

6 June 2019

Via email

Mr. Patrick Wruck
Commission Secretary
BC Utilities Commission
Suite 410, 900 Howe Street
Vancouver, BC V6Z 2N3

Dear Mr. Wruck:

**Re: Creative Energy Vancouver Platforms Inc. (Creative Energy)
British Columbia Utilities Commission (BCUC, Commission)
Application for a Fuel Cost Adjustment Charge (FCAC) Rate Rider (Application)**

Creative Energy writes in reply to Exhibit A-5, by which Commission Panel requests participant comments on further process for review of the Application and the timing for such process.

In particular, the Commission Panel requests comment on whether:

- a. *An SRP (excluding oral arguments) is appropriate to further develop the evidentiary record;*
 - i. *If an SRP is desired, whether the scope of the SRP should be limited to particular topics and why;*
- b. *The proceeding should go directly to final written argument; or*
- c. *An alternate procedural process should be considered by the Panel (if so, please specify the proposed alternate procedural process).*

Creative Energy submits that a quite limited set of issues arise from the Application and that the nature of the issues makes them well-suited to discovery through information requests. The essential facts and circumstances regarding the basis for and the merits of our proposals are set out in our Application and have been well-elaborated on the record through our responses to two rounds of information requests.

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In our view, the information request process has produced a well-developed and extensive evidentiary record sufficient for parties to prepare arguments on the merits and reasonableness of Creative Energy's Application and related proposals. Creative Energy therefore submits that it would be most efficient for the proceeding to proceed directly to final written argument.

Creative Energy respectfully submits that the substantive matters at issue as identified through the information requests are amply addressed on the evidentiary record such that an SRP would likely provide limited additional evidence or context to justify the additional time and resources required to support such a process.

Creative Energy proposes a schedule for written argument as set out below, assuming a procedural order is received during the week of June 10, 2019 and allowing for 2 weeks between the respective filing dates, in sequence. Creative Energy would be supportive of the Commission Panel setting out any specific questions that it seeks to ensure parties address in written argument.

Item	Date
Creative Energy Written Argument	June 27, 2019
Intervener Written Argument	July 12, 2019
Creative Energy Reply Argument	July 26, 2019

For further information, please contact the undersigned.

Yours sincerely,



Rob Gorter
Director, Regulatory Affairs and Customer Relations

cc: Registered Interveners