

October 23, 2019

Sent by eFile

British Columbia Utilities Commission
Suite 410, 900 Howe St.
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Attention: Patrick Wruck, Commission Secretary

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Our reference 1000385863

Dear Sir:

BC Hydro F2020 – F2021 Revenue Requirements Application (RRA) – Association of Major Power Customers of BC (AMPC) – Information Request (“IR”) Response Deadlines

We are legal counsel to AMPC in this matter and write to raise a concern with the procedural schedule. AMPC respectfully requests that the Commission modify the intervener IR response deadline, currently scheduled for Friday, January 10, 2020,¹ so that some of AMPC’s anticipated IRs from BC Hydro may be responded to by Monday, January 13.

A principal author of AMPC’s intended expert evidence has a longstanding, previously booked vacation over the holiday period (from December 16 – January 7). The location is overseas and has limited internet access. The deadline for IRs to interveners to be filed is December 17, 2019. The current schedule would only afford AMPC two or three days to seek the author’s input on certain IR responses.

To mitigate the overlap between the holiday period and the intervener IR response period, AMPC requests that:

- the Commission allow AMPC to respond to IRs until January 13, if necessary, and
- provide BC Hydro until January 17 instead of January 15 to file AMPC-related rebuttal evidence.

BC Hydro has agreed to accommodate AMPC’s proposed schedule changes for AMPC only, with AMPC’s agreement that it will file any responses not impacted by its expert’s availability on the original date (January 10), and adjusting the rebuttal evidence deadline to January 17 to the extent the rebuttal evidence relates to AMPC.

BC Hydro has also confirmed that it will file its AMPC-related rebuttal evidence before January 17 if it determines that none of AMPC’s delayed IR responses interferes with completing the AMPC-related rebuttal evidence and BC Hydro is able to complete the rebuttal evidence before January 17.

¹ The current process schedule was set by the Commission in Order G-218-19, reflected in Exhibit A-13.

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This extension is necessary to ensure AMPC can plan its participation and fully participate in the hearing process. Subject to the conditions outlined above BC Hydro does not object, and the little if any prejudice to any other parties is warranted in the circumstances. The extension is likely to improve the quality of the intervener side evidentiary record before the Commission and should therefore be granted.

Please contact the writer if you have any questions.

Yours very truly,



Matthew D. Keen

MDK/roe

c. Matthew Ghikas, Fasken