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July 20, 2016

British Columbia Utilities Commission
6th Floor, 900 Howe Street
Vancouver, BC
V6Z 2N3

Attention: Ms. Laurel Ross, Acting Commission Secretary and Director

Dear Ms. Ross:

Re: FortisBC Inc. (FBC or the Company)
Project No. 3698875
FBC Net Metering Program (the Program) Tariff Update (the Application)
FBC Submission on Process

In accordance with the Regulatory Timetable set out in Appendix B to Order G-94-16, FBC respectfully submits the following regarding the remainder of the regulatory process for this Application.

The Application submitted by FBC on April 15, 2016 does not seek any substantive changes to the Net Metering Program at FBC, nor was it filed in response to a request by the British Columbia Utilities Commission (the Commission) for a general review of the specifics of the Program. The Application does not seek changes to the types or sizes of the net metering systems allowable under the current tariff, nor does it seek to change the amount of net excess generation that is permissible within the current program.

The Application seeks to clarify the language used to describe the Program, confirm the interpretation of the billing methodology to be used in calculating customer bills each billing period, and to implement a kWh Bank which will maximize the value of periodic unused generation for most customers.

The Company is also seeking to compensate customers for any unused excess generation that remains in the kWh Bank, if approved, at the end of an annual period at a rate equivalent to the Tranche 1 rate in British Columbia Hydro and Power Authority's Rate Schedule 3808 as a proxy for an avoided cost valuation of that energy. While this newly proposed aspect of the Program has garnered interest from interveners, the rate used for this purpose will also have a minor impact for all but a handful of customers.

Each of the proposals contained in the Application, and a number of other related topics were fully explored during a round of information requests (IRs) that entailed the Company

responding to over 270 questions. FBC believes that a further round of IRs will be of little value to the Commission in making determinations on the issues before it in this matter. FBC submits that the written hearing process, which Order G-59-16 previously contemplated, should continue, and the opportunity for the filing of Argument will provide for an appropriate and efficient final step in the review of the Application.

The Company has had the opportunity to review those submissions of interveners with respect to further process that had been filed at the time of writing.

In Exhibit C1-3, the B.C. Sustainable Energy Association and Sierra Club British Columbia (BCSEA) expresses the view that the evidentiary record is sufficient and the next step should be final written arguments, that it does not see a need for a second round of IRs, and that in its view, disagreements with aspects of FBC's responses to IRs can be expressed in final argument more efficiently than through a second round of IRs. The Company agrees with these submissions.

Similarly, in Exhibit C2-3, the British Columbia Old Age Pensioners' Organization, Active Support Against Poverty, Disability Alliance BC, Council of Senior Citizens' Organizations of BC, Together Against Poverty Society, and the Tenant Resource and Advisory Centre *et al.* (BCOAPO) states that it does not require a second round of IRs, submits that following an evidentiary stage, FBC should make final written submissions, followed by written submissions from interveners. FBC agrees with the BCOAPO that a second round of IRs is not necessary and that the process should move to written submissions. The Company notes that the filing of further evidence has not been proposed by the Commission and that no intervener, including the BCOAPO, has indicated a desire to do so.

The submission of Mr. Scarlett (Exhibit C8-3) advocates for a written process and is not supportive of an oral hearing but does request a second round of IRs. In support of this request Mr. Scarlett indicates that he requires information about green power certification and the uptake and financial impact of the Green Power Rate Rider. The Green Power Rate Rider is not the subject of this Application and neither the uptake (which is nil), nor the financial impact (also nil) are germane to the current process. Mr. Scarlett's second example regarding Net Metering customer contact exemplifies an instance described by the BCSEA as, "*disagreements with aspects of FBC's responses to information requests (IRs) can be expressed in final argument more efficiently than through a second round of IRs.*"

With regard to the submission of Mr. Shadrack (Exhibit C9-4), FBC notes that he does not favour an oral hearing except as to determine the scope of subject matter of the completed IRs, and would participate in a second round of IRs should the Commission find that the Company's first round responses were inadequate, but has not indicated that a second round is needed to delve further into relevant information. The Company believes that it has provided full responses to all relevant IRs with the information that is available to it. Mr. Shadrack primarily has concerns with responses provided to the questions of other parties, and FBC has heard no concerns from those parties regarding the adequacy of its responses.

The Company is appreciative of the perspective that Mr. Shadrack brings to the discussion of alternative energy matters, however, discussions of the broader issues of resource planning and climate change, for example, will not, in the opinion of FBC assist the Commission in making determinations on the limited matters before it in this Application. These discussions

do not belong in this process. FBC is not seeking a determination on whether or not it should have a Net Metering Program, it is seeking amendments to the existing program aimed at making the program clearer and more equitable for all customers that will, for most provide a small benefit.

With respect to the comments contained in the Resolution submission (Exhibit C3-3) regarding the FBC information request responses, the Company reiterates that it has provided complete responses to the best of its ability and its understanding of the questions as posed. Final submissions on matters that are on the record via the Application and IR responses provide a venue for interveners to draw attention to particular concerns and the Company will provide further comment in its reply.

Given the preceding, FBC submits that there is general support for a written process, and that a further round of IRs to elicit more evidence is not necessary. FBC believes the following schedule would be appropriate, and that once completed, will provide an evidentiary record adequate for a Decision to be made.

The Company notes that, as previously indicated, there is a lack of urgency for the remainder of the process, and has suggested dates sufficiently far into the future to provide plenty of time to review the entirety of the record to date.

Proposed Regulatory Timetable

ACTION	DATE (2016)
FBC Final Submission	September 16
Intervener Final Submission	September 23
FBC Reply Submission	September 30

If further information is required, please contact Corey Sinclair, Manager, Regulatory Services at 250-469-8038.

Sincerely,

FORTISBC INC.

Original signed:

Diane Roy

cc (email only): Registered Parties