BCUC Indigenous Utilities Regulation Inquiry Ехнівіт C18-3

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August 12, 2019

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VIA ELECTRONIC MAIL

Ms. Robin Phillips JFK Law Corporation 816 - 1175 Douglas Street Victoria, BC V8W 2E1 rphillips@jfklaw.ca dnordquist@alib.ca

Dear Ms. Phillips:

British Columbia Utilities Commission – Indigenous Utilities Regulation Inquiry – Re: **Project No. 1598998**

We are counsel to the Commercial Energy Consumers Association of British Columbia (the "CEC"). Attached please find the CEC's first set of Information Requests on written evidence to Adams Lake Indian Band with respect to the above-noted matter.

If you have any questions regarding the foregoing, please do not hesitate to contact the undersigned.

Yours truly,

OWEN BIRD LAW CORPORATION

Christopher P. Weafer CPW/jj

cc: CEC cc: BCUC

cc: Registered Interveners

COMMERCIAL ENERGY CONSUMERS ASSOCIATION OF BRITISH COLUMBIA ("CEC")

Intervener Information Request No. 1 to Adams Lake Indian Band on Written Evidence

British Columbia Utilities Commission Indigenous Utilities Regulation Project No. 1598998

August 12, 2019

1. Reference: Exhibit C14-2 page 6 and 7

To the extent that an Indigenous utility provides services within its community, logically it should not be considered a public utility, in the same way a municipal or regional district utility is not considered a public utility under the UCA. Where an

Indigenous utility will provide utility services beyond its lands, it should maintain its jurisdiction over its services to promote fairness and consistency among ratepayers in a region. In addition, an Indigenous utility may prove better situated to provide utility services to certain communities due to factors such as local geography. This in turn, may result in fewer costs associated with the development of new infrastructure, as ratepayers may be able to avail themselves of a proximate Indigenous utility system.

1.1. Please provide a brief overview of how an indigenous utility operating outside its community can provide ratepayer protection.