

**Tom A. Loski**

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July 7, 2016

Ms. Laurel Ross
Acting Commission Secretary
British Columbia Utilities Commission
Sixth Floor – 900 Howe Street
Vancouver, BC V6Z 2N3

Dear Ms. Ross:

**RE: Project No. 3698781
British Columbia Utilities Commission (BCUC or Commission)
British Columbia Hydro and Power Authority (BC Hydro)
2015 Rate Design Application (2015 RDA)
Compliance with Exhibit A-33**

BC Hydro writes in regard to the 2015 RDA and further to the Commission's June 30, 2016 letter (Exhibit A-33) seeking submissions from parties on the review process for the Commercial Energy Consumers Association of British Columbia's (CEC) proposal to establish a non-firm interruptible rate pilot for Medium and Large General Service customers (Exhibit C1-10). The Commission outlined three process options they would like submissions on. BC Hydro's response is as follows:

1. BC Hydro does not believe a procedural conference is required to discuss process and procedures for the review of CEC's proposal for the reason noted below;
- 2a. BC Hydro is of the view that a written process is the most efficient way to address process and procedures for the review of CEC's proposal and that those submissions could be filed by July 15, 2016 or soon thereafter; and
- 2b. BC Hydro does not believe that submissions on the review process should be brought forward on the first day of the oral hearing as it can adequately be addressed through a written process. This will ensure that valuable time is not used for process-related issues that have been identified and can reasonably be dealt with outside of the oral hearing.

BC Hydro will provide its comments on the review process for CEC's proposal in the appropriate venue but notes at a high level that the timelines provided by CEC (as referenced in the Commission's June 30, 2016 correspondence) are unworkable given BC Hydro's resourcing with respect to preparation for the Rate Design Application oral hearing beginning on August 16, 2016. More importantly, BC Hydro is concerned that

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Page 2 of 2

the compressed timelines do not provide for adequate stakeholder engagement which is key to the success of any pilot, such as the one CEC proposes.

For further information, please contact Gordon Doyle at 604-623-3815 or by email at bchydroregulatorygroup@bchydro.com.

Yours sincerely,



(for) Tom Loski
Chief Regulatory Officer

jc/ma

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