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BARRISTERS AND SOLICITORS

AQR file no. 20-121
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British Columbia Utilities Commission
 Suite 410, 900 Howe Street
 Vancouver, BC V6Z 2N3

Attention: Ms. Marija Tresoglavic, Acting Commission Secretary

filed online

Dear Ms. Tresoglavic:

Re: Inquiry into the Regulation of Safety

We continue to represent MoveUP in this proceeding and write further to the Commission's letter of December 17, 2020, inviting further submissions regarding the inclusion of ICBC in the scope of this proceeding.

Having reviewed the submissions filed by ICBC and BC Hydro, MoveUP accepts that the focus of this particular proceeding may be appropriately constrained to energy utilities, and not ICBC.

However, MoveUP maintains its position that in the Commission's proceedings more generally, safety issues are properly considered within the Commissions' general mandate of ensuring efficient operation for the benefit of ratepayers and the public. This applies equally to ICBC and to energy utilities, in our submission.

Yours truly,

ALLEVATO QUAIL & ROY

per **Susanna Allevato Quail**
 Barrister & Solicitor