

William J. Andrews

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August 2, 2018

British Columbia Utilities Commission
Sixth Floor, 900 Howe Street, Box 250
Vancouver, BC, V6Z 2N3
Attn: Patrick Wruck, Commission Secretary
By Web Posting

Dear Sir:

Re: British Columbia Hydro and Power Authority Review of the Regulatory Oversight of
Capital Expenditures and Projects, Project No. 3698877
BC Sustainable Energy Association and Sierra Club BC,
Comments on summaries of proposed evidence

These are the comments of the interveners BCSEA and SCBC in response to the Commission's Order G-126-18 [Exhibit A-15] inviting submissions by August 2 from parties on any summaries of proposed evidence filed by July 26 by parties or BCUC staff.

By letter of July 26, 2018 [Exhibit A-16], BCUC staff propose to file evidence to be prepared by Deloitte. The evidence would review regulatory review and approval of capital expenditures and projects by energy regulators in Alberta, Washington State and Nova Scotia. Staff would be in a position to file the jurisdictional review evidence by September 10, 2018.

By letter of July 26, 2018 (Exhibit C3-4), the Commercial Energy Consumers propose to obtain and file evidence of one or more experts in management consulting to assist in identifying, developing and refining the information that the Commission should utilize in its assessment of BC Hydro Capital Expenditures and the appropriate places in the regulatory sphere for such information to be provided. CEC says the evidence will be limited to the development of BC Hydro's Capital Filing Guidelines. CEC does not provide an estimate of when it would be in a position to file the evidence.

In the reasons for Order G-126-18, the Panel notes on page 13 that "If the Panel determines that it is appropriate to allow participants to file evidence, the Panel will allow parties the opportunity for information requests related to this evidence."

BCSEA-SCBC support an amendment of the regulatory timetable to provide for the filing of evidence by September 10, 2018, followed by information requests on the evidence, and responses to the information requests. The jurisdictional review evidence proposed by staff would be relevant and material and would be worth the extra proceeding time to obtain. CEC should have the opportunity to file its proposed evidence, acknowledging that the content is not described in as much detail as the staff's proposed evidence.

All the above is respectfully submitted.

Yours truly,

William J. Andrews

A handwritten signature in black ink, appearing to be 'WJ Andrews', with a horizontal line extending from the end of the signature.

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