



**ORDER NUMBER  
G-98-25**

IN THE MATTER OF  
the *Utilities Commission Act*, RSBC 1996, Chapter 473

and

British Columbia Utilities Commission  
Review of Resource Planning Guidelines

**BEFORE:**

M. Jaccard, Panel Chair  
A. K. Fung K.C., Commissioner  
T. A. Loski, Commissioner

on April 14, 2025

**ORDER**

**WHEREAS:**

- A. In December 2003, the British Columbia Utilities Commission (BCUC) issued Resource Planning Guidelines (Guidelines) to assist the development of long-term resource plans by energy utilities;
- B. On March 6, 2024, in the Decision accompanying Order G-58-24 accepting BC Hydro's updated 2021 Integrated Resource Plan, the BCUC recommended the Guidelines be reviewed;
- C. On March 20, 2024, in the Decision accompanying Order G-78-24 accepting Fortis BC Energy Inc. (FEI) 2022 Long Term Gas Resource Plan, the BCUC recommended a review of the Guidelines be undertaken; and
- D. The BCUC considers establishing a process to review the Guidelines is warranted.

**NOW THEREFORE** the BCUC orders as follows:

- 1. The regulatory timetable for review of the Guidelines is established as set out in Appendix A of this order.
- 2. Parties are invited to comment on the draft updated guidelines provided in Appendix B.

**DATED** at the City of Vancouver, in the Province of British Columbia, this 14<sup>th</sup> day of April 2025.

BY ORDER

*Electronically signed by Mark Jaccard*

M. Jaccard  
Commissioner

British Columbia Utilities Commission  
Review of Resource Planning Guidelines

**REGULATORY TIMETABLE**

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Action	Date (2025)
Letters of comment	Thursday, May 15

British Columbia Utilities Commission  
Review of Resource Planning Guidelines

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Draft Updated Guidelines

April 14, 2025

## Introduction and Purpose of the Resource Planning Guidelines

Under the *Utilities Commission Act* (UCA), public utilities are required to periodically file long-term resource plans (LTRPs) for review by the British Columbia Utilities Commission (BCUC). The purpose of these plans is for utilities to identify the means by which they intend to serve the future demand for energy of their customers. The BCUC has developed these Resource Planning Guidelines (Guidelines) to promote the filing of LTRPs which contain the information necessary for the BCUC to efficiently and effectively review LTRPs in accordance with section 44.1 of the *Utilities Commission Act* (UCA). The Guidelines set out the information that the BCUC generally requires to evaluate the various components of an LTRP, and to determine whether carrying out the LTRP would be in the public interest. The BCUC may also order utilities to file certain information in future LTRPs pursuant to section 44.1(2) of the UCA, for example as part of the BCUC's decision on whether to accept an LTRP. In the case of any potential conflicts with the Guidelines, BCUC orders take precedence over these Guidelines.

The BCUC must consider a utility's most recently filed LTRP in its review of certain other applications by that utility under the UCA, namely expenditure schedules (section 44.2 of the UCA), certificates of public convenience and necessity (sections 45 and 46), and energy supply contracts (section 71). LTRPs may also provide guidance for other applications made by the utility. Therefore, the Guidelines are also intended to promote the filing of information which may enable more efficient BCUC reviews of subsequent utility applications. However, LTRPs do not mandate specific investment decisions by the utility. Unless explicitly ordered by the BCUC pursuant to section 44.1(9) of the UCA, the BCUC's acceptance of an LTRP does not imply BCUC approval of any utility initiative under other sections of the UCA.

The Guidelines do not prescribe specific analytical methods nor outcomes of an LTRP. Resource planning should reflect the specific circumstances of a utility at a given time, and the process used to develop LTRPs and to identify future actions arising from an LTRP remain within the purview of the utility's management. The Guidelines are not intended as a mechanistic checklist, and the BCUC's decision to accept an LTRP depends on broad considerations. Certain sections of the Guidelines may not be directly applicable to every utility, and the BCUC recognizes that departures from the Guidelines may be warranted in some circumstances, particularly in the case of small utilities. However, failure to address the Guidelines, without sound explanation for any departures, may result in less efficient reviews or rejection of an LTRP application.

### 1.0 Planning Context for the LTRP

- a) Utilities should provide an overview of external factors which are relevant to the LTRP, such as: energy and greenhouse gas (GHG) policies, regulations and bylaws at a federal, provincial, and municipal level; policy developments relating to Indigenous groups; market factors; economic drivers; and technological advancements.
- b) An LTRP should identify whether and how the factors described in subsection a) have been directly or indirectly accounted for in the development of demand forecasts, resource options, portfolio analysis, risk assessment, or other relevant aspects of the LTRP.
- c) Utilities should provide any objectives or criteria which have been used to develop and evaluate the LTRP, with an explanation of how these were determined.
- d) Where applicable, utilities should summarize any actions taken to co-ordinate or align resource planning with other utilities in BC and discuss how these other utilities' resource planning activities may impact the LTRP.

- e) Unless otherwise specified by the BCUC, the planning horizon for LTRPs is at the discretion of the utility, but supporting rationale should be provided. The planning horizon may take into account factors including but not limited to: the lead time that may be needed to plan and implement assets; milestone dates outlined in relevant legislation or policy; and the expected interval until the next LTRP.

## 2.0 Gross Demand Forecasts

- a) Utilities should develop a minimum of two gross demand forecasts or scenarios (i.e. forecasts before any estimated reductions from demand-side measures ) for both annual and peak demand, which illustrate a reasonable range of potential outcomes. The number of forecasts or scenarios should balance the need to adequately illustrate demand uncertainties, while avoiding excessive complexity. Forecasts should be presented with a breakdown by customer class. Utilities should briefly explain whether any of the forecasts or scenarios are considered more likely, either in quantitative or relative terms.
- b) LTRPs should include a description of the methodological approach used for demand forecasting, and explanation of the key assumptions underpinning the forecasts. For peak demand, this should include the assumptions used to estimate peak weather conditions.
- c) Electric utilities should also include a discussion or quantification of the potential impact upon future demand of distributed energy resources which are not influenced by the utility's demand-side management activities and are outside of the utility's direct control.
- d) Utilities should include discussion or analysis to illustrate the most significant drivers of uncertainty associated with the demand forecasts and scenarios, and how these have been addressed in the LTRP.

## 3.0 Demand-Side and Supply-Side Resource Options

- a) LTRPs should list feasible demand and supply-side resources, both committed and potential. Utilities should outline the main attributes and uncertainties associated with the feasible resource options, as they relate to the planning circumstances of the utility. At a minimum, this should include estimated cost ranges, an estimate of the potentially available energy and capacity contribution, and the basis for such estimates. Utilities may also explain if there are potential resources that have been screened out from further consideration in resource portfolios.
- b) Natural gas utilities should provide an overview of factors which may affect future commodity supply and prices, and transportation and storage availability. Natural gas utilities should summarize the utility's broader strategy to mitigate future price volatility, and potential actions to address any significant risks to adequacy of supply and transportation.
- c) Utilities should provide an overview of any resources which are anticipated to expire or reach end-of-life in the planning horizon.
- d) For demand-side measures (DSM), sufficient information must be provided to demonstrate that the planned DSM portfolio the utility intends to pursue is both adequate and cost-effective, in accordance with the provisions in the *Demand Side Measures Regulation* and pursuant to section 44.1(8)(c) of the UCA.
- e) Utilities should describe the key assumptions used to estimate the planned level of energy and capacity savings from cost-effective DSM. The LTRP should clarify whether there are any key differences between the level of DSM that may be pursued by the utility under different demand forecasts or scenarios.

- f) LTRPs should outline the anticipated regional transmission system constraints that occur under different demand scenarios, and may outline planned investments accompanied by an overview of any potential alternatives. Where applicable, utilities should also discuss the extent to which the need for potential transmission investments may be affected by the composition of the preferred resource portfolios (as discussed in the following section), or the extent to which limitations of the transmission system may affect the composition of the preferred resource portfolios.
- g) Utilities should provide discussion and analysis of the potential distribution system level impacts associated with different demand forecasts or scenarios. Electric utilities should also discuss the impacts of distributed energy resources, and natural gas utilities should discuss the impacts of any planned increases in supply of low carbon fuels.
- h) LTRPs should summarize any significant resiliency risks which may impact the utility's ability to serve its forecasted demand, and outline potential resource strategies that may be required to address these risks.

#### 4.0 Resource Portfolios

- a) LTRPs should include analysis comparing alternative portfolios of demand and supply-side resources that would be required under different demand forecasts or scenarios. This should include explanations of the overall process used by the utility to develop these portfolios and the evaluation criteria and decision-making process used to select the preferred resource portfolio(s). For clarity, an LTRP may contain multiple preferred resource portfolios or contingency plans which could be implemented by the utility under different circumstances. Additionally, a preferred resource portfolio does not necessarily need to be developed to precisely meet a single demand forecast, e.g. the volume of resources comprising the preferred portfolio could fall between two demand forecasts, but in such circumstances the utility should explain how it determined the appropriate total volume of the resources in the portfolio.
- b) Utilities should identify the most significant risks or uncertainties associated with the preferred portfolio(s), and demonstrate how the preferred portfolio(s) performs under different demand scenarios and other significant uncertainties. This should include discussion or analysis to illustrate the extent to which the LTRP is sufficiently flexible to guide utility management as it responds to unforeseen changes in demand, supply, or other key factors.
- c) For utilities where there may not be sufficient feasible resources to allow for meaningful trade-offs of alternative portfolios, the utility should provide justification that such portfolio analysis is not warranted.
- d) Utilities should provide a clear and concise statement to explain why planned facilities or energy purchases are not being replaced by DSM, pursuant to section 44.1(2)(f) of the UCA, with supporting analysis. Where a utility has modelled numerous potential DSM portfolios, this may also include an explanation of how and why the utility's preferred level of DSM was selected.
- e) In circumstances where customer demand is forecast to decline either regionally or system-wide, utilities may discuss whether there are resources that will no longer be required to serve customers, and if there are potential benefits that may be realized from actions such as early decommissioning of facilities or non-renewal of energy purchases.

## 5.0 BC Energy Objectives

- a) Utilities should provide an outline of how the LTRP addresses BC's energy objectives as expressed in legislation or regulations applicable to the LTRP, and a brief explanation of why certain energy objectives are not applicable to the LTRP.
- b) To assist with evaluating how the LTRP addresses BC's energy objectives pertaining to reductions in BC's GHG emissions, utilities may include analysis to estimate the BC GHG emissions associated with and/or avoided by the utility's preferred portfolio(s) of resources. The LTRP should also briefly describe the method used to estimate GHG emissions.

## 6.0 Consultation and Engagement

- a) During the development of an LTRP, utilities should generally solicit input from parties who may be affected by the LTRP, which may include customers, Indigenous Nations and groups, local governments, industry, and other interest groups. The LTRP should include a brief explanation of the utility's chosen approach to consultation and engagement, and a brief summary of engagement activities undertaken at different stages of the development of the LTRP, including feedback received, and an explanation of how issues raised were addressed and incorporated in the LTRP.
- b) The utility may discuss the extent to which its consultation and engagement activities provide support for the BCUC's consideration of whether the LTRP is in the interests of persons in British Columbia who receive or may receive service from the public utility pursuant to section 44.1(8)(d) of the UCA.
- c) Utilities may briefly summarize future consultation and engagement activities that are planned outside of the LTRP process, for example with respect to any actions identified in the action plan.

## 7.0 Near-Term Action Plan

- a) An LTRP should detail the specific resource acquisition steps that the utility expects to undertake in the near-term – at a minimum covering the time until the expected filing of the next LTRP.
- b) The action plan should also address the actions that may be required to prepare for or advance contingency plans under differing circumstances, which may include changes such as: customer demand, policy, market conditions, or technology. Utilities should also outline what criteria, tools or methods will be used to determine whether and how contingency resource plans will need to be implemented.
- c) If not addressed elsewhere, utilities should identify the key risks and uncertainties associated with the delivery of the action plan.
- d) A utility should indicate its preferred timing for the filing of its next LTRP, with supporting explanation.
- e) The LTRP should summarize any significant methodological changes the utility intends to explore for its next LTRP.



## 8.0 Miscellaneous Filing Guidelines and Procedural Considerations

- a) To enable an efficient review process, LTRPs should include a summary of the most significant changes (to inputs, assumptions, methodologies, outputs, response to BCUC directives etc.) since the filing of the previous LTRP. In circumstances where data, methodologies, assumptions and other key information are generally unchanged from a utility's previous LTRP, utilities should be mindful of duplicating extensive supporting information. Utilities may provide cross-references to previous LTRPs where such information is contained in greater detail, where this could reduce the length of the application or enable a narrower scope of a proceeding.
- b) The main body of an LTRP application should generally be sufficient to understand its key components without the need to refer to technical appendices. However, utilities may include technical appendices containing supporting documentation sufficient to allow parties to evaluate the data and assumptions in greater detail. Consideration should be given to limit technical appendices to those matters which are substantive, novel and/or complex. Utilities may also include a summary statement of the supporting technical documents that have substantively contributed to the development of the LTRP, but have not been included within an application for the purposes of reducing the length of the filing.
- c) Pursuant to section 44.1(9) of the UCA, in accepting an LTRP in whole or in part, the BCUC may either (a) exempt a utility plant or system, or an extension of either, from the operation of section 45(1) of the UCA, or (b) order that a matter that is adequately addressed in the LTRP is conclusively determined for the purposes of any hearing or proceeding under the UCA, except for the purposes of a hearing or proceeding under section 99. Utilities may consider seeking an order pursuant to section 44.1(9) of the UCA as part of an LTRP application, and in such circumstances should file supporting information including:
  - i. An explanation of whether there is sufficient information available in the LTRP to enable the BCUC to make a determination under section 44.1(9);
  - ii. Evidence that parties that may be directly affected by the BCUC's determination under section 44.1(9) have been provided adequate notice or the opportunity to participate or be represented in the proceeding; and
  - iii. A discussion of whether and how a BCUC determination under section 44.1(9) would promote regulatory efficiency by reducing the scope or eliminating the need for future BCUC proceedings, without unduly expanding the scope of the BCUC's review of the LTRP.
- d) The BCUC recognizes there is a risk that information filed in an LTRP may become out-of-date during lengthened regulatory proceedings. In LTRP applications, utilities are encouraged to propose a regulatory review process that balances efficiency with the need for open and transparent hearings. Utilities are also encouraged to provide supporting information to justify any proposals for a limited regulatory process or a narrowed scope, for example: demonstration of limited changes in assumptions, methods, and outputs since the last LTRP; evidence of robust consultation process and broad support for the LTRP; the need to receive a BCUC decision by a certain date; limited actions required before the filing of the next LTRP; or a short timeline proposed for filing of next LTRP. Utilities may also consider where pre-hearing technical workshops could be utilized to reduce the overall need for information requests or otherwise streamline the regulatory review.