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October 26, 2021

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

Attention: Mr. Patrick Wruck, Commission Secretary

Dear Mr. Wruck:

Re: FortisBC Inc. (FBC)
Project No. 1599231
Annual Review for 2022 Rates (Application)
Response to Workshop Undertakings

On August 6, 2021, FBC filed the Application referenced above. In accordance with British Columbia Utilities Commission Order G-226-21 setting out the Regulatory Timetable for the review of the Application, FBC respectfully files the attached responses to the seven undertakings from the Workshop held on October 20, 2021.

If further information is required, please contact the undersigned.

Sincerely,

FORTISBC INC.

Original signed:

Diane Roy

Attachments

cc (email only): Registered Parties

FortisBC Inc. (FBC)
Annual Review for 2022 Rates Application

UNDERTAKING No. 1

HEARING DATE: Workshop, October 20, 2021

TRANSCRIPT REFERENCE: Volume 1, page 61, lines 8 to 22

WITNESS: Ms. Walsh

QUESTION: Committed to provide the corrected calculation for the tables in the Evidentiary Update for actual wildfire costs in 2017.

RESPONSE:

As stated in the Workshop, FBC discovered an error in the calculation of the 2017 Actual wildfire capital costs subsequent to filing the Evidentiary Update, which requires an update to the calculation of the 2017 Actual wildfire costs presented in Table A-1 to Appendix A of the Evidentiary Update. As a result of the revision to Table A-1, FBC also provides a revised Table A-2 for the calculation of the 2021 Approved wildfire related capital costs and a revised Table A-4 for the calculation of the 2021 Exogenous Factor. Additionally, FBC has discovered a minor error in the embedded O&M calculation which requires a correction to Table A-3. These corrected tables to Appendix A of the Evidentiary Update are provided below.

Further, FBC provides a revised Table 1 to the Evidentiary Update Cover Letter, which provides the 2022 Revenue Requirement Impact of the Evidentiary Update. As shown in the revised Table 1 below, the revised 2022 revenue deficiency is \$13.264 million (compared to a deficiency of \$13.276 million shown in the original Table 1 of the Evidentiary Update Cover Letter). This minor decrease in the revenue deficiency has no impact on the proposed 2022 rate increase of 3.46 percent when rounded to two decimal places.

Revised Table A-1: Historical Wildfire Expenditures 2015 to 2021

Line	Date	Location	BCWS #	Cause	Capital (\$000s)	O&M (\$000s)
1	25 May 2021	Knighthawk	K50645	Person	-	-
2	1 Jul 2021	Merry Creek	N51165	Person	-	-
3	9 Jul 2021	Trozzo Creek	N51705	Lightning	-	-
4	9 Jul 2021	Akokli Creek	N71686	Lightning	-	\$ 23.100
5	11 Jul 2021	Thomas Creek	K51794	Person	-	\$ 2.200
6	19 Jul 2021	Nk'Mip Creek	K52061	Person	\$ 2,199.246	\$ 156.200
7	21 Jul 2021	Barcelo Road	K52095	Person	-	-
8	28 Jul 2021	Boothman Creek	N62234	Person	-	-
9	16 Sep 2021	Mount Nkwala	K52833	Person	-	-
10	Total 2021				\$ 2,199.246	\$ 181.500
11	6 Aug 2020	West Bench	K50962	Person	-	-

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Line	Date	Location	BCWS #	Cause	Capital (\$000s)	O&M (\$000s)
12	17 Aug 2020	Talbot Creek	N51250	Lightning	-	-
13	18 Aug 2020	Christie Mountain	K51287	Unknown	-	\$ 15.000
14	9 Sep 2020	Crystal Creek	N71681	Person	-	-
15	14 Sep 2020	Jura FSR	K61757	Person	-	-
16	29 Sep 2020	East of Old Hedley Road	K61823	Person	-	-
17	Total 2020				-	\$ 15.000
18	24 July 2019	Richter Mountain	K51089	Lightning	\$ 6.200	-
19	4 Aug 2019	Eagle Bludd	K51244	Person	\$ 44.800	-
20	13 May 2019	Richter Creek	K50271	Unknown	-	-
21	Total, 2019				\$ 51.000	-
22	17 Jul 2018	Snowy Mountain	K51238	Lightning	\$ 11.321	-
23	23 Jul 2018	Old Hedley Road	K61422	Unknown	\$ 8.544	\$ 1.500
24	Total 2018				\$ 19.865	\$ 1.500
25	7 Apr 2017	Cawston	K50630	Unknown	\$25.150	-
26	26 Jun 2017	Cawston	K50434	Person	\$44.618	-
27	25 July 2017	Christian Valley	N61324	Person	\$1.400	-
28	4 July 2017	Kaleden	K50588	Unknown	\$37.513	-
29	7 July 2017	Princeton	K60643	Unknown	\$328.061	-
30	24 Aug 2017	Philpott Rd Joe Rich	K51878	Unknown	\$46.666	-
31	Total 2017				\$ 483.408	-
32	8 Jun 2016	Gilpin Park, Grand Forks	N60057	Unknown	\$ 36.760	-
33	Total 2016				\$ 36.760	-
34	13 Aug 2015	Rock Creek ¹	N60584	Person	\$ 1,872.243	-
35	14 Aug 2015	Wilson Mountain	K50619	Unknown	\$ 221.551	-
36	14 Aug 2015	Testalinden Creek ¹	K50615	Unknown	\$ 313.126	-
37	26 Aug 2015	Stickpin (Washington)	n/a	Unknown	\$ 18.211	-
38	Total 2015				\$ 2,425.131	-

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Revised Table A-2: Calculation of 2021 Approved Wildfire Related Capital Costs

Line	Year	Actual (2021 \$)	Reference
1	2017 Actual	523,256	Line 31 of Revised Table A-1 x (1 + 2%) ⁴ Yrs
2	2018 Actual	21,081	Line 24 of Revised Table A-1 x (1 + 2%) ³ Yrs
3	2019 Projected	290,526	Average of 2015 to 2017 actual expenditures in 2021 dollars: 2015 = \$273,261 (Line 38 of Revised Table A-1 less \$2,151,870 recovered through Z-factor for 2015) x (1 + 2%) ⁶ Yrs 2016 = \$36,760 (Line 33 of Revised Table A-1) x (1 + 2%) ⁵ Yrs 2017 = \$523,256 (Line 1 of Revised Table A-2)
4	Total	834,863	Sum of Line 1 to 3
5	2021 Approved	278,288	Line 4 / 3 (Average of 2017-2019 expenditures)

Revised Table A-3: Calculation of 2021 Approved Wildfire Related Formula O&M¹

	2018 Actual	2019	2020	2021
Inflation Factor		2.382%	2.309%	3.668%
Base O&M	1,500	1,536	1,571	1,629

Revised Table A-4: Calculation of 2021 Exogenous Factor

Line	Particular	Capital (\$000s)	O&M (\$000s)	Total (\$000s)	Reference
1	Total 2021 Expenditures	2,199.246	181.500	2,380.746	Revised Table A-1, Line 10
2	Less: Events not meeting Materiality Threshold	-	(25.300)	(25.300)	Revised Table A-1, Sum of Line 4 and 5
3	Costs Meeting Materiality Threshold	2,199.246	156.200	2,355.446	Line 1 + Line 2
4					
5	Less: Total Embedded 2021 Costs under MRP	(278.288)	(1.629)	(279.917)	Revised Table A-2 and A-3
6					
7	Z-Factor Request	1,920.958	154.571	2,075.529	Line 3 + Line 7

¹ While preparing this undertaking response, FBC noticed that an incorrect inflation factor for 2019 was used in the calculation of the 2021 Approved wildfire related formula O&M. The correct 2019 inflation factor is 2.382 percent (as opposed to the 1.481 percent used in the original calculation). The correction to the 2019 inflation factor results in an increase to the 2021 Approved wildfire related formula O&M of \$15 (from \$1,614 to \$1,629). The increase of \$15 has no impact on the proposed 2022 rate increase.

FortisBC Inc. (FBC)
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UNDERTAKING No. 1

Revised Table 1 of Evidentiary Update Cover Letter: 2022 Revenue Requirement Impact of Evidentiary Update

Evidentiary Update - 2022 Rates		
Line Item	Revenue Deficiency /(Surplus) \$ million	Rate Impact (%)
August 6, 2021 Filing	13.295	3.46%
Exogenous factor treatment - Capital	0.132	0.03%
Exogenous factor treatment - O&M	0.155	0.04%
2021 Cost of Removal Error	(0.318)	-0.08%
October 5, 2021 Evidentiary Update	13.264	3.46%

FortisBC Inc. (FBC)
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UNDERTAKING No. 2

HEARING DATE: Workshop, October 20, 2021

TRANSCRIPT REFERENCE: Volume 1, page 64, line 6 to page 65, line 7

REQUESTOR: Chairperson

WITNESS: Ms. Walsh

QUESTION: "...perhaps you can just give me an estimate of what the total 2023 impact is of the two exogenous factors that have been covered? i.e. the MRS report 13, as well as the Nk'Mip wildfire, when it hits 2023 rates what do you estimate that impact to be?"

RESPONSE:

Please refer to the table below which shows that the total 2023 rate impact is estimated to be 0.02 percent when compared to the proposed 2022 rate (or 0.23 percent when compared to the approved 2021 rate) for the two exogenous factors, i.e., MRS Assessment Report No. 13 and the Nk'Mip Creek wildfire.

Line	Particular	2022	2023	Reference
1	Incremental Revenue Requirement (\$000s)			
2	MRS - O&M	765	650	FBC Workshop Presentation, Page 31
3	MRS - Capital	(258)	174	See Note 1 and Note 2
4	Wildfire - O&M	155	-	FBC Undertaking No. 1, Revised Table A-4, Line 7
5	Wildfire - Capital	132	72	See Note 1
6	Total (\$000s)	794	896	Sum of Line 2 to Line 5
7				
8	Revenue at 2021 Approved Rate (\$000s)	383,895	383,895	Evid Update, Oct 5, 2021, Section 11, Schedule 18, Line 7, Col. 5
9	Rate Impact (%) compared to 2021 Approved Rates	0.21%	0.23%	Line 6 / Line 8
10	Year-to-Year Rate Impact (%)	0.21%	0.02%	Line 9: Current Year - Prior Year

Note 1 - Amount is the full impact of revenue requirement due to the capital which includes depreciation, income tax, and earned return

Note 2 - Revenue requirement due to MRS capital in 2022 is a credit due to available CCA tax deduction

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UNDERTAKING No. 3

HEARING DATE: Workshop, October 20, 2021

TRANSCRIPT REFERENCE: Volume 1, page 65, line 11 to 17

REQUESTOR: Mr. Hobbs

WITNESS: Ms. Roy

QUESTION: “In response to ICG 15.2 you refer to AR8 and AR10, and then go on to say that you're not tracking those costs separately anymore, and I'm wondering if you were tracking (inaudible) MRS costs for AR1 through 12 that are in your base O&M. Do you have a separate account for those? And if so, can you provide those in an undertaking?”

RESPONSE:

As indicated by Mr. Klashinsky at the Workshop, FBC tracks all MRS costs under a single cost centre rather than separately on a per assessment basis. FBC's MRS costs are part of the Base O&M, except for Assessment Report No. 13, for which FBC is seeking exogenous factor treatment.

As approved by Order G-166-20, the Base O&M for the MRP was composed of the 2018 Actual O&M inflated to 2019 using an inflation factor of 1.02382, plus adjustments for exogenous and other factors. Specifically for MRS, the Base O&M included the following amounts:

- 2018 Actual O&M was \$2.097 million¹, inflated to 2019 Base O&M of \$2.147 million;² and
- 2019 Exogenous Factor O&M of \$1.540 million.³

These two amounts were added together for a 2019 Base O&M total of \$3.687 million.

The table below shows the 2020 and 2021 amounts embedded in formula O&M for MRS, starting with the 2019 Base O&M amount, and the actual/projected amounts for those years.

<u>(\$ millions)</u>	<u>2020</u>	<u>2021</u>
Prior Year Base	\$ 3.687	\$ 3.772
Inflation Factor	1.02309	1.03668
Formula Amount	<u>\$ 3.772</u>	<u>\$ 3.910</u>
Actual/Projected	<u>\$ 3.689</u>	<u>\$ 3.762</u>

¹ Per the response to BCUC IR1 36.2 in the MRP proceeding.

² \$2.097 million x 1.02382.

³ MRP Application, Table C2-14.

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UNDERTAKING No. 4

HEARING DATE: Workshop, October 20, 2021

TRANSCRIPT

REFERENCE: Volume 1, page 67, line 11 to page 68, line 21

REQUESTOR: Mr. Weafer

WITNESS: Mr. Klashinsky

QUESTION: “The Assessment Report 13 and the slide on page 30, at a high level I would assume Fortis would have been doing some of these things, so this is incremental work. Is the same requirement also put on Fortis Gas and is there any efficiency between the two utilities in implementing these types of cyber security risk steps?”

“So I'm asking whether on the gas side you don't do them because it's not a legal requirement.”

RESPONSE:

FBC confirms that its cost estimate to implement Assessment Report No. 13 is only for the incremental effort required to meet the new or revised standards. When new or revised Mandatory Reliability Standards are implemented, existing controls and processes are considered when determining the incremental effort to adopt the new or revised standards. Therefore, synergies with existing controls and processes are part of the evaluation of effort when implementing any new or revised standard.

As FBC noted at the Workshop, MRS only apply to the Bulk Electric System, such that FortisBC Energy Inc. (FEI) is not required to comply with MRS. However, outside of MRS, cybersecurity practices across FEI and FBC are based on a comprehensive assessment of areas of risk and vulnerability rather than being based on regulatory requirements. The gas control system is more segmented and utilizes less automation than the electrical system. This creates a different risk profile and therefore different control requirements to address these risks. Although supply chain cybersecurity risks are addressed in both Assessment Report No. 13 and the overall cybersecurity risk management program, which includes the gas control system, the types of risks being addressed are different, which results in additional effort to meet the requirements of Assessment Report No. 13 for FBC.

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UNDERTAKING No. 5

HEARING DATE: Workshop, October 20, 2021

TRANSCRIPT

REFERENCE: Volume 1, page 102, line 4 to page 103, line 3; page 126, lines 3 to 5

REQUESTOR: Mr. Oakley

WITNESS: Diane Roy

QUESTION: “And if I could take you to the first one here, it’s the table provided in FortisBCs response to RCIA IR No. 1, question 14.1. And there is a table given that shows the approved versus actual projected capital expenditures, and they’re broken out by category. And I just had one question about the 2021 numbers, so this is I guess still forecast, but the approved number of 23 million 042, and the actual projected is 29 million 148, and just at a high level, could you provide the key drivers of that 6 million dollar -- it’s about a 26 and a half percent increase between actual and projected growth capital?”

“...and just to confirm, this would be net of CIAC, right?”

RESPONSE:

While responding to this undertaking, FBC noticed the table prepared in the response to ICG IR1 12.1, from which the information was carried over to the response to RCIA IR1 14.1, had an excel formula error which resulted in a portion of the 2021 Projected capital additions for the Playmor Substation Rebuild Project under Special Projects and CPCNs to be double counted under Growth Capital. This error resulted in the 2021 Projected capital additions under Growth Capital being overstated by \$5.643 million (\$29.148 million should have been \$23.505 million).

FBC notes this error affects only the 2021 Projected Growth Capital amounts shown in the responses to ICG IR1 12.1, 12.2, and RCIA IR1 14.1. This error does not change the 2021 Projected capital additions shown under Special Projects and CPCNs, and also does not affect the proposed 2022 rates¹.

FBC provides the revised tables for each of the IR responses as mentioned above. As shown in the tables below, the correct variance between 2021 Approved and Projected Growth Capital is approximately \$0.463 million or 2 percent. This variance is primarily due to a small variance in customer additions and the costs to attach new customers between the projected and the original forecast that was approved as part of the MRP Decision.

¹ As explained in the response to ICG IR1 12.1, FBC does not calculate a Projected earnings sharing amount for future years; as such, the Projected capital amounts that affect earnings sharing are also not included in the financial schedules or calculations in the Annual Reviews. The variance between Approved and Actual (once it is known) 2021 Regular capital will be trued-up in 2023 and subject to earnings sharing.

FortisBC Inc. (FBC)
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UNDERTAKING No. 5

Revised Table in ICG IR1 12.1

Line No.	Description	Actual 2020	Approved 2021	Updated Projected 2021	Forecast 2022	Reference
1	Growth Capital	\$ 28.799	\$ 23.042	\$ 23.505	\$ 24.339	Section 11, Schedule 4, Line 2
2	Sustainment Capital	47.325	49.818	50.910	43.110	Section 11, Schedule 4, Line 3
3	Other Capital	16.036	14.712	14.086	14.756	Section 11, Schedule 4, Line 4
4	Total Forecast Capital	<u>\$ 92.160</u>	<u>\$ 87.573</u>	<u>\$ 88.501</u>	<u>\$ 82.205</u>	Section 11, Schedule 4, Line 5
5	Flow-Through Capital	-	-	-	0.935	Section 11, Schedule 4, Line 9
6	Special Projects and CPCNs	23.049	21.938	35.514	19.401	Section 11, Schedule 5, Line 10
7	Total Capital	<u>\$ 115.209</u>	<u>\$ 109.511</u>	<u>\$ 124.015</u>	<u>\$ 102.541</u>	

Revised Table in ICG IR1 12.2

Line No.	Description	Actual 2020	Approved 2021	Updated Projected 2021	Forecast 2022	Reference
1	Forecast Capital Expenditures	\$ 92.160	\$ 87.573	\$ 88.501	\$ 82.205	Section 11, Schedule 5, Line 2
2	Flow-Through Capital Expenditures	-	-	-	0.935	Section 11, Schedule 5, Line 3
3	Total Gross Regular Capital Expenditures	<u>92.160</u>	<u>87.573</u>	<u>88.501</u>	<u>83.140</u>	Sum of Lines 1 and 2
4						
5	Capitalized Overhead	9.330	9.767	9.795	10.177	Section 11, Schedule 5, Line 18
6	AFUDC	0.296	0.542	0.503	0.214	Section 11, Schedule 5, Line 19
7	Change in Work in Progress	(7.636)	5.717	-	-	Section 11, Schedule 5, Line 21
8	Total Regular Additions to Plant	<u>94.150</u>	<u>103.599</u>	<u>98.799</u>	<u>93.531</u>	Sum of Lines 3 through 7
9						
10	<u>Special Projects and CPCN Capital Expenditures</u>					
11	Corra Linn Spillway Gate Replacement	13.122	8.640	13.147	6.019	Section 11, Schedule 5, Line 7
12	Grand Forks Terminal Station	3.545	2.806	2.171		
13	Upper Bonington Old Units Refurbishment	5.732	1.782	1.707		
14	Playmor Substation Rebuild Project	0.650	8.710	8.730	1.297	Section 11, Schedule 5, Line 8
15	Kelowna Bulk Transformer Capacity Addition	-	-	9.759	12.085	Section 11, Schedule 5, Line 9
16	AFUDC	2.032	1.857	1.892	2.158	Section 11, Schedule 5, Line 25
17	Change in Work in Progress	(4.660)	16.612	(9.290)	10.803	Section 11, Schedule 5, Line 21
18	Total Special Projects and CPCN Additions to Plant	<u>20.421</u>	<u>40.407</u>	<u>28.116</u>	<u>32.362</u>	Sum of Lines 11 through 17
19						
20	Total Plant Additions	<u>\$ 114.571</u>	<u>\$ 144.006</u>	<u>\$ 126.915</u>	<u>\$ 125.893</u>	Line 8 + Line 18

FortisBC Inc. (FBC)
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UNDERTAKING No. 5

Revised Table in RCIA IR1 14.1

Line	Description	2020	2021	2022
1	Approved (\$000s)			
2	Growth Capital	\$ 27,029	\$ 23,042	\$ 24,339
3	Sustainment Capital	50,743	50,098	43,110
4	Other Capital	15,752	14,712	14,756
5	Total Forecast Capital	<u>\$ 93,524</u>	<u>\$ 87,852</u>	<u>\$ 82,205</u>
6				
7	Actual/Projected (\$000s)			
8	Growth Capital	\$ 28,799	\$ 23,505	
9	Sustainment Capital	47,325	50,910	
10	Other Capital	16,036	14,086	
11	Total Forecast Capital	<u>\$ 92,160</u>	<u>\$ 88,501</u>	

FortisBC Inc. (FBC)
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UNDERTAKING No. 6

HEARING DATE: Workshop, October 20, 2021

**TRANSCRIPT
REFERENCE:** Volume 1, page 117, lines 20 to 24

REQUESTOR: Ms. Worth

WITNESS: Ms. Price

QUESTION: “And continuing on with the question about PPA, now that the 2020 and 2021 contract period is over, I'm just wondering if there's an update as to the amount of BC Hydro PPA purchases made relative to the contract minimum?”

RESPONSE:

FBC's actual PPA use for the 2020/21 contract year totaled 538.3 GWh, which was 32.8 GWh over the minimum take requirement of 505.5 GWh. Please note the 2020/21 actual PPA use has no impact on the 2021/22 PPA nomination, nor the 2022 Forecast.

FortisBC Inc. (FBC)
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UNDERTAKING No. 7

HEARING DATE: Workshop, October 20, 2021

TRANSCRIPT

REFERENCE: Volume 1, page 119, line 23 to page 121, line 14; page 126, lines 6 to 8

REQUESTOR: Ms. Worth

WITNESS: Ms. Price

QUESTION: “So our IR 20.1 confirms that the forecast water fees for 2022 are based on a forecast generation from FBC plants in 2021. And a projected fiscal 2021 water fees are based on the actual generation from fiscal -- or sorry, from FBC plants in 2020. But the application shows a previous year entitlement for 2022 of 1679 GWh. So 1,679, while the actual projected FBC generation for 2021 per BCOAPO IR 19.1, is only 1603 GWh. So I'm just wondering if you could reconcile those two different figures?”

RESPONSE:

The 2022 Forecast Plant Entitlement of 1,679 GWh, as presented in Table 4-6 of the Application (as reproduced below), is equal to the sum of the 2021 Projected FBC Generation plus CPA Balancing Pool use in Lines 16 and 24 of the table in the response to BCOAPO IR1 19.1, an excerpt of which is reproduced below.

Table 4-6

Line No.	Description	Approved 2021	Projected 2021	Forecast 2022
1	Plant Entitlement in Previous Year (GWh)	1,559	1,558	1,679
2				
3	Water Fees	\$ 10.868	\$ 10.878	\$ 11.958

Excerpt from response to BCOAPO IR1 19.1

Line No.	Total Volume (GWh)	Approved 2021	Projected 2021	Forecast 2022
16	FBC Generation	1,600	1,603	1,608
17	Brilliant	919	921	918
18	BC Hydro PPA	755	520	651
19	Waneta Expansion	-	-	-
20	Market and Contracted Purchases	367	506	413
21	Sale of Surplus Power	-	-	-
22	Independent Power Producers	1	1	1
23	Self-Generators	2	-	-
24	CPA Balancing Pool	8	76	12
25	Transmission Service Loss Recoveries	14	12	12
26	Special and Accounting Adjustments	-	-	-
27	Total	3,664	3,640	3,591

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The 2021 Projected Plant Entitlement of 1,558 GWh, as presented in Table 4-6 of the Application, is equal to the sum of the 2020 Actual FBC Generation plus CPA Balancing Pool use in Lines 16 and 24 within the response to BCOAPO IR1 17.1, an excerpt of which is reproduced below.

Excerpt from response to BCOAPO IR1 17.1

Line No.	Total Volume (GWh)	Approved 2020	Actual 2020
16	FBC Generation	1,579	1,580
17	Brilliant	918	919
18	BC Hydro PPA	650	629
19	Waneta Expansion	-	-
20	Market and Contracted Purchases	438	450
21	Sale of Surplus Power	-	-
22	Independent Power Producers	1	1
23	Self-Generators	5	4
24	CPA Balancing Pool	-20	-22
25	Transmission Service Loss Recoveries	13	13
26	Special and Accounting Adjustments	0	-
27	Total	3,585	3,574