



Dennis Swanson  
Director, Regulatory Affairs

**FortisBC Inc.**  
Suite 100 - 1975 Springfield Road  
Kelowna, BC V1Y 7V7  
Ph: (250) 717-0890  
Fax: 1-866-335-6295  
regulatory@fortisbc.com  
www.fortisbc.com

July 6, 2009

**Via Email**  
**Original via mail**

Ms. Erica M. Hamilton  
Commission Secretary  
BC Utilities Commission  
Sixth Floor, 900 Howe Street, Box 250  
Vancouver, BC V6Z 2N3

Dear Ms. Hamilton:

**Re: Net Metering Tariff Application Project No. 3698552**

Please find enclosed FortisBC Inc.'s Reply Submission with regard to the above noted project. Twenty copies will be couriered to the Commission.

Sincerely,

A handwritten signature in black ink, appearing to be "Dennis Swanson". The signature is stylized with a large, looped initial "D" and "S".

Dennis Swanson  
Director, Regulatory Affairs

## **FORTISBC INC. FINAL SUBMISSION**

### **A. INTRODUCTION**

- 1 On June 17, 2009, FortisBC Inc. (“FortisBC” or “the Company”) filed with the British Columbia Utilities Commission (“the Commission”) its Final Submission regarding its Application for a Net Metering Tariff and associated documents.
- 2 Final Submissions were received from the B.C. Sustainable Energy Association and the Sierra Club of British Columbia (BCSEA, *et al*) on June 17, 2009, Buryl Goodman on June 18, 2009, Resolution Electric Ltd. (“Resolution”) on June 24, 2009, and the BC Old Age Pensioners Organization (the “BCOAPO”) and Okanagan Environmental Industry Alliance (the “OEIA”), on June 25, 2009.

### **B. INTERVENOR FINAL SUBMISSION**

- 3 BCSEA, *et al* note with respect to its two primary concerns with the program, namely the purchase rate for net excess generation and the inspection fee, that they;

*“are satisfied that this is an appropriate difference from BC Hydro’s net metering tariff, in which the price for annual net inflow energy is based on the energy price under BC Hydro’s Standing Offer Program.”* and that they;

*“are satisfied that the site inspection fee is capped at \$500 and that FortisBC would provide an estimate of the amount of a site inspection fee (if any) to the potential customer generator in advance of the site inspection.”*

While BCSEA, *et al* see it as appropriate that the Commission require FortisBC to file a monitoring and evaluation report on FortisBC’s net metering program, at a lower level of detail than the 2005 BC Hydro report, their support for the Application is clear in their conclusion:

*BCSEA, et al support FortisBC’s Net Metering Application.*

4. The Final Submission of Buryl Slack indicates general support for the Application and states that, “heading in the right direction – despite all the ramifications.”
5. In its Final Submission, Resolution continued to express its desire for the inclusion of program features that would spur more “aggressive adoption”. It would like to see more

detail on the site inspection process and the metering requirement, especially as it pertains to the compatibility of the systems with future Feed-in Tariffs. FortisBC notes that the site inspection was discussed in the responses to OEIA Information Requests 9.1 and 9.2 where it was explained that customer-generators would be contacted prior to the inspection taking place. FortisBC is not aware of any pending Feed-In Tariffs in British Columbia and submits that its Application is appropriate for the scale of installations accommodated by the Program.

6. Resolution states that it agrees with FortisBC's assessment of Program participation rates and the reasonableness of spreading costs across the entire customer base.
7. Resolution Electric supports the Application as stated in the final paragraph of its Final Submission:  
  
*Resolution Electric Ltd. is of the opinion that the FortisBC (sic) Net Metering Document (Exhibit B1 ) submitted on April 28 - 2009 is in keeping with the Government of BC Energy Plan for electricity self sufficiency and should therefore be accepted on this basis.*
8. The BCOAPO supports the FortisBC Net Metering Application.
9. The OEIA stated that its support for the FortisBC Net Metering Program is conditional on the inclusion of a number of additional features not currently proposed by the Company including:
  - (a) The filing of a net metering report that includes a report of world-wide programs that offer premiums;
  - (a) The implementation of a demand side management program the reduces the payback period of the program for customers to 30 years; and
  - (b) A commitment by FortisBC to prepare a future Application in response to the release of a Government or Commission policy regarding a potential incentive.
10. Should the BCUC require FortisBC to file a report on its Net Metering Program at some point in the future, the Company will include information as set forth in the report requirements. However, the Company believes that the report should be restricted to a discussion of the program particulars rather than a wide reaching analysis of the state of net metering programs in general.

11. FortisBC will be filing a long-term DSM plan in 2010. This plan is the appropriate place for a discussion of potential DSM programs.
12. As discussed in the response to OEIA IR 7.5.1, FortisBC will consider future policy developments when they are released. Any FortisBC response to specific Commission or Government policy will depend on the nature of the policy itself and cannot be committed to in advance.

**C. CONCLUSION**

13. No intervenor has indicated that the FortisBC Net Metering Application should not be approved.
14. With the exception of the OEIA, which expressed only conditional support, all intervenor final submissions recommend that the Application be approved.
15. FortisBC submits that no issue was raised during either the Public Consultation, Information Request or Argument phases of the regulatory process surrounding the Application that would suggest that it should not be approved.
16. The Program meets the requirements of the Utilities Commission Act, and, for the reasons set out above and in the Application, is not unjust or unreasonable within the meaning of the Act.
17. For the reasons discussed above, FortisBC respectfully submits that its Net Metering Program, as amended during the Information Request process, is in the public interest and should be approved.

ALL OF WHICH IS RESPECTFULLY SUBMITTED



---

Dennis Swanson  
Director, Regulatory Affairs