

August 30, 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: 7500.620

Dear Mr. Wruck,

**Re: British Columbia Hydro and Power Authority Application to Amend Net Metering Service under Rate Schedule 1289 ~ Project No. 1599004
BCOAPO Submissions on Further Process**

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 provide this submission in accordance with the regulatory timetable established by Commission Order G-185-19 (Exhibit A-7). We are responding to the questions put forth by the Commission's letter of July 23, 2019 (Exhibit A-6), as noted below:

1. Whether it is your intention to file intervener evidence and if so, please describe the nature of the evidence and what specific matters it relates to.

BCOAPO does not intend to file evidence in this proceeding.

2. Whether the review of the Application should proceed by a written or oral public hearing, or some other process. If proposing an oral public hearing, what specific matters should be addressed through that process and why it is preferred to address those matters orally?

At this time, we do not see any need for an oral proceeding. We feel that a written process should suffice because all issues could be adequately explored and explained during the interrogatory process.

3. Steps and timetable associated with the recommended regulatory review process.

BCOAPO suggests a process which would include one additional round of Information Requests, written final arguments and the Utility's reply. We are of the view that a second round of questions is required to obtain any clarifications or elaborations necessary with respect to the first-round interrogatory responses. BCOAPO submits that it will be able to accommodate filing of the proposed second round of Information Requests at least two weeks after the issuance of the BCUC's order establishing a further process.

We have reviewed the BC Hydro scheduling proposal (Exhibit B-6, page 2) and generally support steps proposed for Scenario 2 if no intervener intends to file evidence, or Scenario 4 if other interveners intend to file evidence. In our view, under both above-mentioned scenarios, BC Hydro proposed reasonable timetables for the second round of Information Requests and final arguments. However, we would like to point out that November 14, 2019 as a date for Information Requests on intervener evidence proposed under Scenario 4 might be insufficient. Considering that November 11th is Remembrance Day and a statutory holiday, parties will have less than a week to review evidence.

4. Any other matters that will assist the Panel to efficiently review the Application.

At this time, BCOAPO has nothing further to add.

All of which is respectfully submitted.

Sincerely,
BC PUBLIC INTEREST ADVOCACY CENTRE

Original on file signed by
Leigha Worth

Executive Director | General Counsel

Original on file signed by

Irina Mis
Barrister & Solicitor