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December 13, 2017

British Columbia Utilities Commission  
Suite 410, 900 Howe Street  
Vancouver, BC  
V6Z 2N3

Attention: Mr. Patrick Wruck, Commission Secretary and Manager, Regulatory Support

Dear Mr. Wruck:

**Re: FortisBC Energy Inc. (FEI)  
2016 Rate Design Application (the Application) - Project No. 3698899  
FEI Submission on Further Process**

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Further to Order G-109-17, FEI writes to provide its comments on further process in this proceeding.

The only intervener to file comments on further process was the Commercial Energy Consumers Association of British Columbia (CEC). The CEC states that it is satisfied with moving directly to written argument, and proposes that FEI file its argument in the last week of January and interveners file their arguments mid-February.<sup>1</sup> FEI is in agreement with the CEC.

FEI believes that proceeding to written argument is appropriate at this time. FEI notes the following:

- FEI held a robust stakeholder engagement process which informed the content of the Application and provided an opportunity for stakeholders to gain an understanding of FEI's proposals.<sup>2</sup>
- FEI's Application was complete and clearly explained all of its proposals, with detailed supporting evidence.<sup>3</sup>
- Two workshops were held after the filing of the Application to familiarize all stakeholders with the content of FEI's proposals.<sup>4</sup>

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<sup>1</sup> Exhibit C6-7.

<sup>2</sup> Exhibit B-1, Appendix 4.

<sup>3</sup> Exhibits B-1 to B-1-3.

- There has been two full rounds of information requests, providing ample opportunity for further questions to be asked and answered.<sup>5</sup>
- There has been opportunity for stakeholders to file letters of comment.<sup>6</sup>
- There have been two expert reports filed by Elenchus, and a separate round of information requests on each of the Elenchus reports. This has provided a robust third-party, expert review of FEI's rate design proposals.<sup>7</sup>
- The two streamlined review processes on the COSA studies and Transportation Service Review, including a round of technical information requests, oral testimony and written or oral submissions, narrow the scope of the remaining topics to be covered, and have arguably addressed the most contentious issues in this proceeding.<sup>8</sup>
- Following BCOAPO's letter dated December 5, 2017, in which BCOAPO indicated that "it was not prudent to proceed to finalize and file the evidence they originally intended to present in this process,"<sup>9</sup> no intervener intends to file evidence in the proceeding.

Given the above, FEI believes that the evidentiary record is sufficient and that further evidentiary process will not materially aid the Commission in reaching a conclusion in this proceeding.

To give sufficient time for the preparation of final argument after the holiday season, FEI proposes Friday, January 26, 2018, as the date for its final argument. Based on CEC's suggested timing, intervener final argument could be Friday, February 16, 2018, and FEI reply argument on Friday, March 9, 2018.

If further information is required, please contact the undersigned.

Sincerely,

**FORTISBC ENERGY INC.**

***Original signed:***

Diane Roy

cc (email only): Registered Parties

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<sup>4</sup> Transcript Volumes 1 and 2.

<sup>5</sup> Exhibits B-5 to B-11 and B-21 to B-27.

<sup>6</sup> Exhibits D-5-1 and E-1.

<sup>7</sup> Exhibits A2-2, A2-5 to A2-17.

<sup>8</sup> Transcript Volumes 4, 5 and 6.

<sup>9</sup> Exhibit C3-8.