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October 4th, 2017

British Columbia Utilities Commission Sixth Floor
900 Howe Street, Box 250
Vancouver, B.C.
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Attention: Patrick Wruck, Commission Secretary

Dear Sir:

Re: FortisBC Inc. Application for Reconsideration and Variance of Order G-199-16 FBC Net Metering Program Tariff Update Decision ~ Phase 2 ~ Project No.3698875

Request for Commission to Settle Matter of Answering Information Requests C4-6.1, C4-6.3.1, C4-6.3.ii and C4-6.6.iv In Accordance with Article 14.05 of the Rules of Practice and Procedure

With reference to section 14.05 of the Rules of Practice and Procedure, I request that the Commission settle the matter of whether questions C4-6.1, C4-6.3.i, C4-6.3.ii and C4-6.6.iv have been satisfactorily answered, which I contend they have not been.

Reasons for contention:

C4-6.1. Net Metered (NM) electrical energy, like Distributed Generation (DG) in general and Demand Side Management (DSM), are all different kinds and sources of produced/saved energy than that conceived when centralized electrical power production was introduced a little more than a century ago. Different kinds and sources of electrical energy come with varying costs that are not necessarily the same or congruent.

In B-18.24.iii of FortisBC Inc. 2016 Long Term Electric Resource Plan (LTERP) and Long Term Demand Side Management Plan (LT DSM Plan) ~ Project No.3698896, the Company provides a table that shows that the cost of purchasing PPA Tranche 1 BC Hydro RS 3808 energy differs from that of the cost of purchasing NM energy. While FortisBC has clearly stated the \$ value of purchasing each source of electrical energy (B-11.3.i), that \$ value only represents a portion of all the costs of delivery of that energy to the customer, as acknowledged by the Company in B-11.4.

In order to better understand the total cost of delivering each source of electrical energy, I ask the Commission to direct FortisBC to more fully answer the question as, without an understanding of what it costs to deliver each source of energy, I do not believe that we can obtain a full understanding of what a fair and reasonable price for NEG might be.

C4-6.3.i In answer to B-11.3.i, the Company provides a table that leaves the impression that the cost value gap between purchasing PPA Tranche 1 BC Hydro RS 3808 electricity and NM electricity is \$76. Since we do not know what it costs to deliver either source of electrical energy we have no way of knowing whether the information provided is a correct assertion of the cost value gap of providing that electrical energy to the customer.

What we now know so far, based on answers to B-11.1.i and B-11.2, is that NM electricity can be delivered for somewhere between \$1.50 and \$4.00 per MWh cheaper than PPA Tranche 1 BC Hydro

RS 3808, because, as with DSM, there are currently no line losses associated with the delivery of NM power. Unless we know what the actual cost of delivering each source of electrical energy is, we cannot know the overall cost of each source, and as a consequence it is simply impossible to verify the Company's contention that NM Net Excess Generated (NEG) power costs both the Company (and hence the customer) more than PPA Tranche 1 BC Hydro RS 3808 electrical power when delivered.

I therefore ask the Commission to direct FortisBC to more fully answer the question, so we can gain a complete understanding of what each source of power costs the Company to purchase and deliver.

C4-6.3.ii As noted in B-18.24.iii of FortisBC Inc. 2016 Long Term Electric Resource Plan (LTERP) and Long Term Demand Side Management Plan (LT DSM Plan) ~ Project No.3698896, the Company provides a table that shows NM energy has no fixed costs associated with its purchase, whereas PPA Tranche1 BC Hydro RS 3808, as I understand the Company's answer, has both fixed and variable costs associated with its purchase.

I simply want to understand the cost variables that the Company is using towards creation of the tariff price for each source of power, especially when the Company acknowledges that one source has no fixed costs and the other has both fixed and variable costs. I simply cannot comprehend how FortisBC can have the same cost value to the Company if the source of cost for each is differently calculated with and without fixed costs and with different variable ones as well.

I therefore ask the Commission to direct FortisBC to more fully answer the question, so that we can all gain a complete understanding of what each source of power costs the Company to buy and deliver.

C4-6.iv. My apologies to FortisBC if they did not fully comprehend the question, but I was asking what percentage the three cheques in the value of \$35,212 in 2016 and the two cheques in the value of \$18,375 in 2017 represented as a portion of the "*entire dollar (\$) value of electricity transferred from NM CGs*", meaning all kWh both NEG and non-NEG transferred from all 86 plus enrollees in the program. To be clear I am trying to understand the percentage of \$ value of all transferred kWh that exceeds all customers' costs of the Company purchasing power in, say, 2016 and 2017 to the point of previous calculation.

I therefore ask the Commission to direct FortisBC to more fully answer the question as it was originally framed.

In conclusion, given that FortisBC has proposed that final intervenor argument in the FortisBC Inc. 2016 Long Term Electric Resource Plan (LTERP) and Long Term Demand Side Management Plan (LT DSM Plan) ~ Project No.3698896 be filed by Friday October 27th. I request that the date for filing final intervenor argument in 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 be moved back to Thursday, November 9th, so that Mr Scarlett and myself are not required to prepare two sets of final arguments simultaneously, which is not practical for either of us to attempt.

All of which is respectfully submitted,
Andy Shadrack