

September 27, 2017

**VIA E-FILING**

Patrick Wruck  
Commission Secretary  
British Columbia Utilities Commission  
Suite 410, 900 Howe Street  
Vancouver, BC V6Z 2N3



Reply to: Kate Feeney  
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Our file: 7646

Dear Mr. Wruck:

**Re: FBC 2016 Long Term Electric Resource Plan and Long Term Demand  
Management Plan – Project No.3698896  
Intervener Comments on Further Process**

FBC filed its 2016 Long Term Electric Resource Plan (LTERP) and Long Term Demand Side Management Plan (LT DSM Plan) on November 30, 2017. On August 25, 2017, FBC advised the British Columbia Utilities Commission (the Commission) that it intended to submit Errata to the LTERP and LT DSM Plan and applied to suspend the regulatory timetable. By Order G-134-17 the Commission suspended the regulatory timetable until further notice. By Order G-139-17, the Commission established a new regulatory timetable under which Interveners were to submit comments on further process by September 29, 2017. BCOAPO et al.'s comments are set out below.

On September 15, 2017, FBC filed the Errata to the LTERP and LT DSM Plan, which arose out of errors in the assumptions used in the Conservation Potential Review for FBC's service territory. The first correction in the Errata was to use a discount rate of 8% instead of 6%. The impact of this change was to reduce electricity savings over time and to increase costs (since future savings will be worth less when discounted at a higher rate). The second correction in the Errata was to include losses in the savings estimates, since DSM savings are measured on a gross basis. The impact of this change was to increase energy savings associated with the various conservation measures and reduce the cost of DSM. The net effect of the two changes is a reduction in the cost of the DSM scenarios. However, the net effect is not great and does not change FBC's conclusions as to the preferred portfolio.

The Errata contains corrections to the original application as well as corrections to a number of IR responses. In some instances, the corrections are intuitively obvious given the changes to the DSM costs. However, there are several instances where this is not

the case. For this reason, we submit that further process should include an additional round of IRs, to be limited to addressing matters raised by the Errata and the corrections made to the evidence. After the additional round of IRs, we are content to proceed to final written arguments.

Sincerely,

**BC Public Interest Advocacy Centre**

Kate Feeney  
Staff Lawyer