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October 18, 2013

Via Email
Original via Mail

Citizens for Safe Technology Society
c/o David M. Aaron, Barrister & Solicitor
Box 479
Nelson, BC
V1L 5R3

Attention: Mr. David M. Aaron

Dear Mr. Aaron:

Re: FortisBC Inc. (FBC)
FBC Radio-Off AMI Meter Option Application
Response to the Citizens for Safe Technology Society (CSTS) Information
Request (IR) No. 1

On August 30, 2013, FBC filed the Application as referenced above. In accordance with Commission Order G-160-13 setting out the Amended Regulatory Timetable for the review of the Application, FBC respectfully submits the attached response to CSTS IR No. 1.

If further information is required, please contact the undersigned.

Sincerely,

FORTISBC INC.

Original signed:

Dennis Swanson

Attachments

cc: Commission Secretary
Registered Parties (email only)



FortisBC Inc. (FortisBC, FBC or the Company) Application for Advanced Metering Infrastructure (AMI) Radio-Off Meter Option (the Application)	Submission Date: October 18, 2013
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1 **Definitions:**

2 The following definitions apply to terms used in this information request:

3 "FBC" means FortisBC Inc.

4 "Former Proceedings" means the BCUC proceedings that resulted in BCUC Order C-7-
5 13;

6 "opt-out" means the opportunity for a utility customer to opt-out of accepting a radio-
7 frequency emitting smart meter or AMI meter; and

8 "PPSF" means per-premises setup fee.

9

10 **Eligible customers**

11 1. Under the regime contemplated by the present Opt-out Application, who are
12 eligible customers for the radio-off option?
13

14 **Response:**

15 All customers that have an AMI meter or who are scheduled to receive an AMI are eligible for
16 the Radio-off option.

17

18

19

20 2. Where FBC shows an estimated future customer total (2016) of 138,900, are all
21 those customers eligible to opt-out? If not, why not?
22

22

23 **Response:**

24 As stated in Exhibit B-1, Section 1.1, p 2 "Given that the Radio-Off Option applies only to the
25 AMI implementation, FBC customers that are not scheduled by FortisBC to receive an AMI
26 meter will not be eligible for the Radio-Off Option. These ineligible customers include large
27 power customers currently billed using the MV-90 system, lighting customers and other non-
28 metered customers."

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1
2 3. Under the regime contemplated by the present Opt-out Application, will
3 commercial account holders be eligible to opt-out and will the fees be the same
4 as for residential account holders?

5
6 **Response:**

7 Please refer to the responses to CSTS IRs 1.1 and 1.2.

8 If commercial customers are scheduled to receive an AMI meter, or post-deployment, have an
9 AMI meter, they are eligible for the Radio-off option.

10 Yes, the fees are the same, although customers billed under a monthly-read tariff will pay more
11 than customers billed under a bi-monthly-read tariff on an annual basis since the Per-read Fee
12 is the same but the number of reads differs.

13
14
15

16 **When can an opt-out choice be made?**

17 4. BCUC Order C-7-13 states “customers may choose to opt-out of accepting a
18 wireless transmission meter”.

19
20 5. Under the regime contemplated by the present Opt-out Application, may a given
21 customer exercise an opt-out choice at any time? For example, may a given
22 customer exercise an opt-out choice in the future after having already lived with
23 an FBC radio-on meter for several years?

24
25 **Response:**

26 Yes, customers may participate in the Radio-off Option at any time, subject to the applicable
27 fees.

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31 **Per-premises setup fee**

32 6. BCUC Order C-7-13 states “...in the event that the customer moves to a new
33 property, the opt-out choice will move with the customer.”



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1
2 7. Does FBC interpret the above-referenced order as allowing FBC to charge a
3 given customer an opt-out fee every time that customer moves to a new property
4 and makes an opt-out choice with respect to that new property?
5

6 **Response:**

7 Yes. The relevant costs are incurred at each premise that must be reconfigured to the radio-off
8 option, and the per read fee remains the same. Please also refer to the response to BCPSO IR
9 1.6.1.

10
11

12
13 8. Does the present Opt-out Application seek approval for FBC to:
14
15 a. charge a customer a new \$110 “PPSF” every time that customer moves to a
16 new property?
17

18 **Response:**

19 Yes, if the customer wishes to have a Radio-off meter at the new property. As the costs related
20 to the \$110 per premise set up fee are incurred at each premise reconfigured to the Radio-off
21 option, they are required each time. Please also refer to the response to BCPSO IR 1.6.1.

22
23

24
25 b. charge a customer a new \$110 “PPSF” where a customer moves to a new
26 property that already has a radio-off meter as a result of the outgoing
27 customer on that property having already paid a PPSF with respect to that
28 property?
29

30 **Response:**

31 Please refer to the response to BCPSO IR 1.6.1.

32
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1 9. Does the FBC Radio-off Option Form, attached as Appendix B to the Opt-out
2 Application, contemplate a new PPSF every time that customer moves to a new
3 property?
4

5 **Response:**

6 Yes, a \$110 per premise set up fee plus a new Radio-off AMI Meter Customer Application Form
7 will be required for each premise that seeks to participate in the radio-off option. Please also
8 refer to the response to BCPSO IR 1.6.1.

9
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12

13 **RF range extenders**

14 10. Apart from the context of a customer opt-out, what role do RF range extenders
15 have in the Fortis AMI program?
16

17 **Response:**

18 Range extenders are a component of the RF-mesh, extending the communications range of the
19 LAN and limiting the number of higher-cost collectors required. Range extenders also reduce
20 the WAN costs that would otherwise be associated with a higher number of collectors.

21
22

23
24 11. Can the Fortis AMI program operate without the use of RF range extenders?
25

26 **Response:**

27 An AMI system can function without range extenders if the range extenders are replaced with
28 collectors. Collectors are a) more expensive than range extenders, and b) incur WAN related
29 costs to backhaul data between collectors and the company. Given this it is not considered
30 prudent to replace range extenders with collectors.

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1 12. Apart from the context of a customer opt-out, will the FBC AMI program utilize RF
2 range extenders? If so, how many units will be utilized and in what context will
3 they be deployed?
4

5 **Response:**

6 Yes, as elaborated upon during the AMI CPCN regulatory process, the FortisBC AMI program
7 will utilize range extenders even if there is no participation in the radio-off option program.
8 Please also refer to the responses to CSTS IRs 1.10 and 1.11.

9 The preliminary network design calls for approximately 380 range extenders distributed as
10 required to fill “holes” in the RF mesh throughout the service territory.

11
12

13
14 13. Where FBC installs an RF range extender in order to fill a “gap” created by a
15 given customer’s opt-out choice, how much distance will there be between that
16 RF range extender and the residential dwelling of the given customer? Will FBC
17 commit to a minimum distance in that regard?
18

19 **Response:**

20 The distance between a range extender and customer building will depend on the many factors
21 that influence RF propagation including the mounting heights of the range extender and
22 customer meter, and the presence of any physical obstructions in the line-of-sight path between
23 the devices. Under optimal conditions, this distance can be over one kilometer, but can also be
24 considerably less. Please also refer to the response for BCUC IR 1.11.1.

25 FortisBC will not commit to a minimum distance requirement.

26
27

28
29 14. What is the power density output of an RF range extender at various given
30 distances?
31

32 **Response:**

33 This question is out-of-scope for this proceeding. For reference, however, FortisBC provides
34 the following information:
35



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	Distance	Power Density (mW/cm²)
1		
2	0.2m	0.22754
3	0.3m	0.101129
4	0.6m	0.025282
5	1.0m	0.009102
6	1.5m	0.004045
7	3.0m	0.001011
8		

9 The Company intends to mount range extenders on its existing poles, at approximately 5.5
10 meters (18 feet) above the ground.

11
12

13
14 15. Is the cost of the RF range extender a cost of reading an opt-out customer's
15 meter?
16

17 **Response:**

18 The costs for additional range extenders form part of the Per-premise Setup fee applicable to
19 those customers who elect to participate in the Radio-off option. It is not included in the Per-
20 read fee.

21
22

23
24 16. Is the cost of the RF range extender a cost of providing power to an opt-out
25 customer?
26

27 **Response:**

28 The cost related to range extenders in this application is an incremental cost of extending the
29 AMI RF mesh network due to network "holes" created by the radio-off option. Please also refer
30 to the response to CSTS IR 1.15.

31
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33
34 17. Why should an opt-out customer pay for the communication infrastructure of the
35 AMI program in which he/she is not participating?



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Response:

The Commission granted a CPCN subject to the condition that FortisBC confirm in writing by August 1, 2013 that it would file an application for an opt-out provision by November 1, 2013 based on the following principles:

- (a) *Customers may choose to opt-out of accepting a wireless transmitting meter.*
- (b) *Customers who choose to opt-out will be provided with an AMI meter that has the wireless transmit functions disabled. Transmit functions on those meters will be disabled until the individual chooses to opt back in to the AMI program; in the event that the customer moves from the property, the opt-out choice will move with the customer.*
- (c) *The incremental cost of opting-out of the AMI program will be borne by the individuals choosing to opt-out.*

Since there is incremental cost associated with extending the communication infrastructure to accommodate radio-off customers, per principle 3 above, radio-off customers must bear that cost.

18. What is the per unit cost of an RF extender and the field cost for overcoming the difficulty created by the 695 customers estimated to be radio-off customers?

Response:

Please refer to the Electronic Attachment to Exhibit B-2.

A range extender costs \$187. Installation costs are estimated at \$520 per range extender.

In aggregate, it is forecast that an additional \$1,473 in range extender and installation costs will be incurred to preserve RF-mesh functionality around customers who choose to participate in the Radio-off option.



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1 **Frequency of meter reading**

2 19. Under the regime contemplated by the present Opt-out Application, how often will
3 a given opt-out customer be subject to a \$22 per-read fee?
4

5 **Response:**

6 The per-read fee will be charged every time a manual read is required. Please also refer to the
7 response to BCSEA IR 1.14.1.
8
9

10
11 20. Under the regime contemplated by the present Opt-out Application, may a given
12 customer elect to have their meter read less often so as to reduce the frequency
13 of the proposed \$22 per-read fee? What options can be made available to
14 customers in that regard?
15

16 **Response:**

17 Please refer to the response to BCUC IR 1.9.4.
18
19

20
21 21. Under the regime contemplated by the present Opt-out Application, may opt-out
22 customers elect to be billed on an equal payment basis, based on the previous
23 year's consumption patterns, with a single reading at the end of the year to
24 confirm actual usage? Would this manner of billing reduce the \$22 per-read fee
25 to an annual occurrence?
26

27 **Response:**

28 No, radio-off customers may not elect to be billed on an equal payment basis, with a single read
29 at the end of the year. This manner of billing would increase the radio-off fees for radio-off
30 customers. Please refer to the responses to BCUC IR 1.9.4 and BCPSO IR 1.2.2.
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1 **Travel time**

2 22. What alternatives has FBC explored to having vehicles travel to the premises of
3 each opt-out customer?
4

5 **Response:**

6 Please refer to the responses to BCUC IR 1.9.4 and BCSEA IR 1.14.2.1.
7
8

9
10 23. Would it be possible for opt-out customers to use a USB memory stick or some
11 other device to download AMI meter data and send such data to FBC over the
12 internet? If no, why not?
13

14 **Response:**

15 Please refer to the response to CEC IR 1.14.2.1.
16
17

18
19 24. Will the FBC AMI meters have a glass face through which consumption data can
20 be seen and photographed? Can such a photograph be emailed by a customer
21 to FBC so as to communicate consumption data at any given time?
22

23 **Response:**

24 The AMI meter has a plastic face through which consumption data can be seen. Customers will
25 also be able to access consumption information via a Customer Information Portal and, if a
26 customer elects to set up a HAN, via a customer-owned IHD.

27 Please refer to the response to BCPSO IR 1.2.1.
28
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1 **Meter readers**

2 25. Apart from the proposed opt-out program, does FBC plan to employ field meter
3 readers in the context of its AMI program?
4

5 **Response:**

6 Yes, the Company expects to require manual meter reading for those customer premises for
7 which an economic WAN solution is unavailable.
8
9

10

11 **The cost of turning radios off**

12 26. Is it true that no new AMI meters have been installed by FBC?
13

14 **Response:**

15 FortisBC has not installed any AMI meters to date.
16
17

18

19 27. Is it true that the cost of installation of AMI meters at each customer location has
20 been incorporated into the AMI program budget that was put before the BCUC in
21 the Former Proceedings?
22

23 **Response:**

24 Confirmed (with the exception of certain ineligible customers such as large power customers
25 billed using the MV-90 system, lighting customers and other non-metered customers, as noted
26 in Exhibit B-1, Section 1.1, page 2).
27
28

29

30 28. Can the cost of turning radios off (for opt-out customers) be reduced by
31 specifying to the equipment provider that a number of new meters be delivered to
32 FBC in a radio-off configuration?
33



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1 **Response:**

2 Please refer to the response to BCUC IR 1.3.5.

3
4

5

6 29. Can the cost of turning radios off (for opt-out customers) be reduced by having
7 FBC turn those radios off before they are installed at customer residences?

8

9 **Response:**

10 Please refer to the responses to BCUC IRs 1.3.5 and 1.3.5.2.

11

12

13

14 **Opt-out revenue**

15 30. Can FBC confirm what revenue it will derive in opt-out fees on the basis of 695
16 likely radio-off customers?

17

18 **Response:**

19 Please refer to the response to CEC IR 1.1.3.

20

21

22

23 **Keeping analogue meters**

24 31. Where FBC is made aware of an opt-out choice with respect to a given property,
25 and where FBC has yet to install an AMI meter on that property, wouldn't it be
26 less costly to the customer if FBC were to allow the customer to keep their
27 analogue meter rather than go through the cost of replacing that meter with a
28 radio-off meter?

29



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1 **Response:**

2 This alternative was discussed in the original AMI application but is not an approved AMI “opt-
3 out” option.

4 The Commission granted a CPCN subject to the condition that FortisBC confirm in writing by
5 August 1, 2013 that it would file an application for an opt-out provision by November 1, 2013
6 based on the following principles:

7 (a) *Customers may choose to opt-out of accepting a wireless transmitting meter.*

8 (b) *Customers who choose to opt-out will be provided with an AMI meter that has the
9 wireless transmit functions disabled. Transmit functions on these meters will remain
10 disabled until the individual chooses to opt back in to the AMI program; in the event
11 that the customer moves to a new property, the opt-out choice will move with the
12 customer.*

13 (c) *The incremental cost of opting-out of the AMI program will be borne by the individual
14 choosing to opt-out.*

15
16 The second principle does not permit the customers to keep their analogue meter.

17
18

19
20 32. What are FBC’s reasons, if any, for replacing an analogue meter with a radio-off
21 AMI meter where the customer’s opt-out choice is known to FBC prior to
22 installation of the radio-off AMI meter? Why subject the customer to the cost if
23 FBC is not going to benefit from the real-time data transmission of an AMI meter?
24

25 **Response:**

26 Please refer to the response to CSTS IR 1.31.

27
28

29
30 33. Can you confirm that utilities in Nevada, Maine, New Mexico, Hawaii, California,
31 Arizona, Texas, Vermont, and the communities of Ashland and Eugene in
32 Oregon allow their customers to elect to keep and replace analogue meters,
33 notwithstanding the implementation of an AMI meter program?



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Response:

On July 31, 2013, FBC filed a letter confirming that it would proceed with the AMI Project subject to applying for an opt-out provision based on the Commission’s principles set out in its Decision. For reference FBC’s AMI Project was approved subject to an application for an opt-out program where:

- (a) *Customers may choose to opt-out of accepting a wireless transmitting meter.*
- (b) *Customers who choose to opt-out will be provided with an AMI meter that has the wireless transmit functions disabled. Transmit functions on those meters will be disabled until the individual chooses to opt back in to the AMI program; in the event that the customer moves from the property, the opt-out choice will move with the customer.*
- (c) *The incremental cost of opting-out of the AMI program will be borne by the individuals choosing to opt-out.*

On the basis of principle (b), allowing customers to keep their existing analog meter was not a consideration in FBC’s AMI Radio-Off Meter Option and is outside the scope of this proceeding.

In any event, the request would be overly broad even if within scope. California alone has over 25 electric utilities.

34. What benefits will be available to the customer from a radio-off smart meter that an analog cannot provide? How does the proposed opt-out fee justify those benefits, if any?

Response:

Please refer to the response to CSTS IR 1.31.



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1 **Other utilities**

2 35. Do any jurisdictions and/or utilities worldwide provide their customers with an
3 option to opt-out without having to pay a fee in relation to the opt-out?
4

5 **Response:**

6 On July 31, 2013, FBC filed a letter confirming that it would proceed with the AMI Project
7 subject to applying for an opt-out provision based on the Commission's principles set out in its
8 Decision. For reference FBC's AMI Project was approved subject to an application for an opt-
9 out program where:

10 (a) *Customers may choose to opt-out of accepting a wireless transmitting meter.*

11 (b) *Customers who choose to opt-out will be provided with an AMI meter that has the*
12 *wireless transmit functions disabled. Transmit functions on those meters will be*
13 *disabled until the individual chooses to opt back in to the AMI program; in the*
14 *event that the customer moves from the property, the opt-out choice will move*
15 *with the customer.*

16 (c) *The incremental cost of opting-out of the AMI program will be borne by the*
17 *individuals choosing to opt-out.*

18 Principle (c) states that "[t]he incremental cost of opting-out of the AMI program will be borne by
19 the individuals choosing to opt-out". The question posed is outside the scope of this
20 proceeding.
21

22 For reference, however, FBC is only aware of one U.S. municipal utility offering an option to opt-
23 out without having to a pay a fee. Please refer to the response to CSTS IR 1.38.

24
25

26
27 36. Do any jurisdictions and/or utilities worldwide provide their customers with an
28 option to opt-out by payment of a fee that is less than that proposed by FBC in
29 the present Opt-out Application?
30

31 **Response:**

32 Please refer to the response to BCPSO IR 1.4.1 which lists opt out costs of certain other
33 utilities. The opt out costs listed in response to BCPSO IR 1.4.1 shows utilities with opt out fees
34 that are both lower and higher than FBC's proposed opt out charges.



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2

3 37. Is the legality and/or implementation of an opt-out fee pending or subject to
4 regulatory approval in any jurisdiction worldwide?

5
6 **Response:**

7 FortisBC believes that the radio-off fee is legal in British Columbia, which is the jurisdiction at
8 issue. In its July 23, 2013 Order, the Commission granted the CPCN subject to the condition
9 that FortisBC confirm in writing by August 1, 2013 that it will file an application for an opt-out
10 provision by November 1, 2013 based on principles including that the incremental cost of
11 opting-out of the AMI program will be borne by the individuals choosing to opt out.

12
13

14
15 38. Can you confirm that utilities in New Mexico, Eugene and Ashland allow for an
16 opt-out without fee?

17
18 **Response:**

19 On July 31, 2013, FBC filed a letter confirming that it would proceed with the AMI Project
20 subject to applying for an opt-out provision based on the Commission's principles set out in its
21 Decision. For reference FBC's AMI Project was approved subject to an application for an opt-
22 out program where:

- 23 (a) *Customers may choose to opt-out of accepting a wireless transmitting meter.*
- 24 (b) *Customers who choose to opt-out will be provided with an AMI meter that has the*
25 *wireless transmit functions disabled. Transmit functions on those meters will be*
26 *disabled until the individual chooses to opt back in to the AMI program; in the*
27 *event that the customer moves from the property, the opt-out choice will move*
28 *with the customer.*
- 29 (c) *The incremental cost of opting-out of the AMI program will be borne by the*
30 *individuals choosing to opt-out.*

31
32 Principle (c) states that "[t]he incremental cost of opting-out of the AMI program will be borne by
33 the individuals choosing to opt-out". The question posed is outside the scope of this
34 proceeding.



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1 For reference, however, FBC notes that it was unable to confirm whether utilities in New Mexico
2 and Eugene allow for an opt-out without fee. FBC confirms that the City of Ashland Electric
3 Department recently announced it will not charge a fee for opt-out.

4
5

6 39. What are the features of the opt-out program in Quebec?

7

8 **Response:**

9 Customers wanting to opt out must inform Hydro Quebec within 30 days after receiving notice
10 that their meter will be replaced. Opt-out customers will have a non-communicating meter
11 installed and will be charged a \$98 Initial Installation Charge and a \$17 monthly meter reading
12 charge.

13
14

15

16 40. What opt-out fee is being sought by the utility in Kauai?

17

18 **Response:**

19 The Kaua'i Island Utility Cooperative has applied for approval of a \$10.27 monthly charge to
20 customers that choose to opt-out of the wireless smart meter.

21
22

23

24 **Special customers**

25 41. Under the regime contemplated by the present Opt-out Application, will FBC
26 waive the opt-out fee for customers who suffer from a disability that prevents
27 them from accessing environments where exposure to radio-frequency emissions
28 is ongoing and incessant?

29

30 **Response:**

31 No, FortisBC will not waive the radio-off fee. There is no provision in the opt-out principles set
32 out in Order C-7-13 for such an exclusion and such an exclusion would be contrary to the



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1 principle that “[t]he incremental cost of opting-out of the AMI program will be borne by the
2 individual choosing to opt out”.

3 FortisBC notes that it should also not be taken to agree with the premise of the question. The
4 Commission said on page 137 of its AMI CPCN Decision: “However, based on the scientific
5 evidence in this Proceeding, the Panel is not persuaded that there is a causal link between RF
6 emissions and the symptoms of EHS”.

7
8

9

10 42. Under the regime contemplated by the present Opt-out Application, will FBC
11 waive the opt-out fee for customers who are under some degree of financial
12 hardship?

13

14 **Response:**

15 No, FortisBC will not waive the radio-off fee in this circumstance. There is no provision in the
16 opt-out principles set out in Order C-7-13 for such an exclusion and such an exclusion would be
17 contrary to the principle that “[t]he incremental cost of opting-out of the AMI program will be
18 borne by the individual choosing to opt-out”.

19 However, FortisBC’s practice is to work to find mutually acceptable payments arrangements
20 with customers that are having difficulty paying their bills, and it will follow that practice in this
21 case as well.

22
23

24

25 **Nature of data**

26 43. Where data is manually downloaded from radio-off meters, what data (besides
27 usage information) is being collected and how is such data useful to FBC if it is
28 not collected in real time?

29

30 **Response:**

31 FortisBC will collect the same consumption and operational data that it collects for radio-on AMI
32 customers. This data is useful for radio-off customers for the same reasons it is for radio-on
33 customers as articulated in the original AMI CPCN application and approved by Order C-7-13.



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