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April 24, 2018

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

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

Dear Mr. Wruck:

**Re: FortisBC Inc. (FBC) 2017 Cost of Service Analysis and Rate Design Application
Project No. 1598939
FBC Reply Comments on Regulatory Timetable**

On April 18, 2018, FBC filed its comments on the remainder of the revised Regulatory Timetable in the proceeding referenced above. FBC respectfully submits the following reply comments in accordance with British Columbia Utilities Commission (the Commission) Exhibit A-6 to the comments of BC Sustainable Energy Association and the Sierra Club of BC (BCSEA) (Exhibit C2-3) and the Industrial Customers Group (ICG) (Exhibit C12-3).

The comments of the Anarchist Mountain Community Society and Regional District of Okanagan-Similkameen (Exhibit C3-4), the Irrigation Ratepayers Group (Exhibit C8-3), Resolution Electric Ltd. (Exhibit C9-3) and the Commercial Energy Consumers Association of British Columbia (Exhibit C10-4) are supportive of one or other of FBC's proposed or agreed to approaches, and as such FBC does not address them further below.

Contrary to what seems to have been assumed in the BCSEA and ICG submissions, FBC does not understand Exhibit A-6 to have invited submissions from participants on a re-sequencing or reconstitution of steps in the regulatory timetable other than to the limited extent proposed by the Kaslo Senior Citizens Association – Branch No. 81 (KSCA). In FBC's respectful submission, no change in circumstances has occurred since either the procedural conference held on March 6, 2018, or the Commission's carefully reasoned Order G-62-18 setting out steps in that timetable, to make a broader revisiting of the sequence within the timetable, or its components, appropriate.

What did occur since Order G-62-18 was the filing of a volume of information requests (IRs) that necessitated (1) the extension that the Commission granted in Exhibit A-6, and (2) consideration in light of that extension, the extent to which other dates in the existing regulatory timetable should be deferred. KSCA's further request in its letter of April 10, 2018

for a timetable amendment (Exhibit C4-5) seemed at least to be associated with facing the large volume of pending IR responses, so generally made within the same context.

However, in its letter dated April 19, 2018 (Exhibit C2-3), BCSEA proposed a broad range of re-sequencing in, and “firming up” of (by removing certain qualifications), the regulatory timetable set in Order G-62-18. BCSEA simply seems to be re-arguing points decided in Order G-62-18 but without explaining why those matters should be addressed again. FBC opposes this general set of departures from the sequence and content of the existing regulatory timetable, and relies on the arguments made in support of the original result in G-62-18. Among other things, BCSEA notes in Exhibit C2-3 that it “would not oppose a Commission decision at this time simply to include an oral hearing in the schedule”. The potential inclusion as a “default” option of an oral hearing was among the points addressed at some length during the procedural conference and denied, though a placeholder date was provided (and retained, with an adjusted date, in FBC’s proposed regulatory timetables in Exhibits B-5 and B-6).

In its letter dated April 19, 2018 (Exhibit C12-3), ICG supports elements of the BCSEA submission which, as noted above, FBC opposes. ICG also suggests that KSCA had itself proposed that the filing of intervener evidence be deferred until after the filing of responses to a second round of IRs, but that interpretation appears to go beyond what KSCA requested in Exhibit C4-5, which related to the first round of IRs.

In all the circumstances, FBC reaffirms its support for the timetable proposed in Exhibit B-6 or, alternatively, its earlier proposal in Exhibit B-5.

If further information is required, please contact Corey Sinclair at 250-469-8038.

Sincerely,

FORTISBC INC.

Original signed:

Diane Roy

cc (email only): Registered Parties