



ORDER NUMBER
G-28-21

IN THE MATTER OF
the *Utilities Commission Act*, RSBC 1996, Chapter 473

and

British Columbia Hydro and Power Authority
Long-Term Resource Plan Filing Date

BEFORE:

D. M. Morton, Panel Chair
C. M. Brewer, Commissioner
R. I. Mason, Commissioner

on January 27, 2021

ORDER

WHEREAS:

- A. Pursuant to section 44.1 (2) of the *Utilities Commission Act* (UCA), subject to subsection (2.1), a public utility must file a long-term resource plan with the British Columbia Utilities Commission (BCUC) in the form and at the times the BCUC requires;
- B. Pursuant to section 44.1, subsection (2.1) of the UCA, British Columbia Hydro and Power Authority (BC Hydro) need not file a long-term resource plan before February 28, 2021;
- C. By Order G-205-20 dated July 30, 2020, the BCUC established a regulatory timetable for the review of the BC Hydro long-term resource plan filing date and ordered that by August 20, 2020, BC Hydro submit to the BCUC, with rationale:
 1. the date by which BC Hydro will file its next long-term resource plan; and
 2. a proposal for an interim filing of BC Hydro's current planning context that would, in the absence of a recently filed long-term resource plan, aid in the review of BC Hydro applications filed prior to the BCUC review of the next BC Hydro long-term resource plan;
- D. The following parties registered as interveners in this proceeding: Association of Major Power Customers of British Columbia (AMPC), British Columbia Community Solar Coalition (BCCSC), British Columbia Old Age Pensioners' Organization et al. (BCOAPO), BC Sustainable Energy Association and Sierra Club (BCSEA), Clean Energy Association of BC (CEABC), Coastal First Nations/Great Bear Initiative (CFN-GBI), the Commercial Energy Consumers Association of British Columbia (CEC), Edlira Gjoshe (Gjoshe), David Ince (Ince), Movement of United Professionals (MoveUP), and Surplus Energy Match Inc.;
- E. By letter dated August 20, 2020, BC Hydro submits that it plans to file its next long-term resource plan in September 2021 (BC Hydro Proposal). Additionally, BC Hydro proposed to file in October 2020 a summary of

the default inputs that BC Hydro will be using for consultation and in Spring 2021 a draft long-term resource plan;

- F. By September 3, 2020, interveners filed their submissions on the BC Hydro Proposal. On September 17, 2020 BC Hydro filed its reply submission;
- G. By letter dated September 25, 2020, BC Hydro requested that the BCUC suspend the proceeding until 30 days after the Government of BC has been sworn-in and a Cabinet has been appointed;
- H. By Order G-260-20 dated October 19, 2020, the BCUC directed BC Hydro to file a supplementary submission with regard to a filing date for the 2021 Integrated Resource Plan (IRP) and a proposal for an interim filing of BC Hydro's current planning context, 30 days after the Government of BC has been sworn-in and a Cabinet has been appointed;
- I. On December 21, 2020, BC Hydro filed supplementary information stating its expectation to file its next IRP in December 2021, and that BC Hydro is able to provide an interim filing of the default inputs that it is using for consultation by January 15, 2021 (Supplementary Submission). BC Hydro also proposes a second interim filing in June 2021 to provide the draft 2021 IRP that it will be releasing for consultation;
- J. By January 11, 2021, interveners filed their submissions on BC Hydro's Supplementary Submission;
- K. On January 15, 2021, BC Hydro submitted an interim filing of current planning context;
- L. On January 18, 2021, BC Hydro filed its reply to intervener submissions; and
- M. The BCUC determines that establishing a filing date for BC Hydro's long-term resource plan is warranted.

NOW THEREFORE pursuant to section 44.1 of the UCA and for the reasons outlined in Appendix A to this order, the BCUC orders BC Hydro to file its next long-term resource plan no later than December 31, 2021.

DATED at the City of Vancouver, in the Province of British Columbia, this 27th day of January 2021.

BY ORDER

Original signed by:

D. M. Morton
Commissioner

Attachment

British Columbia Hydro and Power Authority
Long-Term Resource Plan Filing Date

REASONS FOR DECISION

1.0 Introduction

British Columbia Hydro and Power Authority's (BC Hydro) previous long-term resource plan, or Integrated Resource Plan (IRP), was approved by the Government of BC in 2013, at which time BC Hydro's long-term resource plans were not subject to review by the British Columbia Utilities Commission (BCUC).

Pursuant to section 44.1 (2) of the *Utilities Commission Act (UCA)*, subject to subsection (2.1), a public utility must file a long-term resource plan with the BCUC in the form and at the times the BCUC requires. Section 44.1(2.1) of the UCA states that BC Hydro need not file a long-term resource plan before February 28, 2021.

By Order G-205-20 dated July 30, 2020, the BCUC established a regulatory timetable for the review of BC Hydro's long-term resource plan filing date and ordered that by August 20, 2020, BC Hydro submit to the BCUC, with rationale:

1. the date by which BC Hydro will file its next long-term resource plan; and
2. a proposal for an interim filing of BC Hydro's current planning context that would, in the absence of a recently filed long-term resource plan, aid in the review of BC Hydro applications filed prior to the BCUC review of the next BC Hydro long-term resource plan.

BC Hydro provided its submission in response to this directive by letter dated August 20, 2020 (BC Hydro Proposal), which states:

- BC Hydro plans to file its next Integrated Resource Plan (IRP) with the BCUC by September 2021;¹ and
- BC Hydro proposes two interim filings to address the BCUC's request for BC Hydro's planning context:
 - A summary of the default inputs to be used for consultation, to be filed in October 2020; and
 - The draft IRP which will be subject to further consultation, in Spring 2021.²

The following parties registered as interveners in this proceeding:

- Association of Major Power Customers of British Columbia (AMPC);
- British Columbia Community Solar Coalition (BCCSC);
- British Columbia Old Age Pensioners' Organization et al. (BCOAPO);
- BC Sustainable Energy Association and Sierra Club (BCSEA);
- Clean Energy Association of BC (CEABC);
- Coastal First Nations/Great Bear Initiative (CFN-GBI);
- Commercial Energy Consumers Association of British Columbia (CEC);

¹ Exhibit B-2, p. 1

² Exhibit B-2, pp. 4-5

- Edlira Gjoshe (Gjoshe);
- David Ince (Ince);
- Movement of United Professionals (MOVEUP); and
- Surplus Energy Match Inc.

Following intervener submissions on the BC Hydro Proposal, by letter dated September 25, 2020, BC Hydro requested the BCUC suspend the proceeding until 30 days after the Government of BC has been sworn-in and a Cabinet has been appointed following the provincial election. By Order G-260-20 dated October 19, 2020, the BCUC directed BC Hydro to file a supplementary submission with regard to a filing date for the 2021 IRP, an update on consultation activities and a proposal for an interim filing of BC Hydro's current planning context, 30 days after the Government of BC has been sworn-in and a Cabinet has been appointed. On December 21, 2020, BC Hydro filed supplementary information, which is summarized in the next section.

2.0 BC Hydro Supplementary Submission

In BC Hydro's supplementary submission dated December 21, 2020 (Supplementary Submission), BC Hydro submits that it expects to file its 2021 IRP in December 2021. BC Hydro states that during the provincial election campaign, it received guidance from the Government of BC advising that public communications by Crown Corporations during the election period should be limited to public health and safety and statutory communications only. Accordingly, consultation meetings originally scheduled for September and October 2020 were deferred during this time and meetings were rescheduled from late-November 2021, resulting in a two month delay to the original schedule.³ BC Hydro submits consultation on the draft IRP continues to be 12 weeks but has shifted from the April to June period to the June to September period, with a break in August as many Indigenous Nations close their offices during that time, adding an additional month to the overall schedule.⁴

Otherwise, BC Hydro continues to rely on its previous submissions to support the reasonableness of its proposed schedule. In Exhibit B-3, BC Hydro noted that all interveners either accepted, or did not oppose, a September 2021 filing date for the IRP, which reflected a six-month approach to consultation.⁵

BC Hydro filed an interim filing of the default inputs that it is using for consultation with the BCUC on January 15, 2021. BC Hydro also proposes a second interim filing in June 2021 to provide the draft 2021 IRP that it will be releasing for consultation.⁶

Intervener positions

The majority of interveners who responded to BC Hydro's supplementary submission accepted or supported a filing date of December 2021 for BC Hydro's next long-term resource plan.⁷

AMPC does not support a further postponement of BC Hydro's IRP filing date and submits an additional three-month delay in BC Hydro's IRP filing date is not warranted and does not align with the one-month period of the provincial election blackout from September 21 to October 24, 2020. AMPC notes the governing party was re-

³ Exhibit B-7, pp. 2–3.

⁴ *Ibid.*, p. 3.

⁵ *Ibid.*, p. 4.

⁶ *Ibid.*, p. 5.

⁷ BCSEA, Exhibit C1-4; CEABC, Exhibit C2-4; MoveUP, Exhibit C3-4; CEC, Exhibit C6-4; BCOAPO, Exhibit C10-3; Surplus Energy, Exhibit C11-3.

elected, and the Minister of Energy, Mines and Petroleum Resources which includes BC Hydro in its portfolio, has not changed. AMPC is not persuaded BC Hydro cannot modify its timeline to fulfill its scheduled activities.⁸

In reply to AMPC, BC Hydro states its Supplementary Submission provided a detailed update on the re-start of consultation activities following the provincial election and the associated timing impact. BC Hydro submits it was important to know the results of the election before re-starting consultation activities because a change in government could have led to a change in policy direction. BC Hydro adds that to maintain a September 2021 filing date, it would need to significantly curtail the opportunity for follow-up consultation on the draft IRP, which it submits is important and should not be curtailed. BC Hydro submits a curtailed consultation process could lead to a longer and more contentious regulatory process.⁹

Panel determination

The Panel directs BC Hydro to file its next long-term resource plan with the BCUC no later than December 31, 2021.

While the Panel is cognisant of the impact of continued delays to the filing of the 2021 IRP, the Panel acknowledges the importance of the two-phased consultation activities that BC Hydro is undertaking and planning. The Panel accepts BC Hydro's explanation for the delays to both phases of consultation and the resulting delay in the overall schedule from the originally proposed filing date of September 2021.

The Panel acknowledges that BC Hydro has now filed planning context information with the BCUC, which provides a summary of the default inputs that BC Hydro is using to conduct consultation on the 2021 IRP, and notes BC Hydro's intention to file a draft IRP in June 2021. The Panel notes that both filings may be used in the review of other BC Hydro applications before the BCUC until the 2021 IRP is filed.

3.0 Other matters arising

BCSEA submits that the BCUC should require BC Hydro to state in its proposed October 2020 filing how it will address low-carbon electrification in the 2021 IRP, for review and direction by the BCUC. BCSEA submits BC Hydro's intention is to limit its treatment of electrification in the 2021 IRP to load and supply impacts. BCSEA says that there should be further process so that the BCUC can provide direction to BC Hydro.¹⁰

CEABC agrees with BCSEA's proposal.¹¹ However, MoveUP says that while this issue is important, it should not be singled out, and notes that electrification will be an issue in the Comprehensive Review of BC Hydro Phase 2 Report, driven largely by government policy.¹²

BC Hydro agrees that the BCUC should initiate a process to determine whether the IRP should include "long-term plans and targets for low-carbon electrification," but makes no submissions on this issue at this time.¹³

⁸ Exhibit C5-3, pp. 1–2.

⁹ Exhibit B-9, pp. 1–2.

¹⁰ Exhibit C1-2, pp. 2–3; Exhibit C1-4, p. 1.

¹¹ Exhibit C2-2, p. 3.

¹² Exhibit C3-2, pp. 1–2.

¹³ Exhibit B-3, pp. 4–5.

Panel determination

The Panel declines ordering additional regulatory process to determine whether the IRP should include “long-term plans and targets for low-carbon electrification”¹⁴ in the 2021 IRP. The BCUC’s Resource Planning Guidelines provide guidance to BC Hydro to include both “planning context” and “a range of gross (pre-DSM) demand forecasts”¹⁵ in its IRP application. To the extent that BC Hydro has long-term plans and targets for low-carbon electrification to justify its demand forecasts, the Panel is satisfied that BC Hydro will provide them in its IRP application in the normal course. Electrification planning is an issue driven at least in part by government policy, and there is no obligation for BC Hydro to produce such plans outside of how they affect the key components of the IRP.

¹⁴ C1-4, p. 1.

¹⁵ Resource Planning Guidelines, p. 3. https://www.bcuc.com/Documents/Guidelines/RPGuidelines_12-2003.pdf