



## BY ELECTRONIC SUBMISSION

January 16, 2020

Mr. Patrick Wruck  
Commission Secretary  
British Columbia Utilities Commission  
Suite 410, 900 Howe Street  
Vancouver, BC V6Z 2N3

Dear Mr. Wruck:

**Re: Project No. 1599027  
British Columbia Utilities Commission (BCUC or Commission)  
An Inquiry into the Regulation of Municipal Energy Utilities (Inquiry)  
City of Abbotsford (Abbotsford)  
Written Submission on Further Process**

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Abbotsford writes in response to [BCUC Order No. G-316-19 \(Order\)](#) seeking intervener submissions on the Inquiry regulatory process. In particular, participants have been asked to comment on the proposed regulatory timetable set out as Appendix B to the Order and on the appropriate further process.

In accordance with Rule 10.03 of the BCUC Rules of Practice and Procedure, Abbotsford has coordinated with other interveners who represent substantially similar interests and has had the benefit of reviewing in draft form the City of Richmond's (**Richmond**) and Metro Vancouver Regional District's (**MVRD**) submissions on further process.

Based on the material currently before the BCUC in the way of written submissions provided by Inquiry participants, and in the absence of a specific proposal to which to respond -- as would ordinarily be the case in an application proceeding -- Abbotsford respectfully submits that the most efficient and reasonable manner of resolving the issues in the Inquiry would be for the Commission to provide guidance as to its preliminary views or concerns on the scope of the municipal exclusion in light of submissions to date. In this regard, Abbotsford agrees with MVRD's anticipated request that the Commission provide, as the next step in the inquiry, additional guidance in the form of further scoping questions.

This could additionally be achieved through BCUC IRs to interveners according to Richmond's anticipated timetable proposal. Whether this guidance takes the form of additional scoping questions or BCUC information requests (**IRs**) to interveners, it would likely avoid the unnecessary expense and delay of amassing and reviewing evidence that is ultimately irrelevant to the issues to be resolved in the Inquiry or non-responsive to the BCUC's concerns.

In any event, Abbotsford agrees with Richmond's anticipated proposal that BCUC IRs to interveners, and intervener responses to BCUC IRs, precede the deadline for filing intervener evidence. If further evidence is filed in light of the additional scoping questions, or BCUC IRs to interveners and the intervener responses to BCUC IRs, such that a further round of IRs is

warranted, Abbotsford respectfully submits that this ought to be addressed in future submissions regarding “further process”.

Abbotsford does not currently have any dates of unavailability.

For further information, please contact the undersigned.

Yours truly,



Aniz Alani  
Director, Property, Risk Management and Legal Services