

**Fred James**

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November 29, 2019

Mr. Patrick Wruck  
Commission Secretary and Manager  
Regulatory Support  
British Columbia Utilities Commission  
Suite 410, 900 Howe Street  
Vancouver, BC V6Z 2N3

Dear Mr. Wruck:

**RE: British Columbia Utilities Commission (BCUC or Commission)  
British Columbia Hydro and Power Authority (BC Hydro)  
Borex Ocean Falls Limited Partnership – Application for Approval of  
Rates and Terms and Conditions for Service to BC Hydro  
BC Hydro Submission Regarding Regulatory Process**

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BC Hydro writes to respond to Directive 3 of BCUC Order No. G-265-19, which requests submissions from Borex and registered interveners to address three specific questions by November 29, 2019. BC Hydro provides its responses to each question.

- 1 Whether interveners intend to file intervener evidence and, if so, the subject matter of the evidence and proposed timing of this evidence in the regulatory process;

**BC Hydro's response:**

**BC Hydro's decision whether to file such evidence and on what subject matters will depend on the information that is provided by Borex during the information request process. BC Hydro proposes that it will confirm whether it will file any intervener evidence, the nature of such evidence and the proposed timing for filing as outlined in its response to Question 3 below.**

- 2 Whether any supplemental information in addition to the item requested in Directive 5 to Order G-265-19 is required at the beginning of the regulatory process. If so, please identify the specific supplemental information and provide a rationale as to why it is required; and

**BC Hydro’s response:**

The following table provides a description of BC Hydro’s requested supplemental information required at the beginning of the regulatory process, prior to the submission of information requests, and provides our rationale for the additional information request.

Item	Supplemental Information Request Description	Rationale for Request
1	Actual operating expenditures, by category of expense, for the last five years	Provides the historical trend and a basis for forecasting the operating expenditures for the next four years
2	Corporate financial statements (i.e., balance sheets, income statements, and cash flow statements), prepared by a Certified Accountant for the last five years	Allows for verification of historical capital and operating expenditures that are used to support forecast operating and capital expenditures for the next four years
3	All annual and long term capital plans that have been prepared in the last five years and the most recent capital expenditure forecast for the next 20 years	Provides the outlook and context for assessing forecast capital expenditures for the next four years
4	The capital plan at the time of Boralex’s acquisition of the Ocean Falls facility in 2009	Provides historical context for assessing forecast capital expenditures for the next four years
5	All asset condition assessments completed by Professional Engineers since Boralex considered acquiring the facility in 2007/08 through to the present	Provides a technical assessment of the condition of the facility assets to set a basis for considering forecast capital expenditures for the next four years

- 3 Whether the review of the Application should proceed by way of a written public hearing, or some other process. If some other process is proposed, please identify the specific process and the rationale.

**BC Hydro’s response:**

BC Hydro submits that the BCUC should set a deadline for Boralex to submit the information identified in BC Hydro’s response to Question 2 above, before starting any information request process. This will result in a more efficient regulatory review process.

Following Boralex’s submission of the identified information above, BC Hydro proposes a written public hearing which includes two rounds of information requests. BC Hydro further proposes that the remaining regulatory process, including submission of intervener evidence, is to be determined after all parties,

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**including the BCUC and BC Hydro, have had a chance to review Boralex's information request responses.**

For further information, please contact Anthea Jubb at 604-623-3545 or by email at [bchydroregulatorygroup@bchydro.com](mailto:bchydroregulatorygroup@bchydro.com).

Yours sincerely,



Fred James  
Chief Regulatory Officer

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