

Suite 1600 Cathedral Place
925 West Georgia Street
Vancouver, BC
Canada V6C 3L2
T: 604.685.3456

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

Ian Webb
D: 604.631.9117
F: 604.694.2932
iwebb@lawsonlundell.com

Dear Mr. Wruck:

**Re: British Columbia Utilities Commission – An Inquiry into the Regulation of
Municipal Energy Utilities – Project No. 1599027 – Submission on Further Process**

We are counsel for Metro Vancouver in the Inquiry into the Regulation of Municipal Energy Utilities (**Inquiry**). We write further to British Columbia Utilities Commission (**Commission**) Order G-316-19, in which the Commission requested that interveners in the Inquiry provide written submissions on further process. Specifically, the Commission requested that interveners provide comments on the proposed regulatory timetable attached as Appendix B to Order G-316-19, present proposals for the regulatory timetable, advise the Commission of any periods of unavailability, and indicate whether they intend to file intervener evidence.

Metro Vancouver is a registered intervener in the Inquiry and provides its comments on each of these points below.

Further process and the proposed regulatory timetable

Metro Vancouver has reviewed the proposed regulatory timetable in Appendix B of Order G-316-19. While Metro Vancouver agrees that the submission of intervener evidence, issuance of Commission and intervener IRs, and responses to such IRs are each appropriate for inclusion in the Commission's final regulatory timetable, Metro Vancouver submits that the first step should be the Commission issuing additional scope questions in a manner similar to that done by the Commission in the Indigenous Utilities Regulation Inquiry.¹

The Indigenous Utilities Regulation Inquiry began in March 2019 with relatively broad terms of reference set out in an Order in Council (**OIC**) by the Lieutenant Governor in Council.² In May 2019, two months prior to the submission of written evidence by participants, the Commission issued additional scope questions, within the scope of the OIC's terms of reference, intended to be helpful for participants to consider in preparing their evidence and submissions.

¹ Ex. A-5 in the Indigenous Utilities Regulation Inquiry – Project No. 1508998.

² Order in Council No. 108 dated March 11, 2019.

Similarly, this Inquiry was established with relatively broad initial terms of reference as set out in Order G-177-19 by the Commission Chair. Participants filed their initial written submission for the Inquiry in October 2019, and Metro Vancouver believes that it would similarly be helpful in this Inquiry if the Commission provides additional guidance at this time for participants to consider in preparing their evidence and submissions. Such guidance would allow participants to focus their evidence and written submissions, leading to a more efficient and issue responsive process.

Metro Vancouver takes no other position on the action items or proposed dates in the regulatory timetable proposed by the Commission, other than to request that sufficient time be provided between action item deadlines to ensure that interveners have adequate time to prepare.

After completion of the regulatory timetable action items, Metro Vancouver suggests that the further process for the Inquiry could follow a simplified version of the process used in the Indigenous Utilities Regulation Inquiry, as follows (on a reasonable timetable to be determined by the Commission):

- Interveners submit final written submissions
- Commission issues draft report for comment
- Intervener comments on draft report
- Commission issues final report

Periods of unavailability

Metro Vancouver staff and counsel participating in this Inquiry do not have any significant periods of unavailability, however, we note that spring break for many of the school districts in the lower mainland spans the last two weeks of March 2020.

Intention to file evidence

Metro Vancouver anticipates filing intervener evidence.

Yours very truly,

LAWSON LUNDELL LLP



Ian Webb
IDW/ns1

cc. Rina Thakar, Senior Legal Counsel, Legal Services, Metro Vancouver
Jeff Carmichael, Division Manager, Utility Research and Innovation, Metro Vancouver