

March 16, 2020

**VIA E-FILING**

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



Reply to: Leigha Worth  
ED@bcpiac.org  
Ph: 604-687-3034  
Our File: 7400.910

Dear Mr. Wruck,

**Re: AltaGas Canada Inc. (ACI) and PSPIB Cycle Investments Inc. (PSPIB) Application for Approval to Acquire a Reviewable Interest in Each of Pacific Northern Gas Ltd. (“PNG”) and Pacific Northern Gas (N.E.) Ltd. (“PNG(N.E.)”) BCOAPO Final Argument**

We represent the BC Old Age Pensioners’ Organization, Active Support Against Poverty, Council of Senior Citizens’ Organizations of BC, Disability Alliance BC, and Tenant Resource and Advisory Centre, known collectively in PNG regulatory processes as “BCOAPO et al.” (“BCOAPO”). The constituent groups of BCOAPO et al. represent a diverse cross-section of residential energy utility ratepayers within BC who hold progressivist views, their interventions take into consideration the impacts of proposed rates, rate structures, and projects on the most economically vulnerable amongst them: the low and fixed income residents of BC. This intervention is rooted in their roles as PNG and PNG (N.E.)’s residential ratepayers who may be impacted by a decision regarding the acquisition of a reviewable interest in PNG and PNG (N.E.). We provide the following final argument regarding the above-noted application on behalf of our client groups.

AltaGas Canada Inc. (“ACI”) and PSPIB Cycle Investments Inc. (“PSPIB”) (the “Applicants”) jointly submitted the Application requesting Commission approval for PSPIB to acquire a reviewable interest in each of PNG and PNG(N.E.) (the “Application”). Both PNG and PNG(N.E.) are regulated public utilities and Section 54(7) of the *Utilities Commission Act* (“Act”) prohibits a person from acquiring a reviewable interest in a public utility unless the person has obtained the Commission’s approval.

The Application<sup>1</sup> and the Applicants' joint final argument<sup>2</sup> cite criteria for conducting reviews under section 54 of the *Act*, which were set out in Order No. G-49-07 Reasons for Decision, and which include:

- (a) the utility's current and future ability to raise equity and debt financing should not be reduced or impaired;
- (b) there should be no violation of existing covenants that will be detrimental to utility customers;
- (c) the conduct of the utility's business, including the level of service, either now or in the future, will be maintained or enhanced;
- (d) the application is in compliance with appropriate enactments and/or regulations;
- (e) the structural integrity of the utility assets will be maintained in such a manner as to not impair utility service; and
- (f) the public interest will be preserved.

BCOAPO agrees that these are the correct criteria applicable for the review of this Application.

BCOAPO has reviewed the Application, the responses to the Information Requests made by the Commission and BCOAPO, and the Applicants' joint final argument. We would like to thank the Applicants for their responsiveness to inquiries put to them and, after careful consideration of the full record, we submit that all BCOAPO's concerns have been adequately addressed. In our view, there is nothing on the record indicating that this transaction will be detrimental to PNG's residential ratepayers or indeed, any of its ratepayers so BCOAPO has no objection to this transaction.

All of which is respectfully submitted.

Sincerely,  
**BC PUBLIC INTEREST ADVOCACY CENTRE**

*Original on file signed by:*

Leigha Worth  
Executive Director | General Counsel

*Original on file signed by:*

Irina Mis  
Barrister & Solicitor

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<sup>1</sup> Exhibit B-1, page 9

<sup>2</sup> At page 2