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Utilities Commission

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March 4, 2021

Sent via email/eFile

CREATIVE ENERGY - 2021 LONG TERM RESOURCE PLAN EXHIBIT A-4
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Mr. Rob Gorter
Director, Regulatory Affairs and Customer Relations
Creative Energy Vancouver Platforms Inc.
Suite 1 - 720 Beatty Street
Vancouver, BC V6B 2M1
rob@creative.energy; info@creative.energy

**Re: Creative Energy Vancouver Platforms Inc. – 2021 Long-term Resource Plan – Project No. 1599175 –
 BCUC IR No. 1**

Dear Mr. Gorter:

Further to the above-noted matter, enclosed please find British Columbia Utilities Commission Information Request No. 1 on Long Term Resource Plan. Please file your responses by Thursday, March 25, 2021.

Sincerely,

Original signed by:

Patrick Wruck
Commission Secretary

/jo
Enclosure



Creative Energy Vancouver Platforms Inc.
2021 Long Term Resource Plan

INFORMATION REQUEST NO. 1 TO CREATIVE ENERGY VANCOUVER PLATFORMS INC.

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A. INTRODUCTION

- 1.0 Reference: INTRODUCTION
Exhibit B-1, Application, p. 3
BCUC Resource Planning Guidelines¹
Long Term Resource Plan objectives**

Section 1 of the British Columbia Utilities Commission (BCUC) Resource Planning Guidelines states:

Identification of the planning context and the objectives of a resource plan
...

Objectives include, but are not limited to: adequate and reliable service; economic efficiency; preservation of the financial integrity of the utility; equal consideration of DSM and supply resources; minimization of risks; compliance with government regulations and stated policies; and consideration of social and environmental impacts.

Page 3 of Creative Energy Vancouver Platforms Inc.’s (Creative Energy) 2021 Long Term Resource Plan (Application), states:

Creative Energy continues to pursue initiatives to add customers and extend the system to serve them. A further and interrelated objective of Creative Energy’s long term resource planning is to maintain existing customers.

- 1.1 Please clarify whether the primary objectives of the 2021 Long Term Resource Plan (LTRP) are: (i) to add customers and extend the system to serve them, and (ii) to maintain existing customers.

¹ BCUC Resource Planning Guidelines, https://www.bcuc.com/Documents/Guidelines/RPGuidelines_12-2003.pdf

- 1.2 Please discuss whether Creative Energy considered other potential objectives, and if so why these were ultimately not included in the 2021 LTRP.

B. LOAD FORECAST

2.0 Reference: LOAD FORECAST Exhibit B-1, Section 1.1, p. 1 Loads served

On page 1 of the Application, Creative Energy states: “this LTRP addresses the planning for future resources to serve both the Core Steam System and NEFC [Northeast False Creek] System.”

- 2.1 Please discuss whether any planning decisions pertaining to the Core Steam System and NEFC System during the LTRP forecast period could have any impact upon planning decisions for other utilities owned by Creative Energy Vancouver Platforms.
- 2.2 Please discuss whether Creative Energy considers its LTRPs could address all non-Stream A utilities owned and operated by Creative Energy Vancouver Platforms.
- 2.3 Please discuss if Creative Energy has load forecasts and a forecast of facilities required to serve its Vancouver House Development available for the LTRP forecast period.
 - 2.3.1 If so, please provide this analysis.
 - 2.3.2 If not, please provide an estimate of the time and process that would be required to prepare such analysis.

3.0 Reference: LOAD FORECAST Exhibit B-1, Section 3.1.1, p. 15 Boiler capabilities

On page 15 of the Application, Creative Energy states:

The Redevelopment Project retains Boiler #3 for the time being to manage risks related to the timing of customer additions and losses. Boiler #3 can be removed and replaced with a larger and more efficient boiler if and when needed after the Redevelopment Project is complete. Decommissioning and possible replacement of Boiler #3 and any further increase in overall generation capacity would be subject to review by the Commission.

- 3.1 Please explain when, or under what circumstances, Creative Energy anticipates requiring a larger or more efficient boiler to replace Boiler 3.
 - 3.1.1 Please discuss the expected costs of replacing Boiler 3.

4.0 Reference: LOAD FORECAST Exhibit B-1, Section 3.1.3, p. 17 GHG emissions

On page 17 of the Application, Creative Energy states: “Creative Energy is subject to GHG emissions reporting requirements. Creative Energy’s total emissions are approximately 100,000 t CO₂e per year.”

- 4.1 Please explain how Carbon Tax rates may impact Creative Energy’s rates over the next 20 years.

- 4.1.1 Please discuss how Creative Energy anticipates such rate impacts may affect customer load.
- 4.1.2 Please explain whether Creative Energy contemplated Carbon Tax rates impacts in the load forecasts.

**5.0 Reference: LOAD FORECAST
Exhibit B-1, Section 3.1.4, pp. 17–18
NEFC load forecast**

On page 18 of the Application, Creative Energy states:

The City [of Vancouver] has extended their connection bylaw to now include the future development in the NEFC neighbourhood, which means that the City will provide service to the future developments in NEFC, rather than Creative Energy.

Creative Energy intends to supply the hot water to serve the City's loads in the NEFC as it develops using the installed capacity and capital expansions as contemplated when the CPCN for the NEFC System was granted. However, the necessary arrangements with the City have not been made yet for Creative Energy to serve that load and are subject to the City's processes. At this point in time therefore, Creative Energy does not have a consolidated forecast of load growth in the NEFC neighbourhood and the timing of the required incremental capacity investments to support that load growth is uncertain.

- 5.1 When does Creative Energy anticipate that future loads resulting from the new developments in NEFC will require service?
 - 5.1.1 Please confirm, or explain otherwise, that the load forecasts in the Application do not include load from the new developments in NEFC.
 - 5.1.2 Please explain whether Creative Energy currently has sufficient capacity to serve these City loads in NEFC.
- 5.2 Please further explain "the City's processes" regarding the serving of the City's loads in NEFC, and the anticipated timing of these processes.
 - 5.2.1 Please discuss any additional actions Creative Energy intends to take in this regard.
- 5.3 Please explain whether there is any requirement for hot water supplied to the City's new loads in NEFC to be generated from low carbon sources.

**6.0 Reference: LOAD FORECAST
Exhibit B-1, Section 3.2, pp. 18–20, 22–23
Existing customers served by steam plant**

Creative Energy's Application on pages 18 to 19 lists its current Steam and Hot Water customers. On page 20, Creative Energy states: "Weather and additions or losses of large customers have a greater effect on peak demand than changes within individual buildings."

- 6.1 Please explain whether Creative Energy has performed any engagement with its existing customers in preparation of its load forecast.
 - 6.1.1 If yes, please provide a record of these engagements, including a description of the type of customers, the feedback received and how that was incorporated in the load forecasts.

6.1.2 If not, please explain why not.

On pages 22 to 23 of the Application, Creative Energy states:

Overwhelmingly, permanent partial loss of load is due to customers undertaking projects to switch part of their heating energy system from reliance on steam to a lower carbon alternative and/or to add some form of heat recovery to their system. In recent years, nine Creative Energy customers have added some form of heat recovery to their heating system and/or partially switched their system to lower-carbon alternatives. These projects were largely to install heat recovery systems, where heat recovered from cooling systems is used to provide heat or hot water to the building, thus reducing their steam demand. There was at least one project involving geo-exchange in combination with heat recovery.

6.2 Please further explain the options Creative Energy's current customers have to move away from Creative Energy service to meet their heating, cooling and domestic hot water needs.

6.2.1 Please discuss the low carbon alternatives that Creative Energy customers are partially switching to.

6.3 Please discuss any feedback Creative Energy has received from former or existing customers on their reasons for considering switching thermal energy source(s).

6.4 Please provide any analysis Creative Energy has undertaken with respect to the costs of alternative options for Creative Energy's customers.

6.5 Please explain how Creative Energy rates compare to the costs of other options for current customers.

6.5.1 Please discuss the extent to which changes in the costs of Creative Energy's service and/or alternative customer options may impact the rate of attrition of existing loads.

**7.0 Reference: LOAD FORECAST
Exhibit B-2, p. 2; Exhibit B-3, pp. 2–7;
BCUC Resource Planning Guidelines, p. 4
Creative Energy, Application for Heating Rates for the Heating Thermal Energy System and Cooling Rates for the District Cooling System at the Vancouver House Development, Exhibit B-9, Panel IR 2.1
Load forecast scenarios**

In Exhibit B-3, Creative Energy provides its load forecasts in Figure 5 on page 3 and Figure 2 on page 5. On page 6 of Exhibit B-3, Creative Energy states: "For clarity, the planning horizon of the LTRP begins as at the end of 2024 when all components of the Expo and Beatty Plants Redevelopment Project are expected to be in service. That is the base case in the LTRP from which to plan for future resources."

Page 4 of the BCUC Resource Planning Guidelines states: "For each of the gross demand forecasts, several plausible resource portfolios should be developed, each consisting of a combination of supply and demand resources needed to meet the gross demand forecast. The gross demand forecasts and the resource portfolios should cover the same period, generally 15 to 20 years into the future."

7.1 Please explain why the Creative Energy LTRP has a shorter time horizon than 15 to 20 years.

7.2 Please submit an updated version of Figure 2 and Figure 5 from Exhibit B-3, showing the timeline extended to at least 2035 or 2040. Please explain any key assumptions made.

On pages 3 through 7 of Exhibit B-3, Creative Energy describes the following load forecast scenarios:

- a) Attrition
- b) Baseline core forecast
- c) Baseline core + NEFC forecast
- d) 50% growth scenario
- e) 100% growth scenario

With respect to the Attrition scenario, Creative Energy states load attrition was assumed to be 5000MWh per year of customer steam beginning in 2023. In 2023, that equates to about 1.3% of the annual load.

With respect to the 50% and 100% growth scenarios, Creative Energy submits that using publicly available development information, an inventory of upcoming development projects was created for downtown Vancouver, and estimates made of their potential steam demand and year of energization.

In Exhibit B-2, Creative Energy states it will be applying for a Certificate of Public Convenience and Necessity (CPCN) to develop a decarbonization project to supplement its existing natural gas boilers. On page 2 of Exhibit B-2, Creative Energy describes the City of Vancouver's Request for Proposals (RFP) for low carbon energy.

- 7.3 Please further explain the methodology behind Creative Energy's load forecast development. Please include a list of all sources of data analysed and outside parties consulted in the development of each scenario.
- 7.4 In the "Attrition" scenario, please explain the basis for the assumed 5000MWh/year decrease in load. Please discuss any specific drivers that may influence the rate of load attrition.
- 7.5 Please provide further explanation of the process for developing estimates of potential steam demand based on upcoming development projects.
 - 7.5.1 Please outline the time horizon that public information regarding new developments in downtown Vancouver is available.
 - 7.5.2 Please discuss the key factors that would impact Creative Energy's ability to capture new customers from these development projects.
 - 7.5.2.1 Please discuss whether there are any potential limitations regarding Creative Energy connecting to certain new developments, such as proximity to the existing distribution system.
 - 7.5.3 Please clarify whether the 50% and/or 100% Growth scenarios assume a successful bid in the City of Vancouver's RFP.
 - 7.5.3.1 If yes, please discuss the annual load assumed for each year of the forecast.
 - 7.5.3.2 If not, please explain why not.
- 7.6 For each of the scenarios listed above, please explain how Creative Energy intends to meet the load forecast through to 2035 or 2040, including whether additional capital projects would likely be required to meet the load, and what alternative portfolios of input energy resources may be applicable to each scenario.
- 7.7 Please explain why Creative Energy is unable to quantify the probability of any scenario.
 - 7.7.1 Please discuss whether Creative Energy has a view on which scenario(s) are the most likely to materialize, and discuss the key assumptions affecting whether the scenario(s) will materialize.

- 7.8 Please explain what impact, if any, there would be to Creative Energy’s ability to meet customer demand if the decarbonization project did not take place.

In Exhibit B-9 to the Creative Energy’s Application for Heating Rates for the Heating Thermal Energy System and Cooling Rates for the District Cooling System at the Vancouver House Development, which is currently before the BCUC, in response to Panel Information Request (IR) 2.1, Creative Energy stated: “Creative Energy is having discussions with the City of Vancouver and nearby developers about potential plant locations, as well as studying the potential to extend Creative Energy’s Core steam system and install steam-to-hot-water conversion. As of yet, no decisions have been made as to the preferred solution.”

- 7.9 Please explain whether any of the load forecast scenarios considered the Core Steam system serving other Creative Energy utilities, such as Vancouver House.

On page 3 of Exhibit B-3, Creative Energy states:

no price elasticity assumptions are reflected in any of the load forecast scenarios and such are not necessary. Price elasticity is not directly applicable based on the means for how the load forecast scenarios were built up, as elaborated below. That is, the nature of the load forecast scenarios is such that there are no demand-side effects of price, cost or rates incorporated into them.

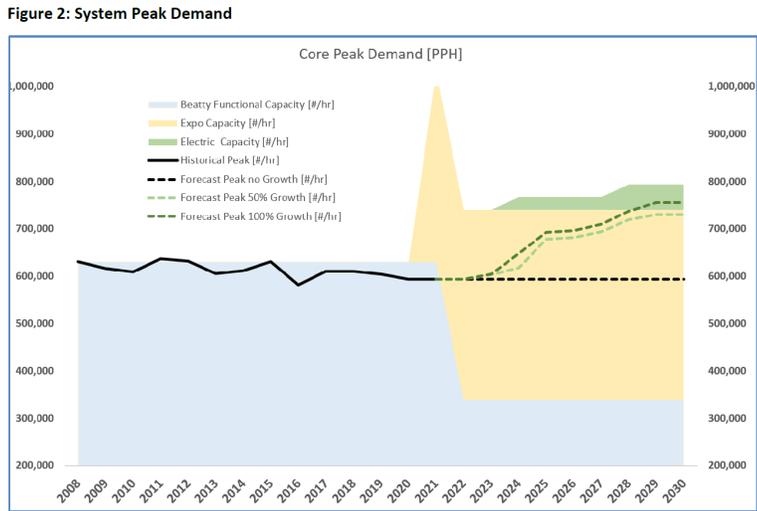
On page 2 of Exhibit B-3, Creative Energy states:

The 100% growth scenario as presented in the LTRP therefore represents an upper bound of the load growth Creative Energy could serve if such potential customers choose service from Creative Energy over their alternatives for heating service at their buildings. Creative Energy does not expect that 100% of that growth would choose Creative Energy. It could be plausible that Creative Energy could serve in the range of 50% of that growth if Creative Energy is able to offer an attractive nature and quality of service in terms of environmental attributes and cost. [emphasis added]

- 7.10 Please provide an estimate of Creative Energy’s levelized rates for each of the load forecast scenarios, provided as a range if applicable.
- 7.10.1 Please summarize the assumptions used to generate the rate forecasts.
- 7.10.2 Please discuss any key uncertainties that Creative Energy considers could significantly impact rates in the forecast period.
- 7.11 Please discuss the extent to which Creative Energy considers that significant changes in its rates in the LTRP forecast period would affect its ability to:
- Attract new customers; and
 - Retain existing customers.
- 7.12 Please explain further why Creative Energy considers that price elasticity assumptions are not necessary for the 50% or 100% Growth scenarios.

**8.0 Reference: LOAD FORECAST
Exhibit B-1, p. 21
Peak demand forecast**

In Figure 2 in the Application, Creative Energy provides the following graph showing forecasted peak demand:



On page 21, Creative Energy states:

Without additional capacity investments, Creative Energy expects to be able to meet the peak demand requirements of the system under most growth scenarios for the next ten years, by virtue of the redevelopment project and the additional capacity resulting from the Expo plant.

- 8.1 Please explain whether Creative Energy considers it would be able to meet peak demand requirements if the planning forecast were extended to 20 years.
- 8.2 Please confirm, or explain otherwise, that the incremental peak demand from the 50% and 100% growth scenario cannot be met solely by supply from the proposed electric boiler.
 - 8.2.1 If confirmed, please explain whether the remaining incremental peak demand would be met by Creative Energy’s existing natural gas boilers.
- 8.3 Please discuss whether the City of Vancouver Low Carbon Energy System Policy requires all energy demand for new buildings, including peak demand, to be met by low carbon resources.

C. CAPITAL PROJECTS

**9.0 Reference: CAPITAL PROJECTS
BCUC CPCN Guidelines²
Future Capital Projects**

Section 44.1 of the *Utilities Commission Act (UCA)* states:

“(2) Subject to subsection (2.1), a public utility must file with the commission, in the form and at the times the commission requires, a long-term resource plan including all

² 2015 BCUC CPCN Guidelines, https://www.bcuc.com/Documents/Guidelines/2015/DOC_25326_G-20-15_BCUC-2015-CPCN-Guidelines.pdf

of the following:

.....

(c)an estimate of the demand for energy that the public utility expects to serve after it has taken cost-effective demand-side measures;

(d)a description of the facilities that the public utility intends to construct or extend in order to serve the estimated demand referred to in paragraph (c);”

The BCUC CPCN Guidelines state:

Where they exist, long-term resource plans filed under section 44.1 of the UCA should support CPCN applications. These long-term resource plans may deal with significant aspects of project justification, particularly the need for the project and the assessment of the overall costs and benefits of the project and alternatives to the project. Under section 44.1(9) of the UCA, in approving a long-term resource plan, the Commission may order that a proposed utility plant or system, or an extension of either, is exempt from the requirements of section 45(1) of the UCA.

9.1 Please provide a description of the capital projects, in addition to the low carbon electrification project, that Creative Energy anticipates pursuing to serve the demand described in each load forecast scenario, including any significant maintenance projects, extensions and upgrades. Please include the project rationale, timing, scope and any available cost information.

9.1.1 Please provide an overview of any capital projects, further to those described in response to the above, that Creative Energy intends to pursue over the next 20 years. Please include any significant maintenance projects, extensions or upgrades. Please include the rationale, scope, timeline, and any available cost information for each project.

D. DEMAND SIDE MANAGEMENT

10.0 Reference: DEMAND SIDE MANAGEMENT Exhibit B-1, pp. 4, 22–23, 42–43 Demand-Side Management

On page 23 of the Application, Creative Energy provides a list of residential and commercial uses of the steam/hot water provided by Creative Energy.

On page 42, Creative Energy states:

In the overall context of the service Creative Energy provides, the customer base and how customers use the service, the strong focus on energy efficiency in the City of Vancouver already, the relatively low marginal cost of natural gas to produce steam and Creative Energy’s rate structure, we consider that there are some but likely not many opportunities for cost-effective DSM.

Creative Energy does not have sufficient information at this time to make formal DSM program offers to its customers. Further work is required to identify the opportunities for cost-effective DSM, coordinate with the City of Vancouver’s requirements and initiatives for energy efficiency of new and existing buildings, understand the customer response and the potential energy savings, and required expenditures. Creative Energy’s plan at this time is therefore to advance such work.

On page 43, Creative Energy states:

Creative Energy will be reviewing the declining block rate design that has been in place for many years and considering changes that improve the alignment of rate design to cost drivers, and also to encourage energy conservation and efficiency.

On page 43, Creative Energy also states:

[Creative Energy's] customers operate in different business segments and have somewhat diverse needs and barriers in relation to making changes to reduce steam use. The buildings themselves are diverse also in terms of their age and energy efficiency.

- 10.1 Please provide an estimate of the timeframe required to undertake the further work on demand-side management (DSM) outlined in the preamble.
 - 10.1.1 Please discuss any potential barriers to gathering the sufficient information needed to consider a formal DSM program offer.
- 10.2 Please discuss whether Creative Energy has undertaken any analysis to compare the applicability of DSM measures implemented by other utilities in BC (or elsewhere) with Creative Energy's customer end-uses identified in the Application.
- 10.3 Based on Creative Energy's current understanding of the end-uses and needs of its customers, please discuss whether Creative Energy considers there are any customer segments where there may be particularly significant barriers to offering DSM programs.
- 10.4 Please explain why Creative Energy's rate structure may constrain opportunities for cost-effective DSM.
- 10.5 Please discuss how a potential change in rate design as discussed in the preamble may affect Creative Energy's ability to work towards its 2021 LTRP objectives.

On pages 22 to 23, Creative Energy states:

Overwhelmingly, permanent partial loss of load is due to customers undertaking projects to switch part of their heating energy system from reliance on steam to a lower carbon alternative and/or to add some form of heat recovery to their system. In recent years, nine Creative Energy customers have added some form of heat recovery to their heating system and/or partially switched their system to lower-carbon alternatives. These projects were largely to install heat recovery systems, where heat recovered from cooling systems is used to provide heat or hot water to the building, thus reducing their steam demand. There was at least one project involving geo-exchange in combination with heat recovery.

1) The customers investing in on-site energy projects were all non-residential buildings. This is to be expected as residential buildings typically have lower cooling demands on a unit-area basis, and very limited cooling in shoulder and winter seasons, meaning that there is a much lower degree of coincidence between heating and cooling demands.

2) The buildings experienced a range of success. The percent reduction in steam use observed from metered data following commissioning ranged from 90 percent reduction to zero reduction. Most commonly, customers experienced about a 50 percent reduction in annual steam consumption, largely in the summer months.

- 10.6 Please discuss whether Creative Energy views that offering DSM programs could provide a means of retaining some customers who might otherwise switch part of their heating energy

system from reliance on steam to a lower carbon alternative and/or add some form of heat recovery to their system.

10.6.1 Please discuss any potential advantages or disadvantages of DSM compared to such customer projects.

**11.0 Reference: DEMAND SIDE MANAGEMENT
Demand Side Measures Regulation B.C. Reg. 117/2017,³ Section 3
Creative Energy 2017 LTRP, BCUC Order G-147-17
DSM Regulation - Adequacy Requirements**

Section 3(1) of the Demand Side Measures Regulation (DSM Regulation) states:

A public utility's plan portfolio is adequate for the purposes of section 44.1 (8) (c) of the Act only if the plan portfolio includes all of the following:

(a) a demand-side measure intended specifically

(i) to assist residents of low-income households to reduce their energy consumption, or

(ii) to reduce energy consumption in housing owned or operated by

(A) a housing provider that is a local government, a society as defined in section 1 of the Societies Act, other than a member-funded society as defined in section 190 of that Act, or an association as defined in section 1 (1) of the Cooperative Association Act, or

(B) the governing body of a first nation,

if the benefits of the reduction primarily accrue to

(C) the low-income households occupying the housing,

(D) a housing provider referred to in clause (A), or

(E) a governing body referred to in clause (B) if the households in the governing body's housing are primarily low-income households;

(b) if the plan portfolio is submitted on or after June 1, 2009, a demand-side measure intended specifically to improve the energy efficiency of rental accommodations;

(c) an education program for students enrolled in schools in the public utility's service area;

(d) if the plan portfolio is submitted on or after June 1, 2009, an education program for students enrolled in post-secondary institutions in the public utility's service area;

(e) one or more demand-side measures to provide resources as set out in paragraph (e) of the definition of "specified demand-side measure", representing no less than

(i) an average of 1% of the public utility's plan portfolio's expenditures per year over the

³ Demand Side Measures Regulation B.C. Reg. 117/2017,
https://www.bclaws.gov.bc.ca/civix/document/id/complete/statreg/10_326_2008

portfolio's period of expenditures, or

(ii) an average of \$2 million per year over the portfolio's period of expenditures;

(f) one or more demand-side measures intended to result in the adoption by local governments and first nations of a step code or more stringent requirements within a step code.

Directive 1 of BCUC Order G-147-17 states in part:

...Creative Energy is directed to file a complete and updated LTRP that satisfies all requirements under section 44.1 of the UCA, including Demand-Side Management requirements...

- 11.1 Please confirm, or explain otherwise, that the 2021 LTRP does not include a plan to specifically address the requirements outlined in section 3(1) of the DSM Regulation.
- 11.2 For each of the requirements (a) to (f) outlined in section 3(1) of the DSM Regulation, please discuss whether Creative Energy considers the requirement may be applicable to its service area, based on its existing customer base.

E. RENEWABLE NATURAL GAS

12.0 Reference: RENEWABLE NATURAL GAS Exhibit B-1, pp. 45–46 Renewable Natural Gas

On page 45 of the Application, Creative Energy states:

A potential option to reduce carbon intensity of Creative Energy's steam is to purchase renewable natural gas ("RNG") from FEI to displace conventional natural gas use in Creative Energy's existing steam plant. A portion of the steam produced would be deemed to be low carbon or net zero, and Creative Energy might be able to offer to customers a 'low carbon steam' service option on that basis.

...

A major issue with an RNG option is access to a sufficient volume of RNG over a sufficient period of time to support a low carbon steam service option. We understand that FEI's total RNG supply portfolio at the end of 2024 is forecast to be about 5,000,000 GJ per year, and that demand for RNG may already exceed supply.

On page 46, Creative Energy states:

Creative Energy will continue to evaluate the option of purchasing RNG from FEI to displace natural gas use in Creative Energy's existing steam plant and support a low carbon steam service...

- 12.1 Please explain when Creative Energy has engaged with FortisBC Energy Inc. (FEI) regarding the feasibility of renewable natural gas (RNG) supply, the volumes of RNG supply discussed and the outcome of that engagement.
- 12.1.1 Please discuss when Creative Energy plans further engagement with FEI as part of its LTRP action plan.
- 12.2 Please explain the volume of RNG that Creative Energy would require to meet the anticipated demand for low carbon energy for each year of the term of this LTRP.

- 12.3 Please discuss whether Creative Energy would fall under a low carbon energy systems policy type if it were to use RNG for part of its energy supply.
- 12.4 Please discuss whether Creative Energy views RNG as a supply option primarily for new customers, existing customers or both.
 - 12.4.1 Please discuss the extent to which Creative Energy considers RNG could mitigate the risk of load attrition resulting from customers switching to alternative low carbon resources.
- 12.5 Please discuss if Creative Energy has undertaken any cost evaluation to compare the estimated cost of energy (\$/GJ) supplied from RNG with the cost of energy for the proposed boiler electrification project.
- 12.6 Please confirm, or explain otherwise, that RNG is the only low carbon supply side resource under consideration by Creative Energy in the LTRP, besides the electric boiler project.
 - 12.6.1 Please explain whether Creative Energy has considered any other alternative resource portfolios to address the 50% or 100% growth scenarios as part of its preparation of the 2021 LTRP.
 - 12.6.1.1 If so, please explain why these were not included in the Application.

F. CONSULTATION

- 13.0 Reference: CONSULTATION
Exhibit B-3, pp. 7–9
Creative Energy 2017 LTRP, BCUC Decision and Order G-147-17, p. 3;
BCUC Resource Planning Guidelines, Section 8
Stakeholder Engagement**

On pages 7 to 9 of Exhibit B-3, Creative Energy describes its customer and stakeholder engagement.

Order G-147-17 accompanying the Decision to Creative Energy’s Application for its 2017 LTRP stated on page 3 “the Panel would encourage Creative Energy to undertake public consultation in preparation of the updated LTRP.”

Section 8 of the Resource Planning Guidelines states:

Although utility management is responsible for its resource planning and resource selection process, utilities should normally solicit stakeholder input during the resource planning process... Utilities are encouraged to focus such efforts on areas of the planning process where it will prove most useful and to choose methods that best fit their needs.

- 13.1 Please provide Creative Energy’s view of the areas of the planning process whether stakeholder input is most useful.
- 13.2 Please explain whether Creative Energy solicited any feedback from current customers in the development of its LTRP. If yes, please provide the feedback received to date. If no, please explain why feedback was not solicited.
 - 13.2.1 Please explain whether any current Creative Energy customers have expressed a desire for a low-carbon energy solution provided by Creative Energy. If yes, please explain which customers, the size of their loads, and customers’ understanding of the rate impacts of a low-carbon energy solution.
- 13.3 Please explain whether Creative Energy has engaged with developers or building owners of locations in or near Creative Energy’s current service area regarding their potential interest in

low-carbon energy provided by Creative Energy.

13.3.1 If yes, please discuss the location, anticipated development year and potential size of loads.

13.3.2 If no, please explain why such engagement has not been undertaken.

13.3.3 For the 50% Load Growth and 100% Load Growth scenarios, does Creative Energy have any feedback from developers or building owners to support the load forecast in either of these scenarios? Please explain.

13.4 Please explain whether existing buildings can connect to Creative Energy's current natural gas fired boiler system under current City of Vancouver development rules. If yes, please explain whether Creative Energy expects any load growth from such customers in future, their locations and load sizes.

On page 8 of Exhibit B-3, under the heading "Low Carbon Energy Policy," Creative Energy states: "While energy policy is an external factor to our planning we have engaged with key policy makers to be properly informed of the emergence of current imperatives." Further on the same page, Creative Energy describes its upcoming decarbonization project.

13.5 Please discuss the key policy makers Creative Energy has engaged with on Low Carbon Energy Policy and the imperatives identified.

13.6 Please explain, with rationale, whether Creative Energy is currently pursuing any low carbon energy or decarbonization projects other than RNG and the decarbonization project described in Exhibit B-2.

G. NEXT STEPS

14.0 Reference: NEXT STEPS Filing of the Next LTRP

14.1 Please provide Creative Energy's view of the appropriate timeframe or circumstances for Creative Energy to file its next LTRP with the BCUC.