

Fred James

Chief Regulatory Officer

Phone: 604-623-4046

Fax: 604-623-4407

bchydroregulatorygroup@bchydro.com

September 17, 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
Reply to Intervener Submission

BC Hydro writes in accordance with BCUC Order No. G-205-20 to provide its reply submissions on a filing date for BC Hydro's next long-term resource plan, referred to as the 2021 Integrated Resource Plan (**2021 IRP**), and a proposal for an interim filing of BC Hydro's current planning context to aid in the review of BC Hydro applications filed prior to the BCUC's review of the 2021 IRP.

A. 2021 IRP Filing Date

Notably, all interveners accept or do not oppose BC Hydro's proposal of a September 2021 filing date for the 2021 IRP:

- The BC Sustainable Energy Association (**BCSEA**) states that it can accept a September 2021 filing date but "suggests that this should be a firm deadline."¹
- The Clean Energy Association of BC (**CEABC**) agrees with BCSEA's submission on the filing date.²
- The Movement of United Professionals (**MOVEUP**) submits that BC Hydro's proposed timing "makes sense under the circumstances."³

¹ Exhibit C1-2, page 2.

² Exhibit C2-2, page 3.

³ Exhibit C3-2, page 2.

- Coastal First Nations (**CFN**) suggests a two-phase approach, which BC Hydro addresses further below, with the second and final filing in September 2021.⁴
- The Association of Major Power Customers (**AMPC**) supports BC Hydro's proposed filing date.⁵
- The Commercial Energy Consumers (**CEC**) accepts BC Hydro's proposed schedule as appropriate given the significant uncertainty that has arisen with Covid-19.⁶
- The BC Community Solar Coalition (**BCCSC**) provides conditional support to the proposed September 2021 filing date.⁷
- Mr. Ince encourages BC Hydro to submit an IRP that is not rushed, provided it "does not produce near-term consequences with respect to the approval and implementation of BC Hydro initiatives and expenditures...".⁸
- Ms. Gjoshe did not make a specific submission with regard to the IRP filing date.⁹
- The BC Old Age Pensioners' Organization (**BCOAPO**) adopts the submissions of AMPC and MOVEUP.¹⁰

In light of these intervener submissions, BC Hydro has no reply submissions regarding its proposal to file its 2021 IRP, pursuant to section 44.1 (2) of the *Utilities Commission Act* (UCA), in September 2021.

B. Interim Filing on BC Hydro's Current Planning Context

In its August 20, 2020 submission,¹¹ BC Hydro proposed a two-stage filing consisting of:

- Planning inputs, including a draft load-resource balance, reflecting BC Hydro's March 2020 Load Forecast with scenarios to account for the potential impact of the COVID-19 pandemic over the next three years, in October 2020; and
- A draft IRP, reflecting BC Hydro's December 2020 Load Forecast, in spring 2021.

⁴ Exhibit C4-2, page 5.

⁵ Exhibit C5-2, page 1.

⁶ Exhibit C6-2, page 1.

⁷ Exhibit C7-2, page 1.

⁸ Exhibit C8-2, page 4.

⁹ Exhibit C9-2.

¹⁰ Exhibit C10-2, page 1.

¹¹ Exhibit B-2.

Both of these filings would be for information purposes, and would not initiate a BCUC proceeding.

- MOVEUP, AMPC, CEC and BCOAPO expressly accept BC Hydro's proposal.¹²
- BCSEA implicitly accepts BC Hydro's proposal.¹³
- BCCSC makes no submissions on the interim filing proposal.¹⁴
- Mr. Ince agrees "overall" with BC Hydro's interim proposal, but also suggests that the October 2020 filing of initial key inputs might be premature.¹⁵
- CFN,¹⁶ CEABC¹⁷ and Ms. Gjoshe¹⁸ propose or support alternatives to BC Hydro's two-stage interim filing proposal, which are addressed further below.

C. Alternate Two-Stage Filing Proposals

Each of the CFN, CEABC and Ms. Gjoshe propose alternatives to BC Hydro's two-stage interim filing proposal. While different in scope and particulars, these proposals seem to have two elements in common:

- An interim filing in spring 2021 that includes the December 2020 Load Forecast; and
- initiating a BCUC review of the spring 2021 interim filing.

Under BC Hydro's proposal, the March 2020 Load Forecast with scenarios to account for the potential impact of the COVID-19 pandemic over the next three years, would be included as part of the draft load-resource balance filed in the October 2020 key inputs filing. The December 2020 Load Forecast would be included as part of the draft 2021 IRP filed in spring 2021. Both the key inputs filing and the draft IRP filing would be for information purposes only but the content would be the subject of consultation as BC Hydro develops its IRP to submit to the BCUC under section 44.1(2) of the UCA in September 2021.

While BC Hydro supports filing the December 2020 Load Forecast with the BCUC in spring 2021 for information purposes as part of the draft IRP, BC Hydro is opposed to a BCUC review of the spring 2021 interim filing, as proposed by CFN, CEABC and Ms. Gjoshe, for the following reasons:

¹² Exhibit C3-2, page 2; Exhibit C5-2, page 1; Exhibit C6-2, page 1; Exhibit C10-2, page 1.

¹³ Exhibit C1-2, page 2.

¹⁴ Exhibit C7-2

¹⁵ Exhibit C8-2, page 3.

¹⁶ Exhibit C4-2, page 2

¹⁷ Exhibit C2-2.

¹⁸ Exhibit C9-2, pages 2-3.

First, over the spring and summer of 2021, BC Hydro's resources must be focused on conducting consultation on the draft IRP and moving from a draft IRP to a final IRP ready for filing under section 44.1 of the UCA. This work is important and as Mr. Ince points out, the "complexity, workload [and] consultation requirements" imposed on the organization in the development of an IRP are quite significant.¹⁹ If the BCUC were to initiate a review of the spring 2021 interim filing, BC Hydro resources would be drawn away from these efforts, compromising either the consultation process or the September 2021 filing date.

Second, the draft IRP that BC Hydro would file as its interim filing in spring 2021 would be approved by BC Hydro's Executive Team and Board of Directors for consultation purposes only. It would not be BC Hydro's final IRP and accordingly, it would not be filed under section 44.1(2) of the UCA, and would not be subject to any BCUC orders regarding its public interest or otherwise. This has important implications with regard to CFN's suggestion that the interim filing include a DSM Plan and a forecast of load after DSM. While BC Hydro can include this information on the basis of its draft IRP, it would not represent an approved DSM Plan that would be amenable to BCUC review under the DSM-approval sections of the UCA (i.e., section 44.2(1)(a)).

Third, the BCUC would not be able to issue any lawful decisions or orders as a result of such a review. For example, with regard to the December 2020 Load Forecast, the BCUC has no power to determine whether a load forecast is in the public interest, as it can with the IRP itself; it has no power to determine a load forecast, as it can with rate design proposals; and it cannot permit a load forecast, as it can with a discontinuance application.

Accordingly, for all of the reasons set out above, BC Hydro submits that the spring 2021 interim filing should be for information purposes only and should not initiate a review by the BCUC.

D. BCSEA Proposal for Process on the Inclusion of Electrification Plans and Targets in 2021 IRP

BCSEA argues that BC Hydro's proposed October 2020 interim filing of key IRP inputs should also initiate a process to determine whether the 2021 IRP should include "long-term plans and targets for low-carbon electrification."²⁰ CEABC seems to agree with BCSEA's proposal.²¹

BC Hydro agrees that the BCUC should initiate a process to determine whether the IRP should include "long-term plans and targets for low-carbon electrification". It would be

¹⁹ Exhibit C8-2, page 1.

²⁰ Exhibit C1-2, pages 2-3.

²¹ Exhibit C2-2, page 3.

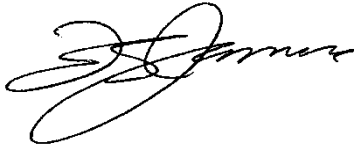
useful to have the BCUC hear and rule on this issue prior to BC Hydro filing its 2021 IRP in September 2021.

BC Hydro's initial submissions on this issue should not be combined with the October filing of key inputs but can be made concurrently, as a separate filing. This is because the October filing of key inputs would be for information purposes only while submissions on whether the 2021 IRP should include "long-term plans and targets for low-carbon electrification" would be subject to a BCUC process and decision.

BC Hydro makes no submissions at this time on the jurisdiction or merits of a requirement that BC Hydro's 2021 IRP include "long-term plans and targets for low-carbon electrification". Assuming the BCUC agrees with the BCSEA proposal for a process to review this issue, BC Hydro would make its submissions on this issue at the same time as its October 2020 key inputs filing.

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

Yours sincerely,



Fred James
Chief Regulatory Officer

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