

August 2, 2018

VIA E-FILING

Patrick Wruck
Commission Secretary
BC Utilities Commission
6th Floor 900 Howe Street
Vancouver, BC V6Z 2N3



Reply to: Leigha Worth
lworth@bcpiac.com
Ph: 604-687-3034
Our File:7636

Dear Mr. Wruck:

Re: British Columbia Hydro and Power Authority – Review of the Regulatory Oversight of Capital Expenditures and Projects – Project No. 1598877

We are counsel for the BC Old Age Pensioners' Organization, Active Support Against Poverty, Council of Senior Citizens' Organizations of BC, Disability Alliance BC, Tenant Resource and Advisory Centre, and Together Against Poverty Society, known collectively in regulatory processes as "BCOAPO et al." The constituent groups of BCOAPO et al. represent the interests of low and fixed income energy consumers within BC and more specifically in this process, the interests of BC Hydro's low and fixed income residential ratepayers.

BCOAPO makes the following written comments on the proposed evidence of both the BCUC Staff and CEC in accordance with BCUC Order G-126-18.

BCUC Staff's Proposed Evidence

Counsel has reviewed the Staff proposal marked at Exhibit A-16 in this process including the retention of Deloitte, the three jurisdictions chosen, and the focus of the proposed report and BCOAPO sees significant value in the evidence this would put on the record in order to allow for the testing of BC Hydro's proposed approach with robust information based on the three other jurisdictions identified.

However, BCOAPO does ask the Commission to ensure that the role of the Staff is clear in this process and that it remains consistent with the role it has taken in the past: i.e. Commission Staff does not do more than engage the expert and manage the logistical aspects relating to the preparation of the report without giving the expert or experts instructions on the desired outcome. In our view, it is important that this report be consistent with past practice: i.e. that it is informational in nature without being rooted in any position that the Staff may individually or collectively hold regarding BC Hydro's Proposal. To be clear: there is no expectation that the staff intended this proposal to be anything other than what counsel has just described: rather, we feel it is important for the utility and the public to have the assurance that the Staff are merely facilitating this evidence rather than actively participating in shaping its outcome.

CEC's Proposed Evidence

BCOAPO has reviewed CEC's proposal and notes that CEC has explicitly acknowledged the decision of this Commission Panel on scope and it has indicated its intended evidence will be within the sphere of the originally contemplated scope of this hearing. Although CEC's proposal is not overly specific at this early stage that should not in our submission necessarily be a bar to

allowing them to proceed. The information provided certainly seems to be in scope and we note that CEC is a sophisticated player in the BC regulatory field that can certainly be counted on to work with all parties to ensure no unnecessarily duplicative, out of scope, or irrelevant work is taking place.

All of which is respectfully submitted,
Yours truly,

BC Public Interest Advocacy Centre

Original on file signed by:

Leigha Worth
Barrister & Solicitor
Executive Director