

Fred James

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January 25, 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. 1599162
British Columbia Utilities Commission (BCUC or Commission)
British Columbia Hydro and Power Authority (BC Hydro)
Reconsideration and Variance of Directives Relating to Powerex Corp.
(Powerex) Net Income in the Fiscal 2020 to Fiscal 2021 Revenue
Requirements Decision**

BC Hydro writes in accordance with BCUC Order No. G-9-21 to provide BC Hydro's reply to intervener submissions.

BC Hydro proposed a filing date of May 31, 2021 for its submission in this proceeding.¹ With one exception, there appears to be a consensus that BC Hydro's proposed filing date is reasonable. CEC,² BCOAPO,³ BCSEA,⁴ and MOVEUP⁵ all support or accept BC Hydro's proposed filing date.

AMPC submits that BC Hydro's submission should be part of the Fiscal 2023 Revenue Requirements Application but supports BC Hydro's proposed filing date as an alternative.⁶

CEABC⁷, the lone exception among the parties who filed submissions, submits that the proceeding to review the 2020 Transfer Pricing Agreement (**2020 TPA**) should not be adjourned and that a later filing date for BC Hydro's submission in this proceeding

¹ Exhibit B-2.

² Exhibit C1-1.

³ Exhibit C3-1.

⁴ Exhibit C4-1.

⁵ Exhibit C5-1.

⁶ Exhibit C2-1.

⁷ Exhibit C6-1.

means that it is more likely that inertia will set in with regard to its review. We respectfully disagree on both points.

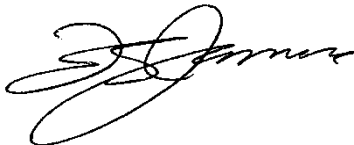
In the proceeding to review the 2020 TPA, BC Hydro made submissions on the link between 2020 TPA and the issues and findings underlying Directives 17 and 17A in the BCUC's Decision on BC Hydro's Fiscal 2020 to Fiscal 2021 Revenue Requirements Application.

The issues and findings underlying Directives 17 and 17A are complex and important. Providing an additional two months so that BC Hydro has adequate time to prepare will support a proper evidentiary record and is procedurally fair and reasonable.

With regard to AMPC's comments on the scope of BC Hydro's submission and the treatment of any confidential information,⁸ BC Hydro's submission will review the issues and findings underlying Directives 17 and 17A and will include a proposal for the treatment of any confidential information. Once BC Hydro's submission has been filed, the BCUC could consider further comments on the scope of the proceeding and the treatment of any confidential information.

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

cs/rh

⁸ Exhibit C2-1.