

## ALLEVATO QUAIL &amp; WORTH

BARRISTERS AND SOLICITORS

Susanna Allevato Quail Law Corporation  
Rachel Roy Law CorporationAllevato & Quail Law Corporation  
Leigha L. Worth Law Corporation

July 7, 2016

Our File 15-070  
Leigha Worth  
Direct: 604-424-8634  
[lworth@aqwlaw.ca](mailto:lworth@aqwlaw.ca)British Columbia Utilities Commission  
Sixth Floor, 900 Howe Street, Box 250  
Vancouver, BC V6Z 2N3**Attention: Ms. Laurel Ross, Acting Commission Secretary****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 (COPE 378) in response to the Commission's June 30, 2016 request for submissions responding to the Commercial Energy Consumers' (CEC) suggestions regarding the review process for its proposal to establish a non-firm interruptible rate pilot for medium and large general service customers.

Parties were asked to provide submissions on the following questions:

- 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?*

In MoveUP's view, there is no need for a procedural conference but the Union recognizes that issues may arise as a result of intervenor submissions that may trigger the need for such a process. As it now stands, the Union submits that there is no need to discuss process in a more comprehensive manner than allowed for in these written submissions.

- 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,*

The Union prefers written submissions regarding the appropriate review process and it supports the short timeframe suggested by Mr. Andrews: July 14, 2016. This timing is, in the Union's view appropriate to the subject matter as well as the desire to set this matter down for review in a timely manner without subjecting participants to an onerous timeline.

*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.*

The Union does not see a need to take time during what will be a hearing focusing on some complex issues to address the appropriate process to review CEC's proposed Rate Pilot.

The Union has not yet had the opportunity to formulate a position on CEC's proposal so its position on this matter or the position it will eventually take on the appropriate process and timing are in no way rooted in its support or lack thereof for this proposed Rate Pilot. In addition, the undersigned has reviewed Mr. Andrews' submission on behalf of the British Columbia Sustainable Energy Association and Sierra Club BC and the Union adopts the points listed in the contextual section of that submission.

ALL OF WHICH IS RESPECTFULLY SUBMITTED

Yours truly,

*Original on File Signed by:*

Leigha Worth  
Barrister & Solicitor