

**Fred James**

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December 23, 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: British Columbia Utilities Commission (BCUC or Commission)
British Columbia Hydro and Power Authority (BC Hydro)
BCUC Inquiry into the Regulation of Safety (Inquiry)**

BC Hydro writes in response to the Commission's letter dated December 17, 2020,¹ in which it requests submissions from participants on whether the scope of the Inquiry should include the regulation of safety for the Insurance Corporation of British Columbia (ICBC).

BC Hydro submits that the scope of the Inquiry should not include the regulation of safety for ICBC. In BC Hydro's view, the focus of the Inquiry is, and should be, on safety regulation in the energy sector. That is what the Commission appears to have contemplated in Appendix B to Order G-241-20 in which it established the Inquiry.²

The Commission acknowledged that safety is a broad term comprising the categories of asset safety, worker safety, and public safety. That means the scope of the Inquiry, even if limited to public utilities, is already quite broad. In BC Hydro's view, it would be inefficient and would become unwieldy to broaden the scope of the Inquiry beyond the regulation of safety for public utilities.

BC Hydro also agrees with ICBC's submission³ that every section of the *Utilities Commission Act*⁴ that references safety has been made inapplicable to ICBC by

¹ Exhibit A-3.

² For example, see page 4 where the Commission states: "As a first step in the process, the BCUC is seeking input on safety regulation in the energy sector and the ways by which the BCUC can most effectively deliver on its safety mandate [emphasis added]."

³ Exhibit E-3.

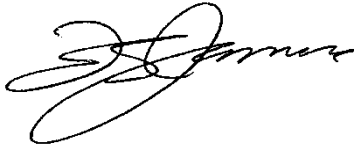
⁴ RSBC 1996, c 473.

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section 44 of the *Insurance Corporation Act*.⁵ That suggests the Commission's jurisdiction and role for the regulation of safety for ICBC is different than for public utilities. This underscores the inefficiency of potentially including the regulation of safety for ICBC in the scope of this Inquiry.

For further information, please contact the undersigned.

Yours sincerely,



Fred James
Chief Regulatory Officer

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⁵ RSBC 1996, c 228.