



City of
Richmond

6911 No. 3 Road
Richmond, BC V6Y 2C1
www.richmond.ca

July 8, 2020
File: 99-LAW/2020-Vol 01

Law
Telephone: 604-247-4636
Fax: 604-276-4037
email: acapuccinelloiraci@richmond.ca

By Electronic Filing

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

Attention: Marija Tresoglavic, Acting Commission Secretary

Dear Ms. Tresoglavic:

**Re: British Columbia Utilities Commission (“BCUC”)
An Inquiry into the Regulation of Municipal Energy Utilities
Order Number G-177-19
Submissions on Further Process**

As the BCUC’s letter of June 22, 2020 (Exhibit A-10) correctly points out:

- (i) the Inquiry was adjourned until further notice due to the global COVID-19 pandemic and the state of emergency declared in British Columbia;
- (ii) it is uncertain when the state of emergency will be lifted, and the COVID-19 pandemic will have a challenging and lasting impact for the foreseeable future; and
- (iii) the BCUC understands that resources are currently constrained and that such circumstances may hinder the ability to participate effectively in the Inquiry at this time.

As acknowledged by the BCUC, the City of Richmond’s resources are constrained and the circumstances described by the BCUC would hinder the ability of both the City of Richmond and its wholly owned corporation, Lulu Island Energy Company Ltd. (“LIEC”), to participate effectively in this Inquiry at this time.

The BCUC is undoubtedly aware that the City of Richmond and other municipalities and regional districts are faced with dramatically shrinking revenues and at the same time have been called upon by both the federal and provincial governments to provide essential services and to play a key role

in the combined senior and local government efforts to deal with the spread and impact of COVID-19.

At this time, the City of Richmond, as an absolute priority, is focussing its efforts on delivering essential services and re-establishing the many interrupted services in a safe and staged manner in coordination with the provincial government and in compliance with all public health, regulatory and legislative orders, guidelines, advisories, guidance documents, notices and requirements. While doing this, the City of Richmond is continuing its expanded role as ordered by the provincial government under the *Emergency Program Act*, the numerous Ministerial Orders and as set out in the British Columbia Coordination Pandemic Plan.

In light of this current situation, it would be unfair to the City of Richmond, to LIEC, and to other municipalities and regional districts if the BCUC were to force this Inquiry on as proposed in Exhibit A-10. To do so would not be in the public interest.

Instead, the City of Richmond and LIEC respectfully submit that any consideration of a resumption of this Inquiry and a proposed regulatory timetable be deferred until 2021 and that submissions be invited at that time.

Yours truly,



Anthony Capuccinello Iraci
City Solicitor and Senior Director, Legal and Legislative Services
ACI:aci