



March 8, 2012

**VIA ELECTRONIC MAIL**

Ms. Alanna Gillis  
Acting Secretary  
British Columbia Utilities Commission  
6th Floor, 900 Howe Street  
Vancouver, BC V6Z 2N3

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Dear Ms. Gillis:

Re: British Columbia Hydro and Power Authority (BC Hydro)  
Project No. 3698640/Order G-132-11  
CPCN Application  
Dawson Creek/Chetwynd Area Transmission (DCAT) Project

We act as counsel to the Canadian Association of Petroleum producers (CAPP) in connection with this matter. The purpose of this letter, having particular regard to the current circumstances of the captioned DCAT application, is to seek leave of the Commission Panel for late intervener status in the proceeding.

As the Commission may be aware, CAPP represents companies, large and small, that explore for, develop and produce natural gas and crude oil throughout Canada. CAPP's member companies produce more than 90 per cent of Canada's natural gas and crude oil, and are an important part of a national industry with revenues of about \$100 billion-a-year.

CAPP's mission is to enhance the economic sustainability of the Canadian upstream petroleum industry in a safe and environmentally and socially responsible manner, through constructive engagement and communication with governments, the public and stakeholders in the communities in which we operate.

Members of CAPP are very active in Northeast British Columbia, including in the Montney area that would be served by the DCAT Project. Increasing natural gas development in Northeast BC also requires increased electric power. Any issues that touch on the policy for provision of service by BC Hydro is of significant interest to CAPP members. While individual CAPP members may intervene in this proceeding in relation to their own interests, issues touching on electricity policy and the role of BC Hydro in meeting the needs of this vital and growing sector of the BC economy are of broader interest to CAPP and its members.

CAPP has noted with interest the various events and procedural steps in the latter part of 2011, culminating with the request by BC Hydro, granted by the Commission on November 30, 2011, to

temporarily suspend the DCAT Project review process.<sup>1</sup> In particular, CAPP has taken note of the various important, if not fundamental, issues that have arisen by way of the 3<sup>rd</sup> round of information requests established by that order, and summarized by BC Hydro in its request for temporary suspension. In this context, CAPP has a legitimate interest in the DCAT application.

While CAPP understands that the Regulatory Timetable in Order G-184-11 has also been temporarily suspended, it does not by this request seek any particular dispensation regarding that process, but would take the record of the proceeding as it currently stands. By that, CAPP would intend to abide by the obligations imposed on, and privileges available to, interveners under any revised timetable, including participation in an oral hearing should one be established, as and when the process for the DCAT application is resumed.

On this basis, and in light of the suspension of the Commission's process, we would submit that granting CAPP late intervener status will not prejudice any other party, and would note that the Commission has granted similar late intervener status to at least one other party since the proceeding was suspended.<sup>2</sup>

Please feel free to contact the writer should you have any questions regarding this request.

Yours very truly,

**GOWLING LAFLEUR HENDERSON LLP**

<ORIGINAL SIGNED BY>

James H. Smellie

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<sup>1</sup> Exhibit B-19 and A-23, respectively.

<sup>2</sup> Exhibit A-24