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October 6, 2015

Via Email
Original via Mail

British Columbia Utilities Commission
6th Floor, 900 Howe Street
Vancouver, BC
V6Z 2N3

Attention: Ms. Erica M. Hamilton, Commission Secretary

Dear Ms. Hamilton:

Re: FortisBC Energy Inc. (FEI)
2015 System Extension Application (the Application)
FEI Submission on Further Process

Pursuant to the Regulatory Timetable established in the British Columbia Utilities Commission (the Commission) Order G-143-15 and Commission Letter Log No. 50563 (the Letter), FEI makes the following submission, in advance of the October 9 deadline, on the questions outlined by the Commission in the Letter:

1. *Is a second round of written information requests (IRs) required?*

FEI does not believe a second round of IRs is required. The evidence on the record currently, as developed through the review process, is substantial and clear. In addition to the Application and appendices to the Application, FEI has completed extensive stakeholder consultation and filed responses to 471 IRs to clarify and expand on the information provided in the Application and appendices. Together they provide the Commission with the information it needs to make a determination on the approvals sought, and therefore, FEI believes that the regulatory review process could simply proceed to the written argument phase.

2. *Considering the Commission's Streamlined Review Process Policy, Guidelines and Procedures, is a Streamlined Review Process (SRP) appropriate?*

If the Commission determines that further process is required, FEI believes that holding an SRP will be the most appropriate way to complete the regulatory review for the following reasons:

- The Application does not involve particularly contentious issues. The Application is limited in scope in that it does not seek to change the fundamental structure of the existing Main Extension Test or the Service Line Cost Allowance. FEI has applied for certain updates to the Test and proposed a reporting structure that will reflect and achieve the Commission's intent, "to determine if the aggregate PI thresholds need to be adjusted on a go forward basis in order to achieve the aggregate PI of 1.1", as stated in the 2007 Decision.¹ The IRs covered technical, regulatory, and legal questions; and in FEI's view, the responses to these questions provide sufficient clarification and further information that will likely resolve most, if not all, of the issues raised during the review process. FEI believes that if there are any remaining concerns or issues, those can be most effectively dealt with at an SRP, which allows for two-way dialogue among the parties.
- The Application does not pose policy issues about which there is no established Commission precedent. The Application follows system extension policies and guidelines established from previous Commission decisions. Although there were IRs about whether the proposed updates to the Test continue to follow the Commission's guidelines, the Application does not pose, or tend to establish, broader or new policy issues. Indeed, FEI has decided to leave certain policy issues, such as expansion of natural gas to off-system communities, outside this Application.
- Ten parties are registered to intervene, nine of which have previously participated in the stakeholder consultation and three of which have asked IRs. Most potential participants will have a good foundation to understand the issues and can participate in an SRP effectively.
- In section 1.2 of the Application, FEI recommended an SRP following IRs. The reasons stated in the Application continue to support an SRP.

3. *If an SRP were held, indicate whether you plan to attend and, if so, provide dates in late October and early November that you are available.*

FEI is available for and proposes a range of dates including October 27, 28, 29 or 30 or November 5 or 6 for an SRP, should the Commission determine one to be necessary.

¹ Order G-152-07 and accompanying Decision on the System Extension and Customer Connection Policy Review Application (2007 Decision), at pages 36-37.

4. Any other procedural matters that are pertinent to the Application.

FEI does not have any additional procedural matters to raise at this time.

If further information is required, please contact Brent Graham at 604-592-7857.

Sincerely,

FORTISBC ENERGY INC.

Original signed by: Ilva Bevacqua

For: Diane Roy

cc (email only): Registered Parties