OWEN·BIRD
LAW CORPORATION

PO Box 49130
Three Bentall Centre
2900-595 Burrard Street
Vancouver, BC
Canada V7X 1J5

Telephone 604 688-0401
Fax 604 688-2827
Website www.owenbird.com

February 11, 2021

VIA ELECTRONIC MAIL

British Columbia Utilities Commission
6th Floor, 900 Howe Street
Vancouver, B.C. V6Z 2N3

Direct Line: 604 691-7557
Direct Fax: 604 632-4482
E-mail: cweafer@owenbird.com
Our File: 23841/0249

Attention: Marija Tresoglavic, Acting Commission Secretary

Dear Sirs/Mesdames:

Re: FortisBC Energy Inc. - Application for A Certificate of Public Convenience and Necessity for the Okanagan Capacity Upgrade Project ~ Project No. 1599152

We are counsel to the Commercial Energy Consumers Association of British Columbia (the "CEC"). Attached please find the CEC's first set of Information Requests with respect to the above-noted matter.

If you have any questions regarding the foregoing, please do not hesitate to contact the undersigned.

Yours truly,

OWEN BIRD LAW CORPORATION

Christopher P. Weafer

CPW/jj
cc: CEC
cc: FortisBC Energy Inc.
cc: Registered Interveners

COMMERCIAL ENERGY CONSUMERS ASSOCIATION OF BRITISH COLUMBIA ("CEC")

INTERVENER INFORMATION REQUEST NO. 1

FortisBC Energy Inc. ("FEI") Application for A Certificate of Public Convenience and Necessity ("CPCN") for the Okanagan Capacity Upgrade Project No. 1599152

February 11, 2021

---

1. Reference: Exhibit B-1-2, pages 2 and 3 and Appendix D

Request for Confidential Treatment of Certain Appendices

To support the Application, FEI has filed several Appendices, with the following ones being filed confidentially in accordance with the BCUC's Rules of Practice and Procedure, as set out in Order G-15-19.

- Appendix A – Solaris FEED Report Documents
- Appendix B – Construction Cost Estimate (FEI)
- Appendix C - Risk Analysis Reports
- Appendix E – Financial Schedules
- Appendix H-14 – OCU Land Acquisition Plan
- Appendix H-18 - Status of Private Landowner Property Acquisition
- Appendix I-5 – OIB Consultation Response

FEI respectfully requests that the BCUC hold the above listed documents confidential, and believes that such information should remain confidential even after the regulatory process for this Application is completed. Below, FEI will outline the reasons for keeping the information confidential.

Appendix D

Appendix D includes cost estimates, containing capital cost estimates for the Project. They should be kept confidential on the basis that FEI may be going to the market to seek competitive bids for the materials and construction work for the Project. If the estimated costs for the material and construction work are disclosed, FEI reasonably expects that its negotiating position may be prejudiced. For instance, the bidding parties with knowledge about the estimated costs may use the estimate costs as a reference for their bidding.

Appendix D
DETAILED SCHEDULE

1.1 Appendix D, Detailed Schedule is included in the Public documents and does not contain capital cost estimates. Please confirm that FEI does not intend to keep Appendix D confidential.

1.2 Please confirm that FEI intended to reference Appendix E, E-1, and E-2 as including costs estimates and requiring confidential treatment.

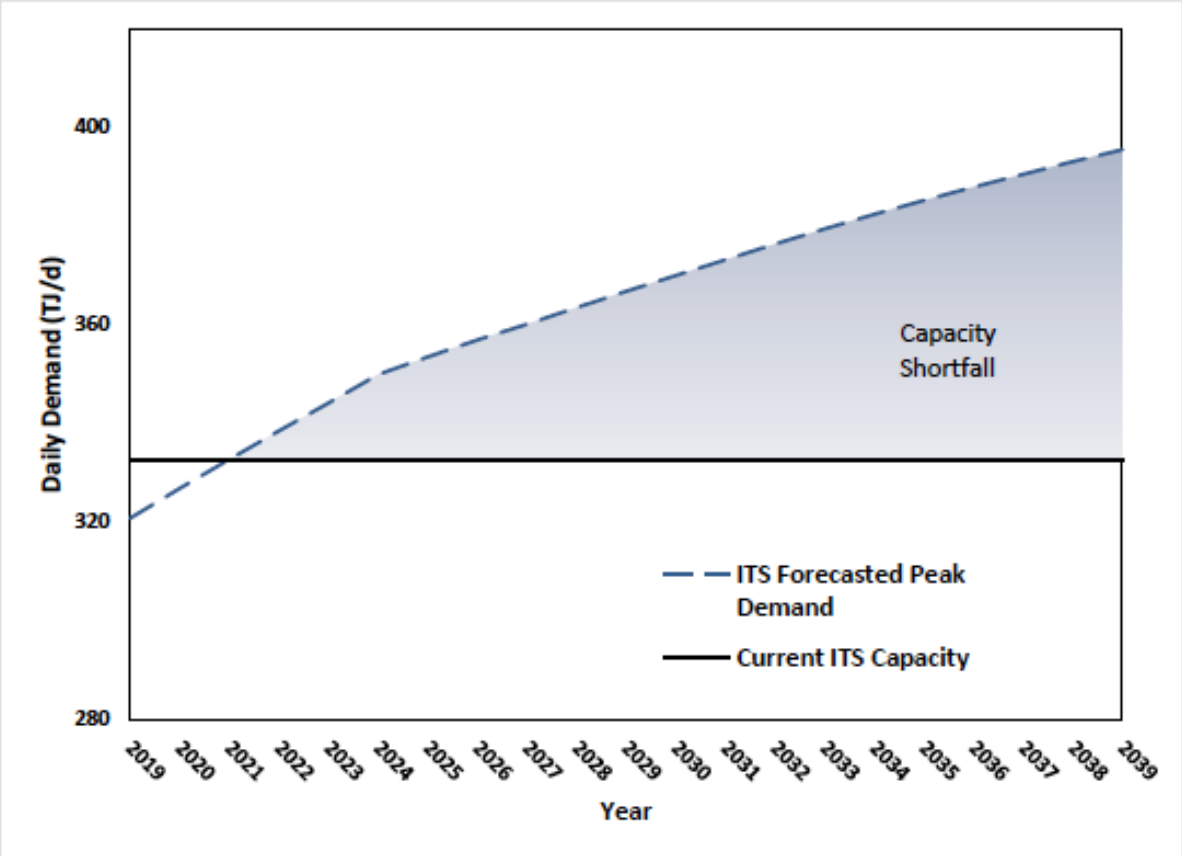
2. Reference: Exhibit B-1-2, pages 18 - 20 and page 29

Figure 3-7 below illustrates the current capacity limit of the ITS under peak cold winter conditions versus the forecast increase in demand across the whole ITS (as shown previously in Figure 3-6), with the capacity shortfall shown as the shaded region under the demand curve. Note that the forecast demand curve meets the current ITS capacity line in 2021, suggesting that the ITS will reach its capacity limit in the winter of 2021/2022. However, FEI's system capacity planning group has identified short-term mitigation measures that can be used through the winter of 2021/2022 and 2022/23, if required, to manage the peak load within the available

[10] System design temperature is determined for each region by calculating the coldest day which is statistically likely to occur once in a 20-year period. FEI's system is designed to meet the peak demand which would occur during this extreme cold weather event. The statistical 20-year low is calculated using information from local weather stations, and is updated as weather trends change.

system capacity while FEI implements a practical long-term solution. These short-term mitigation measures are described further in Section 4.2 of the Application.

Figure 3-7: ITS Peak Demand vs. Capacity



The need to address a future capacity shortfall in the Okanagan area was previously identified in FEI's December 14, 2017 Long Term Gas Resource Plan (LTGRP) filing:[15]

2.1 Please state when FEI first became aware of the expected capacity shortfall.

2.2 Why did FEI wait until November 2020 to make an application for the proposed upgrade when the capacity shortfall is expected to occur in 2021?

2.2.1 Would FEI have been able to undertake different options if it had addressed the issue earlier? Please explain.

2.2.1.1 If yes, what other options could FEI have introduced, and at approximately what cost?

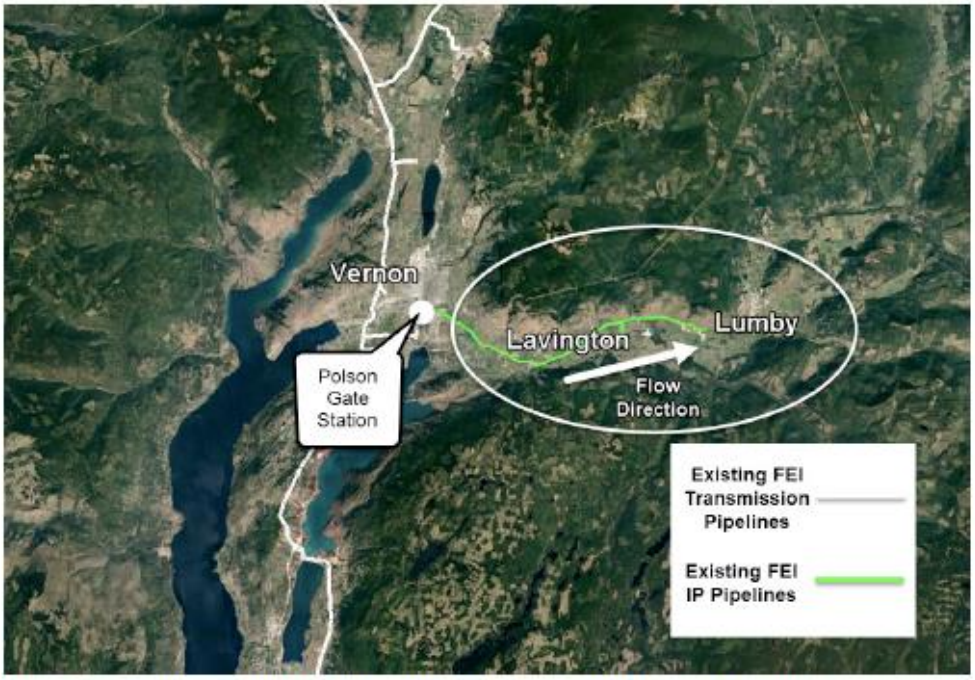
2.3 To what extent could FEI utilize capacity-related DSM measures to defer the increase? Please identify the types of measures and the potential impacts that might have been employed.

3. Reference: Exhibit B-1-2, page 27

Figure 3-9: West Kelowna and Peachland

Source: Google Earth overlaid with FEI transmission pipeline location data (10/5/2020)

Figure 3-10: Lavington and Lumby



Source: Google Earth overlaid with FEI transmission pipeline location data (10/5/2020)

3.1 Could FEI undertake capacity-related DSM measures specifically targeted at those communities likely to experience a capacity shortfall? Please explain why or why not.

3.1.1 If yes, to what extent has FEI considered this option?

4. Reference: Exhibit B-1-2, pages 26 and 28

3.3.1 Capacity Shortfall Will Negatively Impact Residential and Commercial Customers

FEI's customer profile in this region has evolved over time such that it has fewer large interruptible industrial customers like pulp mills that can be quickly curtailed in a supply emergency. This means that the necessary curtailment volumes to make a meaningful difference in load have to be obtained from a larger pool of smaller non-interruptible or firm customers. Consequently, any capacity shortfall would predominantly impact residential, commercial (e.g. restaurants and shopping malls), and institutional customers (e.g. schools, hospitals, and community centres).

The first regions to experience a capacity shortfall would be the communities of West Kelowna, Lavington, and Lumby (shown in Figures 3-8 and 3-9 above). The systems in these

4.1 Please identify any interruptible schedules that are available for commercial ratepayers.

4.1.1 Has FEI considered introducing more interruptible schedules for non-industrial ratepayers? Please explain.

5. Reference: Exhibit B-1-2, pages 28 and 29

3.3.2 The Project is Necessary Despite Uncertainty in COVID-19 Impacts

FEI's peak demand forecast was prepared in 2019, before the onset of the COVID-19 pandemic. As of the date of filing, there is insufficient data to quantify the COVID-19 impact, to forecast its future impacts on energy consumption or, more importantly for system planning, its impact on peak loads. FEI acknowledges that the immediate and near-term impacts of the pandemic may be significant for some types of customers and economic sectors. However, FEI presently has insufficient information to quantify these impacts. Furthermore, there is no firm evidence to confirm that any decreases in overall gas demand will be long lasting. Due to this inability to predict what the lasting impacts may be, FEI does not believe that the execution of this critical system capacity addition project should be deferred due to the COVID-19 pandemic.

In the near term, COVID-19 may result in commercial loads declining due to business closures (in compliance with public health orders or resulting from general economic conditions). However, there are also some factors that may mitigate the economic impacts of COVID-19 as they relate to peak load forecasting. For example, FEI expects there to be some offsetting increase in residential heating loads, due to individuals working from home or spending more time at home. Further, some impacts will be temporary and may be resolved quickly, but FEI cannot forecast the timing and magnitude of full recovery. At this time, FEI has no information available to quantify the impact on other customer classes or economic sectors.

FEI noted above a number of possible factors that could act to increase load above the load forecast presented above, including expanding greenhouse operations, winery operations and new CNG fuelling stations, along with other industrial customers. Since the occurrence of COVID-19, FEI continues to receive inquiries and requests for preliminary planning for several projects. FEI cannot conclude that COVID-19 will result in the deferral or cancellation of these potential additional loads.

In summary, given the lack of firm information on COVID-19 related impacts on the peak load in 2023/2024 and future years, the continuing potential for significant new loads in urban centres like Kelowna, the limitations of existing short-term mitigation measures, and the lead time required for a project of this nature, FEI concludes that it would not be prudent to delay the addition of ITS capacity and that the OCU Project should proceed as set out in this Application.

5.1 Please confirm that the peak demand load forecast is based on the best available information.

5.2 Please confirm or otherwise explain that the peak demand load forecast being relied upon in this application has been approved by the Commission, and please identify in what proceeding this peak demand load forecast was approved.

5.3 Please provide quantification of the impact of COVID-19 on FEI's load relative to its 2020 load forecast and January 2021 load forecast.

5.4 Please describe what additional drivers could potentially cause increases or decreases in the load above or below the peak demand load forecast.

5.5 Please describe the economic or other drivers that would potentially cause increases in the load above the peak demand load forecast.

5.5.1 Why has FEI not already included these factors in the peak demand load forecast?

6. Reference: Exhibit B-1-2, page 29

3.4 *ITS Delivery Capacity Must be Increased to Meet Forecast Demand*

FEI is committed to providing reliable service to its customers. As such, the inability to reliably serve customers due to a shortage of capacity on the ITS during an expected 1 in 20 year weather event is considered unacceptable.

FEI must also maintain adequate system capacity such that customer additions can be accommodated. Section 28 of the UCA states that a utility must provide service upon request, should the supply line be near the property requesting service.[12] Without an increase in ITS capacity, FEI will be unable to satisfy future growth in gas demand caused by new customer additions.

6.1 When considering the potential for a '1 in 20 year' weather event to occur, how does FEI account for the possibility of climate change to vary the weather from that included in historical data? Please explain.

7. Reference: Exhibit B-1-2, page 30

3.5 *Conclusion*

The population and consequent development in the Okanagan region has grown since the ITS was initially constructed in the 1950s. Over time, upgrades to the system have been undertaken to maintain reliable gas supply to the surrounding communities. The most recent major upgrade was in 2000, and since then, the population has increased significantly in the major centres of Vernon, Kelowna and Penticton. FEI's recent forecasts indicate that this increase in population and the increase in gas use by all types of customers will lead to a shortfall in ITS capacity by the 2023/2024 winter peak demand period. If this situation is not addressed, capacity shortfalls and the resulting curtailment of customers will become increasingly likely and widespread.

FEI examined several alternatives to address this situation. The solution proposed in the Application to increase the delivery capacity of ITS is the appropriate response to meet the peak demand requirements in the central and north Okanagan regions, and to ensure that FEI maintains long-term safe and reliable gas service to meet customers' expectations.

7.1 Please provide the historical and forecast population growth for the region dating back ten years and ten years into the future.

7.2 Please provide FEI's customer account history (number of accounts) for the last 10 years by rate class.

7.2.1 Please provide FEI's customer account forecast for the next 5 years to the extent it is available.

7.3 Please provide the Use Per Customer by rate class for residential and commercial customers over the last 10 years.

7.3.1 Please provide FEI's Use Per Customer forecast for the next 5 years to the extent it is available.

8. Reference: Exhibit B-1-2, page 32

---

4. DESCRIPTION AND EVALUATION OF ALTERNATIVES

4.1 *INTRODUCTION*

As outlined in Section 3, FEI is forecasting load growth in the Okanagan region, which will result in insufficient pressures in portions of the ITS unless a system upgrade is installed. The first impact expected will be the loss of sufficient winter inlet pressures to the Kelowna #1 Gate Station and the Polson Gate Station, which may occur as early as the winter of 2021/2022. With the reduction in inlet pressure, FEI would lose the capability to deliver gas to customers in portions of the Okanagan on winter days that approach system design conditions. The OCU Project therefore has the following project objectives:

1. Increase the delivery capacity of the ITS to meet peak demand requirements and to maintain safe and reliable gas service to FEI customers in the central and north Okanagan regions; and
2. Ensure all construction related activities are completed in time for the winter of 2023/2024 to avoid service interruptions to customers.

As explained in the following section, FEI has determined that short-term mitigation measures may be required to maintain sufficient capacity for the winters of 2021/2022 and 2022/2023. However, these interim measures are not viable to support projected demand in 2023/2024, and a longer-term solution must be implemented prior to this point.

8.1 Please provide a breakdown of those customers that could be affected by an inability of FEI to deliver gas on winter days approaching design conditions as early as 2021/2022. Please breakdown by rate class of the number of customers and annual energy consumed.

9. Reference: Exhibit B-1-2, page 33

4.1.1 Short-Term Mitigation Measures are Possible to Maintain Capacity for Winters of 2021/2022 and 2022/2023

All alternatives rely on the implementation of short-term mitigation measures to address the possibility of a capacity shortfall during the winters of 2021/2022 and 2022/2023.

Short-term mitigation measures include options such as maximizing the utilization of the currently available capacity within the system by temporarily allowing lower station inlet pressures where existing stations are capable; increased pressure monitoring; minor station upgrades; and CNG injection to offset peak demand where feasible.

While these measures are adequate to provide some capacity safety margin in the winter of 2021/2022 and 2022/2023, they do not represent a viable long-term solution, and do not provide FEI with sufficient and reliable system capacity starting from the winter of 2023/2024. Local measures such as operating stations at lowered inlet pressures provide limited benefit to the system outside their immediate area and do not address the continued decline in system pressures that a pipeline upgrade would address. While CNG injection could also mitigate short-term capacity needs in the region, this is not a viable long-term solution as the volumes of CNG required to meet growing demand continue to increase each year with additional load growth, and due to the significant cost to implement, operate and maintain a CNG supply. More importantly, CNG injection is a far less reliable method to transport gas through B.C.'s Interior than a pipeline, due to reliance on a fleet of CNG trucks, which would need to operate on rural highways in adverse weather conditions.

9.1 Please elaborate on the temporary allowance of lower station inlet pressures.

9.1.1 What is the impact of this option on other customers?

9.1.2 Why can this only be a temporary measure?

9.2 Please describe the increased pressure monitoring and how that assists.

9.3 What minor station upgrades would be required? Please explain and elaborate on what they would contribute to mitigating the issue.

9.4 Please elaborate on the CNG injection option. Would that be used in conjunction with the other mitigating options, or independently?

9.4.1 Could use of significantly increased CNG independently resolve the issue? If so, for how long?

10. Reference: Exhibit B-1-2, pages 33, 42 and 45

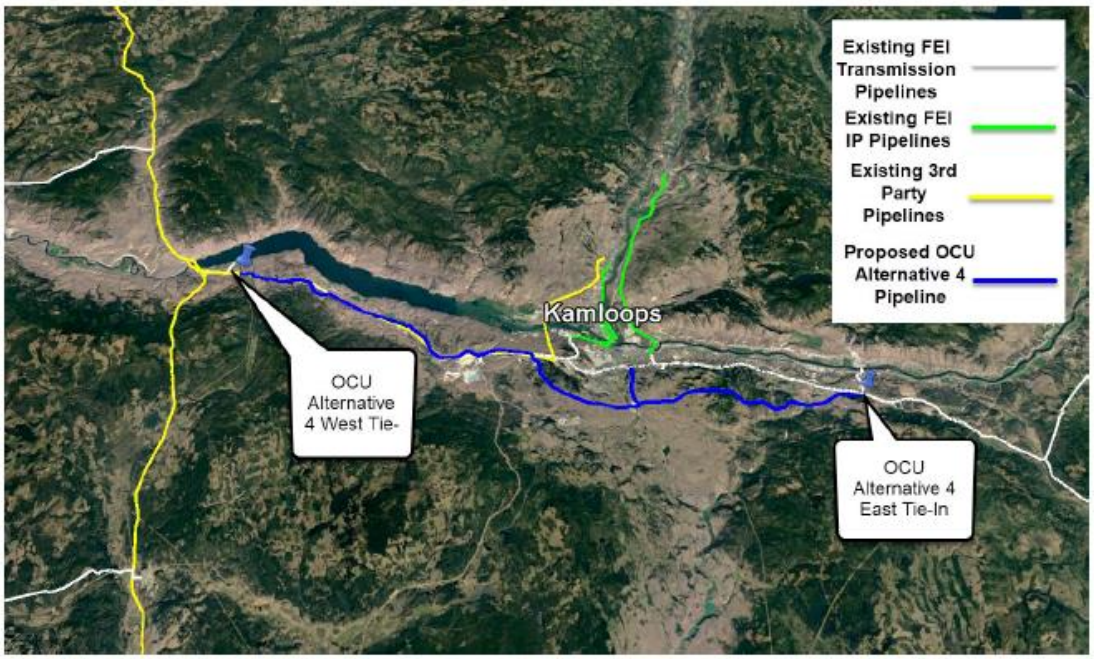
FEI conducted a comprehensive evaluation of these five alternatives and concluded that Alternatives 4 and 5 do not meet the primary project objectives and are not feasible to implement within the timeframe required to meet capacity requirements. These alternatives were therefore screened out early in the project development phase. The remaining three feasible alternatives (Alternatives 1 through 3) were further analyzed and evaluated using the evaluation criteria specified in Section 4.4.1. These criteria include improving operational flexibility, minimizing impact to the environment and the public, as well as financial criteria.

4.2.4 Alternative 4 – 508 mm Loop from Savona

The fourth alternative to address the capacity constraint involves the installation of a 508 mm loop starting at the Savona Compressor Station and running eastward for approximately 68.4 km before terminating east of Kamloops.

This pipeline looping would increase gas supply delivered via the Enbridge pipeline at Savona. This alternative would also require an upgrade to the 4.1 km 114 mm Coldstream lateral in Vernon to a 168 mm pipeline. Figure 4-5 below provides an overview of Alternative 4.

Figure 4-5: Overview Map of Alternative 4



Source: Google Earth overlaid with FEI Transmission Pipeline Data (Image taken 10/5/2020)

The new pipeline would be designed such that it could be operated at a MOP of 6,619 kPa to match the outlet pressure of the Savona Compressor Station.

Only the first 52.4 km of this loop would be required to be in-service by winter of 2022/2023 to avoid the forecast shortfall. However, the preliminary route chosen for this loop bypasses the City of Kamloops which does not allow for a tie-in to the existing ITS at the 52.4 km mark. Therefore the entire loop would need to be built before it could be tied into the existing system.

(EA)[15]. The anticipated timeline for completion of an EA is three years. Due to this delay, it is highly unlikely that construction of this pipeline could begin prior to 2024. Pipeline installation is likely to take approximately three years due to the length and complexity of this pipeline route, indicating a completion date of 2027 or later. A capacity shortfall which requires significant, lasting mitigation is expected to occur in the winter of 2023/2024; this shortfall will increase each year during the EA and construction phases, as demand on the ITS continues to grow. As discussed in Section 4.1.1, measures such as CNG injection, which can be used to mitigate a small, short-term capacity shortfall such as the shortfall projected for 2021/2022 and 2022/2023, are costly and inefficient in the long term when compared to standard gas supply methods such as pipelines. Relying on such measures to mitigate a large and extended capacity shortfall, such as the one which would occur during implementation of Alternative 4, represents an unacceptable level of risk for FEI's customers. For this reason, FEI does not consider Alternative 4 to meet the primary project objectives as it does not mitigate the risk of capacity shortfall within an acceptable timeframe.

10.1 Is it fair to say that FEI screened out Alternative 4 primarily because it could not be built in the timeframes required for the winter of 2022/2023?

10.2 At what point would FEI have needed to conduct its initial analysis to have permitted Alternative 4 to be a viable option?

10.2.1 Why was this not undertaken?

10.2.1.1 Did the regulatory regime influence FEI's decision-making with respect to capital spending with respect to this project in any way whatsoever? Please explain.

10.3 Recognizing that FEI conducted a 'comprehensive evaluation' before screening out Alternatives 4 and 5, please provide a general statement of the benefits of Alternative 4.

10.4 Please provide a general statement of the detriments of Alternative 4.

11. Reference: Exhibit B-1-2, pages 33, 43 and 45

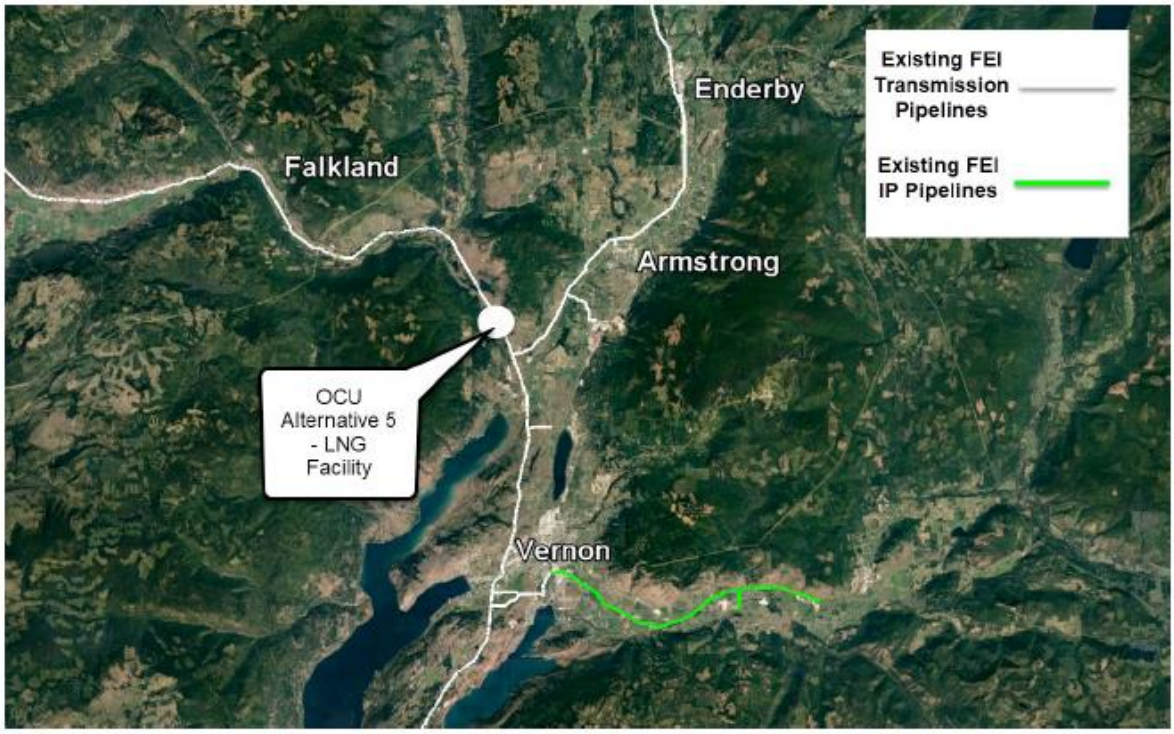
FEI conducted a comprehensive evaluation of these five alternatives and concluded that Alternatives 4 and 5 do not meet the primary project objectives and are not feasible to implement within the timeframe required to meet capacity requirements. These alternatives were therefore screened out early in the project development phase. The remaining three feasible alternatives (Alternatives 1 through 3) were further analyzed and evaluated using the evaluation criteria specified in Section 4.4.1. These criteria include improving operational flexibility, minimizing impact to the environment and the public, as well as financial criteria.

4.2.5 Alternative 5 – LNG Facility Near Vernon

The fifth alternative proposes setting up an LNG storage and peak shaving facility located between Westwold and Grandview Flats northwest of Vernon. Such facilities located closer to the load centre allow gas to be moved into storage in times of low gas demand when excess pipeline capacity is available, and provide on-system delivery during periods of high demand.

In addition to the LNG storage and peak shaving facility, this alternative would also require an upgrade to the 114 mm Coldstream Lateral similar in nature to Alternative 1 and Alternative 4. Figure 4-6 below shows the location of the proposed facility.

Figure 4-6: Overview Map of Alternative 5



Source: Google Earth overlaid with FEI Transmission Pipeline Data (Image taken 10/5/2020)

This alternative was based on the following facility capacity requirements:

- Storage capacity: 0.31 Bcf (8800 x 10^3 m3)
- Liquefaction capacity: 1.55 mmscfd (44 x 10^3 m^3/d)
- Vaporization capacity: 51.44 mmscfd (1450 x 10^3 m^3/d)

This option would be required to be in service prior to the winter of 2023/2024 to avoid a capacity shortfall.

4.3.2.2 Alternative 5 Discussion and Analysis

Alternative 5 would meet the capacity objective for this project. However, preliminary research indicates that this alternative would be significantly too complex to design and construct prior to the winter of 2023/2024. An estimated minimum of five years is required to design and execute construction of such a facility following CPCN approval, pushing the completion date to 2027, or likely later. As detailed in the discussion of Alternative 4, this represents an unacceptable level of risk to FEI and does not meet the project objective to reliably meet demand on the ITS by the winter of 2023/2024. Therefore, it was rejected in the early development phase of the project.

11.1 Is it fair to say that FEI screened out Alternative 5 primarily because it could not be built in the timeframes required for the winter of 2022/2023?

11.2 At what point would FEI have needed to conduct its initial analysis to have permitted Alternative 5 to be a viable option?

11.2.1 Why was this not undertaken?

11.3 Recognizing that FEI conducted a 'comprehensive evaluation' before screening out Alternatives 4 and 5, please provide a general statement of the benefits of Alternative 5.

11.4 Please provide a general statement of the detriments of Alternative 5.

11.5 Please explain whether or not FEI could have a mobile option for LNG injection for any part of its system at any point in time required and, if so, why it does not?

12. Reference: Exhibit B-1-2, pages 45 and 46

4.3.2.3 Alternatives 4 & 5 Capital Costs are Expected to be Significantly Higher as Compared to All Other Alternatives

As shown in Table 4-1 below, preliminary high level cost estimates[16] for Alternatives 4 and 5 are significantly higher as compared to other alternatives. Because neither alternative met the schedule requirements of the project, FEI did not believe that producing more detailed estimates for these alternatives would be a prudent use of funds. Instead, these two alternatives were screened out, while Alternatives 1, 2, and 3 were investigated in more detail to select a preferred alternative.

Table 4-1: Preliminary Cost Estimates of All Alternatives

Alternative	Description	Total Pipe Installed (km)	Capital Cost Estimate Range (2019$ millions)
1	ITS Upgrades to VER PEN 323	15	40 – 100
2	Modified ITS Upgrades to VER PEN 323	19	50 – 130

Alternative	Description	Total Pipe Installed (km)	Capital Cost Estimate Range (2019$ millions)
3	OLI PEN 406 Extension	30	100 – 250
4	508 mm Loop from Savona	54	200 – 500
5	LNG Facility Near Vernon	n/a	250 - 600

4.3.3 Conclusion: Screening of Alternatives

As discussed above, FEI's alternatives screening process concluded that Alternative 4: 508 mm North Loop from Savona and Alternative 5: LNG Peak Shaving Facility near Vernon could not be completed in time to address capacity shortfalls forecast for 2023/2024, and therefore do not meet the primary objectives of the project. Preliminary high level cost estimates also indicated that both Alternative 4 and Alternative 5 would be significantly more costly as compared to other alternatives considered for the Project. As these two alternatives would not achieve the OCU Project objective to eliminate the capacity shortfall in Okanagan region by winter of 2023/24, they were deemed not feasible and were not considered further in the evaluation process. Alternatives 1, 2, and 3 do meet the primary project objectives, and were therefore evaluated in more detail as discussed below.

12.1 When did FEI make the decision to screen out Alternatives 4 and 5?

12.2 What level of AACE cost estimate do the above cost estimates represent?

12.2.1 Please provide a table of the level of project definition, end usage, methodology, expected accuracy range and preparation effort for each of the AACE class estimates.

13. Reference: Exhibit B-1-2, pages 46 and 48

4.4.1 Evaluation Criteria

Evaluation criteria were grouped into three primary categories:

- Asset Management Capability;
- Project Execution and Lifecycle Operation; and
- Financial.

These categories, and the evaluation criteria within them, are listed and defined below.

Weightings were assigned to the overall categories of evaluation criteria as shown in Table 4-3. Asset Management Capability was weighted the most heavily to reflect the importance of meeting FEI's overall technical objectives. Weighting was split evenly between the other two categories. Both are considered important as they measure various types of impact to the communities affected by the OCU Project. Weightings were also assigned to the criteria within each category, also as summarized in Table 4-3.

Table 4-3: Evaluation Criteria Weighting

Evaluation Criteria - Category	Weight (Overall)	Evaluation Criteria - Specific	Weight (Within Category)
Asset Management Capability	40%	System Capacity Increase	50%
		Operational Flexibility	50%
Project Execution and Lifecycle Operation	30%	Environmental, Public, and Indigenous Impacts	45%
		Schedule Risk	55%
Financial	30%	Rate Impact	100%

13.1 Are these Evaluation Criteria the identical or very similar to the Evaluation Criteria that FEI uses in other CPCNs?

13.1.1 If not, why not?

13.1.2 If not, what other criteria may be considered that was not considered in this instance, or what criteria was included that might not be otherwise? Please explain.

13.2 Please provide details as to how FEI determined the Evaluation Criteria.

13.3 Are these Weightings identical or very similar to the Weightings that FEI uses in other CPCNs?

13.3.1 If not, why not?

13.3.1.1 If not, what other Weightings may be considered that was not considered in this instance? Please explain.

13.4 Please provide details as to how FEI determined the appropriate Weightings.

14. Reference: Exhibit B-1-2, page 49

FEI applied a scoring methodology to evaluate all three feasible alternatives. The score assigned for each alternative was based on information provided by SMCI, and validated by FEI internal subject matter experts. The components of the evaluation methodology are described in the subsections below.

14.1 Please confirm the CEC's understanding that SMCI did not provide the scoring.

14.2 Please identify who originally did the scoring.

14.3 Please provide the positions of the subject matter experts that validated the scoring.

15. Reference: Exhibit B-1-2, pages 45, 46 and 55

4.4.2.3 ***Alternatives 4 & 5 Capital Costs are Expected to be Significantly Higher as Compared to All Other Alternatives***

As shown in Table 4-2 below, preliminary high level cost estimates[18] for Alternatives 4 and 5 are significantly higher as compared to other alternatives. Because neither alternative met the schedule requirements of the project, FEI did not believe that producing more detailed estimates for these alternatives would be a prudent use of funds. Instead, these two alternatives were screened out, while Alternatives 1, 2, and 3 were investigated in more detail to select a preferred alternative.

Table 4-2: Preliminary Cost Estimates of All Alternatives

Alternative	Description	Total Pipe Installed (km)	Capital Cost Estimate Range (2019$ millions)
1	ITS Upgrades to VER PEN 323	15	40 – 100
2	Modified ITS Upgrades to VER PEN 323	19	50 – 130
3	OLI PEN 406 Extension	30	100 – 250
4	508 mm Loop from Savona	54	200 – 500
5	LNG Facility Near Vernon	n/a	250 - 600

Table 4-8: Capital, O&M, Property Taxes ($000s)

Particulars	Alternative 1	Alternative 2	Alternative 3
Capital Cost (2019$) (excl. AFUDC)	$195,113	$206,623	$188,149
Capital Cost As Spent (incl. AFUDC)	$220,215	$232,927	$212,906
In-Line Inspection Capital (2019$)	N/A	N/A	$828
Retirement / Removal Costs As Spent	$1,569	$692	Nil
Incremental Annual O&M (2019$)[22]	Nil	$9	$24
Incremental O&M - Integrity Digs (2019$)[23]	N/A	N/A	$140
Incremental Annual Property Taxes (2019$)	$6	$78	$337

15.1 Please explain why the Capital cost estimate in Alternative 1 increased from a maximum of $100 million in the initial analysis to $200 million in the final analysis.

15.2 Please explain why the Capital cost estimate in Alternative 2 increased from a maximum of $130 million in the initial analysis to $232 million in the final analysis.

16. Reference: Exhibit B-1-2, page 47

4.5.1.3 ***Financial***

The sole criterion within this category measures the financial impact of the project on FEI's customers. FEI considered the long term rate impact to FEI's non-bypass customers in order to financially compare all three feasible alternatives. This was completed by evaluating the present value of the incremental revenue requirement as well as the levelized delivery rate impact over the 70 year analysis period for each alternative based on the estimated capital cost and operating cost.

- **Rate Impact:** Ability for an alternative to be completed with the lowest possible rate impact. The alternative which minimizes the rate impact to FEI's customers will score the highest.

16.1 For each Alternative, please identify and provide quantification for any costs included in the Financial criterion that are related to managing the Project on a short timeline, or that could have been reduced by having a longer timeline for implementation (for instance, overtime costs, higher pricing for shorter delivery times etc.).

17. Reference: Exhibit B-1-2, page 46, 47 and 48

4.5.1 Evaluation Criteria

Evaluation criteria were grouped into three primary categories:

- Asset Management Capability;
- Project Execution and Lifecycle Operation; and
- Financial.

These categories, and the evaluation criteria within them, are listed and defined below.

4.5.1.1 *Asset Management Capability*

Criteria within this category measure the success of the alternative in achieving the technical goals of the project now and into the future. As this category assesses the efficacy of the solution in meeting the project objectives, FEI considers this category to be relatively more important, which is reflected in the weighting discussed below.

The factors evaluated within this category are as follows:

- **System Capacity Increase:** Ability of an alternative to increase capacity in the ITS such that supply can be maintained to the Okanagan region under peak demand conditions. Alternatives that provide the greatest capacity increase will score the highest. If two or more alternatives provide a similar capacity increase, the same score is assigned.
- **Operational Flexibility:** Ability of a project to provide FEI with greater operational flexibility to perform inspection and repair work on its system assets. Projects which extend the window during which FEI can complete such work on sections of the ITS will score the highest.

4.5.1.2 *Project Execution and Lifecycle Operation*

Criteria within this category measure risks to project completion, and the impact a project will have during construction and over its lifetime on the communities and environment it affects.

- **Schedule Risk:** Ability for an alternative to be completed on schedule, with few identified risks to achieve the scheduled in-service date. Alternatives which can be completed on time will score the highest. Other alternatives are scored lower.
- **Environmental, Public and Indigenous Impacts:** Ability of an alternative to minimize impacts to the environment, the public (i.e., residents, landowners, customers, local government) and Indigenous communities, both during construction and over the lifetime of the project. Alternatives which effectively mitigate environmental and public safety hazards and which reduce negative impacts on the public, Indigenous communities and other stakeholders during project execution will score the highest.

4.5.1.3 *Financial*

The sole criterion within this category measures the financial impact of the project on FEI's customers. FEI considered the long term rate impact to FEI's non-bypass customers in order to financially compare all three feasible alternatives. This was completed by evaluating the present value of the incremental revenue requirement as well as the levelized delivery rate impact over the 70 year analysis period for each alternative based on the estimated capital cost and operating cost.

- **Rate Impact:** Ability for an alternative to be completed with the lowest possible rate impact. The alternative which minimizes the rate impact to FEI's customers will score the highest.

Weightings were assigned to the overall categories of evaluation criteria as shown in Table 4-3. Asset Management Capability was weighted the most heavily to reflect the importance of meeting FEI's overall technical objectives. Weighting was split evenly between the other two categories. Both are considered important as they measure various types of impact to the communities affected by the OCU Project. Weightings were also assigned to the criteria within each category, also as summarized in Table 4-4.

Table 4-4: Evaluation Criteria Weighting

Evaluation Criteria - Category	Weight (Overall)	Evaluation Criteria - Specific	Weight (Within Category)
Asset Management Capability	40%	System Capacity Increase	50%
		Operational Flexibility	50%
Project Execution and Lifecycle Operation	30%	Environmental, Public, and Indigenous Impacts	45%
		Schedule Risk	55%
Financial	30%	Rate Impact	100%

17.1 The CEC notes that Schedule Risk accounts for 16.5% of the total assessment, and encompasses risk associated with meeting the scheduled in-service date. Would this risk have been mitigated if the project were undertaken sooner? Please explain why or why not.

17.2 Please identify any of the other Evaluation Criteria that reflect timing risk.

17.2.1 Would FEI have adjusted the weightings for the various alternatives considered if there were no timing issues in meeting the 2021-2024 winters? Please explain.

17.2.2 If schedule risk were not a factor in meeting the 2021-2024 winters, how would FEI have weighted Schedule Risk? Please explain.

17.2.2.1 Please identify any other evaluation criteria or weightings that FEI would have altered based on timing risk, and how they would have been changed.

18. Reference: Exhibit B-1-2, pages 48, 49 and 50

4.5.2 Scoring and Weighting

Each feasible alternative was scored against each of the evaluation criteria using a scale from 1 to 5. These scores are defined as shown in Table 4-3.

Table 4-3: Alternative Evaluation Scoring Definitions

Score	Impact Evaluation*
5	Best choice: very low risk, or; very high opportunity for positive impact
4	Good choice: low risk, or; high opportunity for positive impact
3	Acceptable choice: neutral or moderate risk, or; opportunity for medium positive impact
2	Poor choice: high risk, or; low opportunity for positive impact
1	Worst choice: very high risk, or; no opportunity for positive impact

**For evaluation criteria such as System Capacity Increase, which provides a net positive, extent of positive impact is ranked. For others such as Schedule Risk, in which FEI seeks to minimize negative impact to the public, the extremity of this negative impact is ranked.*

Construction of Alternative 1 will not have a positive impact on operational flexibility, as no additional sections of pipeline will be constructed. The system configuration will remain unchanged. A score of 2 was assigned to reflect this (worst choice, low positive impact).

4.6.1.3 *Alternative 2: Modified ITS Upgrades to VER PEN 323*

Alternative 2 provides a significant positive capacity impact, fully meeting system capacity requirements, and was therefore awarded a score of 5 for System Capacity Increase (best choice; very high positive impact).

Construction of Alternative 2 will have some positive impact on operational flexibility. The proposed 6 km of pipeline extension will allow a greater weather window in which the segment of the VER PEN 323 pipe running from Ellis Creek to the north tie-in point of the proposed 6 km extension can be shut in for inspection, emergency response, or repair. Therefore, a score of 3 (acceptable choice, medium positive impact) was assigned as the improvement to operational flexibility is limited to a small portion of the ITS.

4.6.1.4 *Alternative 3: OLI PEN 406 Extension*

Extension of the OLI PEN 406 pipeline further north by 30 km provides a significant positive capacity impact, fully meeting system capacity requirements, and was therefore assigned a score of 5 for System Capacity Increase (best choice; very high positive impact).

Construction of Alternative 3 will have a positive impact on operational flexibility. For a portion of the year, it will be possible to shut in sections of the VER PEN 323 line between Ellis Creek and the north tie-in point of the proposed 30 km pipeline extension for inspection, emergency response or repair. As this is a much longer segment of pipeline than the small section affected by Alternative 2, Alternative 3 received a score of 4 (good choice; high positive impact).

18.1 To the extent that the Impact Evaluation uses the term ‘or’ in identifying the rationale, FEI’s impact evaluation appears to equate ‘risk’ with ‘opportunity for positive impact’, please elaborate on why a risk is matched with apparently ‘doing more’ than what would be otherwise expected from the project (i.e. Alternative 1 is scored 2, or a ‘poor choice’ even though it does not appear to have any risk factors).

18.2 Why does the risk evaluation not allow for taking on some risk and getting higher value?

18.3 Operational Flexibility accounts for 20% of the overall weight, compared to 30% for Financial evaluation, and defines the Asset Management Capability differences between the Alternatives. Please provide quantification for the benefits derived from operational flexibility to support the rankings of 2, 3 and 4 for Alternatives 1, 2 and 3 respectively.

19. Reference: Exhibit B-1-2, page 51

Table 4-6: Project Execution and Lifecycle Operation Alternative Evaluation

Criterion	Weighting	Alternative 1: ITS Upgrades Score	Alternative 2: Modified ITS Upgrades Score	Alternative 3: OLI PEN 406 Extension Score
Schedule Risk	55%	1	1	3
Environmental, Public and Indigenous Impacts	45%	2	2	3
Weighted Total:*	**100%**	**1.45**	**1.45**	**3**

**Weighted total is calculated for each alternative by multiplying the score for each criterion with its associated weighting, and then summing these scores. The maximum possible weighted total is 5.*

As Alternatives 1 and 2 are similar in their overall strengths and weaknesses, they are discussed together below.

4.6.2.2 *Alternative 1 (ITS Upgrades) and Alternative 2 (Modified ITS Upgrades)*

The existing VER PEN 323 was installed in 1957 and was designed to operate at 6,619 kPa. At the time of installation, this pipeline was pressure tested to 110 percent of its design MOP (7,281 kPa), in accordance with the industry standard in 1957. Since its installation, the areas surrounding this pipeline have experienced population growth, changing the class location[19] and requiring the MOP to be reduced to 5,171 kPa to comply with the requirements of CSA Z662. As described in Sections 4.2.1 and 4.2.2 of this Application, Alternative 1 and Alternative 2 involve the replacement of certain pipeline segments to meet CSA Z662 Class location requirements. In addition, FEI has concluded that, to meet current industry best practices, the existing portions of the VER PEN 323 pipeline that are not replaced in Alternative 1 or Alternative 2 must be requalified by retesting. Retesting would be in accordance with CSA Z662:19 at a minimum of 1.25 times the desired MOP of 6,619 kPa (i.e., 8,274 kPa) prior to recommissioning the pipe at its original MOP of 6,619 kPa.

For Alternative 1 and Alternative 2, SMCI established the boundaries of test segments and the number of test segments required, the time it would take to complete a test, and the risks that are associated with the pressure testing process. Due to limitations on allowable elevation difference on a test section, thirty-three requalification tests would be required in addition to six tests for the replacement segments.

The completion of construction and testing required for Alternatives 1 and 2 is complicated by the fact that VER PEN 323 is a critical portion of the ITS and there are nine months of the year when it cannot be taken out of service. It can only be temporarily shut down between June 1 and September 1, leaving little time to carry out the required testing. Using multiple crews working simultaneously during the three month outage, all work required for either alternative

[19] The class location of a pipeline is related to the population density in the surrounding area. As population in an area increases, the class location can change, and a pipeline operator must take action to ensure the pipeline meets the requirements of the new class location. This can mean reducing MOP or modifying the pipeline.

can feasibly be performed in two three-month periods (i.e., two years) provided that all activities go ahead smoothly. However, FEI has significant concerns regarding its ability to successfully complete the requalification tests of the existing segments of the VER PEN 323 pipeline, as discussed below.

19.1 What options exist for FEI to mitigate the risks associated with the requalification tests? Please explain.

19.1.1 To what extent did FEI consider these options for mitigation in their risk assessments?

20. Reference: Exhibit B-1-2, page 54

The route chosen for Alternative 3 results in a comparatively lower impact on the public and the environment by paralleling existing infrastructure (the VER PEN 323 transmission pipeline and the FBC 73L transmission powerline) wherever possible. This routing reduces the necessity to clear a new right of way, thereby reducing the long-term visual impact to the public in Naramata and Penticton as well as the impact to the environment. FEI anticipates acquiring some new land rights should this alternative be selected. As discussed in detail in Section 8.2 of the Application, FEI is committed to negotiating fair agreements with all landowners along the route and will continue to engage with landowners post CPCN filing to acquire the requisite land rights. If FEI is unable to come to agreement with landowners, it does reserve the right to proceed with expropriation of the required land rights.

20.1 Please confirm that FEI accounted for the cost of acquiring land rights.

21. Reference: Exhibit B-1-2, pages 55 and 56

Table 4-7: PV of Incremental Annual Revenue Requirement and Rate Impact

	Alternative 1	Alternative 2	Alternative 3
PV of Annual Revenue Requirement $000s	$199,969	$213,780	$203,973
Levelized Rate Impact $/GJ	$0.057	$0.061	$0.059
Financial / Rate Impact	4	2	3

The following Table 4-8 summarizes the incremental capital costs, annual operating and maintenance and property tax costs for the three alternatives. For Alternative 3 the incremental integrity capital related to running crack detection tools for in line inspection and the resulting operating costs (i.e., the integrity digs) that occur on a once per seven-year cycle are also provided.

Table 4-8: Capital, O&M, Property Taxes ($000s)

Particulars	Alternative 1	Alternative 2	Alternative 3
Capital Cost (2019$) (excl. AFUDC)	$195,113	$206,623	$188,149
Capital Cost As Spent (incl. AFUDC)	$220,215	$232,927	$212,906
In-Line Inspection Capital (2019$)	N/A	N/A	$828
Retirement / Removal Costs As Spent	$1,569	$692	Nil
Incremental Annual O&M (2019$)[22]	Nil	$9	$24
Incremental O&M - Integrity Digs (2019$)[23]	N/A	N/A	$140
Incremental Annual Property Taxes (2019$)	$6	$78	$337

Although Alternative 3 has higher operating and maintenance (O&M) expense and Property Taxes[24], it has the lowest capital cost which result in lower costs for depreciation expense,

21.1 Please confirm or otherwise explain that the PV of the Incremental Revenue Requirement in Table 4-7 includes all the costs identified in Table 4-8.

22. Reference: Exhibit B-1-2, page 62

5.3.2.3 Weighting and Methodology

Each of the evaluation criterion was given a weighted score as outlined in Table 5-2, in order to quantify the relative merits of each option.

Table 5-2: Pipeline Route Evaluation Weighting[23]

Criteria	Weighting	Evaluation Considerations
Category 1: Community and Stakeholder Criteria Weighting		
Health and Safety	15	Assessment of the construction zone environment, nature of the planned construction activities and proximity to vulnerable entities.
Socio-Economic	15	Proximity to populated areas, roadway usage impacts, number of commercial accesses impacted, agricultural impacts, etc.
Land Ownership and Use	5	Properties directly impacted during construction and nature of impacts.
Sub-total:	***35***	
Category 2: Environmental Criteria Weighting		
Ecology	5	Natural and environmentally sensitive areas impacted.
Cultural Heritage	5	Culturally sensitive areas impacted.
Human Environment	15	Nature and proximity of visual, noise and vibration impacts, residential accesses impeded, etc.
Sub-total:	***25***	
Category 3: Technical Considerations Weighting		
Engineering	5	Areas of construction difficulty requiring engineering solutions identified.
Construction	10	Type of construction required, pipe installation productivity quantified, length of pipeline and overall construction footprint etc.
Operation	10	Areas of potential operational difficulty identified.
System Interface	5	Complexity of interface and length of pipeline laterals quantified.
Adjacent infrastructure	5	Type of adjacent infrastructure, proximity and spacing, planned infrastructure, using wider road allowance to maximize proximity, etc.
Natural Hazards	5	Preliminary evaluation of the surrounding natural and man-made environment and potential hazards along the route corridor.
Sub-total:	***40***	
Total	***100***	

22.1 Please explain how FEI determined the evaluation considerations.

22.1.1 Did FEI make the determinations internally, or were third parties involved in the decision-making?

22.2 Please explain how FEI determined the appropriate weights.

22.2.1 Did FEI make the determinations internally, or were third parties involved in deciding the weightings?

22.3 Did FEI include financial considerations in establishing the weightings?

22.3.1 If no, please explain why not.

22.3.2 If yes, please explain how the financial considerations were included, in what category, and what weight they were given.

23. Reference: Exhibit B-1-2, page 67

5.3.3 Final Route Development

The next and final stage of the routing process will involve detailed field investigation of the route and the environment in which the pipeline is to be constructed.

Pipeline detailed engineering, geotechnical engineering, and environmental specialist review, with appropriate agreements from Indigenous groups, landowners and stakeholders will confirm the locations for mainline pipe, station sites, cathodic protection (CP) sites and main line valve sites.

Municipalities, stakeholders and third parties will be contacted to obtain further details of any known or expected development or encroachments along the route, the location of underground obstructions, pipelines, services and structures and all other pertinent data. Traffic impact assessments will be completed as required in consultation with the City of Penticton and the Ministry of Transportation and Infrastructure. Stakeholder, local jurisdiction and government approval will be obtained in accordance with statutory requirements.

The outcome of the final stage of the routing process will comprise a confirmed pipeline route and complete list of the affected landowners and stakeholders which will facilitate preparation of the construction scope of work and detailed construction execution plans.

23.1 When does FEI expect to determine a confirmed pipeline route?

24. Reference: Exhibit B-1-2, page 68

5.4.2 Pipeline Design

The proposed OLI PEN 406 pipeline extension will operate at 7,826 kPa and be able to provide sufficient capacity to the existing ITS mainline pipeline to support forecast peak demand for the next 20 year period. The proposed OLI PEN 406 pipeline will traverse approximately 30 km in a south to north alignment from Ellis Creek near Penticton to Chute Lake south of Kelowna.

24.1 Please confirm or otherwise explain that the current upgrade means that there will be sufficient capacity along the full length of the ITS mainline pipeline to support forecast peak demand for the next 20 years.

24.2 If not confirmed, please provide a list of other pipeline or other ITS enhancements that FEI expects will be required to provide sufficient capacity to support forecast peak demand for the full length of the ITS mainline pipeline.

25. Reference: Exhibit B-1-2, page 70

> ***5.4.2.5 In-line Inspection***
>
> ILI is a process that utilizes the pipeline gas flow and pressure to propel an inspection tool within the pipeline. There are a number of types of ILI tools which are used to detect and size a variety of pipeline anomalies, including corrosion, mechanical damage and cracking.
>
> FEI has determined that due to the longevity of steel pipelines, it is appropriate to design the new OLI PEN 406 extension with ILI capability. This will enable cost effective and targeted mitigation of specific pipeline hazards (i.e., corrosion) over the service life of the new asset. Consequently, a receiver at the pipeline outlet (to receive the ILI tool) will be provided during the design and construction. The OLI PEN 406 has an existing launcher at the pipeline inlet (for tool insertion and to control the propulsion) at kilometre point 0.0. For further details see the Project Design Basis Memorandum, P-00760-PIP-DBM-0001, in the Appendix A-1.
>
> To facilitate ILI, the OCU Project pipeline design must incorporate certain features and mechanical components such as avoiding use of tight radius pipe bends, wall thickness transitions, and ensuring that all fittings and appurtenances (e.g. valves, tees) allow for consistent and reliable passage of ILI tools to maximize data collection.

25.1 FEI's Inland Gas Upgrade Project enables in-line inspection with Geometry, Magnetic Flux Leakage and Circumferential tools where the in-line inspection alternative was selected.[1] Please explain whether or not FEI's proposed capability will be consistent with the capabilities of the IGU project.

[1] FortisBC Energy Inc. Certificate of Public Convenience and Necessity Application for the Inland Gas Upgrade Project ~ Project No. 1598988, Exhibit B-5, Response to CEC IR 1.1.2

26. Reference: Exhibit B-1-2, page 78

5.6.1 Contractor/Consultant Selection and Award

Given the scale and scope of the Project, FEI will use a project delivery method that utilizes separate contracts for engineering design, construction management and inspection, and construction. The engineering design will be completed using a services contract for the complete design and development of bid packages. These bid packages will then be used to seek competitive pricing from contractors for the construction of the works.

Selection criteria will be developed and used to select contractors and consultants that will participate in the various procurement processes. The selection criteria will consider but not limited to items such as previous project experience, project references, Indigenous engagement, performance ability, financial stability, and WorksafeBC standing. Evaluation criteria will be developed and used to award each of the procurement contracts. Evaluation criteria will be unique to each of the contracts, but will generally include key personnel, experience and qualifications, performance ability and understanding of the scope requirement, and cost.

26.1 Does FEI typically use a delivery method utilizing separate contracts for engineering design, construction management and inspection and construction for large scale projects, or is this a novel methodology?

26.2 What project delivery alternatives did FEI consider, and why were they rejected?

26.3 Please describe the benefits of the delivery methodology and why it is superior to any alternatives that FEI considered.

26.4 Does using separate contracts potentially result in higher costs? Please explain why or why not.

26.4.1 If yes, please quantify the additional costs imposed by this delivery methodology.

26.5 If FEI had more time available to complete the Project, would FEI have selected a different methodology? Please explain why or why not.

27. Reference: Exhibit B-1-2, pages 78 and 79

5.6.2 Detailed Engineering Design and Land Acquisition

A consulting engineering firm will complete the engineering detailed design activities. Detailed design activities encompass all engineering calculations, validations, preparation of drawings and bid packages required to cover the Project needs. Detailed design will commence prior to obtaining CPCN approval due to the anticipated durations required for permitting and procuring long lead materials such as valves and pipe that are required in order to meet the proposed construction schedule. Engineering activities will be organized in order of priority, in relation to the fabrication/procurement lead times and the construction schedule.

The Project will require new and expanded ROW, temporary construction working space and access rights. FEI has developed a land acquisition plan to assess the required properties and prioritize the acquisitions based on risk and impacts to the schedule. Further details of the land acquisition are found in Section 8.2.5.3.

5.6.3 Procurement

Material required for the Project which have long lead times to fabricate and deliver include items such as line pipe and block valves. Prior to the receiving CPCN approval, FEI will procure all of the long lead material required in order to commence the early works construction in Q1, 2022. Where applicable, FEI will secure the remaining long lead material required for the Project through the contracts established for the early works.

27.1 Please describe the process that FEI will employ to select the consulting engineering firm.

27.2 Does FEI frequently begin projects prior to BCUC approval? Please explain and discuss the circumstances under which FEI begins projects prior to receiving BCUC approval.

27.3 In the event that FEI did not receive CPCN approval for the Project, which party would be responsible for the costs incurred to date? Please explain.

28. Reference: Exhibit B-1-2, page 79

5.6.5 Early Works Construction

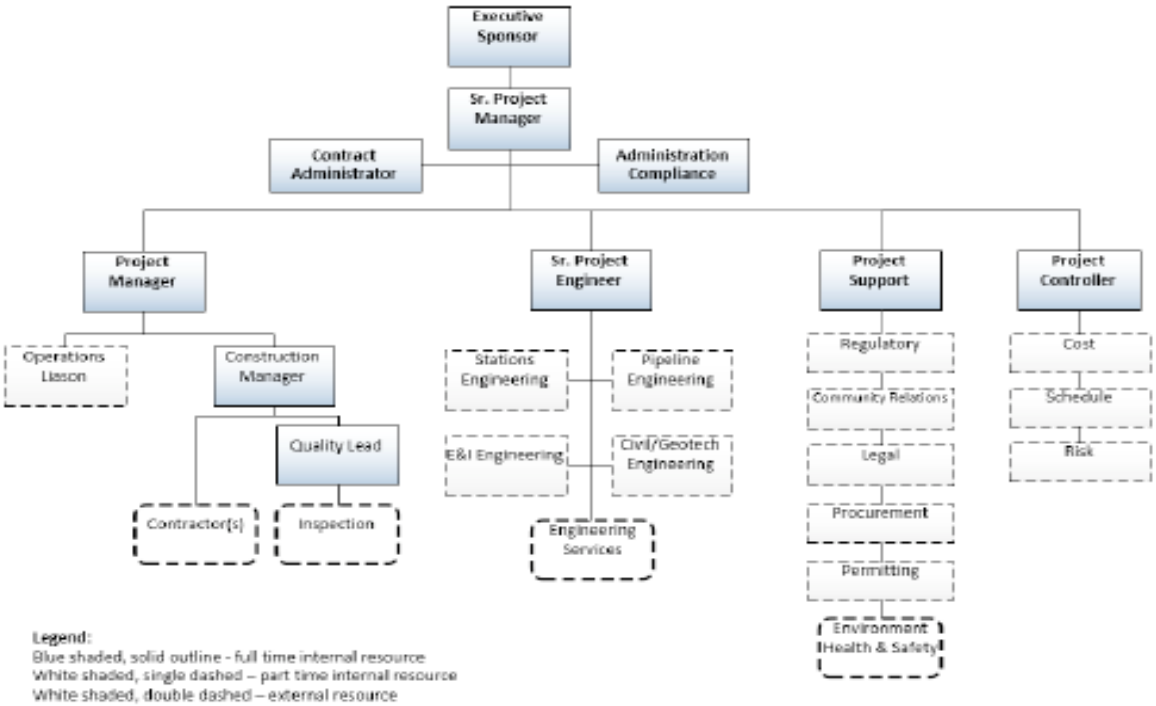
The main objective of the early works construction phase is to complete the HDD work. While the feasibility study concluded that HDD is a feasible option to cross Penticton Creek, there is still a risk that the HDD installation could be unsuccessful. FEI plans to address the risk as soon as possible in the Project to allow adequate time to implement the contingency plan of using an open trenching method across the drainage within the mainline contractor's scope of work.

To prepare for the HDD, the ROW must first be developed and graded to allow adequate land/space for both of the 820 m long pipe sections to be built. The ROW prep crew will first develop the area around Penticton Creek for the HDD and will then move to the north end of the project (Chute Lake) and begin clearing and developing the ROW working south. This early work is being advanced and is planned to be completed around the bird nesting season and prior to the 2022 wildfire season.

28.1 Might the early works construction also occur before BCUC approval, or would FEI not proceed in the event the approval was delayed or not provided? Please explain.

29. Reference: Exhibit B-1-2, page 80

Figure 5-4: Proposed Resources and Organizational Chart



The Executive Sponsor for the execution of the Project is the Vice President, Major Projects.

29.1 The CEC is unable to determine definitively which selections would be considered double-dashed and those single-dashed. Please confirm or otherwise clarify if the Contractor, Inspection, Engineering Services and Environment Health and Safety positions are the external resources.

29.2 Please explain why the Environment Health and Safety position is an external resource.

29.3 Does FEI allocate time for the part-time internal resources to the Project costing? Please explain.

30. Reference: Exhibit B-1-2, page 81

> ***5.8.1.2 Ecological Environment***
>
> The proposed alignment of the preferred alternative is located within or directly adjacent to existing rights of way as much as possible. The proposed route overlaps with watercourses, patches of mature trees, and areas with potential for plant communities at risk. Habitat for wildlife or plant species at risk was identified along the proposed alignment of the preferred alternative and surrounding area. Invasive plants are present in the vicinity of the proposed alignment.
>
> The proposed alignment of the preferred alternative was assessed for potential impacts or effects on the ecological environment. Final routing will be selected to minimize disturbance to sensitive environmental features. Best management practices will be applied to minimize any remaining potential negative impacts or effects on the environment. Invasive plant management will be applied throughout construction to minimize the potential spread or introduction of invasive plants. Some vegetation removal will be required during site preparation and construction.
>
> Contaminated sites may be present along the proposed alignment of the preferred alternative. Preliminary studies identified the location and nature of potential contaminated sites. Further studies will be completed prior to construction to identify appropriate handling and disposal techniques.

30.1 Does FEI work directly with the governing regional authority in order to manage the ecological impacts?

30.1.1 If yes, could FEI work jointly with the authority to reduce the invasive plant material rather than simply minimizing potential spread or introduction? Please explain.

30.1.2 If no, why not?

31. Reference: Exhibit B-1-2, page 82

> There are over 40 wineries along the Naramata Bench. FEI has included these considerations in its route selection process, and as such, has proposed a route that runs alongside FEI's existing VER PEN 323 right-of way and FBC's existing 73 Line right-of way where possible, to minimize the creation of additional right-of-way lands.
>
> The Kettle Valley Rail Trail (KVR) is a national historical site located in Naramata and runs in parallel with some sections of the OCU Project route. The KVR is a popular among cyclists who want to bike from Naramata to Kelowna. As such, FEI has recognized the importance of this historical site in its Project planning.
>
> FEI's plans to mitigate, manage and minimize potential short-term adverse effects and monitor Project impacts as construction proceeds. The mitigation measures will be based on industry best practices and applicable requirements of local regulations. To mitigate short-term adverse socio-economic impacts of Project construction, FEI will require the contractor to develop a Public Impact Mitigation Plan. Mitigation measures will include, for example, complying with municipal noise bylaws and limiting traffic access restrictions to businesses and residents during construction.

31.1 For how long does FEI expect its 'short term' impacts to last?

31.2 Will the KVR be shut down completely, or only in sections? Please explain.

32. Reference: Exhibit B-1-2, page 82

> FEI will also work with Indigenous and local leaders and organizations to identify and mitigate issues, and to connect local workforce and businesses to Project opportunities. Throughout the Project, FEI will endeavor to track the following: Project investment in local Indigenous communities, Project investment in municipalities/regional districts, local employment opportunities, and other community investment activities.
>
> The Project is expected to result in an overall positive impact to residents and businesses through the creation of additional employment, the procurement of local materials, and the use of local services, such as lodging and dining. Further, the Project will benefit the Okanagan region, by helping to meet long-term capacity requirements for a reliable and safe gas system, as population is forecast to increase for the next 20-year period as described in Section 3.3 of the Application.

32.1 In addition to tracking Project Investment in Indigenous communities, municipalities etc., has FEI also established objectives for investment levels that it intends to meet? Please explain.

32.1.1 How can the BCUC determine whether or not the investment levels are appropriate? Please explain.

33. Reference: Exhibit B-1-2, pages 87 and 88

5.10.3 Cost Verification and Validation

Cost estimate quality assurance and validation were completed as follows:

- Internal SMCI reviews that included peer reviews, document quality checks, and independent review;
- Validation reviews involving both SMCI and FEI team members throughout the estimate development process to confirm that the estimate assumptions were valid; and
- External independent review completed to verify and validate that the estimate as well as schedule criteria and requirements were met, comparing estimate to the appropriate cost metric and a credible estimate and schedule have been developed for the full construction scope of the Project.

Any material discrepancies or risks identified during the cost validation process were considered during the risk analysis.

5.10.4 Risk Analysis

FEI engaged Yohannes Project Consulting Inc. (YPCI), a company specializing in risk management, to conduct a qualitative risk analysis to identify all of the risks associated with the Project. YPCI conducted multiple workshops with the Project team to develop a risk register for the Project to identify risks that could likely occur.

FEI also retained Validation Estimating LLC, USA (Validation Estimating), a company that provides services in estimate validation, risk analysis and contingency estimation. Validation Estimating completed an escalation estimate and a quantitative analysis using an integrated parametric and expected value methodology based on AACE 42R.

FEI will hold contingency[26], management reserve[27] and escalation funds in addition to the Project base cost estimate as outlined in Section 5.10.1 to address all foreseeable risks. The following sections (5.10.4.1 – 5.4.10.7) outline the methodology used to understand the risks inherent with the Project and the funding required to address the risks.

5.10.4.1 Risk Identification Planning

The risk identification and qualitative analysis conducted by YPCI was completed using the AACE International Recommended Practice 62R-11: *Risk Assessment: Identification and Qualitative Analysis* (AACE 62R-11, Revision May 11, 2012) as a guide. First, the risks were identified through collaborative discussions between YPCI and FEI through a series of risk workshops facilitated by YPCI. Next, the team developed the risk response actions and the risk likelihood and consequence scales.

The risk likelihood and consequence scales used for the Project are based on the 5 by 5 risk assessment matrix recommended in AACE 62R-11 which is illustrated in Figure 5-5.

33.1 Which company conducted the external independent review, and how was it selected?

33.2 If it was not Yohannes Project Consulting Inc., please explain why not.

33.3 What process did FEI undertake to select Yohannes Project Consulting Inc. to conduct the qualitative risk analysis?

34. Reference: Exhibit B-1-2, pages 89 and 90

5.10.4.3 Quantitative Risk Analysis - Contingency

Following the completion of the YPCI Risk Report, Validation Estimating completed a quantitative analysis to evaluate the impact of Project specific risks and systemic risks. A Monte Carlo simulation was completed by Validation Estimating to determine a distribution of possible cost outcomes associated with the existing scope of the Project at different levels of confidence. The analysis was conducted using the base Project cost estimate of $187.0 million as outlined in section 5.10.1 above and derived a risk adjusted P50 cost of $213 million representing a contingency of approximately 13 percent. Please refer to Confidential Appendix C-2 for further details on Validation Estimating's contingency methodology and results.

The output of the Monte Carlo simulation, is shown in tabular form in Figure 5-6:

Figure 5-6: Quantitative Risk Analysis - Monte Carlo Simulation

Base Estimate:	$187,000	Currency:	$CAN
Probability of Underrun	Indicated Funding Amount	Contingency	
		Costs (thousands)	Percent of Base Est.
5%	171,500	(16,500)	-9%
10%	179,500	(8,500)	-5%
15%	185,200	(2,800)	-1%
20%	190,100	2,100	1%
25%	194,800	6,800	4%
30%	198,700	10,700	6%
35%	202,400	14,400	8%
40%	206,100	18,100	10%
45%	209,700	21,700	12%
50%	213,100	26,100	13%
55%	217,000	29,000	15%
60%	220,400	32,400	17%
65%	224,400	36,400	19%
70%	228,400	40,400	21%
75%	233,200	45,200	24%
80%	238,600	50,600	27%
85%	244,700	56,700	30%
90%	252,900	64,900	35%
95%	265,000	77,000	41%

34.1 Please confirm or otherwise explain that the above table is in thousands of $2020.

34.2 Without jeopardizing confidential information, please confirm or otherwise explain that a P50 estimate would indicate that there is a 50% chance that the Project cost would not be exceed $213 million, and a corresponding 50% chance that the Project would not be

under $213 million, such that $213 million represents an approximate middle ground estimate.

34.3 Is 13% a standard contingency? Please explain and provide quantification of the range of contingencies that are typical.

34.3.1 If not within a typical range, please explain why not.

35. Reference: Exhibit B-1-2, pages 90 and 91

5.10.4.4 Quantitative Risk Analysis - Management Reserve

Risks with low probabilities and high consequence are not appropriately funded through contingency as they overwhelm the cost and schedule allotments. The cost associated with these types of risks are typically identified and managed as management reserves that the project team cannot spend without the Company's management's approval. Validation Estimating identified two risks which have low probability and high consequence; failed HDD across Penticton Creek, and market costs.

The preliminary feasibility assessment completed by TerraHDD, a company specializing in HDD concluded that the Project could drill a path under Penticton Creek. HDD at this location minimizes stakeholder and environmental impacts and is the lowest cost option for the Project. Significant geotechnical work was undertaken to evaluate the feasibility of HDD but there is always uncertainty remaining as most of the subsurface conditions along the drill path cannot be fully assessed. Therefore, the success of HDD is not realized until the drilling is complete and the pipe is pulled into the hole. As such there is a high risk to the Project should the HDD fail, as the contingency plan consists of attempting a subsequent drill, and failing that the plan is to open trench across a very steep ravine. FEI and SMCI have identified an open trench route across Penticton Creek and this option is currently under evaluation. FEI will proceed with the design and permitting of both the HDD and the open trench options to minimize delays should the HDD prove not feasible. Table 5-12 outlines the range of possible outcomes stemming from an unsuccessful HDD across Penticton Creek.

During the cost validation process outlined in Section 5.10.3, FEI identified that there is a market risk to the Project due to factors such as contractor capacity, the availability of qualified pipeline contractors in 2022 and 2023 and market risk where bids are uncompetitive. FEI considered market prices as a risk that could impact the Project cost and undertook additional

analysis. The results of the market risk analysis indicate that there is a possible uplift in the price to be quoted by a contractor and FEI retained Validation Estimating to conduct an analysis of the possible uplift in actual bids versus estimate. Table 5-12 outlines the range of possible outcomes resulting from market risk. Please refer to Confidential Appendix C-2 for further details on Validation Estimating's management reserve methodology and results.

Table 5-12: Summary of Management Reserve Monte Carlo Simulation (2020$)

Probability of Underrun	Indicated Risk Funding	
	HDD Failure	Market Risk
5%	10,300	1,300
10%	11,200	2,600
15%	11,900	4,100
20%	12,500	5,600
25%	12,900	7,000
30%	13,400	8,500
35%	13,700	10,000
40%	14,100	11,700
45%	14,500	13,500
50%	14,900	15,300
55%	15,300	17,200
60%	15,700	19,200
65%	16,000	21,300
70%	16,500	23,600
75%	16,900	26,200
80%	17,400	28,800
85%	18,100	32,000
90%	18,800	35,400
95%	19,900	40,200

35.1 Please confirm or otherwise explain that the above table is in thousands of $2020.

35.2 Please elaborate on the possible causes of the potential uplift in prices.

35.3 Does the above table indicate a P50 estimate would require a Management reserve of $14,500,000 plus $15,300,000 for a total of $30,200,000? Please explain.

36. Reference: Exhibit B-1-2, page 91

5.10.4.5 Quantitative Risk Analysis Conclusion – Contingency and Management Reserve

Contingency is typically expected to be spent and is used as an allocation for risks that are known and likely to be encountered during Project execution. Contingency is normally funded at the P50 confidence level. Based on FEI's risk tolerance, the Project contingency will be $25.1 million (13 percent) at the P50 confidence level.

The probability of both management reserve risks occurring is low, therefore, FEI will hold one reserve fund to cover the impact should either of the risks occur. Given there are two risks covered by a single management reserve, FEI has chosen to fund the P70 value of the larger risk or $23.6 million.

36.1 Please confirm that the Market Risk and the HDD Failure risk are not mutually exclusive.

36.2 Do the Market Risk and the HDD Failure risk overlap, such that the Market Risk will be greater if the HDD Failure risk occurs? Please explain.

36.3 Please elaborate on why FEI selected the P70 value of the Market Risk for the management reserve instead of any other value, such as P80 of the Market Risk or adding the two risks together.

37. Reference: Exhibit B-1-2, pages 91 and 92

> ***5.10.4.6 Escalation Risk***
>
> Validation Estimating conducted a cost escalation estimate for the Project. Escalation per AACE is "a provision in costs or prices for uncertain changes in technical, economic, and market conditions over time. Inflation (or deflation) is a component of escalation." The base estimate was developed using 2020 pricing data and conditions and does not inherently account for escalation. Price increases/decreases beyond 2020, including contingency, must be covered by the escalation estimate. As outlined in Section 5.10.4.5, FEI will fund contingency at the P50

confidence level, therefore the escalation estimate is calculated using the risk adjusted P50 cost of $213 million as outlined in section 5.10.4.3 as the basis.

The AACE "by-period" method was applied to develop the cost escalation estimate. This method uses price indices by cost account applied to the annual cash flow by cost account. The base indices are forecasts provided by the economic consulting firm IHS Markit. These indices are used to develop weighted indices that match the cost types (pipeline material, construction labour, etc.). The indices are further adjusted for forecast global and regional capital spending market conditions (i.e., adjusts for bid mark-up behaviour as well as productivity trends in hot or cold markets).

The IHS Markit Q3 2020 forecast is showing minimal cost escalation through 2022 (with the exception of pipe steel) with a slight decrease forecast for the remainder of 2020. However, global and regional capital spending is forecast to rebound by 2022 with the weighted annual price increase forecast to peak at 2.8 percent. The probabilistic analysis, which takes into account the historical standard deviation in price changes from the mean, results in a significant range as shown in Table 5-13. Please refer to Confidential Appendix C-3 for further details on Validation Estimating's escalation methodology and results.

Table 5-13: Summary of Escalation Monte Carlo Simulation (2020$)

Base Estimate	$213,059,800	
Probability of Underrun	**Escalation**	Percent of Base
5%	(9,638,420)	-4.5%
10%	(5,672,540)	-2.7%
15%	(2,685,690)	-1.3%
20%	(146,230)	-0.1%
25%	2,084,160	1.0%
30%	4,198,420	2.0%
35%	6,114,320	2.9%
40%	7,932,070	3.7%
45%	9,718,200	4.6%
50%	**11,611,240**	**5.4%**
55%	13,473,460	6.3%
60%	15,393,410	7.2%
65%	17,470,720	8.2%
70%	**19,522,520**	**9.2%**
75%	21,858,100	10.3%
80%	24,311,300	11.4%
85%	26,931,670	12.6%
90%	30,395,630	14.3%
95%	35,810,570	16.7%

FEI will fund escalation at $11.6 million which corresponds to the P50 level of confidence.

37.1 Please explain how Escalation Risk differs from Market Risk.

38. Reference: Exhibit B-1-2, pages 94 and 95

Table 6-2 below includes the financial evaluation of the Project over a 70-year period (65 years post-Project and 5 prior years during the Project)[29]. Details of the financial evaluation of the Project can be found in the Financial Schedules as included in Confidential Appendix E-2.

Table 6-2: Financial Analysis of the Project ($millions)

Item	Amount
Total Charged to Gas Plant in Service	$271.3
Total Project Deferral Credit	$(0.8)
Total Project Cost	$270.5
Incremental Rate Base in 2024[30]	$269.6
Incremental Revenue Requirement in 2024	$19.4
Rate Impact in 2024 when all assets enter Rate Base %	2.21%
Levelized Delivery Rate Impact 70 Years (%)	1.62%
Levelized Delivery Rate Impact 70 Years ($ / GJ)	$0.073
PV of Incremental Revenue Requirement 70 years ($ million)	$253.6
Net Cash Flow NPV 70 years ($000s)	$(7.1)

[29] The 65-year post-project analysis period is equal to the financial life for Transmission Mains as described on page 3-6 of FEI's most recently approved depreciation study. The 5 prior years are related to project development, regulatory approvals, and the construction schedule of the Project from 2022 through 2023.

[30] 2024 Rate Base is less than the Total Project costs because the 2024 Rate Base also includes the mid-year effect of Accumulated Depreciation and allowance for incremental Cash Working Capital.

[31] FEI's 2021 AFUDC rate is 5.47%, which is equal to the after-tax weighted average cost of capital.

38.1 Please provide the costs per year (actual and forecast) for the 2018-2023 period.

38.2 Does FEI include costs related to abandonment or removal in its analysis? Please explain why or why not.

38.2.1 Please provide an estimate of the costs related to abandonment or removal at the end of the 70-year period.

39. Reference: Exhibit B-1-2, page 96

6.3.2 Application and Preliminary Stage Development Costs

FEI is seeking BCUC approval under Sections 59-61 of the UCA for deferral treatment of the Application and Preliminary Stage Development costs. The Application costs are based on a written hearing process and include expenses for legal review, consultant costs, BCUC costs and BCUC-approved intervener costs. The Preliminary Stage Development costs are related to expenses incurred for engaging third-party consultants for feasibility evaluation, preliminary development and assessment of the potential design and alternatives as required to complete this Application. FEI is seeking approval to record these costs in a new non-rate base deferral account, the OCU Application and Preliminary Stage Development Costs Deferral Account, attracting FEI's after tax weighted average cost of capital until it enters rate base. FEI proposes to transfer the balance in the deferral account to rate base on January 1, 2022 and commence amortization over a three-year period.

Table 6-3 below shows the December 31, 2020 net-of-tax balance for the Application costs and the Preliminary Stage Development costs is forecast to be a credit of $795 thousand.

Table 6-3: Forecast Application Costs and Preliminary Stage Development Costs ($000s)

Particulars	Application Costs	Preliminary Stage Development Costs	Total
Pre-tax Costs	$400	$902	$1,302
Income Tax Recovery:			
Costs held in deferral account[32]	$(108)	$(244)	$(352)
Capitalized Costs[33]		$(1,682)	$(1,682)
Total Tax Offset	$(108)	$(1,926)	$(2,034)
Financing, WACC after tax	$10	$(73)	$(63)
Total	$302	$(1,097)	$(795)

39.1 Please explain why income tax recovery benefits are deferred into the non-rate base deferral account as opposed to being recorded in the year realized.

40. Reference: Exhibit B-1-2, pages 96 and 97

6.4 *Rate Impact*

As discussed above, FEI will complete the Project in 2023. Combined with the amortization of the deferral costs beginning in 2022, the impact to customer delivery rates will change each year from 2022 to 2024[34]. Table 6-4 shows the annual delivery rate impact compared to the 2021 applied for non-bypass revenue requirement and the incremental annual delivery rate impact in percentage in 2024.

[32] Income tax recovery on the amount recorded in the deferral account which equals the $400 thousand in costs and the $902 thousand in costs times the Income tax rate of 27%.

[33] Income tax recovery on the development costs that were capitalized but are deductible for tax purposes. The amount shown is equal to the costs capitalized of $6.2 million times the income tax rate of 27%.

[34] The first two years of delivery rate impact due to the Project are 2022 and 2023 as a result of the amortization of the deferral credit balance.

Table 6-4: Summary of Rate Impact for the Project

Particulars	Impact
Incremental Revenue Requirement ($000s)	$19,448
% Increase to 2021 Applied for Revenue Requirement, Non-Bypass (August, 2020)[35]	2.21%
Delivery Rate Impact (2024) $ / GJ	$0.100
Levelized Rate Impact $ / GJ (2019 – 2088)	$0.073

In conclusion, the Project will result in an estimated delivery rate impact of 2.21 percent in 2024 when all construction is complete and after all assets are placed in service in 2023. For a typical FEI residential customer consuming 90 GJ per year, this would equate to an approximate average bill increase of $9.00 per year ($0.100 / GJ x 90 GJ).

40.1 FEI states that the impact to customer delivery rates will change each year from 2022 to 2024. Please provide the delivery rate impact for each year including 2022 and 2023.

40.2 Please provide approximate average bill increases for commercial customers by rate class.

41. Reference: Exhibit B-1-2, pages 105 and 106

7.3.2 Indigenous Community Participation

Notifications were sent to Indigenous communities prior to the onset of the AOA. The notification outlined the intended work and, as noted above, on completion of the draft AOA an opportunity to provide information or comments.

The following communities were contacted as a part of the AOA:

- Esh-kn-am Cultural Resource Management
- Lower Similkameen Indian Band
- Nooaitch Indian Band
- Okanagan Indian Band
- Okanagan Nation Alliance
- Penticton Indian Band
- Upper Nicola Band
- Westbank First Nation

During fieldwork activities to develop this application, Indigenous communities were invited to participate. Both Penticton Indian Band (PIB) and Westbank First Nation (WFN) participated in

PFR activities. Prior to the AIA, Indigenous communities will be notified of the work and provided the opportunity to participate in the AIA.

41.1 Please confirm that the above list represents a complete list of affected Indigenous communities.

41.1.1 If not confirmed, please explain why not and identify any other Indigenous communities that were not contacted as part of the AOA.

42. Reference: Exhibit B-1-2, page 106

A project EMP which will include archaeological specifications, will be prepared and included in the contractor RFP documents. The EMP is also required as a part of the application to the OGC. Environmental Protection Plan(s) specific to the Project, including protection of archaeological, historic heritage and, cultural resources, will be developed by successful contractor(s) prior to commencement of the Project.

If required, archaeological monitoring will be undertaken during all archaeologically sensitive aspects of the work program and the designated archaeological monitor will have "stop work authority" in the event that works underway have the potential to result in unauthorized impacts to archaeological, historic heritage or cultural resources.

42.1 Please confirm that EMP stands for Environmental Management Plan.

43. Reference: Exhibit B-1-2, pages 109, 112 and 113

8.2.2 FEI Has Identified Key Stakeholders for Public Consultation

As part of developing its Consultation and Engagement Plan, FEI identified and consulted with the following stakeholders:

1. Residents, businesses, FEI's gas customers, and stakeholder groups, all of whom are in close proximity to (and may be impacted by) the Project.
2. Landowners who are in close proximity and potentially impacted by the Project.
3. Provincial government bodies, including Members of the Legislative Assembly, the Ministry of Energy, Mines and Petroleum Resources, the Ministry of Transportation and Infrastructure, the Ministry of Forests, Lands, Natural Resource Operations and Rural Development, the Agricultural Land Commission, and the BCOGC.
4. Federal government bodies, including Fisheries and Oceans Canada, and Environment and Climate Change Canada.
5. Local governments including the Mayor, Council, Regional Board members, City Manager and/or staff within the following municipalities and regional district: City of Penticton, RDOS, City of Kelowna, and City of West Kelowna.

Based on feedback from these stakeholders, FEI will continue to refine its communication and consultation methods.

8.2.5.2 Consultation to Date with Stakeholder Groups

FEI consulted with the following stakeholder groups impacted by the Project and the consultation with these stakeholders is included in the consultation log in Appendix H-2.

- Penticton Area Cycling Association – The Three Blind Mice Trails
- Penticton Disc Golf Course
- Naramata Bench Winery Association
- Naramata Citizens Association
- South Okanagan Trail Alliance
- Hoodoo Adventure Company Ltd.
- Chute Lake Lodge
- Upper Carmi Neighbourhood Association
- Okanagan Similkameen Stewardship Society (OSS)

FEI offered to discuss the Project individually with the organizations and local stakeholder groups, and also invited them to participate in the virtual project information sessions. No significant issues were identified in our outreach and there was general support for the Project.

43.1 Did FEI consult with individual businesses, or just associations? Please explain and identify how many businesses FEI consulted directly.

43.2 FEI states that it will refine its communications and consultation methods based on feedback. Is FEI open to making changes to its proposal based on customer feedback? Please explain.

44. Reference: Exhibit B-1-2, page 125

9.1 *Introduction*

Section 46 (3.1) of the UCA states that in considering whether to issue a CPCN, the BCUC must consider:

(a) the applicable of British Columbia's energy objectives,

(b) the most recent long-term resource plan filed by the public utility under section 44.1, if any, and

(c) the extent to which the application for the certificate is consistent with the applicable requirements under sections 6 and 19 of the *Clean Energy Act* (CEA).

Sections 6 and 19 of the CEA, as referred to in (c) above, do not apply to FEI. FEI addresses the other two requirements below.

9.2 BRITISH COLUMBIA'S ENERGY OBJECTIVES

British Columbia's energy objectives are defined in section 2 of the CEA. Based on the results of the socio-economic assessment described in Section 5.8.2, the Project will support the British Columbia energy objective found in section 2(k) of the CEA "to encourage economic development and the creation and retention of jobs".

The Project will support this objective by having positive employment impacts and by contributing to the local economy in the central and north Okanagan regions. In particular, the procurement of local materials, and the use of local services, such as lodging and dining. Further, the Project will benefit these Okanagan regions, by helping to meet long-term capacity requirements for a reliable and safe gas system, as some communities are expected to grow by up to 40 percent in the next 20 years.

The work is anticipated to occur in a largely rural landscape, with low population density, and alongside existing rights-of-ways. However, FEI will develop a Public Impact Mitigation Plan, which will outline strategies to minimize community impacts. FEI will also work with Indigenous and local leaders and organizations to develop the local workforce, support local businesses, and connect them to Project opportunities.

44.1 Please identify any areas in which the project is contrary to the energy objectives, and explain why.