

Fred James

Chief Regulatory Officer

Phone: 604-623-4046

Fax: 604-623-4407

bchydroregulatorygroup@bchydro.com

January 22, 2019

Mr. Patrick Wruck
Commission Secretary and Manager
Regulatory Support
British Columbia Utilities Commission
Suite 410, 900 Howe Street
Vancouver, BC V6Z 2N3

Dear Mr. Wruck:

RE: Project No. 3698877
British Columbia Utilities Commission (BCUC or Commission)
British Columbia Hydro and Power Authority (BC Hydro)
Review of the Regulatory Oversight of Capital Expenditures and Projects
Rebuttal Evidence Extension Request

BC Hydro writes to request an extension for filing its Rebuttal Evidence to February 15, 2019, and propose adjustment to the timing of process steps in the proceeding to align with the planned filing of BC Hydro's Fiscal 2020 to Fiscal 2021 Revenue Requirements and Rates Application (**F2020-F2021 RRA**).

Request for Extension for Filing Rebuttal Evidence

BC Hydro is preparing its Rebuttal Evidence to the intervenor evidence filed by the Commercial Energy Consumer's Association of B.C. (**CEC**), but will be unable to meet the current deadline of January 25, 2019. To a large extent, the resources required to prepare the Rebuttal Evidence are the same as those needed to prepare the F2020-F2021 RRA, which is a time-intensive process. In addition, many of BC Hydro's resources involved in this proceeding are also supporting the Supply Chain Applications Project and the Reliability Coordinator Application both currently before the Commission. While we have been diligently seeking to meet the current deadline for the filing of Rebuttal Evidence, at this time we have concluded that we will be unable to finalize the Rebuttal Evidence with the required level of internal review and approval by January 25, 2019. We are therefore requesting an extension until February 15, 2019 to file Rebuttal Evidence.

In BC Hydro's view, the requested extension may be helpful to the participant in this proceeding. In the F2020-F2021 RRA BC Hydro will be implementing its proposals set out in its Revised Proposal filed as Exhibit B-7. We therefore believe it would be beneficial for participants to be able to see BC Hydro's F2020-F2021 RRA before issuing information requests (**IR**) on BC Hydro's Revised Proposal. As further discussed below, the requested delay will afford participants that opportunity in this proceeding.

Request for Change in Timing of Process Steps to Reflect Filing of the F2020-F2021 RRA

BC Hydro believes it would be beneficial to adjust the future process steps in this proceeding until after BC Hydro has filed its F2020-F2021 RRA for the following reasons:

1. BC Hydro proposed several additions and adjustments in its Revised Proposal to the information that BC Hydro would file in its revenue requirement applications. This included, for example, documents summarizing BC Hydro's strategies and plans. In the F2020-F2021 RRA to be filed in February, BC Hydro will be including this information. In BC Hydro's view, it will be beneficial for participants to see the F2020-F2021 RRA and how BC Hydro has implemented its proposals before asking IRs on the Revised Proposal.
2. CEC's intervener evidence critiques the information filed in BC Hydro's F2017 to F2019 Revenue Requirements and Rates Application. Without commenting on the accuracy of those critiques, the information will all be updated in BC Hydro's F2020-F2021 RRA. We therefore believe it would be helpful for the F2020-F2021 RRA to be on the record for reference in this proceeding and would effectively form part of BC Hydro's Rebuttal Evidence to the CEC.
3. Finally, the proposed dates ensure that there will be minimal overlap with the process to review the F2020-F2021 RRA, allowing for staggered review processes.

Given the above considerations, BC Hydro proposes the following regulatory process dates. BC Hydro notes that the proposed process steps are informed by consultation with Commission staff.

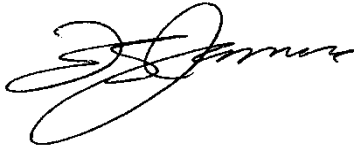
Process	Date
BC Hydro to File Rebuttal Evidence	February 15, 2019
BCUC and Intervener IRs on BC Hydro Revised Proposal and Rebuttal Evidence	March 8, 2019
BC Hydro Responses to IRs on BC Hydro Revised Proposal and Rebuttal Evidence	March 29, 2019
BC Hydro Final Argument	April 12, 2019
Intervener Final Argument	April 26, 2019
BC Hydro Reply Argument	May 10, 2019

BC Hydro appreciates the Commission's consideration of the revised Regulatory Agenda.

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Commission Secretary and Manager
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British Columbia Utilities Commission
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Rebuttal Evidence Extension Request

For further information, please contact Geoff Higgins at 604-623-4121 or by email at bchydroregulatorygroup@bchydro.com.

Yours sincerely,



Fred James
Chief Regulatory Officer

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