

22 April 2021

**VIA E-FILING**

Patrick Wruck  
Commission Secretary  
BC Utilities Commission  
6th Floor 900 Howe Street  
Vancouver, BC V6Z 2N3



Reply to: Leigha Worth  
ED@bcpiac.org  
Ph: 604-687-3034  
Our File: 7100.911

Dear Mr. Wruck,

**Re: Creative Energy Vancouver Platforms Inc. (Creative Energy) - 2021 Long Term Resource Plan (LTRP)  
BCOAPO et al. Final Argument on Appendix A of the Application**

Please be advised that we submit the following on behalf of our clients in this matter, the more than one hundred thousand members and clients served by the following community-based organizations: the British Columbia Old Age Pensioners' Organization, Active Support Against Poverty, Council of Senior Citizens' Organizations of BC, Disability Alliance BC, and the Tenant Resource and Advisory Centre, known collectively in this process as "BCOAPO et al."

Enclosed please find the BCOAPO's Final Argument on Appendix A with respect to the above noted Application. Because our position and concerns touch on evidence Creative Energy has filed confidentially, we have filed a second confidential submission with the BCUC only.

If you have any questions, please do not hesitate to contact the undersigned.

Sincerely,  
**BC PUBLIC INTEREST ADVOCACY CENTRE**

*Original on file signed by:*

Leigha Worth  
Executive Director | General Counsel

encl.

**BRITISH COLUMBIA OLD AGE PENSIONERS' ORGANIZATION, ACTIVE SUPPORT  
AGAINST POVERTY, COUNCIL OF SENIOR CITIZENS' ORGANIZATIONS  
OF BC, DISABILITY ALLIANCE BC, AND THE TENANT  
RESOURCE AND ADVISORY CENTRE ("BCOAPO")**

**Creative Energy Vancouver Platforms Inc. (Creative Energy)  
- 2021 Long Term Resource Plan (LTRP)**

**BCOAPO et al. Final Argument on Appendix A**

**22 April 2021**

**Introduction**

On January 13, 2021, Creative Energy Vancouver Platforms Inc. (CEV), applied to British Columbia Utilities Commission (BCUC) for approval of its 2021 Long-Term Resource Plan (LTRP) as well as acceptance of a predevelopment expenditure schedule (Expenditure Schedule) associated with studying and developing a low carbon energy or decarbonization project (the Boiler Electrification Project or Project) contained in a Confidential Appendix A to the LTRP (Application).<sup>1</sup> On March 26, 2021, Creative Energy also submitted a public but redacted, version of Appendix A.<sup>2</sup>

The BCUC determined (Orders G-40-21 and G-93-21)<sup>3</sup> that the regulatory review process would proceed in two streams. The first stream relates to the Appendix A of the Application and the second stream relates to the LTRP. This Final Argument deals with the first stream : Appendix A of the Application and is provided on behalf of the client groups known in this and other regulatory proceedings before the BCUC as "BCOAPO" or "BCOAPO *et al.*". BCOAPO has a long history of effective and efficient interventions made on behalf of residential ratepayers who seek not only the best outcome for the majority, but also those amongst them who are the most economically vulnerable. These interventions before the BCUC actively work to further the best interests of residential ratepayers while respecting the need for regulatory efficiency.

**Summary of BCOAPO Position**

BCOAPO has reviewed the evidence on the record in this proceeding and accepts that:

- CEV's assessment of the policy, planning, legislative environment and customer expectations reasonably demonstrates that advancing the feasibility assessment of the decarbonization Project is directionally consistent with the public interest; and
- CEV has, in our submission, provided adequate evidence upon which the BCUC should accept the Expenditure Schedule in advance of the filing of a CPCN in addition to persuasive evidence of stakeholders support for incurring the costs to analyze the business case for the Project.

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<sup>1</sup> Exhibit B-1, B-1-1

<sup>2</sup> Exhibit B-1-2

<sup>3</sup> Exhibits A-2 & A-5

Notwithstanding BCOAPO's position on the public interest and BCUC acceptance of the Project Expenditure Schedule, BCOAPO has the following concerns and recommendations to the BCUC:

It would be beneficial if CEV would provide two additional pieces to the puzzle to address any possible remaining concerns in its Reply:

- a narrative to further the Commission and Interveners' understanding of the potential emissions reductions from the decarbonization Project; and  
an explanation of how the Utility expects to mitigate the accuracy range of the transmission costs in the contemplated CPCN.

While we recognize that section 75 of the *Utilities Commission Act* explicitly states, "The commission must make its decision on the merits and justice of the case, and is not bound to follow its own decisions," we see value in our recommendation to this Panel explicitly cite this section of the Act in its Decision so there is no misapprehension by those who might seek to make future CEV applications of a similar nature.

Finally, BCOAPO recommends that this BCUC Panel explicitly highlight its expectations for robust consideration of alternative options for low carbon energy and direct CEV to address measures and scenarios to manage and mitigate the rate impact of the Project in the contemplated CPCN. We see this as a helpful means by which the Utility can go forward to prepare its Application in a manner that will hopefully align with the goal of regulatory efficiency.

Because the balance of our positions and concerns touch on evidence CEV has filed confidentially, we have filed a second confidential submission on this issue to allow us to make specific illustrative references to the confidential record.

ALL OF WHICH IS RESPECTFULLY SUBMITTED:

Original on file signed by

Leigha Worth  
Executive Director | General Counsel

Original on file signed by

Irina Mis  
Staff Lawyer

CONFIDENTIAL SUBMISSION FILED WITH BCUC ONLY