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February 26, 2015

<u>Via Email</u> Original via Mail

British Columbia Utilities Commission Sixth Floor 900 Howe Street Vancouver, B.C. V6Z 2N3

Attention: Ms. Erica M. Hamilton, Commission Secretary

Dear Ms. Hamilton:

Re: FortisBC Energy Inc. (FEI)

Application for 2015 and 2016 Revenue Requirements and Rates for the Fort Nelson Service Area (the Application)

FEI Request for an Amendment to the Regulatory Timetable

FEI writes to respectfully request an amendment to the Regulatory Timetable set out in the British Columbia Utilities Commission (the Commission) letter dated February 17, 2015 (Exhibit A-5), for the reasons set out below.

In Exhibit A-5, the Commission Panel stated that:

"...the Panel considers it necessary to have a <u>brief</u> second round of IRs to obtain further information on a few limited topics, particularly with regards to the non-Muskwa River Crossing Project capital expenditures forecast to be incurred in 2015. While not limiting the scope of IR No. 2, the Panel is mindful of balancing a fulsome evidentiary record with regulatory efficiency and thus encourages parties to only utilize IR No. 2 where necessary."¹ [emphasis added]

¹ Exhibit A-5, page 2.



On February 25, 2015, FEI received IR No. 2 from the Commission, containing 38 questions, and from the Commercial Energy Consumers Association of British Columbia (CEC), containing 57 questions.

Upon review of the questions from CEC IR No. 2, FEI was disappointed as FEI is mindful of and concerned about the regulatory review process cost impacts to Fort Nelson customers. Since the Panel encouraged parties to utilize IR No. 2 only where necessary, the extent of the CEC IRs is surprising given the CEC's submission on process that, in fact, no further IRs were necessary. The CEC stated in Exhibit C3-3:

"Having reviewed the Application and responses to the Information Requests, the CEC is prepared to proceed to the Final Argument stage and submits that written argument is appropriate for this proceeding."

Despite this submission, CEC appears to have taken this as an opportunity to ask a further 57 questions related to Demand Forecasting, managing rate volatility, and O&M, which go beyond the limited topics identified by the Panel in Exhibit A-5.

Request for Amendment to the Regulatory Timetable

The Regulatory Timetable established by the Commission in Exhibit A-5, sets March 4, 2015, as the date for FEI to file its responses to IRs No. 2, which is one week. Given the volume of IRs received in round 2 (95 questions), FEI will not be able to prepare and file responses within the existing timetable.

FEI is proposing an amendment to the Regulatory Timetable, due to the fact that FEI faces significant resource constraints, given that the personnel working on this Application are also the same personnel working on the many other ongoing regulatory review processes which all have compounding regulatory timetable deadlines. FEI is currently managing preparing responses to approximately 1,500 IRs, with further IRs arriving next week for the FortisBC Inc. (FBC) Annual Review of 2015 Rates. The current ongoing processes with conflicting personnel include: (1) the inclusion of FortisBC Energy (Vancouver Island) Inc. and FortisBC Energy (Whistler) into the FEI 2014-2019 Performance Based Ratemaking Plan; (2) the FEI Annual Review of 2015 Rates; (3) the FBC Annual Review of 2015 Rates; and (4) the FEI Lower Mainland Intermediate Pressure System Upgrade Projects Certificate of Public Convenience and Necessity.

Taking into consideration the deadlines from the other ongoing proceedings and the spring break period which affects all parties, FEI proposes the following Amended Regulatory Timetable.

ACTION	DATE (2015)
FEI Response to Commission IR No. 2	Tuesday, March 31
FEI Final Written Submission	Tuesday, April 14
Intervener Final Written Submissions	Tuesday, April 28
FEI Reply Written Submissions	Tuesday, May 12



If further information is required, please contact the undersigned.

Sincerely,

FORTISBC ENERGY INC.

Original signed by:

Diane Roy

cc (email only): Registered Parties