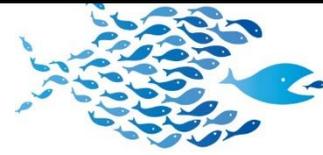


25 May 2021

VIA E-FILING

Patrick Wruck
Commission Secretary
BC Utilities Commission
6th Floor 900 Howe Street
Vancouver, BC V6Z 2N3



BCPIAC
Public Interest Advocacy Centre

Reply to: Leigha Worth
ED@bcpiac.org
Ph: 604-687-3034
Our File: 7500.623

Dear Mr. Wruck,

**Re: British Columbia Hydro and Power Authority (BC Hydro) Public Electric Vehicle (EV) Fast Charging Rate Application
BCOAPO Submission on Further Process**

Please be advised that we continue to represent the BC Old Age Pensioners' Organization, Active Support Against Poverty, Council of Senior Citizens' Organizations of BC, Disability Alliance BC, Tenant Resource and Advisory Centre, and Together Against Poverty Society, known collectively in this process as "BCOAPO et al.". Our clients are community-based organizations that serve a diverse group of more than 100,000 British Columbians throughout the province, including those living in BC Hydro's service area.

In this submission, we offer BCOAPO's position on further process with respect to the above-noted matter in compliance with BCUC Order G-89-21. We take this position based on counsels' and our expert consultant's assessments of the scope and completeness of the necessary evidence currently on the record along with an assessment of the importance of the application's subject matter to our clients and the public interests before engaging in a comparison of the cost-benefit analyses of all process formats to find what we believe is the most cost-effective process.

In this case, we have identified a number of issues that we submit require additional evidentiary support in order for the Commission Panel, the public, and interveners in this process to properly assess the Application's merits including, but not limited to:

- The basis or rationale BCH used to arrive at the proposed rate levels;
- The need to reconcile the proposed pricing differentials for the 25 kW, 50 kW, and 100 kW charging services;
- The basis(es) upon which these pricing differentials were determined to be appropriate;
- The need for additional information regarding BCH's rationale and plans to address the under-recovery in cost recovery over the short term and to achieve full cost recovery over the longer term; and
- The need for clarification regarding the costs included in the three pricing scenarios (as per Exhibit B-1, Table 3).

As a result of our assessment of the state of the record on these and other issues, we submit that a second round of IR's are necessary in order to proceed. As for how this process might conclude

after a second round, provided BC Hydro's answers are fulsome and responsive and do not reveal any highly controversial information, we see no need to proceed to an oral hearing or oral submissions on this matter and, subject to the conditions cited above, we submit written final arguments would be appropriate.

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