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March 15, 2011

British Columbia Utilities Commission
Sixth Floor, 900 Howe Street, Box 250
Vancouver, BC, V6Z 2N3
Attn: Erica Hamilton, Secretary
By Web Posting

Dear Madam:

Re: British Columbia Hydro and Power Authority
F2012-F2014 Revenue Requirements Application
Project No. 3698622/Order G-40-11

I am writing to register the B.C. Sustainable Energy Association and the Sierra Club of British Columbia as intervenors in the above-noted proceeding. I will refer to them as BCSEA, *et al.*

BCSEA is a non-profit association of citizens, professionals and practitioners committed to promoting the understanding, development and adoption of sustainable energy, energy efficiency and energy conservation in British Columbia. BCSEA has eight chapters across B.C. and approximately six hundred and fifty individual and corporate members. Many of BCSEA's members are ratepayers of BC Hydro. BCSEA's goals include sustainable energy, energy efficiency and energy conservation in British Columbia.

SCBC is a non-profit organization of British Columbians from all walks of life who care about a broad range of environmental issues including climate change and clean energy. SCBC has over 5,000 members and supporters across the province, many of whom are ratepayers of BC Hydro who want the electricity they purchase to come from a sustainable electricity system.

Historically, BCSEA, *et al* participated in the Commission's review of BC Hydro's revenue applications for F07-F08, F09-F10 and F11, including participation in the negotiated settlement processes involved.

In response to paragraph 9 of Order No. G-40-11, BCSEA and SCBC participate in this proceeding on behalf of their members' interests as ratepayers. Their principal interest in the rate impacts of the F12-F14 revenue requirement is in rates that are just, reasonable and not unduly discriminatory as required by the *Utilities Commission Act* and as indicated by the Bonbright principles.¹ In this context, BCSEA, *et al* are concerned with, among other things, the rates consequences of conservation, efficiency and intergenerational equity.

BCSEA, *et al* have not yet identified all of the specific issues they will address in this RRA proceeding. However, topics of concern to them include:

- the mechanism for bringing deferral account balances into the revenue requirement,

¹ BCUC Order G-45-11 Reasons for Decision, March 14, 2011, p.5.

- rate increase smoothing over the test period,
- the drivers of increased revenue requirements during the test period, and
- BC Hydro's cost management and productivity savings measures.

In terms of level of involvement in the proceeding, BCSEA, *et al* will prioritize and focus on those issues that affect them the most directly and regarding which they feel their participation will add the most value to the proceeding.

Copies of correspondence and other filings should be provided to:

- William Andrews, wjandrews@shaw.ca
- Thomas Hackney, thackney@shaw.ca

Thank you for your attention to this matter.

Yours truly,

William J. Andrews



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cc. Distribution List by email