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November 15, 2018

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)

Application for Use of Lands under Sections 32 and 33 of the *Utilities Commission Act* (UCA) in the City of Coquitlam for the Lower Mainland Intermediate Pressure (IP) System Upgrade (LMIPSU) Projects – Coquitlam Gate IP Project (Project) (the Application)

FEI Information Requests (IR) to the City of Coquitlam on Phase Two Evidence

On June 28, 2018, FEI filed the Application noted above. In accordance with British Columbia Utilities Commission Order G-190-18 establishing the regulatory timetable for Phase Two of the proceeding, attached please find FEI's IRs to the City of Coquitlam on Phase Two Evidence.

If further information is required, please contact Ilva Bevacqua at 604-592-7664.

Sincerely,

FORTISBC ENERGY INC.

Original signed:

Diane Roy

Attachments

cc (email only): Registered Parties

FortisBC Energy Inc. (FEI) Application for Use of Lands under Sections 32 and 33 of the <i>Utilities Commission Act</i> in the City of Coquitlam for the Lower Mainland Intermediate Pressure System Upgrade (LMIPSU) Projects ~ Project No. 1598963 (the Application)	Submission Date: November 15, 2018
FEI Information Request (IR) No. 1 to City of Coquitlam (City) on Phase Two Evidence	Page 1

1 **1.0 Reference: Exhibit B-12, FEI Evidence**

2 On page 20 FEI states:

3 FEI has previously indicated its willingness to remove the 380 metres of the
4 abandoned NPS 20 IP gas line. However, FEI has not agreed to the City's
5 proposal that FEI bear the entire cost of this removal. In the City's letter dated
6 September 20, 2018, the City suggests that FEI should remove the entire 5.5
7 kilometre length of the NPS 20 IP gas line in the future. FEI is prepared to
8 undertake the removal of any portion of the NPS 20 IP gas line, including either
9 380 metres or 5.5 kilometres in accordance with the Operating Agreement if the
10 City exercises its rights under the Operating Agreement and requests such a
11 removal.

12 The Operating Agreement gives the City the right to request that FEI remove
13 abandoned pipe but also contains an allocation methodology that makes the City
14 responsible for a portion of those removal costs.

15 On page 36 FEI states:

16 FEI is prepared to remove all or portions of the NPS 20 IP gas line if the City
17 exercises its rights under the Operating Agreement to request such a removal,
18 which has not occurred.

19 1.1 Has the City requested that FEI remove 380 metres of the NPS 20 IP gas line
20 under the Operating Agreement?

21 1.2 Has the City requested that FEI remove 5.5 kilometres of the NPS 20 IP gas line
22 under the Operating Agreement?

23

24 **2.0 Reference: Exhibit C1-8, City Evidence**

25 On page 6 the City states:

26 The National Guide to Sustainable Municipal Infrastructure published a paper
27 that surveyed practices that exist across the country for coordinating
28 infrastructure works. A copy of this paper is attached at Appendix D. The paper
29 highlights the problems associated with the waste and inefficiency where a road
30 is dug up and repaved, only to be dug up again a short time later, and
31 emphasizes a coordinated approach. The net effect of improved coordination

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FEI Information Request (IR) No. 1 to City of Coquitlam (City) on Phase Two Evidence	Page 2

1 includes reduced project costs through efficiencies of scale and avoidance of
2 repeat repair costs (e.g. repeated pavement repair).

3 The City believes that sooner or later FEI will have to remove the entire
4 approximately 5.5 km of NPS 20 Pipeline to make space for other utility projects
5 that support the public interest (e.g., water mains, sewers, electrical conduits for
6 street lighting and traffic signals, telecommunications, etc.). Coquitlam is one of
7 the fastest growing municipalities in greater Vancouver. The projected rapid
8 growth and development in Coquitlam, in particular in the Burquitlam area, will
9 only increase the need for underground space for additional utilities to serve this
10 growth.

11 On page 7 the City states:

12 The City believes that the preferred and most cost-effective approach is for FEI
13 to remove the entire 5.5 km of NPS 20 Pipeline as soon as possible (i.e., when
14 the NPS 30 Pipeline is in service), rather than fill it with concrete and then
15 remove it separately in the future.

16 2.1 Has the City considered whether the space left by the suggested removal of the
17 NPS 20 IP gas line, or portions thereof, would be negatively impacted or
18 unfeasible for use due to excessive depth, or insufficient spacing or offset to
19 other adjacent utilities?

20 2.2 In what year(s) does the City anticipate requiring the use of the entire 5.5
21 kilometre NPS IP 20 route?

22 2.3 Please describe the works for which the City requires use of the entire 5.5
23 kilometre NPS IP 20 route.

24 2.4 What other alternatives and alternative routes were considered by the City for
25 these works?

26 2.4.1 When were these alternatives and alternative routes considered?

27 2.5 Please provide copies of any alternatives analysis conducted by the City.

28 2.6 Is it possible for the City to proceed with some or all of the works without
29 relocating the NPS 20 IP gas line in some or all of the locations along the 5.5
30 kilometre route?

31 2.7 At what stage are the City's plans for these works?

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FEI Information Request (IR) No. 1 to City of Coquitlam (City) on Phase Two Evidence	Page 3

- 1 2.7.1 Has the budget for this work been approved?
- 2 2.7.1.1 If not, why?
- 3 2.7.2 Has a request for proposals or tendering for this work been initiated by
- 4 the City?
- 5 2.8 If it is not the City's intent to use this space immediately after the suggested
- 6 removal of the NPS 20 IP gas line, how would the City mitigate the "problems
- 7 associated with the waste and inefficiency where a road is dug up and repaved,
- 8 only to be dug up again a short time later..." that are mentioned in the National
- 9 Guide to Sustainable Municipal Infrastructure's paper?
- 10 2.9 Does the City agree that if it does not intend to use the space immediately after
- 11 the suggested removal of the NPS IP 20 gas line, or ends up utilizing a different
- 12 location along the Como Lake Avenue corridor, that traffic and community
- 13 impacts would be significantly greater as compared to if the City and FEI adopted
- 14 a coordinated and concurrent approach to the suggested removal of the NPS 20
- 15 IP gas line and the City's potential future municipal utility infrastructure plans?
- 16 2.9.1 If not, why?
- 17 2.10 Does the City agree that there would be fewer traffic impacts and impacts to the
- 18 community if the suggested removal of the NPS 20 IP gas line occurred at the
- 19 same time as the City's proposed works?
- 20 2.10.1 If not, why?
- 21 2.11 Does the City agree that a more cost-effective approach would be to abandon
- 22 the NPS 20 IP gas line in place, rather than removing the entire 5.5 kilometres of
- 23 NPS 20 IP gas line as soon as possible after installation of the NPS 30 IP gas
- 24 line?
- 25 2.11.1 If not, why?
- 26 2.12 Does the City see value in coordinating a concurrent approach to the suggested
- 27 removal of the NPS 20 IP gas line and its municipal utility infrastructure plans?
- 28 2.12.1.1 If not, why?

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FEI Information Request (IR) No. 1 to City of Coquitlam (City) on Phase Two Evidence	Page 4

1

2 **3.0 Reference: Exhibit C1-8, City Evidence**

3 On page 2 the City states:

4 This space is needed by the City for the installation of its new 250mm water main
5 and 450mm sanitary sewer, which the City has deferred the installation of to
6 avoid having to relocate the NPS 20 Pipeline while it remains in service.

7 3.1 What other alternatives and alternative routes were considered by the City for the
8 installation of the proposed 250 mm water main and 450 mm sanitary sewer?

9 3.1.1 When were these alternatives and alternative routes considered?

10 3.1.2 Please describe the technical, cost and schedule differences between
11 alternatives and alternative routes.

12 3.1.3 Please provide copies of any alternatives analysis conducted by the City.

13 3.2 Is it possible for the City to proceed with installation of a 250 mm water main and
14 450 mm sanitary sewer without relocating or removing the NPS 20 IP gas line?

15 3.2.1 If not, why?

16 3.3 In what year(s) does the City anticipate installing its new 250 mm water main and
17 450 mm sanitary sewer?

18 3.3.1 At what stage are the City's plans for this work?

19 3.3.1.1 Has the budget for this work been approved? If not, why?

20 3.3.1.2 Has a request for proposals or tendering for this work been
21 initiated by the City?

22

23 **4.0 Reference: Exhibit C1-8, City Evidence**

24 On page 9 the City states:

25 The City believes that FEI's position does not have due regard to the following
26 causes of damage to the Como Lake Avenue curb lanes:

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FEI Information Request (IR) No. 1 to City of Coquitlam (City) on Phase Two Evidence	Page 5

- 1 • numerous lateral cuts for relocation of many of the more than 800 lateral
2 utilities and other services that cross the Project route (as described above);
- 3 4.1 By “Project route”, does the City mean Como Lake Avenue or the trench for the
4 NPS 30 IP gas line?
- 5 4.2 What does the City mean by “cuts for relocation”?
- 6 4.3 Does the City agree that the trench for the NPS 30 IP gas line will not cross all
7 800 of the lateral utilities and other services?
- 8 4.3.1 If not, why?
- 9 4.4 Does the City agree that not all of the lateral utilities and other services crossed
10 by the trench for the NPS 30 IP gas line will need to be cut?
- 11 4.4.1 If not, why?
- 12 4.5 Is it the City’s standard practice to conduct curb to curb paving its own lateral
13 utility or service cuts?
- 14 4.5.1 If yes, please provide the standard.
- 15 4.5.2 If yes, please provide evidence where this standard has been applied
16 consistently.
- 17 4.6 Is it the City’s standard practice to require other third party utilities to undertake
18 curb to curb paving following lateral utility or service cuts?
- 19 4.6.1 If yes, please provide the standard.
- 20 4.6.2 If yes, please provide details about where such curb to curb paving has
21 been required and how often is has been the case.

22

23 **5.0 Reference: Exhibit B-12, FEI Phase 2 Additional Evidence, Appendix B**

24 On page 9 the WSP Report states:

25 Depending on these factors, the distresses evident in a pavement, and the level
26 of service expectations of the municipality, the typical service life of a municipal
27 arterial pavement in the Lower Mainland region can likely range between 12 to

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FEI Information Request (IR) No. 1 to City of Coquitlam (City) on Phase Two Evidence	Page 6

- 1 40 plus years, with many arterial pavements typically seeing rehabilitation cycles
2 in the range of 20 to 30 years.
- 3 5.1 Does the City agree that this is an accurate description of the service life of
4 arterial pavement in the Lower Mainland?
- 5 5.1.1 If not, why?
- 6 5.2 Does the City agree that this description would apply to Como Lake Avenue?
- 7 5.2.1 If not, why?
- 8 5.3 Does the City agree that the WSP Report will help clarify whether any post-utility
9 construction pavement damage was likely a result of FEI construction activities or
10 related to pre-existing conditions within the Project work area on Como Lake
11 Avenue?
- 12 5.3.1 If not, why?
- 13 5.3.2 If the City does not agree, what additional information should be gathered
14 or provided to access the pre-utility construction condition of Como Lake
15 Avenue?
- 16
- 17 **6.0 Reference: Exhibit B-12, FEI Phase 2 Additional Evidence, Appendix B**
- 18 On page 9 the WSP Report states:
- 19 In our opinion, based on the observed surface conditions of the pavements,
20 including the type, severity, and scope of distresses observed along Como Lake
21 Avenue and Spuraway Ave, several sections of these roadways will likely need a
22 full width rehabilitation treatment or extensive repairs within the next five to ten
23 years.
- 24 6.1 Does the City agree that this is an accurate assessment of the surface condition
25 of Como Lake Avenue?
- 26 6.1.1 If not, why?
- 27 6.2 Has the City conducted any assessments regarding the surface condition of
28 Como Lake Avenue roadway?
- 29 6.2.1 If yes, please provide copies of the assessments.



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FEI Information Request (IR) No. 1 to City of Coquitlam (City) on Phase Two Evidence	Page 7

1 6.3 Has the City prepared any rehabilitation plans with respect to the Como Lake
2 Avenue roadway?

3 6.3.1 If yes, please provide the City’s plans and schedule for rehabilitation by
4 section of road along Como Lake Avenue to address current assessed
5 condition.

6