

13 February 2020

Via E-filing

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

Dear Mr. Wruck:

**Re: British Columbia Utilities Commission (BCUC, Commission)  
Review of Thermal Energy Systems Regulatory Framework Guidelines - Project No. 1599043  
Creative Energy Vancouver Platforms Inc. (Creative Energy)  
Submission on Draft Terms of Reference**

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Creative Energy writes to submit its comments on the draft Terms of Reference in the matter of the Commission's Review of Thermal Energy Systems (**TES**) Regulatory Framework Guidelines (**Guidelines**), in accordance with the public hearing process established under Order G-341-19.

Creative Energy owns and operates both Stream A and Stream B regulated public utilities in BC and a partnership affiliated with Creative Energy - Creative Energy Developments LP - pursues new TES projects that may in the future be established as regulated public utilities in BC. Creative Energy welcomes the Commission's Review of the TES Guidelines and it looks forward to actively participating and contributing to the substantive basis that will inform the Commission's review.

Creative Energy will address key matters related to the extent, form and efficiency of the Commission's regulation of thermal energy systems; including, for example, as relating to the definitions, principles, characteristics and methods for determining applicable exemptions and the means to prescribe and review the requirements and form of TES project approvals and rate setting.

In Creative Energy's view, the draft Terms of Reference properly set out and do not unnecessarily limit the level of inquiry required to inform and establish a fulsome record into all potential issues that may be raised by intervenors into the application of the TES Guidelines. Creative Energy considers that the draft Terms of Reference give appropriate regard to all material aspects of the TES Guidelines and that the scope the Commission's review will be properly informed on that basis. Accordingly, Creative Energy does not propose any amendments to the draft Terms of Reference.

CREATIVE ENERGY VANCOUVER  
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Creative Energy notes further that the Commission has not identified nor pre-judged what it expects will be the outcome of this Review. Creative Energy considers that to be appropriate as it expects that the submissions of intervenors later in this process will necessarily assist the Commission to define the outcome of this Review in due course.

For further information, please contact the undersigned.

Sincerely,

A handwritten signature in black ink, appearing to be 'R. Gorter', with a long horizontal flourish extending to the right.

Rob Gorter  
Director, Regulatory Affairs and Customer Relations