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July 2, 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: British Columbia Utilities Commission (BCUC or Commission)
British Columbia Hydro and Power Authority (BC Hydro)
Inquiry of Expenditures Related to the Adoption of the SAP Platform
SAP Inquiry Report
Response to SAP Inquiry Report on Recommendations**

I am writing to the BCUC to provide a written response to the recommendations contained in the SAP Inquiry Report. During the recent Revenue Requirements Application proceeding in February/March, legal counsel for the Commercial Energy Consumers suggested the BC Hydro respond to the recommendations. I believe that was a very good suggestion and acknowledge we should have provided this response earlier.

The SAP Inquiry Report contained eleven recommendations from the BCUC, which are listed in Appendix A of this report. The BCUC also provided its findings on the five scope items that were the subject of the inquiry itself. While three of the scope items were specific to the decision to choose the SAP solution, two were broader and addressed aspects of BC Hydro's management decision making and overall culture.

The inquiry panel found that BC Hydro's decision-making framework resulted in a business case that did not properly support the SAP decision and that the expenditures related to the SAP project escaped the proper degree of scrutiny as a result of the manner in which they were sought. The BCUC also concluded that inadequate financial analysis had been undertaken. The BCUC did find that BC Hydro had appropriate project deliverance governance in place and that it should ensure an analysis of the quantified benefits and costs of projects and that there be an assigned accountability for the realization of benefits.

Regarding the question of the level of information disclosed to the BCUC, the inquiry panel found no evidence that the BCUC was intentionally misled. However, it did conclude that a lack of training had given rise to a culture of reticence at BC Hydro to disclose information to the BCUC when there may have been a question of doubt about

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something. There was also a finding that in 2008 the management of BC Hydro were not adequately trained in the role of the BCUC in regulation of BC Hydro.

As described in the attached report, changes have been made to our governance and internal decision frameworks that have strengthened our management, financial decision making and oversight of capital and technology projects. BC Hydro also now has in place strong internal management processes that define and shape a corporate culture that understands and respects the role of the BCUC and our responsibilities as a regulated utility.

In this report we provide a discussion of BC Hydro's regulatory focus, our relationship with the BCUC, how we operate in accordance with the recently approved 2018 Capital Filing Guidelines and our capital approval processes and steps we take to track benefits from our projects, all of which were the subject matter of the eleven inquiry report recommendations.

I trust that our responses to the eleven recommendations contained in the SAP Inquiry Report will demonstrate our firm commitment to maintaining a strong regulatory culture at BC Hydro and ensuring a relationship with the BCUC built on mutual respect and trust.

Yours sincerely,



Chris O'Riley
President & Chief Operating Officer

fj/ma

Enclosure

Copy to: BCUC Project No. 1598990 (Fiscal 2020 to Fiscal 2021 Revenue Requirements Application) Registered Intervener Distribution List.

BCUC Project No. 1598878 (Inquiry of Expenditures Related to the Adoption of the SAP Platform) Registered Intervener Distribution List.

**Inquiry of Expenditures Related to the
Adoption of the SAP Platform**

**BC Hydro Response to SAP Inquiry Report
Recommendations**

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Introduction

1. As a regulated utility, BC Hydro recognizes and respects the role and function of the BCUC under the regulatory framework governed primarily by the *Utilities Commission Act (UCA)*. BC Hydro's internal management processes define and shape a corporate culture that reflects an understanding and acceptance by BC Hydro's employees of the responsibilities, and resultant requirements, of being regulated and how this is manifested when considering major initiatives, strategies, capital projects and operational planning.
2. This begins at the top. Chris O'Riley, our President and Chief Executive Officer, has issued Mandate Letters to each member of his Executive Team containing the following:

“BC Hydro is a regulated utility, and subject to oversight and supervision by numerous regulatory bodies. At all times, BC Hydro will maintain open, transparent and respectful relationships with these regulators, and I expect you to support this objective in the course of your work.

All of your work should be planned and executed so as to be in compliance with applicable regulations, particularly those in relation to safety, the environment and reliability standards. We also must comply with the Tariffs and Water Licenses.”

3. BC Hydro acknowledges that the circumstances that gave rise to the SAP Inquiry, as well as our approach to regulation over the years, contributed to the impression that BC Hydro at times “*takes the narrowest possible legal defense view of its relationship with the BCUC*”. We believe our commitment to be more open and transparent as well as improvements to our internal governance address the BCUC's recommendations in the SAP Inquiry Report. But actions speak louder than words. The recent RRA oral hearing process, as well as other recent regulatory proceedings, demonstrate our commitment to these principles.

4. While we generally acknowledge that BC Hydro could be less “legalistic” at times in our approach to regulation and our relationship with the BCUC, it is equally important to acknowledge that the BCUC is an independent administrative tribunal that operates within a legal framework governed by administrative law and regulatory principles, as well as key legislation such as the UCA and the *Clean Energy Act*. Everyone who participates in the regulatory process including the BCUC, utilities and interveners and particularly their respective legal counsel, has a responsibility to ensure the decisions and the decision-making process respects this important legal framework. There may be times when BC Hydro may protect personal or privileged information or ask that commercially sensitive information be provided under the confidentiality guidelines established by the BCUC. However, those situations are, by their nature, more limited and should not detract from the guiding principles and high standard we set for ourselves to be open and transparent with the BCUC, our customers and other interveners and stakeholders.
5. The balance of this submission provides BC Hydro’s response to the eleven recommendations, which we have considered and accept. Rather than list out each recommendation, followed by a description of BC Hydro’s actions in response, we provide a discussion of BC Hydro’s corporate regulatory focus; our relationship with the BCUC; how we now operate in accordance with the 2018 Capital Filing Guidelines that were approved in January 2020 (BCUC Order No. G-31-20); and finally, how we are addressing recommendations regarding our capital project approval processes and benefit tracking (Appendix A provides a concordance table between the eleven recommendations and this report).

BC Hydro's Regulatory Focus

6. The Comprehensive Review of BC Hydro Phase 1 Final Report issued in February 2019 enhanced the BCUC's regulatory oversight of BC Hydro. This change in the regulatory environment that BC Hydro operates in provided an opportunity for BC Hydro to reinforce the institutional responsibilities and benefits of being a regulated utility. As noted, this is also reflected in the CEO's Mandate Letter issued to each Executive Team member.
7. Executives are assisted in their roles by a set of policies, organizational tools and decision frameworks that result in regulatory considerations being entrenched in decision making. Our Project and Portfolio Management (**PPM**) and Information Technology Delivery Standard Practices (**ITDSP**) frameworks hardwire regulatory actions into capital project planning and execution. Our recently approved 2018 Capital Filing Guidelines set the ground-rules that BC Hydro will follow when determining whether a project needs to be filed with the BCUC or not. Finally, our Financial Responsibility & Approval Authority Policy (**FAAP**) and Management and Accounting Policies and Procedures (**MAAP**) ensure that financial and accounting controls are in place to provide accurate and complete recording of projects that will be reviewed by the BCUC.
8. BC Hydro's regulatory group has a number of processes, principles and practices that are followed in order to maintain and build within BC Hydro a corporate culture that recognizes the role of the BCUC and the necessity of having a positive working relationship between BC Hydro and the BCUC, all while respecting the independence of the BCUC. Some of these are specific to major applications being filed, while others are ongoing and not attached to any one proceeding.

9. Specifically, for major applications and initiatives, regulatory strategy is developed and policy issues resolved at Business Group leadership tables (for example our Revenue Requirements Application, Mandatory Reliability Standards (**MRS**), Integrated Resource Plans (**IRP**)). The Chief Regulatory Officer (**CRO**) or Senior Regulatory Managers sit on steering committees and working groups for major capital projects, compliance projects (such as the Executive MRS Steering Committee and MRS Management Working Group), rate design Steering Committees, and the IRP advisory committee to name a few. Working at this level ensures that regulatory requirements and strategy are addressed up front and at the beginning of every project and initiative.
10. As noted above, a further example of an institutionalized process that is hardwired into our decision making is our PPM framework for managing engineering and construction projects, which require that regulatory requirements are considered when developing project strategies and implementation plans by way of a Project Information Questionnaire (**PIQ**). At the initiation of a project a PIQ is completed and identifies regulatory involvement and assigns regulatory advisors. Similarly, the regulatory requirements for technology projects are assessed during the ITDSP Identification phase and based on project complexity screening criteria, a regulatory advisor may be engaged. In both cases, the regulatory advisors will review regulatory risks in the project identification stage and also lead the development and drafting of applications to the BCUC. During the implementation phase of a project, regulatory advisors review and file any BCUC compliance reports as required or directed by the BCUC.
11. In order to ensure a two-way dialogue and be kept up to date on all issues that could have regulatory implications, BC Hydro's CRO regularly meets with the President and CEO; Executive Vice-President Finance, Technology, and Chief Financial Officer along with other executives, senior managers and directors.

The CRO also meets monthly with the full executive team to provide a regulatory report and to have discussions with the Executive Team on emerging issues. Quarterly, the CRO also briefs BC Hydro's Board on regulatory matters.

12. On an ongoing basis, it is also important that our regulatory responsibilities be understood by all of BC Hydro's employees. BC Hydro's CEO will highlight major regulatory filings and issues in his bi-weekly employee letter that is sent out to all BC Hydro employees (an example is provided in Appendix B). This serves the purpose of keeping our employees aware of major initiatives and also to educate them on the relationship between BC Hydro and the BCUC. Further, BC Hydro's corporate communications department has a representative on the working team for all significant applications filed with the BCUC. The reason is two-fold: to prepare information and outgoing communications to Government and News Releases; and to provide employees with updates in order to keep them informed of our activities with the BCUC, which serves to reinforce the BCUC's role.
13. Finally, major capital applications and in particular, our revenue requirements applications, require a concerted and coordinated work effort across many different key business units at BC Hydro. At this time as BC Hydro comes back under enhanced regulation, for many of our employees this may be the first time they are working on a project that has a regulatory purpose. Because of this, in advance of filing the Fiscal 2020 to Fiscal 2021 Revenue Requirements Application (**F20-F21 RRA**) BC Hydro undertook an extensive internal training program for all staff involved, focused on application drafting and in the Information Request (**IR**) process.
14. Specifically, all executives and workers involved in preparing and reviewing responses to IRs were trained on how to draft responses that are true, articulate, fulsome and transparent. The training also emphasized the importance of those responses in developing the evidentiary record of the

proceeding. This training, while undertaken to support the RRA process, also has value in drafting IRs in all of our proceedings, as the same principles of truth, openness and transparency apply to all of our applications.

15. BC Hydro's F20-F21 RRA was the first revenue requirements application to be reviewed by the BCUC by way of an oral proceeding since 2008 when the BCUC reviewed our Fiscal 2009 to Fiscal 2010 Revenue Requirements Application. This recent hearing process provided an excellent opportunity for the hundreds of BC Hydro employees involved in the regulatory proceeding, either as witnesses (many for the first time) or developing and drafting the application and the thousands of evidentiary IRs, to get first hand experience and an understanding of regulation, further strengthening BC Hydro's regulatory culture and focus.
16. BC Hydro considers that all of the above processes, programs and training create a corporate culture whereby working with the BCUC is understood as a necessary and important element in achieving the best possible decisions and outcomes for our ratepayers and stakeholders.

BC Hydro's Relationship with the BCUC

17. BC Hydro views its relationship with the BCUC as one of mutual respect and trust. BC Hydro respects the role of the BCUC in providing independent oversight of BC Hydro's actions and decisions and as a proxy for the market forces that a monopoly utility is not exposed to. Through this independent oversight, the BCUC gives our customers, interveners and stakeholders additional confidence that our actions and decisions are reasonable, prudent and in the public interest. BC Hydro trusts that the BCUC reaches its decisions with an open and unbiased mind, after a careful and considered review and understanding of information and evidence provided to it, with the assistance of a professional and knowledgeable staff and counsel.

18. However, as noted by the BCUC in the SAP Report, sometimes this information flow can be one-sided as the BCUC may not know what it doesn't know. BC Hydro's strives to be open and transparent. If we are unclear on a request or believe we need to provide additional information we will do so. However, there also needs to be a recognition by both parties of a need for a proper balance of information. BC Hydro could take the view that it should inundate the BCUC with information, however we choose to be more discerning and provide information that is focused and relevant to the issues at hand. As noted above, we train those involved in regulatory processes to respond to IRs in a fulsome and clear manner providing a robust response to the question asked. This is a change from our former philosophy under which we were more inclined to be spare with our responses.
19. A good example of this principle is illustrated by the following: during the F20-F21 RRA BC Hydro filed an updated Information on Technology Capital Projects document (Exhibit B-29). There was no requirement that BC Hydro provide this information, and it was selective (we did not file updated information on all other capital projects). We filed in order to be open and transparent with regard to our information technology projects and also to give an update on the cancellation of the Metro North Project, as we knew that the BCUC had expressed interest in that particular project.
20. The nature of operating an electrical generation, transmission and distribution system can mean that the topics of some of the applications filed with the BCUC for approval can be technically challenging. Prior to the filing of applications that have a significant element of complexity, BC Hydro will meet with BCUC staff and/or interveners to give them a tutorial/workshop on the issues in the application. For example, BC Hydro and Powerex provided BCUC staff with an explanation and overview of the California market structures before

we filed a tariff application to allow for dynamic scheduling thereby allowing Powerex to operate in the California Energy Imbalance Market.

21. We acknowledge the impact of our strategic decisions and the resulting business actions flowing from them on our customers. The BCUC may review our strategic decisions through various means. Operating strategic decisions are reflected in BC Hydro's revenue requirements applications that are filed for review and approval by the BCUC. BC Hydro's recently approved 2018 Capital Filing Guidelines provide for additional information to be filed in RRAs in Appendices I, J, K and L to help identify projects and linkages to strategies, plans, studies and programs of projects to provide more visibility to the BCUC into linked projects.
22. Strategic capital decisions are also reflected in either our 10-year capital plans that are filed with our Revenue Requirement Applications and updates to our capital plan information provided in our annual financial report to the BCUC filed in late July or in individual capital projects filed for approval which may be components of a larger capital program, such as the Campbell River System Engineering Assessment. Finally, we will be filing our next Integrated Resource Plan for acceptance in 2021.
23. BC Hydro considers that the discussion and examples described above demonstrate a respectful, engaged and positive relationship with the BCUC.

2018 Capital Filing Guidelines

24. Several of the SAP Report recommendations are focused on BC Hydro's capital planning processes and level of disclosure of capital information to the BCUC. At the time the SAP Report was issued, BC Hydro was still engaged in a regulatory proceeding for the review and approval of its updated 2018 Capital Filing Guidelines. One of the report's recommendations was that BC Hydro should consider the merits of the Commercial Energy Consumer's (CEC) Capital Plan Requirement Application Review Process as part of the BC Hydro proceeding.
25. BC Hydro examined the CEC's evidence put forth for a capital review process and it was actively reviewed by BC Hydro and other interveners during the proceeding, including a round of information requests focused on the CEC's evidence. BC Hydro also retained an expert consultant and provided rebuttal evidence on the CEC's proposals. The BCUC reviewed both the CEC's and BC Hydro's evidence related to CEC's proposed review process and made determinations on both party's evidence in its decision. In the BCUC's final Decision (Order No. G-313-19) the contributions of both the CEC and BC Hydro concerning the CEC's proposal were acknowledged.
26. A further SAP Report recommendation focused on assurance that BC Hydro would provide a level of capital plan and project information to the BCUC in order to ensure that a project was not broken into its component parts to enable the BCUC to properly review and approve aggregated programs and component projects. In its decision approving all of BC Hydro's 2018 Capital Filing Guidelines the BCUC determined that BC Hydro's proposals on what constitutes a project or program and when they should be filed were appropriate and they were accepted.

27. BC Hydro also committed to identifying individual projects (above materiality limits) in Appendix I to its revenue requirements applications and indicate whether a particular project is part of a program. A summary sheet of Programs of Projects is now included in Appendix J to our revenue requirements applications.
28. Finally, in compliance with the BCUC decision, BC Hydro included in its approved 2018 Capital Filing Guidelines a requirement to include in its Annual Report to the BCUC a list of all extension capital expenditures, where the extension capital expenditures meet the criteria that:
- (a) the financial approval of extension capital expenditures is authorized by BC Hydro or expected to be authorized at a group, program or other aggregated level; and
 - (b) any individual capital expenditures within the group, program or other aggregated level are extensions.

Recommendations on BC Hydro's EAR/Business Case Framework

29. The Inquiry Report contained several recommendations directed at BC Hydro's EAR and Business Case Framework. First, there is a recommendation that BC Hydro ensure that its approvals and decision framework provide clarity on the types of decisions being made and communication of those decisions to parties that need to know to ensure a shared and common understanding of each approval granted.
30. BC Hydro follows strict financial approval processes that are set out in its Financial Responsibility & Approval Authority Policy, as well as other related requirements in its Management and Accounting Policies and Procedures (**MAPP**). Expenditure Authorization Requests (**EAR**) and related authorization

documents are prepared based on the funding request and signed by the appropriate financial approver based on the Financial Approval Authority Procedure. For capital projects, funding requests for non-recurring projects and programs are presented to and endorsed by different “gate” committees prior to financial approval for advancing to their next project phase. There is also an established ex-plan approval process for capital projects which is overseen by BC Hydro’s Capital Delivery Management Committee.

31. With regard to the communication of decisions, at Executive Team or Board meetings clarification is first provided as to whether a decision is being sought or if the presentation is for information and discussion. Board decisions are documented in minutes. Executive Team meetings are communicated by Executive Team members to their direct report leadership teams who further disseminate information as appropriate.
32. Second, the BCUC stated that BC Hydro should ensure that EAR/Business Case submissions contain a thorough and meaningful evaluation of alternatives when considering different courses of action.
33. BC Hydro’s business case processes require the analysis requested by the BCUC, with some specific analysis required for Information Technology projects. Our MAPP Business Case Template requires a listing of all viable project alternatives and these alternatives are to be evaluated by achievement of project objectives. BC Hydro’s Business Case Requirements Guidelines were updated in January 2019 and include a requirement for project alternatives and structured decision making. BC Hydro’s Information Technology Business Case Template also requires a clear identification of alternatives, a structured decision-making table as well as an identification and means to measure the expected benefits. Further, each technology project over \$1 million includes a finance section that summarizes the analysis of alternatives.

34. Third, the BCUC also recommended that BC Hydro should ensure that project approval requests (whether embedded in the EAR and/or a Business Case) include a clear articulation of expected benefits, with observable outcomes and specified timeframes and that benefits should be tracked and reported.
35. BC Hydro addresses the analysis and tracking of expected benefits as recommended. BC Hydro's Business Case Requirements Guidelines require a structured decision-making consequence table for projects greater than \$6 million, and strongly encourages it for all projects having multiple viable alternatives¹. The consequence table provides for an appropriate level of comparison including the comparison of expected benefits.
36. BC Hydro's MAPP also requires an Impacts and Benefit Realization Table for projects greater than \$20 million when they are approved, for technology projects all business cases include the table. Subsequently, the Project Completion and Evaluation Report, which is prepared after the project is placed in-service, requires the completion of this table to show the actual results of benefits achieved compared to the benefits planned in the original business case.
37. Finally, as described in the F20-F21 RRA (section 6.5.5), a technology specific benefits realization pilot initiative is underway and is expected to transition to a formal practice in fiscal 2021. BC Hydro will be reporting on its benefit realization process in our next revenue requirements application, expected to be filed in February 2021.

¹ BC Hydro is in the process of updating its business case template to require all projects with viable alternatives to have a structured decision-making consequence table. The updated template will also have a greater emphasis on why a project is needed.

Conclusion

38. As stated at the beginning of this report, BC Hydro executives and management recognize and respect the role and function of the BCUC. BC Hydro's internal management processes define and shape a corporate culture that reflects an understanding and acceptance by BC Hydro's employees of the responsibilities, and resultant requirements, of being a regulated utility. BC Hydro trusts that this report provides assurance to the BCUC that the eleven recommendations from the SAP Report have been agreed to and acted on by BC Hydro.

APPENIDX A

SAP Report Recommendations

The Table of Concordance below provides each of the 11 recommendations in the SAP Report and a reference to BC Hydro's response.

No.	Recommendation	Response Paragraph Reference
1(a)	BC Hydro should foster and adhere to a corporate culture whereby working with the BCUC is a necessary and important element in achieving the best possible decisions	2, 7 - 16
1(b)	BC Hydro should approach decisions regarding information disclosure to the BCUC from a perspective that is informed by "if in doubt, provide the information".	18 - 20
1(c)	BC Hydro should consider the Commercial Energy Consumer's (CEC) Capital Plan Requirement Application review process as part of the BC Hydro Review of the Regulatory Oversight of Capital Expenditures and Projects (CEPR) proceeding currently underway.	24 - 26
2	BC Hydro should actively and consistently keep Regulatory Affairs informed of actions/decisions that may have regulatory implications	8 - 11
3	BC Hydro should avoid taking the narrowest possible "legal defense" view of its regulatory relationship with the BCUC	3 - 4
4(a)	BC Hydro should operate under the expectation that many, if not all, strategic decisions have a financial impact, and that all decisions with financial impacts must be disclosed/reviewed/approved in accordance with the regulatory requirements in place at the time of the decision	21 - 22
4(b)	<p>BC Hydro should ensure that its 2018 Capital Filing Guidelines, currently the subject of another proceeding with the BCUC, clearly meet the expectations of:</p> <p>Ensure projects are aggregated according to BC Hydro's existing financial policies and procedures, aggregated to the highest reasonable level and strategies with financial implications have all their costs aggregated into a program for review and approval.</p> <p>Ensure that both aggregated programs and their component projects are appropriately reviewed and approved.</p> <p>Precludes breaking apart a project into component parts that fall below review threshold levels.</p>	24 - 28

No.	Recommendation	Response Paragraph Reference
4(c)	BC Hydro should ensure that its approvals/decision framework: <ul style="list-style-type: none"> • Provides clarity on the distinction between formal approvals, decisions and information briefings. • Ensures complete and accurate documentation of all formal approvals and decisions. Communicates the approvals/decisions to all parties that need to know. Ensures a shared and common understanding of the specific nature (including limitations and follow-up obligations) of each approval granted.	29 - 31
5(a)	BC Hydro should ensure that EAR/Business Case submissions contain a thorough and meaningful evaluation of alternatives when considering different courses of action	32 - 37
5(b)	BC Hydro should ensure that project approval requests (whether embedded in the EAR and/or Business Case) include a clear articulation of expected benefits, with observable outcomes and specified timeframes.	34 - 37
5 (c)	BC Hydro should ensure that benefits derived from projects are tracked and reported, and are also assessed to evaluate the extent to which expected outcomes were achieved and the contributing factors thereto	34 - 37

APPENDIX B**EMPLOYEE COMMUNICATION OF JANUARY 22, 2020 FROM CHRIS O'RILEY**

Hi everyone,

This week, we began the oral hearing for our Fiscal 2020 to Fiscal 2021 Revenue Requirements Application. An oral hearing is one way we're held accountable to our customers. It gives us an opportunity to publicly explain our plans and proposals, and for stakeholders to test our thinking. An open and transparent process inherently helps build public support for our decisions. A hearing can also help put a human face to a large institution, which is always valuable. We haven't had an oral hearing on our revenue requirements since fall 2008, making this one especially significant.

For the last two days, I was on the witness stand alongside David Wong at the BC Utilities Commission hearing room to answer policy questions, and to explain and defend the budgets we've outlined in our rate application. As CEO, my particular role is to set the overall expectation for our organization's participation in this proceeding. I appreciated the opportunity to explain the challenges we face and our thinking and plans to respond.

The hearing will carry on this week and beyond with witness panels who will speak on our operating costs, load forecasting, capital planning, and demand-side management programs, among other topics. There are a total of 19 witnesses from BC Hydro participating in this hearing, including many of our executive team members and senior managers who have spent months preparing for the hearing.

In addition, many people all over BC Hydro have worked extremely hard on this application and I think this comes through in the quality of the work. I felt well-supported while on the stand representing BC Hydro and I want to thank everyone for their diligence and hard work.

Today I thought I would share my opening statement to the hearing, which begins with my reflection on evidence filed by the Kwadacha and Tsay Keh Dene First Nations as participants in the process.

Chris