
From: Roger Bryenton <roger.bryenton@earthlink.net>
Sent: Tuesday, October 13, 2015 4:05 PM
To: Commission Secretary BCUC:EX; Roger Bryenton
Subject: Re: BCH RDA Intervenor Registration

Hello and thank you for your assistance

There are several issues:

- 1 Object to tight time frame - one week to read, understand and respond to 4,800 pages
- 2 Rate Design Criteria - Revenue Requirements - embedded vs marginal cost approaches and problems with major expenses, forecasting expenses and cash flow (revenue). Determination of LRMC's under high growth- high debt scenario vs incremental growth.. Problems with forecasting methodologies under high growth high debt scenarios. Necessity of Long-Term ie 20 to 30 year LRMC determination for major projects. Is the impending Site C project a "incremental", "most cost-effective" (BCHydro criteria) solution to electricity demand?
The need for detailed examination and assessment "incremental" and "most cost-effective" solutions to meeting electricity demand
- 3 Accounting practices that capitalize interest costs rather than expense them as they are incurred. Accounting for major projects as expenses are incurred - annually, to examine the effect on LRMC.
- 4 Risks of RDA errors and techniques
- 5 Cost of Service -Long term sensitivity of Costs to interest rates and debt financing, especially for large projects. Residential - major DSM expenses for electrically heated buildings, especially rental units. Necessity of programs where gas heat is not offered. Other programs and BCUC directions to BCH to move from "construction" - dams, to "conservation" - heat, comfort and service. Commercial and Industrial costs and programs involved in long-term shifts from high to low consumption. An attitude of cooperation, vs seller - buyer of power.
- 6 Shift from "more growth" to "better use" of electricity as a social imperative. BCUC and BCH roles.

My anticipated involvement is substantial. I have over 30 years of experience with energy systems and analyses in BC and elsewhere. I have prepared a 6 page outline of issues to be addressed and perhaps as many as 20 BCUC directives for BCH's action. I have referenced an analysis of BCH's IRP that I performed as background material. Both are ready to upload.

Thank you
Roger Bryenton
310 918-9131

On 10/13/2015 2:09 PM, Commission Secretary BCUC:EX wrote:

Dear Mr. Bryenton,

Thank you for your email. As noted in our email to you dated October 9, 2015 (attached), parties requesting to participate must identify the issues they intend to pursue and indicate the extent of their anticipated involvement in the review process. At this time, we have received your online registration but still require a statement of the issues you intend to pursue and your anticipated involvement in order to review and process your intervenor application.

Please let me know if you have any questions.

Regards,

Laura Sharpe
Manager, Information Services Group
British Columbia Utilities Commission
Phone: 604.660.4700 | Fax: 604.660.1102 | Toll Free: 1.800.663.1385

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From: Roger Bryenton [<mailto:roger.bryenton@earthlink.net>]

Sent: Tuesday, October 13, 2015 10:07 AM

To: Commission Secretary BCUC:EX

Subject: BCH RDA Intervenor Registration

Dear BCUC

Can you please verify that my registration as an Intervenor has been processed as Roger Bryenton? I will be posting a submission shortly.

Thank you

Roger Bryenton

310 918-9131