



Allevato Quail & Roy  
BARRISTERS AND SOLICITORS

AQR file no. 19-043  
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September 2, 2020

British Columbia Utilities Commission  
Suite 410, 900 Howe Street  
Vancouver, BC V6Z 2N3  
Attn: Marija Tresoglavic, Acting Commission Secretary

*filed online*

Dear Mesdames/Sirs:

**RE: British Columbia Utilities Commission (BCUC or Commission)  
British Columbia Hydro and Power Authority (BC Hydro)  
Long-Term Resource Plan  
BCUC Project No. 1599117**

This is the submission of MoveUP pursuant to Commission Order No. G-205-20. MoveUP agrees with the proposals advanced by BC Hydro in Exhibit B-2.

Our client is an active participant in the Technical Advisory Committee, which is accurately described in Exhibit B-2. The COVID-19 pandemic (and its attendant economic crisis) has made an extraordinarily complex and difficult resource planning cycle, which already must address the deepening climate crisis, even more beset with uncertainties.

We also agree with BCSEA's observation in Exhibit C-1-2 that the pending status of the Comprehensive Review Phase 2 Report fortifies the reasons not to compel an early filing of the LTRP.

BC Hydro cannot be faulted for the prolongation of its consultation and planning processes under all of these circumstances. Given the gravity of the challenges facing Hydro and its customers, we submit that "getting it right" is more important than getting it done soon.

While we share BCSEA's estimation of the importance of BC Hydro's low-carbon electrification strategy and planning, we do not agree that singling out this subject-matter for earlier exposition than the rest of the LTRP would be useful. Isolating this issue from its full context, including the projected load-resource balance, would undermine its

usefulness. Furthermore, electrification will certainly be a core issue in the Phase 2 Report, and will be heavily driven by government policy. The rationale for waiting a little while for the LTRP is particularly relevant to electrification.

There should be no rush to get some version or some portions of the plan out the door this autumn, a time-frame when it is widely appreciated that the course and intensity of the pandemic and economic crisis may become even more volatile and unpredictable. BC Hydro's proposed LTRP timing and interim filing processes make sense under the circumstances.

All of which is respectfully submitted.

Yours very truly,

**ALLEVATO QUAIL & ROY**

A handwritten signature in blue ink, appearing to read 'Jim Quail', written in a cursive style.

*per* **Jim Quail**  
Barrister & Solicitor