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C O R P O R A T I O N

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eFiled

May 18, 2018

British Columbia Utilities Commission
6th Floor 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
Irrigation Ratepayers Group Submissions on Further Process**

We are writing on behalf of our clients the Irrigation Ratepayers Group (IRG) in response to the British Columbia Utilities Commission's (the Commission) request in Exhibit A-8 for submissions on further process, as clarified in Exhibit A-9. Each of the three questions posed by the Commission are addressed in turn below.

1. What is the appropriate timing of intervener evidence and why.

IRG submits that the filing of Intervener evidence is best scheduled for a time after all IRs have been completed and Interveners have had a reasonable time to review and consider the Responses to IRs. In this proceeding, if the Commission orders a second round of IRs, filing of Intervener evidence should follow that event. To do otherwise would create an unnecessary burden on Interveners to anticipate further evidence from FBC (i.e. in the form of its subsequent Responses to round two IRs), which would be both prejudicial and inefficient.

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2. *Whether or not parties intend to file intervener evidence. Parties must specifically identify the nature of the evidence they intend to file and explain how this evidence is relevant to the issues in the proceeding.*

While the IRG recognizes how Interveners' answers to this question may be of assistance to the Commission in determining further process, forcing the question at this time would tend to put Interveners at a serious disadvantage. In contrast, Applicants including FBC are generally given an optional right to file Rebuttal evidence, and are required to make a decision whether to file any Rebuttal only after they have seen the entirety of Intervener evidence.

In these circumstances, the uncertainty regarding a possible second round of IRs makes it much more difficult for the IRG to determine whether or not filing its own evidence will be necessary. The IRG would prefer to be given the opportunity to submit a second round of IRs (details of which is discussed in the next section) and thereafter determine whether it will file Intervener evidence. Depending on FBC's Responses to a second round of IRs, the IRG may determine that filing its own evidence is unnecessary.

In the event that a second round of IRs will not be available the IRG anticipates that it would file Intervener evidence, which would be intended to establish that the KID request for an optional off-season TOU Irrigation and Drainage rate is fair, appropriate, and feasible to determine within the timeframe of the current proceeding.

Given FBC's Response to IRG IR 1.5.11 stating that "... there may be impacts on other customers, and general customer interest..." indicates that evidence related to an optional off-season TOU Irrigation and Drainage is clearly relevant in the context of this COSA and Rate Design proceeding.

3. *Whether or not a second round of IRs is necessary and why. If a second round of IRs is required, please identify any topics which do not need to be included in IR No. 2 and can proceed to written argument.*

In making submissions on this question, the IRG is guided by the Commission reminder to parties that:

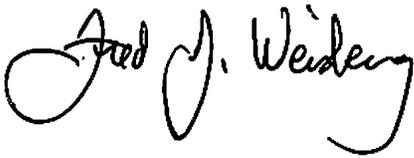
"... when preparing their process submissions to focus their review of IR No. 1 responses on the specific area(s) of relevance to their participation in the proceeding, as identified in parties' Request to Intervene forms. It is not expected, nor is it necessary, for all parties to read all responses to IR No. 1 in most cases."¹

¹ Exhibit A-9, p. 2.

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IRG submits that based on our initial review of FBC's Responses to IRG IR No. 1 we anticipate that the IRG would make a number of further IRs if a second round is provided. The objective of those IRs would be to explore in more detail why FBC considers it necessary to postpone addressing the KID request for an optional off-season TOU Irrigation and Drainage rate, the feasibility of addressing the issue within the timeframe of the current proceeding as informed by the Commission's determinations of further process, and the extent of possible prejudice to KID and other Irrigation customers if that issue is indefinitely postponed until a "stand-alone ... public regulatory review".²

Yours truly,

A handwritten signature in black ink that reads "Fred J. Weisberg". The signature is written in a cursive style with a large initial "F" and a long, sweeping underline.

Fred J. Weisberg
Barrister & Solicitor
Weisberg Law Corporation
Counsel to the Irrigation Ratepayers Group

² Exhibit B-16, p. 17, Response to IRG 1.5.11.