

18 June 2020

VIA E-FILING

Marija Tresoglavic
Acting Commission Secretary
BC Utilities Commission
6th Floor 900 Howe Street
Vancouver, BC V6Z 2N3



Reply to: Leigha Worth
ED@bcpiac.org
Ph: 604-687-3034
Our File: 7100.910

Dear Ms. Tresoglavic,

**Re: Creative Energy Disposition of the Pendrell Street Thermal Energy System
Application
BCOAPO Submission on Further Process**

We represent the BC Old Age Pensioners' Organization, Active Support Against Poverty, Council of Senior Citizens' Organizations of BC, Disability Alliance BC, and Tenant Resource and Advisory Centre, known collectively as "BCOAPO et al." ("BCOAPO"). The constituent groups of BCOAPO et al. represent the interests of residential energy consumers in British Columbia.

We provide this submission in accordance with the regulatory timetable established by Commission Order G-112-20 (Exhibit A-2) for submissions on further process in this proceeding.

The public hearing for this process established by the same order G-112-20 included one round of Information Requests from the BCUC, an opportunity for customers and tenants served by the Pendrell Street TES to submit letters of comment, and submissions on further process.

To date, the record has included only one letter of comment filed by Commercial Energy Consumers (CEC) on June 11, 2020 (Exhibit E-1). The CEC indicated that its interest in this proceeding is "to ensure that the transfer of a utility to a different organization properly carries appropriate capital costs and liabilities, and appropriately deals with operating costs and relative to other affiliated companies, which may support this new organization, such that rates and service remain fair and appropriate for all parties". The CEC further stated that this proceeding "may be amenable to a short streamlined review with a few clarifying questions provided to the applicant in advance."

BCOAPO has a strong interest in this proceeding to ensure that the approvals sought in this application serve the public interest, and do not detrimentally affect the utility and its residential customers.

To provide the CEC and BCOAPO a proper means to examine the issues arising from this application, BCOAPO suggests a process which would include an opportunity to register as interveners and an opportunity for interveners to participate in the discovery, either in the form of written information requests or a streamlined review process.

ALL OF WHICH IS RESPECTFULLY SUBMITTED:

Original on file signed by:

Leigha Worth, Executive Director

BC Public Interest Advocacy Centre

Irina Mis, Staff Lawyer

BC Public Interest Advocacy Centre