

August 19, 2019

VIA E-FILING

Patrick Wruck
Commission Secretary
BC Utilities Commission
6th Floor 900 Howe Street
Vancouver, BC V6Z 2N3



Reply to: Leigha Worth
ED@bcpiac.org
Ph: 604-687-3034
Our File: 7500.120

Dear Mr. Wruck,

**Re: British Columbia Hydro and Power Authority F2020 to F2021 Revenue Requirements Application ~ Project No. 1598990
BCOAPO's Comments on Proposed Regulatory Timetable**

We represent the BC Old Age Pensioners' Organization, Active Support Against Poverty, Council of Senior Citizens' Organizations of BC, Disability Alliance BC, Tenant Resource and Advisory Centre, and Together Against Poverty Society, known collectively in regulatory processes as "BCOAPO et al." ("BCOAPO").

We are writing in response to the BCUC letter dated August 2, 2019 (Exhibit A-10) which invited interveners and the BC Hydro to indicate whether they support moving the second procedural conference to November 22, 2019 (afternoon) or maintaining the current established date of December 19, 2019 (morning). BC Hydro proposed to advance the date of the second procedural conference, due to the limited time between the scheduled procedural conference and the start of the oral hearing on January 20, 2020 (Exhibit B-9).

BCOAPO can be available for either date proposed, and defers to the BCUC to make the decision on this.

However, BCOAPO, similarly to the CEC, submits that BC Hydro's interests must be balanced against fairness to the Interveners who intend to file evidence, and to the Interveners who will be assessing topics that should be scoped into the oral hearing.

The second procedural conference is intended to address the scope of the oral component of the proceeding. The November 22nd date would be preceding the date for filing Intervener Evidence. BC Hydro in its letter dated July 26, 2019 (Exhibit B-9) states that it "is of the view that intervener evidence would likely be within the scope of the oral phase of a hearing". However, if on November 22nd the Commission will establish "a detailed issues list" for the oral hearing as requested by BC Hydro (Exhibit B-8, p.6), it is possible that Intervener Evidence filed after the conference will fall outside of this "detailed list". At the same time, Interveners Evidence could

potentially reveal additional information which would post-factum change the parties' position on the scope of oral hearing.

A possible solution for the concerns outlined above is to provide to the Interveners more flexibility in identifying topics for the oral hearing, if the Commission adopts November 22nd as the procedural conference date, as suggested by the CEC (Exhibit C9-5).

All of which is respectfully submitted.

Sincerely,
BC PUBLIC INTEREST ADVOCACY CENTRE

Original on file signed by:

Leigha Worth
Executive Director | General Counsel