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Our File No.: 05497-245

October 2, 2017

BY ELECTRONIC FILING

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

Attention: Patrick Wruck, Commission Secretary and Manager, Regulatory Support

Dear Sirs/Mesdames:

**Re: FortisBC Inc. 2016 Long Term Electric Resource Plan &
Long Term Demand Side Management Plan (BCUC
Project No. 3698896)**

We are counsel for FortisBC Inc. (**FBC**) in respect of the above noted proceeding. We write further to British Columbia Utilities Commission (**BCUC** or the **Commission**) Order G-139-17, by which FBC filed an Errata, dated September 15, 2017, and interveners were given until September 29, 2017 to provide written comments on further regulatory process.

The deadline for intervener comments has now passed. Of the five interveners that filed written comments, only British Columbia Old Age Pensioners Organization, et al. (**BCOAPO**) has submitted that additional information requests (**IRs**) are necessary regarding the Errata. BC Sustainable Energy Association and Sierra Club of BC (**BCSEA**), Commercial Energy Consumers Association of BC (**CEC**), Mr. Andy Shadrack, and the Industrial Customers Group (**ICG**) have all, like FBC, submitted that the matter should now proceed to final written argument.

BCOAPO's explanation of the need for additional IRs, as stated in its letter of September 27, 2017 (Ex. C8-6), is that: "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." BCOAPO does not elaborate on which of the corrections in the Errata it does not consider intuitively obvious. In fact, most of the Errata does simply involve corrected numeric values to DSM costs or to related data. Further, we submit that there would be limited, if any, benefit in a detailed explanation for particular corrections in the Errata, as BCOAPO intends to have addressed through further IRs. FBC has provided a reasonably thorough explanation of the overall basis for the changes to the LTERP and LT DSM Plan and the related IRs in its letter of September 15, 2017 (Ex. B-1-1). Additional IRs that would seem to only address the reason why certain (although unidentified) data was incorrect before and has now been corrected in the Errata will not help to resolve any issues regarding the LTERP that are being addressed

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in this process. It could also be time-consuming and costly as, depending on the nature of the IRs, FBC may be required to further engage Navigant to re-run portions of the CPR analysis with different parameters changed in order to demonstrate how incorrect values were corrected.

For these reasons, we respectfully reiterate FBC's position, shared by a clear majority of interveners, that this proceeding should now move to final argument.

Yours truly,

FARRIS, VAUGHAN, WILLS & MURPHY LLP

Per:



Nicholas T. Hooge

NTH/bd

c.c.: Registered Parties