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May 11, 2015

**Via Email**  
**Original via Mail**

British Columbia Utilities Commission  
Sixth Floor  
900 Howe Street  
Vancouver, B.C. V6Z 2N3

Attention: Ms. Erica M. Hamilton, Commission Secretary

Dear Ms. Hamilton:

**Re: Templeton DOC Limited Partnership (Templeton)**

**Application for an Exemption Pursuant to Section 88(3) of the Utilities  
Commission Act (UCA) for Re-sale of Natural Gas (the Application)**

**FortisBC Energy Inc. (FEI) Response to the British Columbia Utilities  
Commission (BCUC or the Commission) Information Request (IR) No. 1**

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On April 13, 2015, Templeton filed the Application referenced above. On May 4, 2015, the Commission issued BCUC IR No. 1 to FEI. In accordance with Commission Order G-68-15 setting out the Regulatory Timetable for the review of the Application, FEI respectfully submits the attached response to BCUC IR No. 1.

If further information is required, please contact the undersigned.

Sincerely,

**FORTISBC ENERGY INC.**

***Original signed by: Ilva Bevacqua***

**For:** Diane Roy

Attachment

cc (email only): [karl.gustafson@mcmillan.ca](mailto:karl.gustafson@mcmillan.ca)

Templeton DOC Limited Partnership (Templeton) Application for an Exemption Pursuant to Section 88(3) of the <i>Utilities Commission Act</i> , for Re-sale of Natural Gas at the McArthur Glen Designer Outlet at Vancouver International Airport (the Application)	Submission Date: May 11, 2015
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1   **1.0   Reference:   NATURAL GAS SERVICE**

2                           **Exhibit B-1, p. 2; FortisBC Utilities letter dated December 14, 2014**

3                           **Roof-top meter reading**

4           Fortis BC Energy Inc. (FortisBC) has advised that it did not wish to be responsible for  
5           facilities to deliver gas to the roof-top meters and that it will not read meters located on  
6           the roof... FortisBC will supply natural gas directly to Lessees of units in the Outlet  
7           Centre's food court - those Lessees are not part of the Retail Lessee group. The design  
8           of the food court space allows gas meters to be installed at ground level for each unit.<sup>1</sup>

9           On December 14, 2014, FortisBC Utilities filed a letter with the Commission titled 12  
10           Month Rolling Forecast of Anticipated Applications and Filings with the British Columbia  
11           Utilities Commission. The letter indicates that FortisBC Advanced Meter Reading CPCN  
12           will be filed with the Commission in Q4 2015.

13           1.1   Please confirm whether FortisBC currently serves customers with roof-top  
14           meters.

15  
16   **Response:**

17   FEI confirms that it serves customers with roof-top meters. This is a common occurrence.  
18   Meters are read by meter readers with customer-supplied keys allowing them to access the  
19   roof.

20  
21

22  
23                   1.1.1   If confirmed, please elaborate on how meter reading is performed on  
24                   existing FortisBC customers with roof-top meters.

25  
26   **Response:**

27   Please refer to the response to BCUC IR 1.1.1.

28   FEI's standard meter reading process is followed to read meters located on roof tops.

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<sup>1</sup> Exhibit B-1, p. 2.

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1                   1.1.2    If not confirmed, please provide examples of utilities in other  
2                                   jurisdictions that provide service to customers with roof-top meters, and  
3                                   explain how roof-top meter readings are conducted by those utilities.  
4

5    **Response:**

6    Please refer to the response to BCUC IR 1.1.1.

7  
8

9  
10               1.2    Please comment if FortisBC Vertical Subdivision Initiative has considered the  
11                                   challenges of roof-top metering as described in Templeton DOC Limited  
12                                   Partnership’s (Templeton LP) application.  
13

14   **Response:**

15    FEI does not see a challenge in the installation of, or ongoing meter reading of, roof-top meters.  
16    The vertical subdivision initiative was a result of efforts by FEI to meet the unique needs of  
17    developers and as a way for customers to be individually metered. In that initiative, FEI was  
18    able to locate meter closets and meter banks in basements, parkades, individual floors in  
19    residential towers and on roof tops. FEI works with the developer in determining a location for  
20    the meters that meets the needs of both FEI and the developer.

21    To FEI’s knowledge, there is nothing unique about the HVAC design or meter location  
22    requirements of the Templeton development that would preclude FEI from being able to install,  
23    individually meter, read and respond to emergencies at this location.  
24

25    Below are excerpts from FEI’s standards relevant to accessing, servicing, and responding to  
26    leaks and emergencies of roof top meters:  
27

28                   ***“DES 07-17 Locating Meter Sets***  
29                   ***Rooftop Locations***

30                   *If there is no other acceptable outside or recessed location, a rooftop location for a*  
31                   *residential or small commercial meter set (maximum 1000 series) may be permitted if*  
32                   *approved by Engineering and the area Operations manager...”*  
33

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1           **“OPM 03-01 System Leak Surveys**

2           *This document specifies the survey scope and the minimum frequencies of leak surveys*  
3           *that will be undertaken on all FortisBC (Natural Gas) (FBC (Gas)) owned or operated*  
4           *pipings, including meter set assemblies and all stations...”*

5

6           **“OPM 03-02 Gas Leak Classification and Response**

7           *This policy defines and describes gas leak conditions on FortisBC (Natural Gas) (FBC*  
8           *(Gas)) gas systems that are identified by our customers, the public, our employees or*  
9           *our contractors.*

10          *This document also describes the response requirements to these gas leak*  
11          *conditions...”*

12

13          **“OPM 03-21 Conducting Leak Surveys**

14          *This procedure describes how to conduct leak surveys in the field using the Approved*  
15          *Leak Survey Equipment/CGI or Barhole/CGI methods...”*

16

17          **“OPM 03-25 DP and IP Piping Replacement**

18          *This standard provides guidance with respect to the replacement of deteriorating or*  
19          *leaking DP and IP pipings, generally in the form of mains or services, and establishes*  
20          *requirements and procedures for the review and, if required, replacement of the*  
21          *pipings...”*

22

23

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26          1.3       In light of FortisBC’s plan to implement advanced meter reading, please  
27                   comment on whether advanced meter readings can alleviate the challenge of  
28                   providing service to customers with roof-top meters.

29

30          **Response:**

31          FEI is currently evaluating advanced meter reading options for our customers. Since FEI is still  
32          at the evaluation stage, no decision has been made as to the type of remote reading technology  
33          that may be used. However, it is likely that advanced metering systems would be able to  
34          wirelessly read meters on the top of a low rise building such as that contemplated in the  
35          Templeton application. However, as noted in the response to BCUC IR 1.1.1, FEI meter



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1 readers are also capable of manually reading the meters so long as they have access to the  
2 roof.

3  
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5

6 1.4 Templeton LP will be responsible for the distribution and sale of natural gas to  
7 Lessees of retail outlet units. Please comment on whether is it possible for  
8 FortisBC to provide service to those retail outlet units instead.

9

10 **Response:**

11 This response provides responses to BCUC IR 1.1.4, 1.1.5, and 1.1.6.

12 FEI confirms that it is possible to provide service to the retail outlets. As noted in the response  
13 to BCUC IR 1.1.1, FEI already serves customers with roof top meters, and works with  
14 developers to find solutions to serve their development needs, which may include meters  
15 installed on roof top.

16 FEI also confirms that it installed, owns and maintains all equipment and facilities for the  
17 delivery of natural gas to Lessees of units in the food court.

18 FEI does not see any economic or operational efficiencies of having both Templeton LP and FEI  
19 as gas distributors operating at the outlet centre.

20 FEI provided consent to Templeton LP to resell gas based on a specific circumstance of YVR,  
21 that is, the prior precedent of YVR having an existing consent to re-sell gas. Without this  
22 historical precedent, FEI would not have likely provided consent to resell gas as FEI does not  
23 believe it is in the best interest of customers. It is more efficient from an operational and  
24 economic perspective for Lessees of the retail outlet and the food court to be served by FEI. As  
25 noted in the response to BCUC IR 1.1.2, FEI has established processes and standards to serve  
26 customers (including those with rooftop meters). In addition, FEI has existing customer care  
27 centres, energy efficiency programs, customer choice programs and renewable natural gas  
28 options available to all customers. Further, these customers would fall under the existing FEI  
29 tariff and will have a service that is subject to the full oversight of the Commission's regulation.

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1           1.5     Please confirm, otherwise explain, that all equipment and facilities for delivery of  
2                    natural gas to Lessees of units in the Outlet Centre’s food court are owned,  
3                    installed, and maintained by FortisBC.

4  
5     **Response:**

6     Please refer to the response to BCUC IR 1.1.4.

7  
8

9  
10           1.6     Please comment on the operational and economic efficiency of having both  
11                    Templeton LP and FortisBC as gas distributors operating at the Outlet Centre.

12  
13     **Response:**

14     Please refer to the response to BCUC IR 1.1.4.