

September 17, 2018

VIA E-FILING

Patrick Wruck
Commission Secretary
BC Utilities Commission
6th Floor 900 Howe Street
Vancouver, BC V6Z 2N3



Reply to: Leigha Worth
lworth@bcpiac.com
Ph: 604-687-3034
Our File: 7664

Dear Mr. Wruck:

Re: FortisBC Inc. 2017 Cost of Service Analysis and Rate Design Application ~ Project No.1598939

Please be advised that we make the following submission on process as counsel for the groups known collectively in this process as BCOAPO et al. in response to the Commission's September 10, 2018 letter. Exhibit A-17 asked interveners to specifically address the following items in their submissions:

- The need for an oral hearing and / or oral arguments. Parties are asked to state their preference for oral intervener final argument or, in the case of FBC, oral reply arguments instead of written final and reply arguments;
- Parties that specify the need for an oral hearing are requested to provide the reasons why this is necessary; and
- Any location preference for either an oral hearing or oral arguments should either or both take place, in Vancouver, B.C. or Kelowna, B.C

BCOAPO is cognizant of some parties' wishes for an oral hearing but this ratepayer group does not request a full oral hearing for its own purposes. Instead, BCOAPO submits that it does not appear that an oral hearing is required for the Cost of Service and Rebalancing; Other Rate Schedules, and General Terms & Conditions sections of the Application. No evidence was filed by interveners on these issues and while we might seek clarification on some small points, they are not critical to any position we might take in our Final Argument.

However, BCOAPO does see the need for an Oral Hearing for the Residential Rates and Optional TOU rate issues. There is conflicting evidence on the record and the positions parties to this process have taken are widely divergent. Also, with respect to the RCR, the recent release of the BCUC's decision on FBC's LTERP rates answered questions about the appropriate LRMC to be used, changing the landscape enough that further discovery via an oral hearing would be helpful. BCOAPO did attempt to, wherever possible, seek discovery on these issues via IR's but FBC's responses in some cases did not fully or directly address the issues we raised and in others, further clarification is necessary. One more issue we see would benefit from an oral hearing are the issues arising from FBC's proposals regarding its Commercial and Transmission Rates. We do, however, recognize that these are areas not directly relevant to our clients' interests so we are content to defer to the judgement of those who are directly affected on this issue.

BCOAPO does not support a suggestion that we engage in oral argument for a rate design. Quite often, rate design issues are detailed and numerical in nature and as a result, they do not lend themselves well to oral argument. We instead support a written argument.

Finally, due to the regional nature of FBC's service, we would support any request that this hearing take place in Kelowna. It is important to respect the ability of the Utility's stakeholders to attend a hearing. However, if there are no parties seeking to have the hearing in Kelowna, counsel submits that holding the hearing in Vancouver would keep regulatory costs lower.

If you have any questions regarding the above, please do not hesitate to contact the undersigned.

Yours truly,
BC Public Interest Advocacy Centre

Original on file signed by

Leigha Worth
Barrister & Solicitor
Executive Director