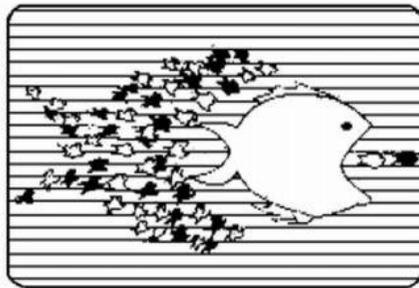


The British Columbia Public Interest Advocacy Centre

208-1090 West Pender Street
Vancouver, BC V6E 2N7
Coast Salish Territory
Tel: (604) 687-3063 Fax: (604) 682-7896
email: support@bcpiac.com
<http://www.bcpiac.com>



Eugene Kung	687-3006
Ros Salvador	488-1315
Leigha Worth	687-3044
<i>Barristers & Solicitors</i>	
Hasan Alam	687-3017
<i>Articled Student</i>	

BC HYDRO – REVENUE REQUIREMENTS F2012-F2014	EXHIBIT C1-9
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January 27, 2012

Our File: 7481

Ms. Alanna Gillis
Acting Commission Secretary
BC Utilities Commission
6th Floor 900 Howe Street
Vancouver, BC V6Z 2N3

Dear Ms. Gillis:

**RE: British Columbia Hydro and Power Authority (“BC Hydro”)
F2012-14 Revenue Requirements Application
Project No. 3698622/Order G-40-11**

We continue to represent BCOAPO et al. in this proceeding as the representative voice of the Applicant’s residential ratepayers and in particular those with low and fixed incomes. BCOAPO files this letter in response to the Commission Panel’s January 19, 2012 letter (Exhibit A-22) which invited interveners to make submissions on the interim rate for BC Hydro’s upcoming fiscal year, the second of three fiscal years included in the above noted Revenue Requirement Application.

In this particular process, our clients face a novel situation. Normally, after an application is filed our clients have a clear goal: ensure low rates sufficient to maintain a safe and reliable electrical utility while recognizing that certain matters of social importance like environmental concerns and First Nations rights and consultation may have price tags attached. Normally, this requires the undersigned to examine the Revenue Requirement to ensure the Utility is acting in good faith, being responsible and instituting all reasonable efficiencies to the benefit of its ratepayers. For the first time in recent memory, our clients are being forced to consider whether their electrical utility is, as a result of direct government involvement in the Utility’s ratemaking process, applying for rates sufficient to their needs.

A year ago, BC Hydro applied for rate increases over the three year test period that were publically and therefore politically unpopular. The provincial government intervened and in very short order a Review Panel made recommendations including lower rate increases that the Utility has, through various means, managed to implement. Without commenting on the means by which this was accomplished or committing to a position on the proper

levels of the Revenue Requirement, our clients feel compelled to add their voice to those speaking in favour a modification to F2013's rates and those who are not.

Only in deference to the extremely unusual circumstances present in this case, we are recommending that BC Hydro's applied for rate increase of 3.9% for the upcoming fiscal be granted on an interim basis. In addition to the uncertainty regarding whether the Commission Panel will find the applied-for rates acceptable, too high or too low, we agree with Mr. Wallace's comment, "[t]o the best of our knowledge there is no precedent for this Commission granting a higher interim rate than that sought by the Applicant and we should not create one now."

Sincerely,
BC PUBLIC INTEREST ADVOCACY CENTRE

Original on File Signed by

Leigha Worth
Executive Director
Barrister & Solicitor