

August 14, 2017

VIA EMAIL

Mr. Patrick Wruck
Commission Secretary and Manager
Regulatory Support
British Columbia Utilities Commission
Suite 410, 900 Howe Street
Vancouver, BC V6Z 2N3



Reply to: Leigha Worth
lworth@bcpiac.com
Ph: 604-687-3034
Our file: 7659

Dear Mr. Wruck:

Re: Creative Energy Vancouver Platforms Inc. ~ 2017 Long-Term Resource Plan

Please be advised that we make the following submissions regarding the above-noted process on behalf of our client groups, known collectively in regulatory processes before the BC Utilities Commission as BCOAPO *et al.* ("BCOAPO"), in accordance with the Commission's instructions in Exhibit A-3.

BCOAPO would like to begin its submission by making it clear that it does not at this time consider this LTRP the appropriate subject-matter for a streamlined review process, no matter the "scale and nature of this utility and LTRP." BCOAPO respectfully submits that any LTRP is a complex and important planning roadmap that requires sufficient process to ensure that the applicant utility is engaging in the best possible planning and prioritization of its future projects to ensure it continues to provide safe, reliable, and affordable service to its ratepayers going forward.

That is not to say that BCOAPO would propose a process that is out of line with the comparatively modest size of Creative Energy: instead, in recognition of that fact and the sincere desire to ensure the amount of process is appropriate, BCOAPO submits that two rounds of IR's are appropriate to allow parties to reasonably explore LTRP issues with the full process to be determined after that initial discovery is complete. Then, the Commission can examine the issues that have been brought to light, Creative Energy's responses to those issues, and the importance of those issues going forward to craft a process that strikes a balance between regulatory efficiency and the importance of sufficient Commission supervision and public process.

Yours truly,

Public Interest Advocacy Centre

Leigha Worth
Barrister & Solicitor
Executive Director