

April 4, 2019

**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: 7310.220

Dear Mr. Wruck,

**Re: FortisBC Energy Inc. Certificate of Public Convenience and Necessity Application  
for the Inland Gas Upgrade Project ~ Project No. 1598988  
BCOAPO Submission on Further Process**

We represent the BC 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 regulatory processes before the BCUC as "BCOAPO et al." ("BCOAPO").

Enclosed please find the BCOAPO's Submission on Further Process with respect to the above-noted matter.

If you have any questions, please do not hesitate to contact the undersigned.

Sincerely,  
**BC PUBLIC INTEREST ADVOCACY CENTRE**

*Original on file signed by:*

Leigha Worth  
Executive Director | General Counsel



Encl.

**BC 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  
("BCOAPO")**

**FORTISBC ENERGY INC. ("FEI") CERTIFICATE OF PUBLIC CONVENIENCE AND  
NECESSITY APPLICATION FOR THE INLAND GAS UPGRADE PROJECT  
("IGU PROJECT") ~ PROJECT No.1598988**

**Intervener Submission on Further Process**

**April 4, 2019**

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Please be advised that we provide the following submission regarding the above noted application on behalf of our client groups known in this and other regulatory processes as BCOAPO or BCOAPO et al. The constituent groups of BCOAPO et al. represent the interests of low- and fixed-income energy consumers within BC and more specifically in this process, the interests of FEI's low and fixed income residential ratepayers who may be impacted by approval of the IGU Project.

We provide this submission in accordance with the regulatory timetable established by Commission Order G-11-19 (Exhibit A-2). By letter dated March 29, 2019 (Exhibit A-7), the Commission requested that parties address the following questions:

1. *Whether a second round of IRs is required;*
2. *Whether parties intend to submit evidence (if so, please describe the nature of that evidence);*
3. *If other processes such as a workshop, streamlined review process and/or oral hearing should be considered by the Panel (if so, given the complexity of the Application, please specify the area(s) in the Application that should be included as part of the proposed process); and*
4. *A proposed timeline for all of the aforementioned processes, including parties' periods of unavailability during the remainder of 2019.*

## 1. Whether a second round of IRs is required

In Exhibit B-7, filed with the Commission on March 28, 2019, FEI stated:

*... On March 28, 2019, FEI submitted its responses to information request (IR) round No. 1.*

*During the course of responding to IRs, FEI identified some corrections to the Application as well as updated information for which it plans to file an Evidentiary Update. As part of the Evidentiary Update includes information from consultants, FEI expects to be able to file the Evidentiary Update on or before Friday, April 5, 2019. ...*

*FEI does not believe that the timing of the Evidentiary Update will require a change to the submissions on further process, currently scheduled for Thursday, April 4, 2019, in accordance with the regulatory timetable established in British Columbia Utilities Commission Order G-11-19.*

[Emphasis added]

With respect, BCOAPO disagrees with the last sentence of the above reproduced submission.

BCOAPO notes that at the time of preparing its comments to the BCUC and according to the timeline provided by the Utility itself, no Evidentiary Update has yet been provided to intervenors nor did FEI contemplate doing so before today's deadline.

Given the scale, complexity, and rate impacts of the proposed project – along with BCOAPO's inability to divine the substance and nature of said update in advance of its filing by FEI – BCOAPO submits that said evidence should be filed and available to parties before they abrogate their rights to any further discovery. If it is as responsive and informative as FEI appears to believe it will be, there would presumably be little left to ask. If, however, the Commission and Interveners are left with reasonable questions after that filing, it would unfairly compromise our interests to abjure a chance to pose those questions.

As such, BCOAPO submits that the only fair and prudent solution is to allow for is:

- (i) to allow parties to submit interrogatories after an examination of the Evidentiary Update, and

- (ii) to allow parties to obtain any clarifications or elaborations necessary with respect to the first-round interrogatory responses.

**2. Whether parties intend to submit evidence (if so, please describe the nature of that evidence)**

BCOAPO does not intend to file evidence in this proceeding.

**3. If other processes such as a workshop, streamlined review process and/or oral hearing should be considered by the Panel (if so, given the complexity of the Application, please specify the area(s) in the Application that should be included as part of the proposed process)**

Again, BCOAPO does not know the scope or nature of the Evidentiary Update at the time of writing. BCOAPO submits that there may be merit in a workshop. As a result, BCOAPO is not able to offer a properly informed and considered position on the appropriate process.

**4. A proposed timeline for all of the aforementioned processes, including parties' periods of unavailability during the remainder of 2019**

In the interest of regulatory efficiency, BCOAPO submits that it is able to accommodate filing the proposed second round of IRs one week after the Evidentiary update is filed.

All of which is respectfully submitted.

Sincerely,  
**BC PUBLIC INTEREST ADVOCACY CENTRE**

Original on file signed by

Leigha Worth

Executive Director | General Counsel

