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British Columbia Utilities Commission
Sixth Floor, 900 Howe Street, Box 250
Vancouver, BC, V6Z 2N3
Attn: Laurel Ross, Acting Commission Secretary and Director
By Web Posting

Dear Madam:

Re: BC Hydro F2017-F2019 Revenue Requirements Application,
BCUC Project No. 3698869
BC Sustainable Energy Association and Sierra Club BC comment on process

In its letter of December 2, 2016, the Commission confirmed its requirement that parties provide written submissions on: "...whether some or all of the issues should be heard by way of an oral hearing, including sufficient specific detail on the focus and scope of any oral component."¹ These are BCSEA-SCBC's submissions.

BCSEA-SCBC's primary, though not exclusive, focus in this proceeding is on the DSM expenditure schedule. In Order G-144-16, the Commission panel confirmed that the DSM component will be heard with the rest of the RRA application as part of a single proceeding.²

At the November 28, 2016 procedural conference, BCSEA-SCBC said that "at this point in time an oral hearing regarding the DSM expenditure schedule would be in order."³ BCSEA-SCBC have now had the opportunity to fully review BC Hydro's responses to the first round of information requests from BCSEA-SCBC and other interveners as well as from Commission staff, and to prepare BCSEA-SCBC's second round of information requests for BC Hydro. BCSEA-SCBC are now of the view that an oral hearing for cross-examination of BC Hydro witnesses on the DSM issues will not be required.

While respectfully reserving the right to take a different approach when the time comes, BCSEA-SCBC continue to intend to file expert evidence on DSM in accordance with the regulatory timetable approved in Order G-144-16 (i.e., by February 3, 2017). The timetable provides opportunities for the Commission and parties to make information requests on intervener evidence (by February 17, 2017) and for the intervener to respond (by March 3, 2017). Further, the timetable provides for BC Hydro to file rebuttal evidence if any (by March 10, 2017). Two points arise.

First, if the Commission determines that there is a need for an opportunity to cross-examination on BCSEA-SCBC's DSM evidence then BCSEA-SCBC would make a witness available for cross-examination.

¹ Exhibit A-13.

² Exhibit A-7, Appendix A, p.3 of 6.

³ T7:356, lines 22-24.

Second, BCSEA-SCBC respectfully reserve the right to ask the Panel to allow an opportunity to test, whether by information requests or cross-examination, rebuttal evidence, if any, filed by BC Hydro in response to BCSEA-SCBC's DSM evidence.

Regarding whether an oral hearing, as distinct from a written process, is required concerning other issues (i.e., other than DSM), BCSEA-SCBC take no position. This approach does not imply that BCSEA-SCBC consider the other issues to be unimportant. Either a written process or an oral process can be the most effective, efficient and fair way to address an important issue, depending on the circumstances.

In summary, BCSEA-SCBC do not call for an oral hearing on DSM. They would provide a witness for cross-examination on their DSM evidence if required. They reserve the right to ask for an opportunity to test, by IRs or cross-examination, evidence if any filed by BC Hydro in response to BCSEA-SCBC's DSM evidence.

All the above is respectfully submitted.

Yours truly,

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