

**Box 484, Kaslo
British Columbia, V0G 1M0**



**Phone: (250)353-7350
E-Mail: ashadra@telus.net**

September 28th, 2017

British Columbia Utilities Commission Sixth Floor
900 Howe Street, Box 250
Vancouver, B.C.
V6Z 2N3

Attention: Patrick Wruck, Commission Secretary

Dear Sir:

Re: FortisBC Inc. 2016 Long Term Electric Resource Plan (LTERP) and Long Term Demand Side Management Plan (LT DSM Plan)

Reply Submission to B-1-1- Errata:

I concur with FortisBC, CEC and the BCSEA/Sierra Club of BC that if at all possible we should avoid any delay in moving to final argument, and I am very appreciative of FortisBC for providing a response to my enquiry about the carbon tax moving from \$30 per tonne to \$50 by 2021.

That said, I observe in the Errata that the Company states:

“DSM savings targets are set as a percentage reduction of the growth in gross system load, but the economic potential of DSM measures, which is used to calculate the cost of the DSM Scenarios, was calculated at the customer’s meter, without consideration of line losses. In order to determine the impact of the DSM Scenarios on gross load, it is necessary to adjust for line losses (of 8 percent) in the calculation of the DSM Scenario costs. Applying the line loss adjustment both increases energy savings and reduces the costs of the DSM measures” (B-1-1, Errata, p 2-3).

Earlier, in response to a Commission Panel Information Request, the Company stated:

“FBC has not conducted the technical analysis to determine the impact on system losses of the CSPP. However, it is likely that transmission losses, which are estimated in the response to ICG IR 2.1.2 to be between 1 - 3 percent of gross system load, will be avoided due to the proximity of the CSPP generation to customer loads” (B-25 Panel IR#1.1.3).

Can I therefore suggest that FortisBC may wish to explain the reason for the difference in its answer to the Panel on August 24th and the position it takes towards DSM line losses in the Errata on September 15th in its Final Argument.

Further, I am curious as to what position the Company is going to take towards Net Metering customers who replace purchased electrical power with their own production, as well as Self-Generators like Celgar and Net Metering customers who transfer electrical power onto the

grid in a similar fashion to that described by the CSPP to the Panel.

Finally I would ask the Commission, if it accepts the FortisBC's proposed Intervenor Written Final Argument deadline as Friday October 27th, that the deadline for the FortisBC Inc. Application for Reconsideration and Variance of Order G-199-16 FBC Net Metering Program Tariff Update Decision ~ Phase 2 ~ Project No.3698875 Intervenor Final Argument be moved from Thursday, October 26th to Thursday, November 9th.

As stated earlier, trying to meet two written final argument deadlines simultaneously, for myself and potentially for Mr Scarlett, is an impractical impossibility.

All of which is respectfully submitted,
Andy Shadrack