

Fred James

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December 18, 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:

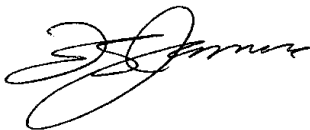
**RE: British Columbia Utilities Commission (BCUC or Commission)
British Columbia Hydro and Power Authority (BC Hydro)
City of Coquitlam (City) Application for Reconsideration and Variance of
Order G-80-19**

BC Hydro writes to provide its final argument in this proceeding in accordance with the timetable established in BCUC Order No. G-289-20.

In this the final phase of the reconsideration proceeding, BC Hydro does not take a position on how the costs to remove any portion of the decommissioned NPS 20 Pipeline should be allocated between the City and FortisBC Energy Inc., if the removal is requested by the City in circumstances where the NPS 20 Pipeline interferes with municipal infrastructure.

However, in BC Hydro's view and as discussed in our argument for the first phase of this proceeding,¹ an order specifying the allocation of costs for the removal of equipment should generally be made at the time of a request to remove the equipment in the case where there is no operating agreement between the parties. Any such order in that case should depend on the circumstances at that time, such as the reason for why the equipment must be removed and whether there are any alternatives.

Yours sincerely,



Fred James
Chief Regulatory Officer

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¹ BC Hydro's argument at page 13.