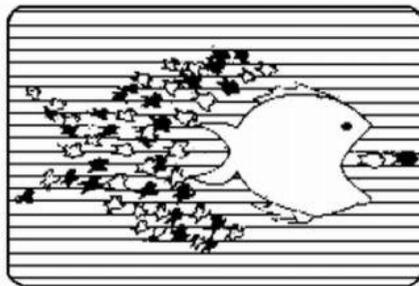


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May 3, 2012

BRITISH COLUMBIA UTILITIES COMMISSION
GENERIC COST OF CAPITAL PROCEEDING EXHIBIT C5-3

Our File: 7501

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

Dear Ms. Gillis:

**Re: British Columbia Utilities Commission
Project No. 3698660 / Commission Order G-20-12
Generic Cost of Capital Proceeding**

BCOAPO et al. provide the following brief submissions regarding the "Preliminary Minimum Filing Requirements for Affected Utilities" attached as Appendix B to Order G-50-12 dated April 19, 2012.

We have reviewed the Commission's comprehensive list of minimum filing requirements and suggest the following additions to the Preliminary Minimum Filing Requirements:

Part A of Appendix B:

Company Related Documents Item 8(b), dealing with deferral/reserve accounts, add:

c. Identify any deferral/reserve accounts that have been approved and implemented since 2008 and the year those accounts were introduced.

Items 2, 3, 4, and 6

The filing requirements in the items identified ask for information and documentation since 2008. However, given the shock to financial markets experienced in 2008-2009 and the relative "return to normal" currently being experienced, BCOAPO submits that it would be useful if the utilities provided documentation going back to 2006. This will allow the Commission to see how things changed starting in 2008/2009 and where they are now relative to that.

Additional Item

11. Provide any research, analysis or memoranda that have been generated relating to this or previous GCOC or RRA proceedings that may have a bearing on the Commission's decision with respect to the issues identified in the Final Scoping Document.

Part B of Appendix B

ROE Matters, Item 1, add:

1.b Provide the rationale for your proposed benchmark ROE and, in particular, identify, with reference to Item 2, the risks assumed to be addressed /implicit in the benchmark utility ROE.

Capital Structure Matters, Item 1, add

1.b Provide the rationale for your proposed capital structure for a benchmark low-risk utility.

ROE Matters, Items 2.a.iv, 8, 9, 10, 11, 12, and 13

Capital Structure Matters, Items 4 and 5

And to the extent extra-jurisdictional comparables are used in providing responses to other items

The items identified above ask for information on extra-jurisdictional utilities or on the ROE generally available in financial markets. Affected Utilities may also use data from extra-jurisdictional utilities and/or non-utility companies in formulating their responses to other items. In all cases where information is either provided directly or is used in providing a response, and that information relates to utilities regulated by bodies other than the BCUC or to companies (utilities or otherwise) operating in jurisdictions other than BC, provide commentary on the impact differences in accounting policy and/or regulatory policy may have on the comparability of financial indicators and market returns derived from reported results.

Sincerely,

BC PUBLIC INTEREST ADVOCACY CENTRE

Original in file signed by:

Leigha Worth
Executive Director
Barrister & Solicitor

Tannis Braithwaite
Barrister & Solicitor