

26 January 2021

VIA E-FILING

Marija Tresoglavic
Acting Commission Secretary
BC Utilities Commission
6th Floor 900 Howe Street
Vancouver, BC V6Z 2N3



Reply to: Leigha Worth
ED@bcpiac.org
Ph: 604-687-3034
Our File: 7500.123

Dear Ms. Tresoglavic,

**Re: British Columbia Hydro and Power Authority (BC Hydro) - Fiscal 2022 Revenue Requirements Application (F2022 RRA)
BCOAPO Information Request No. 1**

We represent the BC Old Age Pensioners' Organization, Active Support Against Poverty, Council of Senior Citizens' Organizations of BC, Disability Alliance BC, Together Against Poverty Society and the Tenant Resource and Advisory Centre, known collectively in this process as "BCOAPO et al."

Enclosed please find the BCOAPO's Information Request No. 1 with respect to the above-noted matter.

If you have any questions, please do not hesitate to contact the undersigned.

Sincerely,
BC PUBLIC INTEREST ADVOCACY CENTRE

Original on file signed by:

Leigha Worth
Executive Director | General Counsel

Encl.

REQUESTOR NAME: **BCOAPO**
INFORMATION REQUEST ROUND NO: **#1**
TO: **BRITISH COLUMBIA HYDRO &
POWER AUTHORITY**
DATE: **JANUARY 26, 2021**
PROJECT NO: **1599164**
APPLICATION NAME: **BC HYDRO'S F2022 RRA**

1.0 Reference: Exhibit B-2, page 1-4

Preamble: The Application states: "The COVID-19 pandemic has resulted in operating cost pressures and savings as well as cost reduction strategies, which largely occurred during the first two quarters of fiscal 2021. The net COVID-19 related cost pressures in fiscal 2021 are forecast at \$4.8 million."

1.1 Please provide a schedule that sets out both the sources and the associated values for the additional costs and the costs savings (including those arising from cost reduction strategies) arising from the COVID-19 pandemic for the first three quarters of fiscal 2021 and as forecast for year-end fiscal 2021.

2.0 Reference: Exhibit B-2, page 1-4

Preamble: The Application states: "The delivery of BC Hydro's capital investments was impacted by the COVID-19 pandemic; however, these changes are not expected to have a material impact on the forecast capital additions that affect the fiscal 2022 revenue requirements." (emphasis added)

2.1 Up to what point in time in 2020 does the Application incorporate actual (as opposed to forecast) capital additions?

2.2 Did the COVID-19 pandemic have an impact on the actual capital additions incorporated in the Application?

2.2.1 If so, please indicate the projects impacted and the nature of the impacts.

3.0 Reference: Exhibit B-2, pages 1-5 to 1-17

Preamble: The referenced pages discuss BC Hydro's consideration and response to various BCUC directives from the Commission's Decision regarding its F2020-F2021 RRA.

3.1 Please provide a schedule setting out those directives from BCUC Order G-246-20 that are not addressed in the current Application and, in doing so, please note those that the Commission specifically directed be addressed in BC Hydro's F2023 RRA.

4.0 Reference: Exhibit B-2, page 1-6

Preamble: Reference is made to the fiscal 2022 to 2024 Service Plan release being expected in early 2021.

4.1 What is the expected timing for the release of the Service Plan and, if available in time, will BC Hydro commit to filing it in this proceeding?

5.0 Reference: Exhibit B-2, page 1-6 and Appendix O

Preamble: The Application states: "Appendix O provides a list of the performance measures and targets that we use to manage operations at the Business Group level. Appendix Q provides BC Hydro's Service Plan performance measures and targets."

5.1 When were the Performance Metrics for each Business Group, as set out in Appendix O, established/approved?

5.2 Do the F22 financial targets for each Business Group match the costs/dollar values incorporated in the current Application?

5.2.1 If not, please provide a schedule that identifies any differences and the reason(s) for the variance.

6.0 Reference: Exhibit B-2, page 1-12

6.1 Please provide a copy of BC Hydro's Compliance Filing to the Previous Application.

7.0 Reference: Exhibit B-2, pages 1-22 & 1-25 and Appendix Q, page 15

7.1 Is the summary financial outlook for F2022 provided on page 15 of Appendix Q meant to be consistent (in terms of presentation approach) with the Gross View presented on page 1-22 of the Application or the Current View presented on page 1-25 of the Application?

8.0 Reference: Exhibit B-2, page 1-15

Preamble: The Application states: "We submit that the OATT should be maintained and modernized as needed to respond to specific customer needs and FERC developments."

8.1 What types of customer "needs" would lead to a need to change the OATT?

9.0 Reference: Exhibit B-2, page 2-5 and pages 2-12 to 2-14

Preamble: The Application states (page 2-5): "Section 8 requires the BCUC to ensure that BC Hydro collects sufficient revenue to recover the costs associated with these projects, programs, contracts and expenditures. Appendix I identifies the projects exempted under section 7 of the *Clean Energy Act*."

The Application also states (page 2-5): “Section 18 requires that the BCUC allow BC Hydro to collect sufficient revenue to recover costs incurred for implementing prescribed undertakings. Prescribed undertakings are projects, programs, contracts or expenditures prescribed for the purpose of reducing greenhouse gas emissions in British Columbia.”

- 9.1 Please confirm that Appendix I only identifies the capital project spending that is exempt under section 7.
- 9.2 Please provide a schedule that sets out any other programs, contracts and expenditures (for which there are costs in the proposed F2022 revenue requirement) that are exempt under section 7.
 - 9.2.1 As part of the response, for each of these programs, contracts and expenditures, please provide: i) the approved costs included in the F2021 RRA, ii) the current forecast of the costs for F2021 and iii) the proposed costs included in the F2022 RRA.
- 9.3 Please provide a schedule that sets out any prescribed (per Section 18) programs, contracts or expenditures for which there are costs in the proposed F2022 revenue requirement.
 - 9.3.1 As part of the response, for each of these programs, contracts and expenditures, please provide: i) the approved costs included in the F2021 RRA, ii) the current forecast of the costs for F2021 and iii) the proposed costs included in the F2022 RRA.

10.0 Reference: Exhibit B-2, page 2-17

- 10.1 Does BC Hydro actually own any of the sites where an eligible charging station is or will be located in F2022? If so, please provide a listing of such stations.
- 10.2 In those nine instances where BC Hydro currently leases certain charging equipment to a private entity or municipality are there lease payments paid to BC Hydro?
 - 10.2.1 If not, why not?
 - 10.2.2 If yes, is the F2020 and F2021 revenue from these lease payments included in Electric Vehicle Costs Regulatory Account as a cost offset?
 - 10.2.3 If yes, where in the proposed F2022 revenue requirement are the revenues from these lease payments included?

11.0 Reference: Exhibit B-2, pages 2-18 to 2-21

- Preamble: The Application states (page 2-18): “The time to determine whether the applicable site limit is exceeded is “on the date the public utility decides to construct or purchase an eligible charging station””.

The Application also states (page 2-21):
“During fiscal 2022, BC Hydro reasonably expects to construct and operate new fast charging stations, 26 of which will be at existing sites and 31 of which will be at 16 new sites. Five new sites will be in limited municipalities: Burnaby, Maple Ridge, Prince Rupert, Surrey, and Terrace”

- 11.1 With respect to the five new sites has BC Hydro already formally decided to construct/purchase the charging stations?
 - 11.1.1 If yes, when was the decision made with respect to each site and what the approval authority?
 - 11.1.2 If no, when does BC Hydro anticipate the formal decision(s) will be made?
 - 11.1.3 If no and, at the time the decision is made, it is determined that the site limit is exceed, how would BC Hydro address the fact that costs for the site were included in the F2022 revenue requirement?

12.0 Reference: Exhibit B-2, pages 3-1 and 3-15

Preamble: The Application states: “As of November 2020, two-thirds of the way through fiscal 2021, actual total domestic sales were 1.2 per cent higher than COVID-19 Scenario A for the three main customer classes on an accrued sales basis. Given this performance, we believe that Scenario A is appropriate for the purpose of forecasting revenue to set rates for the Test Period.”

- 12.1 Are both the March 2020 load forecast and the COVID-19 Scenario A values for F2022 based on a “normal” weather year?
- 12.2 In making the comparison between actual total domestic sales and the COVID-19 Scenario A for the period up to November 2020 were the actual sales values weather normalized?
 - 12.2.1 If not, what would be the comparison on a weather-normalized basis?
- 12.3 Please update the comparison presented in Table 3-3 of actual F2021 sales versus those in the COVID-19 Scenario A to include all of the months for which weather normalized actual sales data is now available. In doing so please also include rows that set out the March 2020 Load Forecast values for each sector and compare these values with the weather normalized actuals.

13.0 Exhibit B-2, pages 3-16 to 3-17 and Appendix D, pages 4-6 and 8-10

- 13.1 Please confirm that the Residential load forecast for F2022 is based on the March 2020 Load Forecast.

- 13.2 With respect to Exhibit B-2, Table 3-4 please provide similar schedules for the Residential sector for: i) F2021 based on the previous RRA approvals and ii) F2022 based on the October 2018 Load Forecast.
- 13.2.1 If material (e.g. more than 5%) please explain the change in Use per Accounts as between: i) the 9,865 kWh currently forecast for F2022 and the F2021 value from the previous RRA and ii) 9,865 kWh currently forecast for F2022 and the F2022 value from the October 2018 Load Forecast.
- 13.2.2 If material (e.g. more than 5%), please explain the change in the Codes Overlap Adjustment as currently forecast for F2022 and the F2022 value from the October 2018 Load Forecast.
- 13.2.3 If material (e.g. more than 5%), please explain the change in the EV Load Additions that are currently forecast for F2022 and the F2022 value from the October 2018 Load Forecast
- 13.2.4 If the DSM adjustment set out in Table 3-4 is not expressed/calculated on a comparable basis (e.g. uses the same base year) with the basis used for the Residential forecast for F2022 based on the October 2018 Load Forecast (per item (ii) above), please explain and quantify the difference.
- 13.3 What leads to the residential account increase for F2022 as compared to the October 2020 Load Forecast (e.g. is it higher actual values to date and/or higher forecast housing growth for F2022)?

14.0 Reference: Exhibit B-2, pages 3-17 to 3-18 and Appendix D, pages 24-25

- 14.1 Please confirm that the Commercial load forecast for F2022 is based on the March 2020 Load Forecast.
- 14.2 With respect to Exhibit B-2, Table 3-5 please provide similar schedules for the Commercial sector for: i) F2021 based on the previous RRA approvals and ii) F2022 based on the October 2018 Load Forecast.
- 14.2.1 If material (e.g. more than 5%) please explain the change as between the Commercial kWh currently forecast for F2022 and the F2022 value from the October 2018 Load Forecast.
- 14.2.2 If material (e.g. more than 5%), please explain the change in the Codes Overlap Adjustment that as currently forecast for F2022 versus the F2022 value from the October 2018 Load Forecast.
- 14.2.3 If material (e.g. more than 5%), please explain the change in the EV Load Additions that are currently forecast for F2022 versus the F2022 value from the October 2018 Load Forecast
- 14.2.4 If the DSM adjustment include in Table 3-5 is not expressed/calculated on a comparable basis (e.g. uses the same base year) with the basis used

for the Commercial forecast for F2022 based on the October 2018 Load Forecast (per item (ii) above), please explain and quantify the difference.

15.0 Reference: Exhibit B-2, pages 3-18 to 3-20 and Appendix D, pages 10-11 and 26

- 15.1 Please provide the economic impact scenarios published by the BCBC on March 27, 2020 (per Appendix D, page 26).
- 15.2 Please provide a schedule that compares the GDP forecasts for F2020 and F2021 as used for the Light Industrial Sector load forecast in: i) the March 2020 Load Forecast and ii) COVID-19 Scenario A.
- 15.3 Appendix D pages 10-11 indicate that for the Coal Mining, Forestry and Oil & Gas sub-sectors the March 2020 Load Forecast was determined on an individual customer account basis while for other Light Industrial accounts a regression model using GDP was used as the basis for the forecast. Appendix D, page 26 states that for the COVID-19 Scenario A an alternative GDP forecast (from BCBC) was used in conjunction with the regression model. Please explain how, for the COVID-19 Scenario A, the forecasts for the Coal Mining, Forestry and Oil & Gas sub-sectors were developed.
- 15.4 With respect to Exhibit B-2, Table 3-6 please provide similar schedules for the Light Industrial sector for: i) F2021 based on the previous RRA approvals; ii) F2022 based on the October 2018 Load Forecast and F2022 based on the March 2020 Load Forecast.
 - 15.4.1 If material (e.g. more than 5%), please explain the change as between the Light Industrial sector kWh currently forecast for F2022 (per the March 2020 Load Forecast) and the F2022 value from the October 2018 Load Forecast.
 - 15.4.2 If material (e.g. more than 5%), please explain the change in the Cannabis-cryptocurrency load addition as currently forecast for F2022 versus the F2022 value from the October 2018 Load Forecast.
 - 15.4.3 If material (e.g. more than 5%), please explain the change in the Construction load addition currently forecast for F2022 versus the F2022 value from the October 2018 Load Forecast.
- 15.5 If the DSM adjustment include in Table 3-6 is not expressed/calculated on a comparable basis (e.g. uses the same base year) with the basis used for the Commercial forecast for F2022 based on the October 2018 Load Forecast (per item (ii) above), please explain and quantify the difference.
- 15.6 In the previous proceeding (Appendix O, page 60) the Light Industrial Loss Reductions were 1 GWh and 2 GWh for F2020 and F2021 respectively. Please explain the increase in the Loss Reduction value to 158 GWh in the current forecast for F2022.

- 15.7 With respect to Exhibit B-2-2, Appendix D, page 11, has the BC Ministry of Finance or the CBoC released any forecasts of GDP for 2020 and 2021 since the start of the pandemic? If yes, please provide the forecasts and contrast them with the forecast used in COVID-19 Scenario A.
- 16.0 Reference: Exhibit B-2, pages 3-20 to 3-23 and Appendix D, pages 11-13 and 26-28**
- 16.1 Please provide a schedule that sets out for each of F2021 and F2022 the forecast loads for each of the sub-sectors in Table 3-7 based on: i) the October 2018 Load Forecast, ii) the March 2020 Load Forecast and iii) COVID-19 Scenario A.
- 17.0 Reference: Exhibit B-2, pages 3-16, 3-18 and 3-19**
- 17.1 Please explain why in Tables 3-4, 3-5 and 3-6, loss reduction led to a decrease in the forecast load for the Residential, Commercial and Light Industrial sectors respectively.
- 18.0 Reference: Exhibit B-2-2, pages 14-16**
- 18.1 Please provide a schedule that sets out the EV forecast for EV GWh load additions and EV stock in F2020, F2021 and F2022 per: i) the October 2018 Load Forecast (from Appendix O in the previous RRA proceeding and ii) the March 2020 Load Forecast.
- 18.2 Please explain any material differences (>5%) for F2021 and/or F2022.
- 19.0 Reference: Exhibit B-2, page 3-12 (Table 3-1) and Exhibit B-2-2, Appendix A, Schedule 14.0**
- 19.1 Are the F2017-F2020 actual values in Table 3-1 weather normal values?
- 19.1.1 If yes, please explain why they do not match the F2017-F2020 values in Schedule 14.
- 19.2 Please explain why the F2021 Forecast and F2022 Plan values in Schedule 14 do not match the COVID-19 Scenario A values for the same years.
- 20.0 Reference: Exhibit B-2, pages 2-4 and 4-1**
- Preamble: The Application states (page 2-4): “BC Hydro files separate applications pursuant to section 71 of the Utilities Commission Act seeking acceptance of any non-exempt EPAs that constitute energy supply contracts.”
- The Application states (page 4-1):
“In the Application, BC Hydro is not seeking acceptance of any Electricity Purchase Agreements (EPAs). A new Transfer Pricing Agreement between BC Hydro and Powerex came into effect on April 1, 2020 (2020 TPA). BC Hydro has submitted the 2020 TPA to the BCUC under section

71 of the Utilities Commission Act and it is being reviewed through a separate proceeding.”

20.1 Apart from the purchases associated with the 2020 TPA, does the forecast cost of energy for F2022 include any purchases associated with non-exempt EPAs that have not been accepted by the BCUC?

20.1.1 If yes, please identify the F2022 costs included in Table 4-5 for these contracts and the associated volume (GWhs).

20.1.2 If yes, please indicate when BC Hydro anticipates filing applications for acceptance pursuant to Section 71 of the UCA.

21.0 Reference: Exhibit B-2-2, Appendix A, Schedule 4.0

21.1 What is the basis for the forecast F2022 Line Loss and System Use value of 5,376 GWh/10.25%?

21.2 Please provide a schedule that sets out for the F2021 RRA, the F2021 Forecast and F2022 Plan the forecast costs and GWH purchases under the Biomass Program (per page 2-7). Please also indicate where these are included in Schedule 4.0.

21.3 Please provide a schedule that sets out for the F2021 RRA, the F2021 Forecast and F2022 Plan the forecast costs and GWH purchases under the exempt EPAs (per page 2-4). Please also indicate where these are included in Schedule 4.0.

22.0 Reference: Exhibit B-2, pages 4-2, 4-11 & 4-13 and Exhibit B-2-2, Appendix A, Schedule 4.0

22.1 With respect to Table 4-6, please provide separate columns setting out the GWhs associated with each of the costs provided.

22.2 At page 4-2, the Application makes reference to new EPAs from a small number of potential new First Nations energy projects and from two potential EPAs related to the SOP. However, Table 4-6 does not identify any new EPAs in either category for F2020, F2021 or F2022. Please reconcile.

22.3 Does Table 4-6 include, for F2022, the costs for any new EPAs or renewals not included in the F2021 RRA costs?

22.3.1 If yes, for each row in Table 4-6, please identify the impact on the F2022 supply volume and costs associated with these EPAs.

23.0 Reference: Exhibit B-2, pages 4-6 to 4-8 and Exhibit B-2-2, Appendix A, Schedule 4.0

23.1 The increase in the cost of gas is attributed to the increase in generation at the Fort Nelson generating station (page 4-8). Schedule 4.0 indicates that the Natural Gas for Thermal Generation GWh volumes increase over 25% in F2022

as compared to the F2021 Forecast. Please explain more fully the reasons for this significant increase.

24.0 Reference: Exhibit B-2, page 4-17 to 4-20 and Exhibit B-2-2, Appendix A, Schedule 4.0

Preamble: The Application (page 4-18) states: “While transactions under the 2020 TPA are categorized differently than under the 2003 TPA, the nature of the transactions has not changed. BC Hydro is still financially accountable for the sale of surplus energy and the purchase of energy to meet domestic load requirements, while Powerex is still financially accountable for purchases and sales to generate Trade Income.”

The Application also states (pages 4-19 to 4-20): “Under the 2020 TPA, since these activities are no longer separated, BC Hydro’s forecast annual system surplus relative to forecast System Exports is used in the calculation of BC Hydro’s domestic transmission costs. As shown in Table 4-9 above, due to a higher forecast annual system surplus, the fiscal 2022 Plan amount is \$10.5 million higher than the fiscal 2021 Plan amount.”

- 24.1 With respect to Schedule 4.0, for the F2021 Forecast and the F2022 RRA, please breakout the GWh and costs associated with BC Hydro’s sale of surplus energy and purchases of energy to meet domestic load.
- 24.2 Are the costs for Domestic Transmission-Export associated with just exports associated with BC Hydro’s sale of Surplus Energy (i.e., Surplus Sales) or also with the Powerex’s export sales for purposes of generating Trade Income?
- 24.3 Does the reference to the fiscal 2021 Plan mean the F2021 RRA?
- 24.4 Please provide a reference to where in the Application the annual system surplus (GWh) for each of the following can be found: i) F2021 RRA, ii) F2021 Forecast, and iii) F2022 RRA.
 - 24.4.1 If there is no reference, please provide a schedule setting out the relevant values.
- 24.5 Please provide a schedule setting out the calculation of the F2022 Domestic Transmission-Export costs as described on page 4-19 and provide references to where in the Application the various inputs can be found.

25.0 Reference: Exhibit B-2, pages 5-11 to 5-13

- 25.1 Please provide a schedule that breaks down the \$49.7 M increase in Reliability Investments by the three contributing factors discussed on pages 5-11 to 5-12.
- 25.2 Please provide a schedule that breaks down the \$48.5 M increase in uncontrollable costs by the three contributing factors discussed on page 5-12.

25.3 Please provide a breakdown of the \$6.8 M in costs contributing to the “other net cost increases” discussed on page 5-12 to 5-13.

26.0 Reference: Exhibit B-2, pages 5-7 to 5-8 and 5-16

26.1 With respect to Table 5-4, please separate the “Other” column into two: i) one for capitalized costs and ii) a second for Office of the President and Chief Executive Officer, Office of the General Counsel and Corporate Costs.

26.2 Please explain what is included in Corporate Costs (per footnote 80) and why it does fall under the responsibility of a specific Business Group.

27.0 Reference: Exhibit B-2, page 5-20 to 5-21

27.1 If the function was brought in-house in F2020 (i.e., September 2019), were the \$1.6 M in savings built into F2021 RRA?

27.1.1 If not, why not?

27.1.2 If yes, why is the \$1.6 M savings considered to be incremental to the F2021 Base Operating Costs.

27.2 Please confirm that the \$2.3 M attributable to increased costs eligible for capitalization will be recovered from customers in future rates.

28.0 Reference: Exhibit B-2, page 5-21 and 5-93

28.1 How many of the apprentices and trainee FTEs did BC Hydro have in F2021 RRA and F2021 Forecast? As part of the response please provide a breakdown as between capital and operating FTEs.

28.2 How many of the F2021 apprentice and trainee FTEs were “graduating” (i.e., will no longer be apprentices or trainees) in F2022?

28.3 If the 43 FTE reduction in apprentices and trainees are all related to the capital program (per page 5-93) please explain how this generates \$1.3 M savings in period costs.

28.4 Given the current COVID-19 pandemic circumstances, would BC Hydro have been able to hire an additional 43 apprentices and trainees for F2022?

29.0 Reference: Exhibit B-2, page 5-21

29.1 With respect to the Storm Restoration savings, please confirm that:

- The savings are not a result of a mitigation strategy or initiative by BC Hydro to manage cost pressures, and
- Any variances between actual and forecast storm restoration costs are recorded in the Storm Restoration Costs regulatory account for future refund/recovery.

30.0 Reference: Exhibit B-2, pages 5-24 and 5-32

- 30.1 What were the operating costs and FTEs included in the F2021 RRA for maintaining and achieving compliance with MRS (i.e., the base values over which the \$21.7 M and 21.5 FTEs are considered to be incremental)?
- 30.2 With respect to Table 5-10, is it correct to interpret the table as indicating that of the \$21.7 M, \$21.3 M is required in order to achieve compliance with MRS standards and version currently in place (i.e. as of the time of the Application) and that the \$0.4 M is required to achieve compliance with new standards and versions anticipated to be adopted in the future?

30.2.1 If not, please clarify what the values represent.

- 30.3 Is BC Hydro currently in compliance with the existing MRS standards and versions?

30.3.1 If yes, please explain more fully the need for an additional \$21.3 M in order to ensure compliance.

- 30.4 The Application states (page 5-34): “The investment of \$21.7 million in fiscal 2022 lays a strong foundation (through improved processes, documentation, systems and training) that will make CIP Version 7 easier to implement.” This statement appears to suggest that at least part of the \$21.7 M is one-time costs related to improving documentation, systems and training.

30.4.1 Is this the case or is all of the \$21.7 M required on an ongoing basis in future years beyond F2022?

30.4.2 If required on an ongoing basis, please explain why.

31.0 Reference: Exhibit B-2, pages 5-34 and 5-39

- 31.1 How many FTEs were included in the F2021 RRA to support the vegetation management program?

32.0 Reference: Exhibit B-2, pages 5-34; 5-37 to 5-38; 5-41 and 5-48

Preamble: The Application states (page 5-34): “Vegetation that was cleared during a period of heightened activity over a decade ago has regrown and is now reaching maturity size that poses a risk to the system.”

The Application also states (page 5-48): “The analysis quantified the accumulation of vegetation clearing that needs to be addressed over the next few years to support reliability and safety.”

- 32.1 These statements would appear to suggest that at least part of the \$25 M increase can be viewed as one-time costs to address the additional growth related to vegetation clearing activities that occurred over a decade ago. Is this the case?

32.1.1 If yes, what portion can be viewed as one-time costs that will be incurred over the next few years?

32.1.2 If not, why not?

33.0 Reference: Exhibit B-2, page 5-44 to 5-45; 5-48 and 5-51

Preamble: The Application states (page 5-44): "From fiscal 2009 to present, the vegetation program remained near \$50 million per year in real terms. The program absorbed significant cost pressures during this period."

The Application states (page 5-45): "While many of these cost pressures were not significant individually, the aggregate effect, when combined with a flat budget, resulted in a reduced overall work output."

The Application also states (page 5-51): "Costs of program delivery have increased by approximately 20 per cent in the last five years whereas the annual expenditure has remained relatively unchanged (consistent year over year in real dollars)."

33.1 Is the 20% referenced on page 5-51 based on the increase in real costs (i.e., annual costs adjusted for inflation)?

33.1.1 If not expressed in real cost, what is the percentage increase in real costs over the period?

33.2 With respect to Table 5-12, please explain why "inflation" is considered a cost pressure when the \$50 M is expressed in real terms.

33.3 With respect to Table 5-12, please explain what is meant by "increased market demand for vegetation services".

33.4 Can BC Hydro provide the historical values for any measures of vegetation work output (e.g. km cleared/year or hectares clear/year) that would demonstrate that overall work output was reduced over the last decade? If so, please provide the values for such measures for the period 2009 to 2019.

34.0 Reference: Exhibit B-2, page 5-54

34.1 If available, please update Figure 5-5 to include F19 and F20.

35.0 Reference: Exhibit B-2, pages 5-57 to 5-59 and pages 5-60 to 5-62

35.1 Please provide a schedule that for F2019 Actual; F2020 RRA, F2021 RRA sets out the Transmission hectares cleared and number of trees hot-spotted comparable to the planned results for F2022 set out at pages 5-60 to 5-61.

35.2 Did the F2019 Actual, F2020 RRA or F2021 RRA also include any spending for the removal of high risk edge trees (comparable to the 15,000 planned for F2022)? If yes, what were the values?

- 35.3 Figure 5-6 sets out a Summary of Sustainable Transmission Vegetation Cycles in terms of number of hot spotted trees and hectares treated annually. However, the Figure and supporting discussion in the Application makes no reference to work required regarding “high edge risk trees” which is an additional activity planned for F2022 (per page 5-61). Please indicate what level of activity with respect to “high edge risk trees” is associated with the cycles set out in Figure 5-6.

36.0 Reference: Exhibit B-2, pages 5-71 and 5-76

- 36.1 Are the Hazard Tree Unit Costs in Figure 5-12 expressed in real terms?
- 36.2 In Figure 5-12 the Distribution Vegetation Management Costs are identified as “budget costs”. If the actual spending in each year was different, please re-do the figure with the actual total Distribution Vegetation Management Costs and the actual Unit costs. (Note: It is acknowledged that “actual” values are not available for F2021)
- 36.3 For the years F2011 to F2020, is the number of hazard trees cleared (per Figure 5-13) the basis for the Distribution Vegetation Management Budget and \$/Tree values set out in Figure 5-12?
- 36.3.1 If not, please what is the number of hazard trees for each year consistent with Figure 5-12?

37.0 Reference: Exhibit B-2, pages 5-73 to 5-76 to 5-77

- Preamble: The Application states (page 5-73): “Of the \$4.7 million increase to distribution vegetation management, approximately \$2 million will be allocated to hazard tree removal.”
- The Application also states (page 5-76): “Today (mid 2021), there is a documented inventory of approximately 18,000 hazard trees.”
- The Application further states (page 5-77): “Approximately half of the \$4.7 million increase for distribution vegetation management will be allocated to hazard tree removal to begin to address this accumulation and increase the number of hazard trees cleared in fiscal 2022. BC Hydro expects that a number of years of similar incremental investment in the distribution system will be required to fully address the accumulation and return hazard trees to a regular annual cycle.”
- 37.1 Is the inventory of 18,000 hazard trees as of mid-2021 (presumably mid-F2021) determined on the same basis as the 14,186 hazard tree accumulation as of F2020 (per Figure 5-13)? If not, what is the difference?
- 37.2 The statements noted in the preamble suggest that part of the \$2 M allocated to hazard tree removal is one-time costs related to removing/reducing the hazard tree inventory. Is this the case?
- 37.2.1 If not, why not?
- 37.2.2 If yes, how much of the \$2 M is related to removing the inventory and for how many years will similar incremental spending be required?

38.0 Reference: Exhibit B-2, pages 5-77 and 5-80

Preamble: The Application states (page 5-77): “The Technology KBU has also internally repurposed \$0.4 million for two FTE positions to focus on cybersecurity activities.”

The Application also states (page 5-80): “BC Hydro reallocated two resources within the Technology KBU to the department in fiscal 2021 to enhance program and risk management.”

38.1 Are the two resources reallocated in F2021 (per page 5-80) the same two FTE positions discussed on page 5-77?

39.0 Reference: Exhibit B-2, page 5-85

39.1 Will the additional resources required for the Cybersecurity function be needed on a permanent basis after F2022 or is some portion a one-time incremental expense need for a set number of years?

40.0 Reference: Exhibit B-2, page 5-87

Preamble: The Application states: “As a result, BC Hydro has included an increase of \$3.3 million in the Test Period, which will provide an average of an additional three-and-a-half training days per IBEW employee for a total of 13.5 days of training.”

40.1 How will allowing each IBEW employee an average of an additional 3.5 training days be accomplished while completing the planned work programs and what does the \$3.3 M represent? For example, does the \$3.5 M represent the cost of the additional FTEs to replace the 3.5 days of lost work time per IBEW employee?

41.0 Reference: Exhibit B-2, page 5-88

41.1 Please clarify what the \$4.8 M represents. Is it the net increase in F2021 costs related to the pandemic (i.e., pandemic related costs less savings achieved)?

42.0 Reference: Exhibit B-2, pages 5-90 to 5-94

42.1 With respect to Table 5-14 and the change in Operating FTEs between F2021 RRA and F2022 RRA, please provide a schedule that sets out for each contributing factor noted on page 5-93 (lines 6-20), the incremental impact on F2022 operating costs.

42.2 With respect to Table 5-14 and the change in Capital FTEs between F2021 RRA and F2022 RRA, please provide a schedule that sets out for each contributing factor noted on page 5-93 (lines 23) to page 5-94 (line 13) the incremental impact on F2022 operating costs.

42.3 Page 5-93 reports a 54 FTE decrease related to the reduction in apprenticeship and trainee intakes (including overtime FTEs). However, Table 5-15 (which includes both regular and overtime FTEs) only shows a reduction of 43. Please reconcile.

43.0 Reference: Exhibit B-2, page 5-101

- 43.1 Would the COVID-19 pandemic have had any impact on the vacancy factor results for F2020?
- 43.2 BC Hydro states that it plans on carrying out a vacancy factor analysis related to F2021 once that fiscal year is completed. Is the COVID-19 pandemic expected to have an impact on the vacancy factor results for F2021?
- 43.2.1 If not, why not?
- 43.3 Does BC Hydro expect the current COVID-19 pandemic to impact either the turnover rate for employees in F2022 or its ability to fill vacancies in F2022?
- 43.3.1 If not, why not?
- 43.3.2 If yes, directionally what does BC Hydro expect the impact to be?
- 43.4 When referring to the fact that BC Hydro has used the same amount of vacancy savings for F2022, is BC Hydro referring to the \$9.0 M per Table 5-17?

44.0 Reference: Exhibit B-2, page 5-104

- 44.1 What is the basis for the 60% factor used to determine the operating portion of the \$56.0 M increase in planned current service costs? As part of the response please indicate how the increase in planned current service costs related to employees whose work is charged to regulatory accounts (see Figure 5-14) is treated.

45.0 Reference: Exhibit B-2, page 6-7 and Appendix P, page 7 (Table 7)

- 45.1 It is noted that the actual capital additions for F2020 are 12% below those in the F2020 RRA. However, the actual F2020 amortization of capital assets is slightly higher than that in the F2020 RRA. Please reconcile.

46.0 Reference: Exhibit B-2, pages 6-6 to 6-7

Preamble: At the time of the F2020/F2021 RRA the capital expenditures and capital additions for F2019 were forecast values.

- 46.1 Please provide tables similar to Table 6-1 and 6-2 but for Fiscal 2019.
- 46.2 For both the F2019 capital expenditures and capital additions please provide variance explanations where the difference between the forecast value per the F2020/F2021 RRA and the actual value is greater than 10% or \$10 M.

47.0 Reference: Exhibit B-2, pages 6-6 to 6-7 and Appendix P, pages 17-21

- 47.1 With respect to the John Hart Generating Station Replacement project (Appendix P, pages 17-18), please provide the actual total project cost and the approved authorized project cost.
- 47.1.1 Is the approved authorized project cost the same as that in the CPCN approval? If not, what was the CPCN approval cost and please provide a

variance explanation if the actual cost was 5% or more above the CPCN approval?

- 47.2 With respect to the Ruskin Dam and Powerhouse Upgrade project, please provide a reference as to where in the Previous (F2020/2021) Application's Appendices I and J the details for the project can be found.
- 47.3 With respect to the Ruskin Dam and Powerhouse Upgrade project (Appendix P, page 18), please provide the actual total in-service project cost and the approved authorized project cost.
- 47.3.1 Is the approved authorized project cost the same as that approved at the time it was originally initiated? If not, what was the initial cost and please provide a variance explanation if the actual cost was 5% or more above this value?
- 47.4 With respect to the Wahleach Fire Risk Reduction project (Appendix P, page 18), please provide the actual total in-service project cost and the approved authorized project cost.
- 47.4.1 Is the approved authorized project cost the same as that approved at the time it was originally initiated? If not, what was the initial approved cost and please provide a variance explanation if the actual cost was 5% or more above this value?
- 47.5 With respect to the Jordan Fire Risk Reduction project, please provide a reference as to where in Appendix I of the current Application the details can be found.

48.0 Reference: Exhibit B-2, pages 6-6 to 6-7 and Appendix P, pages 22-28

- 48.1 The Application (Appendix P, page 24) states that F2020 capital expenditures for Transmission Sustain-Stations-Circuit Breakers were comparable to the F2020 RRA. However, the difference is 25%. Please provide a variance explanation.
- 48.2 With respect to the Substation 60 KV Circuit Breaker Replacement project, were fewer units than planned placed in service in F2020 because fewer replacements were required or because the replacement of some units has been delayed?
- 48.2.1 If the latter, please indicate whether this impacted the F2021 Forecast or the F2022 Plan for capital additions (per Table 6-2).
- 48.3 The Application (Appendix P, page 25) states that the F2020 capital spending for the JOR T1 & T2 Replacement project has been delayed. Is there spending for this project in the current Application?
- 48.3.1 If yes, please indicate whether this impacted the F2021 Forecast or the F2022 Plan for capital additions (per Table 6-2).
- 48.4 With respect to the Substation Feeder Section Upgrade program (Appendix P, page 26), were fewer units than planned placed in service in F2020 because

fewer upgrades were required or because the upgrade of some units has been delayed?

48.4.1 If the latter, please indicate whether this impacted the F2021 Forecast or the F2022 Plan for capital additions (per Table 6-2).

48.5 The Application (Appendix P, page 26) states that F2020 capital expenditures for Transmission Sustain-Stations-Protection and Control were comparable to the F2020 RRA. However, the difference is 68%. Please provide a variance explanation.

48.6 The Application states (Appendix P, page 27) that the Wood Pole Substation Replacement – PSN project & MTE project are delayed. Is there spending for these projects included in the current Application?

48.6.1 If yes, please indicate whether the delay impacted the F2021 Forecast or the F2022 Plan for capital additions (per Table 6-2).

48.7 With respect to the Substation Safety and Minor Capital program (Appendix P, page 27), were fewer units than planned placed in service in F2020 because fewer upgrades were required or because the upgrade of some units has been delayed?

48.7.1 If the latter, please indicate whether this impacted the F2021 Forecast or the F2022 Plan for capital additions (per Table 6-2).

49.0 Reference: Exhibit B-2, pages 6-6 to 6-7 and Appendix P, pages 29-33

49.1 At Appendix P (pages 31-32), two Distribution Growth-System Expansion and Improvement projects are discussed where the capital additions were delayed to F2021. In either case, have the project's in-service costs increased as a result of the delay and, if so, by how much?

49.2 Did the actual in-service cost of the New Feeder to Bowen Island (Appendix P, page 32) exceed the F2020/2021 RRA cost and, if yes, what was the variance?

50.0 Reference: Exhibit B-2, pages 6-6 to 6-7 and Appendix P, pages 34-36

50.1 Does the increased capitalization of the software licensing contract (\$17.5 M per Appendix P, page 34) impact the operating costs for F2022 as compared to those in the F2020/2021 RRA?

50.1.1 If not, why not?

50.1.2 If yes, where is this operating cost reduction show in Chapter 5 (particularly Tables 5-4 and 5-6)?

50.2 Does the increased capitalization of the Information Technology Service Management Toolset project (Appendix P, page 35) impact the operating costs for F2022 as compared to those in the F2020/2021 RRA?

50.2.1 If not, why not?

50.2.2 If yes, where is this operating cost reduction show in Chapter 5 (particularly Tables 5-4 and 5-6)?

51.0 Reference: Exhibit B-2, pages 6-11 & 6-13 and Appendix E

Preamble: The Application states (page 6-11):

“BC Hydro has maintained the integrity of the currency date of the Capital Plan to the extent possible in this chapter, in both the financial tables and the discussion of capital investments. We have noted specific exceptions to this currency date in the Application, specifically in sections 6.4 for Power System investments and 6.5 for Technology investments as well as in Appendix I, where differences are material.”

The Application also states (page 6-13):

“As of September 2020, the change control practice logged 61 projects that had a schedule or cost impact primarily driven by the COVID-19 pandemic. Of these 61 projects, six experienced a delay in their In-Service Date. The remainder experienced cost related impacts or schedule delays on interim milestones that did not impact an In-Service Date.”

51.1 Please provide a schedule that identifies all of the F2022 capital expenditures and in-service additions that are “exceptions” to the F2021-F2030 Capital Plan (Appendix E) and which are included in/impact the Application’s F2022 revenue requirement.

51.2 Please provide a schedule that sets out any other changes (>\$2 M) in F2022 capital spending/capital additions at the project level that are known to BC Hydro but not included in the Application.

52.0 Reference: Exhibit B-2, page 6-14

Preamble: The Application states:

“For example, BC Hydro recently decided to cancel the Asset Investment Planning Tool project in light of new information on the expected total project cost. When considered within the overall technology roadmap for BC Hydro, it will be more cost-effective to pursue this project following the consolidation of BC Hydro’s asset data repositories and implementation of an enterprise asset management platform so that the required inputs to improve asset investment planning and prioritization can be directly integrated with the asset health information. Additionally, the availability of subject matter expertise within our planning groups to successfully support the project is limited given other corporate wide priorities. BC Hydro will revisit the need for a similar investment when greater benefit can be derived. Notwithstanding the cancellation of this project, BC Hydro continues to improve its capital planning process.”

52.1 Can BC Hydro provide any indication as to when the need for the AIP Tool (or something similar) will be revisited?

53.0 Reference: Exhibit B-2, page 6-18

53.1 For each of the periods F2012-F2016 and F2016-F2020, please provide the number and percentage of projects where actual costs exceeded approved costs by: i) more than 5% and ii) more than 10%:

53.2 For F2018 and F2019, please provide the number of projects completed, the total original approved cost for the projects and the total actual cost for the projects.

54.0 Reference: Exhibit B-2, pages 6-21 to 6-31 and Appendix I

54.1 Please identify any Generation capital projects with total in-service cost greater than \$5 M that were not identified in the Previous Application's Appendix I (apart from those noted on pages 6-26 and 6-29 to 6-30) and where there is spending and/or capital additions for F2022 in the current Application's Appendix I.

54.2 Please identify any Generation capital projects that were included in Appendix J of the Previous Application where spending was (at that time) anticipated for F2022 but there is no spending included in the current Application?

55.0 Reference: Exhibit B-2, pages 6-21 to 6-22

55.1 With respect to Table 6-4, please identify those Generation spending categories (i.e., rows) where the difference between the capital spending for the F2021 RRA and the F2021 Forecast is greater than \$10 M and provide the following: i) a variance explanation and ii) whether the variance impacts the forecast F2022 RRA Generation capital spending.

55.2 With respect to Table 6-5, please identify those Generation spending categories (i.e., rows) where the difference between the capital additions for the F2021 RRA and the F2021 Forecast is greater than \$10 M and provide the following: i) a variance explanation and ii) whether the variance impacts the forecast F2022 RRA Generation capital additions.

56.0 Reference: Exhibit B-2, pages 6-33 to 6-43 and Appendix I

56.1 Was the original BMT to DAW Transmission Voltage Conversion project included in the Previous Application (page 6-37)?

56.2 Please identify any Transmission Growth capital projects with total in-service costs greater than \$5 M that were not identified in the Previous Application's Appendix I (apart from those noted on pages 6-37 to 6-38 and 6-46 to 6-48) and where there is spending and/or capital additions for F2022 in the current Application's Appendix I.

56.3 Please identify any Transmission Growth capital projects that were included in Appendix J of the Previous Application where spending was (at that time)

anticipated for F2022 but there is no spending included in the current Application?

57.0 Reference: Exhibit B-2, pages 6-43 to 6-56 and Appendix I

- 57.1 Transmission Sustain-Stations-Other Power Equipment capital additions for F2022 are higher than those in both F2020 and F2021 (whether it's the RRA values or the Actual/Forecast values). Please explain why.
- 57.2 Transmission Sustain-Stations-Stations Auxiliary Equipment capital additions for F2022 are significantly higher than the F2020 Actuals or the F2021 Forecast. Please explain why.
- 57.3 Transmission Sustain-Stations-Telecommunications capital additions for F2022 are significantly higher than the F2020 Actuals or the F2021 Forecast. Please explain why.
- 57.4 Transmission Sustain-Lines-O/H Lines Life Extension capital additions for F2022 are higher than those in both F2020 and F2021 (whether it's the RRA values or the Actual/Forecast values). Please explain why.

58.0 Reference: Exhibit B-2, pages 6-33 to 6-34

- 58.1 With respect to Table 6-11, please identify those Transmission spending categories (i.e., rows) where the difference between the capital spending for the F0221 RRA and the F2021 Forecast is greater than \$10 M and provide the following: i) a variance explanation and ii) whether the variance impacts the forecast F2022 RRA Transmission capital spending.
- 58.2 With respect to Table 6-12, please identify those Transmission spending categories (i.e., rows) where the difference between the capital additions for the F0221 RRA and the F2021 Forecast is greater than \$10 M and provide the following: i) a variance explanation and ii) whether the variance impacts the forecast F2022 RRA Transmission capital additions.

59.0 Reference: Exhibit B-2, pages 6-58 to 6-69 and Appendix I

- 59.1 Please identify any Distribution capital projects with total in-service cost greater than \$5 M that were not identified in the Previous Application's Appendix I (apart from those noted on pages 6-63) and where there is spending and/or capital additions for F2022 in the current Application's Appendix I.

60.0 Reference: Exhibit B-2, pages 6-58 to 6-59

- 60.1 With respect to Table 6-31, please identify those Distribution spending categories (i.e., rows) where the difference between the capital spending for the F0221 RRA and the F2021 Forecast is greater than \$10 M and provide the following: i) a variance explanation and ii) whether the variance impacts the forecast F2022 RRA Distribution capital spending.

- 60.2 With respect to Table 6-32, please identify those Distribution spending categories (i.e., rows) where the difference between the capital additions for the F0221 RRA and the F2021 Forecast is greater than \$10 M and provide the following: i) a variance explanation and ii) whether the variance impacts the forecast F2022 RRA Distribution capital additions.
- 61.0 Reference: Exhibit B-2, page 7-18 and Exhibit B-2-2, Appendix A, Schedule 2.1**
- 61.1 Why are there no F2020 Actual additions to the Load Variance Regulatory Account?
- 62.0 Reference: Exhibit B-2, pages 7-2 to 7-3 and Exhibit B-2-2, Appendix A, Schedule 2.1**
BC Hydro's 2020/21 Second Quarter Financial Report, page 8
<https://www.bchydro.com/content/dam/BCHydro/customer-portal/documents/corporate/accountability-reports/financial-reports/quarterly-reports/bchydro-f21-q2-report.pdf>
- 62.1 The Application states: "In fiscal 2020, actual Trade Income was \$13 million higher than the fiscal 2020 RRA Plan. BC Hydro deferred this favorable variance to the Trade Income Deferral Account to the benefit of ratepayers". However, Appendix A, Schedule 2.1 shows F2020 Actual additions to the Trade Income Deferral Account of (\$68.7) M. Please reconcile.
- 62.2 The Application states (pages 7-2 to 7-3): "In fiscal 2021, BC Hydro is not forecasting any variance to plan with respect to Trade Income and therefore has not forecast additions to the Trade Income Deferral Account". Why are there no forecast additions when both BC Hydro's F2020/21 First Quarter and Second Quarter Financial results show transfers to the account?
- 63.0 Reference: Exhibit B-2, pages 7-3 to 7-6**
- 63.1 In the interest of rate stability, was any consideration given to providing some flexibility in the determination of the DARR (e.g., by say 0.5 or 1.0 percentage points) in the event that the forecast rate increases (prior to the DARR) were either materially higher or lower than inflation?
- 63.1.1 If not, why not?
- 63.1.2 If yes, why was such an approach rejected?
- 64.0 Reference: Exhibit B-2, pages 7-8 to 7-10 and Exhibit B-2-2, Appendix A, Schedule 2.2**
- 64.1 Please provide a schedule that sets out annual dismantling costs for: i) F2020 RRA, ii) F2020 Actual, iii) F2021 RRA, iv) F2021 Forecast and v) F2022 Plan.
- 64.1.1 If the difference between (i) and (ii) does not equal the F2020 Actual additions to the Dismantling Cost Regulatory Account per Schedule 2.2, please explain why.

64.1.2 If the difference between (iii) and (iv) does not equal the F2021 Forecast additions to the Dismantling Cost Regulatory Account per Schedule 2.2, please explain why.

65.0 Reference: Exhibit B-2, pages 7-10 to 7-12 and Exhibit B-2-2, Appendix L

65.1 Appendix L (page 3) indicates that changes in cost or emerging technical issues can result in a leading alternative no longer being appropriate such that a new alternative is preferred and some or all of the costs to date may be impaired and required to be written off. Please explain why such costs are not viewed as part of the overall determination as to the best alternative for the project and therefore included in the overall project costs?

65.1.1 Alternatively, if they are to be written off why isn't it appropriate to write them off over the life of actual project/alternative selected?

66.0 Reference: Exhibit B-2, pages 7-12 to 7-14 and Exhibit B-2-2, Appendix A, Schedules 2.2 and 4.0

66.1 Does BC Hydro charge EV owners for the use of its charging stations?

66.1.1 If not, why not?

66.1.2 If yes, will the revenues received be also deferred to the Electric Vehicle Costs Regulatory Account?

66.2 How is the cost of energy related to electric vehicle charging stations determined (per Schedule 2.2 and 4.0)?

66.3 Please confirm that the operating costs, cost of energy and amortization related to electric vehicle charging stations are included in the F2022 revenue requirement.

66.3.1 Please provide a schedule setting out the F2022 forecast operating costs, cost of energy and amortization related to electric vehicle charging stations.

**67.0 Reference: Exhibit B-2, pages 7-12 to 7-14
Fortis BC's Application for Approval of Rate Design and
Rates for Electric Vehicle Fast Charging Service,
Exhibit B-5, page 17**

67.1 Does BC Hydro receive carbon credits related to its ownership/operation of electric vehicle charging stations?

67.1.1 If not, why not?

67.1.2 If not, what would be the value of such credits based on usage of its charging stations in each of F2020 Actual, F2021 Forecast and F2022 Plan using \$200 per tonne (per FBC's Application)?

67.1.3 If yes, what were/will be the amounts received for F2020 Actual, F2021 Forecast and F2022 Plan and has BC Hydro monetized all of the credits it has received?

67.1.4 If yes, is the value of such credits included in the Electric Vehicle Costs Regulatory Account as an offset to costs? If not included, please explain why. If included, please indicate where in Appendix A this occurs.

68.0 Reference: Exhibit B-2, page 8-6 and Exhibit B-2-2, Appendix A, Schedule 9.0

68.1 What would BC Hydro's forecast F2022 return on equity be (dollar value) if calculated based on a deemed equity of 30% and FEI's approved ROE for 2022?

69.0 Reference: Exhibit B-2, page 8-10 and Exhibit B-2-2, Appendix A, Schedule 15.0 & Appendix U, page 31 of 43

69.1 Appendix U states: "in its application to establish the pilot program, BC Hydro proposed that the net difference between the revenues collected under the Customer Crisis Fund Rate Rider and the incremental costs related to the Customer Crisis Fund pilot program in each fiscal year be transferred to the Customer Crisis Fund Regulatory Account." However, neither Table 8-6 nor Appendix A (Schedule 15.0) shows any transfer of such revenue to the Customer Crisis Fund Regulatory Account. Please reconcile.

70.0 Reference: Exhibit B-2, page 10-3 and Exhibit B-2-2, Appendix W, page 5

70.1 Please explain how the F2020 actual savings associated with the Transmission Service Rate were determined (per Appendix W).

70.2 Please provide a breakdown of the F2021 values set out in Table 10-2 similar to that provided for F2020 in Appendix W, Table 1.

71.0 Reference: Exhibit B-2, page 10-7

71.1 With respect to Table 10-7, please explain how the values for "BC Hydro Allocation of DSM for cost recovery purposes" were determined.

72.0 Reference: Exhibit B-2-2, Appendix X, pages 22-23

72.1 For each of the rows in Table 5 please provide either: i) a reference as to where a description of the Project/Program/Contract/Expenditure can be found or ii) provide one.

72.2 With respect to Table 5 and those Projects/Programs/Contracts/Expenditures that have an "n/a" designation under Cost Effectiveness, please identify those where: i) the nature of the project, study or program, is such that requested information cannot be obtained versus ii) the project, study, or program are prescribed by sections 4(3)(c) and 4(3)(d) of the GGRR and thus the cost-effectiveness test does not apply.

72.2.1 For those classified per item (i), please explain why the requested information cannot be provided.

72.3 With respect to Table 5, Row 10, please explain the basis of the \$8.2 M NPV value when there is no additional energy or demand attributed to the project.

73.0 Reference: Exhibit B-2, page 10-10 and Exhibit B-2-2, Appendix M, pages 2 to 19

73.1 Please provide a schedule that for the Residential Programs sets out by program the expenditures and incremental savings for: i) F2020 RRA, ii) F2020 Actual, iii) F2021 RRA, iv) F2021 Forecast and v) F2022 RRA.

73.2 Are there any planned changes for F2022 to any of the Residential programs in terms of program scope or delivery? If so, please outline what they are.

74.0 Reference: Exhibit B-2-2, Appendix X, Table 5 and Appendix N, Table N-4

74.1 Are Projects 1, Project 2 and Project 3 in Table 5 the same projects as in Table N-4?

74.1.1 If not, what are the differences?

74.1.2 If yes, why does Table N-4 report Cost Effectiveness results for Projects 1 and 2, whereas Table 5 does not?

75.0 Reference: Exhibit B-2, pages 10-9 to 10-10 & 10-14 and Exhibit B-2-2, Appendix N, pages 5 to 8 & 10

75.1 Table N-4 reports as value for BCH's LCE Program of \$15.6 M, while Table N-3 reports a value of \$9.52 M. What accounts for the difference, i.e., does the value in Table N-4 assume additional spending beyond F2022?