



CONSULTATION DOCUMENT ON

The Bahamas Power and Light's Consumer Protection Plan

Issue Date: 29 May 2017

Response Date: 31 August 2017

ES 04/2017

Contents

1	Introduction	3
1.1	How to Respond	3
1.2	Confidentiality	4
1.3	Structure of the Document	4
2	Regulatory Framework for Consultations	5
3	URCA's Assessment of BPL's CPP	6
3.1	BPL's CPP Compliance with the Requirements in the EA	6
3.2	Adequacy of Standards Proposed in the BPL's CPP	11
3.2.1	Adequacy of Overall Standards	11
3.2.2	Adequacy of Individual Standards	12
4	Next Steps	18
4.1	Changes Required to the CPP	18
4.2	Consultation on BPL's CPP	19

1 Introduction

The Utilities Regulation and Competition Authority (URCA) is the independent regulator and competition authority for the Electricity Sector (ES) in The Bahamas. URCA's powers and functions are set out in the Electricity Act, 2015 (EA), which includes the power to issue regulatory and other measures to regulate the sector. Under the EA, URCA is responsible for approving a set of standards proposed by Public Electricity Suppliers for the protection of their electricity consumers, also known as consumer protection plans. This document sets out URCA's assessment and proposed revisions of the Bahamas Power and Light's (BPL) Consumer Protection Plan (CPP).

URCA issues this "Consultation Document on The Bahamas Power and Light's Consumer Protection Plan" to comply with Sections 40, 41, 42 and 43 of the EA, which require URCA to consult the public on the Consumer Protection Plan and other measures of public significance.

The objective of this Consultation Document is to:

- (i) Highlight the key elements of BPL's CPP;
- (ii) Set out URCA's assessment of the CPP; and
- (iii) Invite comments from stakeholders on URCA's review and proposed changes.

URCA has posed specific questions under this Consultation Document. URCA invites submissions to the questions posed under this Document. URCA may also take into consideration general submissions and comments on its assessment of BPL's CPP.

1.1 How to Respond

URCA welcomes written submissions and comments from interested parties with sufficient interest in matters set out in this Consultation Document. The written submissions and comments must be submitted to URCA by 31 August 2017.

The written submissions and comments should be submitted to URCA either:

- (i) by hand to the Chief Executive Officer, Utilities Regulation and Competition Authority, Frederick House, Frederick Street, Nassau, Bahamas; or
- (ii) by email to info@urcabahamas.bs; or
- (iii) by mail to P.O. Box N-4860, Nassau, Bahamas; or
- (iv) by facsimile to (242) 393-0237.

URCA will carefully consider all submissions and comments received before the deadline. URCA intends to publish all responses on the URCA website (www.urbahamas.bs) as soon as possible after the deadline.

URCA shall issue a Statement of Results and Decision. The Statement of Results and Decision will be published within 49 calendar days from the deadline for submissions.

1.2 Confidentiality

URCA may treat responses that are clearly marked “confidential” (in part or full) as being confidential. The submitter shall justify why the information submitted is considered confidential. URCA has the sole discretion to determine whether to publish any submission marked as confidential.

1.3 Structure of the Document

The remainder of this Consultation Document consists of the following parts:

- i) Section 2 describes the legal framework that allows URCA to issue this Consultation Document;
- ii) Section 3 provides URCA’s assessment of the CPP;
- iii) Section 4 discusses the next steps following this consultation; and
- iv) Appendix A provides BPL’s proposed CPP.

2 Regulatory Framework for Consultations

This section sets out the regulatory framework under which URCA has exercised its powers to issue this Consultation Document. URCA considers that the following sections require URCA to consult persons with sufficient interest in general regulatory measures.

Section 22 of the EA establishes URCA as the independent regulator of the ES and empowers it to exercise and perform its functions and power in accordance with the provisions of the EA and the URCA Act.

Section 37 of the EA provides that the primary role of URCA is the regulation of the electricity sector in accordance with the goals, objectives and principles underpinning the national energy and electricity sector policies. This section also provides that URCA, in the regulation of the sector, promote good utility practice and continuous improvement of all regulated activities.

Section 38(3)(a) of the EA provides that URCA may, for the purpose of carrying into effect the sector policy objectives, issue regulatory and other measures, including making determinations in accordance with Section 64 of the EA.

Section 41 of the EA establishes URCA shall allow a person with sufficient interest an opportunity to comment on measures that are of public significance. URCA will consider the comments received prior to introducing the regulatory measures and other measures. This document, as required in Section 41(3), details the standard procedures for seeking and receiving comments.

Section 42 of the EA provides that a regulatory measure is likely to be of public significance where it relates to electricity supply systems or services and can lead to one or more of the following:

- a) A major change in the activities carried out by URCA;
- b) A significant impact on persons carrying out activities in areas regulated by URCA;
- c) A significant impact on the public in The Bahamas.

In addition to the sections setting out URCA's general powers to consult the public on regulatory measures listed above, URCA is required to consult the public on any Public Electricity Suppliers' consumer protection plan. Section 40 of the EA states that URCA must publish the proposed consumer protection plan for public consultation before approving the plan. At the end of the public consultation process, URCA may require the Public Electricity Supplier to revise the consumer protection plan. URCA will follow the requirements set out in Section 40 for approving consumer protection plans.

BPL, as a Public Electricity Supplier, is required to submit a consumer protection plan for URCA's approval. URCA is required to consult the public on BPL's consumer protection plan before approving the plan.

3 URCA’s Assessment of BPL’s CPP

BPL submitted its proposed CPP to URCA on May 5th, 2017. This section provides URCA’s assessment of the CPP. URCA’s assessments is based on the CPP’s compliance with the EA (Section 3.1) and the adequacy of the standards proposed in the CPP (Section 3.2).

3.1 The CPP’s Compliance with the Requirements in the EA

URCA found that BPL’s CPP complies with most of the legal requirements listed in Section 40 of the EA. URCA considers that seven out of the eight requirements are included in the CPP. Table 3.1 provides a summary of the CPP’s compliance with the EA. This table determines whether the CPP complies with the requirement listed in Section 40 and provides URCA explanation on why the CPP complies or does not comply with the requirement.

Table 3.1: Summary of BPL’s CPP compliance with the legal requirements under the EA

Requirement under Section 40	Does BPL’s CPP comply with the requirement under Section 40?	URCA’s assessment
Include standards of service, quality and safety of electricity service and equipment provided	Yes	<p>BPL’s CPP includes standards of service, quality, and safety. Regarding standards of service, BPL has identified the Individual Service Standards it will comply with in Part 8 of the CPP (See section 3.2.2). This section describes the service standards and the service targets. Overall, URCA is satisfied with the levels of service BPL intends to provide at the individual level and with the ways these standards are presented in a summary table. However, the CPP does not provide Overall Service Standards (See section 3.2.1). BPL should include Overall Standards in its CPP to ensure customers, URCA, and BPL have information on the services BPL is providing.</p> <p>Regarding quality and safety, Part 4 of the CPP details the standards on power quality, such as the frequency and voltage limits. BPL’s voltage and frequency deviation range follows industry standard. However, the CPP does not mention specific standards or indicators used to measure service reliability. Any measure or indicator, and</p>

Requirement under Section 40	Does BPL's CPP comply with the requirement under Section 40?	URCA's assessment
		<p>its respective target, used to assess reliability should be included as an Overall Standard.</p> <p>Regarding safety, the CPP lists the different measures BPL and consumers can take to provide and have safe service. For example, Part 2 of the CPP describes how consumers must ensure that BPL has unrestricted access to its equipment for safety purposes. The CPP also provides information on how consumers are prohibited from tampering or interfering with any BPL equipment.</p>
<p>Include procedures for receiving and responding to consumers' complaints</p>	<p>Yes</p>	<p>BPL's CPP includes procedures for receiving and responding to consumers' complaints. Part 5 of the CPP establishes the processes for lodging complaints regarding billing, power quality and service interruption, damage of electrical apparatus and spoilage, tree trimming, and lack of street lightning.</p> <p>URCA is satisfied with the process that will be used to lodge complaints. In the CPP, BPL states it plans to set up a centralized call centre to accept call from consumers from any jurisdictions (page 14). Complaints will be lodged, handled, and followed up. Consumers can also submit written complaints for non-emergency purposes.</p> <p>Regarding billing complaints, URCA notes that while BPL offers consumers the possibility to reach the Consumer Relations Section, it fails to mention what is the phone number for this Section.</p> <p>Regarding power quality and service interruptions complaints, URCA notes that while BPL offers consumers the</p>

Requirement under Section 40	Does BPL's CPP comply with the requirement under Section 40?	URCA's assessment
		<p>possibility to connect to an Emergency Line, which URCA believe is adequate, it fails to mention this line's phone number.</p> <p>URCA is satisfied with the procedures for solving damage of electrical apparatus and spoilage, tree trimming and street lighting.</p>
Include procedure for resolving disputes with consumers	No	<p>Even though BPL's CPP includes a section on resolving disputes with consumers, the CPP does not provide detailed information about how BPL will seek to address these disputes. Moreover, URCA finds that BPL's statement <i>"In some instances, depending on the cost and research time to resolve a dispute, and given its materiality or other implications, BPL will use its discretion in the resolution of the matter"</i> is confusing and might seem arbitrary.</p> <p>URCA requests that BPL provide a more detailed process on how it will resolve consumer disputes.</p>
Include accelerated procedures for resolving disputes with customers related to billing	Yes	<p>BPL's CPP includes procedures for resolving disputes with customer related to billing. Part 6 of the CPP states that billing complaints are given additional consideration and describes the Customer Relations Unit will be in charge of resolving billing disputes.</p> <p>It should be noted that the section on Accelerated Dispute Resolution Related to Billing (page 18), does not provide a timeframe in which BPL will address billing disputes. URCA requests that BPL include the timeframe for solving billing disputes in the CPP.</p>

Requirement under Section 40	Does BPL's CPP comply with the requirement under Section 40?	URCA's assessment
<p>Include standards and procedures for terminating and restarting service</p>	<p>Yes</p>	<p>BPL's CPP includes procedures for terminating and restarting service. Part 3 of the CPP describes disconnection procedures and reconnection procedures. URCA believes that the list of circumstances that result in the disconnection of service (page 12) is complete and acceptable.</p> <p>The CPP also provides a detailed list of five of the methods BPL will use to inform consumers about the disconnection of their accounts. URCA believes this is a comprehensive list and is satisfied with the procedures to notify customers.</p> <p>URCA is also satisfied with BPL's acknowledgment that electricity is an essential service and tries to minimize the time a consumer is without electricity. This is proved by the CPP's statement that disconnection will be carried out on days that allow consumers to be reconnected within 24 hours of payment (page 12).</p>
<p>Include special termination and restating procedures for vulnerable customers who are unable to pay their electric bills and who satisfy eligibility criteria for assistance</p>	<p>Yes</p>	<p>BPL's CPP includes procedures for terminating and restarting service for vulnerable consumers. BPL distinguishes between vulnerability related to medical conditions and economic conditions.</p> <p>Regarding vulnerability related to medical conditions, BPL will identify vulnerable consumers based on medical assessments (letter from doctors) and flag the customer's account as a "Vulnerable Consumer Account". A vulnerable consumers' account will not be disconnected until the consumer, or his/her designee, is notified.</p> <p>URCA is satisfied with how BPL intends to deal with Vulnerable Consumers with</p>

Requirement under Section 40	Does BPL's CPP comply with the requirement under Section 40?	URCA's assessment
		<p>medical conditions. URCA finds that BPL's identification of vulnerable consumers with medical conditions is appropriate because it relies on a certified third party. BPL's disconnection procedure is also appropriate because it ensures the Vulnerable Consumer is informed about the disconnection of his/her account and allows sufficient time for he/she to make the necessary arrangements to avoid loss of supply.</p> <p>URCA finds that BPL's procedures to deal with other Vulnerable Consumers are vague. The CPP states that BPL will perform an economic assessment of individual who apply to be identified as "Vulnerable Consumer". Vulnerable Consumers may be afforded special disconnection considerations on a case by case basis. This is unacceptable because it does not specify what variables will be considered to determine the special disconnection procedures, making BPL's decisions seem arbitrary</p>
<p>Include procedure for amending the consumer protection standards adopted in the CPP when technological improvements or changes circumstances require</p>	<p>Yes</p>	<p>BPL's CPP includes procedures for amending consumer protection standards. Part 7 of the CPP states that whenever technological improvements impact both BPL and its consumers, BPL will perform a consumer impact assessment study to determine the long term best economic and safety interest of both BPL and its consumers. This impact assessment study will be used to make the appropriate changes to the CPP.</p> <p>URCA finds this statement shows BPL is committed to amending the consumer protection standards adopted in the CPP</p>

Requirement under Section 40	Does BPL's CPP comply with the requirement under Section 40?	URCA's assessment
		when technological improvements are required, as it is requested by the EA.
Include specific plans for dealing with vulnerable customer in accordance with international industry best standards	Yes	BPL's CPP includes specific plans for dealing with vulnerable customer in accordance with industry practice and best standards. Please refer to URCA comments on ' <i>Include special termination and restarting procedures for vulnerable customers who are unable to pay their electric bills and who satisfy eligibility criteria for assistance</i> ' on page 9 of this document.

Based on this assessment, URCA requests that BPL improve or include the following:

- i) Overall Standards
- ii) Information about the appropriate channels for consumer to reach BPL regarding emergencies and billing complaints;
- iii) Detailed information about BPL's procedure to solve consumer disputes; and
- iv) Information regarding the economic assessment to identify other Vulnerable Consumers (non-medical).

Question 1: Do you agree BPL's proposed CPP complies with the legal requirements stated in Section 40(2) of the EA?
If possible, please provide reasons in support of your response.

3.2 Adequacy of Standards Proposed in BPL's CPP

This section provides URCA's assessment of the adequacy of the standards in the CPP. The adequacy of standards was assessed based on good industry practices and BPL's capacity to comply with the proposed standards. URCA assessed the adequacy of Overall Standards (Section 3.2.1) and Individual Standards (Section 3.2.2). URCA also provides general comments on other standards proposed in the CPP (Section **Error! Reference source not found.**).

3.2.1 Adequacy of Overall Standards

URCA found that BPL's CPP did not set Overall Standards in the CPP. Overall Standards are standards that the utility aims to meet on average across quality and service, but do not

apply to individual consumers. Overall Standards are useful to customers and URCA to have information on BPL’s performance.

URCA therefore requests that BPL include Overall Standards in the CPP. Once Overall Standards are set and approved by URCA, BPL is expected to track its performance against the Overall Standards. This will improve the information that consumers, URCA, and BPL have on BPL’s service.

BPL should present the set Overall Standards in a table similar to the Standards of Service table in page 20 of the CPP. This ensures the Overall Service Standards are clearly identified and summarized in one table. For each standard, the CPP should include:

- i) Type of service; and
- ii) Minimum performance level of that service –usually set as a percentage target to measure performance or target index to measure performance.

BPL should consider including SAIFI, SAIDI, and other commonly reported standards.

Question 2: Do you believe agree with URCA’s assessment that the CPP does not have clear Overall Standards? Do you believe the inclusion of Overall Standards are necessary to promote and contribute to the protection of electricity consumers? What Overall Standards do you think BPL should adopt? If possible, please provide reasons in support of your response.

3.2.2 Adequacy of Individual Standards

URCA found that BPL set Service Standards that it intends to meet for every customer in the CPP. These Service Standards refer to Individual Standards, which are the minimum levels of service that a utility should meet for every consumer. URCA is satisfied with how BPL presents the Service Standards—as a table on page 20 of the revised CPP. However, BPL should re-name them from simply ‘Standards of Service’ to ‘Individual Service Standards’ to avoid confusions with Overall Standards (See Section 3.2.1.)

summarizes URCA’s assessment of the CPP’s Individual Standards. In the table, URCA states whether it considers the proposed Individual Standard is adequate, or not, and explains the reason behind its assessment. To determine the adequacy of the proposed standards, URCA analyzed BPL’s capacity to comply with the proposed standards and took into consideration the levels of service guaranteed by other peer companies in Barbados, Jamaica, and Trinidad and Tobago.

URCA qualified the proposed Service Standards in the following categories:

- i) BPL’s proposed standard is adequate and follows industry practice;
- ii) BPL’s proposed standard is adequate for the moment. However, BPL needs to work towards improving the proposed standard; and
- iii) BPL’s proposed standard is inadequate and needs to be modified.

Table 3.2: Summary of URCA’s Assessment on the Adequacy of the CPP

BPL’s proposed Individual Standard	BPL’s proposed target	Does URCA consider this an appropriate standard?	URCA’s assessment
Service activation	Within 3 working days	Yes	BPL’s proposed standard is adequate and follows industry practice. The proposed timeframe for activating service is similar in other jurisdictions, such as Jamaica and Trinidad and Tobago, which usually takes between 2 and 5 working days
Simple service connection to existing overhead infrastructure	within 5 working days (no charge for service connection)	Yes	BPL’s proposed standard is adequate and follows industry practice (between 5 and 12 working days)
Simple service connection to existing underground infrastructure	Customer Cost Estimate within 10 working days Connection within 21 working days following full payment	Yes	BPL’s proposed standard is adequate and follows industry practice
Complex Service Connection (Connections beyond 60 feet requiring service extensions)	Customer Cost Estimate within 21 working days following receipt of all required information needed for design Connection within 45 working days following full payment	Yes	BPL’s proposed standard is adequate and follows industry practice
Complex Service Connection (Connections requiring system reinforcements)	Customer Cost Estimate within 45 working days following receipt of all required	Yes	BPL’s proposed standard is adequate and follows industry practice

BPL's proposed Individual Standard	BPL's proposed target	Does URCA consider this an appropriate standard?	URCA's assessment
	information needed for design Connection dependent on works required to accommodate new loading		
Complex Service Connection – Developments, Subdivisions, or projects requiring site visits	Customer Cost Estimate within 60 working days following receipt of all required information needed for design Connection dependent on works required to accommodate new loading.	Yes	BPL's proposed standard is adequate and follows industry practice
Meter Reading (Frequency of Meter Reading)	100% of Residential Consumer Meters read every 3 months 100% of Commercial Consumer meters read every 2 months	Yes	BPL's proposed standard is adequate for the moment. However, BPL needs to work towards improving the proposed standard. BPL should also specify if this target in place is valid for the whole network, or could there be a differentiation for larger and smaller islands It should be noted that BPL is one of the utilities that takes longer to read its consumers' meters. In other jurisdictions, such as Jamaica and Trinidad and Tobago, utilities take between one or two months between every meter reading. URCA urges BPL to work towards shortening the frequency of meter reading.

BPL's proposed Individual Standard	BPL's proposed target	Does URCA consider this an appropriate standard?	URCA's assessment
Billing period	95% of Consumers in the Billing Period shall be invoiced for no more than 33 days	Yes	BPL's proposed standard is adequate and follows industry standard
Reconnection after disconnection for non-payment	Within 1 business day after required payment received by BPL	Yes	BPL's proposed standard is adequate and follows industry practice. Reconnection in other jurisdictions usually is carried out within 24 h
Wrongful Disconnection – Reconnection of a consumer account that was disconnected in error (i.e. customer not eligible for disconnection)	Reconnection within 4 working hours of notification by the consumer and verification by BPL. Compensation Offered - \$20.00 on application	No	BPL's proposed standard is inadequate. The CPP does not specify how consumers will be compensated, for example it does not specify if the compensation payment will be credited to the customer's account or a check will be issued in the customer's name. Also, BPL does not specify the time it will take to process the application for compensation
Outage Notices	All Planned Outages announced via the local media 48 hours in advance of scheduled works	Yes	BPL's proposed standard is adequate and follows industry practice. This compares well to other jurisdictions, for example in Barbados BL&P is required to provide a 3 days' outage notice to its consumers
Trouble Call Dispatched to Emergency Crews	Within 24 hours of receipt of verified trouble call unless specific arrangements are made with the consumer to address otherwise	Yes	BPL's proposed standard is adequate for the moment. However, BPL needs to work towards improving the proposed standard. Other jurisdictions have a shorter emergency response timeframes, such as JPS which has a 12-hour time response

BPL's proposed Individual Standard	BPL's proposed target	Does URCA consider this an appropriate standard?	URCA's assessment
			URCA requests that BPL adopt a clearer response procedure. The current version of the CPP uses words like “normally” and “unless there is a dangerous situation” which do not provide a clear protocol to ensure the safety of the consumer and avoid catastrophic damage to consumers’ equipment and/or loss of life
Voltage Complaints – Resolution of High/Low Voltage complaint	Acknowledgement within 5 days Review within 15 Days Resolution within 60 Days	No	BPL's proposed standard is inadequate. URCA finds that the response times are too long to address voltage irregularities, especially high voltage issues. In addition, BPL's procedures to respond to voltage complaints are vague. BPL should improve its response procedures because high-voltage electricity can damage household equipment and pose safety risks to consumers. BPL's response time to voltage complaints compares poorly with other Caribbean utilities' response times. For example, in Trinidad and Tobago, T&TEC visits the household experiencing voltage irregularities within 24 hours and corrects the irregularities within 15 days
Billing Complaints	Acknowledgement within 5 days Response within 15 days to advise resolution or whether additional	Yes	BPL's proposed standard is adequate and follows industry practice. Other jurisdictions, such as Jamaica and Trinidad and Tobago, have the same time frame for responding and solving billing complaints

BPL's proposed Individual Standard	BPL's proposed target	Does URCA consider this an appropriate standard?	URCA's assessment
	testing/investigation is required.		
Fault Repair – On a single consumer service (after review by Emergency Services and call passed for further action)	Within 12 hours	Yes	BPL's proposed standard is adequate and follows industry practice. The timeframe set for fault repair follows industry practice for the Caribbean, which is usually 10 to 12 hours
Fault Repair System – Time to restore supply to multiple consumers affected by a Distribution System Fault	Within 24 hours	Yes	BPL's proposed standard is adequate for the moment. However, BPL needs to work towards improving the proposed standard. It should be noted that other jurisdictions have shorter response time for repairing faults in the system, which is usually is between 10 to 12 hours
Response to Consumer Claims for Damage (Acknowledgement)	Acknowledgement returned to consumer on completed submission within 5 working days	Yes	BPL's proposed standard is adequate and follows industry practice. Other companies in the Caribbean, such as JPS (Jamaica), have the same response time (5 days)
Response to Consumer Claims for Damage (Resolution)	Review completed and initial response provided within 2 months of receipt of the completed consumer claim	Yes	BPL's proposed standard is adequate for the moment. However, BPL needs to work towards improving the proposed standard. It should be noted that companies in the Caribbean, such as JPS (Jamaica), have a shorter response time (30 days)

URCA requests that BPL improves the CPP by:

- i) Shortening the response time and improving the procedures for responding to emergencies and voltage complaints;

- ii) Implementing an automatic compensation system instead of a claim-based system. BPL should set an automatic payment system that does not require consumers to file claims when they have suffered a breach of standards. The CPP should provide the estimated time BPL will take to compensate consumers; and
- iii) Linking the body of the text to Service Standards as required in the main body of the CPP. Many of the elements of the CPP, such as voltage, are addressed in the main body, then again in the Service Standards table. The main body should specify that Individual Service Standards for voltage are in the table.

Question 3: Do you believe BPL's proposed minimum levels of service (Individual Standards) are adequate? Do you believe the proposed Standards promote and contribute to the protection of electricity consumers?
If possible, please provide reasons in support of your response.

It should be noted that for this CPP, URCA has allowed BPL to adopt Individual Standards instead of Guaranteed Standards. Guaranteed Standards are the minimum levels of service that a utility should meet for every consumer. The breach of these standards usually entails compensatory payments to the consumer. BPL should use the setting of Individual Standards as a baseline to develop Guaranteed Standards for the next CPP. URCA believes this progression from Individual Standards to Guaranteed Standards is standard practice for early-stage regulatory regimes and provides BPL and opportunity BPL to fully assess the levels of service that it plans to guarantee

4 Next Steps

This section sets out the next steps URCA, BPL and interested parties in the consultation process should take. Section 4.1 summarizes the changes BPL needs to make for URCA to approve the CPP. Section 4.2 details what URCA will do after the end of the process.

4.1 Changes Required to the CPP

URCA requests that BPL include the changes listed in section 3, namely:

- i) Including Overall Standards
- ii) Providing more detailed information about the appropriate channels for consumer to reach BPL regarding emergencies and billing complaints, its procedure to solve consumer disputes and assess Vulnerable Consumers (non-medical)
- iii) Shortening the response time for responding voltage complaints
- iv) Implementing an automatic compensation system instead of a claim-based system; and
- v) Linking the body of the text to Service Standards as required in the main body of the CPP.

4.2 Consultation on BPL's CPP

After the period for submissions and comments closes, URCA will carefully consider all submissions and comments and shall issue its Statement of Results and Final Determination.

The Statement of Results and Final Determination will be issued within 49 calendar days from the deadline for submission.

Appendix A



BAHAMAS POWER AND LIGHT COMPANY LTD.

CONSUMER PROTECTION PLAN FILING TO THE UTILITIES REGULATION AND COMPETITION AUTHORITY

5 May, 2017

Version: Draft 3.0

Table of Contents

PART 1: INTRODUCTION

- Purpose..... **Error! Bookmark not defined.**
- Definitions..... 4

PART 2: STANDARDS OF SERVICE QUALITY AND SAFETY

- Description of Service..... 6
- Service Applications..... 6
 - Required Documents to Support Application..... 7
 - Cost of Connection 7
 - Connection of Supply..... 8
 - Renters’ Accounts for Service..... 8
 - Temporary Supplies 8
- Right of Refusal..... 8
- Security Deposits 9
- Vulnerable Consumers 9

PART 3: RATES AND BILLINGS

- Electricity Rates 10
 - Rate Adjustments 10
 - Rate Affordability..... 10
- Meter Accuracy 10
- Billing 10
 - Estimate Readings 11
- Payment Options 11
 - Disconnections..... 12
 - Reconnections 13

PART 4: POWER QUALITY

- Power Quality 13
 - Voltage Deviation 14
 - Frequency Deviation..... 14

CONSUMER PROTECTION PLAN
BAHAMAS POWER AND LIGHT COMPANY LTD.

○ Transient Voltages	14
PART 5: CONSUMER COMPLAINTS	
● Lodging Complaints	14
● Consumer Complaints – Billing	15
● Consumer Complaints – Power Quality and Service Interruption	15
● Consumer Complaints – Damage of Electrical/Electronic Apparatus and Spoilage	16
○ Consumer Claims Process	16
● Consumer Complaints – Tree Trimming	17
● Consumer Complaints - Street Lighting	17
PART 6: CONSUMER DISPUTE RESOLUTION	
● Consumer Dispute Resolution	17
● Accelerated Dispute Resolution Related to Billing	18
PART 7: AMENDING CONSUMER PROTECTION STANDARDS	
● Procedures for Amending Consumer Protection Standards	18
PART 8: STANDARDS OF SERVICE	
● Standard of Services	19
● Index of other Services	21
APPENDIX 1 – Consumer Summary by Island	22
APPENDIX 2 - Electrical Installation Approval Form	23
APPENDIX 3 - BPL System Generated Application Form	24
APPENDIX 4 - Landlord Authorization Form	25
APPENDIX 5 - Tarriff Schedule	26
APPENDIX 6 - BPL Bill Pay Sites	27

PART 1: INTRODUCTION

Purpose

Bahamas Power and Light Company Ltd. (BPL) is required to submit to the Utilities Regulation and Competition Authority (URCA) for approval a Consumer Protection Plan pursuant to the Electricity Act, 2015 (Act), Section 40. In compliance with the Act, the following plan is submitted to URCA for its approval.

BPL provides services to more than 108,000 consumers throughout 23 service territories within the Commonwealth of the Bahamas with 74% of these consumers residing on the Island of New Providence (see Appendix 1). BPL is committed to providing its consumers with exceptional service which results in customer satisfaction.

Definitions

- **Act** means the Electricity Act, 2015.
- **BPL** means Bahamas Power and Light Company Ltd.
- **Demand Charge per kVA** means a billing mechanism used to recover the cost of providing transmission and distribution service to non-residential consumers with a maximum load greater than 10kVA.
- **Easements** mean the right to use and/or enter onto the real property of another without obtaining ownership of it.
- **First Tier Electricity Units** mean that in some classes of utility consumers, rates for electricity usage may change for a portion of the units used, depending on the amount of power consumed. The first tier represents the first portion of units used for the particular class of consumer.
- **Fuel Charge** means variable component of the electricity bill which covers all costs associated with the fuel used for the amount of power consumed.
- **Generator Feed-Through Arrangement** means a written agreement made with the consumer for the installation of a single generator to a building (most often with respect buildings with multiple occupants such as a commercial, office or apartment building) through a single transfer switch, resulting in the electrical meters being powered either by BPL supply or by the consumer's generator.
- **High Voltage Overhead Mains** means pole mounted power lines at voltages over 600 volts.
- **Instrument Transformers** mean high accuracy class electrical devices used to isolate or transform voltage or current levels (e.g. voltage transformers or current transformers). In metering, they may be used to reduce current or voltage levels to a safe, readable value for the electrical meter to comprehend.

CONSUMER PROTECTION PLAN
BAHAMAS POWER AND LIGHT COMPANY LTD.

- **Low Voltage Cable Feeds** mean underground service cables from the utility's point of supply (such as a transformer, overhead line or service pillar) to the consumer's electrical service (i.e. main switch or transfer switch).
- **Low Voltage Overhead Power Lines (Mains)** mean pole mounted power lines at voltages less than 600 volts.
- **Rate Reduction Bond Fee** means the fee imposed by BPL on consumers in accordance with Section 18(4) of the Act and which is calculated per unit usage by the consumer, subject to periodic adjustments in accordance with Section 13 of the Electricity Rate Reduction Bond Act.
- **Rate of Return on Capital** means the profit to be received from investments should be equivalent to at least the Bahamian Prime Rate.
- **Security Deposit** means a payment collected by BPL from the consumer to mitigate any actual or perceived credit risk which BPL assumes in providing service to the consumer.
- **Services** means the provision of electricity by BPL to consumers.
- **Single-Phase Voltage** refers to a two wire or three wire AC circuit arrangement where one wire is the neutral wire and the other wire(s) is the hot or live wire. This arrangement is typically used for lower loads such as in residential services.
- **System Frequency** means the frequency of the oscillations of alternating current (AC) in an electric power grid transmitted from a power plant to the end-user.
- **Three-Phase Low Voltage** refers to a four wire AC circuit arrangement where one wire is the neutral (reference) and the other three wires are the hot or live wires. This arrangement is typically used for higher circuit loads such as in commercial or industrial accounts.
- **Transient voltages** means momentary fluctuations (less than one second in duration) in the voltage of a circuit. These may be spikes, surges, dips or swells.
- **Tree Trimming** means directed pruning of tree limbs back to the main trunk of the tree away from power lines.
- **Underground Services** means cables from the utility's point of supply (such as a transformer, overhead line, service pillar) to the consumer's electrical service (i.e. main switch or transfer switch) which are buried under the ground along their length.
- **URCA** means the Utilities Regulation and Competition Authority.
- **Vulnerable Consumers** means consumers who require protection against disruption or termination of electricity supply due to low income, being of pensionable age, disability, chronic illness or other vulnerabilities.

- **Wayleave Management Operations** mean works carried out to maintain proper access to privately owned land for which consent to access by BPL has been granted by written agreement. Works may involve, but is not limited to, tree cutting/felling, brush/bush removal and installation of bollards.
- **Working Days** means Monday to Friday from 8 am – 4:30 pm, excluding public holidays.
- **Wrongful Disconnection** means the disconnection of services to an electricity account not eligible for disconnection as specified in the Disconnection section of this Consumer Protection Plan.

PART 2: STANDARDS OF SERVICE QUALITY AND SAFETY

Description of Service

BPL provides single-phase or three-phase low voltage services at the voltage and size requested by the consumer. In certain instances, BPL may provide high or distribution level voltage services to consumers. Consumers are required to request services by submitting an Electrical Specification Form (see Appendix 2). BPL reserves the right to periodically amend the Electrical Specification Form.

BPL will maintain ownership of all equipment up to and including the meter, except in certain circumstances (for example, generator feed through arrangements and special low voltage cable feeds) as agreed in writing. Consumers must ensure that unrestricted access to its equipment is granted to BPL for the purpose of safety, network management and routine or after fault maintenance. All BPL equipment must be free from obstruction at all times. Consumers are prohibited from tampering with, adjusting or otherwise interfering with any BPL equipment.

Any electrical equipment beyond the metering point (including the meter can and connections behind the meter) shall be the property of the consumer. The consumer must ensure that all electrical apparatus within their control remain in a state of good repair, properly weatherproofed and meet all the criteria and specifications as set out in the appropriate electrical codes identified by the Ministry of Works.

In the event that a consumer requests a specific voltage that is unavailable in the particular area, BPL will inform the consumer as to the voltages that are available and will recommend an appropriate solution. Alternatively, the consumer may be requested to pay the cost of providing the voltage should BPL determine that it is practical in the particular area. The normal voltages provided by BPL throughout its service territories are listed in the table below.

Description	Voltage Phase – Neutral (Volts)	Voltage Phase – Phase (Volts)
Single Phase Two Wire	120	N/A
Single Phase Three Wire	120	240
Three Phase Three Wire	120	208
Three Phase Four Wire	120	208
Three Phase Four Wire	277	480

Service Applications

Application for services at a new installation, or for the addition or modification to an existing installation, shall be made in person by the owner or occupant of the premises at a BPL Consumer Service Center. An Application for Supply Form will be generated during the visit (see Appendix 3), which must be signed by

the applicant. An Electrical Specification Form (in duplicate) (see Appendix 2) must be completed by the consumer's licensed, certified electrician (single or three phase as per the type of installation) and submitted to the Building Control Section of the Ministry of Works for approval before the commencement of any works to provide services. The Electrical Specification Form will subsequently be forwarded to BPL after the relevant approvals are granted by the Ministry of Works. The specifications will then be reviewed by BPL and the method of connection determined. A listing of certified single and three phase electricians can be found on the BPL website.

At the time of application, BPL provides the consumer with information on its services, current rates and billing, and other associated offerings and charges to ensure that the consumer is fully aware of the terms and conditions of the services. This information as well as the Guaranteed Standards of Services is also made available through hard copy at all Consumer Service Centers and are published on BPL's website. The information is also provided upon request to the consumer, free of charge. Information pertaining to the description of the consumer's individual service (voltage level, service capacity, billing multipliers etc.) is also provided to the consumer at the time of application. The consumer may be required to acknowledge this information by signing a copy of the service level agreement for BPL's record.

Required Documents to Support Application

The applicant must provide a government issued photo identification such as a passport or, driver's license AND a National Insurance Card. Businesses applying to open an account must provide:

- An original letter of request for services on the company's letterhead. The letter must be signed by two authorized signatories, one of whom must be a Director of the company. The company's seal should also be affixed to the letter.
- Government issued photo identification of each authorized signatory
- A copy of the Memorandum and Articles of Association
- Copy of the company's Certificate of Good Standing
- A copy of the most recent Annual Statement filed with the Registrar General's Department or a Certificate of Incumbency
- VAT Certificate of Registration (if applicable)

All the above documents, along with the Installation Approval, Occupancy Certificate and the Security Deposit Payment must be brought by one of the authorized signatories to a representative at one of BPL's Consumer Service Centers.

Cost of Connection

Upon completion of the review of the Electrical Specification Form, BPL will determine the cost to the consumer for the requested services.

- Overhead service requests under 60 amps and within 60 feet of existing and available low voltage overhead power lines are provided without a charge to the applicant.
- Overhead services or extensions over 60 amps and beyond 60 feet of existing and available low voltage overhead mains or extensions from existing and available high voltage overhead mains are provided at a charge to the applicant.
- Where an applicant or a number of applicants require an extension along a public roadway, BPL may prorate the cost of service among the expected number of prospective applicants, provided the lot owners make written commitments accordingly. If the anticipated revenue is estimated by BPL to be sufficient to provide an adequate return on capital, BPL may contribute up to one third of the high voltage mains cost.

- Where underground services are required, the entire cost is borne by the applicant.
- Developers of new subdivisions, private tracts of land, or other developments are responsible for the full cost of the infrastructure required within the development necessary for the services to the individual lots of the subdivision. Additionally, the developer bears the cost of providing the services to the subdivision or tract of land as a whole. The developer is further responsible for the installation of street lights (or the cost thereof) within the development.
- Easements must be granted by the applicant to BPL in writing before the installation of poles, guys, lines/cables, sub-stations or other works needed for the extension.

Connection of Services

The connection of the services is subject to approval of the installation by the Ministry of Works as evidenced by an executed Electrical Installation Approval Form (see Appendix 2) and a Building Occupancy Certificate (where applicable), the approval of the installation by BPL, the completion of a Supply/Service agreement between the applicant and BPL, and the payment of the applicable Security Deposit.

Renters' Accounts for Services

A new tenant moving into a rental property must provide a signed copy of a BPL Landlord Authorization Form (see Appendix 4) providing information on the property, the name of the last tenant and the date the last tenant vacated the property, and the name of the new tenant and the date that tenant moved in. The Tenant must also provide:

- Government issued photo identification
- National Insurance Card
- Copy of the lease agreement or proof of payment of first month's rent
- Work Permit or Permanent Residency Card and National Identification Number from Overseas Territory or Home Country (if applicable)

Temporary Services

Temporary services accounts are granted for construction purposes only and should only be opened for a period of 6 months. The applicant's licensed electrician or electrical contractor must install a meter can, and the switch and plugs required. The contractor can then arrange for the installation to be inspected by the Building Control Department of the Ministry of Works. If approved, a Temporary Supply of Electricity Certificate will be issued bearing the permit number. The applicant must bring this certificate, a government issued photo identification card, and two current references (including phone contacts of the signatories) to BPL at the time of paying the applicable security deposit. If a business is opening the temporary account, the other requirements for a business account also apply.

Temporary services should not be connected to the permanent wiring in a building, which must be inspected prior to receiving services. A security deposit fee is also required for temporary services and a connection fee may apply if the service location is fed by an underground cable or the overhead service is more than 60 feet away from existing and available low voltage overhead mains.

Right of Refusal

BPL will make every effort to provide services to applicants within its service territory. There are however instances when the services, or the type of services required is beyond the company's capability to provide. In such circumstances, BPL reserves the right to refuse to provide services in the event:

- The technical requirements (voltage requested, loading required) are beyond the capability of BPL within one of its service territories to provide and/or beyond or outside of the services offerings of the BPL.
- The history on the account(s) of the individual or business shows a history of delinquency, account disconnections, tampering and/or security deposit forfeitures.

Security Deposits

All postpaid accounts for electricity services are subject to the payment of a security deposit before the provision of the services. BPL will indicate to the consumer, upon application for the services, the amount of the security deposit and all terms regarding the deposit. Historical data is used to calculate the deposit for services being reinstated or transferred to a location with previous service. For new installations, the data provided by the consumer's electrician on the electrical specification form is used to calculate the security deposit. Past payment history with BPL or the Bahamas Electricity Corporation may be used in this assessment, as well as data from other sources. The type of property (dwelling home, temporary housing/apartment etc.) may also impact the security deposit calculation. In all cases BPL will inform the consumer of:

- The level of the security deposit and the manner in which the deposit was calculated.
- How the deposit will be kept and the conditions under which the deposit may be forfeited, or repaid.
- The process to apply for the return of the security deposit.
- The terms for refunding the security deposit (or remaining balance) within two weeks of the termination of the services.

The security deposit is non-transferable and will not accrue any interest over the life of the services. The deposit calculation is based on twice the expected average monthly charge (including fuel) of the account. The minimum security deposit charge on any account is B\$50.00. The security deposit will be augmented, if applicable, by a credit risk factor as shown below.

- No issues or concerns – 1.0
- Past Tampering History – 2.0
- Temporary/Winter Residents or Transient Account Holders -2.0
- Poor Payment History – 1.5
- Access Control Problems/Issues – 1.5

If multiple risk factors apply, the single factor with the higher rating will be used (i.e. the risk factors will not be compounded).

Example: Security Deposit Calculation

$$2 \times \text{Average Monthly Billing} \times \text{Credit Risk Factor (if applicable)}$$

In the event that a consumer's account is suspended by BPL due to non-payment and the security deposit has been applied to cover the arrears on the account, the account holder is required to reestablish the security deposit in order to restore the services. The security deposit amount may be reevaluated given account history and credit risk, or to reflect changes in the rate since the creation of the account.

Vulnerable Consumers

During the application process, or at any other time, vulnerable consumers with a medical condition should indicate to the processing agent that the application is being submitted for a residence or business with a vulnerable consumer. The application must be accompanied by a letter from a medical doctor,

confirming the affiliation of the residence or business with a vulnerable consumer. The account will be identified in the system as a **Vulnerable Consumer Account**. Consumers are required to renew this status annually by submitting an updated letter from the medical doctor.

Any consumer who falls within the definition of a vulnerable consumer, other than those with a medical condition, may make application to BPL to be identified as a Vulnerable Consumer. BPL will conduct an economic assessment to determine whether the applicant qualifies as a vulnerable consumer. The economic assessment may include an evaluation of the consumption level on the account. BPL may also require the consumer to provide supporting documents, such as a referral letter from the Department of Social Services or any other relevant government agency.

PART 3: RATES AND BILLINGS

Electricity Rates

The rates and charges for services supplied by BPL are those set forth in the approved Tariff Schedule (see Appendix 5) and include a base rate which may be tiered, a rate reduction bond fee, the fuel charge and a demand charge per kVA (where applicable). The revenue raised by BPL shall be sufficient to cover its operational and fuel expenses, pay its long and short term debt and interest, maintain its covenants, and create and maintain a reserve fund.

Rate Adjustments

BPL may make application to URCA for a rate adjustment where it is necessary to recover the cost of necessary system upgrades or reinforcements due to unforeseen circumstances or circumstances that will otherwise improve operational efficiencies which may reduce cost.

Rate Affordability

As BPL is not a profit driven organization, rate of return is not considered a component of the electricity rate. One objective of the components of the electricity rate is to place BPL on a solid financial footing, while enabling it to properly service its consumers. BPL wishes to ensure that all consumers have access to electricity, regardless of their financial circumstances, and has purposely priced the cost of the first tier of electricity units at a discounted level.

Meter Accuracy

Meter performance tests are performed by the manufacturer and a test certificate is provided for each meter, which is retained by BPL. The percentage error on any meter used by BPL for the measurement of power consumed does not exceed 2%. Local testing of meters for verification of meter accuracy, as indicated on the performance certificate, is conducted on all meters prior to installation for commercial accounts, and on at least 10% of all residential meters prior to installation. Additionally, all meters removed from the system are tested to ensure that the accuracy of the meter was within the specifications up to the time of removal from service.

All commercial accounts using instrument transformers have additional accuracy ratings (error). The full metering system, including the instrument transformers, is tested in the field to ensure accuracy within the stated 2% error.

Billing

Bills to all consumers are calculated at the approved rates using the readings provided by the appropriate type and class of metering apparatus and any applicable multiplier. The actual reading on the face of the meter takes precedence over any other billing data (e.g. transmitter readings), provided no unauthorized modification has been made that impacts the meter readings. Meters are read and accounts are billed every 28 to 32 days according to their assigned route and cycle. Consumers have 21 days after the invoice date to pay the stated amount. After the expiration of the 21 days bills are considered overdue and the account may be subject to a late payment fee and/or disconnection of the services.

Estimate Readings

Where, due to either meter or remote transmitter failure, lack of access or any other reason, actual readings from the meter are not received, an estimate of the consumer's consumption for the billing period may be used to calculate the bill. The estimate for the consumption may be based on the:

- Average consumption of the consumer at the location for the past 12 month period;
- Actual consumption of the consumer at the location for the prior three month period; or
- Actual consumption of the consumer at the location during the same billing period in the prior year.

It shall be clearly indicated on the consumer's billing that the consumption used in the calculation of the billing was an estimated value. The consumer should also be easily able to determine that the consumption estimate is in line with the consumption pattern through the use of past consumption data normally displayed on the billing.

If an estimate consumption figure is used to calculate a billing for two or more periods, an investigation is initiated to determine the reason why the actual consumption value was not obtained. On completion of the investigation, the consumer is advised as to the reason for the estimate billing and the corrective action taken.

Payment Options

In New Providence, consumers may pay at our Main Office location at Blue Hill & Tucker Roads, at our Marathon Mall location. In the Family Islands, payments can be made at our Local Family Island Office or the relevant payment center (see Appendix 6). Payments are accepted at these locations in cash, check, or by credit card.

Payment can also be made on our website at <https://iwr.bahamaselectricity.com/WebPayments> or using our Telephone Bill Pay Service (242) 302-1130 using a valid major credit card. Consumers can visit the following commercial banking institutions to make payments or make payments on their electricity accounts through the bank's websites.

- RBC Royal Bank
- Scotiabank (Bahamas) Limited
- Bank of The Bahamas
- CIBC FirstCaribbean International Bank
- Commonwealth Bank
- Fidelity Bank (Bahamas) Limited

Disconnections

All consumers are required to pay their utility bills in full each month on or before the due date indicated on the bill. Any postpaid consumer whose account enters into a thirty day arrears will be subject to disconnection. Additionally, such a consumer may be required to accept pre-paid service, once available, prior to the reconnection of the service. All disconnections shall be carried out on days that allow the consumer to be reconnected within 24 hours of payment (typically Monday through Friday) between the hours of 7:00 am and 3:00 pm, thereby giving the consumer sufficient time to pay the outstanding balance and be eligible for reconnection. BPL assesses a fee of \$10.00 for a service visit with intent to disconnect for any residential account. Similarly, a fee of \$15.00 is charged for a service visit with intent to disconnect at a commercial account location.

As BPL is aware that electricity is an essential service, every effort will be made to notify consumers prior to the issuance of a disconnection work order. BPL uses several methods to notify consumers with delinquent accounts or those that are flagged for disconnection in our processes.

- **Monthly Billing** – Each month the consumer’s bill will indicate the total amount owed, separating that amount into the current month’s billing and the total delinquent amount.
- **Door Hangers** – BPL may deliver notices through the use of ‘door hangers’. These cards, which are left at the consumer’s residence, show the consumer account number and the delinquent amount. It notifies the consumer that a disconnection of the account is pending.
- **Automatic ‘robo’ Calls** – BPL’s IVR systems are capable of carrying out notification of delinquency by telephone calls. This system is dependent however, on the consumer providing and maintaining an up to date, active phone contact.
- **Email notification** – BPL’s systems are capable of sending an email notification to consumers, providing the actual monthly billing and disconnection notice. This system is also dependent on consumers providing and maintaining an up to date, active email account to the company.
- **Advertisements in the Media** – BPL uses advertisements in daily newspapers and on radio stations to advise to its consumers that outstanding electricity arrears should be paid in full to avoid the disconnection of the supply. The advertisement may also advise the consumer that they should come in to make payment arrangements, where possible, to avoid disconnection.

If the service is disconnected, the BPL representative leaves a notice at the residence, informing the consumer of the disconnection and the requirements to have the service restored. The notice, which is bright yellow in color, will be left either at the point of disconnection, that is the consumer’s main switch, or at the front door.

BPL may disconnect the service to consumers or accounts in the following circumstances:

- Non-payment of accounts 30 days in arrears;
- Where there is a safety violation or concern – (e.g. uncontrolled access to live electrical wires, busbars or components, outdoor installations not sufficiently weatherproofed or where there is restricted access to BPL service equipment);
- Where there is a confirmed case of meter or installation tampering;
- Temporary service accounts active beyond the allotted timeframe or being used for permanent residences; and
- Unauthorized use of the supply (e.g. consumer distribution of services to other structures not approved or sub-metering).

Disconnection of Service to Vulnerable Consumers

BPL will make an attempt to advise the consumer by telephone or through the use of door hangers of the need to make urgent payment of the overdue balance, indicating the projected date of disconnection of the service. This allows the consumer to make arrangements to pay the bill, seek assistance from the relevant government agency, or take such other necessary steps given their circumstances. If a work order is issued for the disconnection of the service, the Vulnerable Consumer Account status of the account appears on the work order. The disconnect work order will not be issued until personal contact is confirmed with the consumer or a designee. The disconnecter will also communicate directly with the consumer before taking any action.

Vulnerable Consumers, other than those with a medical conditions, may be afforded special disconnection considerations on a case by case basis. Any special arrangement made shall expire after 6 months unless additional information is presented which will warrant the extension of the vulnerable status of the account. Vulnerable Consumers who seek the assistance of any relevant government agency such as Social Services Department will be assisted by BPL. BPL will respond to requests for information from such relevant government agency as required.

Reconnections

All consumers disconnected as a result of nonpayment must pay all, or make arrangements to pay all overdue amounts prior to reconnection. A reconnection fee of \$20.00 will be charged. Where payments are made and verified at a BPL Consumer Service Center, through BPL's website or using BPL's telephone bill pay service, BPL will undertake to have the service reconnected within 1 business day. For a standard reconnection, if the outstanding amount is paid by 12:00 noon, BPL will undertake to have the service reconnected on the same day. Payments made through other centers, such as local banks, payment companies or collection agencies, may not be communicated to BPL in a timely manner which might delay the reconnection of service.

BPL may enter into payment arrangements with its consumers who are unable, after being disconnected, to pay the full outstanding amount. The terms of the arrangement will be agreed upon between BPL and the consumer on a case by case basis. During the term of the arrangement, the consumer must pay all new bills in full and ensure the payment of all outstanding amounts within the agreed timeframe. Consumers who default on an arrangement may not be eligible for further payment arrangements.

PART 4: POWER QUALITY

BPL seeks at all times to provide quality electricity to its consumers. Any electrical service, however, may be subject to power quality concerns such as voltage deviations, transients, and outages of the supply. Electrical and electronic devices may be susceptible to such power quality issues. Consumers are encouraged to take the necessary steps or install the required devices to safeguard their equipment against malfunction or damage. Where applicable, consumers should consider insuring their equipment to mitigate their losses.

Voltage Deviation

The normal voltage provided to consumers is as stated in the service proposal from BPL to the consumer at the time of the application for service. The voltage under normal system operation will be allowed to deviate by a value not to exceed +/- 6% of normal. BPL will take corrective action to return the voltage within the allowed range up to and including the temporary disconnection of the service to ensure safety. The consumer should notify BPL in all cases where there is a concern about the voltage level. The table below lists the upper and lower voltage limits for the various voltages offered by BPL.

Voltage	Lower Limit	Upper Limit
120 Volt Single Phase L-N	113	127
120/240 Volt Single Phase L-L	225	254
120/208 Volt Three Phase L-N	113	127
120/208 Volt Three Phase L-L	195	220
277/480 Volt Three Phase L-N	260	293
277/480 Volt Three Phase L-L	451	509

Frequency Deviation

The declared system frequency within BPL's jurisdiction is 60 Hertz (Cycles/Second). The frequency is allowed to deviate under normal operation of the network to a maximum value of +/- 2.0% of normal. Outside this range, BPL shall take corrective action to address the deviation. Such action may include the temporary disconnection of the supply.

Transient Voltages

Transient voltages including surges, swells, spikes or sags, are very brief fluctuations (less than one second) in the voltage outside the normal range. Transients can be caused by lightning strikes, electrical equipment or switching loads. Transient voltages caused by lightning can be transmitted over power lines, telephone lines, cable television wires/data lines and external antennae. Switching of loads on the power system by the utility, or of devices in a consumer's home or business such as air conditioners, freezers, refrigerators, printers or elevators can all cause these transient voltages. Electronic equipment may be sensitive to transient voltages and BPL recommends the use of suitable suppression or conditioning devices in order to safeguard against damage or loss. Other factors affecting whether equipment may be damaged as a result of transient voltages include the integrity of the consumer's grounding and wiring connections, the type and adequacy of protective devices used and the design of the equipment itself. BPL does not accept liability or responsibility for damage to any equipment as a result of transient voltages.

PART 5: CONSUMER COMPLAINTS

Lodging Complaints

BPL has plans to shortly establish a single call center which will accept all calls to the company from its consumers in any of its jurisdictions. Currently, there are mechanisms in place to allow the consumer to communicate any issue to BPL and receive the requisite attention. Incoming consumer complaints are directed to the responsible area for call logging, handling, and follow up. Non-emergency complaints may

be formally written to the organization, logged on the company's website, sent by mail on the company's Facebook page, made by phone or in person. Formal written communication can be sent or delivered to the local office in the various Family Islands (see Appendix 6) or to BPL's Headquarters at:

General Enquiries and Administration
Bahamas Power and Light Company Ltd.
Blue Hill and Tucker Roads
P.O. Box N-7509
Nassau, Bahamas

Consumers may contact BPL on the company's webpage at:
http://www.bahamaselectricity.com/contact/contact_form.cfm

or send mail on BPL's Facebook page at:
<https://www.facebook.com/mybec242/?fref=ts>

Consumers may also visit or call any of the Consumer Service Offices in the Family Islands, the BPL Main Office at Blue Hill and Tucker Roads at (242) 302-1000, or the Mall at Marathon Location at (242) 393-6052 in New Providence. Depending on the nature of the complaint, verbal or written follow up with the consumer takes place to advise them of the course of action undertaken by BPL or that needs to be carried out by the consumer.

Consumer Complaints – Billing

Any consumer with a concern regarding their monthly bill is encouraged to contact the Consumer Relations Section of BPL by phone or to lodge a complaint in person. Billing queries normally fall into one of several categories, namely, bill provision, high consumption or bill estimates and the initial step is to determine whether the issue is clerical or technical.

Clerical matters can typically be addressed in the office and may involve corrections to the consumer account setup or information. Technical matters are addressed initially through a special meter read (i.e. a technician will be dispatched to visit the site, confirm proper meter function, and record the present meter reading) followed by the appropriate corrective action. This may involve testing or changing the meter or reviewing the consumer's consumption pattern to determine whether the issue is due to a periodic shift in the consumer's usage. If it is determined that there is an actual error in the consumer's bill, the relevant correction is made and appropriate remedial action taken. The consumer is then advised of the findings.

Consumer Complaints – Power Quality and Service Interruption

A consumer's service can be affected in a number of different ways for several reasons. In every case, when there is something out of the ordinary, the consumer should call the Emergency Line for the island location where the problem is being experienced. It is important that these emergency lines be kept clear so that we can be notified of emergencies. Therefore, emergency lines should only be used for problems with the electricity supply and should not be used for billing complaints, disconnections due to nonpayment or for any other reason.

All BPL emergency lines are manned 24 hours a day. Interactive voice response (IVR) technology may also be used to enable operators to handle a large volume of calls. When IVR is used, consumers will be called

back in order to collect the information necessary to correct the problem, and teams will be dispatched as needed. Calls received by the IVR are instantly displayed on the operators' screens, allowing areas being affected by a problem to be identified quickly. The IVR system also creates a permanent record of the consumer call, including recorded messages.

Emergency Response Teams work 24 hours a day 7 days a week to respond to consumer trouble calls. Calls are normally dispatched in the order they are received and normally within 24 hours, unless there is a dangerous situation, such as a live electric line down, which warrants an immediate response.

Consumer Complaints – Damage of Electrical/Electronic Apparatus and Spoilage

Should a consumer experience problems with the service and damage occurs as a result, consumers may submit a damage claim to BPL. BPL will examine claims for damage to electric/electronic equipment and spoilage in the event of a negligent act by an authorized employee executing the installation or maintenance of any part of the network. In all instances, consumers should attempt the repair of the affected device from a licensed technician and should provide information from that technician, detailing the type and extent of damage and the cost to repair or replace the equipment (where applicable).

The Bahamas Power and Light Company will not honor claims for damages due to:

- Normal wear and tear failure of equipment on the transmission or distribution system;
- Third party damage or interference with the transmission or distribution system (including vandalism, accidents and/or sabotage);
- Weather related damages, including but not related to wind, storm and lightning related damages;
- Electrical faults on the consumer's premises beyond (or behind) the meter;
- Trees on consumers' properties which interfere with the power or service lines, including trees on neighboring properties;
- Voltage deviations due to transient faults; and
- Switching surges

BPL recommends that consumers insure electric and electronic equipment against damage.

Consumer Claims Process

Consumer Claims Forms may be collected from any of BPL's offices or from BPL's website. The completed claim form along with proof of purchase/value of the damaged item(s), technician's reports and estimates to repair or replace the damaged item(s) should be addressed to the Distribution Maintenance Department, located in BPL Administration Complex. Consumers are advised to keep copies of the documents submitted to BPL. Submissions must be made within 6 months of the damage incident date. The claim form should be completed in its entirety and all necessary supporting documentation provided in order to avoid delays in processing the claim.

Once the claim submission is complete, a site visit will be arranged during which technicians from BPL will:

- Confirm the integrity of the supply ;
- Examine the consumer's electrical installation up to the main switch only; and
- Examine the damaged item(s) and collect information/view spoiled items.

BPL will then respond to the consumer in writing, advising of its position in the matter.

Consumer Complaints – Tree Trimming

Consumers may report trees interfering with the overhead lines that are in road verges or public spaces to BPL at (242) 302-1470. It shall be the consumer's responsibility to keep trees and other similar growth on the consumer's property clear of overhead lines and service conductors. Where, in the determination of BPL, a consumer fails to adequately maintain the necessary clearances from overhead conductors, BPL shall have the right to enter upon the consumer's property to effect such clearance at the consumer's expense or to disconnect the service to the consumer, whichever action is warranted or expedient.

As it remains the responsibility of the consumer to keep trees clear from the overhead lines which may impact their services or the services of others, consumers should not plant trees that will grow to a height or width so as to impact electricity conductors. It is imperative that consumers not attempt to cut trees that are already impacting the power lines. The consumer may contact BPL to arrange for temporary disconnection of supply to allow for the safe clearing of offending trees, or may request that BPL perform the tree cutting services at a cost to the consumer. BPL consumers are advised that BPL is routinely engaged in scheduled Tree Trimming and Wayleave Management Operations that may impact the ability of BPL to respond to individual tree trimming requests.

Consumer Complaints - Street Lighting

BPL recognizes the importance of street lighting to the safety of the motoring public and the additional benefit that ambient lighting provides to crime deterrence. Consumers are reminded that security lighting for their properties remains their responsibility. BPL's Public and Street Lighting Section manages the timely restoration of extinguished streetlights through a maintenance program which includes nightly patrols and receiving and managing reports of outages. Reported outages are handled in the order that they are received unless the area in question is one that has already been identified for routine maintenance. Outages may be reported to BPL as above in writing, through the website on Facebook, or by phone at (242) 302-1593.

PART 6: CONSUMER DISPUTE RESOLUTION

Consumer disputes arise when an action or activity taken or carried out by BPL is unsatisfactory to the consumer or another third party. In some instances, depending on the cost and research time to resolve a dispute, and given its materiality or other implications, BPL will use its discretion in the resolution of the matter. If a consumer objects or disagrees with any decision or action performed by BPL, the consumer should put the matter in writing to the management team of BPL at the address below:

Dispute Notice
The Bahamas Power and Light Company Ltd.
Blue Hill and Tucker Roads
P.O. Box N-7509
Nassau, Bahamas

The complaint will then be directed to the appropriate member of the management team for review and the final position of BPL will be communicated within 15 working days of receipt of the written communication. The complaint letter should include:

CONSUMER PROTECTION PLAN
BAHAMAS POWER AND LIGHT COMPANY LTD.

- Consumer's name and Account Number
- Date of the occurrence/incident
- All appropriate documentation (previous letters to and from BPL, other information supporting the consumer's position or claim)
- Name of Representative or Department handling the matter to this point
- Summary of the issue/problem or claim

Should the parties be unable to amicably resolve the dispute, arbitration options or litigation initiated by legal counsel may be pursued by either party. The consumer may also make a complaint to URCA, by any of the following means:

By traditional mail:

Utilities Regulation and Competition Authority
P.O. Box N-4860
Nassau, Bahamas

By email:

consumer@urcabahamas.bs

By fax:

(242) 393-0153

Accelerated Dispute Resolution Related to Billing

BPL treats the resolution of all disputes as being equally important. Resolutions are sought in a timely manner irrespective of the individual issue's complexity, multi department involvement and dollar values. Consumer Complaints relative to Billing are given additional consideration and the Customer Relations Unit is tasked with reviewing/investigating all consumer complaints in a timely manner. In the event that the consumer is dissatisfied with the findings of the Customer Relations Unit, the consumer may raise the dispute directly with the office of the Vice President of Customer Services. This will ensure that Billing complaints receive immediate attention from the responsible senior executive. Internally, the decision of the Vice President of Customer Services is final. Following this review, if the consumer remains dissatisfied, the consumer may contact URCA for intervention.

PART 7: AMENDING CONSUMER PROTECTION STANDARDS

Procedure

BPL is constantly in pursuit of technological innovations that reduces inefficiencies and other operating costs and adds value to the consumer's experience. Whenever technological advancements impact both BPL and its consumer base, BPL may convene a consumer impact assessment study to determine the long term best economic and safety interest of both BPL and the consumer base at large. Once completed, the appropriate submissions and proposals will be made to URCA to be incorporated into the amendments relevant to the Consumer Protection Standards.

The above represents a draft of BPL's proposed consumer protection plan in advance of the commencement of discussions necessary to satisfy recent changes to the Electricity Act and the regularization of the electricity industry.

CONSUMER PROTECTION PLAN
BAHAMAS POWER AND LIGHT COMPANY LTD.

PART 8: STANDARDS OF SERVICE

SERVICE CATEGORY	TARGET
Service Activation (Removal of Disconnect Lock/Seal or Setting of Socket Meter in Energized Service Location following completion of application by the consumer)	Within 3 working days
Simple Service Connection (Final Connection to Existing Overhead Infrastructure within 60 feet/under 60 amps)	No charge for service connection Within 5 working days
Simple Service Connection (Final Connection to Existing Underground Infrastructure where service pillars or padmount transformers exist)	Customer Cost Estimate within 10 working days Connection within 21 working days following full payment
Complex Service Connection (Connections beyond 60 feet requiring service extensions)	Customer Cost Estimate within 21 working days following receipt of all required information needed for design Connection within 45 working days following full payment
Complex Service Connection (Connections requiring system reinforcements)	Customer Cost Estimate within 45 working days following receipt of all required information needed for design Connection dependent on works required to accommodate new loading.
Complex Service Connection – Developments, Subdivisions or projects requiring site visits	Customer Cost Estimate within 60 working days following receipt of all required information needed for design Connection dependent on works required to accommodate new loading.
Meter Reading (Frequency of Meter Reading)	100% of Residential Consumer Meters read every 3 months 100% of Commercial Consumer meters read every 2 months
Billing Period (Period between two meter readings whether actual or estimated)	95% of Consumers in the Billing Period shall be invoiced for no more than 33 days
Reconnection after disconnection for non-payment	Within 1 business day after required payment received by BPL
Wrongful Disconnection – Reconnection of a consumer account that was disconnected in error (i.e. customer not eligible for disconnection)	Reconnection within 4 working hours of notification by the consumer and verification by BPL. Compensation Offered - \$20.00 on application
Outage Notices	All Planned Outages announced via the local media 48 hours in advance of scheduled works

CONSUMER PROTECTION PLAN
BAHAMAS POWER AND LIGHT COMPANY LTD.

Trouble Call Dispatched to Emergency Crews	Within 24 hours of receipt of verified trouble call unless specific arrangements are made with the consumer to address otherwise.
Voltage Complaints – Resolution of High/Low Voltage complaint	Acknowledgement within 5 days Review within 15 Days Resolution within 60 Days
Billing Complaints	Acknowledgement within 5 days Response within 15 days to advise resolution or whether additional testing/investigation is required.
Fault Repair – On a single consumer service (after review by Emergency Services and call passed for further action)	Within 12 hours
Fault Repair System – Time to restore supply to multiple consumers affected by a Distribution System Fault	Within 24 hours
Response to Consumer Claims for Damage (Acknowledgement)	Acknowledgement returned to consumer on completed submission within 5 working days
Response to Consumer Claims for Damage (Resolution)	Review completed and initial response provided within 2 months of receipt of the completed consumer claim

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CONSUMER PROTECTION PLAN
BAHAMAS POWER AND LIGHT COMPANY LTD.

Index of Other Charges

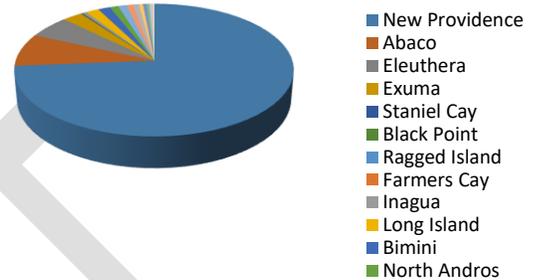
SERVICE	CHARGE OR FEE (B\$)
Replacement of Consumer Fuses	5.00
Special Meter Reads	5.00
Check Read	5.00
Temporary Disconnection of the Supply (at the consumer's request)	15.00
Follow Up Inspection of Installation Completed by Contractor after failing initial (free) site visit	25.00
Testing of Meter due to High/Low Consumption Complaint where no defect is found in the meter	0.00
Testing of Meter due to High/Low Consumption Complaint where the meter is deemed defective or the % error of the meter or metering installation exceeds 2.5%	25.00
Late Payment Fee	5.00
Disconnection Fee – Residential	10.00
Disconnection Fee – Commercial	15.00
Reconnection Fee	20.00
Returned Cheque Fee	15.00
Trimming of trees within a consumer's property which the consumer fails to keep clear of overhead lines or services.	\$75.00/hr. – With Consumer responsible for removal of debris \$115.00/hr. – With BPL responsible for removal of debris

APPENDIX 1

Consumer Summary by Island (As at 2016)

ISLAND	LOCAL OFFICE	# of Consumers
New Providence	YES	80,185
Abaco	YES	8,703
Eleuthera	YES	6,032
Exuma	YES	2,876
Staniel Cay	NO	173
Black Point	NO	120
Ragged Island	NO	48
Farmers Cay	NO	40
Inagua	YES	476
Long Island	YES	1,877
Bimini	YES	1,737
North Andros	YES	1,219
Cat Island	YES	1,219
Central Andros	YES	963
South Andros	YES	825
San Salvador	YES	583
Great Harbour Cay	YES	529
Mangrove Cay	YES	422
Acklins	NO	295
Crooked Island	NO	157
Mayaguana	NO	151
Rum Cay	NO	86
Long Cay	NO	11
TOTAL		108,727

**Bahamas Power and Light Company
Limited
Customers by Island**



Consumer Summary by Class (As at 2016)

CLASS	Number of Consumers
BEC Accounts	61
Residential	89,768
Small Commercial	14,931
Major Load	21
Large Commercial	691
Temporary Supply	2,969
Churches etc.	281
Street Lighting	5
Total: Consumers	108,727

APPENDIX 4

Landlord Authorization Form

DATE: _____

TO WHOM IT MAY CONCERN:

Re: Meter Number: _____
Street Name: _____
Apartment/House #: _____
Lights On: Yes _____ No _____

I write to inform you that Mr./Mrs./Ms./Miss _____
BPL Account No. _____ moved out of the above
premises on M/D/Y _____.

The new tenant, Mr./Mrs./Ms./Miss _____
BPL Account No. _____ moved in on
(M/D/Y) _____.

Should you require additional information, please do not hesitate to contact the
Landlord at telephone number _____, email
address _____.

Sincerely yours,

Landlord's Signature
(Print Clearly) Landlord's Name

Directions to Location: _____

New Tenants must bring in either a Passport, Driver's License or Voters Card, along with a National Insurance Card (NIC) and the Lease Agreement or 1st & last months' rent receipt for identification. For Non-Bahamians: All of the above, plus a valid Work Permit or Permanent Residency.

BPL will insert new account number and email to the landlord within five business days to evidence new account established and former tenant's account finalized.

Disclaimer – BPL shall not be held liable for any altered or falsified information included on this form.

APPENDIX 5

Tariff Schedule

[To be inserted]

Rates for the Usage of Electricity

Rates are filed with the Utilities Regulation and Competition Authority and are available on the BPL website or at any of our offices or Consumer Service Centers.

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APPENDIX 6

BPL Bill Pay Sites

ABACO

Marsh Harbour Main Office

Green Turtle Cay Office

Treasure Cay Office

Hope Town Office

Moores Island (No BEC Office - Local Police Office)

Sandy Point (No BEC Office - Administration Office)

Grand Cay (No BEC Office - Local Government Office)

Cooper's Town (No BEC Office - Local Government Office)

Guana Cay (No BEC Office - Local Government Office)

Man-O-War Cay (No BEC Office - Public Library)

Cherokee Sound (No BEC Office - Public Library)

Fox Town (No BEC Office - Local Post Office)

ACKLINS

No BEC Office

ANDROS (NORTH)

Nicholl's Town Main Office

ANDROS (SOUTH)

The Bluff Main Office

Little Harbour, Mangrove Cay May Office

ANDROS (CENTRAL)

Fresh Creek Local Office

BERRY ISLANDS

Bullocks Harbour Office

BIMINI

Alice Town Main Office

CAT ISLAND

The Cove Main Office

CROOKED ISLAND

Landrail Point Main Office

ELEUTHERA

Rock Sound Accounts Office

Harbour Island Accounts Office

Governor's Harbour Accounts Office

EXUMA

Exuma & Ragged Island Area Operation

Farmer's Cay (No BEC Office - Local Government Office)

Black Point (No BEC Office - Local Government Office)

Staniel Cay (No BEC Office - Local Government Office)

RAGGED ISLAND

Ragged Island (No BEC Office - Local Government Office)

INAGUA

Matthew Town Office

LONG ISLAND

Millers Long Island Main Office

MAYAGUANA

Betsy Bay, Pirates Wells, Abraham Bay (Local Government Office)

SAN SALVADOR

Cockburn Town Main Office

NEW PROVIDENCE

Blue Hill & Tucker Roads Main Office

BEC Main Post Office

BEC Mall at Marathon

Big Pond Complex

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