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November 10, 2025

Registrar
British Columbia Utilities Commission
Suite 410, 900 Howe Street
Vancouver, BC V6Z 2N3

Dear Keshni Nand:

RE: British Columbia Utilities Commission (BCUC or Commission)
British Columbia Hydro and Power Authority (BC Hydro)
West End Substation Project (Initial Application)

BC Hydro is filing this initial application (**Initial Application**) to advise that we will be filing our Application for a Certificate of Public Convenience and Necessity for the West End Substation Project on December 16, 2025 (**Application**) and to propose a regulatory process for the review of the Application.

BC Hydro is requesting that the BCUC establish a regulatory timetable for the proceeding to facilitate a decision on the Application by October 30, 2026. A decision by October 30, 2026, would provide BC Hydro with an opportunity to advance the start of construction by approximately 12 months to November 2026, which is expected to result in an earlier expected in-service date of July 2032 and cost savings.

Pursuant to BCUC Rule 11.01, BC Hydro discloses that generative artificial intelligence, including Microsoft Copilot, was used in the preparation of portions of this submission. We confirm that individuals have reviewed all content to ensure its accuracy prior to submission.

For further information, please contact Bridget McNulty at bchydroregulatorygroup@bchydro.com.

Yours sincerely,

Chris Sandve
Chief Regulatory Officer

lj/tl

Enclosure

BC Hydro West End Substation Project

Initial Application

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1 Introduction

British Columbia Hydro and Power Authority (**BC Hydro**) is filing this initial application (**Initial Application**) to request that the British Columbia Utilities Commission (**BCUC**) establish a regulatory timetable for a proceeding to review BC Hydro's upcoming December 2025 application (**Application**) for a Certificate of Public Convenience and Necessity (**CPCN**) for the West End Substation Project (**Project**), pursuant to sections 45 and 46 of the *Utilities Commission Act* (**UCA**). BC Hydro is requesting that the regulatory timetable be set to facilitate a decision on the Application by October 30, 2026.

The Project is for the construction of a new underground substation located at the Lord Roberts Annex property at 1150 Nelson Street in Vancouver (**West End Substation**). Constructing a new substation in the West End area of Downtown Vancouver is the only feasible alternative to address the issues identified in the Downtown Vancouver Electricity Supply System, including seismic concerns, lack of capacity to meet future load growth, need to support the voltage conversion of the distribution system from 12 kV to 25 kV, and issues related to both aging assets and elevated safety risks at Murrin and Dal Grauer Substations and within the 12 kV dual-radial distribution system.

The purpose of this Initial Application is to commence the regulatory process to facilitate a decision on the Application by October 30, 2026. A decision by October 30, 2026, would provide BC Hydro with an opportunity to advance the start of construction by approximately one year to November 2026, which is expected to result in an earlier expected in-service date of July 2032 and cost savings. This Initial Application is structured as follows:

- Section 2 provides an overview of the Project, including a summary of the Downtown Vancouver Electricity Supply System, the development of the Downtown Vancouver Electricity Supply Plan, the need for the Project and the alternatives considered, the Project description, and First Nations consultation and public engagement to date; and

- Section 3 describes the proposed regulatory process, a summary of the proposed Application stages and content, and the final orders sought.

This Initial Application does not seek decisions on substantive issues. Rather, its purpose is to allow the Commission to establish a regulatory timetable and initiate public notice and intervener registration. As outlined in Section 3 below, BC Hydro proposes to submit a full application to the BCUC in three stages.

2 Project Overview

This section provides an overview of the Project including summaries of the Downtown Vancouver Electricity Supply System, the Downtown Vancouver Electricity Supply Plan, the Project need and alternatives, the Project description, as well as First Nations consultation and public engagement to-date.

2.1 Overview of the Downtown Vancouver Electricity Supply System

The Downtown Vancouver Electricity Supply System comprises transmission, substation, and distribution assets that together supply customers in the Downtown Vancouver area (**Study Area**),[1] as shown in Figure 1 and Figure 2 and below. The existing system consists of three substations, five 230 kV and four 60 kV transmission cable circuits, and a 12 kV distribution system. The three BC Hydro substations in the area are Dal Grauer Substation, Murrin Substation, and Cathedral Square Substation. The Murrin and Cathedral Square Substations are directly connected to the 230 kV transmission system, and the Dal Grauer Substation is

[1] The Study Area is defined as Vancouver's downtown peninsula together with the area east of the peninsula as far as Nanaimo Street with a southern boundary that follows Great Northern Way to Glen Drive, Broadway to Victoria Drive, and North Grandview Highway to Nanaimo Street. The Study Area includes four City of Vancouver neighbourhoods: Downtown, West End, Strathcona, and Grandview-Woodland.

radially supplied by four 60 kV cable circuits from Murrin Substation where the voltage is stepped down from 230 kV to 60 kV.

To the south of the Study Area is the Mount Pleasant Substation, a 230 kV to 12 kV, 150 MVA substation constructed in 2014. Mount Pleasant Substation was designed to allow for future expansion up to a total capacity of 400 MVA and for conversion to 25 kV. Two 230 kV transmission lines connect Mount Pleasant Substation to Cathedral Square Substation and Sperling Substation.

Figure 1 below outlines the Study Area supplied by the Downtown Vancouver Electricity Supply System, and Figure 2 below provides an overview of the transmission, substation, and distribution assets in the Downtown Vancouver Electricity Supply System.

Figure 1 Downtown Vancouver Electricity Supply Study Area

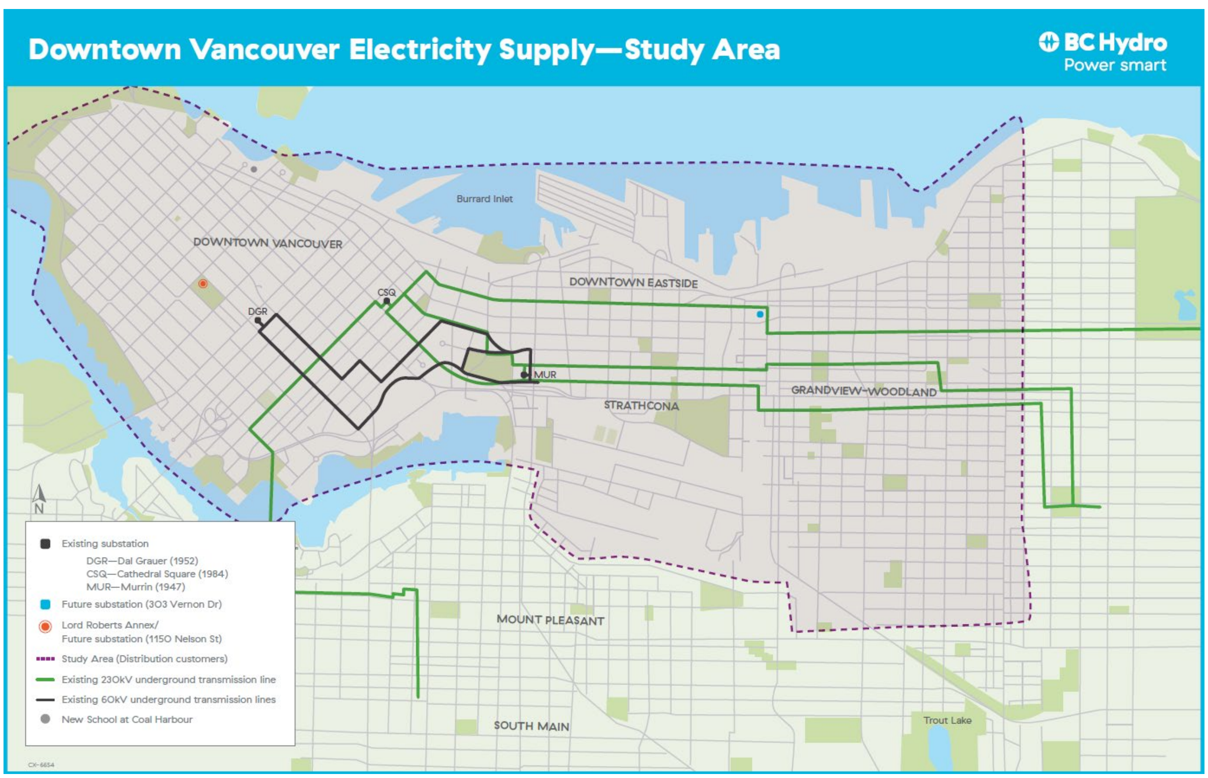
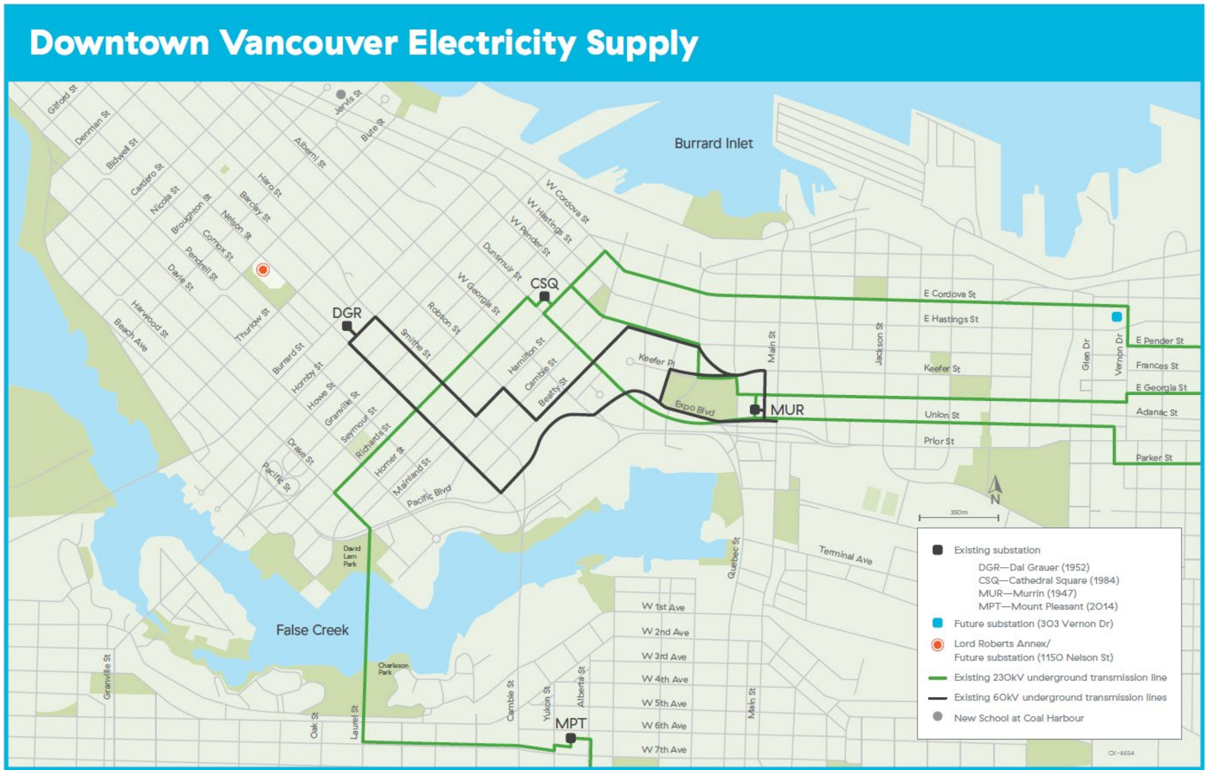


Figure 2 Overview of the Downtown Vancouver Electricity Supply System



2.2 Overview of the Downtown Vancouver Electricity Supply Plan and System Needs

In 2025, BC Hydro updated and finalized the Downtown Vancouver Electricity Supply Plan (**DVES Plan**) which identified system constraints and other issues that need to be addressed in the Downtown Vancouver Electricity Supply System over the next 20 years from fiscal 2022 to fiscal 2041. The DVES Plan identified the following issues in the Study Area, which are discussed further in the sub-sections below:

- Seismic concerns;
- Lack of capacity for load growth;
- Need to complete the voltage conversion of the distribution system;
- Aging assets; and

- Elevated safety risks.

2.2.1 Seismic Concerns

Most of the Murrin Substation site is located on seismically unstable ground with eight underground transmission circuits traversing seismically unstable soil.[2] These transmission circuits include the four 60 kV transmission lines that radially supply Dal Grauer Substation. In a large seismic event, Murrin Substation and these underground transmission circuits could be damaged and up to two thirds of downtown customers, including all customers served by Dal Grauer Substation, could experience a lengthy outage. It could take several weeks to restore power to customers and years to completely restore the system from the damage depending on the magnitude of the seismic event.

2.2.2 Lack of Capacity for Load Growth

The existing substations in the Downtown Vancouver Electricity Supply System are at their final stage of development with no room to add more capacity. New 12 kV feeder positions are required to supply new customers on the existing 12 kV manual dual-radial system; however, by fiscal 2027, all the 12 kV feeder positions in the Study Area will be in use, and BC Hydro will not have any feeder positions available to connect new customers and meet future load growth. To connect new customers in the interim period, BC Hydro will implement temporary measures such as loading the existing feeders above normal planning load guidelines or connecting new customers to available transfer-tie positions in other stations.

[2] The National Building Code of Canada (2020) requires post-disaster buildings, such as electrical substations, hospitals, and fire halls, to be operable following 1/2475-year return period earthquake ground motions. Seismic assessment of Murrin Substation found that Murrin Substation would experience significant damage and not be operable following 1/1000-year return period earthquake ground motions, far less than the 1/2475-year return period earthquake ground motions.

2.2.3 Need to Complete the Voltage Conversion of the Distribution System

BC Hydro has initiated a long-term plan to convert the distribution network in the Downtown Vancouver Electricity Supply System from a 12 kV manual dual-radial topology to a 25 kV automated open-loop topology. The 25 kV conversion will resolve existing distribution capacity constraint issues, improve reliability and reduce restoration time for major events, reduce manual switching, and provide more operational flexibility. However, there is no room to accommodate 25 kV station equipment at either Murrin, Dal Grauer or Cathedral Square Substations to facilitate connecting customers at 25 kV as part of the long-term 25 kV conversion plan. In the absence of 25 kV station equipment to supply customers, the benefits of the conversion cannot be realized.

2.2.4 Aging Assets

The Murrin and Dal Grauer Substations were commissioned in 1947 and 1952, respectively, and are both approaching end-of-life. Condition assessments indicate that about 60% of the Murrin Substation assets and 78% of the Dal Grauer Substation assets are in poor or very poor condition.[3] Three of the four 60 kV transmission cables supplying Dal Grauer Substation are expected to reach end-of-life over the 20-year period from fiscal 2022 to fiscal 2041. The reliability risk from these end-of-life substation and transmission assets needs to be addressed.

2.2.5 Elevated Safety Risks

There are elevated operational and safety risks at the Murrin and Dal Grauer Substations and in the 12 kV dual-radial distribution system, including insufficient electrical clearances based on today's safety standards and congested cables within maintenance vaults and cable chase-ways causing worker hazards during routine inspections and maintenance. To help mitigate these elevated safety risks,

[3] Percentages based on total asset counts.

BC Hydro implements additional planned outages, which at times can affect reliability for customers.

2.3 BC Hydro Analyzed the Alternatives and Identified the Preferred Alternative to meet the Project Need

BC Hydro undertook a staged approach to the alternatives assessment for the Project.

The first stage assessed the alternatives to address the needs of the Downtown Vancouver Electricity System. The assessment found that the only feasible alternative was to construct two new substations: one substation in the West End neighbourhood (West End Substation) to replace Dal Grauer Substation and one substation in the Strathcona neighbourhood (East Vancouver Substation[4]) to replace Murrin Substation. This first stage alternatives assessment is discussed further in Section 2.3.1 below.

The second stage of the alternatives assessment focused on identifying the most suitable location for constructing a new substation to replace Dal Grauer Substation. The assessment found that constructing a new substation at the Lord Roberts Annex site is the preferred alternative for the West End area of Downtown Vancouver. This second stage alternatives assessment is discussed further in Section 2.3.2 below.

2.3.1 Constructing Two New Substations is the Only Feasible Alternative to Address the Issues in the Downtown Vancouver Electricity Supply System

BC Hydro considered six alternatives to address the issues identified for the Downtown Vancouver Electricity Supply System:

[4] The new East Vancouver Substation, to be located in the Strathcona neighbourhood of the City of Vancouver, is exempt from the requirement to have a new CPCN pursuant to the *British Columbia Hydro and Power Authority Exemption Regulation*. As such, BC Hydro will be relying on its deemed CPCN for extensions under section 45 of the UCA for the construction and operation of the East Vancouver Substation.

1. **Do Nothing:** Continue to operate Murrin and Dal Grauer Substations as they are, run all assets to failure, and replace the assets at the time of failure. This alternative was rejected as it would not address seismic risks, the need for additional capacity, or allow the realization of the benefits of the voltage conversion of the distribution system. Further, this alternative would not address issues related to aging assets and elevated safety risks at the Murrin and Dal Grauer Substations and within the distribution system.
2. **Defer Reinforcement:** Upgrades to the Downtown Vancouver Electricity Supply System are deferred to a future date. This alternative was rejected as it would not address the seismic risks, the need for additional capacity, or allow the realization of the benefits of the voltage conversion of the distribution system. Further, this alternative would not promptly address issues related to aging assets and elevated safety risks at the Murrin and Dal Grauer Substation and within the distribution system.
3. **Upgrade Mount Pleasant Substation to offload Murrin Substation and replace Dal Grauer:** Upgrade Mount Pleasant Substation to allow BC Hydro to offload the load served by Murrin Substation onto Mount Pleasant Substation and construct a new substation to replace Dal Grauer Substation. This alternative was rejected as it would not be possible to fully offload Murrin Substation onto the Mount Pleasant Substation due to recent load growth in the Vancouver neighbourhoods of Mount Pleasant and Fairview.
4. **Replace Murrin and Dal Grauer Substations with one new substation:** Build a new 400 MVA substation on seismically stable soil in an area away from the seismic risk zone (e.g., in the downtown peninsula) to replace both Murrin and Dal Grauer Substations.[5] This alternative was rejected as it would not provide sufficient capacity or feeder positions to supply all of the Dal

[5] This alternative assumes a maximum substation capacity of 400 MVA. A substation with a larger capacity is not economical as it would require additional 230 kV transmission circuits to be constructed in order to firmly supply load. Further, a larger substation would face constraints associated with distribution cable egress.

Grauer and Murrin Substations' loads and would provide a lower summer system capacity compared to the existing system. Further, routing underground cables through downtown Vancouver to a single substation is not feasible due to severe congestion, existing infrastructure barriers, and the significant distances to supply customers at the edge of the Study Area.

5. **Upgrade Murrin and Dal Grauer Substations:** Upgrade Murrin and Dal Grauer Substations at their current locations. This alternative was rejected as not feasible due to the following issues:

   - Dal Grauer Substation: a complete load transfer to nearby substations would be required during the upgrade work to mitigate unacceptable safety risks that would be present at the constrained Dal Grauer Substation; however, there are no spare feeder positions at the nearby substations to accommodate the load transfer; and
   - Murrin Substation: seismic upgrades are not feasible as they would require outages of critical transmission cables. These transmission cables are essential to the reliability of the Downtown Vancouver Electricity System and therefore cannot be taken out of service for extended periods. These seismic upgrades at Murrin Substation are also cost prohibitive.

   Further, upgrading Dal Grauer Substation would not result in an increase in substation capacity due to its constrained location, and therefore would not address load growth.

   As a result, upgrading the Murrin and Dal Grauer Substations at their current locations is not feasible and this alternative was rejected.

6. **Replace Murrin and Dal Grauer Substations with two new substations (only Feasible Alternative):** Build two new substations to replace Murrin and Dal Grauer Substations. Under this alternative, the new substation in the West End (the Project) is intended to replace Dal Grauer Substation and a

new substation is constructed to replace Murrin Substation (East Vancouver Substation). This is the only solution that is both feasible to construct and able to fully satisfy all the requirements outlined in the DVES Plan.

Replacing the Dal Grauer and Murrin Substations with two new substations in the West End and Strathcona neighbourhoods, respectively, is the only feasible alternative to address the issues identified in the Downtown Vancouver Electricity Supply System. This alternative addresses the issues associated with seismic risks, lack of capacity, and allows the benefits of the voltage conversion of the distribution system to be realized. The alternative also addresses issues associated with aging assets and the elevated safety risks identified in the DVES Plan.

2.3.2 The Preferred Alternative for the West End Substation is a New Underground Substation at the Lord Roberts Annex Site

In 2016, BC Hydro established the following site selection criteria to determine the most suitable location for a new substation in the West End area of Downtown Vancouver to replace Dal Grauer Substation:

- Large enough to accommodate equipment for a 230 kV to 25 kV, 400 MVA substation, with minimum 40,000 ft^2 footprint, with one side being at least 138 ft long;
- Environmentally[6] and seismically acceptable;
- Central to the substation's load serving area;
- Near Dal Grauer Substation to facilitate efficient load transfer;
- Close to existing or planned transmission corridors;
- Accessible from at least three sides for cable duct banks;
- Accessible for initial construction and on-going operations; and

[6] Minimal soil and/or building contamination.

- Supported by stakeholders.

Eleven sites within the West End area were identified for initial assessment. Seven of these sites were discounted from further assessment as they failed to meet all the site selection criteria. Upon further assessment of the four short-listed sites, two were rejected as one site had a higher property acquisition cost and the other site subsequently failed to meet the minimum 40,000 ft^2 footprint area.[7]

The following two sites were selected for further review:

- **Pendrell Mews at 1500 Pendrell Street:**
  - Property: Privately owned, 100-unit residential strata building.
  - Area: 43,230 ft^2.
  - Suitable for above-ground or below-ground substation.
  - No additional property rights required.
- **Lord Roberts Annex at 1150 Nelson Street:**
  - Property: Elementary school, playground, and parking lot, owned by the Vancouver School Board, adjacent to Nelson Park.
  - Area: 68,964 ft^2.
  - Centrally located within the load area.
  - Mandatory underground substation to facilitate the construction of a replacement school by the Vancouver School Board and adjacent playing field above the substation.

BC Hydro considered these two sites in detail and made the following determinations:

[7] While the initial assessment found that the site met the minimum footprint criteria, further assessment found that to meet the site's zoning requirements some space would need to be allocated to mixed use commercial spaces, which reduced the footprint area available for the substation to below the 40,000 ft^2 minimum.

- **Constructing a New Substation at Pendrell Mews was Rejected:** The Pendrell site was technically suitable for a substation; however, it was ultimately rejected due to significant acquisition and community challenges and the impact that it would have on local housing supply. The property's strata ownership required an uncertain legal process, including a high voting threshold and potential court proceedings.[8] In addition, constructing a new substation at the site would result in a loss of scarce housing units in the West End area. The site's location deeper in the West End also meant more extensive and costly transmission and distribution connections. Additionally, an above-ground substation would be highly visible in a dense residential area, increasing the likelihood of stakeholder opposition.
- **Constructing a New Substation at Lord Roberts Annex is the Preferred Alternative:** BC Hydro selected the Lord Roberts Annex site as the preferred alternative due to its lower community impact after construction, and strategic location near Dal Grauer Substation and the load center. The site also supported a multi-use underground substation, preserved housing stock, and enabled investment in local public schools, all at a comparable long-term cost to the Pendrell Mews site.

In summary, an underground substation at the Lord Roberts Annex is the preferred alternative to address the need for the new substation in the West End area of Downtown Vancouver to replace the Dal Grauer Substation.

2.4 Project Description

The Project will construct the West End Substation, which will be a new 230 kV to 25 kV, 400 MVA substation, located underground within the Vancouver School Board's Lord Roberts Annex property at 1150 Nelson Street in Vancouver. The

[8] The sale of the property could not be completed if the initial vote was less than 80%. If the vote was greater than 80%, but not unanimous (i.e., less than 100%), a court process could be initiated to compel the sale, which could potentially take multiple years.

Project includes the construction of two 230 kV transmission lines to connect the West End Substation to Cathedral Square Substation and to the future East Vancouver Substation, as well as the civil work in the local area required for the egress of a future 230 kV transmission line, and distribution ductbanks to initially serve the community and allow the eventual transfer of full load from the Dal Grauer Substation.[9]

2.4.1 Project Location

Figure 3 below shows the location of the West End Substation. Figure 4 and Figure 5 below show the routing plans for the 230 kV transmission lines and the distribution ductbanks, respectively.

[9] Full transfer of loads from the Dal Grauer Substation to the West End Substation is expected to take up to 5 years.

Figure 3 Location of the New West End Substation and Proposed Routing of Transmission and Distribution Lines in Nelson Park

Figure 4 Proposed Routing Plan for the 230 kV Transmission Lines

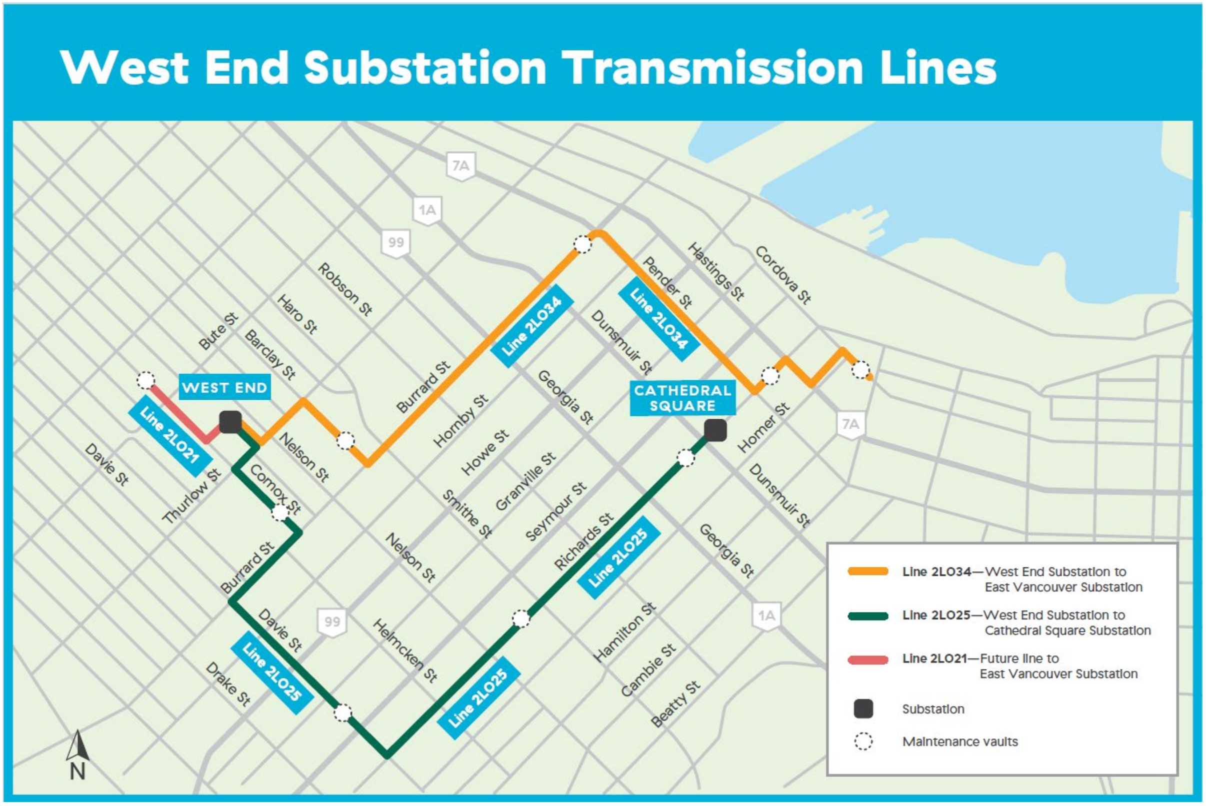
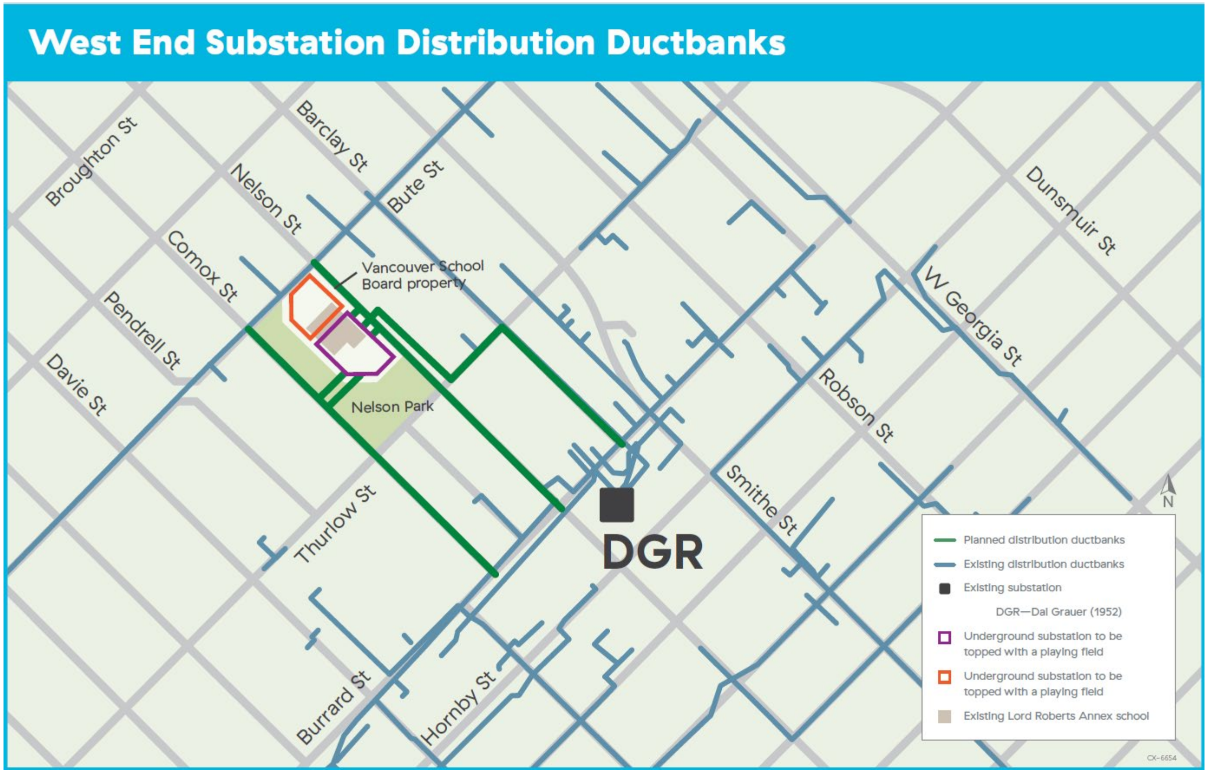


Figure 5 Proposed Routing Plan for the Distribution Ductbanks



2.4.2 Land Purchase and Agreement with the Vancouver School Board

In June 2018, BC Hydro acquired a subsurface volumetric parcel and associated property rights at the Lord Roberts Annex site from the Vancouver School Board.[10] The Vancouver School Board voted that the proceeds of the sale be used to construct a new school at Coal Harbour as well as a replacement school at the Lord Roberts Annex property.

Since BC Hydro's Project will require the removal of the existing school building at the Lord Roberts Annex property, the Vancouver School Board has been constructing the new school at Coal Harbour. The new school at Coal Harbour is currently expected to be ready to receive students by September 2026. When the

[10] Pursuant to Order G-246-20, the purchase of land at the Lord Roberts Annex for the West End Substation was approved as an addition into BC Hydro's rate base. The property acquisition is not part of the Project scope that BC Hydro is seeking approval for in this CPCN Application.

Project is sufficiently advanced, the Vancouver School Board will begin construction of its replacement school at the Lord Roberts Annex property. The new elementary school will be constructed on the western portion of the Lord Roberts Annex site, and the West End Substation will be built within the eastern portion of the site. Once construction is complete, a new school field and play equipment will be constructed on top of the substation roof.

In February 2022, BC Hydro also acquired from the Vancouver Park Board and City of Vancouver, the statutory rights-of-way, restrictive covenants, and access easements through Nelson Park required to connect the West End Substation to existing electrical infrastructure, and access to the substation via the access ramp.

2.4.3 Project Cost

The Project has a project cost range from $756 million to $1.391 billion (**Project Cost Range**). The Project Cost Range is based on an Expected Cost[11] of $1.028 billion with an estimating accuracy range of -27% / +36%.[12] The Project Cost Range is based on Feasibility Design, conforming with the activities required to complete an AACEI[13] Class 4 cost estimate.

The Preliminary Design is expected to be completed in April 2026, and the Project Cost Range will be updated in June 2026, upon completion of the activities required for an AACEI Class 3 cost estimate.

[11] The Expected Cost is defined as the estimated cost at the P50 confidence level, as defined in Association for the Advancement of Cost Engineering International Recommended Practice 10S 90, which indicates “an expected 50% probability that the final result will be less than (more favourable) or equal to the P50 value.”

[12] The Expected Cost does not include the cost savings expected as a result of advancing the Project’s in-service date by 12 months to July 2032.

[13] Association for the Advancement of Cost Engineering International.

2.5 First Nations Consultation and Stakeholder Engagement

2.5.1 First Nations Consultation

The Project is within the traditional territories of Cowichan Tribes, Halalt, Lyackson, Musqueam, Penelakut Tribe, Seabird Island, Shxw'ōwhámel, Skawahlook, Soowahlie, Squamish, Stz'uminus, Tsleil- Waututh, Ts'uubaa-asatx, and Tsawwassen First Nations as per the Provincial Consultative Areas Database.

BC Hydro, as a Crown agent, has an obligation to act honourably in its dealings with First Nations. This includes an obligation to consult, and where appropriate, accommodate Nations' interests when BC Hydro contemplates conduct that may adversely affect Aboriginal title or rights. In the case of this Application, the Crown conduct being contemplated is the construction of the Project.

BC Hydro expects minimal or no incremental adverse impact on Aboriginal rights or title arising from the Project since Project activities will take place on a developed impacted urban area and no Crown land acquisitions are required.

BC Hydro has provided Project information and updates to all potentially affected First Nations, solicited feedback regarding the Project and its potential impacts, and responded to all questions and concerns. BC Hydro will explore Indigenous procurement opportunities for Project electrical works, transmission and distribution duct bank works and site restoration works.

As of the filing of this Initial Application, the potentially affected First Nations have not identified any significant concerns with the Project. BC Hydro will continue to provide Project information, and work in collaboration with First Nations to solicit their input, understand their interests, and respond to any questions or concerns, including accommodating First Nations' interests as appropriate, as the Project progresses.

2.5.2 Stakeholder Engagement

BC Hydro's engagement approach is informed by the International Association of Public Participation framework and best practices, which provides a structured approach to engaging the public in decision-making, helping build trust, improving outcomes, and ensuring that those affected have a meaningful voice in the process. BC Hydro is committed to ensuring that people who may be affected by the Project are informed about it, understand the need for the Project, and have opportunities to provide feedback.

Since 2017, BC Hydro has been engaging stakeholders and the community on the Project, including outreach to elected representatives and staff at the Vancouver School Board, Vancouver Park Board and the City of Vancouver, business representatives including the West End Business Improvement Association, community associations such as the Lord Roberts Annex Parent Advisory Council, the West End Farmers' Market, Nelson Park Community Gardeners, and residents' associations, as well as individuals who will be impacted by the Project.

To date, activities have included presentations, meetings, collaborations, community consultations, open houses, and community outreach.

As of the filing of this Initial Application, stakeholders and the public have not identified significant concerns about the Project that cannot be mitigated. BC Hydro will continue its comprehensive approach to stakeholder and community engagement until the Project is in-service.

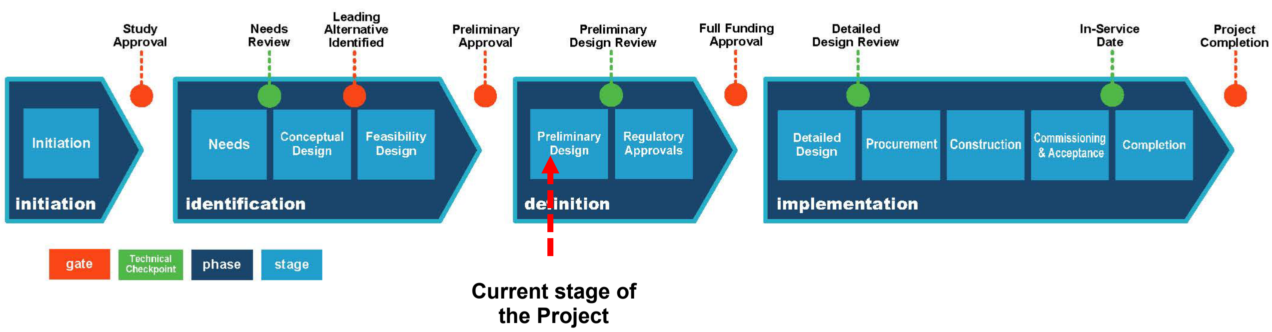
3 BC Hydro is Requesting a Decision on the Application by October 30, 2026

BC Hydro requests that the BCUC establish a regulatory timetable that will facilitate a decision on the Application by October 30, 2026. A decision by this date would provide BC Hydro with an opportunity to advance the start of construction by approximately 12 months to November 2026. This is expected to result in an earlier in-service date of July 2032 and cost savings.

3.1 Current Status of the Project

The Project is in the Preliminary Design stage of the Definition phase of BC Hydro's project lifecycle, as indicated in Figure 6 below.

Figure 6 BC Hydro Project Lifecycle



To date, the following progress has been made on the Project:

- Confirmed the scope and technical requirements of the Project to best meet the Project objectives;
- Conducted in-depth discussions and site visits with several utilities in North America, Europe and Japan that have recently implemented complex substations in dense urban settings. The purpose was to solicit information and lessons learned on the latest equipment technology, design innovations, construction techniques, and approach to risk management;
- Advanced the design and development, prepared the Feasibility Design Report and progressed the preliminary design to approximately 15 to 20% complete;
- Produced an AACEI Class 4 Project Cost Estimate;
- Commenced assessment of the estimated customer bill impacts of the Project;
- Developed a procurement approach;

- Conducted site investigations, including three geotechnical and two environmental drilling programs, to inform the Preliminary Design Report and the Environmental and Socio-economic Effects Report (**ESER**), which identifies the environmental, archaeological and socio-economic impacts of the Project and documents plans to mitigate such impacts;
- Consulted with the identified affected First Nations;
- Collaborated closely with the Vancouver School Board on the design of the future replacement school;
- Collaborated closely with the City of Vancouver and the Vancouver Park Board on the routing of the transmission and distribution lines; and
- Engaged with stakeholders and affected communities.

Over the next eight months, BC Hydro will be advancing the Project through the following key milestones:

- Awarding an early engagement contract to a general civil contractor to commence construction planning activities, with the option to award the ultimate contract to construct the substation;[14]
- Awarding the initial stage of major equipment contracts to allow early collaboration between the equipment suppliers and the project team to optimize the design and facilitate early construction planning;[14]
- Issuance of the development permit for the substation by the City of Vancouver for the application submitted in October 2025;[15]
- Completing the Preliminary Design by April 2026 and commencing final design;

[14] Major construction and equipment supply contracts will include multiple stages and a clause that the final execution stage award will be conditional on BC Hydro being granted a CPCN for the Project.

[15] A special permitting process was agreed to by BC Hydro and the City of Vancouver in light of the *Hydro and Power Authority Act*.

- Producing and AACEI Class 3 Project Cost Estimate and updated Project schedule, by June 2026;
- Continuing engagement and consultation with First Nations; and
- Continuing communication, consultation and outreach activities with the public and key stakeholders.

3.2 Proposed Regulatory Process to Achieve Benefits of Earlier In-Service Date

BC Hydro is requesting that the BCUC establish a regulatory timetable for the proceeding to facilitate a decision on the Application by October 30, 2026. This Initial Application is being submitted to the BCUC in advance of the Application, so that the BCUC may appoint a Panel, establish a regulatory timetable, and initiate the process of public notice and intervener registration.

Following this Initial Application, BC Hydro proposes to file the Application in three successive stages, as follows, with each stage building upon the information provided in the preceding stage(s).:

- **Stage 1 Application (to be submitted in December 2025):** This will include details on Project need, alternatives, high-level project description and cost estimate based on Feasibility Design, First Nations consultation and public engagement to date, and risks. BC Hydro is proposing a round of information requests (**IRs**) on the Stage 1 Application;
- **Stage 2 Application (to be submitted in May 2026):** This will include further details and updates to the Project description based on the Preliminary Design Report, and summaries of Project impacts (based on an ESER), permits and authorizations. BC Hydro proposes a second round of IRs after the filing of the Stage 2 Application, that may include follow-up IRs on the Stage 1 Application and IRs on the Stage 2 Application; and

- **Stage 3 Application (to be submitted in July 2026):** This will include the updated Project Cost estimate, based on an AACEI Class 3 cost estimate, bill impacts, Project schedule, updates on current Project risks and any new risks, and updates on First Nations consultation and stakeholder engagement. BC Hydro proposes that Stage 3 proceed expeditiously, with a single round of IRs focused only on the updated information filed in Stage 3, without revisiting issues such as Project need, justification and alternatives that would have been already canvassed in the previous IR rounds for Stages 1 and 2.

Pursuant to Section 4 of the BCUC Rules of Practice and Procedure, BC Hydro respectfully submits that, in the interest of regulatory efficiency, it may be appropriate for the BCUC to determine a quantum of information requests a party is permitted to ask in each IR round in this proceeding.

The majority of the work required to compile the need, alternatives and justification, First Nations consultation, and risks sections of the CPCN application for the Project are complete, with only the Preliminary Design Report,[16] Class 3 estimate,[17] and the final round of public consultation remaining. By filing the Application in the staged approach outlined above, the regulatory process can begin sooner, facilitating a decision by October 30, 2026.

The staged approach is a reasonable way to review the Application. The Stage 1 Application contains the key issues of Project need and alternatives, the review of which can reasonably begin prior to the material filed in the Stage 2 and 3 Applications, which themselves can be reviewed independently. At the same time, there will be an opportunity over the course of the proceeding to review and consider all stages of the Application together once the Class 3 estimate is filed in Stage 3.

[16] The Preliminary Design Report is the key input for preparing the Class 3 estimate and is scheduled to be completed in April 2026.

[17] The Class 3 estimate for the Project is scheduled to be completed by June 2026.

Table 1 below provides BC Hydro's proposed regulatory process for the review of the Application.

Table 1 Proposed Regulatory Review Process

Event	Date
Initial Application	**November 10, 2025**
BC Hydro provides Notice of Application	November 24, 2025
BC Hydro confirmation of compliance with notice requirements	December 1, 2025
Stage 1 Application	**December 16, 2025**
BCUC Information Requests (IR) No. 1	February 2, 2026
Intervener IR No. 1	February 9, 2026
BC Hydro responses to BCUC and Intervener IR No. 1	March 16, 2026
Stage 2 Application (Preliminary Design Report)	**May 4, 2026**
BCUC and Intervener IR No. 2	June 1, 2026
BC Hydro responses to BCUC and Intervener IR No. 2	June 29, 2026
Stage 3 Application (Class 3 Estimate)	**July 2, 2026**
BCUC and Intervener IR No. 3	July 16, 2026
BC Hydro responses to BCUC and Intervener IR No. 3	July 30, 2026
BC Hydro Final Argument	August 6, 2026
Intervener Final Argument and Letters of Comment	August 20, 2026
BC Hydro Reply Argument and Response to Letters of Comment	September 3, 2026
BCUC Decision	**October 30, 2026**

3.3 Summary of Application Stages, Content and Appendices

Table 2 below summarizes the proposed content and appendices to be filed in each stage.

Table 2 Summary of Application Stages, Application Content, and Appendices

Stage	Content
Stage 1 Application (December 2025)	
	Chapter 1 – Introduction
	Chapter 2 – Project Justification
	Chapter 3 – Project Alternatives
	Chapter 4 – Project Description (high-level based on Feasibility Design Report and Class 4 estimate[18])
	Chapter 5 – First Nations Consultation and Public Engagement
	Chapter 6 – Project Risks
	Appendix – Downtown Vancouver Electricity Supply Plan (excluding appendices)
	Appendix – Project First Nations Consultation Records
	Appendix – Project Stakeholder Engagement Materials
	Appendix – Project Delivery Risk Process and Matrix
Stage 2 Application (May 2026)	
	Chapter 4 Update – Project Description (updates based on Preliminary Design Report and ESER, but excluding cost estimate, bill impact analysis, and schedule)
	Appendix – Preliminary Design Report
Stage 3 Application (July 2026)	
	Chapter 4 Update – Project Schedule, Costs, Bill Impact, Updates on First Nations Consultation and Public Engagement, and Update on Risks (if any)
	Appendix – Project Schedule
	Appendix – Class 3 Cost Estimate
	Appendix – Project Bill Impact Analysis

[18] BC Hydro does not intend to submit the Feasibility Design Report or the Class 4 estimate as part of the Stage 1 Application.

3.4 Final Order to be Sought and Proposed Project Reporting

At the end of the staged process, BC Hydro is seeking an Order from the BCUC pursuant to sections 45 and 46 of the *Utilities Commission Act* granting a CPCN for the Project.

Consistent with the Compliance Reporting section of the 2024 Capital Filing Guidelines,[19] BC Hydro proposes to file with the BCUC:

- Annual progress reports, covering the Project cost and risks, within 45 days of the end of each reporting period; and
- In the event of a material change between annual progress reports, a Material Change Report, within 30 days of the Material Change occurring or within 30 days of the appropriate authority within BC Hydro being informed of a potential Material Change, whichever is earlier. A material change is defined as follows:[20]
  - ▶ Cost – The Authorized Cost of the project is forecast to exceed the Authorized Cost that is part of the BCUC's Decision and Order granting a Certificate of Public Convenience and Necessity or accepting the capital expenditures schedule for a project;
  - ▶ Schedule – There is a delay in the forecast In-Service Date of the project as compared to the application;
  - ▶ Scope – There are one or more major changes to the project's deliverables and the work required to create those deliverables or to the main components of the project scope provided in the application.

[19] As approved by BCUC Decision and Order G-218-24.
[20] 2024 Major Capital Project Guidelines as approved by Final Order G-218-24.

- For annual progress reports, BC Hydro proposes to include explanations of variances greater than 30% for any row or line item to be provided in the cost range breakdown table in the Stage 3 Application.
- Also consistent with the Compliance Reporting section of the 2024 Capital Filing Guidelines, BC Hydro proposes to file the Final Report for the Project one month after review by BC Hydro's Board of Directors, or 24 months after the Project in service date, whichever is earlier. BC Hydro proposes to include the following:
  - The final cost of the Project, including a breakdown of final costs; and
  - A comparison of the Project final cost estimate, including explanations of variances greater than 10% for any row number or line item to be provided in the cost range breakdown table in the Stage 3 Application.