

**Fred James**

Chief Regulatory Officer

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July 17, 2019

Mr. Patrick Wruck  
Commission Secretary and Manager  
Regulatory Support  
British Columbia Utilities Commission  
Suite 410, 900 Howe Street  
Vancouver, BC V6Z 2N3

Dear Mr. Wruck:

**RE: Project No. 1598969**  
**British Columbia Utilities Commission (BCUC or Commission)**  
**British Columbia Hydro and Power Authority (BC Hydro)**  
**Electricity Purchase Agreement (EPA) Renewals – Sechelt Creek Hydro,**  
**Brown Lake Hydro, and Walden North Hydro**

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BC Hydro writes to respond to the BCUC's letter dated July 12, 2019 requesting BC Hydro and registered interveners to make submissions on whether they object or support the BCUC allowing the letter of comment filed by the Clean Energy Association of British Columbia (**CEBC**) to be included in evidence to this proceeding, and the reasons why. The BCUC also asked if parties require the opportunity to file any supplemental argument to address any new issues raised in the CEBC letter of comment.

**The letter of comment should be placed on the proceeding record**

BC Hydro appreciates the CEBC expressing its support for the three EPA renewals by submitting a letter of comment in this proceeding. In the normal course, letters of comment should be filed by the date specified under Rule 8.08 of the BCUC's Rules of Practice and Procedure:

“Letters of comment must be received by the BCUC by the last date included in the proceeding's regulatory timetable before final arguments, unless the BCUC directs otherwise. Letters of comment that are received late will not be considered by the BCUC in the proceeding.”

Filing a letter of comment by the deadline under Rule 8.08 provides parties to the proceeding with the opportunity to consider those comments when preparing final arguments.

Although Rule 8.08 provides for the BCUC not to consider letters of comment that are received late, in this case the CEBC letter has been viewed by the parties and it appears that it has also been viewed by the BCUC Panel. Therefore, BC Hydro believes the best course of action is to place the CEBC letter on the record as an “E” Exhibit and provide the parties with the opportunity to address the CEBC’s comments in argument.

BC Hydro notes that it does not agree with certain of the factual assertions in the CEBC’s letter, specifically those related to BC Hydro’s electricity imports from the United States. These points are not particularly relevant to this proceeding and we believe that it would be reasonable to address the issue in our reply argument.

### **Proposed regulatory timetable**

This proceeding has been a long one, beginning with the filing of the three EPA renewals on May 31, 2018. BC Hydro prefers to complete this proceeding apace and in recognition of parties’ holiday plans this summer.

We believe that interveners should not need much time to consider the CEBC letter and finalize their final arguments. Intervenors would have been putting the final touches on their final arguments on Friday July 9<sup>th</sup> when the proceeding was suspended to consider only the matter of the CEBC letter. As noted above, BC Hydro would be satisfied to address the CEBC letter in our reply argument.

Accordingly, BC Hydro proposes the following regulatory timetable to complete this proceeding.

<b>Action</b>	<b>Date (2019)</b>
BCUC posts CEBC letter as an “E” Exhibit	Monday, July 22
Intervener Final Arguments	Wednesday, July 24
BC Hydro Reply Argument	Wednesday, July 31

For further information, please contact Geoff Higgins at 604-623-4121 or by email at [bchydroregulatorygroup@bchydro.com](mailto:bchydroregulatorygroup@bchydro.com).

Yours sincerely,



Fred James  
Chief Regulatory Officer