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October 26, 2015

VIA ELECTRONIC MAIL

British Columbia Utilities Commission
 Sixth Floor, 900 Howe Street
 Vancouver, BC
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**Attention: Ms. Erica Hamilton,
 Commission Secretary**

Dear Sirs/Mesdames:

**Re: British Columbia Hydro and Power Authority (BC Hydro) 2015 Rate Design
 Application, BCUC Order No. G-156-15**

We are counsel to the Commercial Energy Consumers Association of British Columbia (CEC). The CEC wishes to provide reply comments on the other participants' comments as provided for in BCUC Order G-156-15 and specifically on the submissions of BCSEA-SCBC (Exhibit C3-2, Page 2), BCOAPO (Exhibit C2-2, Page 2), and COPE 378 (Exhibit C4-2, Page 2) in regard to the BC Hydro proposal for an expedited review process for Large General Service and Medium General Service (LGS/MGS) 100% Part 1 Pricing proposals.

The CEC submits that BC Hydro has put forward persuasive submissions on why it is seeking an expedited review for its LGS/MGS 100% Part 1 Pricing proposal. BCSEA-SCBC, BCOAPO and COPE 378 choose not to respond to the justifications put forward by BC Hydro and do not appear to oppose the proposal but instead seek to influence an unrelated area of the Application in exchange for their support.

The CEC submits that there is no logical basis for the BCSEA-SCBC, BCOAPO and COPE 378's conditioning approval of BC Hydro's request in regard to the LGS/MGS 100% Part 1 Pricing proposals on dealing with the unrelated matter in the Application, the effective date for BC Hydro's proposed Minimum Connection Charge. If BCSEA-SCBC, BCOAPO and COPE 378 have material persuasive arguments on their merits to support their request in regard to the Minimum Connection Charge, they should make those submissions.

However, consideration of the Connection Charge issue should be an irrelevant consideration of the Commission in assessing BC Hydro's proposal for dealing with the Large General Service and Medium General Service 100% Part 1 Pricing proposals.

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ALL OF WHICH IS RESPECTFULLY SUBMITTED.

Yours truly,

OWEN BIRD LAW CORPORATION

A handwritten signature in black ink, appearing to read "C. Weafer", is positioned above the printed name.

Christopher P. Weafer

CPW/jlb
cc: CEC
cc: BC Hydro
cc: Registered Intervenors