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May 27, 2016

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

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

Dear Ms. Ross:

**Re: FortisBC Energy Inc. (FEI or the Company)**  
**Project No. 3698874**  
**Customer Choice Program Cost Recovery Application (the Application)**  
**FEI Submission on Process**

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Pursuant to the British Columbia Utilities Commission (the Commission) Order A-3-16, FEI makes the following submission on process.

FEI submits that the review of this Application should follow a written hearing process. As explained in Section 1.3<sup>1</sup> of the Application, a written process consistent with historical Customer Choice proceedings can capably address the straightforward issues noted in the Application. Further, a written approach will likely be less expensive to administer than the proposed modified Streamlined Review Process (SRP). Lastly, the approach is better suited to deal with confidential Gas Marketer fee and market share information.

For efficiency, FEI recommends holding an information session prior to the Information Requests process in order to explain the cost allocation methodology used in the Application. For clarity, FEI is of the opinion that discussion at this session would be limited to addressing questions about the methodology to ensure interveners understand the proposed options.

In summary, FEI believes that a modified SRP is not the best approach for reaching a decision on the Application for the following reasons:

1. The issues presented in the Application are not complex and, in the view of FEI, do not warrant a more expensive, in-person review process that involves legal counsel.

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<sup>1</sup> Application for Customer Choice Cost Recovery – Analysis and Recommendation dated April 14, 2016, Section 1.3, p.4, lines 12-18.

The Application simply requires evaluating existing costs and determining how those costs should be allocated between the Company and the Gas Marketers. Retaining counsel and requiring the Commission Panel attend a half-day meeting is not commensurate with the magnitude of the issues presented in the Application.

2. There remains confidential information provided in Section 5.6<sup>2</sup> of the Application which, if revealed, would expose individual Gas Marketer transaction fees and market share information. This confidential material limits the practicality of a modified SRP.
3. Given the uncomplicated nature of the issues addressed in the Application, FEI respectfully suggests that a written hearing process is most efficient, with one round of information requests.

FEI submits the following dates for the Regulatory Timetable involving a written process:

<b>ACTION</b>	<b>DATES (2016)</b>
Information session for interveners and interested parties	Thursday, June 23
Commission Information Request No. 1	Thursday, June 30
Intervener Information Request No. 1	Thursday, July 7
FEI response to Information Requests No. 1	Thursday, July 21
FEI Written Final Argument	Thursday, August 4
Intervener Written Final Argument	Thursday, August 11
FEI Written Reply Argument	Thursday, August 25

If the Commission determines that a modified SRP is more appropriate, FEI proposes the following dates for the Regulatory Timetable:

<b>ACTION</b>	<b>DATES (2016)</b>
Commission Information Request No. 1	Thursday, June 16
Intervener Information Request No. 1	Thursday, June 23
FEI Response to Information Requests No. 1	Thursday, July 7
Modified Streamlined Review Process	Thursday, July 21
FEI Written Final Argument	Thursday, August 4
Intervener Written Final Argument	Thursday, August 11
FEI Written Reply Argument	Thursday, August 25

<sup>2</sup> Application for Customer Choice Cost Recovery – Analysis and Recommendation dated April 14, 2016, Section 5.6, p.31-38.

If further information is required, please contact Scott Webb, Manager Customer Programs and Research at 604-592-7649.

Sincerely,

**FORTISBC ENERGY INC.**

***Original signed:***

Diane Roy

cc (email only): Registered Parties