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British Columbia Utilities Commission
Sixth Floor, 900 Howe Street, Box 250
Vancouver, BC, V6Z 2N3
Attn: Erica Hamilton, Commission Secretary
By Web Posting

Dear Madam:

Re: FortisBC Inc. (FBC, Application for a Certificate of Public Convenience and Necessity (CPCN) for the Advanced Metering Infrastructure (AMI) Project
Project No. 698682; Order G-105-12
Reply regarding Request for Third Round of Information Requests

This is the reply submission of the B.C. Sustainable Energy Association and the Sierra Club of British Columbia, in reply to FortisBC Inc.'s January 16, 2013 letter to the Commission¹ responding to requests by BCSEA-SCBC² and certain other intervenors for a third round of information requests.

This reply is limited to the three specific topics regarding which BCSEA-SCBC asked for a third round of information requests.

1. opt-out program (for example, as discussed in Exhibit B-14, BCUC IR 50.2)

FBC does not oppose this request. No reply is required.

2. "wireless vs. wired (PLC in particular)" options for the whole system (as distinct from 'wired' as a component of an opt-out program)

FBC responds regarding this topic (wired vs. wireless option) under heading 4 beginning on page 2 of its Response. FBC says that the two rounds of information requests on this topic are sufficient and that a third round would not be productive and is not warranted. FBC says that pursuant to Order G-198-12³ it anticipates a further evidentiary filing early in the week of January 21 "addressing the 'wired' market and the issues with obtaining comparative information in the absence of a formal PLC-specific Request for Proposal process."⁴ FBC also provides statistics in support of its assertion that there have been few wired metering systems installed in North America since 2008.⁵

These reply comments do not address the merits of 'wired vs. wireless options.' The issues here are (a) ensuring that the Commission has the evidence it requires to make a decision on the

¹ Exhibit B-22.

² Exhibit C4-10.

³ Exhibit A-19.

⁴ Exhibit B-22, p.2.

⁵ Presumably, these statistics will be included in the evidence FBC says it intends to file in the week of January 21, 2013.

Application, while maintaining an efficient and effective proceeding; and (b) ensuring that the parties are afforded procedural fairness.

BCSEA-SCBC tend to agree with FBC's argument that the best evidence of the financial comparison of wired vs. wireless options is in the evidence that none of the proposals in response to FBC's request for proposals (RFP) contained a wired system. The statistics on relatively few of the recent metering systems in North America being wired systems support a conclusion that it is not unexpected or aberrant that all of the RFP responses were for wireless systems. Thus, there appears to be nothing more that FBC could add to the filed evidence concerning specifically the financial comparison of wired vs. wireless options.

Beyond the financial comparison of wired vs. wireless systems, two related issues are (a) whether FBC ought to have worded the RFP differently so as to in some way attract a firm proposal for wired option (and if so how that should affect the Commission's decision regarding the merits of the proposed wireless system), and (b) whether FBC could or should conduct a new RFP aimed at attracting one or more proposals for wired systems (and if so how that should affect the Commission's decision regarding the merits of the proposed wireless system). To clarify, BCSEA-SCBC are not expressing any view of the merits of those issues at this time.

Presumably, these two issues will be addressed by the evidence that, as noted above, FBC says it intends to file evidence next week "addressing the 'wired' market and the issues with obtaining comparative information in the absence of a formal PLC-specific Request for Proposal process." FBC says there should not be a further round of IRs on this evidence. BCSEA-SCBC respectfully disagree. In their view, procedural fairness is engaged. Even though the evidence will be filed at the suggestion of the Commission, the other parties ought to have an opportunity to test the evidence, either by way of cross-examination during the oral hearing or by way of a round of information requests.

3. ZigBee board in the meter

BCSEA-SCBC is content with the state of the record regarding "ZibBee board in the meter," and will address this topic in its final submissions.

Effects on the regulatory timetable

BCSEA-SCBC support FBC's request that any changes to the regulatory timetable related to additional IRs be made in such a way as to preserve the scheduled dates for the oral hearing.

All the above is respectfully submitted.

Yours truly,

William J. Andrews



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cc. Distribution List by email