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April 24th, 2018

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

Attention: Patrick Wruck, Commission Secretary

Procedural Submission Response

FortisBC Inc 2017 Cost of Service Analysis and Rate Design

I write further to the Kaslo Senior Citizens Association - Branch #81 (KSCA81) procedural submission (C4-4) of April 10th and the Commission Panel Directive (A-6) of April 16th.

KSCA81 concurs with the submission of BCSEA-SCBC, especially as outlined at paragraph 8 and 10 of their submission (C2-3) of April 18th, and also concurs with ICG's submission (12-3) of April 18th that, to determine if an oral hearing is necessary, there only needs to be one more round of procedural submissions after all the evidence has been filed (including rebuttal evidence, if any, filed). KSCA81 also concurs with the second of two possible times suggested by BCSEA-SCBC at paragraph 10.

KSCA81, in particular, concurs with the BCSEA-SCBC statement that it:

"...respectfully disagree with requiring interveners to file evidence before FBC has entered its evidence in chief (ie excluding evidence in rebuttal to intervener evidence)".

Likewise KSCA81 concurs with IRG, C8-3 April 19th, when it states that it:

"...disagrees with FBC's suggestion in Exhibit B-6 that "...interveners intending to submit evidence, can and should be concurrently working on their evidence now as their evidence is unlikely to be forthcoming solely as a result of FBC responses to IRs No 1." In the IRG's case, most of it's contemplated evidence will arise from or be significantly influenced by FBC's IR responses".

In that context KSCA81 also concurs with both additional observations of BCSEA-SCBC and ICG that, given the large volume of IR#1s, IR#2s are now likely inevitable as a follow up to IR#1 responses from FBC. This, in KSCA81's opinion, and contrary to FBC's response of April 24th, was not known when the Commission panel issued Order G-62-18 on March 16th and therefore materially changes the circumstances under which the panel made its ruling.

Further, KSCA81, in acknowledging the submissions of FortisBC (B6, April 18th) and AMCS/RDOS (C3-4, April 19th), believes that the proposed timetable of BCSEA-SCBC at paragraph 10 addresses the concerns expressed by FortisBC and AMCS/RDOS that they be given adequate ability to rebut any intervener evidence after it is filed.

Further, given the kaleidoscope of issues percolating within the residential class COSA and rate design:

- i. Is Minimum System methodology appropriate
- ii. Electric heat versus Non-Electric heat
- iii. Appropriate allocation of costs between high end users versus low-end users/low income customers

KSCA81 continues to support the original AMCS/RDOS procedural proposition to hold an oral "round

table”, if not a full blown oral cross examination on the evidence, and again agrees with the BCSEA-SCBC submission at paragraph 6(c).

Given my recent determined unavailability between August 1st and 8th, it is suggested that the weeks starting August 13th and August 20th be considered as placeholder times for an oral “discussion”/cross examination on the evidence.

Finally KSCA81 wishes to reiterate, again, their ongoing desire to see that residential customers be given some kind of ability to make oral submissions to the Commission panel in this important hearing. In this context it is noted that I was appointed to represent KSCA81 at their February monthly meeting, but it was not until (after filing for intervener status) the procedural conference on March 6th that several seniors then came forward with their billing issues orally. Thereafter I encouraged them to write to the Commission, and then chose to incorporate those issues brought to my attention into section 3 of KSCA81’s IR#1.

This underscores KSCA81’s concern that many residential customers will either not write down their concerns and issues and/or send them in as letters of comment to this hearing. However, when given the opportunity to attend a meeting where they can make oral submission, the level of participation would be considerably higher, as instanced by attendance at the FBC Open House (online in Kaslo) and the procedural conference (online in Kaslo).

KSCA81 therefore respectfully submits, while acknowledging both the cost and time necessary for the Commission panel to travel, that a compromise be considered of setting aside some times for residential customers to address the Commission panel via a video conference link to the BCUC conference center in Vancouver, and remote sites/teleconference links in the FortisBC service area. This, for example, would work well at the Seniors Hall in Kaslo via their flat screen TV, linked to a laptop, and would be better than using a cell phone/landline to call in individually as there are obviously problems with that kind of communication link.

It is KSCA81’s understanding that most small rural communities now have good video conferencing capability through their municipal council chambers, if not a local community hall like the KSCA81 one, and it is assumed that BCUC in Vancouver has a good video conference link as well.

All of which is respectfully submitted,
Andy Shadrack
for Kaslo Seniors Community Association – Branch #81