

Date Submitted: July 15, 2019

Proceeding name: BCUC Indigenous Utilities Regulation Inquiry

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 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:

The CEC represents the interests of ratepayers consuming energy under commercial tariffs. The CEC anticipates that the BCUC decision-making with regard to indigenous utilities regulation could significantly impact indigenous people's costs and benefits with regard to commercial supply and/or demand and potentially impact the future revenue requirements. The commercial sector interests in conservation and efficiency and in the development of supply side resources are

paramount in this proceeding. Impacts on revenue requirements will affect commercial energy consumers. The CEC has specific requests from commercial customers having direct interests in these potential issues and considers it essential to apply for standing and fully participate in this proceeding.

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 the inquiry 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:

The CEC will participate in all aspects of the proceeding, including: 1. definition of a public utility 2. characteristics of an 'indigenous utility' with regard to ownership and operation; types of services provided; for whom the services are provided; geographic areas served by the utility 3. if Indigenous utilities should be regulated and if so, how; and if not, how should indigenous utility ratepayers be protected 4. how would regulation alter in the event of an ownership transfer, if at all 5. any other matters arising of importance to commercial 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: CECBC