



December 20, 2019

Sent via email/eFile

**FEI – COMPLAINT BY CASCADIA ENERGY, DIRECT  
ENERGY AND ACCESS GAS EXHIBIT A-4**

Mr. Doug Slater  
Director, Regulatory Affairs  
FortisBC Energy Inc.  
16705 Fraser Highway  
Surrey, BC V4N 0E8  
gas.regulatory.affairs@fortisbc.com

**Re: FortisBC Energy Inc. – Administration of Rate Schedules 22, 23, 25 and 27 - Complaint filed by Cascadia Energy Ltd., Direct Energy Marketing Ltd. and Access Gas Services Inc. – Information Request No. 1**

Dear Mr. Slater:

Further to British Columbia Utilities Commission Order G-340-19, enclosed please find BCUC Information Request No. 1. In accordance with the regulatory timetable, please file your responses on or before Wednesday, January 15, 2020.

Sincerely,

*Original signed by:*

Patrick Wruck  
Commission Secretary

KN/dg  
Enclosure

cc: Nick Caumanns  
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FortisBC Energy Inc.  
Complaint filed by Cascadia Energy Ltd., Direct Energy Marketing Ltd and Access Gas Services Inc.

**INFORMATION REQUEST NO. 1 TO FORTISBC ENERGY INC.**

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- 1.0 Reference: FEI Response to BCGMC Complaint  
Exhibit C-1-1, FEI letter dated October 11, 2019, p. 4; Exhibit B-2, BCGMC letter dated November 6, 2019, p. 5  
Shipper Agents Access to Data**

On page 4 of its letter, FortisBC Energy Inc. (FEI) states:

All Shipper Agents today have access to a self-serve information platform called Web Information & Nomination System (WINS) to view individual customer and group demand by day, historical customer consumption, authorized supply from the interconnects, system inventory, and imbalances. Customer demand is updated daily, and Shipper Agents can access their customer information 24 hours a day.

However, Cascadia Energy Ltd., Direct Energy Marketing Limited, Access Gas Services Inc. (BCGMC) on page 5 of its letter states that “2,361 T-Service customers rely upon volume data that is three days old once nomination practices and deadlines are taken into account.”

- 1.1 Please outline what is contained in the volume data provided to Shipper Agents and T-service customers.
- 1.2 Has the volume data changed since the 2016 Rate Design Application (RDA) approval?
- 1.3 Has the quality of the volume data provided to Shipper Agents and T-service customers changed since the 2016 RDA approval? Please explain your response.
- 1.4 Does FEI consider the quality of data provided to all its T-service customers appropriate for managing daily gas supply requirements? Why or why not?
- 1.5 Please confirm or explain otherwise if the volume data provided on the WINS platform is updated daily, including weekends. As a part of your answer please explain whether or not some Shipper Agents or T-Service customers rely on data that is three days old.
  - 1.5.1 Are there circumstances in which the data would be older than a day? If yes, please outline the circumstances.
- 1.6 Please provide the percent of Shipper Agents that have access to FEI’s SCADA information, in terms of percentage of total T-Service demand and number of Shipper Agents.
- 1.7 Please elaborate on how FEI’s determines which customers receive access to its SCADA information.

**2.0 Reference: FEI Response to BCGMC Complaint  
Exhibit C1-1, FEI letter dated October 11, 2019; Exhibit B-2, BCGMC letter dated  
November 6, 2019, p. 3  
Penalty Charges and Balancing Rules**

On page 3, BCGMC states:

FEI's Figures 2 and 3 are misleading since the Enbridge rupture affected interior and lower mainland transport customers differently. Lower mainland customers did not have access to imbalance return throughout November 2019. It is clear that "Shipper Agent B" was able to access imbalance return service in mid-November, which is denoted by the drop in cumulative inventory, so served primarily interior customers. This access to imbalance return was not available to "Shipper Agent A" (primarily lower mainland customers) from Figure 2.

- 2.1 Please comment on the above statement from BCGMC and confirm if "Shipper Agent B" had access to imbalance returns that "Shipper Agent A" did not have access to.
- 2.2 Under what circumstances would the different Shipper Agents "A and B" have different access to the imbalance returns?
- 2.3 Are the Shipper Agents from the interior treated any differently from the Shipper Agents in the lower mainland? If yes, please explain your response.
- 2.4 Are the various Shipper agents in the lower mainland treated differently from each other? If yes, please explain your response.
- 2.5 During the Enbridge rupture, was the imbalance management discriminatory against any Shipper Agent groups? Please explain your response.

**3.0 Reference: FEI Response to BCGMC Complaint  
Exhibit C1-1, FEI letter dated October 11, 2019, p. 14  
Complaints**

On page 14, FEI states that it has not received any complaints from the other ten Shipper Agents.

- 3.1 Please state if FEI has received other complaints regarding this matter from other T-Service customers.