

Fred James

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August 23, 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)
Transmission Service Permanent Freshet Energy
Rate Application
Extension Request to Filing Date in BCUC Order No. G-106-19 Directive 4**

BC Hydro is seeking approval for an extension to the filing date for its application for a permanent Freshet Energy Rate (**Freshet Rate**) which was directed by BCUC Order No. G-106-19. BC Hydro is requesting a one month extension to the filing date for the reasons provided below. The proposed new filing date is October 31, 2019 instead of September 30, 2019 as directed by the BCUC.

The Freshet Rate was offered on an optional basis to Transmission Service Rate Schedule (**RS**) 1823 customers as a three-year pilot during the months of May through July for calendar years 2016, 2017 and 2018. On April 8, 2019, BC Hydro filed with the BCUC requesting approval for an extension of the previously approved RS 1892 – Transmission Service – Freshet Energy until December 31, 2019 pursuant to sections 58 to 60 of the *Utilities Commission Act*. This request was approved by Commission Order No. G-106-19. This Order also directed BC Hydro to submit an evaluation report for the Freshet Rate Pilot for 2019, on or before October 31, 2019 and to file an application for a permanent Freshet Rate on or before September 30, 2019.

BC Hydro believes that there is significant benefit to filing its application for a permanent Freshet Rate together with the Year 4 evaluation report for the 2019 Freshet Rate Pilot. The Year 4 evaluation results are expected to provide information relevant to offering a permanent Freshet Rate.

BC Hydro will require the full amount of time provided by the current timeline to complete the Year 4 evaluation report. BC Hydro anticipates that it will require the rest of August to complete the RS 1892 billing reconciliation for the customers that participated in the 2019 Freshet Rate Pilot. This information will be required prior to engaging participant customers in September and October to identify and verify actions they took to increase load, to perform the analysis of ratepayer impacts, and to prepare the Year 4 evaluation report. In addition, BC Hydro will require the time to reflect the Year 4 evaluation results into its application for a permanent Freshet Rate.

Additional time is also required to complete the Transmission Service Rate customer engagement on the proposed permanent Freshet Rate, which will include obtaining additional feedback on certain aspects of the proposed permanent Freshet Rate design (such as eligibility, pricing, baseline determination and service characteristics).

Currently, BC Hydro is not anticipating substantive changes to the availability and terms and conditions for the permanent Freshet Rate. Given that BC Hydro will be seeking approval for a permanent Freshet Rate, it expects the regulatory proceeding to enable customer and stakeholder input and discussion. BC Hydro will accommodate the appropriate timeline to allow this to occur. If the regulatory proceeding takes longer than expected, BC Hydro may apply for an interim Freshet Rate effective May 1, 2020.

Therefore, BC Hydro respectfully requests that the filing date for its application for a permanent Freshet Rate be extended by one month to October 31, 2019, which is consistent with the timeline for the filing of the Year 4 evaluation report.

For further information, please contact Anthea Jubb at 604-623-3545 or by email at bchydroregulatorygroup@bchydro.com.

Yours sincerely,



(for) Fred James
Chief Regulatory Officer

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