FortisBC
2011 Residential Inclining Block Rate Application
Procedural Comments

By: Ludo Bertsch, Horizon Technologies Inc. (250) 592-1488
For: Okanagan Environmental Industry Alliance
Date: May 10, 2011
BCUC Project Number: #3698628

On behalf of the Okanagan Environmental Industry Alliance, find below our comments regarding procedural matters in response to BCUC’s Exhibit A-3.

1 The type of review process for the Application: written hearing or oral hearing:

   We support a written hearing. It is a more cost effective and time effective approach.

   An oral application may restrict our participation in the process, due to travel and extra time requirements. We suggest that the cancellation of the procedural conference is further evidence of the challenges that may be looming if an oral conference is attempted.

   We note that BC Hydro’s latest RIB Re-Pricing Application was successfully accomplished as a written hearing.

2 The location of any hearing:

   Not applicable, since we support a written application.

3 The number of rounds of Information Requests from the Commission and Interveners:

   We strongly suggest that two rounds of Information Requests should be allowed and oppose FortisBC’s assertion that one round of Information Request will be adequate.

   We have previously had issues in which we felt our IRs were not adequately answered by FortisBC, and with only one IR round, there is no recourse.

   We fail to see the significance of FortisBC note in support of a single round that: “the Application was filed at the direction of the Commission rather than at the Company’s initiative”.

Ludo Bertsch, Horizon Technologies for OEIA
4  The filing of evidence by Interveners:

At this point, we do not anticipate filing evidence, however, dependent on the outcome and answers provided by FortisBC, we may find the need to do so later on. In the BC Hydro RfB application, we filed evidence because we were not getting the type of answers we would have expected from BC Hydro.

Therefore, we suggest a stage for Interveners evidence be incorporated into the schedule, and after the second round of IRs, an invitation could be made for Interveners’ evidence. If no Intervener comes forward with evidence, that stage could be skipped and the schedule accelerated.

5  Participation Assistance Budget Submission (PACA):

The filing of the PACA budgets is scheduled for May 19, 2011, yet the first round of Information Requests is due on May 16, 2011. Therefore, one round of Information Requests will have occurred before PACA budgets are submitted, let alone, receive a response back from BCUC on whether or not the budget is acceptable.

As a not-for-profit Intervener for several years, with what we believe to be an important role in the BCUC proceedings, a key factor in determining whether or not to effectively participate in a proceeding is the ability to be funded through PACA funding.

We encourage BCUC to respond quickly to the PACA budgets, so that Interveners can gauge their continued work involvement in the RIB process.