

Nathaniel Yee
PO Box 89
Faro, YT Y0B1K0
travelslowly@gmail.com

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IRs and Commentary
Board Orders 2023-04 and 2022-07

Rebasing and billing system questions and comments:

From board order 2022-07:

“The Board is concerned that customers may find the application of YEC’s and AEY’s riders to be confusing.”

Unfortunately I don’t see any of the proposed solutions really answering this concern.

Rolling some of the riders into base rates does not solve the issue, as the rest of the riders remain on the billing statement, and the customer is still not being informed of the actual rate being charged.

That is, the rebased rates listed under Option 4 still do not reflect what the customer actually pays per kwh.

A customer would be justifiably confused if told a certain rate, only to find that this rate is never what is actually charged.

A possible solution would be to put “Actual Rate per kWh” on the billing statement. This rate reflects the effects of all of the riders. The details of how each rider affects the bill can be given separately in fine print for the curious if this is felt to be necessary.

Electricity rates vary depending on the riders. Hiding this variation in a list of riders is confusing and deceptive to the customer.

- 1) Should customers be told what they are actually paying per kWh?
- 2) While those of us involved in the process are perhaps interested in how each of the riders works, would the customer be better served by being given a simple rate, cost/kWh?
- 3) What is the timeline for design and implementation of the new billing system?

- 4) What are the planned features or improvements of the new billing system?
- 5) Will the new billing system be able to accommodate potential future DSM efforts such as Time of Use metering, etc.?

In my Reply Argument from the 2021 GRA, I expanded a little on UCG’s concerns about this issue, with the same idea.

15. I agree that revenue requirement “should be rolled into base rates (without rate riders)” and that “consumers want to see and understand what they are paying for on their bills...” (UCG Arg p.5 Para.11) It would also seem that this would be an important part of any sort of DSM program. Asking consumers to undertake conservation measures while obscuring the results of those measures doesn’t make any sense. While month to month consistency in the cost per kwh is preferred, as an alternative YEC could or should include something like “Effective cost per kwh” with each billing statement. It is an easy calculation and should not be difficult to implement. And given that electricity rates and usage vary and are reported on a monthly basis, it would be very helpful to have each statement contain a history of the last 12 months of rates and usage to encourage some awareness of both. I update this in a spreadsheet monthly when my bill arrives, and this information has helped me make decisions that minimize my usage. The table below is given as an example of what could be used to augment or replace the less than useful 12 month “Consumption by Billing Cycle” chart currently on billing statements.

Statement Date	KWH Used	Cost per KWH	Cost excluding GST and Customer Charge
...
July-2021	179	\$0.19	\$34.01
Aug-2021	146	\$0.21	\$30.66
Sep-2021	189	\$0.20	\$37.80
Oct-2021	311	\$0.18	\$55.98
Avg monthly, last 12 months	238.8	\$0.19	\$45.37

- 6) Bills are affected by rates and by usage. Both of these vary. If historical data of usage is shown on a billing statement, is there any reason not to show historical rates also? As above or in a graph?
- 7) While I understand the Riders R and J as currently implemented apply to the Customer Charge, is there any thought to have them only apply to energy usage in the rebasing process? Part of the idea of DSM of course is that customers are rewarded financially for using less energy. Raising the Customer Charge rather than pushing all changes to rates runs counter to this idea.