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April 22, 2016

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

Attention: Ms. Laurel Ross, Acting Commission Secretary and Director

Dear Ms. Ross:

**Re: FortisBC Energy Inc. (FEI)**  
**Project No. 3698840**  
**2015 System Extension Application (the Application)**  
**British Columbia Utilities Commission (BCUC or the Commission) Exhibit A-10**  
**– FEI Reply Submission**

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FEI is responding to Intervener submissions on items A and B of Exhibit A-10 which requested submissions on the following:

- A. Considering Appendix 1 and the Commission's Streamlined Review Process Policy, Guidelines and Procedures, FEI's views on whether a streamlined review process (SRP) is still appropriate to address issues raised in the Panel information request as well as identification of those issues FEI proposes be covered by an SRP; and
- B. Proposed dates for an SRP, if one were to be held.

Submissions were made by the British Columbia Public Interest Advocacy Centre representing the British Columbia Old Age Pensioners' Organization, Active Support Against Poverty, Disability Alliance BC, Council of Senior Citizen's Organizations of BC, and the Tenant Resource and Advisory Centre *et al.* (BCOAPO), Commercial Energy Consumers Association of British Columbia (CEC) and B.C. Sustainable Energy Association and the Sierra Club of B.C. (BCSEA). All three Interveners have requested at least some further process, although none advocates a full, traditional SRP, FEI submits that an SRP is not appropriate and, the Commission should proceed directly to a Decision.

### **An SRP is not Warranted in Light of the Guidelines**

The purpose of an SRP is to expedite the process and improve regulatory efficiency.<sup>1</sup> An SRP is also intended to achieve “a full evidentiary record.”<sup>2</sup> An SRP will, at this point, add time and process to a process that has already been underway for over two years. Adding an SRP to the already lengthy process would provide limited, if any, benefit.

A full evidentiary record exists. As discussed in Exhibit B-12, FEI has already held four all-day workshops with stakeholders and has answered more than 800 Information Requests (IRs) related to the Application. Detailed submissions have been provided by all parties.

Intervener support for the Application is well documented, as summarized in the Company’s Reply Submission:

This Application is one of those notable occasions where there is unanimity regarding the merits of a utility initiative. After extensive consultation and workshops to discuss the objectives and components of the MX test, all participants have emerged in their conviction that the MX Test must be adjusted to ensure that it is fairer to new customers. Everyone agrees that conservative parameters of the MX Test are resulting in potential customers paying more than their fair share to access natural gas service.<sup>3</sup>

### **The Panel’s Request for Additional Information Has Been Addressed**

The Company has met the intent of Panel IRs; that is, to provide additional information and clarity regarding three categories of questions: 1) inclusion of appropriate costs and revenues in the Rate Impact Analysis; 2) MX Test and SLCA inputs and methodologies; and 3) variances in past service line cost and main extension commercial consumption estimates and whether/how they should be addressed prospectively. At this stage of the process, and with the amount of evidence on the record now, any oral process that is contemplated should be confined to a technical hearing at which FEI responds to questions from the Panel to explain information contained in the Company’s response to Panel IR1. If such a process is used, it should be kept brief and directed to clarification only and not advocacy by the parties, since the parties have had ample opportunity to make argument already. FEI agrees with BCSEA’s submission<sup>4</sup> that a transcript would be required if the Commission decides to pursue a limited technical workshop.

FEI acknowledges the request of Interveners to provide further written submissions. The responses to Panel IR1 provided technical analysis of data already on the record and do not alter the conclusions in this proceeding. As such, FEI submits that the written submissions already on the record remain relevant and should not require amendment. If the Commission believes further submissions are appropriate, FEI submits that they should be restricted to specific issues identified by the Panel and related to the Panel IRs.

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<sup>1</sup> Appendix A to Order G-37-12, p.4: “The Streamlined Review Process is intended to expedite the flow of information between the Applicant, Registered Interveners and the Commission by incorporating the benefits of a workshop, information requests and an oral hearing into one efficient process.”

<sup>2</sup> IBID, p.5.

<sup>3</sup> Reply Submission of FortisBC Energy Inc. dated December 17, 2015, p. 1.

<sup>4</sup> Exhibit C-6-6, p.3.

## **Conclusion**

FEI respectfully submits that an SRP is not required and the Commission should proceed directly to a Decision. If the Commission decides to invite written submissions from Interveners specific to FEI's responses to Panel IRs, FEI proposes the following timeline:

Intervener Submissions on Panel IR1	May 6, 2016
FEI Reply Submission on Panel IR1	May 13, 2016

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

Sincerely,

**FORTISBC ENERGY INC.**

***Original signed:***

Diane Roy

cc (email only): Registered Parties