



Barristers & Solicitors / Patent & Trade-mark Agents

Norton Rose Fulbright Canada LLP  
1800 - 510 West Georgia Street  
Vancouver, BC V6B 0M3 CANADA

F: +1 604.641.4949  
[nortonrosefulbright.com](http://nortonrosefulbright.com)

**Matthew D. Keen**  
+1 604.641.4913  
[matthew.keen@nortonrosefulbright.com](mailto:matthew.keen@nortonrosefulbright.com)

March 12, 2020

**By Electronic Filing**

British Columbia Utilities Commission  
Suite 410, 900 Howe Street  
Vancouver, BC V6Z 2N3

**Attention: Patrick Wruck, Commission Secretary**

Dear Mr. Wruck:

**BC Hydro Transmission Service Market Reference-Priced Rates Application  
Association of Major Power Customers of BC (AMPC)  
Streamlined Review Process (SRP) Hearing Attendance due to COVID-19**

We are legal counsel to AMPC in this matter, and write on its behalf to request that the Commission postpone the SRP. At the outset, we note that the Alberta Utilities Commission has responded to COVID-19 by taking two steps: (i) deferring all public events and proceedings, and (ii) committing to *explore* remote participation options to proceed with a hearing “should there be an essential economic requirement” to do so.<sup>1</sup> [emphasis added]

Multiple AMPC members have recently implemented corporate policies to support the public health response to COVID-19 that, in some cases, will not permit AMPC member representatives to attend the SRP on March 17.

This hearing is important to AMPC members, which include many of BC Hydro’s largest customers that would be affected most by the rates proposed. Many of these same members participated in the three year Freshet Rate pilot, in addition to BC Hydro’s consultation and workshops associated with BC Hydro’s development of the rates in this Application. If the SRP proceeds as scheduled, AMPC members will not have the opportunity to fully participate in the most significant procedural step to assess the Application.

Current videoconference options provide a less effective means of participation, particularly in (unavoidable) short notice circumstances. This is in part due to the inherent limitations of viewing remotely — speaker demeanor is not as apparent, and subtleties in communication are more easily missed. Of larger concern are the collaborative limitations that would result from multiple AMPC representatives having to participate remotely from different sites. At present, AMPC’s representatives would be unable to confer with counsel and each other effectively in real time.

For these reasons, it would be preferable to have an in-person proceeding, which AMPC members hope will be possible when the situation with COVID-19 is more settled. AMPC therefore requests that the Commission suspend the SRP and assess what format and timing options are available in several weeks’ time.

If you have any questions, please contact the writer.

Yours very truly,

For Matthew D. Keen

<sup>1</sup> <http://www.auc.ab.ca/News/2020/Bulletin%202020-06.pdf>.

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