

August 22, 2019

VIA E-FILING

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



Reply to: Leigha Worth
ED@bcpiac.org
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 Information Requests No. 3**

We represent the BC Old Age Pensioners' Organization, Active Support Against Poverty, Council of Senior Citizens' Organizations of BC, Disability Alliance BC, and Tenant Resource and Advisory Centre, known collectively in regulatory processes as "BCOAPO et al." ("BCOAPO").

Enclosed please find the BCOAPO's Information Requests No. 3 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.

REQUESTOR NAME: BCOAPO *et al.*
INFORMATION REQUEST ROUND NO: #3
TO: FortisBC Energy Inc. (FEI)
DATE: August 22, 2019
APPLICATION NAME: Certificate of Public Convenience and Necessity (CPCN) Application for the Inland Gas Upgrade Project (IGU)

1.0 Reference: General and Exhibit B-12, BCOAPO IR 2.4.1

- 1.1 When did FEI initially determine or become aware that there was a potential rupture problem on the subject pipelines due to undetectable external corrosion?
- 1.2 Please provide the date on which FEI began work on the subject application.

2.0 Reference: Exhibit B-12, BCOAPO IR 2.6.1

- 2.1 If available, please provide an estimate of the cost of providing a QRA in support of the instant application or provide direction as to where such an estimate can be found in the evidence.

3.0 Reference: Exhibit B-10, BCUC IR 2.36.1

The following is excerpted from the referenced response:

JANA's technical opinion is that, given the short project timeline of five years for the IGU project, a QRA would not materially impact the timeline or scheduling of these activities.
[Emphasis added.]

- 3.1 In JANA's opinion, had the work been scheduled over a longer period, would a QRA have been of use to the BCUC and intervenors in assessing the instant application? If not, please clarify the relevance of "the short project timeline" that JANA conditions its response upon.

4.0 Reference: Transcript V1 Workshop/Procedural Conference, page 10

The referenced page states:

For now, let's take a look at the risk. Of course, risk is equal to the probability of an undesirable event occurring times the consequences of that event if it occurs.

- 4.1 Can FEI confirm that “the probability of an undesirable event occurring times the consequences of that event if it occurs” is the expected loss associated with the event rather than the “risk”?

5.0 Reference: Transcript V1 Workshop/Procedural Conference, page 14

The referenced page states:

Our professional engineers consider factors such as equipment condition data, industry practice, current codes and regulations, and many more to determine both the capital and maintenance work that is needed for our system. That is still a valid process, and the BC OGC has not indicated otherwise.

- 5.1 Has there ever been an occasion when the BC OGC has indicated to FEI that FEI’s processes or practices were not valid? If so, please elaborate.

6.0 Reference: Transcript V1 Workshop/Procedural Conference, page 27

The referenced page states:

MR. CHERNIKHOWSKY: Okay, so we’ve seen numerous examples of CP shielding occurring on many of our pipelines, and that’s also why we say we have reduced confidence in our ability to use ECDA to detect external corrosion.

- 6.1 When FEI has detected CP shielding in the past, what corrective measures has FEI taken?

7.0 Reference: Transcript V1 Workshop/Procedural Conference, pages 40-41

The referenced pages state:

THE CHAIRPERSON: And were you asked to opine on whether or not FEI has done a qualitative assessment of the need for the project on the 29 laterals or was that out of the scope of your retainer?

MR. OLIPHANT: We were not asked to specifically assess what qualitative assessment they had done.

THE CHAIRPERSON: Thank you.

MR. CHERNIKHOWSKY: Just to further clarify that though, JANA was provided with all the information relevant in the application, so they were certainly aware of the drivers of justification that we had put forth to the panel.

THE CHAIRPERSON: But they were not asked to opine on that in terms of sufficiency or the adequacy of that assessment, correct?

MR. OLIPHANT: We were not specifically asked to assess on that basis, but as a professional engineering firm if we had seen any issues we would have advised Fortis on that.

- 7.1 Please provide the Terms of Reference under which FEI retained JANA in respect of and is applicable to the instant application. Alternatively, please provide direction as to where the requested information can be found in the evidence filed in this proceeding.