

July 18, 2016

VIA E-FILING

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



Reply to: Sarah Khan
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Ph: 604-687-4134

Our file: 7615

Dear Ms. Ross:

**Re: BC Hydro 2015 Rate Design Application Module 1
BCOAPO response to Commission letter of July 11, 2016 regarding the
Commercial Energy Consumers (CEC) proposal for a non-firm interruptible
rate pilot for medium and large general service customers**

We write to provide the submission of BCOAPO in response to the Commission's letter of July 11, 2016 (Exhibit A-35) regarding the process for review of the CEC's proposal for a non-firm interruptible rate pilot for medium and large general service customers.

BCOAPO submits that the review process proposed by the CEC is premature and that the rate pilot proposal would be more appropriately addressed as part of Module 2 of BC Hydro's 2015 RDA so that the proposed rate can be properly evaluated. In its letter of today's date (Exhibit B-35), BC Hydro has set out (at p. 2) a proposed alternate timetable for consultation and review of the rate pilot, and BCOAPO supports this timetable.

Alternatively, should the Commission decide that the CEC's evidence about the rate pilot has been filed as intervenor evidence and should be treated like any other intervenor evidence, we will be prepared to cross-examine the CEC on its proposal at the oral hearing and make final submissions about the evidence.

Sincerely,
BC PUBLIC INTEREST ADVOCACY CENTRE

Sarah Khan
Barrister and Solicitor