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April 4, 2017

Via: E-filing

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

Attention: Patrick Wruck, Commission Secretary

Dear Mr. Wruck:

Re: British Columbia Hydro and Power Authority
Inquiry of Expenditures related to the adoption of the SAP Platform
British Columbia Utilities Commission Action on Complaint

We continue to represent the intervener Adrian Dix, MLA.

Pursuant to Commission Order G-26-17, we make the following Information Requests of BC Hydro's witnesses.

These Requests are necessarily tentative because there has not yet been a decision on our March 28, 2017 letter's request for BC Hydro to disclose an apparently relevant Code of Conduct complaint.

Chris O'Riley

1. Your notes from the May 12, 2008 Executive Team meeting (Appendix 3 to your Witness Statement) contain the following statements at page 3.

   more [crossed-out words] than a dir/n
   actually a dec/n – don't see viable options

   a) Please confirm that your notes mean 'more than a direction actually a decision'.
   b) What are the words in line 1 that have been crossed out?
   c) What do you recall of the discussion leading you to make this note?

2. In your Executive Team meeting notes (Appendix 3) on page 3 you say the following.

   - dec/n – what is it? SAP for core ERP systems
   - default to SAP, exceptions where justified
   - need to write on 1 pg.

   Was such a one-page summary ever produced? If so, please provide it.

3. In your notes at Appendix 3, page 3, you list under "governance/org" the word "ABSU". What does ABSU mean?

4. Your Executive Team meeting notes from January 2009 (Appendix 5) contain the following statements.

   IT&T strategy
   - feedback from DL + RG on doc?

   a) Who or what is DL and RG?
   b) On what document(s) were they providing feedback?

Cheryl Yaremko

1. You were the Chair of the Financial System Replacement (FSR) Steering Committee post-September 2008. To your knowledge, was any software company other than SAP ever considered for the FSR project?

Enn Kiudorf

1. You say at page 4 of your Witness Statement that you and George Koyanagi were "assigned the task of preparing a draft response to 'reposition BC Hydro approach' [sic] to the PeopleSoft upgrade *for review by the FSR project steering committee.*"

   a) Did you and/or Mr. Koyanagi provide your briefing note or any other related document to the steering committee for review?
   b) If so, what feedback or instructions did you receive?

2. The Financial System Replacement (FSR) project's risk register (Appendix 3 of your Witness Statement) identifies the following as a risk.

   Regulatory Alignment – In Appendix J of RRA submission, BCH indicated that we would be proceeding with PeopleSoft Upgrade and that SAP option was too expensive. Need to prepare for potential RRA questions on this.

   The risk register goes on to say that BC Hydro's "treatment" for this risk was that the "[p]lan will go to BCUC in June 2009."

   a) Who decided this would be the "treatment" and when did they make that decision?
   b) Who entered the "treatment" into the risk register and when?
   c) Was this the only "treatment" entry ever made in the FSR project risk register?

Greg Reimer

1. At pages 4 and 5 of your Witness Statement, you say that "it was determined the larger PSW [Plan and Schedule Work project] as originally contemplated would be deferred, and that BC Hydro would move forward on two fronts: we would proceed initially with the Supply Chain SAP project to gain further experience with the SAP platform; and we would de-scope the PSW project to confine it to a technical upgrade to deliver immediate benefits for the distribution area of the business."

   a) Who made these decisions?
   b) When did they make these decisions?
   c) What materials did they have before them when they made these decisions?

Sully Wong

1. You received an email from Don Stuckert on October 24, 2008 regarding Undertaking 62.

   a) After this email, did you have any further discussions or communications regarding Mr. Stuckert's testimony?

b) After this email, did you have any further discussions or communications regarding the BC Utilities Commission's oversight of the SAP program?

c) If so, with whom and what was the content of those discussions and communications?

Yours truly,

CAROLINE + GISLASON LAWYERS LLP

Lyndsay Watson

c. Client
eFiling List of Participants