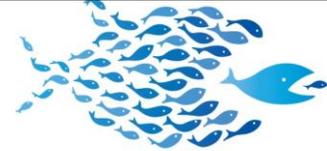


12 May 2020

**VIA E-FILING**

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



**BCPIAC**  
Public Interest Advocacy Centre

Reply to: Leigha Worth  
lworth@bcpiac.com  
Ph: 604-687-3034  
Our File: 7400.112

Dear Mr. Wruck,

**Re: Pacific Northern Gas Ltd. And Pacific Northern Gas (N.E.) Ltd. ("PNG")  
Application for Approval of COVID-19 Deferral Account**

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 Request No. 1 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:** #1  
**TO:** Pacific Northern Gas Ltd. and Pacific Northern Gas (N.E.) Ltd. (“PNG”)  
**DATE:** May 12, 2020  
**APPLICATION NAME:** Application for Approval of COVID-19 Deferral Account

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**1.0 Reference: Exhibit B-1, Application**

BCOAPO notes that this application specifies it is seeking approvals to facilitate the deferral of bills incurred until June 30, 2020.

- 1.1 Please explain on the record how the Utility determined that a three-month bill deferral was an appropriate response to the COVID-19-related economic impacts?
- 1.2 Please indicate on the record what, if any, other forms of relief the Utility considered in response to this economic crisis?
  - 1.2.1 Specifically, did the Utility consider offering its residential ratepayers capable of demonstrating COVID-19-related income disruptions bill credits like BC Hydro has?
    - 1.2.1.1 If so, please explain on the record why the Utility chose not to proceed with this form of relief.
    - 1.2.1.2 If not, please explain on the record why the Utility chose not to consider this form of relief.
  - 1.2.2 Did the Utility consider offering the residential ratepayers capable of demonstrating COVID-19-related income disruptions lower bills (via lower energy rates or discounted basic charges)?
    - 1.2.2.1 If so, please explain on the record why the Utility chose not to proceed with this form of relief.
    - 1.2.2.2 If not, please explain on the record why the Utility chose not to consider this form of relief.
  - 1.2.3 Did the Utility consider offering its residential ratepayers capable of demonstrating COVID-19-related income disruptions any other form of economic relief aside from that included in the Application?
    - 1.2.3.1 If so, please describe those forms of relief discussed and why the utility chose not to proceed with this form of relief.

1.2.3.2 If not, please describe why PNG chose not to examine the economic relief measures being offered across the world by utilities to their ratepayers during this unprecedented time.

**2.0 Reference: Exhibit B-2, BCUC IR 1.2.1.1**

2.1 Can PNG confirm on the record whether it has considered scenarios where the COVID-19 economic crisis continues well past June 30, 2020?

2.1.1 If not, can the Utility explain why not?

2.1.2 If so, please provide the details of those scenarios and the results of PNG's considerations of each scenario.

2.2 Can PNG confirm that it will not offer bill deferrals for customer costs incurred after June 30, 2020 – the end date specified in this Application?

2.2.1 If PNG will seek to or consider offering bill deferrals to its qualifying residential ratepayers beyond June 30, 2020, please describe the conditions necessary for PNG to proceed on that basis.

**3.0 Reference: Exhibit B-2, BCUC IR 1.3.1 and 1.3.2**

3.1 Please provide a copy of the Residential and the Small Commercial online application forms.

**4.0 Reference: Exhibit B-2, BCUC IR 1.5.3**

4.1 Please provide the Weighted Average Cost of Debt (%) proposed and, for comparison, the Late Payment Fees that would otherwise be recovered on overdue balances.

**5.0 Reference: Exhibit B-2, BCUC IR 1.5.4**

5.1 Please provide the provisions for bad debt for PNG and PNG NE that are included in their proposed RRAs currently before the BCUC.

**6.0 Reference: Exhibit B-2, BCUC IR 1.5.5**

6.1 Please elaborate with respect to the criteria that PNG will use to determine whether bad debt incurred is (i) expected/forecast and therefore covered by the bad debt component embedded in O&M costs or (ii) attributable to COVID-19 and hence eligible for booking into the proposed deferral account that is the subject of this application.

6.2 Please confirm that there is no possibility of double counting any bad debt expenses and explain briefly how PNG has eliminated this possibility.

**7.0 Reference: Exhibit B-2, BCUC IR 1.5.9**

The referenced response states:

*PNG notes that following the World Health Organization declaration of a pandemic, PNG triggered its Incident Command System and activated the Emergency Operations Centre (EOC). The EOC team meets frequently and addresses all operational matters as a result of the COVID-19 working environment. During these meetings, the team has identified and discussed incremental and unplanned expenses and these are being tracked separately by the finance team. [Emphasis added.]*

7.1 Please provide any elaboration or specific information available with respect to the incremental and unplanned expenses that have been identified to date.

**8.0 Reference: Exhibit B-1**

8.1 Can PNG confirm that deferred amounts will be tracked and recovered on a Rate Schedule specific basis?