

William J. Andrews

Barrister & Solicitor

1958 Parkside Lane, North Vancouver, BC, Canada, V7G 1X5
Phone: 604-924-0921, Fax: 604-924-0918, Email: wjandrews@shaw.ca

October 13, 2016

British Columbia Utilities Commission
Sixth Floor, 900 Howe Street, Box 250
Vancouver, BC, V6Z 2N3
Attn: Laurel Ross, Acting Commission Secretary and Director
By email: commission.secretary@bcuc.com

Dear Madam:

Re: FortisBC Energy Inc. All-Inclusive Code of Conduct and Transfer Pricing Policy
Application ~ Project No.3698873
BC Sustainable Energy Association and Sierra Club BC,
Application to intervene/Late application to intervene

I am writing on behalf of BCSEA-SCBC to apply to intervene, or in the alternative, to make a late application to intervene. BCSEA-SCBC's intervention request form is attached.

The Commission's September 20, 2016 letter [Exhibit A-3] provides a Proposed Regulatory Timetable, which calls for intervener applications by September 28, intervener comments on the hearing process by October 5 and FEI's reply by October 11, 2016. There is no hearing order yet.

BCSEA-SCBC have reviewed submissions on scope and procedure by Commercial Energy Consumers [Exhibit C1-2], MoveUp [Exhibit C2-2], and BCOAPO [Exhibit C3-2], and FEI's reply submissions on scope procedure [Exhibit B-3]. BCSEA-SCBC accept the record as it stands.

I submit that no party would be prejudiced by acceptance of this intervention or late intervention.

Yours truly,

William J. Andrews



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Request to Intervene

In accordance with the Commission's Rules of Practice and Procedure, a Request to Intervene form must be received by the Commission by the deadline included in the proceeding's regulatory timetable. Please provide a completed form to the Commission Secretary at commission.secretary@bcuc.com. If email is unavailable, forms may be mailed to the Commission Secretary at the address above.

Proceeding name Date

Intervener contact information

Name

Organization

City Province

Email Phone number

Also representing (if applicable)

Representative contact information

Name

Organization

City Province

Email Phone number

Additional information

Please state your reasons for intervening in this proceeding.

BCSEA is a non-profit association of citizens, professionals and practitioners committed to promoting the understanding, development and adoption of sustainable energy, energy efficiency and energy conservation in British Columbia. BCSEA supports the province's transition to a lower-carbon economy. BCSEA has five chapters across B.C. and approximately four hundred individual and corporate members. Virtually all of BCSEA's members are ratepayers of one or more of BC's public energy utilities. BCSEA represents individuals and corporations in BC who care about energy sustainability and climate change, and who want the energy they purchase and use to be sustainably produced and transported.

SCBC is a non-profit organization of British Columbians from all walks of life. SCBC represents individuals in BC who care about a broad range of environmental issues, including climate change and clean energy, and who want the energy they purchase and use to be produced and transported in ways that minimize harm to the natural environment. SCBC has five local groups and over 12,000 members and supporters across the province. Virtually all of SCBC's members are ratepayers of one or more of BC's public energy utilities.

Please state how you are directly or sufficiently affected by the Commission's decision in this matter; or describe your experience, information, or expertise relevant to this matter that would contribute to the Commission's decision making.

Members of BCSCA and SCBC are ratepayers of FEI, FBC and FAES. BCSEA-SCBC's interests in this proceeding are as non-profit public interest environmental and energy policy organizations, and as representatives of their members' interests as ratepayers.

BCSEA-SCBC's interests in the proceeding are indicated by their participation in:

- the Commission's Inquiry into Alternative Energy Services by FortisBC Energy Utilities,
- the consultation process led by FEI regarding the development of a CoC and TPP, which process was directed by the commission in the AES Inquiry Report,
- the Commission's proceeding regarding FEI's proposed Code of Conduct and Transfer Pricing Policy for Affiliated Regulated Businesses Operating in a Non-Natural Monopoly Environment,
- FEI's stakeholder consultation regarding an All-Inclusive Code of Conduct and Transfer Pricing Policy.

Please list the key issues you intend to address in the proceeding.

The issues BCSEA-SCBC intend to pursue during the proceeding include:

- whether the proposed All-Inclusive Code of Conduct and Transfer Pricing Policy meets the requirements of Order G-31-15,
- allocation of risk between ratepayers of affiliated regulated public utilities based on cost causation,
- other issues to be determined.

For administrative purposes only

Do you intend to participate fully, including attendance at hearings and submission of evidence or information requests, if applicable?

Yes

Do you intend to request PACA funding? This does not impact your ability to participate.

Yes

Have you or your organization web-registered as an intervener or interested party in the past 12 months?

Yes

If yes, please provide your username