

October 6, 2020

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

Dear Mesdames/Sirs:

**Re: Project No. 1599117**  
**BC Hydro Long Term Resource Plan (LTRP) Filing**

As per Commission Letter dated October 1, 2020, please find herein below the submission of Ms. Gjoshe - participating in this proceeding as an independent intervener, representing unstructured interests of BC Hydro residential ratepayers at large.

All of which is respectfully submitted,

Ms. Edlira Gjoshe  
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236-788-5293

In its October 1<sup>st</sup>, 2020 Letter (Exhibit A-5), the Commission considers that further submissions are warranted on BC Hydro's request filed as Exhibit B-4 dated September 25<sup>th</sup>, 2020, in which:

“British Columbia Hydro and Power Authority (BC Hydro) advises that as a result of the provincial election campaign, it will be suspending efforts to promote engagement opportunities for the 2021 Integrated Resource Plan (2021 IRP) and will be re-scheduling consultation meetings until later this fall. BC Hydro requests that the British Columbia Utilities Commission (BCUC) suspend the proceeding for the Long-Term Resource Plan Filing Date until 30 days after the government has been sworn-in and a Cabinet has been appointed.”

Further, in response to the Commission's request in Exhibit A-5, for BC Hydro to:

- “Clarify whether as a result of the suspended engagement efforts, BC Hydro considers that the proposed filing date for the 2021 IRP of September 2021 is now in jeopardy; and
- File an updated estimate of the BC Hydro 2021 IRP Timeline, if the schedule has been affected. If the schedule remains the same, BC Hydro is requested to file a higher resolution version of the BC Hydro 2021 IRP Timeline filed as Attachment 1 to Exhibit B-2.”

BC Hydro filed Exhibit B-5, dated October 2<sup>nd</sup>, 2020 in which BC Hydro clarifies that:

“BC Hydro appreciates the BCUC's interest in receiving an updated estimate of the 2021 IRP timeline as soon as possible. Unfortunately, we feel that any estimate provided, without knowing the outcome of the election and any expectations a new government may have, would be speculative and unreliable. Accordingly, BC Hydro considers that the best way forward is for BC Hydro to submit an updated schedule after a government has been sworn-in and a Cabinet has been appointed. At that time, the BCUC could consider further submissions from interveners and determine whether BC Hydro's updated schedule is reasonable.”

Here are my comments on this matter:

First, it would appear that the suspension of BC Hydro's engagement efforts as it concerns the development of its 2021 IRP is unavoidable on account of the upcoming provincial election campaign.

Second, I would also suggest that from a regulatory process perspective, the postponement of BC Hydro's engagement efforts provides a further hurdle in what was already a “thin” line-of-sight to a BC Hydro 2021 IRP filing schedule, without certainty as to when a filing might actually materialize.

Third, the lack of a robust line-of-sight to an actual filing date for the BC Hydro 2021 IRP, appears even more “lacklustre” given the backdrop of a 12-year gap since the last regulatory filing of an LTRP by BC Hydro (i.e. BC Hydro’s 2008 Long Term Acquisition Plan - LTAP).

Under these circumstances, I respectfully urge the Commission to consider a staged process for the review of BC Hydro’s 2021 IRP, such that earlier filing and regulatory review of certain plan components is enabled.

In my previous submission on this matter dated September 3<sup>rd</sup>, 2020, I recommended that the Commission consider the merits of a staged approach to the filing of the 2021 BC Hydro IRP, such that the Load Forecast (or Load Forecast products thereof) which would inform the IRP Load/Resource Balance (LRB) are filed in advance of the remaining components of the IRP. A few other interveners including CEABC and CFN-GBI (as per their September 3, 2020 submissions), suggested similar approaches to the filing of the Load Forecast and/or provided additional commentary regarding BC Hydro’s duty to consult with respect to its load forecasts. I agree with their suggestions and commentary on this aspect of their submissions.

I have also had the benefit of reviewing Mr. Willis’ submission on this matter dated October 6, 2020, in which he posits that “Historically, growth in electricity demand was strongly tied to GDP expansion; this tie between the two has been broken.” Mr. Willis goes on to add: “This gives BCH the freedom to make projections strictly from a technical perspective (underscore added) and from their actual observations.”

In Exhibit B-5, BC Hydro submits that it “is continuing to move forward with the technical analysis required to develop the 2021 IRP”. It further suggests that “... unless BC Hydro’s planned engagement efforts are reduced, it will not be possible to meet a September 2021 filing date.”

I would suggest that the Commission explore the possibility of varying the sequence of the filing and/or of the regulatory review of the components to a “fully-cooked” BC Hydro 2021 IRP, so as to first enable review of certain components of the plan on a technical basis (where appropriate) and accordingly re-align the sequence of BC Hydro’s engagement obligations with regard to these components.

In addition to the suggested approach to the filing of the Load Forecast (and/or Load Forecast products) mentioned above, there maybe an opportunity to file early and first consider on a technical review basis- an update to the inventory of BC clean and renewable resources (such as wind, run-of-river, solar, etc. along with other resource options)- which will inform the BC Hydro 2021 IRP Resource Options considerations.

It's been 7 years since the 2013 IRP. More frequent updates to the provincial inventory of energy and capacity resources are warranted given technological progress alone- on account of study methodology improvements leading to renewed resource potential estimates and generation technology advances informing updated Unit Energy Cost (UEC) and Unit Capacity Cost (UCC) estimates. It is possible to consider an early review of the technical, financial, environmental and economic development attributes of these resource options using at-gate UEC's and UCC's updates.

Further, the regulatory process is able to accommodate the participation of qualified third parties (such as the BC Community Solar Coalition- an intervener in this proceeding) who have knowledge of and an interest in and/or who may wish to further inform BC Hydro's efforts related to a review from a technical perspective of these resource options.