



VIA EMAIL

roger.bryenton@earthlink.net

October 25, 2016

**BC HYDRO F2017–F2019
REVENUE REQUIREMENTS EXHIBIT A-11**

Dear Mr. Bryenton:

Re: BC Hydro
F2017 to F2019 Revenue Requirements Application
Mr. Roger Bryenton request for Late Intervention

On September 2, 2016, the Commission received a late request from you on behalf of the “BC Hydro Ratepayers Association” to intervene in the subject proceeding and sought submissions from parties in this proceeding according to the dates set out in the Commission’s letter, dated September 28, 2016 (Exhibit A-8).

Submissions on this matter were filed by BCSEA, BCOAPO, and BC Hydro, and Mr. Landale filed a reply submission. All parties support your late request to intervene with the exception of BC Hydro. BC Hydro submits that it typically consents to requests for late intervention and in these circumstances the timing of the request does not prejudice BC Hydro and thus poses no concern. However, BC Hydro’s main concern is that you are seeking to intervene on behalf of “BC Hydro Ratepayers Association”, not on your own behalf as an individual. BC Hydro submits that it is unclear whether the members of your Facebook page have consented to your representation. BC Hydro also argues that the name of your organization is inappropriate.

In reply, you raise a number of issues you intend to pursue (Exhibit D-1-1) and further submit that in a recent posting to your Facebook page, “BC Hydro Ratepayers Association” members were asked to approve their membership in an association, to agree with having various directors, and to agree with action(s) the directors take. You suggest that over 30 members have agreed and approved within the hour. (Exhibit D-1-2).

The Commission notes BC Hydro’s argument that allowing an intervention by a ratepayer group, in the absence of clear evidence that its purported members are ratepayers who want to be represented in this proceeding, would be contrary to the public interest. In addition, the Commission’s Rules of Practice and Procedure (9.05) include details on what needs to be included in the informational document, including “a description of its membership, including the membership process if any, and the constituency it represents”. Accordingly, the Commission is not persuaded by your argument that you “unanimously” represent your Facebook members specifically in this proceeding.

However, if you wish to make a request to intervene as an individual, the Commission would consider the application provided that it is in accordance with Rule 9.04 of the Commission’s Rules of Practice and Procedure.

Yours truly,

Original signed by

Laurel Ross
LR/ad