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**VIA COMMISSION E-FILING SYSTEM**

British Columbia Utilities Commission  
6th Floor – 900 Howe Street  
Vancouver, BC V6Z 2V3

**Attention:** Laurel Ross, Acting Commission Secretary

Dear Madam:

**Re: British Columbia Hydro and Power Authority (BC Hydro)  
Project No. 3698781/G-156-15  
2015 Rate Design Application Module 1 (RDA)  
Association of Major Power Customers (AMPC) Comments on Commercial  
Energy Consumers Association of British Columbia's (CEC) Proposed  
Interruptible Rate**

We are legal counsel to AMPC in this matter, and write in response to the Commission's letter of June 30, 2016, seeking comments on further process relating to CEC's proposed interruptible rate.

The Commission's June 30 letter requested submissions on the following:

- 1) Is there a need for a procedural conference to discuss process and procedures for the review of CEC's evidence? If so, do parties agree with CEC's proposed date or do parties have alternative proposed dates?*
- 2) For parties who consider that a procedural conference is not required, please comment if: (a) written submissions on the review process is preferred, and if so, the timing of filing written submissions or in the alternative (b) whether the submissions on the review process should be brought forward on the first day of the oral hearing scheduled for August 16, 2016.*

AMPC's views are as follows:

- CEC's proposed interruptible rate should be dealt with as intervener evidence in the normal course, subject to potential BC Hydro engagement comments, or

intervener requests for leave to file evidence responding to CEC's proposed rate (that presumably would already have been made). At this stage there is no reason to treat this evidence differently than the evidence filed by other interveners, and parties should be prepared to cross-examine CEC on its proposed rate at the oral hearing. There appears to be insufficient time between now and the oral hearing for sufficient engagement between BC Hydro, CEC and other stakeholders to design a specific rate to be tested at the oral hearing beyond what CEC has filed in evidence to date.

- A streamlined review process (SRP) is inappropriate in the circumstances. Again subject to any BC Hydro comments about potential engagement, the pending oral hearing appears to be the appropriate forum. The Commission's SRP guidelines are clear that the SRP process is to be used to address "a limited number of issues brought forward by regulated entities", which CEC's proposal is not. Further, SRPs are to be used for non-contentious matters, according to the Commission's guidelines, and AMPC does not expect that there is sufficient time available between now and August to make that the case. Unanticipated significant progress would be required between BC Hydro and CEC in designing a rate, assuming BC Hydro is amenable and assuming no other rate class representatives object.
- No procedural conference is required, and addressing the issue on the first day of the oral hearing leaves the matter too late, in the circumstances. Process should be determined in writing now, given the issues to be addressed are straightforward and there is sufficient time to deal with it now so that parties are aware of process in advance of the hearing.
- If the current hearing schedule proves not to provide adequate opportunity to address this evidence, for whatever reason, more hearing time should be added. To avoid schedule conflicts during the summer period, when many parties are travelling, it would be AMPC's preference that the Commission add further oral hearing time in subsequent weeks.

In summary, there is no need for a procedural conference, written submissions can manage appropriate further process, and, subject to BC Hydro comments about its ability to engage with CEC, CEC's evidence should be dealt with as intervener evidence in the normal course at the oral hearing. That approach is efficient and procedurally fair, by providing parties with notice of the case they have to meet and adequate time to prepare their cases.

Please contact the undersigned if you have any questions.

Yours truly,

Bull, Houser & Tupper LLP



per: Matthew D. Keen

MDK/dnm