



June 19, 2020

Sent via email/eFile

[Letter L-37-20]

Mr. Fred James
Chief Regulatory Officer
British Columbia Hydro and Power Authority
16th Floor – 333 Dunsmuir Street
Vancouver, BC V6B 5R3
bchydroregulatorygroup@bchydro.com

Re: British Columbia Hydro and Power Authority – 2021 Integrated Resource Plan

Dear Mr. James:

We understand that British Columbia Hydro and Power Authority (BC Hydro) is currently preparing its Integrated Resource Plan (IRP) which is due to be filed to the British Columbia Utilities Commission (BCUC) after February 28, 2021, in accordance with section 44.1(2.1) of the *Utilities Commission Act*. We appreciate the effect the COVID-19 pandemic has had on workload and schedules at BC Hydro, however, we would like to stress the importance of the timing of this anticipated filing.

The IRP is not just a planning document and roadmap for BC Hydro, it is also a key regulatory tool for the BCUC and all the participants in our processes. The IRP provides an essential insight into BC Hydro's planning priorities and as such it guides the review of all applications, from Electricity Purchase Agreements (EPA) to Certificates of Public Convenience and Necessity to Revenue Requirement Applications.

Further, to be effective, an IRP must be continually updated to allow for changes in technology, demographics, the economy and all other relevant inputs. This is especially the case in these COVID-19 times.

Currently, we effectively have no IRP. The last time the BCUC reviewed BC Hydro's IRP was in 2010. This is hampering our ability to efficiently review BC Hydro applications. A recent example of this is the Brown Lake et al. EPA renewal application. In that application the Panel was unable to ascertain, in the absence of a recent IRP, whether the energy was required or not and was therefore unable to approve the contracts as filed.

Our expectation is the BC Hydro will file its IRP in the first quarter of 2021, or shortly thereafter. While this may appear challenging, there may be approaches that could provide meaningful results in a shorter timeline. Further as you know, BC Hydro has the option of filing an evidentiary update once the review process commences, for any significant changes in forecasts. We are flexible and are prepared to work with you to develop approaches to achieve the desired result of a timely filing.

BCUC staff are available to assist BC Hydro in this regard and we encourage you to contact them to discuss further.

Sincerely,

Original signed by:

Marija Tresoglavic
Acting Commission Secretary

DM/ae