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August 14, 2017

British Columbia Utilities Commission
Suite 410, 900 Howe Street
Vancouver, BC
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Attention: Mr. Patrick Wruck, Commission Secretary and Manager, Regulatory Support

Dear Mr. Wruck:

Re: Creative Energy Vancouver Platforms Inc. (Creative Energy) 2017 Long-Term Resource Plan (the Application) – Project No. 1598921
FortisBC Energy Inc. (FEI) Comments on Process

On June 9, 2017, Creative Energy submitted its Long-Term Resource Plan (LTRP) in accordance with the British Columbia Utilities Commission's (the Commission) directions in Orders G-98-15¹ and C-12-15². On August 1, 2017, the Commission invited the parties that intervened in those proceedings to comment on the regulatory process for the consideration of Creative Energy's LTRP.

FEI fully participated as an intervener in the proceeding to consider Creative Energy's CPCN for the NEFC Neighbourhood Energy System and hereby submits this letter of registration to participate as an intervener in the regulatory process convened to consider Creative Energy's LTRP.

FEI'S Submission on Process

Creative Energy has requested that if the Commission is to convene any regulatory process for the consideration of its LTRP, that it be limited to a Streamlined Review Process (SRP) and that *"[t]he review of this LTRP should be about whether Creative Energy has selected*

¹ Creative Energy's 2015-2017 Revenue Requirements Application (RRA)

² Creative Energy's Application for a Certificate of Public Convenience and Necessity (CPCN) for its Northeast False Creek (NEFC) Neighbourhood Energy System

*the most cost-effective resource to pursue in order to reduce GHG emissions over the next 30 years”.*³

In FEI’s view, a more fulsome regulatory process is required for the adequate review of the LTRP for the following reasons:

- The review of the LTRP should be broader than an assessment of whether Creative Energy has selected the correct resource; it must be sufficient to allow the Commission to conclude whether carrying out the LTRP as a whole is in the public interest, or not.⁴ FEI acknowledges that the Commission has determined that the LTRP need not provide an in-depth discussion of demand-side measures⁵, however FEI does not believe that the scope of the review should be further narrowed.
- Some issues raised in the LTRP overlap with those canvassed in the RRA and CPCN proceedings, including the suggestion that enabling policies advanced by the City of Vancouver continue to be contemplated to secure future load.⁶ This issue was addressed in the CPCN and Neighbourhood Energy Agreement proceedings⁷ and FEI therefore considers it to be likely that the consideration of some issues raised in the LTRP may require careful examination;
- The LTRP is complex and raises novel technical and policy issues related to Creative Energy’s transition from a steam utility with historically unchanged operations to one with large-scale expansion plans, including significant forecast capital expenditures. Some of these issues are without operational or regulatory precedent.⁸

The Commission’s “Streamlined Review Process Policy, Guidelines and Procedures” (SRP Guidelines) contemplate a SRP for “smaller applications with a limited number of issues” that can be disposed of within a half day to one day proceeding.”⁹ Given the novelty and complexity of some of these issues, FEI does not expect it to be practical to conclude the consideration of the LTRP in a one day SRP. FEI also notes that the SRP Guidelines indicate that “particularly contentious” applications and applications that “pose policy issues about which there is no established Commission precedent” may not be suitable for a SRP proceeding.¹⁰

For these reasons, FEI submits that a regulatory process is necessary that provides interveners the opportunity to test the evidence filed by Creative Energy through two rounds of information requests, furnish their own evidence, if required, and make legal argument on the question of whether carrying out Creative Energy’s LTRP is in the public interest.

³ Exhibit B-1, LTRP, at para 13.

⁴ *Utilities Commission Act*, RSBC 1996, c 473, s. 44.1(6)

⁵ RRA Decision, page 15.

⁶ Exhibit B-1, LTRP Appendix A, at pages 13, 146.

⁷ Order C-12-15, pages 42-49; Order G-88-16, pages 6-12; and Order G-151-16, pages 5-13 and 16-23

⁸ For example, see Exhibit B-1, LTRP at paras 13, 20 and 65 where Creative Energy highlights that “there is no precedent for LTRPs filed with the Commission) for the service being provided

⁹ SRP Guidelines, at pages 4, 5

¹⁰ SRP Guidelines, at page 5.

If further information is required, please contact Jason Wolfe, Director, Energy Solutions at (604) 592-7516.

Sincerely,

FORTISBC ENERGY INC.

Original signed:

Diane Roy