



LAW DEPARTMENT

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July 9, 2020

By Electronic Submission

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 (the “Proceeding”)
Submissions on Further Process by letter of June 22, 2020**

The City of Vancouver is writing in response to BCUC's letter of June 22, 2020 (Exhibit A-10) requesting comments on the restart of the Proceeding.

We respectfully request that BCUC seek comments on the timing of the Proceeding restart no earlier than 2021 for the following reasons:

1. restarting this fall is not in the public interest because it will divert City staff and financial resources, which are already stretched, away from the essential services we provide to the public,
2. City staff are stretched because a significant drop in revenues due to the COVID19 pandemic has forced the City to lay-off and furlough many staff; with fewer staff, we need all hands on deck to maintain the many essential services that the public count on even more at this precarious time,
3. given that flu season usually starts in the fall, and health experts believe this could trigger or exacerbate a second wave of the pandemic, the strain on City resources could get worse,
4. we understand many local and regional governments across the Province, including those that are participating in the Proceeding, face similar challenges,

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5. the participation by local and regional governments is essential to the Proceeding but under these circumstances it is difficult for us to devote the attention that it deserves,
6. we remain committed to helping inform the Proceeding but, for the stated reasons, we do not believe it is in the public interest to restart it in the fall of 2020, and
7. while it is difficult to know when is the right time to restart the Proceeding, we believe it will become clearer in 2021 when more information about the impact of the pandemic, and the path to recovery, will be known.

In light of the above, we fully support the submissions made by the City of Richmond and the City of Burnaby on July 8, 2020, as well as the submission made by Metro Vancouver on July 9, 2020.

Sincerely,
City of Vancouver



David K.S. Li
Legal Counsel

CC: Sadhu Johnston, City Manager
Paul Mochrie, Deputy City Manager