

William J. Andrews

Barrister & Solicitor

1958 Parkside Lane, North Vancouver, BC, Canada, V7G 1X5
Phone: 604-924-0921, Fax: 604-924-0918, Email: wjandrews@shaw.ca

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British Columbia Utilities Commission
Sixth Floor, 900 Howe Street, Box 250
Vancouver, BC, V6Z 2N3
Attn: Patrick Wruck, Commission Secretary
By email: Commission.Secretary@bcuc.com

Dear Sir:

Re: Creative Energy Vancouver Platforms Inc. (Creative Energy),
2017 Long-Term Resource Plan (LTRP)
BC Sustainable Energy Association and Sierra Club BC, Process Comments

By letters of August 1 and 4, 2017 to Creative Energy, the Commission invited comments from interveners in the Creative Energy 2015-2017 Revenue Requirements Application regarding the process by which the Commission will review Creative Energy's 2017 LTRP. BCSEA-SCBC were interveners in the CE 2015-2017 RRA and these are their comments.

Creative Energy said the following about process:

“In Creative Energy’s view, the Commission is not obligated to establish any process... Should the Commission still wish to initiate a process to review Creative Energy’s LTRP submission, Creative Energy submits a streamlined review process would likely be most appropriate given the scale and nature of this utility and LTRP.”

Corix says it does not oppose a streamlined review process but “given the technical nature of the materials submitted with the LTRP, Corix would suggest that a written process with 2 rounds of information requests may be a preferable option.”¹

FortisBC Energy Inc. says that a streamlined review process would be neither practical (not capable of being completed in one day) nor suitable (contentious and new policy issues). FEI says what is necessary is two rounds of IRs, an opportunity for interveners to furnish their own evidence, and legal argument.

BCSEA-SCBC suggest that the regulatory process include one round of IRs, an opportunity for interveners to file evidence, a round of IRs on intervener evidence if any, a streamlined review process, and an option for final written arguments if so decided by the panel during the SRP.

In BCSEA-SCBC’s view, FEI’s request for an opportunity for interveners to file evidence should be granted in the interests of fairness. Correspondingly, there should be an opportunity for IRs on intervener evidence (if there is any). BCSEA-SCBC acknowledge FEI’s point that in its view the CE LTRP raises new policy issues. However, BCSEA-SCBC believe that a one-day SRP would

¹ Corix letter of August 11, 2017.

http://www.bcuc.com/Documents/Proceedings/2017/DOC_49789_Corix_Comments_on_CE_2017_LTRP_process.pdf

be a more effective mechanism than a second round of IRs to CE and that one day SRP should be sufficient to accomplish a meaningful exchange of information and argument. If necessary, the panel at the SRP could decide to invite final written arguments based on submissions from the parties at the time.

All the above is respectfully submitted.

Yours truly,

William J. Andrews

A handwritten signature in black ink, appearing to be 'WJ Andrews', written over a horizontal line.

Barrister & Solicitor

cc. Robert Hobbs, Creative Energy
Ian Wigginton, Corix
Diane Roy, FEI