

D Barry Kirkham, QC⁺
Duncan J Manson⁺
Daniel W Burnett, QC⁺
Ronald G Paton⁺
Karen S Thompson⁺
Laura A Wright
James H McBeath⁺
Scott H Stephens⁺
David W P Moriarty
Katharina R Spotzl
Patrick J Weafer

Robin C Macfarlane⁺
Alan A Frydenlund, QC⁺ *
Harvey S Delaney⁺
Paul J Brown⁺
Gary M Yaffe⁺
Harley J Harris⁺
Kari F Richardson⁺
James W Zaitsoff⁺
Daniel H Coles⁺ *
Sameer Kamboj
Georgia Barnard

Josephine M Nadel, QC⁺
Allison R Kuchta⁺
James L Carpick⁺
Patrick J Haberl⁺
Heather E Maconachie
Jonathan L Williams⁺
Paul A Brackstone⁺ *
Pamela E Sheppard⁺
Jocelyn M Bellerud⁺
Brian Y K Cheng^{**}
Lucky D Johal

James D Burns⁺
Jeffrey B Lightfoot⁺
Christopher P Weafer⁺
Gregory J Tucker, QC⁺ **
Terence W Yu⁺
Michael F Robson⁺
Barbara E Janzen
George J Roper⁺
Tony R Anderson
Steffi M Boyce

Rose-Mary L Basham, QC, Associate Counsel⁺
Jennifer M Williams, Associate Counsel⁺
Hon Walter S Owen, OC, QC, LLD (1981)
John I Bird, QC (2005)

* Law Corporation
* Also of the Yukon Bar
** Also of the Alberta Bar
*** Also of the Ontario Bar
** Also of the Washington Bar

OWEN BIRD

LAW CORPORATION

PO Box 49130
Three Bentall Centre
2900-595 Burrard Street
Vancouver, BC
Canada V7X 1J5

Telephone 604 688-0401
Fax 604 688-2827
Website www.owenbird.com

Direct Line: 604 691-7557
Direct Fax: 604 632-4482
E-mail: cweafer@owenbird.com
Our File: 23841/0205

August 14, 2019

VIA ELECTRONIC MAIL

British Columbia Utilities Commission
6th Floor, 900 Howe Street
Vancouver, B.C. V6Z 2N3

**Attention: Patrick Wruck, Commission Secretary
and Manager, Regulatory Support**

Dear Sirs/Mesdames:

**Re: British Columbia Hydro and Power Authority (“BC Hydro”) F2020 to F2021
Revenue Requirements Application ~ Project No. 1598990
Request for Comments on Proposed Regulatory Timetable Exhibit A-10**

We are counsel to the Commercial Energy Consumers Association of British Columbia (the “CEC”). We are writing in response to Exhibit A-10 which seeks Intervener comments on whether they support moving the Procedural Conference to November 22, 2019 (afternoon), or maintaining the current established date of December 19, 2019 (morning).

The CEC can be available for either date proposed.

The CEC recognizes BC Hydro’s desire to have sufficient lead time to prepare panels for the oral hearing scheduled to start January 20, 2020. The CEC supports efforts to achieve regulatory efficiency and effectiveness. That said, the BC Hydro interests must be weighed against fairness to Interveners who will be assessing the appropriate topics for the oral hearing up to and after closing of the written evidentiary record. This assessment will include a review of issues which may be raised by Intervener written evidence.

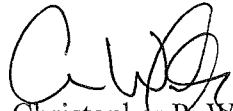
Whether the Commission adopts November 22nd, a date before Intervener evidence is filed, or December 19th, the CEC’s position will be that the Commission should maintain a level of flexibility in the Procedural Conference process step such that Interveners are not forced to refine too detailed an approach to scope. This is an important application. Where Interveners identify concerns around topics, upon which there is an evidentiary base in the proceeding, the Commission should err on the side of ensuring that BC Hydro has a panel available to speak to the topic at the oral hearing to ensure the application can be properly tested. The CEC submits

the earlier the date of the Procedural Conference, the more flexibility the Commission should provide.

All of which is respectfully submitted.

Yours truly,

OWEN BIRD LAW CORPORATION



Christopher P. Weafer

CPW/jj

cc: CEC

cc: BC Hydro

cc: Registered Interveners