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January 18, 2021

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 provide its reply to intervener submissions in accordance with BCUC Order No. G-300-20.

In Exhibit B-7, BC Hydro stated that it expects to file the 2021 Integrated Resource Plan (2021 IRP) in December 2021. BCSEA,¹ CEABC,² MOVEUP,³ CEC,⁴ BCOAPO⁵ and SurplusEnergy⁶ all made submissions accepting or supporting a December 2021 filing date for the 2021 IRP.

AMPC does not support the December 2021 filing date and provides reasons for its position.⁷ BC Hydro response to these reasons is provided below.

AMPC states that the three-month shift of the 2021 IRP filing date from September 2021 to December 2021 does not align with the one-month period of the provincial election blackout from September 21 to October 24, 2020. In Exhibit B-7, BC Hydro provided a detailed update on the re-start of consultation activities following the provincial election

¹ Exhibit C1-4.

² Exhibit C2-4. BC Hydro notes that CEABC's acceptance is conditional on the establishment, as proposed by the BCSEA, of a process to determine whether the 2021 IRP should include long-term BC Hydro plans and targets for low-carbon electrification.

³ Exhibit C3-4.

⁴ Exhibit C6-4.

⁵ Exhibit C10-2.

⁶ Exhibit C11-3.

⁷ Exhibit C5-3.

period, explaining the associated timing impact and confirming that the 2021 IRP timeline is the same as in BC Hydro's original submission (Exhibit B-2), except that the tasks and phases have shifted to account for the delay of consultation activities as a result of the provincial election campaign.

AMPC states that the governing party was re-elected and the Minister responsible for BC Hydro has not changed. As explained further in Exhibit B-7, it was important to know the results of the election before re-starting consultation activities because a change in government could have led to a change in policy direction, requiring BC Hydro to adjust its approach to consultation on the 2021 IRP. However, once there was certainty on the outcome of the election, BC Hydro issued notifications to re-schedule consultation meetings.

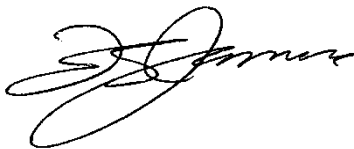
AMPC states that it is not persuaded that BC Hydro cannot modify its timeline to fulfill its scheduled activities. To maintain a September 2021 filing date, BC Hydro would need to significantly curtail the opportunity for follow-up consultation on the draft IRP with Indigenous Nations, the Technical Advisory Committee and customers before filing the IRP with the BCUC. It would also limit the time to incorporate feedback on the draft IRP into the final IRP before we file it. In BC Hydro's submission, this particular phase of the consultation process – receiving and reflecting feedback on the draft IRP in the final IRP that is submitted to the BCUC – is the most important and should not be curtailed.

Lastly, AMPC emphasizes the importance of long-term planning and prioritizing the development of the 2021 IRP. BC Hydro agrees with AMPC on these points and recognizes that the 2021 IRP timeline is being filed later than originally anticipated as a result of the impacts of the COVID-19 pandemic and the provincial election campaign. BC Hydro shares AMPC's desire to file the 2021 IRP as soon as possible; however, in BC Hydro's submission, the consequences of curtailing consultation on the draft IRP before filing it with the BCUC are significant and could lead to a longer and more contentious regulatory process.

Overall, BC Hydro submits that the necessity for adequate consultation prior to filing the 2021 IRP far outweighs the desire to reduce BC Hydro's proposed IRP timeline to make up for the schedule impact of uncontrollable events.

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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Enclosure