

WEISBERG LAW
C O R P O R A T I O N

2730 Ailsa Crescent
North Vancouver BC V7K 2B2
Reply to: Fred J. Weisberg
Telephone:(604) 980-4069
Email: fredweislaw@gmail.com

VIA EMAIL

July 7, 2016

Ms. Laurel Ross Acting Commission Secretary
British Columbia Utilities Commission
6th Floor 900 Howe Street
Vancouver, BC V6Z 2N3

Dear Ms. Ross:

**RE: BC Hydro and Power Authority
2015 Rate Design Application
Project No. 3698781
Non-Integrated Areas Ratepayers Group
Submissions re: Commercial Energy Consumers Proposal
for a Non-firm Interruptible Rate Pilot for Medium and Large
General Service Customers**

We are writing on behalf of our clients, the Heiltsuk Tribal Council, Shearwater Marine Limited and the Gitga'at First Nation, collectively intervening as the Non-Integrated Areas Ratepayers Group ("NIARG"), further to the Commission's June 30, 2016 letter (Exhibit A-33) seeking parties' submissions regarding a 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).

Regarding the three process options identified by the Commission, NIARG submits the following:

1. NIARG submits that a procedural conference is not required to discuss process and procedures for the review of CEC's non-firm interruptible rate pilot proposal, as discussed further below;

Letter to BC Utilities Commission
Non-Integrated Areas Ratepayers Group
Proposed Non-firm Interruptible Rate Pilot
July 7, 2016

2(a). NIARG submits that a written process would be 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

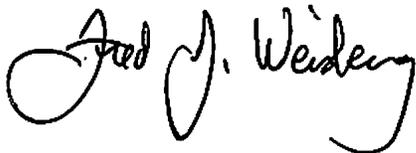
2(b). NIARG agrees with BC Hydro that submissions on the review process should not be brought forward on the first day of the oral hearing as those concerns can adequately be addressed through a written process. That approach would enable the Commission to determine and/or narrow the process-related issues that have been identified by parties, and if necessary, invite submissions on any remaining issues at the outset of the oral hearing.

NIARG is concerned that in light of the summer vacation months and necessary preparation for the 2015 RDA oral hearing, the one month period proposed by CEC for Stakeholder Consultation on the Pilot seems insufficient.

NIARG shares BCSEA-SCBC's concerns that interveners have not yet had the benefit of BC Hydro's substantive input on CEC's proposal, and that target implementation of the pilot in time for the Winter of 2016-2017 may leave insufficient time for a proper review process.

Lastly, NIARG notes that ZoneIIRPG has identified circumstances that would seem to make the proposed non-firm interruptible rate pilot best suited for review as part of the RDA Module 2.

Yours truly,

A handwritten signature in black ink that reads "Fred J. Weisberg". The signature is written in a cursive, flowing style.

Fred J. Weisberg
Barrister & Solicitor
Weisberg Law Corporation
Counsel to the Non-Integrated Areas Ratepayers Group