

# ALLEVATO QUAIL & WORTH

BARRISTERS AND SOLICITORS

Allevato & Quail Law Corporation  
Leigha L. Worth Law Corporation

June 8, 2016

Our File: 16-041  
Leigha Worth  
Direct: 604-424-8634  
[lworth@aqwlaw.ca](mailto:lworth@aqwlaw.ca)

via BCUC.com

British Columbia Utilities Commission  
Sixth Floor, 900 Howe Street, Box 250  
Vancouver, BC V6Z 2N3

**Attention: Ms. Erica Hamilton, Commission Secretary**

Dear Sirs/Mesdames:

**RE: British Columbia Hydro and Power Authority (BC Hydro)  
Review of the Regulatory Oversight of Capital Expenditures and Projects  
British Columbia Utilities Commission Action on Complaint**

Please be advised that we make the following submissions on the Purpose, Scope, and Timing of the above noted process in response to Commission Order G-63-16 on behalf of our client, the Movement of United Professionals (MoveUP), otherwise known as COPE 378, now registered in this process as an intervener.

### **Purpose of this Proceeding**

We have reviewed the Commission's statement about the purpose of this process and our client submits that it correctly encapsulates the purpose of this forward-looking inquiry.

### **Timing of this Proceeding**

BC Hydro has expressed its concerns regarding the regulatory burden running this process concurrently with the SAP Inquiry already underway would pose, both in communications with the undersigned and in its submission filed with the Commission earlier today.

MoveUP too supports a timing model that would have this process run subsequent to the SAP Platform Inquiry simply out of a practical desire to manage the already demanding regulatory workload in the coming months. In addition to the large and complex processes cited by BC Hydro, MoveUP will also be preparing for the ICBC Revenue Requirement, and the Fortis Electric and Gas Annual Reviews, and participating in the FEI Code of Conduct

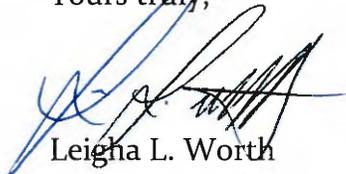
and Transfer Pricing Policy process. With BC Hydro, MoveUP and potentially other interveners facing these logistical challenges in the near future and the importance of this subject matter, MoveUP respectfully asks the Commission to set the timing of this process to begin at the end or near the end of the SAP Platform Expenditure Inquiry.

### Scope

We have reviewed the proposed scope of this process and it is, in our view, appropriate to the purpose of this process and entirely in keeping with the concerns raised by Mr. Adrian Dix in his December 10, 2015 Complaint to the BCUC regarding BC Hydro's SAP Platform conversion expenditures that triggered this forward-looking inquiry.

MoveUP is prepared to attend a Procedural Conference, whenever that might be scheduled, to make further submissions on such subjects as the Commission may request. If you have any questions or issues regarding MoveUP's position, please do not hesitate to contact the undersigned.

Yours truly,



Leigha L. Worth  
Barrister & Solicitor