

Subject: Request to Intervene

Date Submitted: July 10, 2020

Proceeding name: BC Hydro 2020 Transfer Pricing Agreement Application

Participant contact information

Organization or individual name: Association of Major Power Customers of British Columbia

City: Vancouver

Province: British Columbia

Email: jody.shimkus@kirkenvironmental.ca

Phone number: 604-641-4913

For organizations only - representative contact information

Name: Matthew D. Keen

Organization (if different from above): Norton Rose Fulbright Canada LLP

City: Vancouver

Province: British Columbia

Email: matthew.keen@nortonrosefulbright.com

Phone number: 604-641-4913

Also representing (if applicable):

Additional information

Please state your reasons for intervening in this proceeding:

This proceeding has significant long-term implications for the respective roles and responsibilities of BC Hydro and Powerex, the export of surplus electricity and the import of electricity to meet deficits. All of these issues affect the ability of BC Hydro and Powerex to generate income, which has a direct effect on BC Hydro's rates and customers.

Please state how you are directly or sufficiently affected by the Commission's decision in this matter; or describe your experience, information, or expertise relevant to this matter that would contribute to the Commission's decision making:

AMPC represents many of the BC Hydro's largest industrial customers. AMPC members purchase large volumes of electricity, and electricity is often a large cost input for members' operations. They will be directly affected by this proceeding because this Application has significant long-term implications for BC Hydro and Powerex's roles and responsibilities and ability to generate income, which has a direct effect on BC Hydro's rates and customers. AMPC has been an intervener in many proceedings before the BC Utilities Commission on BC Hydro-related matters, including most recently BC Hydro's Powerex 2019 Letter Agreement proceeding (which involved another energy supply contract and raised Powerex electricity purchase issues and considerations for ratepayers and the public interest) and BC Hydro's F2020-F2021 Revenue Requirement (which examined Powerex net income, as well as rates and ratepayer issues). AMPC is also participating in the BC Government's Phase 2 Review of BC Hydro which is exploring ways for BC Hydro to expand its businesses interests outside of BC via Powerex or a new subsidiary.

Please list the key issues you intend to address in the proceeding:

AMPC intends to observe and may seek additional information on how the new TPA supports greater opportunities for BC Hydro and Powerex to generate income and the TPA's potential effects and risks to ratepayers.

For administrative purposes only

Do you intend to participate fully, including attendance at hearings and submission of evidence or information requests, if applicable?: Yes

Do you intend to request PACA funding? This does not impact your ability to participate: Yes

Have you or your organization web-registered as an intervener or interested party in the past 12 months?: Yes

If yes, please provide your username: [REDACTED]