

16 July 2020

**VIA E-FILING**

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



Reply to: Leigha Worth  
lworth@bcpiac.com  
Ph: 604-687-3034  
Our File: 7500.312

Dear Ms. Tresoglavic,

**Re: British Columbia Hydro and Power Authority – 2020 Transfer Pricing Agreement  
Application – Project No. 1599102  
BCOAPO Submission on Further Process**

Please be advised that we continue to represent the residential ratepayer group known in BC Hydro regulatory processes as BCOAPO or BCOAPO et al. In our capacity as counsel for these groups, we make the following submissions on further process in regards to the above-noted regulatory process in compliance with the timetable set out by this Commission Panel in its Order G-156-20.

We have reviewed the BCUC Staff's letter and we fully support their suggestion that there be a workshop ahead of any IR's: we too view this as a means by which we might be able to reduce the amount of time spent generating and answering clarification questions as well as, provided the results of inquiries are included on the evidentiary record, some discovery. Their list of suggested topics is thorough, and we see all of those topics as having significant value.

Because it has been so long since the last Transfer Pricing Application – it predates our organization's most senior regulatory practitioner's tenure at BCPIAC by three years – an overview highlighting the differences between the existing and proposed Agreements would be very helpful as well. Our Expert, Mr. Harper has also indicated that, while these specific items may be covered in the topics identified by the Staff, he too would like to ask that BC Hydro highlight any changes. For example, he would like to see BC Hydro identify those provisions that have been removed with an explanation as to why they were removed, a list of those that have been changed and why, and finally, a list of any additions with an explanation as to why they were added to the existing Agreement's provisions.

Sincerely,  
**BC PUBLIC INTEREST ADVOCACY CENTRE**

*Original on file signed by*

Leigha Worth  
Executive Director | General Counsel