

ALLEVATO QUAIL & WORTH

BARRISTERS AND SOLICITORS

Allevato & Quail Law Corporation
Leigha L. Worth Law Corporation

February 16, 2016

our file 15-070
Leigha Worth
direct: 604-424-8634
lworth@aqwlaw.ca
via email

British Columbia Utilities Commission
Sixth Floor, 900 Howe Street, Box 250
Vancouver, BC V6Z 2N3

Attention: Ms. Erica Hamilton, Commission Secretary

Dear Mesdames/Sirs:

**RE: British Columbia Hydro and Power Authority 2015 Rate Design Application ~
Project No.3698781**

Please be advised that we make the following submissions on behalf of our client, MoveUP, further to the Commission Panel's February 11, 2016 letter that requested submissions on four issues relating to the Negotiated Settlement Process for the Cost of Service Study and Rate Class Segmentation in the above noted matter.

1. Confirmation from the parties who intend to participate in the settlement discussions.

We wish to confirm that the undersigned intends to attend and participate in the settlement discussions.

2. Submissions from registered interveners on BC Hydro's submission in its letter dated January 21, 2016. Specifically, BC Hydro states that those Commission staff identified by the Chair at the commencement of the procedural conference should be established by the Panel as Active Participants for any F2016 COS NSP in accordance with Part IV, section 1(iv) (a) of the NSP Guidelines.

MoveUP does not oppose BC Hydro's proposal that the Commission staff identified by the Chair at the Procedural Conference be designated as Active Participants in the F2016 COS NSP.

3. Comments on the specific issues related to the COSS and rate class segmentation including the street lighting rate class proposal that parties wish to have addressed in the NSP.

In addition to issues pursued in IR's, MoveUP intends to pursue an agreement that BC Hydro present modelling based on the Marginal Cost of Service in the next RDA even if it intends to continue with an application based on the current embedded COS.

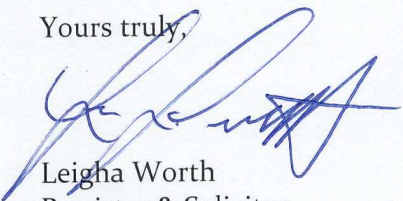
405-510 West Hastings St. Vancouver BC V6B 1L8 tel (604)424-8631 fax (604) 424-8632
on unceded land of the Coast Salish people, whom we thank for their forbearance

4. Comments from all parties on the recommendation by the Commission Panel that the Facilitator of the NSP be Ms. Liisa O'Hara.

MoveUP and the undersigned are well acquainted with Ms. O'Hara's past work at the BCUC and as a result, we support the Commission Panel's recommendation that she facilitate this NSP.

ALL OF WHICH IS RESPECTFULLY SUBMITTED

Yours truly,

A handwritten signature in blue ink, appearing to read 'Leigha Worth', is written over the typed name.

Leigha Worth
Barrister & Solicitor