
Sent: Saturday, January 30, 2021 1:22 PM
To: Commission, Secretary
Subject: Request to Intervene - FEI CPCN for the Tilbury LNG Storage Expansion Project - BC Sustainable Energy Association

Date Submitted: January 30, 2021 13:22 PST

Proceeding name: FEI CPCN for the Tilbury LNG Storage Expansion Project

Participant contact information

Organization or individual name: BC Sustainable Energy Association

City: Victoria

Province: British Columbia

Email: thackney@shaw.ca

Phone number: 250-381-4463

For organizations only - representative contact information

Name: William Andrews

Organization (if different from above):

City: Guelph

Province: Ontario

Email: william.j.andrews01@gmail.com

Phone number: 6043130089

Also representing (if applicable):

Additional information

Please state your reasons for intervening in this proceeding:

BCSEA is a registered charity and a non-profit association of citizens, professionals and practitioners committed to promoting the understanding, development and adoption of sustainable energy, energy efficiency and energy conservation in British Columbia. BCSEA supports the province’s transition to a lower-carbon economy. BCSEA has four chapters across BC and approximately three hundred individual and organizational members. Many of BCSEA’s members are ratepayers of one or more of BC’s energy public utilities. BCSEA represents individuals and organizations in BC who care about energy sustainability and climate change mitigation, and who want the energy they purchase and use to be sustainably produced and transported.

Please state how you are directly or sufficiently affected by the Commission's decision in this matter; or describe your experience, information, or expertise relevant to this matter that would contribute to the Commission's decision making:

BCSEA’s interest in this proceeding is as a non-profit public interest energy policy organization and as representatives of its members’ interests as ratepayers of FortisBC Energy Inc. BCSEA will provide experience and expertise to the proceeding. BCSEA participated in the Commission’s 2017 proceeding regarding FEI’s Long Term Gas Resource Plan, and its 2010 proceeding regarding the Long Term Gas Resource Plan filed by FEI’s corporate predecessor the Terasen Energy Utilities. BCSEA has participated in FEI’s annual reviews under the 2014-2018 performance-based rates plan and the subsequent multi-year rates plan. BCSEA also participates in FEI’s 2022 Long Term Gas Resource Plan Advisory Group.

Please list the key issues you intend to address in the proceeding:

BCSEA is resistant to new investment in natural gas infrastructure in the absence of solid justification, because of the risk of locking-in fossil-fuel gas infrastructure and inhibiting the reduction of GHG emissions. The issues BCSEA intends to address in the proceeding include: • Project purpose: “system resilience” or LNG sales? • Project need: how much “system resilience” is required, how much would be provided by the Project? • Project alternatives: other ways to achieve “system resilience” • Project cost: why so expensive? What about cost overruns? • Project cost effectiveness: Is the gain in “system resilience” worth the cost to ratepayers? • other issues that may arise.

For administrative purposes only

Do you intend to participate fully, including attendance at hearings and submission of evidence or information requests, if applicable?: Yes

Do you intend to request PACA funding? This does not impact your ability to participate: Yes

Have you or your organization web-registered as an intervener or interested party in the past 12 months?: Yes