

Sent: Friday, January 15, 2021 8:34 AM
To: Commission, Secretary
Subject: Request to Intervene

Date Submitted: January 15, 2021

Proceeding name: BC Hydro F2022 RRA

Participant contact information

Organization or individual name: Commercial Energy Consumers Association of British Columbia (the "CEC")

City: Vancouver

Province: British Columbia

Email: dwcraig@allstream.net

Phone number: 6045684904

For organizations only - representative contact information

Name: Chris Weafer

Organization (if different from above): Owen Bird Law Corporation

City: Vancouver

Province: British Columbia

Email: cweafer@owenbird.com

Phone number: 6046917557

Also representing (if applicable):

Additional information

Please state your reasons for intervening in this proceeding:

The CEC is composed of members which are commercial class customers of BC Hydro, a significant portion of BC Hydro's rate base.

Please state how you are directly or sufficiently affected by the Commission's decision in this matter; or describe your experience, information, or expertise relevant to this matter that would contribute to the Commission's decision making:

The interests and rates of the CEC's members will be affected by this application and therefore, it is important that the CEC is represented in this proceeding in order to ensure that the members' interests are articulated and represented. The CEC's participation will also assist in ensuring that a balanced approach is considered by the Commission in reviewing BC Hydro's Application and that commercial class customer ratepayers' interests are considered. The CEC has been actively represented on a consistent basis before the Commission since 2003.

Please list the key issues you intend to address in the proceeding:

1. Appropriateness of BC Hydro's assessment of the legal and regulatory framework; 2. Appropriateness of BC Hydro's load methodologies, revenue forecasts, scenario approach and the interpretation of the evidence; 3. Appropriateness of BC Hydro's assessment of its cost of energy and its management of these costs; 4. Appropriateness of BC Hydro's proposed overall operating costs and budgeting; 5. Appropriateness of BC Hydro's approach to Mandatory Reliability Standards, vegetation management, cybersecurity, training, Covid-19, labor and other inputs to operating costs; 6. Appropriateness of BC Hydro's proposed overall capital expenditures and additions; 7. Appropriateness of BC Hydro's planning and delivery processes and management of capital investments in key areas; 8. Appropriateness of BC Hydro's management of its regulatory accounts; 9. Appropriateness of BC Hydro's Other Revenue Requirements Items; 10. Appropriateness of BC Hydro's Transmission Revenue requirement; 11. Appropriateness of BC Hydro' approach to Demand Side management, historical results and planned expenditures; and 12. Other relevant issues that may arise of concern to commercial energy consumers.

For administrative purposes only

Do you intend to participate fully, including attendance at hearings and submission of evidence or information requests, if applicable?: Yes

Do you intend to request PACA funding? This does not impact your ability to participate: Yes

Have you or your organization web-registered as an intervener or interested party in the past 12 months?: Yes