

Fred James

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October 8, 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: Project No. 1599117
British Columbia Utilities Commission (BCUC or Commission)
British Columbia Hydro and Power Authority (BC Hydro)
Long-Term Resource Plan Filing Date

BC Hydro writes to respond to intervener submissions with regard to BC Hydro's request to suspend this proceeding until 30 days after a government has been sworn-in and a Cabinet has been appointed.

Most intervener submissions accept or support BC Hydro's request to suspend the proceeding. BCSEA "sees no realistic alternative"¹ and MOVEUP submits that the request is "reasonable and realistic"². CEC considers that it is "potentially wasteful to establish a significant direction based on limited engagement, when government direction could change course as a result of the election"³ and supports BC Hydro's request. Mr. Ince supports BC Hydro's request and submits that it would be "inefficient and wasteful for BC Hydro to issue IRP recommendations based on limited engagement, and potentially have to reverse course due to nascent government policy input"⁴. SurplusEnergy agrees with BC Hydro's request.⁵ Ms. Gjoshe takes no position on BC Hydro's request to suspend the proceeding but submits that the BCUC should consider a staged process for the review of BC Hydro's 2021 IRP.⁶ BC Hydro relies on its previous statements, as set out in section C of Exhibit B-3, in response to Ms. Gjoshe's submission.

¹ Exhibit C1-3

² Exhibit C3-3

³ Exhibit C6-3, page 2.

⁴ Exhibit C8-3.

⁵ Exhibit C11-2.

⁶ Exhibit C9-3.

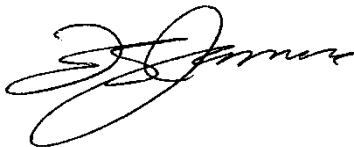
While CEABC and BCCSC do not support BC Hydro's request, it appears that they have misinterpreted what BC Hydro is asking for. CEABC states that "BC Hydro's IRP consultation process... must be immediately recommenced on October 26, 2020. Not, as suggested by BC Hydro, 30 days after the government has been sworn-in and a Cabinet has been appointed."⁷ BCCSC states that it "does not support a delay in public consultation"⁸.

These submissions misstate BC Hydro's request and the purpose of this proceeding. As set out in Exhibit A-2, the purpose of this proceeding is to conduct a review of the filing date for BC Hydro's 2021 Integrated Resource Plan (**IRP**). BC Hydro has not requested, and it would not be appropriate for this proceeding to provide, any direction with regard to the timing of BC Hydro's engagement efforts to develop the 2021 IRP. Rather, BC Hydro has requested that this proceeding, established to review the filing date for the 2021 IRP, be suspended until BC Hydro is in a position to submit a proposed IRP schedule and filing date for the BCUC to consider that is informed by any expectations a new government may have.

Granting BC Hydro's request would not have any necessary implications on the timing or nature of BC Hydro's engagement efforts or the 2021 IRP filing date. Instead, granting BC Hydro's request would simply allow BC Hydro's submissions on the filing date to be informed by the views of a new government.

For further information, please contact Chris Sandve at 604-974-4641 or by email at bchydroregulatorygroup@bchydro.com.

Yours sincerely,



Fred James
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⁷ Exhibit C2-3, page 1.

⁸ Exhibit C7-3.