

January 11, 2021

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Sent by E-mail

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**Attention: Marija Tresoglavic, Acting Commission
Secretary**

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Our reference 1000388060

Dear Commission Secretary,

**British Columbia Hydro and Power Authority Long-Term Resource Plan Filing Date ~
Project No. 1599117
AMPC's Submissions on Regulatory Timetable**

We are legal counsel to the Association of Major Power Customers (**AMPC**) in this matter and write on its behalf to provide intervener submissions further to British Columbia Utilities Commission (**BCUC**) Order G-300-20.

On September 3, 2020, AMPC filed a letter in support of BC Hydro's proposed September 2021 filing date for its LTRP, allowing for a six month delay from the February 28, 2021 date noted in the *Utilities Commission Act*.¹ After AMPC's submission, BC Hydro filed a request to suspend the proceeding in light of the provincial election, until 30 days after the new government had sworn in a Cabinet. BC Hydro also requested the opportunity to supplement its submissions with regard to its filing date.² In Order G-260-20, the BCUC directed BC Hydro to file an update on its 2021 IRP timeline. BC Hydro filed its updated proposal for the 2021 IRP on December 21, 2020.³ Its new proposed IRP filing date is December 2021.

AMPC does not support a further postponement of BC Hydro's IRP filing date for the following reasons:

- An additional three-month delay in BC Hydro's IRP filing date is not warranted and does not align with the one-month period of the provincial election blackout from September 21 to October 24, 2020.
- As BC Hydro notes in its own letter, the governing party was re-elected, and the Minister of Energy, Mines and Petroleum Resources which includes BC Hydro in its portfolio, has not changed.

¹ Exhibit C5-2.

² Exhibit B-4.

³ Exhibit B-7.

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- While AMPC is appreciative of BC Hydro's IRP-related consultation activities, AMPC is not persuaded BC Hydro cannot modify its timeline to fulfill its scheduled activities.
- BC Hydro reported that it has continued to work on technical analysis in support of the IRP.⁴
- The Province has already issued regulations and direction to the BCUC to address topics related to the IRP. On December 21, 2020, OIC 657/2020 was issued to establish a Direction to the BCUC requiring it to approve two new rates related to industrial electrification within 10 days of receiving BC Hydro's application. Rate Schedule 1894 (Clean Energy and Innovation) and Rate Schedule 1895 (Fuel Switching) are intended to provide reduced electricity rates to customers engaged in certain activities. Both rates reflect findings from the Comprehensive Review of BC Hydro, and support the objectives of the Province's CleanBC Plan. The Province is already moving forward with policy initiatives.
- BC Hydro has not provided an IRP for review since 2010. BC Hydro's IRP filing date has already shifted from the February 28, 2021 date initially contemplated and should not be postponed again.

AMPC emphasizes the importance of long-term planning, both for regulatory purposes and for its members' own business planning, and for all the reasons set out above, does not support a further delay in filing. Where BC Hydro can expedite its activities, including concluding its consultation activities prior to anticipated office closings in August 2021, the BCUC should direct BC Hydro to do so, in order to prioritize the filing of the 2021 IRP in a timely manner.

Yours very truly,



for: Matthew D. Keen

⁴ Exhibit B-5, page 1