



THE BAHAMAS POWER AND LIGHT'S CONSUMER PROTECTION PLAN

Statement of Results and Final Decision

ES 06/2018

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Table of Contents

1	Introduction	1
2	Purpose of this Statement of Results and Final Decision	3
3	URCA’s Assessment of the CPP	4
4	Stakeholders’ Comments and URCA’s Response	11
5	URCA’s Final Decision	23
6	Next Step	27

Appendices

Appendix A	—Transcript of the Town Meeting at St. Joseph’s Parish Hall on 8 August 2017	28
Appendix B	—Transcript of the Town Meeting at Doris Johnson Senior High School on 15 August 2017	35
Appendix C	—Transcript of the Town Meeting at Patrick J Bethel High School, Marsh Harbour, on 27 September 2017	54
Appendix D	—Transcript of the Town Meeting at St James Community Center, Hope Town (Abaco) on 27 September 2017	58
Appendix E	—Transcript of the Town Meeting at St Martin’s Anglican Church, Sandy Point, on 28 September 2017	63
Appendix F	—Transcript of the Town Meeting at L.N. Coakley High School, on 23 October 2017	69
Appendix G	—Transcript of the Town Meeting in South Eleuthera on 1 November 2017	72
Appendix H	—Transcript of the Town Meeting at Rotary Club of Eleuthera, Cancer Society Building, on 2 November 2017	74
Appendix I	—Transcript of the Town Meeting at St John’s Anglican Church Parish Hall on 3 November 2017	81

Tables

Table 3.1:	URCA’s Assessment of the Revised CPP	7
Table 4.1:	URCA’s Response to Other Stakeholders’ Comments	12

1 Introduction

The Utilities Regulation and Competition Authority (“URCA”) issues this Statement of Results and Final Decision on The Bahamas Power and Light’s Consumer Protection Plan (the “CPP”). This Decision is based on URCA’s analysis of the CPP, in exercise of its power under section 40 of the Electricity Act, 2015 (“EA”), and follows URCA’s consultation process, commenced with the issuance by URCA of its “*Consultation Document on: The Bahamas Power and Light’s Consumer Protection Plan – ES 04/2017*” (“the Consultation Document”), issued by URCA in exercise of its powers under section 38(3)(c) of EA.

The Consultation Document was issued 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. URCA published the Consultation Document on 29 May 2017, and in the document URCA set out BPL’s initial proposal for a CPP, and URCA’s preliminary views on BPL’s submission. In the Consultation Document, URCA encouraged submissions and comments on the terms and conditions contained in the Consultation Document and also invited general submissions and comments. The closing date for the submission of responses was 31 August 2017. During the consultation process, URCA received comments from the general public during town meetings held in New Providence, Abaco and Eleuthera but no written comments were submitted. URCA thanks all of the participants for their valuable contributions.

URCA understands the importance of an open and transparent consultation process and is therefore satisfied that it has complied with its statutory duty under the EA by affording all persons having interest in the subject matter of the Consultation Document a reasonable opportunity to make submissions.

This Statement of Results and Final Decision now sets out URCA’s assessment of the CPP and URCA’s response to the comments received during the consultation process. It also presents the changes that BPL needs to make to the CPP for it to be approved by URCA.

The remainder of this document is set out as follows:

- Section 2: Purpose of this Statement of Results and Final Decision
- Section 3: URCA’s Assessment of the CPP
- Section 4: URCA’s Response to Stakeholder Comments on the CPP
- Section 5: URCA’s Final Decision
- Section 6 : Next Steps.

URCA has included the transcripts of the town meetings conducted by URCA as part of the consultation process, at which URCA received comments on the CPP, as appendices to this document as indicated below:

- Appendix A — Transcript of Town Meeting at St. Joseph’s Parish Hall on 8 August 2017

- Appendix B –Transcript of Town Meeting at Doris Johnson Senior High School on 15 August 2017
- Appendix D –Transcript of Town Meeting at Patrick J Bethel High School, Marsh Harbour, on 27 September 2017
- Appendix E –Transcript of Town Meeting at St James Community Center, Hope Town (Abaco) on 27 September 2017
- Appendix F —Transcript of Town Meeting at St Martin’s Anglican Church, Sandy Point, on 28 September 2017
- Appendix H —Transcript of Town Meeting at L.N. Coakley High School, on 23 October 2017
- Appendix J –Transcript of Town Meeting in South Eleuthera on 1 November 2017
- Appendix K –Transcript of Town Meeting at Rotary Club of Eleuthera, Cancer Society Building, on 2 November 2017
- Appendix L —Transcript of Town Meeting at St John’s Anglican Church Parish Hall on 3 November 2017

2 Purpose of this Statement of Results and Final Decision

The purpose of this Statement of Results and Final Decision is to:

1. Provide URCA's assessment of the CPP;
2. Summarise the written submissions received in response to the Consultation Document;
3. Provide URCA's analysis of and comments on the submissions received in response to the Consultation Document;
4. Determine if BPL CPP complies with the legal and regulatory requirements, or if changes need to be made to BPL's CPP for it to be compliant with the legal and regulatory requirements.

3 URCA's Assessment of the CPP

BPL submitted its initial version of the CPP to URCA on 5 May 2017, to comply with its obligations under the EA. In its initial review, URCA found that changes needed to be made for the CPP to comply with the legal and regulatory requirements, as well as best industry practices and asked BPL to revise and resubmit the CPP. BPL submitted the updated CPP on 17 January 2018, based on URCA's initial comments. URCA reviewed the updated CPP and found that most of URCA's requests and recommendations had been taken into consideration and incorporated into the document by BPL. However, URCA finds that not all URCA's initial requests were taken into consideration. In Table 3.1, URCA presents its analysis of the revised CPP. The table shows URCA's initial request to revise the CPP, URCA's assessment of the revisions made to the CPP, and URCA's comments regarding the changes that need to be made to the revised version of the CPP.

Table 3.1: URCA’s Assessment of the Revised CPP

URCA’s requested revisions	Revisions made to the CPP	URCA’s assessment
<p>The CPP did not mention specific standards or indicators used to measure service reliability. The measure and their targets should be included as an Overall Standard.</p>	<p>BPL did not include common reliability indicators as requested by URCA.</p>	<p>URCA requests BPL to include reliability indicators as Overall Standards. Some example of common reliability indicators used in the industry are:</p> <ul style="list-style-type: none"> ▪ System Average Interruption Duration Index (SAIDI). SAIDI measures the total duration of an interruption for the average customer given a defined time period. Typically, it is calculated on a monthly or yearly basis. ▪ The System Average Interruption Frequency Index (SAIFI), which measures the average number of times that a customer experiences an outage during the year. The Customer Average Interruption Duration Index (CAIDI), which measures how long it takes to restore the system once an outage occurs.
<p>Include the phone number for the Consumer Relations Section and Emergency Line for consumers to lodge their billing complaints and emergency requests</p>	<p>BPL included in the Consumer Complaints section (page 16) the emergency phone numbers available for different service territories</p>	<p>URCA finds that BPL complied with its request to include the phone numbers for consumer complaints and has no further requests.</p>

URCA's requested revisions	Revisions made to the CPP	URCA's assessment
<p>URCA found that the CPP included a section on resolving consumers that was not adequate because it did not provide a detailed process of how BPL would resolve consumer disputes. In addition, URCA found that some statements were confusing and made seem the process of resolving consumer dispute arbitrary. URCA requested BPL to provide a more detailed process to resolve consumer disputes.</p>	<p>BPL did not make changes to the section on consumer dispute resolution, in particular it did not provide a detailed process of how BPL would resolve consumer disputes.</p>	<p>URCA requests BPL to provide a more detailed process to resolve consumer disputes.</p>
<p>URCA found that the section on Accelerated Dispute Resolution Related to billing did not provide a timeframe in which BPL would address those issues. URCA requested that BPL include the timeframe for solving billing disputes.</p>	<p>BPL did not provide a timeframe in which BPL would address those issues.</p>	<p>URCA requests that BPL include the timeframe for the accelerated dispute resolution related to billing.</p>

URCA's requested revisions	Revisions made to the CPP	URCA's assessment
<p>URCA found that BPL's procedure to deal with other Vulnerable Consumers was vague and requested for this section to be more explicit about how it would deal with Vulnerable Consumers.</p>	<p>BPL modified the CPP's section on vulnerable consumers. It introduced a levelized billing option, a payment option where the consumer will be billed at a flat monthly fee equivalent to the average of the previous 11 months' electricity billing and the current month's billing for the service location.</p>	<p>URCA finds that for this type of arrangement to work, BPL should have complete and accurate information about the consumer's energy consumption, so as to not underestimate or overestimate the consumers consumption.</p> <p>URCA also finds that BPL's assessment to define other Vulnerable Consumers is vague and would benefit from rewording. In particular, URCA requests that BPL provide more clarity regarding the consumption level, the age of the applicant, and the annual household income at the residence.</p> <p>URCA considers that BPL should recognize vulnerable consumers from two perspectives;</p> <ul style="list-style-type: none"> ▪ Economically vulnerable ▪ Physically vulnerable <p>The criteria for determining Economically vulnerable customer for the Levelized Billing option should be the Annual Poverty Line index published in The Bahamas Household Expenditure Survey.</p> <p>A physically vulnerable person is an individual who is unable to take care of themselves by reason of age, illness, disability, or any other similar reason and may be harmed through the loss of electricity services to the building in which they are domiciled.</p>

URCA's requested revisions	Revisions made to the CPP	URCA's assessment
		<p>The CPP outlines that BPL requires a letter from a customer issued by a [licensed] medical doctor indicating that a [vulnerable person] is domiciled in the customer's building. In such cases and upon verification BPL will then identify the account as a Vulnerable Customer Account to be recertified annually. URCA believes that BPL shall make contact with such vulnerable customers before disconnection is affected.</p>
<p>URCA found that BPL's CPP did not include Overall Standards. Overall Standards are standards that the utility aims to meet on average across quality and service, but do not apply to individual consumers. URCA requested that BPL include Overall Standards in the CPP. URCA had advised to include Overall Standards in a table identifying the type of service, and the minimum performance of that service.</p>	<p>BPL has included a section on Overall Standards as requested by URCA. The standards and its target are presented in a table in Part 9.</p>	<p>URCA finds that BPL complied with its request to include Overall Standards in the CPP. The Overall Standards table details the standard and the target.</p> <p>URCA finds the targets set for the standard are acceptable for the moment. However, URCA considers that BPL needs to work on improving the proposed target for responding to emergencies (24 hours) and for responding to voltage complaints (visit within 2 days). URCA finds these targets compare poorly with other Caribbean utilities response times. For example, in Jamaica the target for responding to emergencies is 12 hours, while visit to household with voltage complaints are carried out within 24 hours after the complaint is lodged.</p>
<p>URCA found that BPL's proposal to reconnect within 4 hours of notification and compensate the consumer from wrongful</p>	<p>BPL has defined "reconnection after wrongful" disconnection as a standard which is targeted</p>	<p>URCA finds that BPL complied with its request to set a timeframe for the reconnection after wrongful disconnection (1 working day) after a customer application is made. URCA also finds that BPL</p>

URCA's requested revisions	Revisions made to the CPP	URCA's assessment
<p>disconnection was inadequate because it did not specify how the consumers would be compensated and did not specify the time frame</p>	<p>at 8 hours. BPL has proposed a compensation fee of \$20.00</p>	<p>specified the B\$20.00 compensation will be credited to the customer's account and not be paid in cash.</p> <p>URCA notes that in the revised CPP, BPL extended the timeframe to compensate consumers from 4 hours to 8 hours. This standard compares poorly to other Caribbean countries; for example, in Jamaica the reconnection after wrongful disconnection is carried out within 5 hours of notification by the consumer.</p> <p>URCA considers that BPL should shorten the timeframe to reconnect after wrongful disconnection, to no more than 6 hours.</p>
<p>URCA found that BPL's proposal to handle trouble call to dispatched emergency crews was not adequate because it was vague. URCA requested BPL to adopt a clearer response procedure.</p>	<p>BPL did not improve its process to handle trouble call to dispatch emergency crews.</p>	<p>URCA requests BPL to adopt a clearer response procedure.</p>
<p>URCA found that BPL's proposal to deal with voltage complaints was inadequate because the response times were too long to address voltage irregularities, especially high voltage issues. In addition, BPL's procedure to deal with high-voltages was vague.</p>	<p>BPL modified the timeframes to respond to voltage complaints to:</p> <ul style="list-style-type: none"> ▪ Visit within 2 working day (from 5 days) ▪ Assessment within 5 working days (from 15 days) 	<p>URCA is satisfied with BPL's proposed timeframe for responding to voltage complaints.</p>

URCA's requested revisions	Revisions made to the CPP	URCA's assessment
<p>URCA had requested BPL to improve its procedures and timeframe to respond to voltage complaints.</p>	<ul style="list-style-type: none"> ▪ Resolution within 45 days (from 60 days) 	
<p>URCA suggested to implement an automatic compensation system instead of a claim-based system.</p>	<p>BPL's CPP states compensation payments will be made after a customer application, following a claim-based system. The amounts are to be credited to a consumer's account.</p>	<p>URCA notes BPL wants to continue with a claim-based compensation payment and is prepared to approve this decision for the moment. However, BPL should work to implement an automatic compensation system, which is less onerous on the consumer. URCA will seek to address this issue in future regulatory engagement with BPL.</p>

4 Stakeholders' Comments and URCA's Response

URCA initiated the consultation process with the publication of the "Consultation Document on: The Bahamas Power and Light's Consumer Protection Plan – ES 04/2017" (Consultation Document), which provided members of the public and interested parties the formal means to make written submissions on the subject matter of the Consultation Document. URCA is now pleased to publish a summary of such responses to the Consultation Document, its analysis of and comments on the responses, and its Statement of Results and Final Decision.

As part of the consultation process, URCA organized town meetings to hear and receive comments and submission from stakeholders regarding BPL's CPP. The comments URCA received from stakeholders during town meetings were generally constructive, insightful, and useful. In Table 4.1, URCA summarizes the stakeholders' comments and provides URCA's response to those comments.

The public should note that URCA has only included in Table 4.1 comments related to the BPL's CPP. To determine if a comment was related to the BPL's Consumer Protection Plan, URCA analysed if the comment:

- Is directly related to BPL's consumer protection obligations under the Electricity Act. More specifically, the stakeholder comment is related to the requirements of the CPP under the Act, such as the standards of service, procedure for receiving and responding to consumer complaints, procedure for resolving disputes with consumer, and other requirements in section 40 of the Electricity Act;
- Is directly related to specific sections or information provided in BPL's CPP; or
- Is the stakeholder's direct response that he clearly agrees or disagrees with a specific section of the CPP, or is responding to the questions posed in the Consultation Document.

Table 4.1: URCA’s Response to Other Stakeholders’ Comments

Stakeholder Comment	Town Meeting	Section of the CPP comment is referring to	URCA’s Response
<p>Pericles Maillis “This document needs to compel BPL to maximize its security, and look for ways and means to transport fuel without these events happening” (in relation fuel spills, wastage and fuel theft)</p> <p>“What I want to ask, they say that they are at 2%. I am not sure I understand it, but what I need URCA to help the public find is independent technology inside our house, free of BEC that can monitor these variations in surging and pulsing. It is happening all over New Providence. Our people’s computer destroyed, freezer burned out, all sort of things are happening that is what the public sees and experiences. You might sometimes give them compensation and so forth, but the other thing that the public does not understand is that meter is jumping forward and jumping forward, and we have to pay more than we are really using. And we need independent technology that we could put in at our cost, if</p>	<p>Town Meeting at St. Joseph’s Parish Hall on 8 August 2017</p>	<p>Consumer Complaints- Power Quality and Service Interruption</p>	<p>URCA is sympathetic to Mr. Maillis’ comment regarding fuel spill, wastage, and fuel theft, and agrees that BPL should work towards maximizing the security and safety of its consumers. However, the focus of this document are the standards of service, quality and safety of the <u>electricity service</u> provided directly to the consumer, such as how the company deals with voltage deviations and disputes with consumers. URCA will take into consideration Mr. Maillis’ comments in the exercise of its functions as the regulator of the electricity sector.</p> <p>URCA is sympathetic to Mr. Maillis’ comment regarding metering and voltage deviations. URCA finds that BPL should specify in the CPP what equipment and devices the public can use to check their consumption as to ensure the service the tariffs they are paying for is commensurate with their consumption. The cost of the equipment and devices used are to be borne by the consumer, and the installation should be</p>

Stakeholder Comment	Town Meeting	Section of the CPP comment is referring to	URCA's Response
<p>necessary, so that we can know that we are really being charged truthfully." (in relation to metering)</p>			<p>done by certified electricians to ensure the safety of the system.</p>
<p>Wilfred Smith: "I would like to, because number one on page 26 your tariff schedule is missing, because I would have loved to comment on that"</p> <p>"I did not see that benefits BPL, the consumers and the country, is some type of incentive programs when persons take the initiative. I think one of your mandate number one is to educate about conservation and efficiency"</p> <p>"On page 22, you have Appendix 1 Consumer Summary by Class, and you have Street Lighting 5. Could you indicate to me what that means?"</p>	<p>Town Meeting at St. Joseph's Parish Hall on 8 August 2017</p>	<p>Tariff Schedule (appendix 5)</p>	<p>URCA is sympathetic to Mr. Smith's comment. URCA finds that consumers are entitled to have complete and transparent information about the cost of the service. In Appendix 5, the revised CPP states the tariff schedule is available on the BPL website or at any Consumer Service Center.</p> <p>URCA is sympathetic to Mr. Smith's comment regarding the importance of educating consumers on conservation and efficiency. URCA welcomes any initiative BPL presents regarding conservation and efficiency. However, URCA notes that the CPP is not legally required to include a section on conservation and efficiency per Section 40 of the Electricity Act. Therefore, the inclusion of information regarding these topics in the CPP is not required. BPL and the public should also note that per Section 39 of the Electricity Act, Public Electricity Suppliers can develop energy efficiency programs that can be</p>

Stakeholder Comment	Town Meeting	Section of the CPP comment is referring to	URCA's Response
			<p>approved by URCA after[issuing] the program for public consultation.</p> <p>Regarding the consumer class "Street Lighting" listed on page 22, the descriptive table shows there are 5 accounts that are attributed to Street Lighting as a customer category.</p>
<p>Delancy: "I have a complaint in with them with regards to my meter reading for the past two months, meter reading as it relates to the accuracy. (...) They've changed my meter recently, but I've seen here under meter accuracy and another section where they issue a certificate of protesting of the meter. They changed my meter without any notification. They just came in. I watched them on my CCT camera. They came in changed the meter. I did not get a report to say what they are testing, what the result were. If stuff like that could be brought to light that would be good".</p>	<p>Town Meeting at St. Joseph's Parish Hall on 8 August 2017</p>	<p>Meter Accuracy</p>	<p>URCA is sympathetic to Mr. Delancy's comment and understands the importance of clear communication between BPL and its consumers. URCA notes that the CPP states that meters may be tested in the field by BPL for verification or upon request, and that adjustments can be made to the customer account if necessary if failures are detecting in the metering system. However, the CPP does not describe the process to inform consumer about testing and the results of the verification. URCA requests that BPL detail the process for contacting consumers to notify their meters will be tested and to disclose the results of the test at the consumers' request.</p>

Stakeholder Comment	Town Meeting	Section of the CPP comment is referring to	URCA's Response
<p>Audience member: "I am looking on page 19, where they say the standard of services. The first time I heard about this outage notice, I was shocked, because I am thinking BPL, BEC has never said that we are going to cut off the power for a certain time. I've never remembered hearing about some announcement towards it"</p>	<p>Town Meeting at St. Joseph's Parish Hall on 8 August 2017</p>	<p>Standards of Service</p>	<p>URCA's role is to ensure BPL complies with the standards of service listed in the CPP. A customer can lodge a complaint against BPL for failing to comply with the standards listed in the CPP.</p>
<p>Smith: "And so what I would like to suggest is that it be made mandatory that when the utility company is going to change persons' meters to let the client know"</p>	<p>Town Meeting at St. Joseph's Parish Hall on 8 August 2017</p>	<p>Meter accuracy</p>	<p>URCA is sympathetic to Mr. Smith's comment and understands the importance of having clear communication between BPL and its consumers. URCA requests that BPL detail the process for contacting consumers to notify their meters will be tested and/or changed.</p>
<p>Winton Meadows Resident: "Tree trimming, if you have a tree in your own yard you are responsible for it. If it is on the government's side, it is coming now to the hurricane season, BEC has to cut them."</p>	<p>Town Meeting at Doris Johnson Senior High School on 15 August 2017</p>	<p>Tree trimming</p>	<p>URCA finds that the CPP is clear about whose responsibility it is to trim trees and believes no further changes are needed to the CPP in that matter. According to the CPP, BPL is responsible for trimming trees interfering with the overhead lines that are in road verges or public spaces. The consumers are responsible for trimming trees in their properties.</p>

Stakeholder Comment	Town Meeting	Section of the CPP comment is referring to	URCA's Response
<p>Martinborough</p> <p>“I see your consumer complaints about damage to electrical appliance and spoilage. The next point there is normal wear and tear -- the power company will not honour claims due to normal wear and tear or failure of equipment of the transmission and distribution system. So whose responsibility is it to maintain equipment”</p> <p>“Third party damage or interference to the distribution system, including acts of violence, arson or sabotage. Why do I have to pay for that?”</p>	<p>Town Meeting at Doris Johnson Senior High School on 15 August 2017</p>	<p>Consumer complaints</p>	<p>URCA is sympathetic to Mr. Smith's comment and understands the importance of having clear understanding of what are URCA's responsibilities regarding consumer complaints. In the consumer complaints section of the CPP, BPL states that it will not honor claims made by consumers on damages on the transmission or distribution system.</p>
<p>Hepburn:</p> <p>“How do we know when we are being charged for the fuel being produced within that period rather than previous periods? The second thing even when you get bills, for example, even after hurricane Matthew, they pulled that thing where they said that we are going to bill ahead of time, because the billing system could not handle it. Even though their own centers did not know what they were talking about, because they were</p>	<p>Town Meeting at Doris Johnson Senior High School on 15 August 2017</p>	<p>Billing</p>	<p>URCA is sympathetic to Mr. Hepburn's comment and understands the importance of having a transparent billing process and system to ensure the consumers are paying for their consumption.</p>

Stakeholder Comment	Town Meeting	Section of the CPP comment is referring to	URCA's Response
<p>telling you different stories. So how can they ask for money ahead of time, especially after a hurricane Matthew disaster it does not make any sense at all and you almost had people have a heart attack because of the high bill. I remember that in either 2012 or 2013 I had a bill for \$1,500 and we don't run A C like that. So how can you have a bill for \$1,500 for a small home that does not run as much. And when they bill, they always bill for 28 days, but sometimes you have to wonder, if it is for 21 days</p>			
<p>Audience member "The problem is that BPL has a policy that I can't see the meter. That's their meter. The point that I am making is that, if there is an adjustment or changing of a meter the customer should have the right to inspect that meter because in your billing you said the meter is field tested. In your document here I just quickly read it. I don't have a copy, so I can't see that. So, a customer should have the ability to review their billing."</p>	<p>Town Meeting at Doris Johnson Senior High School on 15 August 2017</p>	<p>Billing</p>	<p>See the response to Mr. Delancy's comment (Town Meeting at St. Joseph's Parish Hall on 8 August 2017)</p>
<p>William Carroll</p>	<p>Town Meeting at Doris Johnson Senior</p>	<p>Billing and Estimated Billing</p>	<p>URCA finds that the CPP clearly states the actual meter reading takes precedence over any other</p>

Stakeholder Comment	Town Meeting	Section of the CPP comment is referring to	URCA's Response
<p>"I want to put in that document that if they cannot read your meter, they cannot send a bill until the meter is read. Or the alternative is if they estimate the bill, the bill should be the minimum of the last bill of the previous year. So, at least they will be getting some money, but they will to be over charging the customer. Right now, what they are doing is double and triple over-charging the customer."</p>	<p>High School on 15 August 2017</p>		<p>billing data and that the bills are calculated at the approved rates using the meter readings. Where meter reading is not viable, consumption and billing will be estimate using the methods outlined in the "Estimate Readings" section of the CPP.</p>
<p>William Carroll "The other one that I saw on the document is that if you request a meter test, and they say that they find it faulty you can be charged \$25, and if they find it working you will not be charged. I don't understand it in the document."</p>	<p>Town Meeting at Doris Johnson Senior High School on 15 August 2017</p>	<p>Index of other charges</p>	<p>URCA finds that charging the consumer more for testing a meter that results to be defective than for testing a meter that results accurate is not adequate and does not follow industry standards. The industry standard is that in cases where the meter is found to be accurate, the utility charges the customer for the costs it has incurred in visiting the premises, whereas in cases where the meter is inaccurate or defective, the utility charges a smaller amount, or no charge at all, to the consumer. For example, in Jamaica, the customer must pay the cost of a meter accuracy verification check if the meter is found to be working within the prescribed tolerance. If the meter accuracy verification</p>

Stakeholder Comment	Town Meeting	Section of the CPP comment is referring to	URCA's Response
			<p>check shows that the meter is operating outside the required tolerance, the customer shall not pay the cost of testing¹.</p> <p>URCA requests BPL to modify the charges for meter testing to follow industry standards.</p>
<p>Silbert Mills: “Can they set out guidelines for the circumstances for you to be able to claim for? If there are no guidelines. Sometimes you are wasting your time going to claim for when you lose appliances. So, we need to know whether we are wasting time.”</p>	<p>Patrick J Bethel High School, Marsh Harbour, on 27 September 2017</p>	<p>Consumer complaints</p>	<p>URCA finds that BPL, in the revised CPP (Part 5), listed a number of specific cases for which the consumer can file claims. URCA is satisfied with the cases listed and does not have further request.</p>
<p>Audience member “The one thing is, I have had a lot of damaged equipment. I have been to BPL straight up to the CEO Level and now she is gone so I have to start all over again. But the thing is, here is what we find, here is that sometimes BPL in Nassau does not know what is going on with BPL here in Abaco. There are times when because of my meeting with executives in Nassau I will be telling</p>	<p>St James Community Center, Hope Town (Abaco) on 27 September 2017</p>	<p>Consumer complaints</p>	<p>URCA is sympathetic to Mr. Smith's comment and understands the importance of clear communication between BPL and its consumers. In the CPP, BPL states that consumer complaints will be logged, handled and followed up. BPL should specify in the CPP how the case will be logged to ensure the consumer can follow up on the status of the complaint. For example, BPL should specify if the complaint will be logged</p>

¹ OUR, “Meter testing administrative and operational protocol for the electricity and water sectors in Jamaica”, October 2017, http://www.our.org.jm/ourweb/sites/default/files/documents/sector_documents/mtaop_for_the_electricity_and_water_sectors_in_jamaica_0.pdf

Stakeholder Comment	Town Meeting	Section of the CPP comment is referring to	URCA's Response
<p>them things and they don't know what-- that it is happening here in Abaco at the plant. So, what are you all going to put in this document to say that there is correspondence within the organization. Not only that I have telephone numbers for persons who are in management at BPL in Abaco and sometimes they do not know what is going on. And I am glad I have their cell phones because I could say that we just got hit real hard, we've been out for half an hour and they will say that I don't even know that. And they then get to the plant people and they can say that we are down for this. We don't know if what they are telling us is the truth. Sometimes they say that a lamp pole is down in Abaco and we don't even know if that is the truth. There are a lot of things going on internally and BPL is not speaking to their management and then passing it on to Nassau with the truth"</p>			<p>with a complaint number or any other tracking mechanism.</p>
<p>I noticed in your draft there that are required to supply a minimum of 13 and a maximum of 20 volts. I monitor voltage on my house on a regular basis and I regularly see that the voltage is on the outside of that window. So, what in this draft is</p>	<p>St James Community Center, Hope Town (Abaco) on 27 September 2017</p>	<p>Power quality</p>	<p>URCA finds that the CPP is clear on the actions and processes the consumer should follow when experiencing service voltage deviations. According to the CPP, "the voltage under normal system operation will be allowed to deviate by a</p>

Stakeholder Comment	Town Meeting	Section of the CPP comment is referring to	URCA's Response
there to protect me as a consumer from lower or higher voltages? I am monitoring and I am monitoring 107 for a week. How am I protected?"			value not to exceed +/-6% of normal. BPL will take corrective action to return the voltage within the allowed range" (Part 4 of the revised CPP). The consumer should notify BPL if he/she is experiencing service problems so that BPL can take corrective measures.
Audience member "BEC, how come they don't pay consumers interest on their security deposit?"	Town Meeting at St Martin's Anglican Church, Sandy Point, on 28 September 2017	Security Deposits	URCA believes that interest on consumer deposits is a reasonable proposition and will be considered in any regulatory measures undertaken by URCA relating to the protection of consumers
Audience member "I think as senior citizens we should be given a discount on our light bill. I think you all should look into it. We paying rent. Water & Sewerage gives senior citizens a discount."	Town Meeting at St Martin's Anglican Church, Sandy Point, on 28 September 2017	Vulnerable consumers	URCA is sympathetic to the audience member's comment of having clear rates and scales of charges for electricity. However, the focus of this document are the standards of service, quality and safety of the <u>electricity service</u> provided directly to the consumer. URCA will take into consideration the audience member's comments in the exercise of its functions as the regulator of the electricity sector.

URCA recognizes the valuable contributions made by other stakeholders during this consultation process and has provided the transcripts of those contributions as appendices to this document. URCA notes that some comments received were not related to the CPP, such as enquiries about renewable energy programs and complaints regarding the tariffs. URCA sympathizes with consumers and their complaints, however these are not taken into consideration in this document as they do not relate to the CPP.

For the ease of reference, URCA has included the transcripts of the town meetings as appendices to this document.

5 URCA's Final Decision

The Utilities Regulation and Competition Authority ("URCA") issues this Final Decision pursuant to section 38(3)(c) of the Electricity Act, 2015 ("the EA"). This Decision requires the Bahamas Power and Light Company Limited ("BPL") to amend its Consumer Protection Plan ("CPP"), as set out below.

"WHEREAS:

- I. Section 22 of the EA designates URCA as the independent regulator of the electricity sector for The Bahamas and empowers it to exercise and perform its functions and powers in accordance with the provisions of the EA and the Utilities Regulation and Competition Authority Act ("URCA Act");
- II. 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"*;
- III. Section 37(2)(k) of the EA provides that URCA, in the regulation of the sector shall *"ensure consumer protection and support appropriate billing, credit and collection practices"*;
- IV. Section 40(1) of the EA imposes an obligation on BPL to submit to the URCA for approval a plan proposing standards for the protection of its electricity consumers;
- V. Section 40(2) of the EA establishes those matters that must be included in the consumer protection plan;
- VI. Section 40(3) of the EA requires URCA to, before granting its approval, publish the proposed consumer protection plan for public consultation;
- VII. Section 40(4) of the EA provides that URCA may, on completion of the public consultation, require a public electricity supplier to revise the proposed protection plan";
- VIII. Section 41(2) of the EA requires URCA to allow persons with sufficient interest a reasonable opportunity to comment on proposed regulatory and other measures which, in the opinion of URCA, are of public significance and give due consideration to the comments received prior to introducing the regulatory measures and other measures;
- IX. 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;
and*
- c) a significant impact on the general public in The Bahamas;*

- X. On 5 May 2017 BPL submitted its Consumer Protection Plan (CPP) to URCA proposing standards for the protection of its electricity consumers;
- XI. URCA conducted a review of the CPP and considered that the CPP plan was not in full compliance with the statutory requirements under section 40(2) of the EA and not in line with best industry practices;
- XII. On 29 May 2017 URCA advised BPL that changes were required to the CPP, taking into account URCA's concerns and recommendations;
- XIII. On 17 January 2018, BPL resubmitted its revised CPP to URCA. Consequential to URCA's review of the revised CPP, URCA considers that there are key concerns and recommendations made by URCA essential to the protection of its electricity consumers that have not been incorporated in the revised CPP;
- XIV. In discharge of its statutory duty under section 40(3) of the EA to publish the proposed CPP for public consultation, on 29 May 2017 URCA published the BPL CPP -ES 04/2017 and invited interested parties with sufficient interest in the matters set out in the Consultation Document to submit written comments to URCA by 31 August 2017; and
- XV. Between August and November 2017 URCA held town meetings with residents on the Family Islands of Abaco, Eleuthera, Long Island and New Providence as part of its consultation process in relation to the CPP.

HAVING REGARD TO THE EA AND HAVING CONSIDERED all comments and submissions made by respondents to the public consultation document and the residents on the said Family Islands, **URCA HEREBY DECIDES** as follows that:

The proposed Consumer Protection Plan submitted by the Bahamas Power and Light to URCA for consideration fails to:

- i. include reliability indicators as overall standards in accordance with industry best standards;
- ii. provide a detailed process to resolve consumer disputes;
- iii. include timeframes for accelerated dispute resolution related to billing;

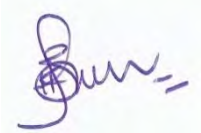
- iv. provide for the two types of vulnerable customers (i.e., economic and physical);
- v. establish adequate timeframes to reconnect electricity service after wrongful disconnection in accordance with industry best standards;
- vi. specify the equipment and devices the public can use to verify their electricity consumption;
- vii. describe the process for contacting consumers to notify that their meters will be tested by BPL and to disclose the results of the test at the consumers' request;
- viii. provide for the revision of charges for meter testing in accordance with industry best standards; and
- ix. specify the manner in which customer complaints will be logged with BPL to ensure that the customer will be able to follow-up on the status of a complaint made by such customer.

HAVING MADE ITS DECISION ABOVE, in exercise of its powers under section 40(4) of the EA, URCA hereby **REQUIRES** the Bahamas Power and Light Company to:

- A. Revise and amend its proposed Consumer Protection Plan to the extent that it shall:
 - i. include reliability indicators as overall standards in accordance with industry best standards;
 - ii. provide a detailed process to resolve consumer disputes;
 - iii. include timeframes for accelerated dispute resolution related to billing;
 - iv. provide for the two types of vulnerable customers (i.e., economic and physical);
 - v. establish adequate timeframes to reconnect electricity service after wrongful disconnection in accordance with industry best standards;
 - vi. specify the equipment and devices the public can use to verify their electricity consumption;
 - vii. describe the process for contacting consumers to notify that their meters will be tested by BPL and to disclose the results of the test at the consumers' request;
 - viii. provide for the revision of charges for meter testing in accordance with industry best standards; and
 - ix. specify the manner in which customer complaints will be logged with BPL to ensure that the customer will be able to follow-up on the status of a complaint made by such customer.

AND

- B. Submit to URCA its revised and amended proposed Consumer Protection Plan in accordance with the items set out in section (A) above no later than thirty (30) calendar days after the publication of this Statement of Results and Final Decision.



Stephen Bereaux
Chief Executive Officer
Utilities Regulation and Competition Authority

6 Next Step

In accordance with section 40 (4) of the EA, URCA now requires BPL to revise and amend its proposed Consumer Protection Plan (CPP) consistent with the Decision herein.

BPL shall comply with this Decision and in doing so it shall take into account URCA's analysis of the responses received to the consultation document ES 04/2017 as set out in Sections 3 and 4 of this Statement of Results and Final Decision document. BPL shall submit the final revised version of the CPP to URCA within thirty (30) calendar days from the publication of this Statement of Results and Final Decision.

Failure by BPL to comply with this Decision or any part thereof may result in a breach of section 40(2)(4) of the EA, inter alia. Additionally, section 63 of the EA provides for URCA enforcement orders which could result in a fine not exceeding ten percent of the Licensee's relevant turnover and/or other remedies determined by URCA in accordance with section 72 of the EA.

Upon final review and approval of the plan, URCA proposes to publish same on its website within thirty (30) calendar days of its decision. Also, to ensure easy access by customers URCA reserves the right to publish BPL's guaranteed and overall service standards in a separate document.

Appendix A—Transcript of the Town Meeting at St. Joseph’s Parish Hall on 8 August 2017

Pericles Maillis:

I am a lawyer, fisherman, conservationist, environmentalist. I don’t mind being called tonight; I have several questions. The public, my whole family, myself personally are in a state of terror because of the rising cost of electricity, and I don’t believe that our prosperity is going to be sustainable. Electricity cost has wrecked the hotel, the chicken farm. I’ve watched it ruin small restaurants. As a lawyer hear and see it all, including very close to me. I would hope that, at the end of the day, the main focus of BPL and URCA and government would be to work, strive to get the cost of electricity and these prices down. The real terror is the fuel surcharge.

FUEL SPILLS AND WASTAGE

What is particularly touchy, and, if I run out of time, I have photographs for the press or anyone who wants to see them. While you have been putting up the fuel surcharge, there has been tremendous wastage and stealing of BEC fuel. There is a pipe that runs from Clifton Pier to Blue Hills and, for years and years, there has been huge oil spills at Blue Hills Power Plant contaminating parts of that water field. There has been instances where BEC has had leaks in that power line. They actually pump the diesel, I don’t know if the public knows this. They pump the diesel under the main highway where it deviates and turns up in Blue Hill Road, where I live in Adelaide, where BEC has had to buy someone’s property, because there was so much oil under it.

How I know, and why I am carrying pictures, because on the 29th of November I went to walk my eastern boundary, but to do that I had to use New Providence Development Road. It separates us from part of their water field and I came across a bulldozed road leading into my land. I never go there, but I was looking for stakes for a surveyor who was coming. I could smell diesel, tremendous powerful diesel. I have the pictures, the whole area where this bulldozed clearing was stink of fuel oil. I went to Environmental Health, and I brought their inspector Mr Riley, and we thought, and they thought that somebody was illegally dumping fuel into the pineyard. That is November 29th. Environmental Health did not want us to go to the police; they wanted to catch them themselves, and solve it. Nobody went to Albany. They have pictures of the trucks that were there when this event happened. That is November 29th, and I am sorry that it is taking so much time, but the public needs to know this. URCA needs to know this. This document needs to compel BPL to maximize its security, and look for ways and means to transport fuel without these events happening.

FUEL THEFT

The first of March, we got all of December, all of January, all of February--the first of March we start to smell tremendous smell of diesel, as we were passing and, eventually, it was found out that diesel oil from BEC pipeline was pouring into the corner of my property, my father and my property. It filled up a swamp that was there, poured over the road, and was filling up the trenches of the New Providence Development water field. It was like an oil field, literally. Nobody knows

how much was done. This time I went to BEC Security and New Providence Development. And BEC Security said, "Oh, no no, that is dumping, that is stealing." They found it, and I have the pictures. The people had actually dug under the road, put a valve, run a pipe out to the edge of the bush, then run another pipe out to the back. The truck would go out to the back (and) fill up when it wanted. According to the New Providence Development Security Guard, it only came to light by accident, because the same thief who was stealing the diesel was having sex with a girl in the truck, while the truck was being loaded, and it started pouring all over the ground, and that is how it came to light. That is diesel going and going all that time, and we don't know how long it was going, and we the public are paying for the fuel surcharge. So that one got sealed off with concrete.

A few months later, another stealing was found up near the Albany, Adelaide junction. I gather there were arrests made. I won't say anything more. I have not heard anymore of the fate of that case. Then, within a short time, a car ran off the road, hit one of the BEC power lines. Then the angle bent the pole over in towards the swamp in the Adelaide Corry Sound, and the bottom of the pipe broke BEC's diesel line, and there is another flood, and diesel is pouring into the marshes toward Corry Sound. There was remediation. BEC moved to clean up as much as it can, but if you drive down those places you can still smell diesel, and that is just three within one mile. So that line is not secure, sir, and nobody know just how many more taps there are on to it. There are stories about, and this is just pure hearsay--BEC's engineers saying that they have never been able to get it right, as to where the start and how much goes, and that's how come it flows over to the other end. But somewhere, for a very long time the public has been paying fuel surcharge, and the fuel is being stolen or wasted. Where it is wasted into the ground, it brings us cancer, pollution and contamination. So when you finish the drafting of this, please mandate BPL they have got to get these kinds of things under control, and they have to maximize security, because we should not have to be paying for stolen or wasted fuel.

METER IRREGULARITIES

Secondly, I used to be on the Board of Gladstone Farms. It was not only electricity cost but bird poultry disease. But Mr. Nutt, God rest his soul, showed us one day that the meter was pulsing every so often, and every time it pulsed, it jumped forward. And, because of the way the electricity was pulsing and surging, the meter was accelerating.

What I want to ask, they say that they are at 2%. I am not sure I understand it, but what I need URCA to help the public find is independent technology inside our house, free of BEC that can monitor these variations in surging and pulsing. It is happening all over New Providence. Our people's computer destroyed, freezer burned out, all sort of things are happening that is what the public sees and experiences. You might sometimes give them compensation and so forth, but the other thing that the public does not understand is that meter is jumping forward and jumping forward, and we have to pay more than we are really using. And we need independent technology that we could put in at our cost, if necessary, so that we can know that we are really being charged truthfully. Other than that a general exhortation, your mandate is not just to keep things smooth and so forth. Your greatest mandate needs to be to help us get the cost of electricity down,

because if we don't, we are not going to make it. I been a lawyer 44 years, my National Insurance doesn't even cover my light bill -- it is like a second mortgage payment on most of the public. You build your house, you pay your mortgage, but your light bill is as big as your mortgage. And people face poverty in their old age people with fixed incomes, so that is much more serious. And we demand and need a more higher seriousness about reducing costs and reducing your general operating cost, so that you don't charge it all to us--which the law allows you to do--and help us.

Thank you very much.

Wilfred Smith:

Good evening everybody. My name is Wilfred Smith. I am part of the Chamber of Commerce Energy Committee; I am also part of Civil Society's Energy Chairperson. There are several questions and answers I am hoping to get this evening. I can't offer the amount of consultation and information I would like to, because number one on page 26 your tariff schedule is missing, because I would have loved to comment on that. Any idea when that would be available?

Cambridge:

The tariff schedule is currently available on BPL's website but we could have the document amended to insert that.

Smith:

What I would like to suggest--particularly since you are benchmarking against best practices of utility companies around the world--one of the things that I did not see that benefits BPL, the consumers and the country, is some type of incentive programs when persons take the initiative. I think one of your mandate number one is to educate about conservation and efficiency.

Cambridge (URCA):

Yes.

Smith:

But when persons take the initiative and employ technology to reduce wastage to contain their costs in other jurisdictions, an example is Florida Power & Light. They joint venture with companies that provide consumers who use electricity with monitoring devices that help them see on a daily basis, an hourly basis exactly what they are consuming. That gives them the ability when BEC's bill or BEC's meter is in conflict with that device-- they have some means by which they can say that something is wrong here, rather than say something verbally, depending on BEC's meter or BEC's bill. That incentive programme benefits BPL and the country. If somebody wants to watch their consumption, these devices allow someone on an individual basis to monitor that. And, if you think about it, ten thousand, five thousand, one thousand people are able to self-monitor, because they want to do something that requires less production plant that BPL or the Bahamian people will have to purchase going forward in the future-- some incentive programme to encourage people. For example, I have a lot of clients that install energy saving devices, who have reduced their monthly consumption by as much as 10, 30 or 40 percent on a monthly basis.

The other thing I have a question (about). On page 22, you have Appendix 1 Consumer Summary by Class, and you have Street Lighting 5. Could you indicate to me what that means?

Cambridge (URCA):

I could not tell you, I don't want to speculate what it is. I will put a note next to it, and seek to get an answer for it.

Smith:

Another thing-- On the street lighting programme, a huge amount of electricity that BPL and the Bahamian consumers are paying for is literally being wasted by BPL, and the government and the Bahamian people are paying for are being wasted by using high pressure sodium and metal halide lights. They waste as much as, depending on the engineer you talk to, anywhere from 20 to 30 percent. We participated in a project in Florida; we participated in a project in St Lucia where they reduced their street lights by as much as 58.8 percent, just by changing out those street lights. I know an important factor there is the cost. There are companies that are currently available. In fact, we did an audit and we know that the Bahamas has about 46,000 street lights. If you run the numbers on that you are talking about a substantial savings, just by changing out street lights, and we would be interested to talk to BPL and the government about making that happen for the benefit of BPL and the Bahamian people. There is a lot more I would like to say, but that's it for tonight

Cambridge (URCA):

Thank you Mr. Smith

Smith:

When we do electricity audits or energy audits for clients, one of the things that slows up our process with producing reports is getting historical information. I know when BPL and BEC was changing over from the old billing system, or the billing form, to the new one you, could not get historical records going back more than several months. Has that been corrected? It slows up us presenting proper reports to clients on electricity or energy audit. Can clients get historical records going back more than six months? And not summary reports-- I am talking about detailed BEC bills

Cambridge (URCA):

It is my understanding that that information is accessible

Leonard Delancy:

A few points I would like to make, one is regarding the fuel surcharge. I just recently installed an energy monitoring device, (from) which I can see energy usage since Saturday. It is showing me detailed information that these guys talked about. I have also been reading my meter because of the influx of BEC's bill, and I have been questioning BEC about the cost. With this exercise can there be a way that they can publicize on their website what the current fuel surcharge is for this period. I have an Excel sheet that I created that gives me a forecast of what my bill should be. I

usually have to call back to find out what the fuel surcharge is during this period. If they could post it on their website, I could accurately update my sheet rather than calling them.

Cambridge:

So you are requesting more real time information.

Delancy:

I have a complaint in with them with regards to my meter reading for the past two months, meter reading as it relates to the accuracy. Because of some influxes in the past, I have been reading my meter myself taking (a) picture on the 21st to make sure that I get an accurate meter reading, and for the past two times, the meter readings have been off by a week. My complaint is with them, but I guess I will follow up with you guys if nothing come of it.

They've changed my meter recently, but I've seen here under meter accuracy and another section where they issue a certificate of protesting of the meter.

They changed my meter without any notification. They just came in. I watched them on my CCT camera. They came in changed the meter. I did not get a report to say what they are testing, what the result were. If stuff like that could be brought to light that would be good.

Maillis:

I want someone to go to jail for these stealings. I am going to ask the government; we need a house committee with power to send people, and persons to bring to light how many breaches are known of this pipe line, how many millions of gallons are missing, we need it stopped. And who is covering it up? This is a serious thing-- the pipeline going up through suburbia, periodically causing disaster. That is the environmental part, but it is your fuel surcharge that we are paying for. And people are running bulldozers, and some of it might be going into gas stations for all we know. We talking about huge tanker trucks filling up out of pubic-paid-for fuel. So when you write up your final report for your bosses, put it in strong language. I was being quiet because I wanted to see who is being prosecuted, but this needs to come to light. The other people when they hear how this is being done.

I did not know, but if I had known that you could dig under a road and stick a pipe and not cause oil to go all up in the air and start tapping it like they do in Nigeria and other places, I might of brought this to light in November. Other people might have seen backhoes doing mysterious things, going the whole way up Carmichael Road or smell diesel. We need to stop. We need BPL to get its operations honest, streamlined, cheaper, so that those expenses of capital improvements and fuel expenditures don't have to come back to us. We've got to get our cost down.

Audience member:

I am shocked, 'bout what-- I am shocked 'bout what I am hearing. Are you shocked? Is BEC shocked by these revelations?

Cambridge (URCA):

I can't speak for BEC

Audience member:

Well BEC is here! I am shocked

Cambridge (URCA):

There have been some articles in the newspaper about violations of the pipeline. I don't know if the magnitude has been revealed as Mr. Maillis has revealed here this evening.

Audience member:

I am looking on page 19, where they say the standard of services. The first time I heard about this outage notice, I was shocked, because I am thinking BPL, BEC has never said that we are going to cut off the power for a certain time. I've never remembered hearing about some announcement towards it.

Cambridge (URCA):

I know that there is some posting of planned outages and community announcements. I've some stuff on social media about planned outages and current outages. Maybe they need to expand the stations that they use. Maybe (in) a part of this document they should list the stations that they use.

Smith:

I just want to suggest a recommendation, and make it mandatory because of my own personal experience. BPL, BEC and the government encourages energy conservation, energy savings. We've had several clients where we have done that for those clients. And we were monitoring those clients' BEC bill and meter readings several months after the installation, and we were noticing that BEC's or BPL's bill, but the utility bill did not match the utility meter. And so we call the utility person and say that this is your bill, and this is your meter, but these two don't agree. The manager told us that he does not have to come to the site to read. The client said that he did not come to read it physically. You can read them remotely. The gentleman was leaving the utility plant to read the meter, but he was not coming to read the meter. And so what I would like to suggest is that it be made mandatory that when the utility company is going to change persons' meters to let the client know

Audience member:

If someone is dispatched to go and read meters, their schedule could be posted that your meter reading will be done this period, because I saw something that said every three months. I understand that they do it every month but that is kind of conflicting.

Cambridge (URCA):

That speaks to the standard that you would not go beyond that with estimated readings

Delancy:

We want to be certain that the person is actually reading the meter during that period, because my bills and my readings were like a week later.

Maillis:

I want to add some more. I live on a farm and there are eight houses on the farm. There are eight different meters and everybody pays their own account. The Friday late afternoon before the Independence weekend, somebody came out there to the property, and they were going to cut off my mother's house electricity meter, and this an 86-year old woman, and she had not received her bill in the post. Is the public required to go looking for their bills if it does not come in the post or you could pay it when it comes? There is a deposit in place.

This man was there and if it was cut Friday night she would have had no hope of getting it done before Tuesday, and that was disgraceful because my mother does not owe bills. There is going to need to be-- On the one hand, BPL needs its money, and on the other hand, there is a lot of slackness, especially a lot of high end politicians, who have been allowed to run up huge amounts of money. But there is going to need to be a sensible policy on cut offs to make sure that people actually received their bills. Sometimes they (don't) come in a bundle a week later. The post office is slow, and people don't know. People might need cash, they might need cash that weekend. That is what we figure was going on. There were two other houses that were delinquent and they had to go scrambling down to deal with it. But my mother-- It was wrong, and you got to make sure that that does not happen to the public. There needs to be sensible, practical humanity to it all.

What the gentleman was talking about with defective meters-- I have a sister with a catering business, and there was a huge BEC bill, which she kept disputing. And in the end, they admitted that her meter was defective, and they took it and still insisted she pay, even though they admitted that the meter was defective.

**Appendix B—Transcript of the Town Meeting at Doris Johnson Senior High School on 15
August 2017**

Winton Meadows Resident:

I have a few questions. I appreciate that BEC send out their billing on the computer. I have gotten the bill for May, and I know that in the next few days I will get my bill. I heard some comment today on the radio, and I am one of them. Through something that happened years ago, I read my meter every day at 8 o'clock in the morning. So naturally, when you speak about this billing coming out in estimate. When I get the billing, I would appreciate that you have the current meter reading, then you have the previous meter reading, and then you have the billing period. Sometimes, you only get the amount. What really is important is that you get the fuel surcharge. I could not tell you the fuel surcharge until three months after. I think it could be a little bit more detailed, then I could know if it is estimated or whatever. Has URCA anything to do with the maintenance in BEC?

Cambridge (URCA):

URCA has a monitoring function. So as far as the quality goes, we will monitor so many KPIs as they fall off from where they should be. It may have some maintenance implications, but as far as the maintenance, other than individuals lodging specific claims with regard to service or quality service issues-- no.

Winton Meadows resident:

I can go back to over 15 years ago, and I spoke to experts from one of the biggest companies in the world. A generator company from Switzerland and I heard some stories. Does URCA have a say in when we buy generators?

Cambridge (URCA):

Yes, the legislation provides that URCA will speak to the generation mix. It does not have a say in which units are purchased or whatever, but URCA looks at it from how it affects the whole provision of the service, the rates and what have you. There are different rate setting mechanisms and some of them allow you to take into account the asset of the generator.

Winton Meadows resident:

And why I ask you, I don't know where the generators come from, but I know for a fact there was a time when we had 5 different generators. So, if you have a problem, you need parts from 5 different companies. And this is why I ask you the question, because I think it is important to have generators from the same company, so you have the parts. It happened here before that you have no parts. I have friends who worked there at BEC, and he told me there was no parts. And this is why I asked if URCA...

Cambridge (URCA):

In the evaluation in the type of equipment URCA would be taking into consideration standardization, but at the end of the day it is a BPL management decision.

Winton Meadows Resident:

Tree trimming, if you have a tree in your own yard you are responsible for it. If it is on the government's side, it is coming now to the hurricane season, BEC has to cut them. And one more thing, electricity lights on the street-- I have problem (with) my focus. When I drive is that way, not that way, it is that way. When you drive on the airport road and you see that every second light is on during the day. Who pays for it? The consumer pays for it.

Martinborough:

I see your consumer complaints about damage to electrical appliance and spoilage. The next point there is normal wear and tear -- the power company will not honour claims due to normal wear and tear or failure of equipment of the transmission and distribution system. So whose responsibility is it to maintain equipment?

Cambridge (URCA):

Which page?

Martinborough:

It says here under consumer complaints-- damage of electrical apparatus and spoilage, etc. BPL will not honour claims due to, and the first one-- normal wear and tear of the transmission and distribution system. Who is responsible for that system and why should I pay for my damages, when their system does not work

Cambridge (URCA):

That is the type of feedback. If you feel as though that is not reasonable, then that is why it is out for public consultation.

Martinborough:

You said it is how we interpret the information. So now I am asking you-- how do you interpret it?

Cambridge (URCA):

I interpret it the way you see it there

Martinborough:

I disagree with that.

Number 2: Third party damage or interference to the distribution system, including acts of violence, arson or sabotage. Why do I have to pay for that?

Cambridge (URCA):

Do you disagree with that one as well?

Martinborough:

Yes, I disagree with that.

What if you have someone who has a problem with BPL, and decides to run a car into a transformer, and I lose all my stuff in my house because of a surge in power. I got no claim because that man decided to destroy the equipment. What are they responsible for? So no sense you writing a claim to them.

Cambridge (URCA):

Write down all your objections then submit them.

Martinborough:

One more question, what the gentleman was saying was right. If you go down the Eastern Road, you can find transmission lines tied together not sealed properly and if the wind blows they pop loose. Then you lose power, then you have a power whatever, and they lose a transformer. You lose your computer, then they tell you that you did not have a proper surge protector on your computer, and you did not secure your line either. So who's at fault? I think the question is maintenance of the power system grid, which comes into play and they are just shunning all responsibility to the consumer when something goes wrong. I wish I could supply you with power with a generator, and if anything goes wrong with that generator, you can't blame me. Does that make sense? So I think they share in the responsibility. So what we paying them for? As the regulatory body, you should be regularizing them to make sure they are delivering the proper standard for supplying the electricity.

Debbie Deal:

I'm Chair the Energy & Environment Committee with the Chamber of Commerce

Wouldn't BPL have insurance like a contractor has all risk insurance. Maybe we could suggest that BPL have insurance in place for sabotage for whatever. Wouldn't that be a good suggestion?

Cambridge (URCA):

It will be subject to the normal assessments, even from the insurance perspective remoteness, third party involvement that type of thing. Like I said, if you have a specific issue like the gentleman said, like normal wear and tear, maybe they don't go far enough to specify what is normal wear? What does that mean? In the industry there are reasonable maintenance standards and if they are maintaining those-- I forgot what the legal people call it. Once they can show that, they are exercising the normal due diligence. They may not legally or technically be at fault. Again, if you feel this is too vague we can ask them to address that one.

Chris Justillien:

I am a musician and a faculty member of the University of The Bahamas. I am involved in the recording business as well. I have a recording studio at home, and I have a lot of friends who have recording studios at home, and we have very sensitive equipment, particularly computer equipment. Over the years, I've lost four computers, and each time, and I have friends who've lost equipment as well. When we go into the power company, it is just frustrating. They don't tell you 'no'; we just give up. And so many consumer that I know in our industry just give up, because you

spend too much time, wasting time at the office of BEC, just trying to get some results. Right now, if I had to put a dollar value to it, it would be well over \$20,000 that over the past three to four years that I've lost personally because of power outages. And we buy the equipment to protect our equipment, and it is still a problem. I have a generator that I purchased-- a 20 K generator that I put on my home. I'm burning diesel. When the power comes back on, because it is low voltage, so that is costing me money although I have a generator. There has to be something that can be done to make sure that the power that is coming into our homes is of good standard, and if it is not, and it is destroying our equipment, what recourse do we have? And that is not to mention small appliances; I've lost two freezers, televisions, toasters, irons, deep fryers, and the list goes on.

Cambridge (URCA):

Can I ask you a question sir? Have you filed a complaint?

Justillien:

Yes.

Cambridge (URCA):

Did you receive a response to your claim? And was the response...(did the response) meet your satisfaction?

Justillien:

No, there is no response to the claims. It seems as though you are talking to nobody. We go there, we fill out the paper work, we go back. They ask you to get estimates from a licensed electrician or whatever. You bring that back in, and you call, and it is just a waste of time. That is why I came here tonight I drove all the way from Carmichael Road, just to say that to you.

Cambridge (URCA):

We appreciate you coming, and your point is noted and will be included in our report.

When you looked at this document, did it give you the satisfaction of the process of putting in a claim?

Hepburn:

I have a question concerning billing. Over the years there has been some variations. Number one, I am trying to look through the document and there is nothing here speaking specifically to surcharge. In the appendix it just says "Insert here," and it refers you to the website. What is URCA doing to make sure that we are being protected from fuel surcharge, because that is usually the bulk of the bill?

Cambridge (URCA):

The surcharge is the actual cost of the fuel that is used to produce the power at that time so, that changes with the cost of fuel on the market, but if you feel as though, there is a need for them to

have transparent process or an explanation as to how the fuel surcharge is calculated so that people could have a better appreciation for it...

Hepburn:

There are two concerns about that. How do we know when we are being charged for the fuel being produced within that period rather than previous periods? The second thing even when you get bills, for example, even after hurricane Matthew, they pulled that thing where they said that we are going to bill ahead of time, because the billing system could not handle it. Even though their own centers did not know what they were talking about, because they were telling you different stories. So how can they ask for money ahead of time, especially after a hurricane Matthew disaster it does not make any sense at all and you almost had people have a heart attack because of the high bill. I remember that in either 2012 or 2013 I had a bill for \$1,500 and we don't run A C like that. So how can you have a bill for \$1,500 for a small home that does not run as much. And when they bill, they always bill for 28 days, but sometimes you have to wonder, if it is for 21 days

Cambridge (URCA):

In my review of the , I don't see anything on billing during natural disasters, and maybe that is one of those things, that we will need to look at from a consumer protection point of view. So we will take that as a point as well.

Hepburn:

There is something fundamentally wrong for me to pay for a service that I did not have, and then we do not have the right measurements for it.

Coming back to fuel surcharge-- Is there any push for them to phase away from fuel and getting into solar energy, so we don't have to keep paying for fuel surcharge?

Cambridge (URCA):

We have a small scale renewable generation programme in effect where individuals can apply and install their own solar system to either supplement, or if they choose to go totally of the grid, they can do so. The information for that is available on BPL's website for residential consumers and small commercial consumers that information can be found on URCA's website.

Hepburn:

I understand that but we are talking about a powering an entire country that is known for sun, sand and sea. So how come we don't have a hand pushing them toward solar and alternative energy?

Cambridge (URCA):

The Electricity Act also speaks of the generation of solar into the generation of electricity mix. That actually puts a statutory requirement on to the utility to give preferential treatment to renewables, as they grow their capacity going forward.

Hepburn:

I get that, but reading through this document, I really don't see it in here. That is one thing that will really protect the consumer.

Cambridge (URCA):

We'll that does not fall into the consumer protection plan, but it is being addressed in the renewable energy plan. It is another area that we are working on right now. We are feverishly working on a document for the second phase.

Phenton Neymour:

I find this amusing that I am sitting back here asking a question. The reason I took the microphone is because I want to help answer some questions that were answered earlier. Mr Cambridge, you are better politician than me because you navigated around some of those questions better than I would have. The reason I want to make the point here is there was a Bill that amended the URCA Act which allowed for energy and water to fall under URCA. What is interesting about that Act was that Act was put to the House of Assembly by the Ministry of Finance. I think Zhivago Laing, and it was seconded by me, and I spoke to certain aspects of that Act, and what the intent was, as to why you are here now, which will answer some of the questions that you raised.

First of all, the original intent was for URCA to address some of the consumer issues that customers have, because BPL is not only a utility, it is also being used as a regulator. So, in other words, it has two roles which it really shouldn't have. It should only be a utility, but in the meantime, it is telling people what the rules of the industry are, which is unfair. So in other words, the poacher is also the warden, which is wrong. So, the intent was to take these issues like your appliances, sir, away from BPL and give it to URCA, so your file will go to URCA, and URCA would determine whether BPL should pay the claim. That was the spirit of the Act. That is not so, and I say that so that the public knows that that is the spirit of the Act, and the spirit as to why you are there.

It is wrong for BPL to be not answering you, which I know they don't answer people because people call me, because they haven't gotten any answers, so I know that happens. That needs to be corrected, but there is also another issue that I raise, which is something that happened to me recently. Mr. Rutherford knows this in detail, and the reason that I am here to URCA is to make a complaint, and I don't think this issue should exist.

I left my home; I relocated for 8 months. I left my wife and son in the house, so there are two people in the house now. They are there. I left in May, my son goes to college in August leaves my wife there by herself. She moves out, the house is empty now. Then the hurricane comes where there is the estimate of the bill. So my bill... What I find out... So I am paying this bill because BPL says pay this bill, I will adjust it. The adjustment I know happens, ladies and gentlemen, because their final readings, they do have readings. So they will adjust it in your following subsequent billing, which I think BPL says that they will do. Once your meter exist.

My problem is this; they adjust it because they go by the number, so your following bill will be lower than the previous one – they do it. The principle is wrong. The issue is when I returned in December, only to find that my meter was removed under the assumption that my meter was not working. Well no one was in the house so there is no consumption. My problem is not the adjustment you know, because I came I saw the meter changed. So I went out to look, because I wanted to adjust. So your meter reading is also on you bill, so you can go and reconcile your billing with the bill. So, I went to reconcile, only to find out that my bill was being estimated because there was no meter. Now I go to BPL, and say 'BPL you changed my meter.' The billing you gave me for four months when no one was in the house is based on last year's consumption, which is higher. Give me my final reading of the meter, so that I know now that you know that no one was in the home. We can adjust it, and you give me a credit which should be done. The problem is that BPL has a policy that I can't see the meter. That's their meter. The point that I am making is that, if there is an adjustment or changing of a meter the customer should have the right to inspect that meter because in your billing you said the meter is field tested. In your document here I just quickly read it. I don't have a copy, so I can't see that. So, a customer should have the ability to review their billing.

Cambridge (URCA):

You are saying that a customer should have the right to request finalized readings of their meter or some type of report or document stating that this is what was done to the meter, and this is what the final reading was?

Neymour:

If I had seen that final meter we could have come to the conclusion what my final bill should be and everything would have been resolved. The problem here is that BPL is the regulator and the utility.

Cambridge (URCA):

They are no longer the regulator. We are the regulators.

Neymour:

Yes, they are the regulators. If you look at the Act, BPL can tell someone whether they can have some form of alternative energy to their house or to their facility.

Cambridge:

No.

Neymour:

BPL in the new Act, I object to that.

Cambridge (URCA):

I will have to go back and check on that.

Neymour:

The problem with the new Act that just came in to force where BPL has regulatory responsibility in the Act, which should not be the case.

Cambridge (URCA):

We will talk about that afterwards.

Stephanie Ferguson:

The comment I have relates to some of the points that were raised earlier. Today, if there is a power outage... I live in Yamacraw Beach Estates. If there is a power outage, my refrigerator will not come back on when the power comes on. I need to be home, because if I pull the plug out and reset it it will start working again. I have lost a lot of stuff because on more than one occasion I have not been home and I do have a surge protector on it. So my question is what needs to be done to avoid this issue? Also, in speaking about the hurricane, we were out of power for two weeks or more. I am also on a water pump and trying to catch a shower here and there from my friends and family, but my bill was higher during that period that it is normally and they could not understand it not having power for two weeks.

Cambridge (URCA):

We will take note of that. That issue may be similar to the woman in front of you.

William Carroll:

I have two concerns. In the document it says that in residential areas they should read the meter once every three months, and you could have two months estimated bill, and they say the estimated bill can take an average. And you heard everybody in here talking about during the hurricane, and I experienced the same problem here and in Long Island. The bill was almost twice as much as the previous bill for last year for whatever reason. I want to put in that document that if they cannot read your meter, they cannot send a bill until the meter is read. Or the alternative is if they estimate the bill, the bill should be the minimum of the last bill of the previous year. So, at least they will be getting some money, but they will be over charging the customer. Right now, what they are doing is double and triple over-charging the customer.

Cambridge (URCA):

I like that you expressed what the issue was, and you proposed some solution that would be acceptable or apply the same kilowatt usage from the previous year.

Carroll:

You estimating the bill in the winter months, but you ain't burning no air condition. They are talking account for the summer months when the average is real high. Take the smallest bill from within that year.

Cambridge (URCA):

So you are saying the whole process of estimation needs to be better outlined. Things like seasonality, and all the rest of them needs to be taken into account.

Carroll:

The other one that I saw on the document is that if you request a meter test, and they say that they find it faulty you can be charged \$25, and if they find it working you will not be charged. I don't understand it in the document.

Cambridge (URCA):

I won't speak for BPL, but you get some people who come up with these frivolous complaints whenever they don't want to pay the bill. The meter ain't working and you go through the whole exercise of testing the meter. They are stalling time trying to get some funds to pay the bill.

Carroll:

I think you misunderstand what I say. In the document it says that if BEC finds that the meter is faulty you get charged \$25, and if it is not faulty it is zero. Look at the document.

Cambridge (URCA):

Maybe that is a misprint.

Carroll:

It was here last week and I got a document. I don't know if you all change this then.

Cambridge (URCA):

Which page was it?

Carroll:

Page 21

Cambridge (URCA):

There seems to be a mix up.

Carroll:

I can't see why they will charge you if they see the meter not working.

Audience member:

Let me congratulate BPL, the government and URCA for making such a document available to us. I want to say while Minister Neymour is here. If the government had done with BPL what they did with the airwaves, we would not have been here today discussing the monopoly called BPL. I am suggesting and recommending that, we as Bahamian people, advance to our government access to more than one utility company. We are a democracy. I want to point out one or two things that you need to consider. First of all, your website does not have the rates that you indicated here.

Cambridge (URCA):

BPL's website.

Audience member:

I'm sorry, BPL's website does not have the rates that you indicated here.

Cambridge (URCA):

What rates are they? The tariffs...

Audience member:

Yes.

Cambridge (URCA):

The tariffs should be there.

Audience member:

It is not there.

BPL's website... recommendations looks like a \$300 investment company. It is not user friendly. For example, if you go to BPL's website and you try to search something, there is no place to search. There is no simple user friendly tool bar to search for example "rates". The gentleman is quite right. You cannot get a printout of a bill going back twelve months – That's not possible. In fact, the summary bill that he is talking about is what they give you and you cannot do a proper assessment. Just a recommendation on a few things that I heard-- Customers send in complaints to BPL, and URCA wants us to first resolve it with BPL, and that if it does not get resolved then come to you. The problem is that some system needs to be put in place, so when I send a complaint in I could carbon copy somebody so that if BPL say that they did not get it or that I did not make my complaint then I am at a disadvantage. As Neymour said that BPL is the regulator and the supplier. I am at a disadvantage there. There is another question that I need to ask. Where are the BPL's bills printed now they say a lawyer does not ask a question unless he knows the answer? This is 2017, where are BPL's bill(s) printed and distributed to the Bahamian people from? Do you know?

Cambridge (URCA):

I don't know.

Audience member:

Not in the Bahamas I'm told.

Cambridge (URCA):

I get a computerized bill.

Geraldine Charlton:

I have a son that has been going to Miami Children's Hospital for 28 years. He has a lot of medical problems. He has survived cancer and four tumors, and he has allergies to even grass so my air condition cannot turn off. I've seen a \$2,000 bill that I had to pay. I am not working because he is a 24-hour service child. He is feeding through a tube and there are times when I had to go to social services to get the \$600, and by the time I get the \$600 my bill is already up to \$700. I don't know if URCA can help me in any which way. From 2013 to 2015, there was a \$2,000 light bill that I was paying on. I was paying \$100 per week. I am not working and does was done until social services was able to pay it. Social Services pays once per year, it has now reached \$1,000 and I have to try to keep that down.

I still have to be at Miami's Children's hospital every three months because the tumor came back in his eyes three times. Therefore, I had to go back every three months, and BEC was very favourable. Whenever I was going away I would go into them and let them know. Even though I try to pay on the bill I always have a balance-- an overflow. When I get back, that kid needs his air condition. When the storm came, my whole roof was gone. The water was coming in over the light fixtures over the child's head. Urban Renewal is just fixing the house today, because the whole roof was gone. I had electricians come in to check it out to make sure that I did not have any problems. Since Social Services paid the \$600 I have been trying to pay the balance.

I have an electrical pump and I've gone to Water & Sewerage to try to get them to turn over the water to government. I have an air condition that does not turn off. During the storm I had to go to the Red Cross because there were no 4D batteries available. I have every kind of those 10 inch fan. Whenever the electricity is off I have to put a sheet to the door to keep the cool air in as much as possible, and put the fan on that kid, and hope the electricity would turn on soon. I want to know if there is something in that Bill or what URCA could help me with. I just got my bill down to \$800. Whenever the father sends money to me I would have to take that money and put it on the bill so I have been trying to put \$100 every time. When there is no money I would try to go to \$30 or \$20 to let them see that I am trying. I haven't gone in to BPL to have this conversation like I had with BEC.

Cambridge (URCA):

I am getting some signals from some BPL representatives in the room to have you speak with them afterwards. This speaks to vulnerable consumers, but I believe they have some mechanisms in here to deal with that.

The BPL representatives are here in the capacity as observers. So if they don't answer you, don't think that they are trying to avoid you.

Audience member:

I just see in the document that rates for electricity are available on BPL's website. I am on the website right now, and I don't know where the link is.

Cambridge (URCA):

I am getting the feedback that the website is not user friendly or the information is not there and when I go home this evening I am going to browse that website myself, and if they don't at the next meeting, I am going to point out who they are.

Audience member:

I am looking on Google too and they are not there.

Cambridge (URCA):

BPL rates cannot be found on the website.

Audience member:

The only that that you can hit besides the bills are the old announcements. You can't see any other documentation.

Cambridge (URCA):

That's another one they need to update-- their website to make it more user friendly.

Audience member:

We are having public consultation for URCA to protect us if BPL is going to impose certain terms and conditions on operating receipt, is that correct? Has URCA had sight of BPL's business plan or management agreement?

Cambridge (URCA):

URCA would have had sight of BPL's business plan but that does not come before the consumer protection plan.

Audience member:

You are seeking for my regulatory neutral position. I ask the question because if you have seen the business plan or management agreement, this could be an exercise in moot public relations because we could be doing something here that contradicts the business plan and management agreement.

Cambridge (URCA):

It was done with full sight of the business plan. As a regulator you have to take in to account what the utility has available to them. What the consumer is prepared to bear. What would be the most efficient use of the resources at hand at the time. It is also based on this whole principle of incremental enhancement.

Audience member:

I appreciate your response because I know that the government is trying to decide on whether they make BPL business plan public or not. In the spirit of accountability and transparency just as

was done with the Baha Mar document, those portions that could have been made public. It would be in the public's best interest, the government's best interest, URCA's best interest to encourage the government to make that available. The CEO of BPL said that one of the exercises that they are about to engage on is fuel hedging. Now that is good, if they are able to accomplish that, because that fuel surcharge that the lady was speaking about is about 50 to 60 percent of BPL's bill. The question that I have is that I have not seen a competitive bid go out for fuel for more than six years. The CEO of BPL talks about negotiating fuel hedging options as one of the mechanisms, but I haven't seen any request for proposals go out to the general public. Those of us that are in the industry or in the business can assist BPL, URCA or the government with that process. And, if it has not been done, I am saying publicly that BPL and URCA ought to consider putting those things out for the public, particularly (to) those in the industry to participate and be a part of that. So, before they sign a 15-year contract and tie us in to a bad fuel deal, make sure that everybody has an opportunity to present their options

Audience member:

Can you give me an example of when you had to refuse or use right of refusal?

Cambridge (URCA):

Let us bear in mind that this BPL's plan. This is not URCA's plan. An example would be if you had a customer that was doing something sensitive to the equipment; so, they want to supply within voltage and frequency deviation that is a bit onerous something that would come at great expense to the utility company; or, if you had a house that was far out or remote or far away from the established network and it required building for a pole, a significant distribution of assets to reach you which deplete the utilities exposure in terms of losses and capital contribution and all the rest of that. In a case like that it may be more advantageous for them to say 'we will give you your own generation license and you can provide your own power', because basically what we have throughout BPL's territory is a unified tariff and so any expenses are basically shared across all consumers. So, you don't want to have one consumer with special needs or their own little data thing, because it is driving up the cost for the majority. So, you do what is in the best interest of the greater good so to speak. And I think people would have seen it to a smaller extent when you build in an area, and BPL tells you that you have to make capital contributions and you will get certain amounts back if individuals move nearby. From the regulatory perspective, you are trying to provide the services to as many as you can and with as a high quality as you can, and you are also trying to make it as affordable as you can. So, you are balancing a lot of things in the midst, and that is just the obvious one. There are other little things under the surface that you have to (consider).

Audience member:

I don't think it is fair that they can refuse to provide power

Cambridge (URCA):

Let's say you had a little cay 2 or 3 miles off Eleuthera.

Audience member:

When you are talking about a cay that is different.

Cambridge (URCA):

Just say you were located in a very remote area of Eleuthera that was undeveloped, and you needed power. Well, there are two things they could price it for you at cost, which most people tend to say that is not fair. I am from The Bahamas I should get it like everybody else. Then you have to consider the capital cost of getting that power to you and you alone really is not fair to 180,000 consumers.

Audience member:

What happens when other persons come to the neighbourhood?

Cambridge (URCA):

The way I understand it to be now with the capital contribution process is that if other persons come into that area within a certain period of time, which is calculated based on the value of the assets and the lifespan of the assets it takes to provide you with electricity, you would be reimbursed whatever your contribution should have been.

Audience member:

What if something happens to your equipment?

Cambridge (URCA):

If you have something happen to your equipment and you actually have documentary evidence as to what the frequency deviations are, they would consider the breaches, and you would be able to enforce your regulation based on common law negligence stuff or based on what is in the plan here.

Audience member:

Power went off, then on, then off then on and after that the equipment was busted, how else do you recover?

Cambridge (URCA):

I tell people all the time when I get these types of questions—document, document. When your light goes off, you document, when it turns on you document and you can document how many times it went off. The utility has a reporting obligation to URCA as part of the license and one has to do with major outages. So anything for a certain duration, they have to report, and based on some recent feedback that we have been receiving, we are actually looking at imposing on them a reporting obligation with regards to multiple outages within a certain period of time,

Audience member:

A scheduled power outage for Governor's Harbour between 9 am and 1 pm and they tried to put to put power back on literally about 5 times and after that my ACD unit, which my computer is connected to that, got busted, the actual surge protector-- the battery part of it.

Cambridge (URCA):

Did you report it to the utility?

Audience member:

Not yet, I recorded it

Cambridge (URCA):

The thing with that is you need to get that recorded as soon as possible, because there is probably someone else out there who had equipment damage and the utility is going to say you are the only customer out there who had appliance or equipment damage. In terms of affecting issues or incidences because you are a part of a common network, and if there is an issue and multiple consumers tend to see that issue; but if multiple consumers remain quiet, then the lone wolf out there appears to be a person who has a problem that is specific to their location. The sooner the utility could get those in, the sooner it could evaluate or assess the situation, and see exactly how many consumers may be affected and their degree of culpability or their liability.

Audience member:

What we know as a power surge, does that come from voltage deviation?

Cambridge (URCA):

There are power surges in this section right here—transient voltage, just in the natural operation of a system. As you are disconnecting load and putting load on, you will see some transient voltages, but the utility is supposed to have protection equipment that would maintain or curtail anything that goes to levels that is dangerous to isolate. You will see as generators are on loaded or off loaded or circuits are energized or deenergized, you will see little variations and that is allowed in the industry, just as part an inherent part of the process.

Audience member:

Can the voltage deviation in some instances lead to fire?

Cambridge (URCA):

During the normal course of action it should not. If you have fire, fire is normally due to poor connections and sparks and stuff like that or really, really extreme voltages. With normal operation systems it should not.

Audience member:

If it has been deemed as a result of voltage deviation and it is reported. Should it be reported only to BPL, or should URCA be copied in on the correspondence?

Cambridge (URCA):

You are well within your rights to copy URCA in on it, but when you start talking about voltage deviations in general or damaged equipment because we get to consumer complaint section and dispute resolution process—that speaks to how the first line of the submission should be at the utility consumer desk and then they have some information in there on how to calculate (convey) that up to management and the executive management. URCA likes to think that you have exhausted all of your efforts with the utility. We understand too that sometimes that the frustration level causes you not to proceed or disinsensitize people to pursue their claims. Or, you can copy URCA in from the very beginning, so that we will know that the process has started. What I tell people is that anything that happens, (gather) as much documentation as possible. Someone mentioned fire—If you could get the police fire branch to give you a report, the more information you have to support your claim the better. Think of it as if you are building a case.

Audience member:

One thing that I've found out when you go to complain about the appliances that have gotten damaged, this is BPL's response. They always want to make you feel as though it is your equipment that went wrong, and it has nothing to do with BEC, and then they argue with you and almost want to make you feel as though this ain't worth it. They will turn you around and around and around and you will write and check with every desk, and go to everybody, and most times the earliest you hear from them in six months.

Cambridge (URCA):

I think in here they speak to that. In this report they said that they will get back to you within at least 21 days.

Audience member:

I am happy that we are on this like Mrs. Burrows said. It seems like they are hoping that you get stressed out to the point where you don't push it. Recently, we traveled and came home and met a busted air condition unit. We did not know when the power went off. We don't know what happened, but we knew that we left a perfectly good working air condition unit in the house. It is the summer and you are not going to be waiting for someone to come by after 3 or 5 days. You need to get your unit replaced, and then they are asking you to give them an idea of how much you paid for it and all of that. Who keeps receipts like that? It is almost as if the consumer really has no advocate and you are like the lone wolf stressed out and can't get an answer to replace your stuff, and I really don't think the Bahamian consumer is protected.

Cambridge (URCA):

I just want to add that at URCA we have a help desk, and so the consumer does have an advocate. We have a few staff members that man a hotline and you can call in, but again they are going to ask you the same questions. Which period were you absent? When was the unit last found to be working? How old is the unit? What type of unit? You can go online to find out what the new prices are. And you will do some discounting based on age. Even in terms of the normal process of resolving a complaint you will not get a 100% reimbursement.

Audience member:

I would like to know who pays for people to come in and assess your equipment when it has been damaged. I had an incident Sunday morning here in Palmetto Point, where the electricity went off three times and my stove has an electric pilot. One of the pilot(s) came on and it just kept ticking, ticking and I could see a little flame coming from it and of course I was ready to run out of my house but I had to call an electrician who had to disconnect something under there. Sunday morning—because the pilot keep flickering that was after the electricity went off three times, I did not report it. We had to pay an electrician.

Cambridge (URCA):

This is the main thing that needs to happen.

Audience member:

He said that we need to buy a part now for that to be replaced.

Cambridge (URCA):

Most people do not report incidents; that is why the utility will get away with it. No matter how small it is, and maybe part of what needs to happen is the process for lodging a complaint needs to be made more user friendly. Most modern utilities are providing things like apps and stuff where you could just pick up your phone and send in your complaint maybe that is where we need to go.

Audience member:

I know many years ago BEC always had posted in different sub stations a notice, where they encourage you to have all electrical equipment plugged into a surge protector. I have known of persons who would have gone out and purchased surge protectors and when you had the differences in voltage deviations, they still lost their equipment. And so, when they would have gone into BEC, they were told that they purchased the incorrect (unit), or it was not in fact a surge protector. So, if that is still the position with BPL, is it mandatory that you buy it from them, or they have some literature that says to you where you should go to get this, because everyone is not savvy and does not know, or they may very well purchase something that they think is a surge protector and it is not. Or, (it) is that just a general cop out, so as not to pay persons who would have been aggrieved.

Cambridge (URCA):

I can't speak to whether it is a cop out or not. I know that not everything that is out, that people sell, that may look like a surge protector might not necessarily be the proper thing. I know that in New Providence they had a display in their office for what they regard to be the proper type surge protectors. We are going to be sharing the transcripts of our town halls with them. Maybe they can implement it as part of their consumer education. I am not sure that auxiliaries like surge protectors should fall under their responsibility, within their consumer protection plan, but what should be in their consumer protection plan is to provide you with the quality of service, whereby you minimize your need for that surge protector.

Audience member:

As a consumer, do I need to purchase a surge protector for each of my outlets in order to be able to lodge a complaint with BPL, if something went wrong? Is that the case?

Cambridge (URCA):

As a consumer, and as a consumer myself, you have to appreciate that not all instances of voltage deviation have to be BPL's fault. There are lightning strikes and things like that or acts of God. There are third party damages, where individuals may run into a pole, and cause the line to snap. As a consumer, you would want to have your own safety measures in place, or try to mitigate against damages that might not be BPL's fault. So, insurance and things like surge protectors are in that mechanism.

Audience member:

BPL can't use as an excuse for not compensating you that you did not have a surge protector.

Cambridge (URCA):

Not for an issue that was not BPL's fault, that will not stand up in a court of law.

Audience member:

Let's say you have a generator at your house, and obviously when the power goes off and comes on, you lucky if you live in an area where the power does not go off regular. You have a 100- gallon diesel tank. When you come home, you run the generator for two hours. While the generator is running, the wife wash and dry, cook on an electric stove. The problem with BPL-- Is this allowed or is this illegal?

Cambridge (URCA):

That is against the law. The standby generator exemption is only valid when the provider is unable to. It is only valid for emergency or standby situations, and also limited to 1,000 KW. This is in the Electricity Act section 50.

Audience member:

Is it different than if you have solar equipment?

Cambridge (URCA):

Solar is different because we have regulations in place to deal with small scale solar and you will find information pertaining to that on URCA's website, as well as BPL's website. Generators are only allowed for standby or emergency situations. You cannot run your generator when the power supply is on, as it violates the electricity act as well.

Audience member:

I've been trying to log on to BPL, where you could access your account to pay for the light, but no one could seem to tell me how to log on.

Cambridge (URCA):

I had that same problem. It is a bunch of zeros that you have to put in. It should not be that difficult. I will give you a number to call Peter Rutherford. He is the AGM of Consumer Services, and he is the person I called who walked me through the process.

Audience member:

BPL—There is a lot of dead persons still in their list of consumers, and I know at one point they were trying to get persons to come in to pay security deposits. I guess the challenge was for everybody having to come up with \$200 or \$300, just to get your name change(d) and bring those documents in. Couldn't they have an amnesty period, where you do the name change without having to pay that security.

Cambridge (URCA):

I can't speak to that part, because that will be the individual consumer contract with the utility, but once you keep your bill current but if they become disconnected that is where the issue lies. How do you collect from a dead person? What I do is encourage individuals to be proactive, and when the consumer dies, go down to BPL with the death certificate and with your document, especially if the account is current. Then there is more opportunity to have it transferred in your name with your documents in hand. The utility would be happy for that.

Audience member:

Do they have the right, say my father passed away, to transfer it on my bill.

Cambridge (URCA):

Not transfer it to a separate location on your bill.

Audience member:

It is not my bill.

Cambridge (URCA):

If you allow them to.

**Appendix C—Transcript of the Town Meeting at Patrick J Bethel High School, Marsh Harbour,
on 27 September 2017**

Keva McIntosh:

I have family of four. They used to read my meter, then I had a family of three and (they) did not read my meter. And now, it is only two of us and they are still not reading the meter and we have the same bill and that's how long it has been since they have been reading the meter. So we are paying for a family of four when there is only two of us there.

Cambridge (URCA):

Well, I don't know how to answer that. Just on a technical point of view I gather what you are saying is that your consumption has changed significantly, but you are still getting the same bill. That is a(n) easily verifiable thing, if you are getting bills, you can check the reading on that bill against the meter. But if you are finding that there are some discrepancies, then that is an area you will take into the whole complaints billing process in here. And if you follow the mechanism in here or if you have an issue with the complaints billing as outlined in here, then you can send us your comments and we will seek to have it addressed in the Protection Plan.

Audience member:

You mentioned that data logging of power up/down cycle voltages, etc the consumer's data may not agree with the power company's data and that you do that independently yourself. How do you check what happens when you are down in Nassau and we are up here?

Cambridge (URCA):

Unfortunately, we will not be able to do it retroactively, but what we can do once we have a complaint we will monitor that system. As the regulatory authority for the sector we have the authority to do spot checks. We do performance monitoring. That is the type of thing that we do, but we also have access to the necessary experts to do a kind of forensic analysis. If you are connected to (a) feeder with multiple consumers, we are able to survey those various consumers' installation, and if we find a common issue, then it points more to it being a common source. If you are a single user on a multifeed and you are the only person experiencing certain issues, then it tends to mean that that problem is isolated to your specific location, but it still does not mean that it is your fault. It could be the utility provider's fault at your location, but the likelihood of it being the utility provider's fault is a little bit less. Each problem tends to require a different type of analysis but the thing is what we like to stress from URCA's point of view is that we are independent. We don't take anybody's side. We come in and look at it as subject matter experts and we provide an independent opinion.

Audience member:

You mentioned that Abaco being number two on your demand list. Do you guys pay attention to Grand Bahama?

Cambridge (URCA):

This is BPL's plan. BPL does not operate in Grand Bahama. We are going through some discussions with them and the port on how we are going to regulate them. Once that is finalized they will be required to produce a similar plan. We are all in the same country, therefore, I know that there will be some comparative analysis between the two entities. They will have a different plan.

Audience member:

Some businesses and some residents might be interested in putting in solar panels. How is BPL going to handle that?

Cambridge (URCA):

That is another areas. That is not in the plan, but I can speak to that because we are very far along with what we call our small scale renewable generation programme, part of the whole national energy plan and the Electricity Act (EA). The EA states that BPL, going forward, has to give preferential treatment to renewables.

URCA was given the mandate to facilitate the integration of renewables in the whole generation mix. BPL submitted an initial plan, because that was the requirement of the EA that they submit a renewable energy plan, and it was divided into two phases – small scale plan and a utility scale plan. The small-scale plan allows for residences and small commercial entities to put in solar panels and systems up to a maximum of 100 KW. That is way more than anybody really needs in their house. So many homes and small businesses are covered.

For electricians in the house, for the residential consumer, basically approvals are given on your average consumer demand plus 5 KW, which means you are able to inject 5 KW back to the system supply, (for) which BPL will compensate you at the avoided fuel cost so that you get paid for the electricity that you solar system sends back to BPL's grid, and for the small commercial entities average customer demand plus 50 KW. That programme is actually up and running now. You can actually make application for residential solar system thru BPL and for commercial consumers you can find the information on URCA's website.

Basically, once you've met the criteria which are outlined there, which also involves the Ministry of Works providing approval, because anything you do involves any occupied premises must have an occupancy permission from them. So, they have to come out and do the necessary inspections to make sure it is structurally or electrically sound, and once that is done and BPL come out and do an inspection, because with grid tie systems you are actually connecting to the grid, so they have to make sure the quality and the safety parameters of your system meet all their functionality requirements. Renewables and solar are available today

Audience member:

Are there any provisions for the power company to do preferential rate if you are doing water heating systems from midnight to 6 am when supply is low?

Cambridge (URCA):

What you are getting into now is time-based rates. As I said, when we get into tariff setting jurisdiction, there will be things like demand time management, time of use rate consideration and what have you. Again they are aware of all these things. A lot of these things are being overseen right now, but they are being overshadowed by other things like terms of agreements. As URCA gets involved, these are the kinds of things that regulations incentivize and promote

Audience member:

You mentioned commercial being 100 KW or less, do big grocery stores fit into that?

Cambridge (URCA):

Some grocery stores and manufacturers, once you stay below the one megawatt range, because it is your average customer demand plus 50 KW. There is still some consideration given but when you start injecting... Primarily, when it is for self use, when you start returning or supplying power to the grid, the rate at which you are compensated requires a whole other contractual arrangement and study. To try and put it the simple way-- what happens is when you start to allow people to generate power from their own solar, and they are still dependent on the power company. When solar is not available, basically what happens is it is strengthening the power company capacity when they are supplying their own needs, but they are still able to rely on the power company when it suits them. Who pays for that capacity that you are avoiding the cost of? The guy who is still connected to the system. So he then gets penalized. So, there is a whole lot of things that go into this other economic branch that deal with that and that is part of the regulatory framework that we are working on for what we call the large scale utility scale solar. So once you go above what the residents and small commercial guy are using, you start to impact the financial stability not only the grid stability of the utility company and that has to be properly thought out and the framework needs to be in place to accompany that. We are not quite there yet.

Silbert Mills:

Can they set out guidelines for the circumstances for you to be able to claim for? If there are no guidelines. Sometimes you are wasting your time going to claim for when you lose appliances. So, we need to know whether we are wasting time.

Cambridge (URCA):

Feedback has been received saying that the way BPL deals with complaints is inadequate. The general consensus from those that have expressed comments is that the way it reads it does not give them responsibility for anything. So, basically what they are looking at now is trying to see how to properly word that to say basically that things that are too remote they should not be responsible for, but matters that are within their domain or fall within the domain of negligence they will be able to assign some degree of responsibility.

Mills:

Awfully vague.

Cambridge (URCA):

As it reads now it does not say any of that, but they are trying to find the proper language to show that they are not trying to avoid any kind of blame. To be realistic, things like lightning, third party interaction, even from a negligence perspective, from a purely legal point of view the level of remoteness, a level reasonableness with assigning liability fully to the utility for that, will pass those tests.

Mills:

I am three years from sixty does the CPP speak to a senior citizens consideration in this?

Cambridge (URCA):

That is that vulnerable area that was brought up earlier as well, and if sufficient numbers raise it, it is something that we will be able to take back to the other stakeholders, namely government and BPL and say that there is an interest in this. And, based on that interest, that has to be factored into the tariff-setting mechanism, because you have to... would then have to look at what percentage base of your consumers are over 60. And you have to start setting certain guidelines, as to how many properties of persons over 60 will be able to claim this, (on) because we know how the Bahamas goes. These are the types of things we need to look at.

Mills:

The interest on consumers' deposit-- who benefits from that?

Cambridge (URCA):

I can't say who benefits from it, but I understand that at one point they were paying interest on it but they stopped. Again, that is one of those things that they counteract with-- there is no interest being charged on outstanding bills. Again, that would be something we could throw out there. I am not standing up for the utility, but it has been at other places that the adequacy of that 37-year old deposit and what frequency should they be allowed to visit that deposit. I read it somewhere, that once you are disconnected that initial deposit is forfeit and in order to be reconnected you now have to be assessed a profit at today's rate. So, if you are a good paying customer and you have never had your electricity cut off you might be like that does not concern me. There are a lot of dynamics.

**Appendix D—Transcript of the Town Meeting at St James Community Center, Hope Town
(Abaco) on 27 September 2017**

Earl Bethel:

The one thing is, I have had a lot of damaged equipment. I have been to BPL straight up to the CEO Level and now she is gone so I have to start all over again. But the thing is, here is what we find, here is that sometimes BPL in Nassau does not know what is going on with BPL here in Abaco. There are times when because of my meeting with executives in Nassau I will be telling them things and they don't know what-- that it is happening here in Abaco at the plant. So, what are you all going to put in this document to say that there is correspondence within the organization. Not only that I have telephone numbers for persons who are in management at BPL in Abaco and sometimes they do not know what is going on. And I am glad I have their cell phones because I could say that we just got hit real hard, we've been out for half an hour and they will say that I don't even know that. And they then get to the plant people and they can say that we are down for this. We don't know if what they are telling us is the truth. Sometimes they say that a lamp pole is down in Abaco and we don't even know if that is the truth. There are a lot of things going on internally and BPL is not speaking to their management and then passing it on to Nassau with the truth.

Cambridge (URCA):

I gather what you are telling me is that there may be a need for them to put in place some sort of tracking process with a registration number. You are saying that they are unable to tell you what is going on. There may be a need for them to put in a proper logging system. So, you can call and say this was my complaint number, but it was not addressed. If BPL accepts it, they will have to put in place a proper logging system. So, any manager or executive can go in the database to and check then say that, Mr. Bethel, your complaint is here let me follow up to see who is dealing with it. Also, please send your suggestion to us.

Collie:

I totally support his response. There may be a breakdown internally in the organization as to what is going on in its different parts, and that is a problem. In so far as it affects service to its consumers, it becomes an URCA concern. It is something that needs to be shared at a higher level. Say we need to look at how the organization functions internally. A part of the plan also requires that, when they are outages, they have to advise the public, especially if they know that there is going to be an outage. For example, when there are storms or other natural disasters, we require that they send us reports on a daily basis.

Bethel:

I have two more questions. I am not a techie or electrical person. I run a hotel here. I will call this gentleman right here and he will say that the voltage dips. Rich do you want to explain?

Rich:

Just the other day I was at my desk working 6 o'clock in the morning and we spiked to about 270 volts for 15 minutes which is detrimental to all equipment and, the same thing, they don't know that we are spiking until I call someone in Marsh Harbour and they are like really! They have no clue what is going on. The same with the low voltage situation. We are at 99 voltage at the lodge. We are running generators and they will say that we did not know the voltage was down that level till I report it. So, there is not a lot of feedback from them.

Cambridge (URCA):

That is an operations type issue and from a consumer perspective my thing may be to provide a comment that I feel that there is a need for more quality monitoring at major sub stations or some sort of feedback

Bethel:

Are you putting this in that document?

Cambridge (URCA):

Send that comment in and we will try to figure out how to make it a standard requirement. Once it is highlighted that these are the observations, that it is apparent that there is insufficient monitoring of the voltages. With today's technology there are ways that you can do that that is not too expensive.

Bethel:

It damages your equipment

Cambridge (URCA):

I have a surge protector that discovers the discrepancies in voltages and it does not come back until the voltage is correct.

Bethel:

You got to make sure you supply us with a lot of them. One more thing, I attended a meeting here with BPL. Maybe you should have had a BPL rep here. We tell you one thing and leave it to be interpreted. They had a meeting just before the election and a lot of promises were made. They talked about doing another line from the main line for over here. Are you'll aware of that?

Cambridge (URCA):

Infrastructural developments like that—They are not obligated to tell us at this point in time. As part of the licensing conditions moving forward, they are going to be sharing maintenance plans. Something like that, that will have a major impact on service, will be shared moving forward. The way that that comes into play is a part of tariff setting mechanism (that) allows you to claim as a major utility provider for major improvements. So if you want the support when you request for any tariff increase, you want to be stating to the regulators stuff like that. So that is the incentive to report stuff like that. It is kind of like VAT how they say self-policing. It is self-policing.

Stafford:

I noticed in your draft there that are required to supply a minimum of 13 and a maximum of 20 volts. I monitor voltage on my house on a regular basis and I regularly see that the voltage is on the outside of that window. So, what in this draft is there to protect me as a consumer from lower or higher voltages? I am monitoring and I am monitoring 107 for a week. How am I protected?

Cambridge (URCA):

What this draft will do is allow you to lodge a complaint and I can tell you because I have little bit of a legal background too. I can see the utility provider saying 'how do I verify that'? You say that you bring your data logger and I bring my data logger and we will decide who will be the independent data logger. And that is URCA. We are the independent and we will come with our data logger and we will say 'BPL we are URCA we get our stuff certified.' We verify the gentleman's complain and needs to be compensated for any damages that may have occurred as a result of it and you need to submit the rest of it in a certain time period. What are your actions to remedy this, because it is unacceptable and that's why you need the plan.

Stafford:

So, I need to read that carefully so that I could find the information to file my complaint.

Cambridge (URCA):

It will tell you what the standards are that they are proposing.

Stafford:

This has not been enacted yet.

Cambridge (URCA):

Right.

Once this is finished with the consultation period and it has been accepted. Previously, they were self-regulated.

Stafford:

In the meantime, I have to wait.

Cambridge (URCA):

You can still file a complaint and URCA will follow up on your behalf. This is an attempt to regularize and improve on existing standards.

Stafford:

To be clear I can file a complaint with BPL and also send it to you.

Cambridge (URCA):

Notwithstanding what is in here or the document not being finalized. Under the legislation URCA is empowered to act on your behalf, if you have major complaints.

Audience member:

Do you have a local office or representative? Or does everything go through Nassau?

Cambridge (URCA):

Everything comes through Nassau

Bethel:

I believe that if you all made the compensation package attractive to the consumer to the point where BPL realize that if they don't provide what they promise they will do better.

Cambridge (URCA):

You might be right. You can send that as part of your feedback.

As regulators we don't want to get to the point where we are saying to the utility provider just compensate more. No, no, we don't want you to be in the position where you have to compensate.

Collie (URCA):

We draw on our experiences in the electronics communication sector and what I tell people there is a lengthy wait period of 30 days, which I think internally we are reviewing before consumers in the electronics communications sector can come to URCA; and what I tell them is copy us on your official complaint to the supplier and that sometimes puts a little fire under them to realize that URCA is watching and that has been really effective in getting complaints resolved.

In terms of the bigger picture, you mentioned increasing the compensation package. Remember, as regulators our stakeholders are not just consumers, our stakeholders are the providers, government, of course, and others. And as Shevonn has mentioned, we do not necessarily want to put them out of business but, at the same time, we want to ensure that they are always aware of their obligations to consumers. The thing that we find is that a lot of Bahamians residents they tend not to want to complain officially. They will speak up in a meeting or they will speak up on a talk show but we have been encouraging them because it is complaint base. When you file your complaint, it puts it on record with the supplier. It opens a file, it tells us as regulators that maybe we need to push the regulation that affects this particular issue a little further. Maybe we need to add something to it, maybe we need to enforce a little bit more, so when we review and analyze the complaints it goes up another level. We do another kind of work in analyzing and working with the supplier. Give us a little bit of breathing room to get this document done, send us your feedback and hopefully, at the end of the day, BPL will have a document. We will have a document that we can live with. This living document will be changed as necessary, but one that will protect you the consumer.

Audience member:

Earl kind of said it all. I think everyone on this island kind of agreed with Earl and I think the reason you are not seeing more people in this room today is because we have all given up. People have given up complaining because nothing happens. It is like talking to the wall. I've lived here for 18

years. I have a business and I am a consumer. I have never seen the power get better. Over the years the power has gotten consistently worse, even with the 80 million dollar power plant that was installed in Marsh Harbour. When he says that the power has gotten better recently, he means in the last month because this summer the power was out more than it was on. My neighbours do not have a generator and they are elderly and they have every window and door opened. It is hot and they have no relief for air conditioning. I know that is not a question but you are really walking into a can of worms

Audience member:

I am really not clear how much influence URCA has over BEC, but would it be possible to suggest to them. I know that Water & Sewerage does it--to give senior citizens a discounted rate, if the senior citizen actually owns the house not just living in it. I remember when I turned 60 Water & Sewerage wrote me and told me that I was getting this discount. Why can't BEC do that?

Cambridge (URCA):

Again, that is something that will come up when we get into the tariff setting portion of it. As I said earlier, we were locked out of dealing with tariffs for 5 years. In terms of URCA authority over or within BPL as a licensee, there are certain conditions we can hold them too. We have regulatory power to revoke the license or to fine or in certain instances to see to it that certain things are done. That would not be in this document; that would be in the licensing document.

Collie (URCA):

There is a... This plan also addresses vulnerable consumers. It does seek to bring relief to certain categories of persons.

Audience member:

As a consumer, would it be more beneficial to go to BPL or go to URCA? Or both?

Collie (URCA):

In this particular case, we are trying to come up with a document that will protect the consumer.

**Appendix E—Transcript of the Town Meeting at St Martin’s Anglican Church, Sandy Point, on
28 September 2017**

Audience member:

In your presentation you said certain time limits for certain things, and I stand to be corrected, but I think I only saw where there is only one penalty for extending the time. Can we have more penalties attached to it?

Brown (URCA):

That is a good question. The fact is that because we are newly regulating BPL, they have never been regulated this way before. It will take time to get certain things in place. In other jurisdictions, they have what is called ‘guaranteed standards’. Those standards have a minimum standard. And if the utility company does not meet those standards, there is a penalty in terms of compensation, and sometimes automatic compensation, which means even before you apply they make those compensations. However, at this time we believe that this would be too much of a burden to impose that on BPL. What we are trying to do is do it gradually over time. We start with a baseline. In fact, it is the bare minimum to consumer protection. And we hope, over time, as we get this in place working effectively, we can move on to the other level with guaranteed standards, with automatic compensation once they violate those standards, but that is an excellent question.

Audience member:

I listened to your presentation, and based on the items that were covered, I still think there is a lot more work to be covered in this draft.

Brown (URCA):

Could you identify yourself and you could also put your thoughts in writing then send them to us?

Audience member:

When I called URCA about my specific complaint, Ms Woods was able to say to me for the island of Abaco, this is what it is. And I would like to see the same for this presentation for BPL. All the islands are different challenges and manpower. Some of these things will happen much quicker on different islands, and you cannot put it under one big umbrella.

Brown (URCA):

Internally at URCA we have these discussions and to have a one cap fit all is not the answer; but, sometimes you have to start somewhere until you get there.

Audience member:

At least with the major islands.

Brown (URCA):

That is why we are here. We need these feedbacks. We are all stakeholders. You are a stakeholder. Because, if there is no company, they will not be able to provide the service. You the consumer-- if there is no consumer, or if the consumer can't afford it, then the reverse is true. And we as, the regulator, want to ensure that it is fair for everybody and take all these issues into consideration. Abaco needs to have something that fits their experience.

Audience member:

Furthermore, I did not see any difference between residential and commercial customers. I would like to see the difference between residential and commercial customers. Those of us in business do not want to be without a service for any length of time.

Brown:

We invite you to go through the document and try to be specific. Highlight the specific issue – it will help.

Audience member:

My specific issue is subdivisions. Subdivisions come in several sizes. So you will have to specify that my subdivision has 5 lots; the other person down the road might have 500.

Wood (URCA):

By virtue of the recordings, we are documenting everything that was said here today.

Audience member:

When do you expect the consultation period to end?

Wood (URCA):

At the end of October.

Audience member:

How long will it take to correlate, and will you be doing another presentation.

Wood:

We will be doing a final presentation on the document.

Audience member:

After October you expect to come back to us when?

Brown and Wood (URCA):

Roughly six weeks.

Audience member:

Probably around the first of January, and will it be conducted in forums like this?

Wood (URCA):

If you indicate on the evaluation the format, the strategy you want us to come to you, we will certainly take all of that into consideration and act on it.

Audience member:

I live in Sandy Point, and we don't have any tree trimmings done per se. You noticed the trees over the lines over there. I think there should be something in there about tree trimmings. This is the hurricane season.

Brown (URCA):

You are saying that there should be an additional standard to deal with trimming of trees.

Audience member:

If you ride along Sandy Point, the poles are so near the road this is why when we have accidents the vehicles run off the road into them.

Brown (URCA):

With tree trimming, BPL has to respect private property and sometimes some of these trees grow over and BPL can't just go and cut sometimes without seeking permission. So, what they are saying is that (the) private property owner whose tree is in the line would have to share the cost of tree trimming, and that is not unreasonable. It shows respect for private property. This particular issue is more complex than meets the eye.

Audience member:

I lived in Grand Bahama for many years and the port authority don't come and ask you, they trim the trees they cut whether it is in your yard or not

Brown (URCA):

I agree with that because their responsibility is to ensure their safety. They are the initiators of that process.

Audience member:

Around the poles the bush grows so high and when you have bush fires they burn the pole up. That is another reason why we have outages so often.

Audience member:

With regards to tree trimming going to Cherokee or even the main highway you have a lot of Abaco pine trees growing right under the line. Why doesn't BEC have someone with a chain saw cut these trees while they are small rather than wait till they get up in the line and cause them to hire a big truck. Why don't they just have a regular maintenance period from Crown Haven to Sandy Point? Abaco pine trees they grow high. And why wait till hurricane season come to start cutting down trees?

Another problem is the cutting of power. A lot of times the electricity goes off two or three times per day or more. You wonder if something is going wrong, or the in and up and that could damage people's equipment.

Brown (URCA):

That is why we have here, as one of the standards, equipment damage, and if we should develop a good penalty. When BPL does not trim the trees and the light going out damages people's equipment, and there needs to be a proper standard with proper incentive. And when you make a claim, BPL will have to compensate you. So when they have to compensate you, they will have to find a reason to cut those trees.

Audience member:

When someone builds a house and you want power we have to purchase that meter.

Brown (URCA):

Right, when you make an application, you will have to pay a deposit. I do not have the number they would charge.

Audience member:

So we have to buy the meter.

Brown (URCA):

No, it is BPL's property. They are running a business. So, when you are running a business, there are certain risk mitigations. You try to cover your risk. So, what they are saying is that you make a deposit on the meter. It is their investment. They want to make sure you take care of the meter so that they do not have to replace it on a regular basis. So what they have proposed is that if you are proposing is that if you are a delinquent customer you would have to pay a higher deposit. So, they have this list which is a gradient scale of payment. If you are a good paying customer, you pay less deposit. But if you are customer that is delinquent, from time to time, you pay more. It is a good business practice where they are trying to cover the risk of you doing the same thing again.

Audience member:

So we pay rent on this same meter every month.

Brown (URCA):

It is a customer charge which has to do with the cost of providing the meter.

Audience member:

We pay a deposit on this meter when we move in our house, and we are paying rent every month. So, if we are there for 50 years, that means that I am paying rent for 50 years. When I die, my children will continue to pay rent. That is highway robbery.

I think as senior citizens we should be given a discount on our light bill. I think you all should look into it. We paying rent, rent, rent. Water & Sewerage gives senior citizens a discount.

Brown (URCA):

The legislation and the Act have outlines that special consideration should be paid to the disabled, senior citizens and the most vulnerable.

Like I said before, URCA is not in a position to determine rates – we are a regulator. We at URCA do not have the power at this time to deal with rates.

Audience member:

Can you look into it?

Brown (URCA):

Yes.

Audience member:

When is the transition coming of new management to BPL?

Brown (URCA):

We only know as much as you.

Audience member:

How will it affect this?

Brown (URCA):

We do not know, but this is legislation that they cannot change. How it will affect this process, I do not know. It will probably slow it down to give the new people time to understand it. In terms of changing the legislation – no. the legislation is already in place.

Audience member:

BEC, how come they don't pay consumers interest on their security deposit?

Brown (URCA):

I cannot speak to it definitively at this point, but all I can say is that in other jurisdictions, they do pay. For example, in Jamaica the utility company pay interest on deposits. As I said, we do not have the capacity to address rate issues.

Audience member:

The cost of transporting fuel to BEC is passed on to the consumer.

Brown (URCA):

Yes.

Audience member:

They started off with two bidders. One bid was much lower than the one that got the contract. So we the consumer-- It is coming out of our pocket.

Brown (URCA):

Prior to 2015/2016, there was no electricity legislation in place to regulate the electricity sector. So BPL was its own separate agency. Now legislation is in place thanks to Electricity Act, and the license which will be issued. They are now obliged to procure these fuels and other economic equipment through a competitive bidding process, and it has to be transparent. They have to demonstrate to the public that the process which they apply to procure the fuel is the cheapest. In time, the regulators will have oversight.

Audience member:

Getting back to fuel-- When BEC decided to go with diesel instead of Bunker C, why wasn't a questionnaire put out to all of the consumers to ask whether you want BEC to use Bunker C or diesel? No, a lot of the foreigners wanted diesel – it is cleaner. In Nassau, I live in Nassau most of my life and they've always used Bunker C.

Brown (URCA):

It depends on the type of generation plant they use.

Audience member:

This generating plant that they have now can use Bunker C or diesel. The consumers were not asked. They just let a few people dictate and it cost the consumers more.

Brown (URCA):

There is now regulation put in place to make BEC management more accountable and transparent.

So I could not speak to what they have done in the past. I do not know.

Appendix F—Transcript of the Town Meeting at L.N. Coakley High School, on 23 October 2017

Mr. Bowe:

Why does not BPL use peak load pricing, which has been in Europe and France and other areas all those years, which means at times when electricity usage is high the cost drops and what happens is the household can switch its consumption during the day and do ironing and stuff like that night. The next thing is I use a lot of computers in my house. I get up around 3 or 4 o'clock in the morning to get work done and power goes out. Exuma has a problem with consistency of power. So, what can we do?

Cambridge (URCA):

With the pricing mechanism I can tell you, as the regulator, they are looking at a number of things, but the big one that will impact a lot of things is the integration of renewables. And how you deal with compensation of individuals with power sources on their homes or who may have the opportunity to return power to the grid. There are things that you are talking about the whole aspect of demand side management or time-based task and those and things which you use to shape consumption pattern. Or, if utilized effectively, they can reduce the utility's capacity need, which reduces capital and also affects the tariff but these things come into play once the regulator is involved in the whole tariff-setting mechanism. We will do certain mechanisms to incentivize the utility, as well as the consumer, to act in a certain way. So, the whole time-based rates is one of those things that you use to fashion consumer behaviour and to assist the utility and improve the system.

The other part of the question was...

Mr. Bowe:

The outages that occur.

Cambridge (URCA):

Things like frequent outages are easily verifiable facts. One of the things that we have as a condition of the license for the utility is that they have reporting obligations to the regulator. At present the regulation is that any outage over two hours is considered an URCA reporting type outage, but based on the feedback that we have been getting as we go throughout the islands, I am seeking to have that revised to where a certain amount of outages within a specified time period would also be considered reportable. Just say you have three or four outages within a 24-hour period, and none of them is more than two hours. It is still significantly a nuisance to be considered a problem and that is one of the things that we would like. And, once we get those kinds of feedback, we analyze the data, and we go back to the utility and say this is unacceptable, and you need to do certain things. And, if they don't, it is where we have regulatory action, whether it be fines or we also have step-in rights, where the regulator can step in and take matters into his own hands to do certain things to correct the problem.

Mr. Bowe:

Like what?

Cambridge (URCA):

Once you start to impose fines, it gets people's attention. The other thing is, the regulator, as well as the Minister through the Act, if a licensee is not meeting their obligation, has step-in rights to say that we are going to bring in a provider that can do it or we feel, in the interim, what you need, let's say, it is a generation problem, we say we have individuals out there who are prepared to do PPDs or IPPs or whatever the case may be. It will seek to license them to meet that obligation. The key thing is with rate setting. Rate setting governs a lot of it. It is that, through a rate setting, you can incentivize a utility to do a lot of things. The utility may say the reason we don't do a lot of things is because we do not have the funds to do it. Then you will say that we will assess the situation, and this is the amount of funds you need to do it, or bring us your capital plan. We will review it, and once it meets our satisfaction, we will set the rates up to facilitate you being able to do it. And then, we will closely monitor the process to ensure that you are doing it outside of just reporting obligations. There is monthly reporting with regard to operations and performance data that we are constantly reviewing and trying to identify to advise the utility accordingly.

Mr. Bowe:

This is not to cast aspersions on anyone, but I think you'll need to inspect the generator side to see if the generators are working. It seems as though, with BPL, they lack systems. You need to make sure these generators are working.

Cambridge (URCA):

I would like to tackle that within the sense of the consumer protection plan. Perhaps there maybe needs to be some standards in there with regard to the availability and reliability of generation. For a particular locale we may say that we want 80%. First, you need to assess where they are at in terms of availability and reliability and these are standard industry KPIs and performance indicators for generation. Or, we may say we want to have certain quality levels in the standard, and if they drop below that maybe there may need to be compensation. It is for you to put forward, and for you to go out there and see what other utilities are doing, and to see how fair it is given whatever resources and stuff they have available for them today.

Thompson:

There is a lot of talk about major developments. How do we determine if we have the generation capacity to handle major developments?

Cambridge (URCA):

In terms of capacity, what I can tell you is that I know that BPL has said that they are now revising their most recent business plan. And I can tell you that things are very dynamic in this industry right now. So, considerations that they had in 2013, when they did the last plan, things have changed tremendously. But, one of the things I would like to point out to you is that the Electricity Act speaks to the fact that any new capacity that BPL gets, that they are to give first preference to renewables. So, one of the things that we at URCA will be doing is that any new capacity plan that they provide, they will have to demonstrate to us (not that they have to do renewables), but

they have to demonstrate to us that they considered it and why they are not looking at it. I know that they are looking at all of their territories with regards to that plan. Some of the things that they are looking at is standardization, and what have you, to try to make their operations more cost effective and efficient. To put it in a more nutshell way, I think they are looking at a more plug and play throughout the island where there will be standard. For example, if you have a problem in Exuma, you can pull that plug, and replace it with another set where it goes back to some central maintenance area, where the maintenance can be done more quickly and efficiently, which will allow them to leverage the whole aspect of transmitting.

Thompson:

Are we going to be made aware of this before it happens?

Cambridge (URCA):

One of the things which we are doing is public consultation, and if it is not through consultation, it is published on our website for all stakeholders and ads in the newspaper to show you where you can go to comment on it.

Thompson:

We have to live a certain amount of blackouts. Is there a way to minimize the amount of blackouts?

Cambridge (URCA):

What I am hearing is that you are not only calling for more information. What URCA does is an annual plan, and that is how we keep the public abreast of what we are doing. What I am hearing from you is that you want some sort of reporting from your local providers, but in my opinion it is not something that they are required to do by any of the statutes of their license right now. Just from being a responsible corporate citizen, maybe through the local Chamber you want to call them to report once a year or quarterly to monitor their performance. I don't think it is an unreasonable request.

Appendix G—Transcript of the Town Meeting in South Eleuthera on 1 November 2017

Audience member:

Is this the first time that a plan like this is being offered by BPL/BEC? Or was something in place before?

Cambridge (URCA):

This is the first time that the Consumer Protection Plan is being offered. What they might have had in the past is mere guidelines on the application process, but they never proposed what we call 'quality standards'. There is an overall standard and then there is a general standard that is more personal to the consumer, like my reconnection will be done in a certain time.

Audience member:

It is not clear what their plans are for solar.

Cambridge (URCA) :

What we have is a small scale renewable generation programme that is up and fully operable at this time. At the level that the individuals are allowed to apply for vary per location, but what I do know is that, for the most part for the residential customer, based on your average customer demand plus 5 KW is how they allow you to apply for the system up to 100 KW. So you can have a system up to 100 KW but your average consumer demand plus 5KW. For residential consumers what means is that they are allowing you to tie into the system so that on average you will push back 5 KW back to the grid. For the commercial customers, they are allowing average consumer demand plus 50 KW, so you are allowed to sell back 50 KW back to the grid. That's the New Providence numbers. I think the numbers are based basically on the demand on the system, because if you allow too much renewables... Renewables have a variability component or a volatility associated with the fact that wind drops off or clouds come over. It goes up and down. So, you don't want to create too much variability or instability on the system to depending on your system demand. What they are trying to do is give the initial size allotment in each area to be about 5% of what the maximum demand in that area is. But, we now know from experience throughout and in the region. We do a lot of research in URCA that we know that our Caribbean counterparts are seeing up to 30% renewable integration into their system without having any major impact on grid stability. The component that you sell back to the grid, the compensation that is currently in place for that, is that we are allowing compensation for that, is that we are allowing the fuel charge for that period, when that surplus is fed back into the grid. So, basically, you will be compensated at the fuel charge rate, not the tariff plus the fuel charge. The process is that you go through an application process where you are vetted by a small scale, by BPL, Once you satisfy them that your system meets all their standards, you then enter into an interconnection agreement with them. What they will do is come out and give you a meter that is programmed to read both ways. You will be able to take and give back. What we are finding out is that there is a lot of rogue operators that are connecting on to the system without going through the proper channel. And what they are finding is that when they put their solar system in, their

bill is going up and that is because the meter has not been programmed to go both ways. And so, whether they are injecting or receiving the meter is adding it all. So, if you are interested in it, there is the application form for the residential consumer, on BPL's website, and if you are interested in it at the commercial level, the application form is on URCA's website.

Island Pole, they have been operating for a number of years, based on a formal agreement they had with the Ministry of The Environment, who was kind of overseeing the process at that time. But, they have made the necessary steps to have their matter regularized, and they think they are now enjoying the full benefits of the new programme.

Audience member:

In reference to the cost of fuel—Is it cheaper based on the number of consumers?

Cambridge (URCA):

What you have throughout the Bahamas is a unified tariff. We all pay the same rate, regardless of which island you are in. But, inevitably what that means is some islands that are subsidizing others and, for the most part, what it is that New Providence is subsidizing the rest of the Bahamas. From my time period in BPL, what is recalled is that there were only one or two islands that were in the black. Everything else was in the red, so that goes back to that profile which I was telling you about that most of the revenue comes from large systems. You will find that the islands with the large anchor projects like San Salvador with Club Med; Bimini with Resorts World, they are able to carry their fair share. The issue is two things 1) the system operational dynamics—the way generation tends to operate—is that it would be good if you could load them up to 80 or 90 percent, and let them run when you have cycled them and all the rest of that. They go down and they come back up, and so there is a lot of things involved in trying to get them to the optimal. But another thing that works is that with Family Island systems, you have these long spans. This island has two stations one north and one south. Most of the islands have one station in the middle; so they are generating 70 miles. So, there are losses associated with going over those long spans. Most of the islands are running on a more expensive BDO. New Providence has at least the option of a cheaper for a greater portion of it. These are the things that the integration of renewables will introduce, and as the regulator, we are now looking at things like when they are going to install a new plant, alternative fuel options—that is from a cost and an energy perspective.

Appendix H—Transcript of the Town Meeting at Rotary Club of Eleuthera, Cancer Society Building, on 2 November 2017

Audience member:

Can you give me an example of when you had to refuse or use right of refusal?

Cambridge (URCA):

Let us bear in mind that this BPL's plan. This is not URCA's plan. An example would be if you had a customer that was doing something sensitive to the equipment; so, they want to supply within voltage and frequency deviation that is a bit onerous something that would come at great expense to the utility company; or, if you had a house that was far out or remote or far away from the established network and it required building for a pole, a significant distribution of assets to reach you which deplete the utilities exposure in terms of losses and capital contribution and all the rest of that. In a case like that it may be more advantageous for them to say 'we will give you your own generation license and you can provide your own power', because basically what we have throughout BPL's territory is a unified tariff and so any expenses are basically shared across all consumers. So, you don't want to have one consumer with special needs or their own little data thing, because it is driving up the cost for the majority. So, you do what is in the best interest of the greater good so to speak. And I think people would have seen it to a smaller extent when you build in an area, and BPL tells you that you have to make capital contributions and you will get certain amounts back if individuals move nearby. From the regulatory perspective, you are trying to provide the services to as many as you can and with as a high quality as you can, and you are also trying to make it as affordable as you can. So, you are balancing a lot of things in the midst, and that is just the obvious one. There are other little things under the surface that you have to (consider).

Audience member:

I don't think it is fair that they can refuse to provide power

Cambridge (URCA):

Let's say you had a little cay 2 or 3 miles off Eleuthera.

Audience member:

When you are talking about a cay that is different.

Cambridge (URCA):

Just say you were located in a very remote area of Eleuthera that was undeveloped, and you needed power. Well, there are two things they could price it for you at cost, which most people tend to say that is not fair. I am from The Bahamas I should get it like everybody else. Then you have to consider the capital cost of getting that power to you and you alone really is not fair to 180,000 consumers.

Audience member:

What happens when other persons come to the neighbourhood?

Cambridge (URCA):

The way I understand it to be now with the capital contribution process is that if other persons come into that area within a certain period of time, which is calculated based on the value of the assets and the lifespan of the assets it takes to provide you with electricity, you would be reimbursed whatever your contribution should have been.

Audience member:

What if something happens to your equipment?

Cambridge (URCA):

If you have something happen to your equipment and you actually have documentary evidence as to what the frequency deviations are, they would consider the breaches, and you would be able to enforce your regulation based on common law negligence stuff or based on what is in the plan here.

Audience member:

Power went off, then on, then off then on and after that the equipment was busted, how else do you recover?

Cambridge (URCA):

I tell people all the time when I get these types of questions—document, document. When your light goes off, you document, when it turns on you document and you can document how many times it went off. The utility has a reporting obligation to URCA as part of the license and one has to do with major outages. So anything for a certain duration, they have to report, and based on some recent feedback that we have been receiving, we are actually looking at imposing on them a reporting obligation with regards to multiple outages within a certain period of time.

Audience member:

A scheduled power outage for Governor's Harbour between 9 am and 1 pm and they tried to put to put power back on literally about 5 times and after that my ACD unit, which my computer is connected to that, got busted, the actual surge protector-- the battery part of it.

Cambridge (URCA):

Did you report it to the utility?

Audience member:

Not yet, I recorded it

Cambridge (URCA):

The thing with that is you need to get that recorded as soon as possible, because there is probably someone else out there who had equipment damage and the utility is going to say you are the only customer out there who had appliance or equipment damage. In terms of affecting issues or incidences because you are a part of a common network, and if there is an issue and multiple consumers tend to see that issue; but if multiple consumers remain quiet, then the lone wolf out there appears to be a person who has a problem that is specific to their location. The sooner the utility could get those in, the sooner it could evaluate or assess the situation, and see exactly how many consumers may be affected and their degree of culpability or their liability.

Audience member:

What we know as a power surge, does that come from voltage deviation?

Cambridge (URCA):

There are power surges in this section right here—transient voltage, just in the natural operation of a system. As you are disconnecting load and putting load on, you will see some transient voltages, but the utility is supposed to have protection equipment that would maintain or curtail anything that goes to levels that is dangerous to isolate. You will see as generators are on loaded or off loaded or circuits are energized or deenergized, you will see little variations and that is allowed in the industry, just as part an inherent part of the process.

Audience member:

Can the voltage deviation in some instances lead to fire?

Cambridge (URCA):

During the normal course of action it should not. If you have fire, fire is normally due to poor connections and sparks and stuff like that or really, really extreme voltages. With normal operation systems it should not.

Audience member:

If it has been deemed as a result of voltage deviation and it is reported. Should it be reported only to BPL, or should URCA be copied in on the correspondence?

Cambridge (URCA):

You are well within your rights to copy URCA in on it, but when you start talking about voltage deviations in general or damaged equipment because we get to consumer complaint section and dispute resolution process—that speaks to how the first line of the submission should be at the utility consumer desk and then they have some information in there on how to calculate (convey) that up to management and the executive management. URCA likes to think that you have exhausted all of your efforts with the utility. We understand too that sometimes that the frustration level causes you not to proceed or disinsensitize people to pursue their claims. Or, you can copy URCA in from the very beginning, so that we will know that the process has started. What I tell people is that anything that happens, (gather) as much documentation as possible.

Someone mentioned fire—If you could get the police fire branch to give you a report, the more information you have to support your claim the better. Think of it as if you are building a case.

Audience member:

One thing that I've found out when you go to complain about the appliances that have gotten damaged, this is BPL's response. They always want to make you feel as though it is your equipment that went wrong, and it has nothing to do with BEC, and then they argue with you and almost want to make you feel as though this ain't worth it. They will turn you around and around and around and you will write and check with every desk, and go to everybody, and most times the earliest you hear from them in six months.

Cambridge (URCA):

I think in here they speak to that. In this report they said that they will get back to you within at least 21 days.

Audience member:

I am happy that we are on this like Mrs. Burrows said. It seems like they are hoping that you get stressed out to the point where you don't push it. Recently, we traveled and came home and met a busted air condition unit. We did not know when the power went off. We don't know what happened, but we knew that we left a perfectly good working air condition unit in the house. It is the summer and you are not going to be waiting for someone to come by after 3 or 5 days. You need to get your unit replaced, and then they are asking you to give them an idea of how much you paid for it and all of that. Who keeps receipts like that? It is almost as if the consumer really has no advocate and you are like the lone wolf stressed out and can't get an answer to replace your stuff, and I really don't think the Bahamian consumer is protected.

Cambridge (URCA):

I just want to add that at URCA we have a help desk, and so the consumer does have an advocate. We have a few staff members that man a hotline and you can call in, but again they are going to ask you the same questions. Which period where you absent? When was the unit last found to be working? How old is the unit? What type of unit? You can go online to find out what the new prices are. And you will do some discounting based on age. Even in terms of the normal process of resolving a complaint you will not get a 100% reimbursement.

Audience member:

I would like to know who pays for people to come in and assess your equipment when it has been damaged. I had an incident Sunday morning here in Palmetto Point, where the electricity went off three times and my stove has an electric pilot. One of the pilot(s) came on and it just kept ticking, ticking and I could see a little flame coming from it and of course I was ready to run out of my house but I had to call an electrician who had to disconnect something under there. Sunday morning—because the pilot keep flickering that was after the electricity went off three times, I did not report it. We had to pay an electrician.

Cambridge (URCA):

This is the main thing that needs to happen.

Audience member:

He said that we need to buy a part now for that to be replaced.

Cambridge (URCA):

Most people do not report incidents; that is why the utility will get away with it. No matter how small it is, and maybe part of what needs to happen is the process for lodging a complaint needs to be made more user friendly. Most modern utilities are providing things like apps and stuff where you could just pick up your phone and send in your complaint maybe that is where we need to go.

Audience member:

I know many years ago BEC always had posted in different sub stations a notice, where they encourage you to have all electrical equipment plugged into a surge protector. I have known of persons who would have gone out and purchased surge protectors and when you had the differences in voltage deviations, they still lost their equipment. And so, when they would have gone into BEC, they were told that they purchased the incorrect (unit), or it was not in fact a surge protector. So, if that is still the position with BPL, is it mandatory that you buy it from them, or they have some literature that says to you where you should go to get this, because everyone is not savvy and does not know, or they may very well purchase something that they think is a surge protector and it is not. Or, (it) is that just a general cop out, so as not to pay persons who would have been aggrieved.

Cambridge (URCA):

I can't speak to whether it is a cop out or not. I know that not everything that is out, that people sell, that may look like a surge protector might not necessarily be the proper thing. I know that in New Providence they had a display in their office for what they regard to be the proper type surge protectors. We are going to be sharing the transcripts of our town halls with them. Maybe they can implement it as part of their consumer education. I am not sure that auxiliaries like surge protectors should fall under their responsibility, within their consumer protection plan, but what should be in their consumer protection plan is to provide you with the quality of service, whereby you minimize your need for that surge protector.

Audience member:

As a consumer, do I need to purchase a surge protector for each of my outlets in order to be able to lodge a complaint with BPL, if something went wrong? Is that the case?

Cambridge (URCA):

As a consumer, and as a consumer myself, you have to appreciate that not all instances of voltage deviation have to be BPL's fault. There are lightning strikes and things like that or acts of God. There are third party damages, where individuals may run into a pole, and cause the line to snap.

As a consumer, you would want to have your own safety measures in place, or try to mitigate against damages that might not be BPL's fault. So, insurance and things like surge protectors are in that mechanism.

Audience member:

BPL can't use as an excuse for not compensating you that you did not have a surge protector.

Cambridge (URCA):

Not for an issue that was not BPL's fault, that will not stand up in a court of law.

Audience member:

Let's say you have a generator at your house, and obviously when the power goes off and comes on, you lucky if you live in an area where the power does not go off regular. You have a 100- gallon diesel tank. When you come home, you run the generator for two hours. While the generator is running, the wife wash and dry, cook on an electric stove. The problem with BPL-- Is this allowed or is this illegal?

Cambridge (URCA):

That is against the law. The standby generator exemption is only valid when the provider is unable to. It is only valid for emergency or standby situations, and also limited to 1,000 KW. This is in the Electricity Act section 50.

Audience member:

Is it different than if you have solar equipment?

Cambridge (URCA):

Solar is different because we have regulations in place to deal with small scale solar and you will find information pertaining to that on URCA's website, as well as BPL's website. Generators are only allowed for standby or emergency situations. You cannot run your generator when the power supply is on, as it violates the electricity act as well.

Audience member:

I've been trying to log on to BPL, where you could access your account to pay for the light, but no one could seem to tell me how to log on.

Cambridge (URCA):

I had that same problem. It is a bunch of zeros that you have to put in. It should not be that difficult. I will give you a number to call Peter Rutherford. He is the AGM of Consumer Services, and he is the person I called who walked me through the process.

Audience member:

BPL—There is a lot of dead persons still in their list of consumers, and I know at one point they were trying to get persons to come in to pay security deposits. I guess the challenge was for everybody having to come up with \$200 or \$300, just to get your name change(d) and bring those

documents in. Couldn't they have an amnesty period, where you do the name change without having to pay that security.

Cambridge (URCA):

I can't speak to that part, because that will be the individual consumer contract with the utility, but once you keep your bill current but if they become disconnected that is where the issue lies. How do you collect from a dead person? What I do is encourage individuals to be proactive, and when the consumer dies, go down to BPL with the death certificate and with your document, especially if the account is current. Then there is more opportunity to have it transferred in your name with your documents in hand. The utility would be happy for that.

Audience member:

Do they have the right, say my father passed away, to transfer it on my bill.

Cambridge (URCA):

Not transfer it to a separate location on your bill.

Audience member:

It is not my bill.

Cambridge (URCA):

If you allow them to.

**Appendix I—Transcript of the Town Meeting at St John’s Anglican Church Parish Hall on 3
November 2017**

Audience member:

I turned 74 years old yesterday. I live in Harbour Island. I have a light bill from January 18 and I have been robbed. What I pay right now \$1,200 and my light is off I couldn’t pay ‘em. Why I couldn’t pay em—all my children them ain’t working, and they ain’t gat no money to help me to turn it back on. I go down to the BEC office to ask her why the bill so high. This has been going on for so long I feel like I get robbed at gunpoint, and there is no one to talk to.

Cambridge (URCA):

I know that we have some BPL representatives in the house and they’ve heard you. If you are not satisfied at the end of the process, you can also feel free to contact us at URCA. Our Consumer Relations Officer will give you our card.

Mrs. Barry:

I am Catherine Barry and I pay rent where I live. I move there in April I paid off all the bills I met there, which was \$359. I paid June, July; I left a balance of \$20. I got my bill the second week of October for \$689. This almost sent me up to Sandilands. Only me one in the apartment. I have a fridge, a stove, a small window air condition and a microwave. I don’t pull the fridge plug out. If I don’t need them I don’t plug them, so where this bill is coming from. Something is wrong. They believe Briland people rich, but darling I so poor, and then they does turn ya light off. We need help, and we need help badly in Harbour Island. Dey robbin’ us blind. \$1,000 for one-bedroom apartment that’s bad. Poor people can’t live like that. You gat to do something. Don’t go to the office cause you will get no satisfaction.

Cambridge (URCA):

One of things that I am hearing from both of you is that there may be a need to put something in the Consumer Protection Plan with regards to doing consumer efficiency audit or that type of thing. We will take that as a point to take up with BPL.

Audience member:

When the light goes off and off, it comes on with so much voltage, or high speed. When you look, your fan don’t work no more; your air condition don’t work no more. You can’t complain to them, because they don’t buy you nothing back. They don’t give you no compensation—none whatsoever, and that is very bad. They are taking advantage of us, and these things. They get rich, and we get poor

Cambridge (URCA):

One of the things that I would encourage consumers to do is that whenever there is any disruption in service—and I’ve seen people do it and it is quite effective—keep a log of the time the light goes off and on.

Audience member:

The winter season is upon us. Walking up and down through the island, there are thirteen street lights that are off. I am talking about the safety of our guests. Who is responsible for tree trimming? That is murder, man. They just go there and slash. These are very important for the island. As you go through the island, a lot of tourist are very afraid, especially on the bay front area. The government needs to look into that, because a lot of tourists are afraid to ride gulf carts at night.

Cambridge (URCA):

Street lighting and the cutting of trees— they are very similar, and they are dealt with in their complaint section, and they provided a time period in which they will address any outages from the time they are reported. I know in some of the larger islands, they do street patrols, but some of the smaller, more remote locations, it really depends on the feedback from the consumer. Tree trimming—again as the regulator and trying to address all stakeholders. Trees that are on an individual property, that tends to interfere with the lines, is really the responsibility of the property owner. Now, what the utility will do is they will come out and cut them for you, especially if they are in the line, because it is too dangerous to allow the property owner to go into the lines to try to clear them out. I am a previous BPL employee, and cutting trees on private property has caused many manner of pain. BEC has been sued on a number of occasions just for taking that initiative to cut those trees. Those that are on vacant land or public property the utility has a right to cut the tree before it interferes with the line. They have in this document a set fee they will charge for the cutting and clearing of trees. For most of us who want the system to be reliable I would encourage people to address the issue of tree issues on their property.

Audience member:

I want to piggy back on the person who is responsible for moving away the debris. It sit there for weeks.

Cambridge (URCA):

Well, in this document, it speak to the point that there is a charge for carting away debris from private property, and that is only fair. You can't expect for the utility company to clean your property. You can move it yourself, or they will charge you. The cutting of trees during hurricane season is more of a preventative perspective. If they are there when the wind starts to blow they can fall across lines and cause damage.

Audience member:

I am the Director of Engineering at the Cove Eleuthera. I have similar problems to you, in that we have power outages, and when the power comes back on there is a surge. Our generating costs is \$30,000—frequency use over current use—and what I would do is 1) relate to you all—, particularly you, sir, because of your seniority. This is not addressing the problem; it is helping yourself. If you damage your equipment, no one is going to come and replace it. So, my advice to you 1) is wherever I go in The Bahamas, I see these incandescent light bulbs. Eighty percent (80%)

of the energy in that light bulbs is consumed by heat. The last thing you need in The Bahamas is heat. Only 20% of it goes to generating light. If you change these old fashion light bulbs-- I am from Canada, and let me tell you, in Canada, you cannot buy these light bulbs. They have been outlawed. This... Perhaps that message has not gotten here. You go with an EAR R-20 light bulb. It is an energy efficient light bulb, and when you screw it in, you have almost the identical light. It does not get hot; all the energy goes into the light. You will save 20% off your bill right off the bat. These light bulbs are a little more expensive, for one of these light bulbs you will get 1,000 hours which is about 6 months use. With the new light bulbs, they are more expensive, but they will last up to 50,000 more hours. Also, when the electricity comes back on, there is always a surge and that could lead to multiple problems. My first recommendation is get with the programme, and do something for yourselves. Invest a little money, and over time you will save energy and you won't have these frequent damages. It is called a compact fluorescent light. It is a little more expensive, because it is modern technology. I know about air conditions, and the worst thing for an air condition is to try and run when there is low voltage. The best thing that you can do is as soon as you have a power outage turn your circuit breaker. Leave the light bulb on so when the power comes on you can see the fluctuation, then turn your air condition back on. These are just due diligence things you can do to save you money. It is not doing anything for the power corporation; it is doing something for you. I think we are one of the largest consumers of electricity in The Bahamas. I am in the same situation as you—frequent outages, power surges, and I will have to spend a lot of money on my resort.

Cambridge (URCA):

To add to his comments--The only one I have to tell you is that in my years in the business, I found that one of the greatest consumer of electricity is that water pump. A lot of people tend to have the electric water pump, and they don't realize that the toilet is leaking and the pump keeps kicking in, and that just keeps that meter going like that. So, that is one of the first things that I ask people when they complain about their bill being high. I ask, do you have a water pump and when last did you check those black flaps in the toilet. Even if you don't have a water pump you need to check your water bill, because the rubber actually crystalize after about 5 years

Audience member:

He mentioned the flap on the toilet tank. You ladies are probably the biggest culprits you ladies like to have bleach. Soon as you pour bleach on the rubber, it expands. It is no longer flat, which causes leaks. You don't even know that, and it just keeps running and running and running, and that water pump is continually running. If you cannot stop using bleach then see if you could invest in a different flap that is more durable.

Audience member:

I did not know that BPL actually did an estimate reading on your meter. I just found that out when I went to check on my utility bill. I was told that I owe a past due amount of \$771. So I asked the question how come. I was paying the light bill of \$134 and did not leave a balance so how come so I was told that the hand (device) that they use to read your meter with was not working for

months, so they actually estimated my bill for 5 months, even though they were sending me bills, and I was paying my bill. And I just found out that I owe a past due amount of \$771, since they just came in and read the meter.

Cambridge (URCA):

I hear what you are saying. This is my personal view, not URCA's view. If your meter was estimated for a certain period of time, and it accumulated to an amount that is not really compatible or convenient for you to pay. What I would do is go to the utility and tell them that I need that same period of time to address the amount that is outstanding if you can estimate. I should be able to budget pay you. So, that is something that you may wish to send as an official comment, and then it could be considered by your regulators for inclusion in the Consumer Protection Plan.

Audience member:

Also, if the hand was not working why didn't they drive in the yard like they used to do and read the meter.

Cambridge (URCA):

I can't speak to why they did not do it, but (in) this document they are committed to not going beyond three estimates. So, according to this document, if this was in place at this time, there would be a breach of this agreement, and they would have to work with you. And that being said, because this document is now in the consultation phase, I would take this document and go to them and say that you all are outside of what is in your proposed Consumer Protection Plan. Since you have decided that you want to estimate my billings, I am asking you now to budget pay you. What they call 'budget billing' is when your usage over a period of time is averaged out, and then you just pay monthly on that. So, it is estimated and if they underestimate, it is really not your fault. And they can look at your file to see if you have been current, so you are not a problematic customer or someone who is trying to duck paying their bills. But also, what you can do is go outside, and look at your meter and tell people we are now in the information technology era. Take a picture of the reading, go down to the office, if it is out of whack with what is on your bill. So, in any given month, when your bill is estimated, you go with a picture of your bill. The picture will have the meter serial number and everything on it. So right there at the consumer desk, they will adjust your reading to what is on that picture.