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July 2, 2020

Ms. Marija Tresoglavic
Acting Commission Secretary and Manager
Regulatory Support
British Columbia Utilities Commission
Suite 410, 900 Howe Street
Vancouver, BC V6Z 2N3

Dear Ms. Tresoglavic:

**RE: British Columbia Utilities Commission (BCUC or Commission)
British Columbia Hydro and Power Authority (BC Hydro)
2021 Integrated Resource Plan**

I am writing in response to your letter of June 19, 2020 with regard to the filing date for BC Hydro's 2021 Integrated Resource Plan (IRP).

The development of the 2021 IRP is well underway. BC Hydro appreciates the BCUC's interest and active participation in the 2021 IRP and agrees with the BCUC on the importance of a timely filing that provides insight into BC Hydro's planning priorities to inform the review of future regulatory applications.

During the Oral Hearing for BC Hydro's Fiscal 2020 to Fiscal 2021 Revenue Requirements Application, BC Hydro stated that it expected to file the 2021 IRP in February 2021,¹ however, the COVID-19 pandemic and its implications on load and the timing of the release of the Final Report on the Phase 2 of the Comprehensive Review of BC Hydro have delayed this schedule and have implications for BC Hydro's consultation plans.

On June 23, 2020, the Government of B.C. tabled legislation that will have a material impact on the 2021 IRP, namely the repeal of the self-sufficiency requirement and the inclusion of a 100 per cent clean delivery standard. This is an important development because BC Hydro was unable to engage with Indigenous Nations, our customers and the public on these changes prior to legislation being tabled. Now that the legislation has been tabled, BC Hydro can move forward with consultation on these matters.

Currently, Phase 1 of the IRP planning process, development of inputs and initial consultation materials, is almost complete. That work includes updates to the

¹ Fiscal 2020 to Fiscal 2021 Revenue Requirements Application, Transcript Volume 5, Page 425.

March 2020 Load Forecast to account for the potential impact of the COVID-19 pandemic and ongoing consultation with the Technical Advisory Committee. Phase 2, which consists of conducting analysis, preparing an updated December 2020 Load Forecast, engaging in initial consultation with Indigenous Nations, our customers and the public and ultimately drafting the plan, will begin in July 2020 and conclude with the public release of the draft 2021 IRP in early March 2021.

Following the public release of the draft IRP in early March 2021, BC Hydro is planning to undertake a further three months of consultation. This would include the BCUC staff as well as Indigenous Nations, the Technical Advisory Committee, the Government of B.C., our customers and the public. BC Hydro will then consider and incorporate feedback received to produce the final 2021 IRP for filing with the BCUC no later than September 2021.

BC Hydro would welcome the opportunity to meet with BCUC staff to discuss this schedule, including our plans for consultation as well as opportunities for BCUC involvement throughout the process and particularly during the time between the release of the draft IRP in early March 2021 and the filing of the final IRP in September 2021, which may help to address any concerns with regard to the filing date.

In BC Hydro's view, our planned schedule is reasonable, considering developments with regard to Phase 2 of the Comprehensive Review and the COVID-19 pandemic, and more importantly, it ensures that adequate consultation can be conducted with Indigenous Nations and key stakeholder groups. The importance of stakeholder consultation is reflected in section 8 of the BCUC's *Resource Planning Guidelines*.

BC Hydro notes that section 44.1(2.1) of the *Utilities Commission Act* sets February 28, 2021 as the earliest date that BC Hydro may be directed to file an IRP. If the BCUC decides to consider exercising its powers to direct a specific filing deadline, BC Hydro submits that it would be appropriate to offer BC Hydro and interested stakeholders the opportunity to make submissions prior to any decision.

I hope that this information is helpful. My office will follow up with BCUC staff to schedule a meeting including myself, Fred James (Chief Regulatory Officer) and Bill Clendinning (Director, Energy Planning and Analytics), to discuss further.

Yours sincerely,



Maureen Daschuk
Senior Vice President, Integrated Planning