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November 12, 2020

British Columbia Utilities Commission
Suite 410, 900 Howe Street
Vancouver, British Columbia V6Z 2N3

Attention: Marija Tresoglavic, Acting Commission Secretary

Dear Ms. Tresoglavic:

**Re: Corix Utilities Inc.
British Columbia Utilities Commission Inquiry into the Regulation of Safety
Written Submission in Response to Exhibit A-1**

Corix Utilities Inc. (“**Corix**”) writes in response to Order G-241-20 issued by the British Columbia Utilities Commission (“**BCUC**”) on September 23, 2020, establishing an inquiry to review the BCUC’s jurisdiction relating to safety (“**Safety Inquiry**”).

About Corix

Corix is a wholly owned subsidiary of Corix Infrastructure Inc. (“**CII**”), which is a fully integrated provider of utility infrastructure solutions throughout North America that include energy, water, and wastewater projects. CII develops, finances, constructs, operates, and maintains a range of multiutility infrastructure for its customers pursuant to a variety of delivery and governance models. CII and its subsidiaries are responsible for the operation and maintenance of over 25 in-service energy systems, ranging in size, scope and technology from large-scale combined heat and power and chilled water plants to low temperature geo-exchange based systems. Within British Columbia, the BCUC regulates electric, gas distribution and thermal energy utilities owned and operated by Corix and its wholly owned subsidiary Corix Multi-Utility Services Inc. (“**CMUS**”).

Corix’s Energy Utilities regulated by the BCUC

A. Electric Utilities

1. Sonoma Pines Electric in Kelowna; and
2. Sun Rivers Electric in Kamloops.

B. Natural Gas and Propane Utilities

3. Sonoma Pines Gas in Kelowna; and
4. Sun Rivers Gas in Kamloops.
5. The Propane utility at the Panorama Mountain Resort community (“**Panorama Propane**”).

C. Thermal Energy Systems

6. Docksider Green Energy Utility (“DGE”) in Victoria;
7. Burnaby Mountain District Energy Utility (“BMDEU”) in Burnaby;
8. Neighbourhood District Energy System (“NDES”) at the University of British Columbia (“UBC”) in Vancouver; and
9. Talasa Village District Energy Utility (“TVDEU”), which is comprised of the Belmonte and Talasa systems in the Sun Rivers community in Kamloops.

The BCUC regulates DGE, BMDEU, and the UBC NDES as Stream B utilities under the BCUC’s Thermal Energy Systems Regulatory Framework Guidelines (“TES Guidelines”).¹ The BCUC regulates the TVDEU systems as Stream A utilities under the TES Guidelines.

Comments on the Safety Inquiry

Corix appreciates the initiative taken by the BCUC to launch this Safety Inquiry. Corix and CMUS are active in British Columbia’s utility sector and therefore have a material interest in the outcome of this Safety Inquiry. In particular, Corix is interested in obtaining clarity regarding the BCUC’s jurisdiction for the regulation of safety with respect to:

- utility customers;
- the utility, its employees and its assets; and
- members of the general public that are not customers of the utility.

Corix does not have specific comments on questions 1, 2 and 3 on page 5 of Appendix B to Order G-241-20 as these questions are questions that Corix also seeks clarity on. As such, Corix is looking forward to the outcome of this Safety Inquiry.

In response to question 4, Corix considers that a BCUC-led workshop in the early stages of the Safety Inquiry would be useful to provide all participants with a base understanding of the topics being explored in this inquiry. It would be particularly useful if the workshop included a presentation by the BCUC that includes, but is not limited to, the following.

1. Explanations of the current regulatory jurisdictions and any potential overlap regarding the safety of energy utility customers, energy utility employees and the general public of:
 - a) BCUC;
 - b) BC Oil and Gas Commission;
 - c) Technical Safety BC;
 - d) WorkSafe BC;
 - e) Municipally-owned Utilities; and
 - f) Indigenous Utilities.

¹ Appendix A to BCUC Order G-27-15, dated March 2, 2015.

2. A discussion referencing all key Government Directions, Special Directions and Regulations, BCUC Orders and Decisions or other documents that impact or work to define the jurisdiction of utility safety regulation in British Columbia.
3. A discussion of the possible actions that the BCUC anticipates performing following the completion of this Safety Inquiry. For example, does the BCUC anticipate the development of a guideline to address its regulation of safety pursuant to the *Utilities Commission Act*, or perhaps the issuance of a report to the Government seeking an update to relevant legislation to increase clarity surrounding jurisdiction?
4. A discussion of the anticipated regulatory process for the inquiry, including a regulatory timetable. A regulatory timetable outlining the inquiry process and deadlines allows interveners to plan their resource requirements in advance, given other projects and regulatory filings that may be occurring simultaneously.

Corix considers that a BCUC-led workshop that includes, but is not limited to, the information above will provide additional context for this proceeding and the relevant background and historical knowledge that can be useful in the development of interveners' submissions on the topics in scope.

All of which is respectfully submitted,

Corix Utilities Inc.

Per:

A handwritten signature in black ink, appearing to read 'Errol South', followed by a long horizontal line extending to the right.

Errol South
Senior Regulatory & Financial Analyst, Corix Utilities Inc.