

October 25, 2018

**VIA E-FILING**

Patrick Wruck  
Commission Secretary  
BC Utilities Commission  
6th Floor 900 Howe Street  
Vancouver, BC V6Z 2N3



Reply to: Leigha Worth  
lworth@bcpiac.com  
Ph: 604-687-3034  
Our File: 7310.130

Dear Mr. Wruck,

**Re: FortisBC Energy Inc. - Annual Review for 2019 Delivery Rates**

We make the following submissions on behalf of our clients, the British Columbia Old Age Pensioners' Organization, Active Support Against Poverty, Council of Senior Citizens' Organizations of BC, Disability Alliance BC, and the Tenant Resource and Advisory Centre, known collectively in this process as "BCOAPO et al.". The constituent groups of BCOAPO et al. represent the interests of low and fixed income residential energy consumers within BC and more specifically in this process, the interests of FortisBC Energy Inc.'s ("FEI" or "Fortis") low and fixed income residential ratepayers.

On October 19, 2018, FEI filed Exhibit B-10, a letter requesting interim rates to be set at 1.1% as a precaution should the Commission decide to reject its application to hold rates flat. However, on October 23, 2018, FEI took the unprecedented step of amending in a material way its application for Delivery Rates, just days before interveners were scheduled to file our Final Arguments. The timeline for the Annual Review Submissions is compressed – compressed enough that the undersigned and her expert are confounded as to why the Utility has chosen to do this at this time.

Unfortunately, given that this is a material change, it does at least potentially alter our position on the application but we have not been given enough time to go back and review the Workshop transcript as well as any other documentation we may need to try to determine why FEI has at this time chosen this course of action when the apparent trigger is, in utility terms, not a significant change.

At present, we are preparing a Final Argument for the FEI DSM Application due today and our expert is not available to engage in this analysis. Without an extension, we will be unable to adequately respond to this change and our clients' interests will suffer significant prejudice. As this is an extraordinary circumstance, we are asking for Commission approval of an extension for BCOAPO to file its final argument on Monday, October 29, 2018. We have given FEI notice of our intention to seek this extension but we do not know what position the Utility will take on this application.

Sincerely,  
**BC PUBLIC INTEREST ADVOCACY CENTRE**

*Original on file signed by:*

Leigha Worth  
Executive Director | General Counsel