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VIA EMAIL

November 26, 2020

Ministry of Forests, Lands, Natural Resource Operations and Rural Development
Water Management Branch
Utility Regulation Section
PO Box 9340 Stn Prov Govt
Victoria, BC V8W 9M1

Attention: Chris McMillan, Secretary to the Comptroller of Water Rights

Dear Mr. McMillan:

**Re: Corix Multi-Utility Services Inc.
Request for Amendment to Revised Regulatory Timetable
Application to Amend Water Rates for Panorama Water Utility
Revenue Requirement & Rate Application for 2020 through to 2022**

Corix Multi-Utility Services Inc. ("Corix") owns and operates a water utility, Panorama Water, which provides service to customers in Panorama Mountain Village. Corix has filed a Rate Application for Panorama Water with the Comptroller of Water Rights ("Comptroller"), which is currently under consideration. On October 21, 2020, the Comptroller issued Order No. 2573 which included a Revised Regulatory Timetable. The Revised Timetable had Corix to file its response to Information Requests; Corix to submit its Final Submission based on the evidentiary record in the hearing; Interveners to file their Final Submissions; and Corix to provide a Reply Submission to conclude the submissions in the hearing.

On November 23, 2020, Corix received Intervener Submissions from Trappers Way Residential Group ("Trappers Way") and Panorama Subdivision Owners Association ("PSOA"). The Intervener Submissions provided Intervener comments on the application but also included further detailed information requests ("Further Information Requests"). Trappers Way provided 2 pages of submissions which contain six points of comments and concerns. Trappers Way's filing also included 13 pages of further information requests. PSOA filed four pages, of which the last two included further information requests. Typically, Intervener Submissions reflect the Interveners' summation of its positions and outline any issues of concern. Intervener Submissions usually do not contain further information requests.

Corix considers that the evidentiary record to-date has been well developed and is sufficient for the Comptroller to make a decision on the application following submissions from all parties. In Information Request No. 1, Corix responded to Information Requests from the Comptroller (38 pages), Trappers Way (43 pages plus 24 confidential pages), and PSOA (9 pages plus 8 confidential pages). The evidentiary record in this hearing is more than double than the evidentiary record for the previous 2019 rate application. Corix submits that responses to a further round of information requests would not add materially to the existing evidentiary record and would not add to the issues and concerns already addressed in the Intervener Submissions. Nonetheless, Corix recognizes that the proposed rate increase is significant and wishes to be respectful and responsive to all of the concerns and questions raised by all parties who are participating in the hearing process.

Corix filed its Final Submission based on the existing evidentiary record on November 9, 2020. The remaining Revised Regulatory Timetable has Corix filing its Reply Submission on November 30, 2020. In light of the latest developments Corix believes that an amendment to the Revised Regulatory Timetable should be considered by the Comptroller.

Options for the Remainder of the Hearing

Two options for the remainder of the hearing are described below:

Option 1:

Corix files its Reply Submission on December 14, 2020. In the Reply Submission Corix will respond to the issues, comments and concerns raised in the Intervener Final Submissions and will also address the key issues and concerns raised in the Further Information Requests from the Interveners. In this option Corix will not be responding to each specific information request and no new evidence will be filed. This option will nominally extend the regulatory timetable and allow Corix to review the Further Information Requests and address the key issues raised in those questions in its Reply Submission. This option will require an amendment to the Revised Regulatory Timetable for the Reply Submission date.

Option 2:

The Comptroller amends the Revised Regulatory Timetable and re-opens the evidentiary record to allow Corix to file full detailed responses to all of the questions in the Further Intervener Information Requests, which will be added to the evidentiary record. Subsequently, Corix would file a Supplemental Final Submission addressing only the issues raised in the Further Information Requests. Interveners would then file their Supplemental Final Submissions on the issues raised in the Further Information Requests. Corix would then conclude the hearing with its Reply Submission. This option will require an amendment to the Revised Regulatory Timetable and would continue the regulatory process into 2021, adding additional time and cost to the hearing.

Corix believes that Option 1 will adequately address the issues and concerns raised in the hearing from Interveners, while also facilitating a timelier conclusion to the hearing. While Option 2 would be appropriate if the additional information provided from the responses to the Further Information Requests better illuminates the issues and concerns identified by the Interveners in its Final Submissions, Corix submits that a detailed response to the Further Information Requests is not likely to provide information that will materially impact our collective understanding of the issues identified in the Intervener Submissions. That said, Corix is not opposed to Option 2 if the Comptroller and Interveners strongly believe that there is significant value to be gained from another round of Information Requests at the expense of extra time and cost and a postponement in the expected decision date.

In response to Trappers Way IR No. 1 Q. 7.3, it was noted that “Corix does not anticipate any additional Corix incurred consultant costs beyond what has been proposed.” Corix proposed \$18,000 for consulting costs to complete the application hearing process. This budget estimate did not anticipate a further round of information requests beyond the extensive information requests completed to date. Corix anticipates that additional consulting costs will be required to fully respond to the further information requests and complete the hearing process if Option 2 is selected.

Regulatory Timetable Options

If Option 1 were selected an amendment to the Revised Regulatory Timetable (Order No. 2573) would be required.

Option 1: Proposed Amended Regulatory Timetable

Corix to provide any Reply Submission

December 14, 2020

If Option 2 were selected an amendment to the Revised Regulatory Timetable (Order No. 2573) would also be required. Considering the length of the questions, availability of personnel, and the upcoming holiday season, the following regulatory timetable would be.

Option 2: Proposed Amended Regulatory Timetable

Corix to respond to the Further Information Requests	December 24, 2020
Corix to provide its Supplemental Final Submission	January 11, 2021
Interveners to provide their Supplemental Final Submissions	January 18, 2021
Corix to provide any Reply Submission	January 29, 2021

Corix notes that if Option 2 is selected it will require at least three weeks advance notice to prepare the response. If a decision on the amended regulatory timetable is delayed, the schedule of dates should be adjusted accordingly.

Request for Amendment to the Revised Regulatory Timetable

Corix requests an amendment to the Revised Regulatory Timetable set out in Order No. 2573. Specifically, Corix submits that the Corix Reply Submission scheduled for November 30, 2020 should be delayed given the Intervener filing of Further Information Requests, and the associated uncertainty of the impact on the remaining regulatory timetable. Corix has provided two options for the Comptroller to consider for amending the timetable. Given that the next item in the existing timetable is for Corix to file its Reply Submission on November 30, 2020, Corix respectfully requests an indication from the Comptroller that it is amendable to postpone the existing Reply Submission date while deliberations are undertaken on the appropriate timetable to conclude the hearing.

Corix submits that Option 1 will allow Corix time to review the Intervener Submission and address the key issues and concerns raised in the Further Information Requests. This option will provide a timelier conclusion to the hearing though no further evidence will be filed. Corix submits that the evidentiary record contained in the Evidentiary Update and the responses to Information Request No. 1 are very thorough and complete, and are sufficient for the Comptroller to make a decision on the application and the issues and concerns raised by the parties. Corix is not opposed to Option 2. However, Option 2 will extend the timetable into 2021, result in additional costs to complete the regulatory process, and will not necessarily assist in addressing the issues and concerns already identified in the Intervener Final Submissions.

Accordingly, Corix requests that the Comptroller consider an appropriate amended Regulatory Timetable that will assist in its decision making on the application for the issues raised in the hearing, while also taking into account the benefits and costs associated with an extended regulatory process, as outlined above.

If you have any questions, please contact me at (604) 455-3633.

Sincerely yours,

Corix Multi-Utility Services Inc.



Ron Zink
Director, Financial Planning & Analysis

cc: Elena Oliphant
Trappers Way Residential Group
Panorama Subdivision Owners Association
Panorama Mountain Resort