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August 14, 2017

VIA ELECTRONIC MAIL

British Columbia Utilities Commission
6th Floor, 900 Howe Street
Vancouver, B.C.
V6Z 2N3

Attention: Patrick Wruck, Commission Secretary and Manager, Regulatory Support

Dear Sirs/Mesdames:

Re: Creative Energy Vancouver Platforms Inc. – 2017 Long Term Resource Plan – Project No. 1598921 – Comments on Process

By letter dated August 1, 2017 (Exhibit-2), the British Columbia Utilities Commission (the "Commission") requested comments on process for review of the above-noted application.

The Commission notes in its August 1st letter, that "In Creative Energy's view, the Commission is not obligated to establish any process … Should the Commission still wish to initiate a process to review Creative Energy's LTRP submission, Creative Energy submits a streamlined review process would likely be most appropriate given the scale and nature of this utility and LTRP".

The CEC notes that while the utility is not a large utility, it has elected to undertake initiatives which pose significant rate risks to rate payers.

The CEC submits that there is a reasonable possibility there will be portions of this application which will be contentious, and as a result a streamlined revenue process may not be suitable. Page 5 of 8 of Order G-37-12, the Streamlined Review Process Guidelines, notes this criteria.

The CEC supports efficiency in regulatory process and does see value in a round table discussion on the LTRP in a streamlined review process type setting. Given the technical nature of the materials the CEC submits that a round of information requests should be provided prior to the SRP and that written submissions should be required at the end of the SRP.

The CEC notes that the Commissions comment on the importance of the Applicant's long term resource plan in its decision on the company's 2015 Revenue Requirements Application;

INTERLAW MEMBER OF INTERLAW, AN INTERNATIONAL ASSOCIATION OF INDEPENDENT LAW FIRMS IN MAJOR WORLD CENTRES

> "The Panel finds that the nature extent of the business transformation contemplated by Creative Energy in this point in the utilities history warrants the Commissions review of the steam utility LTRP in order to ensure that core steam utility customers continue to receive cost effective delivery of secure and reliable energy services." **The Panel determines that Creative Energy must file a long term resource plan pertaining to the existing steam utility no later than 2 years from the date of this Decision and prior to making an investment decision regarding any low carbon fuel switch that may impact the existing steam customers. The LTRP shall include information available from the fuel switch feasibility study.**

The comment highlights the importance of regulatory review of the LTRP to ratepayers.

Yours truly,

OWEN BIRD LAW CORPORATION

Christopher P. Weafer

CPW/jj
cc: CEC
cc: Creative Energy
cc: Registered Interveners