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February 25, 2019

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

Attention: Mr. Patrick Wruck, Commission Secretary and Manager, Regulatory Support

Dear Mr. Wruck:

Re: FortisBC Inc. (FBC)

Project No. 1598987

Application for a Certificate of Public Convenience and Necessity (CPCN) for the Grand Forks Terminal (GFT) Station Reliability Project (the GFT Reliability Project or Application)

FBC Submission on Further Process

On November 19, 2018, FBC filed the above noted Application. Pursuant to British Columbia Utilities Commission (BCUC) Order G-250-18, FBC filed its responses to round one information requests (IRs) on February 14, 2019. In accordance with the following is FBC's submission on further process. FBC submits that the matter should move to written final argument.

Intervener submissions on process were submitted by British Columbia Municipal Electrical Utilities (BCMEU), the British Columbia Old Age Pensioners' Organization, Active Support Against Poverty, BC Poverty Reduction Coalition, Council of Senior Citizens' Organizations of BC, Disability Alliance BC, and Tenant Resource & Advisory Centre (BCOAPO), the Commercial Energy Consumers Association of British Columbia (CEC), and the Industrial Customers Group (ICG). The BCMEU, BCOAPO, and CEC all submitted that they support moving to final argument.

ICG is the only intervener that has requested a second round of IRs as the next step in this proceeding. ICG is suggesting that it needs a second round of IRs on the alternatives considered in the Application. However, ICG has failed to provide any specific submissions as to what further evidence is required or where the evidence is deficient with respect to the alternatives. As noted below, FBC believes that the evidence to date on the record through the Application and responses to IRs adequately addresses the need for the project, the alternatives considered, and why FBC has proposed the preferred alternative. As such, FBC agrees with BCMEU, BCOAPO, and CEC that the regulatory review process should proceed

to final written argument. FBC believes that there is a fulsome, adequate, and appropriate amount of evidence on the record in this proceeding with which, following written arguments, the BCUC can render a decision. The following is a summary of the evidence which supports FBC's view.

- FBC's Application was complete and clearly explained the alternatives along with FBC's preferred alternative including detailed supporting evidence. The GFT Reliability Project is well within the CPCN threshold and the identified alternatives are straightforward, with the proposed GFT Reliability Project alternative addressing all identified issues and providing the best value for investment over a 40 year analysis period.
- FBC filed reports from ABB and DBS Energy Services Inc., which provide a robust expert review of the condition assessment of existing transformers (GFT T1 and OLI T1) at GFT and transmission lines 9L and 10L respectively.
- One round of information requests (including approximately 250 IRs) from the BCUC and Interveners has provided ample opportunity for questions to be asked and answered. FBC believes that IRs in this proceeding have explored various aspects of the project including alternatives¹ and, therefore, a further round of IRs would simply add to the proceeding costs while adding little or nothing of substance to the record.

Given the above, FBC believes that the evidentiary record is sufficient and that further evidentiary process will not materially aid the Commission in reaching a conclusion in this proceeding. Therefore, FBC strongly supports the proceeding moving to the written final argument phase and proposes the following regulatory timetable.

Action	Date (2019)
FBC Written Final Argument	Friday, March 6, 2019
Intervener Written Final Argument	Friday, March 13, 2019
FBC Written Reply Argument	Friday, March 20, 2019

If further information is required, please contact the undersigned.

Sincerely,

FORTISBC INC.

Original signed:

Doug Slater

cc (email only): Registered Interveners

¹ Over 40 of the IRs related specifically to the project alternatives.