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Our File: 23841/0205

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November 14, 2019

VIA ELECTRONIC MAIL

British Columbia Utilities Commission  
6<sup>th</sup> 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 – Amended Regulatory  
Timetable Pursuant to Order G-279-19**

We are counsel to the Commercial Energy Consumers Association of British Columbia (the “CEC”). We are responding to BC Hydro’s letter of November 8, 2019 letter requesting an extension to the response of Information Requests on the Cost of Energy Evidentiary Update (Exhibit B-11), and the 20-Year Load Forecast (Exhibit B-15), as well as the letter from the British Columbia Utilities Commission (the “Commission”) dated November 13, 2019, enclosing Order G-279-19 (Exhibit A-21).

BC Hydro requested a direction from the Commission that BC Hydro is not obligated to respond to 34 information requests which it deems to be out of scope. These are identified in Attachment “A” to its letter.

In particular, BC Hydro argues that the load forecast was prepared as an interim step and that fiscal 2022 to fiscal 2039 information is provided for information purposes only. It had previously suggested that Information Requests on the June 2019 Load Forecasts be focused on the test period of the application (fiscal 2020 and fiscal 2021). BC Hydro believes that some of the information requests are better reserved for the next IRP proceeding.

The CEC notes that one of CEC’s Information Requests is identified in that Attachment (CEC 4.8.1).

The CEC’s question asked BC Hydro to describe the methodologies BC Hydro used to inflate the load growth beyond the test period.

The CEC accepts that the information addresses the period beyond the test period, but submits that it is appropriate to understand context and trend information in assessing the test period forecast.

Load forecasting for utilities is by nature a long-term exercise and examining a segment, for a single, very short period, can potentially be misleading. It is useful to know if the two-year test period represents an anomaly in the future trends or if it is consistent with long-term expectations.

The validity of the long-term trends are thus also important to understand. If the load forecast going into the future appears to be unreasonably established in either direction, it calls into question the validity of the test period forecast.

The CEC requests that the Commission deny BC Hydro's request with regard to the CEC Information Request and direct BC Hydro to respond to the Information Request according to the timetable deemed appropriate by the Commission.

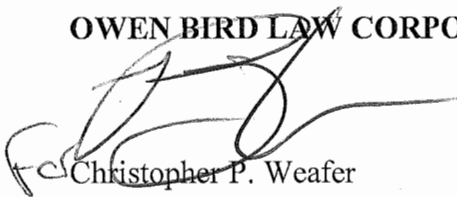
The CEC has also reviewed the letter of November 12, 2019, from Mr. David Ince requesting that BC Hydro be directed to respond to the Information Requests from him, and has considered the information requests are deemed to be out of scope by BC Hydro.

The CEC does not consider Mr. Ince's Information Requests to be out of scope and supports his position.

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: BC Hydro

cc: Registered Interveners