

October 6, 2020
British Columbia Utilities Commission
Suite 410, 900 Howe Street,
Vancouver, BC, V6Z 2N3
Attn: Marija Tresoglavic, Acting Commission Secretary

Dear Madam:

**Re: British Columbia Hydro and Power Authority Long-Term Resource Plan Filing Date (2021 LTRP) - BCUC
Project No. 1599117**

This is in response to the Commission's invitation to provide submissions regarding BC Hydro's request to suspend proceedings of the LTRP filing date proceeding until 30 days after the government has been sworn-in and a Cabinet appointed.

I have reviewed BC Hydro's initial request (Exhibit B-4) and response to Exhibit A-5 (B5). BC Hydro indicates the intention to continue to move forward with the technical analysis during the election period, but will suspend engagement efforts until after the election, resulting in a delay of the draft Integrated Resource Plan ("IRP"). BC Hydro indicates that it will provide an updated estimate of the 2021 timeline after the government is elected, and intervenors will then have an opportunity to comment on the revised schedule.

Given the necessity for the government (current or new) to have substantial policy-related input into the IRP, this intervenor considers a delay unavoidable. It would be inefficient and wasteful for BC Hydro to issue IRP recommendations based on limited engagement, and potentially have to reverse course due to nascent government policy input.

As per my September 3, 2020 issuance (C8-2), I advised that the original IRP schedule was already tight. I also indicated that if an 'approved' IRP filing does not produce near-term consequences with respect to the approval and implementation of BC Hydro initiatives and expenditures, this intervenor encourages BC Hydro to produce an end-product that is not rushed. This intervenor stresses the importance of a well-developed product, as an implemented IRP will influence the energy future of the province for decades to come.

And to reiterate, for an IRP to be useful, it must include a full recognition of the primary and secondary effects of the current pandemic. It also must incorporate the outcome of the Clean Energy Act Amendment Act (Bill 17), and incorporate approved government legislation pertaining to electrification, DSM and climate change.

This intervenor respectfully recommends that the Commission suspend the proceedings as requested by BC Hydro.

Yours respectfully,



David Ince, P. Eng.