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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) Submission on Review  
Process for Commercial Energy Consumers Association of British  
Columbia's (CEC) Proposed Interruptible Rate**

We are legal counsel to AMPC in this matter, and we write in response to the Commission's letter of July 11, 2016, seeking submissions on the appropriate review process for CEC's proposed interruptible rate.

AMPC's July 7 letter did so, and AMPC continues to rely on it.<sup>1</sup> In short, as matters stand, CEC's proposed rate should be dealt with as intervener evidence in the normal course for the following reasons:

- There is insufficient time between now and the oral hearing for adequate engagement between BC Hydro, CEC and other stakeholders to design a new specific rate to be tested at the oral hearing. Introducing a new rate at the oral hearing in the circumstances would be procedurally unfair.
- A streamlined review process is inappropriate in the circumstances because they are not consistent with the Commission's guidelines.

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<sup>1</sup> Exhibit C12-12.

- If the current hearing schedule does not provide adequate opportunity to address this evidence, more hearing time should be added, but after the current hearing timing.

Please contact the undersigned if you have any questions.

Yours truly,

Bull, Houser & Tupper LLP



per: Matthew D. Keen

MDK/dnm