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August 11, 2020

British Columbia Utilities Commission
Suite 410, 900 Howe Street
Vancouver, BC Canada V6Z 2N3
attention: Patrick Wruck, Commission Secretary*filed online*

Dear Mr. Wruck:

**Re: British Columbia Hydro and Power Authority F2020 to F2021 Revenue Requirements Application ~ Project No. 1598990
Exhibit A-37 – Request for Comments**

These are the comments of the Movement of United Professionals (MoveUP) in response to the Commission's request in Exhibit A-37, regarding the timing of subsequent BC Hydro revenue requirements applications.

MoveUP is in broad agreement with the observations offered by BC Hydro in Exhibit B-59. Aside from all other factors, the exceptional range of uncertainty and the burdens faced by Hydro arising in these early stages of the COVID-19-generated global economic crisis need to be reflected in the timing and format of those proceedings. The Commission and interveners need to recognize that a full-blown and definitive review of Hydro's operational, capital and financial plans and prospects is unlikely to be a realistic expectation in this context.

Accordingly, our client endorses the propositions set out at page 3 of Exhibit B-59, as follows:

- the BCUC including in its decision an acknowledgement that the fiscal 2022 RRA to be filed by BC Hydro will need to be less detailed than the Application filed in the current proceeding, with a focus on what has changed;

- an efficient process for the fiscal 2022 RRA with fewer procedural steps (akin to the FortisBC Annual Review process or, potentially a Negotiated Settlement Process or Streamlined Review Process), occurring over a compressed time period, with a focused scoping order to ensure that this type of process [is] feasible; and
- the BCUC refraining from issuing a recommendation on the timing of an application for rates in fiscal 2023 and beyond until the timeline for the review of the fiscal 2022 application has been established.

In particular, MoveUP agrees with BC Hydro's suggestion that the next revenue requirements proceeding should be summary in character with a focus on "incremental requirements, relative to what the BCUC will have just finished reviewing in the current proceeding, for specific items that will be outlined in the application." We also urge the Commission to provide scoping directions reflecting the provisional character of the proceeding, and to project reluctance to permit participants to stray "pout of bounds" without a compelling argument that additional matters cannot be adequately addressed in the following regulatory cycle, when a more comprehensive review should be achievable.

MoveUP is highly skeptical about the appropriateness of an effort to adapt performance-based ratemaking to fit BC Hydro and continues to participate fully in the current process to review that possibility. That being said, our client supports BC Hydro's comments in Exhibit B-59 regarding the timing of any process to establish a base year for PBR, including ensuring that sufficient time is available for thorough consultations and other necessary elements of that undertaking.

All of which is respectfully submitted.

Yours very truly,

ALLEVATO QUAIL & ROY

A handwritten signature in blue ink, appearing to read "Jim Quail", written over a light blue rectangular background.

per **Jim Quail**
Barrister & Solicitor