

October 5, 2020

Ms. Marija Tresoglavic  
Acting Commission Secretary and Manager,  
Regulatory Support  
British Columbia Utilities Commission  
Suite 410, 900 Howe Street  
Vancouver, BC  
V6Z 2N3

Dear Ms. Tresoglavic:

**RE: Project No. 1599117 British Columbia Utilities**  
**Re: British Columbia Utilities Commission ("Commission")**  
**British Columbia Hydro and Power Authority**  
**Long-Term Resource Plan ("LRTP")**

I agree with delaying the process on the Long-Term Resource Plan until after the Provincial election.

However, in general, BC Hydro is taking far too long to prepare a LRTP. I suggest that the Annual Plan, Three-Year Plan and Long-Term Resource Plan should be released at the same time every year. The three different time projections need to be tied together. BCH as part of their normal process prepare an annual plan and due to the size of their reservoirs, I believe that they also prepare a three-year plan; a Long Term Resource Plan should be prepared in conjunction with these plans.

If previous LTRPs are checked, I believe that it will be found that they are not that accurate. This is understandable because many unexpected changes can happen within a twenty-year period. But in the past, politics also had a significant impact on the long-term projections. Historically, growth in electricity demand was strongly tied to GDP expansion; this tie between the two has been broken. From a political perspective, government leaders can project strong GDP expansion without having to project the same type of growth in electricity use.

This gives BCH the freedom to make projections strictly from a technical perspective and from their actual observations. It makes sense to start from an annual perspective, expanding to three years and then to a long term or twenty-year projection. The short-term projections should be strongly connected to the long-term ones.

It is useful to also have the long-term projections prepared every year at the same time. This process allows BCH's planners to revise and up-date their plans annually and the public to make more informed comments on the projections.

Sincerely, Paul Willis  
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