

William J. Andrews

Barrister & Solicitor

1958 Parkside Lane, North Vancouver, BC, Canada, V7G 1X5
Phone: 604-924-0921, Fax: 604-924-0918, Email: wjandrews@shaw.ca

April 22, 2016

British Columbia Utilities Commission
Sixth Floor, 900 Howe Street, Box 250
Vancouver, BC, V6Z 2N3
Attn: Laurel Ross, Acting Commission Secretary
By Web Posting

Dear Madam:

Re: British Columbia Hydro and Power Authority 2015 Rate Design Application (RDA)
Order G-156-15, Order G-175-15
BC Sustainable Energy Association and Sierra Club BC
Comments on Review Process for Residential E-Plus Rate Design

The following are the comments of the interveners BC Sustainable Energy Association and Sierra Club BC in response to the Commission's April 20, 2016 letter [Exhibit A-28] inviting submissions on the review process for the Residential E-Plus rate design (Rate Schedule 1105).

1. BCSEA-SCBC do not intend to file intervener evidence regarding Residential E-Plus.
2. BCSEA-SCBC do not require BC Hydro to provide a witness(es) for cross-examination on BC Hydro's evidence regarding Residential E-Plus in the Application and BC Hydro's responses to information requests.
3. If the EPLUS Homeowners Group, or any other intervener, files evidence regarding Residential E-Plus then BCSEA-SCBC would be content with an opportunity to make written information requests in accordance with the existing Regulatory Timetable. BCSEA-SCBC do not foresee requiring an opportunity for oral cross-examination of an intervener witness regarding intervener evidence on Residential E-Plus.
4. It is noted that BC Hydro can choose to file rebuttal evidence in response to intervener evidence on Residential E-Plus. In the Commission's usual practice, rebuttal evidence is tested by oral cross-examination rather than by (written) information requests. Not knowing at the present time what might be the content of such future rebuttal evidence, BCSEA-SCBC are not in a position to waive their opportunity to test it. However, BCSEA-SCBC take no position at the present time on whether the testing of Residential E-Plus rebuttal evidence (if there is any) should be done by cross-examination or by information requests.
5. Echoing AMPC's comment in Exhibit C12-9, at this point in the proceeding the key factor in determining the review process for the Residential E-Plus rate design will be to know if an intervener intends to file evidence on the topic.

Yours truly,

William J. Andrews

A handwritten signature in black ink, appearing to be 'WJ Andrews', with a horizontal line extending to the right from the bottom of the signature.

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