

**Date Submitted:** August 10, 2018

**Proceeding name:** FEI Annual Review for 2019 Delivery Rates

## **Participant contact information**

**Organization or individual name:** Commercial Energy Consumers Association of British Columbia (the "CEC")

**City:** Vancouver

**Province:** British Columbia

**Email:** [dwcraig@allstream.net](mailto:dwcraig@allstream.net)

**Phone number:** 6043512332

## **For organizations only - representative contact information**

**Name:** Christopher Weafer

**Organization (if different from above):** Owen Bird Law Corporation

**City:** Vancouver

**Province:** British Columbia

**Email:** [cweafer@owenbird.com](mailto:cweafer@owenbird.com)

**Phone number:**

**Also representing (if applicable):**

## **Additional information**

**Please state your reasons for intervening in this proceeding:**

he CEC is composed of members which are commercial class customers of FEI, a significant portion of FEI's rate base.

**Please state how you are directly or sufficiently affected by the Commission's decision in this matter; or describe your experience, information, or expertise relevant to this matter that would contribute to the Commission's decision making:**

The interests and rates of the CEC's members will be affected by this application and therefore, it is important that the CEC is represented in this proceeding in order to ensure that the members' interests are articulated and represented. The CEC's participation will also assist in ensuring that a balanced approach is considered by the Commission in reviewing FEI's Application and that commercial class customer ratepayers' interests are considered. The CEC has been actively represented on a consistent basis before the Commission since 2003.

**Please list the key issues you intend to address in the proceeding:**

Appropriateness and functioning of the PBR Plan related to O&M, staffing, major initiatives and capital expenditures. Appropriateness of all information and all calculations related to PBR and all the formula drivers  
Appropriateness of the calculation of the revenue requirement  
Appropriateness of the demand forecast and revenue forecast  
Appropriateness of O&M and capital forecast expenditures outside formula  
Appropriateness of expenses related to depreciation and amortization  
Appropriateness of expenses related to financing and return on equity and taxes  
Evaluation of company performance based on Service Quality Indicators  
Appropriateness of new deferral accounts and additions to existing deferral accounts  
Appropriateness of calculations related to earnings sharing and rate riders  
Appropriateness of FEI's approach to accounting matters and exogenous factors  
Any other issues of relevance to Commercial sector ratepayers.

## **For administrative purposes only**

**Do you intend to participate fully, including attendance at hearings and submission of evidence or information requests, if applicable?:** Yes

**Do you intend to request PACA funding? This does not impact your ability to participate:** Yes

**Have you or your organization web-registered as an intervener or interested party in the past 12 months?:** Yes

**If yes, please provide your username:** CECBC