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May 20, 2025

British Columbia Utilities Commission
Suite 410, 900 Howe Street
Vancouver, BC
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Town of Princeton
151 Mermilion Avenue, P.O. Box 670
Princeton, BC
V0X 1W0

Dear Commission Secretary:

Dear Mayor Coyne:

Re: Complaint Regarding FortisBC Inc. (FBC) Public Safety Power Shutoff (PSPS) Policy

FBC Response to the Town of Princeton and the British Columbia Utilities Commission (BCUC)

On May 9, 2025, the BCUC issued a letter to FBC with respect to correspondence received from the Town of Princeton dated May 7, 2025. The Town of Princeton's correspondence included two letters. The first letter was addressed to FBC outlining concerns with respect to the potential effects of the PSPS policy on the Town of Princeton and its residents. The second letter was addressed to the BCUC as a complaint expressing similar concerns and requesting relief from the BCUC. In the BCUC letter, BCUC staff requested that FBC review the correspondence and provide a response to the Town of Princeton and the BCUC by May 19, 2025.¹

FBC respectfully provides the following response to the Town of Princeton and the BCUC.

FBC appreciates the Town of Princeton expressing their concerns regarding FBC's PSPS policy and the potential impacts to their community. The safety of the public, the communities we serve, and our employees who live and work in those communities is our number one priority.

Background and Purpose of PSPS

The new FBC PSPS policy is part of our ongoing efforts to reduce wildfire risk through the implementation of comprehensive wildfire mitigation strategies. FBC is implementing this policy in response to the escalating effects of extreme weather, the impact of recent wildfires, and evolving industry practices. Development and implementation of FBC's PSPS policy is part of FBC's continued evolution of its wildfire mitigation practices and procedures.

¹ Monday, May 19, 2025 is a statutory holiday in British Columbia, therefore, the deadline moves to the next business day, Tuesday, May 20, 2025.

A PSPS event is the proactive de-energization of powerline(s) during periods of extreme wildfire risk, to reduce potential ignition sources, a practice which is being increasingly adopted by electric utilities in North America. FBC has also developed a PSPS protocol which details the threshold weather conditions that would constitute extreme wildfire risk, and sets out the steps to be followed to initiate a PSPS event. The PSPS protocol identifies two key extreme weather metrics with thresholds that, if met concurrently, would trigger the initiation of the PSPS process. These two metrics and their thresholds are:

- 1) sustained wind speeds in excess of 75 km/hour, and
- 2) a Fire Weather Index (FWI)² of greater than 47.

FBC understands and appreciates that customers rely on electricity. PSPS events are a tool of last resort in order to keep communities safe and help prevent wildfires. If extreme weather condition thresholds are met, as part of FBC's PSPS protocol, FBC will consider a number of other factors that may be applicable under the specific circumstances to guide its PSPS decision making throughout the initiation phase of any PSPS event. These considerations will include any alternative wildfire mitigation strategies that have already been taken or can be taken, any relevant Environment Canada weather alerts, and input from public safety partners, local and provincial governments, Indigenous communities and critical infrastructure providers, where available.

With respect to any initiation of a PSPS event when extreme weather thresholds are met, FBC will have various stages and multiple levels of communication to ensure those impacted are informed and can prepare. This includes public safety partners, local and provincial governments, the BCUC, Indigenous communities, critical infrastructure providers, and impacted FBC customers. FBC plans to provide comprehensive notification when the forecast calls for extreme weather conditions that are expected to meet FBC's PSPS event initiation thresholds. For example, FBC plans to begin its notification process 72 hours prior to the time the extreme weather conditions are forecast to occur, followed by multiple communication updates at 48 hours, 24 hours, and 4 hours prior to forecast conditions.³ FBC operations will continuously monitor conditions and will also update those impacted if the initiation of a PSPS event is cancelled. In addition to direct communication, FBC will also provide updates and service alerts on its website throughout the initiation of a PSPS event, during a PSPS event, and through to service restoration from a PSPS event.

² Natural Resources Canada describes the Canadian Forest Fire Weather Index (FWI) system as consisting of six components that account for the effects of fuel moisture and weather conditions on fire behaviour. The first three components are fuel moisture codes, which are numeric ratings of the moisture content of the forest floor and other dead organic matter. Their values rise as the moisture content decreases. There is one fuel moisture code for each of three layers of fuel: litter and other fine fuels; loosely compacted organic layers of moderate depth; and deep, compact organic layers. The remaining three components are fire behavior indices, which represent the rate of fire spread, the fuel available for combustion, and the frontal fire intensity; these three values rise as the fire danger increases. [Canadian Wildland Fire Information System | Canadian Forest Fire Weather Index \(FWI\) System](#).

³ FBC's notification plans may be impacted by factors such as the amount of advanced warning it receives from weather forecasts due to the rapid onset of weather patterns.

Obligation to Serve

FBC takes its obligation to serve seriously. However, section 38 of the *Utilities Commission Act* (UCA) does not suggest that a utility must provide uninterrupted service to customers at all times. Rather, section 38 of the UCA puts obligations on the utility to provide, and maintain its property and equipment in a condition to enable it to provide, a service that the BCUC considers is in all respects adequate, safe, efficient, just and reasonable. While FBC always endeavours to provide safe and reliable service to customers, it cannot guarantee that service will never be interrupted. FBC's Electric Tariff⁴ contemplates that from time to time there will be interruptions (Section 10.1 – Interruptions and Defects in Service) or suspensions of service (Section 10.2 – Refusal of Service and Suspension of Service). In particular, Section 10.2.1 (Suspension of Service for Safety, Repairs or Maintenance) of FBC's Electric Tariff addresses the circumstances of a PSPS event, as it provides that FBC may suspend service "whenever necessary to safeguard life or property" and will provide "reasonable notice" of the suspension as the circumstances permit.

FBC's system has experienced interruptions to its service in the past for various reasons, including planned outages for maintenance and unplanned outages for repairs or maintenance due to, for example, weather events (storms, wind, lightning, floods, fires, etc.), motor vehicle accidents, and third-party damage. As service interruptions do occur from time to time, in order to ensure that FBC continues to provide a service that the BCUC considers in all respects to be adequate, safe, efficient, just and reasonable, FBC has been reporting on its reliability metrics for many years as part of its Service Quality Indicators.⁵

Potential Frequency of PSPS

FBC acknowledges the importance of providing reliable electricity service and recognizes the impacts of interruptions to electricity service, no matter the cause. FBC also acknowledges that the impacts and potential hardships to our customers, individuals, businesses, and the community, as described by the Town of Princeton in their letters, could materialize as a result of frequent and prolonged outages, irrespective of whether they are planned or unplanned. However, FBC anticipates that a PSPS event would be rare. A PSPS event is a tool of last resort, triggered only during periods where extreme wildfire risk and high sustained wind speeds are forecast.

In order to provide some context into the potential frequency that FBC may initiate a PSPS event, FBC reviewed the historical extreme weather events in those areas identified as having the greatest wildfire risk over the past 10 years, and found one occurrence of weather conditions that would have met the criteria set out in FBC's current PSPS protocol over this 10-year period. Therefore, it is FBC's view and hope that the circumstances which would trigger the initiation of the PSPS process will not occur frequently.

FBC's PSPS policy is an additional tool to assist in protecting public safety during wildfire season and is an evolution of our practices that complement our infrastructure, fire mitigation efforts, and emergency coordination, which all help to minimize the need for such PSPS events.

⁴ [fortisbcelectrictariff.pdf](#).

⁵ Most recently approved by the BCUC in its Decision and Order G-70-25 on FBC's 2025-2027 Rate Setting Framework <https://www.ordersdecisions.bcuc.com/bcuc/orders/en/522678/1/document.do>.

Summary

FBC will also be filing its PSPS policy and protocol under separate cover, pursuant to BCUC Order G-115-25, Directive 3.

FBC appreciates the Town of Princeton's efforts to express its concerns regarding FBC's PSPS and the opportunity to provide more detail on its PSPS policy to help to address some of these concerns. FBC looks forward to continuing to engage with the Town of Princeton and other stakeholders while the BCUC continues its review.

If further information is required, please contact the undersigned.

Sincerely,

FORTISBC INC.

Original signed:

Sarah Walsh

cc (email only): The Town of Princeton (scoyne@princeton.ca; ckassa@princeton.ca)