 2025 – DREWRY, D. (DREWRY) – Letter of Comment
D-90	December 2, 2025 – OKANAGAN SOLAR (OKANAGAN SOLAR) – Letter of Comment

D-90-1	December 2, 2025 – Okanagan Solar submitting second Letter of Comment
D-91	December 2, 2025 – STARLING, R. (STARLING) – Letter of Comment
D-92	December 2, 2025 – KUIPERS, R. (KUIPERS) – Letter of Comment
D-93	December 2, 2025 – MARRIOTT, J. (MARRIOTT) – Letter of Comment
D-94	December 2, 2025 – WALSH, E. (WALSH) – Letter of Comment
D-95	December 2, 2025 – BE SOLAR (BE SOLAR) – Letter of Comment
D-96	December 2, 2025 – LG ELECTRIC (LG ELECTRIC) – Letter of Comment
D-97	December 2, 2025 – BREWIS ELECTRIC COMPANY (BREWIS) – Letter of Comment
D-98	December 2, 2025 – DOYLE, T. (DOYLE) – Letter of Comment
D-99	December 2, 2025 – OLSON, D. (OLSON) – Letter of Comment
D-100	December 2, 2025 – MCKIMMIE, N. (MCKIMMIE) – Letter of Comment
D-101	December 2, 2025 – INFINITY SOLAR GROUP LTD. (ISG) – Letter of Comment
D-102	December 2, 2025 – SKAILES, J. (SKAILES) – Letter of Comment
D-103	December 2, 2025 – SMALL PLANET ENERGY INC. (SPE) – Letter of Comment
D-104	December 2, 2025 – MARTIN, D. (MARTIN) – Letter of Comment
D-105	December 2, 2025 – HAMMONTREE, K. (HAMMONTREE) – Letter of Comment
D-106	December 2, 2025 – SOLOS ENERGY (SOLOS) – Letter of Comment
D-107	December 2, 2025 – ELLERBECK, S. (ELLERBECK) – Letter of Comment
D-108	December 2, 2025 – WANG, B. (WANG) – Letter of Comment
D-109	December 2, 2025 – DOUBLE L ELECTRIC (DOUBLE L) – Letter of Comment
D-110	December 2, 2025 – MARSHALL, B. (MARSHALL) – Letter of Comment
D-111	December 2, 2025 – BONSER, L. (BONSER) – Letter of Comment
D-112	December 2, 2025 – VRLAK, A. (VRLAK) – Letter of Comment
D-113	December 2, 2025 – CUI, A. (CUI) – Letter of Comment
D-114	December 2, 2025 – WEMYSS, N. (WEMYSS) – Letter of Comment
D-115	December 2, 2025 – MCHAFFIE, L. (MCHAFFIE) – Letter of Comment

D-116	December 2, 2025 – LUSZCZEK, J. (LUSZCZEK) – Letter of Comment
D-117	December 3, 2025 – EWING, L. (EWING) – Letter of Comment
D-118	December 3, 2025 – NILSSON, K. (NILSSON) – Letter of Comment
D-119	December 3, 2025 – BRADBURY, J. (BRADBURY) – Letter of Comment
D-120	December 3, 2025 – HIGH TIDE ENERGY INC. (HIGH TIDE) – Letter of Comment
D-121	December 3, 2025 – PEAREN, G. (PEAREN) – Letter of Comment
D-122	December 3, 2025 – PEACE ENERGY COOPERATIVE (PEACE ENERGY) – Letter of Comment
D-123	December 3, 2025 – PENFOLDS ROOFING AND SOLAR (PENFOLDS) – Letter of Comment
D-124	December 3, 2025 – TERRATEK ENERGY SOLUTIONS INC. (TERRATEK) – Letter of Comment
D-125	December 3, 2025 – KENNEDY, J. (KENNEDY) – Letter of Comment
D-126	December 3, 2025 – OSPREY ELECTRIC LTD. (OSPREY ELECTRIC) – Letter of Comment
D-127	December 3, 2025 – HODSWOOD, O. (HODSWOOD) – Letter of Comment
D-128	December 3, 2025 – HAKAI ENERGY SOLUTIONS (HAKAI) – Letter of Comment
D-129	December 3, 2025 – ENERGY ECONOMICS (ENERGY ECONOMICS) – Letter of Comment
D-130	December 3, 2025 – WALKER, D. (WALKER) – Letter of Comment
D-131	December 3, 2025 – BROSSARD, T. (BROSSARD) – Letter of Comment
D-132	December 3, 2025 – NORTH OKANAGAN ROOFING LTD. (NORTH OKANAGAN ROOFING) – Letter of Comment
D-133	December 3, 2025 – COWIE, D. (COWIE) – Letter of Comment
D-134	December 3, 2025 – DILLON, D. (DILLON) – Letter of Comment
D-135	December 3, 2025 – STARDUST SOLAR ENERGY INC. (STARDUST) – Letter of Comment
D-136	December 3, 2025 – WEBER, M. (WEBER) – Letter of Comment
D-137	December 2, 2025 – 1423218 BC LTD. (1423218 BC) – Letter of Comment