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VIA ELECTRONIC MAIL

British Columbia Utilities Commission
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**Attention: Patrick Wruck, Commission Secretary
 and Manager, Regulatory Support**

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Dear Sirs/Mesdames:

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

We are counsel to the Commercial Energy Consumers Association of British Columbia (the “CEC”). We are responding to the Commission’s letter of March 29, 2019 (Exhibit A-7), and provide answers to the questions put forth by the Commission as noted below:

- Whether a second round of IRs is required.

Yes the CEC supports a second round of Information Requests.

The application is significant, representing over \$300 million in capital spending and deferred costs over a six year period. FEI proposes to upgrade some 29 transmission laterals under a single CPCN and intends to utilize three different technologies to do so.

The CEC is of the view that the evidentiary record could benefit from further development in several areas including project justification, alternatives analysis, project costing and timing among others. The CEC anticipates that prioritization and the development of alternative approaches may be important subjects for further development in the evidentiary record and offer potential benefits.

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

The CEC is investigating the benefit of robotic tools to more cost effectively achieve the objectives of the CPCN and will further pursue this in the second round of Information Requests to avoid trying to lead evidence and can best assess whether evidence is a benefit

after that second round of questions. At this time the CEC does not intend to submit 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).

The CEC would prefer commenting on this matter after reviewing the Evidentiary Update materials due to be filed tomorrow by FEI. The CEC sees potential benefit and regulatory efficiency in a Workshop where issues can be discussed candidly and informally. The magnitude of investment in this CPCN is significant and an oral hearing may be required to achieve a higher level of comfort if the need for the order of magnitude of investment is not more convincingly established by FEI.

The CEC considers that a workshop addressing the state of robotic technologies could potentially be of benefit to the Commission in assessing the appropriateness of the alternatives assessment, cost effectiveness, project timing and the opportunities for the project to contribute to advancing beneficial technologies.

FEI screened out the potential for robotics based on FEI's understanding of the state of commercial readiness of the technologies (not commercially ready) and the inapplicability of robotics to its NPS 6 pipelines.¹

The CEC notes that FEI has expressed interest in pursuing pilot testing in its future evaluation of robotic inspection technologies but states that the timeline for robotic in-line inspection technology to become proven and commercialized is not known and uncertain at this time.²

The CEC does not find significant urgency for the project on the evidentiary record, and submits it could be enlightening for further examination of the potential options to be advanced at this time.

The CEC notes that there are several references in the public domain to the increasing use of robotics in pipeline inspection, suggesting ongoing development.

The CEC understands that at least one company is expecting to have robotic inline inspection technology for 6" pipeline available as soon as next year.

The CEC may be willing to sponsor a workshop to provide information to the Commission regarding the state of robotics at present and the potential for development in the appropriate time frame for this CPCN.

¹ Exhibit B-5, CEC 1.21.1

² Exhibit B-5, CEC 1.21.2

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

The CEC notes that there are several proceedings before the BCUC that do not have established time frames as of yet.

The CEC's workload and consultant access will restrict the CEC's availability between August 7, 2019 and September 15, 2019.

The CEC proposes the following process:

<i>BCUC and Intervener IR #2</i>	<i>Friday May 10, 2019</i>
<i>FEI Responses to IR #2</i>	<i>Friday May 31, 2019</i>
<i>Potential Workshop</i>	<i>Friday June 28, 2019</i>
<i>Procedural Conference</i>	<i>Friday July 12, 2019</i>

If you have any questions regarding the above, please do not hesitate to contact the writer.

Yours truly,

OWEN BIRD LAW CORPORATION



Christopher P. Weafer

CPW/jj

cc: CEC
cc: FortisBC Energy Inc.
cc: Registered Interveners