



CANADIAN ASSOCIATION  
OF PETROLEUM PRODUCERS

Canada's Oil and Natural Gas Producers

October 14, 2105

Delivered via email to [Commission.Secretary@bcuc.com](mailto:Commission.Secretary@bcuc.com)

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

Dear Sirs/Mesdames:

Re: British Columbia Hydro and Power Authority  
2015 Rate Design Application

Further to your September 30 letter, please register the Canadian Association of Petroleum Producers as an Intervener in BC Hydro's 2015 Rate Design Application. All future filings and Commission correspondence should be sent to:

Mr. Mark Pinney  
Manager, Markets & Transportation  
Canadian Association of Petroleum Producers  
2100, 350 - 7<sup>th</sup> Avenue S.W.  
Calgary, AB. T2P 3N9  
Phone: (403 267 1173) Email: [mark.pinney@capp.ca](mailto:mark.pinney@capp.ca)

CAPP has the following submissions on the issues identified in Appendix B to Commission Order G-156-15:

- 1) CAPP submits that the F2016 COS should be limited in its use in the 2015 Rate Design Application to a contextual document for rate design. CAPP believes this is appropriate since BC Reg 140/2015 Order-in-Council 405 prevents the Commission from making changes to rates for the purpose of changing the revenue-cost ratio for a class of customers until after F2019. CAPP understands that BC Hydro will be updating its COS on an annual basis over this period of time. CAPP submits that it would be more appropriate to engage in an in-depth review of BC Hydro's COS at a time when the Commission is in a position to consider rate changes for the purpose of changing the revenue-cost ratio for different customer classes.
- 2) CAPP has no submissions on this issue.
- 3) (i) CAPP's members are primarily high load factor Rate Schedule 1823 customers and are generally not in a position to take advantage of BC Hydro's proposed freshet rate pilot.

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However, CAPP is amenable to an expedited process for the freshet rate pilot so that other customers could have an opportunity to take advantage of this service in 2016.

(ii) CAPP supports BC Hydro's proposed Pricing Principles for Rate Schedule 1823. CAPP also supports BC Hydro's proposed process for review of these principles consisting of one round of Information Request followed by a Streamline Review Process in January 2016.

(iii) CAPP has no submissions on the review process for other Transmission Service rates.

- 4) CAPP has no submissions on this issue.
- 5) CAPP supports the need for efficient for efficient application and review processes. As a result of this consideration, as the Commission is aware, BC Hydro made a decision to split the 2015 Rate Design Application into two phases. CAPP's members are primarily affected by issues that will not be addressed until Phase 2 of the proceedings. CAPP respectfully requests that the Commission consider this issue in its determinations on the appropriate processes for Phase 1 of the proceeding so that Phase 2 can take place as expeditiously as possible.

Sincerely,

A handwritten signature in black ink that reads "Mark Pinney". The signature is written in a cursive style with a large, sweeping initial "M" and a long, horizontal tail stroke.

Mark Pinney

Cc Mr. Tom Loski, BC Hydro