

Date Submitted: February 28, 2018

Proceeding name: Creative Energy 2018-2022 Revenue Requirements

Participant contact information

Organization or individual name: Commercial Energy Consumers Association of British Columbia (the "CEC")

City: Vancouver

Province: British Columbia

Email: dwcraig@allstream.net

Phone number: 604-568-4904

For organizations only - representative contact information

Name: Christopher P. Weafer

Organization (if different from above): Owen Bird Law Corporation

City: Vancouver

Province: British Columbia

Email: cweafer@owenbird.com

Phone number: 604-691-7557

Also representing (if applicable):

Additional information

Please state your reasons for intervening in this proceeding:

In this proceeding the CEC will be representing commercial customer interests in the application. As it has before, the CEC will be representing the interests of existing and future ratepayers. The CEC in its

representation of commercial interests does not consult with individual consumers because utilities are precluded from sharing customer information and it would be excessively expensive for the CEC to attempt representation at an individual customer level. To the extent that Creative Energy has say 200 buildings that it serves the CEC may be said to not represent any of the specific buildings individually. The CEC in its representation has in the past and will in the future consult with the Building Owners and Managers Association, Landlord BC and the BC Chamber of Commerce. These organization represent or may represent in the future all of the Creative Energy's Customers, which have or will have commercial sector business, institutional or non-profits organizations consuming and paying for the heat supplied by Creative Energy. So to this extent the CEC has a direct or indirect interest to represent 100% of the existing buildings Creative Energy may serve and 100% of the future buildings Creative Energy may serve, where a commercial interest may be established. To the extent that offices, hotels, public institutions and retail businesses in the downtown area are commercial consumers of energy supplied by Creative Energy the CEC would have an interest in representing the commercial perspective on Creative Energy's Revenue Requirements. At one level it might be said that residential condos are not represented by the CEC. However, given that any owner of a condo may at some time be renting their premises to a residential tenant they may logically fall within the ambit of the CEC's Landlord BC consultation. Additionally, given that any given residential condo owner may be engaged in running a business from their condo then they may fall within the ambit of the CEC's Chamber of Commerce consultation. The CEC notes that Creative Energy has a single Steam tariff under which it serves it customers. Therefore the CEC has a 100% interest in the rate proposals which Creative Energy may put to the Commission. Ultimately, the CEC represents the interests of those consumers of the Creative Energy services who want to ensure that Creative Energy's proposals are reviewed and challenged appropriately with regard to the degree to which they serve the interests of the consumers.

Please state how you are directly or sufficiently affected by the Commission's decision in this matter; or describe your experience, information, or expertise relevant to this matter that would contribute to the Commission's decision making:

The interests and rates of the CEC's members will be affected by this application and therefore, it is important that the CEC is represented in this proceeding in order to ensure that the members' interests are articulated and represented. The CEC's participation will also assist in ensuring that a balanced approach is considered by the Commission in reviewing Creative Energy's Application and that commercial class customer ratepayers' interests are considered. The CEC has been actively represented on a consistent basis before the Commission since 2003.

Please list the key issues you intend to address in the proceeding:

Appropriateness of proposed move from Cost of Service to Index Based Rates over short and long term. Appropriateness of proposed term for rates. Appropriateness of Creative Energy's assumptions. Appropriateness of Creative Energy's proposed changes to regulatory oversight. Appropriateness of Creative Energy's methodology for calculation of revenue requirements. Appropriateness of Creative Energy's proposed IBR mechanism and individual components. Appropriateness of the calculations relevant to the determination of rates. Appropriateness of Creative Energy's proposed increase in rates. Appropriateness of Creative Energy's proposed modification to deferral accounts. Appropriateness of Creative Energy's accounting policies and cost allocations. Adequacy of Creative Energy's documentation for its proposal. Lack of COS evidence for comparison to Creative Energy's IBR proposal All other elements of the application that may be of concern to commercial energy ratepayers.

For administrative purposes only

Do you intend to participate fully, including attendance at hearings and submission of evidence or information requests, if applicable?: Yes

Do you intend to request PACA funding? This does not impact your ability to participate: Yes

Have you or your organization web-registered as an intervener or interested party in the past 12 months?: Yes

If yes, please provide your username: