

# William J. Andrews

## Barrister & Solicitor

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British Columbia Utilities Commission  
Sixth Floor, 900 Howe Street, Box 250  
Vancouver, BC, V6Z 2N3  
Attn: Marija Tresoglavic, Acting Commission Secretary  
By web posting

Dear Madam:

Re: British Columbia Hydro and Power Authority,  
F2020 to F2021 Revenue Requirements Application,  
BCUC Project No. 1598990  
B.C. Sustainable Energy Association Responses to Panel Questions in Exhibit A-37

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These are the intervener BCSEA's responses to the Panel's questions in Exhibit A-37. BCSEA acknowledges receipt of BC Hydro's July 24, 2020 response letter.<sup>1</sup> BCSEA has also had the benefit of reviewing Mr. McCandless's August 10, 2020 response letter,<sup>2</sup> and Move-Up's August 11, 2020 response letter.<sup>3</sup>

1. BCSEA agrees with the Panel's premise that it is not optimal to have BC Hydro's revenue requirements applications timed so that a decision by the Commission comes late in the test period.<sup>4</sup>
2. BCSEA supports steps to realign the RRA process to provide effective, efficient and fair review of BC Hydro's RRAs earlier in the test period than would otherwise occur. In BCSEA's view, it should be acknowledged that there is a trade-off between advancing the timing of an RRA and increasing the currency and certainty of the contents of the RRA.
3. BCSEA supports the idea of BC Hydro filing an F2022 RRA in December 2020, with a view to a Commission decision coming earlier in the test year than would otherwise occur. In this scenario, BCSEA would see the F2022 RRA focusing primarily on important areas where BC Hydro is experiencing cost pressures.<sup>5</sup> This would be less detailed than the F2020-F2021 RRA, and would focus on what has changed.<sup>6</sup> Presumably, the F2022 RRA would also address topics highlighted in the Commission's decision on the F2020-F2021 RRA to the extent possible within the limited time available.
4. BCSEA accepts that the process for reviewing an F2022 RRA filed in December 2020 would be substantially less comprehensive and intensive than the review of the F2020-F2021 RRA.

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<sup>1</sup> Exhibit B-59.

<sup>2</sup> Exhibit C4-3, pp.1-4.

<sup>3</sup> Exhibit C1-9.

<sup>4</sup> Exhibit A-37, p.1.

<sup>5</sup> Exhibit B-59, p.2.

<sup>6</sup> Exhibit B-59, p.3.

However, BCSEA would not support going as far as modelling the process after the processes for FortisBC Energy Inc. and FortisBC Inc. annual reviews under their multi-year rates plan.

5. In BCSEA's view, the Commission's proceeding regarding BC Hydro's Performance Based Ratemaking (PBR) Report is the appropriate venue for selecting the base year in the event that a PBR framework is recommended for BC Hydro.

All the above is respectfully submitted.

Yours truly,

William J. Andrews

A handwritten signature in black ink, appearing to read 'W. J. Andrews', with a horizontal line extending to the right from the bottom of the signature.

Barrister & Solicitor