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British Columbia
Utilities Commission

Letter of Comment

In accordance with the Commission's Rules of Practice and Procedure, to submit a letter of comment concerning an application currently before the Commission, please provide a completed form to commission.secretary@bcuc.com. If email is unavailable, please mail the form to the address above. By doing so, you acknowledge that all letters of comment are published with the author's name as part of the public evidentiary record, both in print copy and on the Commission's website. All personal contact information provided on this page is removed before posting to the website. Forms must be received by the Commission by the last filing date included in the proceeding's regulatory timetable before final arguments.

Proceeding name

Are you currently registered as an intervener or interested party?

Name (first and last)

City Province

Email Phone number

Letter of Comment

Name (first and last)

Ed Bruning

Date:

November 20, 2016

Comment: Please specify the reasons for your interest in the proceeding, your views concerning the proceeding, any relevant information that supports or explains your views, the conclusion you support and any recommendations. The Commission may disallow comments that do not comply with the Rules of Practice and Procedure.

November 20, 2016

BCUC

RE: Application (Order G-142-16)

I read in a recent newsletter that ICBC is proposing a 4.9% rate increase and is arguing that it should not supply supportive evidence that the proposed increase is adequate and necessary. I am not very familiar with the proposal other than to say that the argument they are presenting is in direct contradiction to the purposes of your organization --look after the interests of the public --which means that rate increase proposals must pass scrutiny with supportive evidence before they can be evaluated and supported. The argument that the public will be confused and will not respond in its best interest is fallacious given the fact that a number of citizens are indeed quite capable of understanding the evidence if it is accurate and well presented. Turning the argument around a bit would be akin to me telling the bank that, in my application for a loan, I should not present evidence for the loan request because my life is complicated and loan officers would not comprehend what lies in store for me down the road. What do you think the response from the bank would be?

If you accept their argument and allow the proposal without supportive evidence, then I would say the Commission is abrogating its duties and succumbing to the interests of the regulated, in this instance the provincial government. It may be true that ICBC requires a rate increase; however, it is their duty to make the strongest, most compelling case for such an increase if the Commission's purpose is to rule in the public's best interest. If the evidence cannot support the proposed rate increase, then the request should be denied.

I hope your process stays true to the organization's mandate and reject ICBC's defense for not presenting supportive evidence for the requested rate increase.

Thanks for your attention.

Ed Bruning

BC