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VIA COMMISSION E-FILING SYSTEM

British Columbia Utilities Commission
6th Floor – 900 Howe Street
Vancouver, BC V6Z 2V3

Attention: Laurel Ross, Acting Commission Secretary

Dear Madame:

**Re BC Hydro F2017-F2019 Revenue Requirements Application (RRA)
Association of Major Power Customers of BC (AMPC)
AMPC Submission re Oral Hearing**

We are legal counsel to AMPC in this matter. Further to the Commission's revised Regulatory Timetable, this letter provides AMPC's submission concerning the appropriateness of an oral hearing in this matter. In short, AMPC continues to disagree with the reverse onus that the Commission has placed on interveners to justify an oral hearing, but for several reasons is now content to address its issues in a written process.

More specifically, consistent with counsel's remarks during the first procedural conference, the starting point for any BC Hydro RRA proceeding should be an oral hearing, except where BC Hydro can demonstrate that specific issues can be addressed through a written process. Reasons justifying a written process include areas where parties do not intend to cross-examine or, more rarely, areas where cross-examination would have limited value. AMPC firmly disagrees with any suggestion that the Commission should generally consider oral cross-examination to be too expensive or too onerous unless interveners can show otherwise. As mentioned during the first procedural conference, there are a number of proceedings under way that vividly illustrate the importance of testing company witnesses' evidence under oath and in person.

As expressed at the first procedural conference, due to limited resources, capped rates, and exempted capital projects, AMPC's narrow focus in this proceeding to date has been BC Hydro's load and rate forecasts. Both topics were addressed in the first round of IRs. During the second procedural conference AMPC expected these topics to



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demand oral cross-examination, particularly the technical details of BC Hydro's econometric load forecasting model. Since then, AMPC has had time to digest the first round of IR responses, and issue a second round to address incomplete and/or misunderstood responses. Assuming that BC Hydro now provides complete responses, AMPC expects that it can satisfactorily address these issues through a written process.

In this regard, AMPC also seeks to avoid diverting scarce BC Hydro resources from the important (i) forthcoming second module of BC Hydro's Rate Design Application, and (ii) general development of potential solutions to the critical issue of the competitiveness of energy-intensive, trade exposed industries in British Columbia.

Please contact the writer if you have any questions.

Yours truly,

Bull, Houser & Tupper LLP

A handwritten signature in black ink, appearing to read 'Matthew D. Keen', written over a horizontal line.

Matthew D. Keen

MDK/roe

c. Carlo Dal Monte, Chairman, AMPC