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May 9, 2012

Via Email

Ms. Alanna Gillis
Acting Commission Secretary
BC Utilities Commission
Sixth Floor, 900 Howe Street, Box 250
Vancouver, BC V6Z 2N3

Dear Ms. Gillis:

Re: Generic Cost of Capital Proceeding Order No. G-20-12 (Project No. 3698660)

The Industrial Customers Group (ICG) of FortisBC Inc. provides the following submissions regarding matters raised in Appendix A to Order G-50-12 dated April 19, 2012.

1. Allocation of Participant Assistance/Cost Awards

The ICG supports the allocation of Participant Assistance/Cost Awards on the same basis as outlined in Order F-5-06.

2. Participant Assistance/Cost Awards Eligibility

The ICG expects to be an active participant in this proceeding, and plans to file expert evidence. The ICG also expects to apply for participant assistance.

The ICG believes that the Commission Panel will benefit from the active participation of several customer groups that may bring a variety of perspectives to the broad range of issues raised in the “Preliminary Minimum Filing Requirements for Affected Utilities” attached as Appendix B to Order G-50-12. In particular, the ICG believes that it may be helpful to the Commission Panel to hear the evidence of expert witnesses that may not have appeared before the Commission in previous cost of capital proceedings. Moreover, customer groups will not necessarily take the same position regarding the broad range of issues to be considered in this proceeding, including whether or not an automatic adjustment mechanism should be reintroduced in British Columbia. Therefore, the ICG believes that established customer groups should not be required to join together.

3. Draft Preliminary Regulatory Timetable

The ICG comments regarding the Draft Preliminary Regulatory Timetable are limited to the need for IR No. 2 and the timing of the Procedural Conference. The ICG believes that the Commission Panel should now conclude that Interveners should have an opportunity to file IR No. 2 on Affected and Other Utilities' Evidence and Submissions. The ICG recommends that the Commission Panel then change the date of the Procedural Conference from July 31, 2012 to the week of October 15, 2012. With that change, the Procedural Conference would be held with the benefit of all the evidence having been filed, including Intervener evidence.

Yours truly,

(original signed)

Robert Hobbs