

Fred James

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September 19, 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. 1599008

British Columbia Utilities Commission (BCUC or Commission)

British Columbia Hydro and Power Authority (BC Hydro)

City of Coquitlam (City) Application for Reconsideration and Variance of

Order G-80-19 - BC Hydro's Submission on Further Process

BC Hydro writes in response to Commission Order G-221-19 dated September 11, 2019 (Exhibit A-5), in which the Commission requested that the City and interveners provide submissions on the proposed process in accordance with the regulatory timetable attached as Appendix A to the Order. In particular, the Commission asked for the submissions to address:

- Whether the proceeding should advance to written final arguments, or if some other process is warranted; and
- The proposed timetable for the remaining regulatory process.

The City filed its submission on September 16, 2019 (Exhibit B-4), in which it, among other things:

- Submitted that the proceeding should advance to final arguments;¹
- Suggested that the Commission Panel set out questions for the parties to address in their written argument;
- Stated that it would be pleased to participate in an oral argument phase if the Commission Panel would find oral arguments helpful; and
- Suggested a timetable for the steps that it proposed.

Subject to the potential need for new evidence regarding the cost allocation methodology for the removal of the decommissioned NPS 20 Pipeline being adjourned, pending a determination on the Commission's jurisdiction under section 32 of the *Utilities Commission Act*, as outlined in the Application.

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Commission Secretary and Manager
Regulatory Support
British Columbia Utilities Commission
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Page 2 of 2

BC Hydro agrees that the proceeding should now advance to written final arguments. BC Hydro also agrees that, if the Commission Panel has specific questions for the parties about the issues in this proceeding, then it would be useful if the Commission Panel sets out those questions for the parties in advance of the written argument phase.

BC Hydro would participate in an oral argument phase if the Commission Panel would find oral arguments helpful; however, in BC Hydro's view, written arguments should be satisfactory given the subject matter of this proceeding, and particularly if the Commission Panel sets out questions in advance of written argument.

BC Hydro has reviewed the City's proposed timetable and believes that it is reasonable.

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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