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October 20, 2020

VIA ELECTRONIC MAIL

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Dear Sirs/Mesdames:

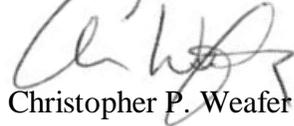
**Re: FortisBC Energy Inc. System Extension Fund (SEF) Pilot Program Compliance
Filing and Application for Approval of the SEF on a Permanent Basis
Project No. 1599112**

We are counsel to the Commercial Energy Consumers Association of British Columbia (the "CEC"). Attached please find the CEC's Final Submissions with respect to the above-noted matter.

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

Yours truly,

OWEN BIRD LAW CORPORATION



Christopher P. Weafer

CPW/jj
cc: CEC
cc: FortisBC Energy Inc.
cc: Registered Interveners

**COMMERCIAL ENERGY CONSUMERS
ASSOCIATION OF BRITISH COLUMBIA**

FINAL SUBMISSIONS

**FortisBC Energy Inc. System Extension Fund (SEF) Pilot Program Compliance Filing and
Application for Approval of the SEF on a Permanent Basis
Project No. 1599112**

October 20, 2020

Commercial Energy Consumers Association of British Columbia

**FortisBC Energy Inc. System Extension Fund (SEF) Pilot Program Compliance Filing and
Application for Approval of the SEF on a Permanent Basis
Project No. 1599112**

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**COMMERCIAL ENERGY CONSUMERS ASSOCIATION
OF BRITISH COLUMBIA**

FINAL SUBMISSIONS

**FortisBC Energy Inc. System Extension Fund (SEF) Pilot Program Compliance Filing and
Application for Approval of the SEF on a Permanent Basis
Project No. 1599112**

The Commercial Energy Consumers Association of BC (the “**CEC**”) represents the interests of ratepayers consuming energy in applications before the British Columbia Utilities Commission (“**BCUC**” or “**Commission**”).

FortisBC Energy Inc. (“**FEI**” or the “**Utility**”) applies to the Commission for approval of certain changes to its System Extension Fund (“**SEF**” or “**Fund**”) and to have the revised plan approved on a permanent basis (the “**Application**”).

The CEC participated in the original proceeding which resulted in an approval for the SEF as a Pilot Project among other particulars, and has participated in this proceeding.

The CEC provides the following submissions for the Commission’s review and consideration.

I. SUMMARY POSITION

1. The CEC supports the SEF and notes that, to the extent that the \$1 million is expended in any year, non-participating ratepayers will experience minimal cost implications with regard to the formula by which it is dispensed. The more throughput and revenues that are brought on will limit the cost impacts, and the CEC recommends that this be pursued to the extent possible.
2. Accordingly, the CEC would not object to the Commission approving the 95% funding as proposed by FEI.
3. The CEC considers that it could be preferable for FEI to move towards a lower % such as 80% or 85% for the next 2 years to avoid putting pressure on the \$1 million cap unnecessarily, and enabling a future increase to 95% if needed. The CEC would support the extension of the Pilot under this scenario.

II. SUBMISSIONS

A. BACKGROUND

4. FEI uses its Main Extension Test (“**MX Test**”) to determine whether or not a customer must pay a Contribution in Aid of Construction (“**CIAC**”) in order for a main extension to proceed, and if so, what amount the CIAC should be.¹
5. The SEF was established by BCUC Order G-147-16 approximately 4 years ago,² and provides financial assistance to eligible homeowners who require a lengthy main extension to connect to the FEI natural gas distribution system.
6. The Fund of \$1 million is available annually to partially offset potentially significant CIACs that the customer might otherwise be required to pay.³
7. The Fund, as it currently exists, will offset 50% of the cost of a customer’s CIAC up to a maximum of \$10,000.⁴ In addition to making the Fund permanent, FEI proposes that the Fund increase its contribution to cover 95% of a customer’s CIAC up to a maximum of \$10,000.
8. FEI identifies two key aspects of the program which it believes can be improved.
9. These include:
 - a) the number of customers who declined to proceed with their connection due to cost; and,
 - b) not all of the available funding was used because customers declined.⁵
10. The CEC submits that the key issue for review should be balancing the program objectives and benefits with the other principles of rate design.
11. While the \$1 million Fund is an end to achieving those goals, spending the \$1 million should not be considered a goal to be achieved in and of itself.

¹ Exhibit B-6, CEC 1.3.1

² Exhibit B-1, Cover Letter

³ Exhibit B-1, page 1

⁴ Exhibit B-6, CEC 1.3.2

⁵ Exhibit B-1, page 5

B. PROGRAM OBJECTIVES

12. In BCUC 1.1, FEI states that:

“A key goal of the SEF is to promote equity as between new customers in the more developed portions of the Company’s service area and customers that are located in areas further from existing mains. The SEF pilot program funding promotes the equitable treatment of potential new customers that are located further from existing mains throughout FEI’s service territory by reducing a required customer contribution to connect to the natural gas system. Promoting equitable treatment in this way improves access to natural gas as an energy option for people throughout the province.

This goal is derived from the Guiding Principles described in FEI’s 2015 System Extension Application, which were developed in consultation with stakeholders from varied backgrounds including experienced intervener groups, a number of First Nations, regional district and municipal representatives, and two provincial government ministries. BCUC staff attended the consultation sessions as observers. The SEF program supports two of the Guiding Principles, namely:

1. Provide Energy Choice; and
2. Support Government Objectives.

The first Guiding Principle, Provide Energy Choice, is to enable new customers to easily access natural gas should they choose to do so. Participants in the Stakeholder consultations expressed that the upfront cost of installing natural gas infrastructure, including any potential CIAC related to system extensions, presented a major barrier in access to natural gas service for new customers. The SEF seeks to reduce the value of the CIAC payable by homeowners facing a high cost to connect to the gas system, thereby reducing this significant barrier to energy choice for these potential customers.

The second Guiding Principle, Support Government Objectives, sought to provide the public the potential benefits of access to low cost energy, local economic development, the creation and retention of jobs and tax revenues, as well as assist in meeting greenhouse gas (GHG) emissions targets and related energy objectives of the *Clean Energy Act* (CEA)³. In expanding the access to natural gas service the SEF primarily assists in providing the public with the benefits of low cost energy which helps maintain housing affordability and fosters economic development.”⁶

13. The CEC notes that there are benefits to FEI’s remaining natural gas customers when more customers connect to the system.

14. In CEC 1.1.1, FEI points out that new customers on the system results in better utilization of the system, and may contribute to lower overall system costs to customers. However, it is too early in the system life to realize the full benefits of load growth.⁷

⁶ Exhibit B-3, BCUC 1.1.1

⁷ Exhibit B-6, CEC 1.1.1

15. In BCSEA Amended IR 1.2.3, FEI provides the following Rate Impact Analysis which shows an average cost of \$0.08 per customer per year for the SEF program.

	RIA Results for 2017-2019 Growth Related to Customers Under SEF Program
Average Cost per GJ with Growth	\$4.1682
Average Cost per GJ without Growth	\$4.1678
Rate Impact per GJ	\$0.0004
Percentage of Rate Impact	0.01%
Average Cost per Customer	8 cents per customer per year

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16. FEI states that:

“...the analysis includes all the costs but only approximately 1.5 years of revenues, which will continue to accrue over the life of the main. It also does not include potential future customer additions to the SEF main extensions during the 5-10 year MX addition window, which could result in further savings to existing customers. It is reasonable to expect that mains that continue to generate revenues will, over the lengthy service life of the mains, be modest net contributors of benefits to customers as a whole”.⁹

17. The CEC submits that the ability to generate benefits for all ratepayers from the SEF is important and could reasonably be included as one of the program objectives.
18. The CEC would be interested to understand if there were viable options for FEI to review system extension applications and determine whether or not it was likely for more customers to follow, and account for this in the disposition of the SEF. If FEI were able to prioritize customers based on future demand, it could be beneficial to ratepayers overall in encouraging greater throughput.
19. In its Final Argument FEI states that reducing the disparity within FEI’s service area is a valid rate design objective.¹⁰
20. They go on to relate the mitigation of CIAC to that of postage stamping rates, and argue that the concept can apply to any rate design feature, and not just delivery rates.¹¹
21. The CEC considers that FEI has overstated the relationship to some degree. The postage stamping of delivery rates implies that once a customer, or future customer, is connected to the system they will pay the same rates for the services provided.

⁸ Exhibit B-5-1 BCSEA 1.2.3

⁹ Exhibit B-5-5 BCSEA 1.2.3

¹⁰ FEI Final Argument page 5

¹¹ FEI Final Argument page 5

22. Assessing the cost of connection for individual customers and determining the appropriateness of that connection however must be undertaken at some point in order to preserve the overall cost-effectiveness of the system.
23. In the CEC's view, the principle of cost causation is also a significant one and should not be overlooked in favour of reducing disparity particularly within a singular rate class without good reason.
24. The CEC is in favour of the SEF program but cautions that it should be managed to maximize benefits to other ratepayers to the extent possible.
25. Additionally, the CEC submits that the program should not be increased beyond the \$1 million without due consideration of balancing the principles of cost causation with that of extending service.
26. The CEC submits that it could be preferable to offer similar benefits to other rate classes than to overreach in absorbing customer CIAC across a single rate class, in this case residential.
27. The CEC submits that FEI should develop a Pilot Program to offer CIAC reductions to prospective commercial customers.
28. The CEC notes that commercial customers have higher Revenue:Cost ratios than the residential rate, and further that individual commercial rate class customers could likely be expected to contribute more revenues than individual residential customers, resulting in greater benefits to non-participating ratepayers.
29. In that FEI expects there to be small benefits to other customers from the residential SEF program, the CEC expects that such benefits would be increased from a program for commercial ratepayers due to their higher usage and R:C ratios.
30. In BCUC 1.3.4, FEI states that while it has not received any formal written complaints, customers have verbally complained about the remaining CIAC cost to customers even if receiving funds from the SEF. Additionally, customers have noted a lack of fairness when considering that the first applicant might pay a significant CIAC, while others following on the same main might not have to pay CIAC at all.¹²
31. The CEC acknowledges the disparity in cost for the first customer requiring CIAC versus the benefit to those following and connecting to the same new main.
32. The CEC submits that it could be useful for FEI to consider what options may be available for managing the CIAC contributions such that the cost weight does not all fall on the first customer. For example, FEI may consider permitting customers to access additional funding through the contributory main model.¹³

¹² Exhibit B-3, BCUC 1.3.4

¹³ Exhibit B-3, BCUC 1.6.5

C. PILOT RESULTS

33. FEI provides the following Pilot Program results for the 3-year pilot:

Table 2: SEF Pilot Program Results 2017-2019

Year	Total SEF Eligible Participants	Actual SEF Participants	% Participated	SEF Funding Provided	% Funding Utilized	SEF Funding Declined	% Declined
2017	374	218	58%	\$ 265,950	27%	156	42%
2018	271	167	62%	\$ 392,716	39%	104	38%
2019	260	156	60%	\$ 318,237	32%	104	40%
Totals	905	541	60%	\$ 976,903	33%	364	40%

14,15

34. As demonstrated above, the Pilot only distributed about one-third of the available funding.
35. Approximately 40% of eligible customers declined funding, which the CEC understands was because the CIAC requirement remained too high at the 50% level.

Vancouver Area vs Other Areas

36. FEI has presented evidence that a very large majority of customers with CIAC requirements are located outside of the dense Vancouver area.
37. Over the pilot term (2017-2019), and within the Vancouver area, there were 18,700 customer additions.¹⁶ Approximately 0.6% of these residential customer additions paid a contribution to a main extension over the 3-year period.¹⁷ This amounted to 119 customers.¹⁸ 100 of the 119 customers came from a single extension to serve a strata complex,¹⁹ which could theoretically mean that there was a total of 20 customers of the 18,700 that required a main extension, amounting to 0.1%.²⁰
38. In contrast, there was a total of about 34,400 customer additions outside of the Vancouver area over the same period.²¹

¹⁴ Exhibit B-1, page 5

¹⁵ The CEC notes that deducting 119 Vancouver area customers from the 905 total Eligible Participants would result in 786 non-Vancouver area customers, which is again different from the other figures noted above. The CEC has not been able to rationalize the difference.

¹⁶ Exhibit B-1, page

¹⁷ Exhibit B-1, pages 3 and 4

¹⁸ Exhibit B-1, pages 3 and 4

¹⁹ Exhibit B-6, CEC 1.2.2

²⁰ Exhibit B-6, CEC 1.2.2

²¹ Exhibit B-6, CEC 1.2.2

- 39. In CEC 1.2.2, FEI states that there were 319 customers outside the Vancouver area who paid for a main extension, and 363 homeowners who declined to proceed with the main extension for a total of 682 customers or approximately 2%.²²
- 40. In its Application FEI states that there were 794 qualified homeowners outside of the Vancouver area with CIAC requirements over the three-year period,²³ including all those who did and all those who did not accept funding.²⁴

Table 1: Average CIACs outside the Vancouver Area

Year	# of Qualified Homeowners	Average CIAC
2017	270	\$ 7,540.00
2018	267	\$ 6,690.00
2019	257	\$ 5,870.00
Overall	794	\$ 6,710.00

25

- 41. The CEC notes that this represents about 88% of the total 905 Eligible participants identified in Table 2 above. The CEC has not been able to rationalize the difference of 112 customers; the 794 presented in Table 1 versus the 682 discussed in the CEC IR noted earlier in these submissions.
- 42. Nevertheless, the CEC accepts that a significantly greater proportion of customers in the area outside of Vancouver are required to pay CIAC than there is within the Vancouver area, and that there is a greater financial barrier to using natural gas outside of Vancouver than there is within the Vancouver area,²⁶ at least using CIAC as the financial metric.
- 43. The CEC notes that there are certain policies within the City of Vancouver which might also contribute to financial barriers for using natural gas. These policies would potentially be beyond the Utility's ability to address on an individual case basis.

Vancouver Island Customers

- 44. For those customers who accepted funding, approximately 35% were from Vancouver Island.

²² Exhibit B-6, CEC 1.2.2

²³ Exhibit B-1, page 4

²⁴ Exhibit B-6, CEC 1.2.1

²⁵ Exhibit B-1, page 4

²⁶ Exhibit B-1, page 4

Years	Lower Mainland, Whistler, and Sunshine Coast	Interior	Vancouver Island	Grand Total
2017	114	56	47	217
2018	28	84	55	167
2019	11	61	88	160
Grand Total	153	201	190	544

45. However, when all homeowners in FEI’s dataset are considered, including all those who participated in SEF as well as those who declined the SEF offer, approximately 60% are from Vancouver Island.²⁷
46. That is, Vancouver Island residents appear to have been accepting the SEF offer in lower proportions than might otherwise be indicated.

Conversion from Higher Carbon

47. FEI provides the following table of those customers who were considered ‘conversion’ from higher carbon fuels to natural gas over the course of the SEF pilot program.

Year	Number of Customers Switched from Higher Carbon Fuels to Natural Gas	Total Number of SEF Participants	% of Customers Switched from Higher Carbon Fuel to Natural Gas
2017	24	217	11%
2018	40	167	24%
2019	48	160	30%
Grand Total	112	544	21%

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48. When accounting for an outlier, FEI states that the total percentage who switched is in the order of 25%.²⁹
49. Further, as noted by FEI, these customers will have access to FEI’s conservation and efficiency programs, and will ultimately see GHG emissions reduce further as FEI proceeds with its renewable natural gas sourcing.³⁰

²⁷ Exhibit B-5, BCSEA 1.6.2

²⁸ Exhibit B-3, BCUC 1.2.1

²⁹ Exhibit B-3, BCUC 1.2.1

³⁰ Exhibit B-3, BCUC 1.2.1.1

50. The CEC finds this to be a significant program benefit.

D. PROPOSED CHANGES

51. FEI is proposing to make the SEF Pilot a permanent program.

52. The permanent program would differ from the pilot only with respect to the level of contribution as indicated in Table 4 of the Final Argument.³¹

53. FEI proposes to increase the level of contribution from 50% of a CIAC to 95% of a CIAC, up to a maximum of \$10,000.

Table 4: Summary of SEF Pilot Program Rules and Proposed Amendment

Current Program	Proposed Amendment
Eligibility	
Applicant must be a homeowner	No change
Must be single family home or townhome	No change
Home must be a principal residence	No change
PI must be between 0.2 and 0.8	No change
Cannot participate in Contributory Main model	No change
Total Funding Amount	
Capped at \$1 Million per year	No change
Funding Rules	
SEF pays: 50% of CIAC to a maximum of \$10,000 per customer	SEF pays: 95% of CIAC to a maximum of \$10,000 per customer

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54. The CEC notes that with \$1 million in annual funding, the funding would be available to serve a minimum of 100 customers at \$10,000 each.

55. Assuming the Fund provided 95% of the required CIAC, or \$6375 per request³³, the Fund could serve about 157 customers.

56. Table 3 in the Application illustrates the differences between the Vancouver area, and the area beyond Vancouver under the 95% funding proposal.

³¹ FEI Final Argument page 13

³² FEI Final Argument page 13

³³ Exhibit B-1, page 7

Table 3: Comparison of CIACs in Vancouver Area vs. Outside Vancouver Area with the SEF Portion Amended as Proposed to up to a maximum of 95%

Participant location	Required CIAC	SEF Portion	Homeowner Portion
Vancouver Area	Approx. \$ 0	\$ 0	\$ 0
Non Vancouver Area	\$ 6,710	\$ 6,375	\$ 336

34

57. The CEC notes that virtually all the funding would be provided outside of the Vancouver area, and it could be reasonably expected that a significant portion would occur in Vancouver Island.
58. The CEC points out that Vancouver Island customers were recently included in postage stamp rates, which resulted in those customers benefitting from lower rates which are ultimately subsidized to a small extent by customers in the Lower Mainland.

Alternatives

59. In BCUC 1.7.2 the Commission inquired about the rationale for the increase to 95% subsidy.
60. FEI stated that it considered various alternatives, including increasing the per customer maximum funding amount above \$10,000; changing the Profitability Index (PI) threshold to enable more customers; different percentage subsidies; reducing the CIAC to a target amount; and various combinations of the above.³⁵
61. The CEC has reviewed the FEI's evidence with regard to these options and will only comment on the change in the % subsidy, which the CEC deems to have been reasonably successful and one of the fairer methodologies.
62. With regard to changing the % subsidy FEI responded that:

“Regarding the different percentage options, any increase in the percentage of the CIAC payable by the SEF versus the current 50 percent provision under the pilot program will naturally improve the performance of the program. However, if the SEF were to pay a smaller portion than the proposed 95 percent, the SEF program would be less effective at contributing to greater equity among eligible homeowners who request access to natural gas. At a lower percentage, fewer interested homeowners would proceed with their main extension project.

FEI also considered SEF funding of 100 percent funding of the participant's CIAC, as had been proposed in a filing FEI submitted in 2018. However, with the benefit of

³⁴ Exhibit B-1, page 7

³⁵ Exhibit B-3, BCUC 1.7.2

additional years of participation data, FEI believes at this funding level the annual \$1 million available SEF funding would be exceeded prior to the end of each year.”³⁶

63. The CEC does not find the above response to be particularly satisfactory, and submits that FEI appears to be searching for an appropriate funding level without benefit of significant analysis supported by customer evidence as to what would and would not be acceptable in facilitating connection.
64. In CEC 1.6.2 the CEC inquired as to the expectations if the funding was set to 70%.
65. FEI states that, using established forecast assumptions:

“FEI expects that approximately 35% fewer homeowner would accept the SEF assistance leaving 40 to 50 percent of the program’s annual \$1 million amount still available. While in theory one could reduce the SEF amount available to \$500-\$600 thousand to reflect a level of disbursements, FEI explains in response to CEC IR1 7.4 why this would not be consistent with the objectives of the program. Moreover, as discussed in the response to BCUC IR1 7.5, the regulatory treatment that FEI intends to use will involve a true-up so that even if the annual SEF funds granted are less than the \$1 million available, customers are kept whole. Therefore, FEI concluded that 95 percent SEF funding towards a customer’s CIAC, as proposed, is the appropriate amount which supports the program objectives. It is also most likely to use the \$1 million available amount annually without the funds being depleted early in a year.”³⁷
66. The CEC supports spending the \$1 million in the SEF programs, which has been approved by the Commission as an acceptable cost, but finds the analysis of the best % to be less than well supported.
67. FEI also states:

“Through this review exercise and by way of feedback from potential SEF participants, FEI concluded that the proposed 95 per cent funding level will be the most effective means to achieve the objectives of the program while also maximizing use of the \$1 million available SEF funding each year.”³⁸
68. Overall, the CEC submits that FEI has not made a strong case for jumping the subsidy to 95%, when a potentially lower % amount may achieve the same objectives.
69. The CEC is concerned that the increase to 95% could potentially unnecessarily lead to requests that exceed the \$1 million cap, and increased pressure to increase the spending cap for the residential SEF program. The CEC would not support such an increase in the absence of an equivalent program for commercial customers.

³⁶ Exhibit B-3, BCUC 1.7.2

³⁷ Exhibit B-6, CEC 1.6.2

³⁸ Exhibit B-3, BCUC 1.7.2

- 70. The CEC submits that it could be reasonable for the Commission to extend the Pilot for another 2 years with a more moderate increase in the % allowance, such as 80% or 85% of such a subsidy. This would permit FEI to monitor the extent of the contribution made to non-participant ratepayers relative to the overall cost.
- 71. The costs and benefits could then be weighed, and an increase to 95% could be provided later if this was found to be necessary. The CEC expects that if FEI increased its funding to 80% - 85% for a period of time it might generate a better understanding of the threshold levels of customer participation.
- 72. The CEC submits it could be appropriate for FEI to allow customers accessing the SEF to permit the mains declared as contributory mains where appropriate, such that the CIAC cost would be spread across more connecting customers, thereby addressing free ridership while limiting the subsidies provided by non-participating ratepayers.

E. DISTRIBUTION

- 73. In BCUC 1.5.1, FEI provides a table demonstrating that, even if customers had not declined, the total SEF funding would have been in the order of \$2.5 million over the three years, which is below the \$3 million that is available.

Year	SEF Funding Amounts Actually Disbursed	SEF Funding Amounts Declined	Total if all Homeowners had accepted
2017	265,950	694,636	960,586
2018	392,716	464,768	857,483
2019	321,537	425,418	746,955
Totals	980,203	1,584,822	2,565,024

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- 74. In BCUC 1.7.5 FEI forecasts that under the proposed funding rules the SEF program will likely use all of the \$1 million in available funding each year.
- 75. FEI proposes to use a ‘First Come First Served’ approach to access the available annual funding of \$1 million. In the event that the SEF funding requests reach the maximum, FEI will close the program to new participants until January 1 of the following year.⁴⁰
- 76. This proposal appears to be different from the methodology described in BCUC IR 18.3 in the 2015 System Extension proceeding, which was intended to realize the most benefits for all customers from new customers attaching.⁴¹

³⁹ Exhibit B-3, BCUC 1.5.1

⁴⁰ Exhibit B-3, BCUC 1.4.1

77. FEI states that its approach will be more practical than trying to prioritize customers that will add more load. Homeowners make requests throughout the year which may be in conjunction with building or renovation costs, and require timely information as to their costs. Deferring decisions for customers in the earlier part of the year until it could be determined if the funding cap would be exceeded could risk losing the customer to alternative options.⁴²
78. The CEC recognizes that adopting a first come first served methodology may be the easiest means of distributing the funding, but submits it is not necessarily the fairest to the customers who request SEF funding later in the year, and may not be the most effective from a cost/benefit perspective.
79. In the CEC's opinion, there is not significant value in developing a program where the demand could well exceed the value of funding available, necessitating prioritization either in a first come first served methodology or otherwise. Even to the extent that customers are rolled over into the following January, if there is consistently more demand than the \$1 million available, it will ultimately develop into a backlog.
80. The CEC submits that it may be preferable for FEI to offer an 80% to 85% funding level, which could potentially keep the requests near but within the \$1 million amount, while allowing FEI to refine its understanding of customer requirements.
81. FEI could potentially develop means to better prioritize customers for the benefit of all with further experience.

III. CONCLUSION

82. The CEC supports the SEF and notes that to the extent that the \$1 million is expended in any year, non-participating ratepayers will experience minimal cost implications with regard to the formula by which it is dispensed. The more throughput and revenues that are brought on will limit the cost impacts and the CEC recommends that this be pursued to the extent possible.
83. Accordingly, the CEC would not object to the Commission approving the 95% funding as proposed by FEI.

⁴¹ Exhibit B-3, BCUC 1.4.1

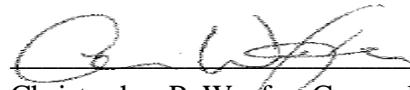
⁴² Exhibit B-3, BCUC 1.4.1

84. The CEC considers that it could be preferable for FEI to move towards a lower % such as 80% or 85% for the next 2 years to avoid putting pressure on the \$1 million cap unnecessarily, and enabling a future increase if needed. The CEC would support the extension of the Pilot under this scenario.

ALL OF WHICH IS RESPECTFULLY SUBMITTED

David Craig

David Craig, Consultant for the Commercial Energy
Consumers Association of British Columbia



Christopher P. Weaver, Counsel for the Commercial
Energy Consumers Association of British Columbia