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September 24, 2020

Commercial Energy Consumers Association of British Columbia  
c/o Owen Bird Law Corporation  
P.O. Box 49130  
Three Bentall Centre  
2900 – 595 Burrard Street  
Vancouver, BC  
V7X 1J5

Attention: Mr. Christopher P. Weafer

Dear Mr. Weafer:

**Re: FortisBC Energy Inc. (FEI)**

**Project No. 1599112**

**Application for Approval of the System Extension Fund on a Permanent Basis  
(the Application)**

**Response to the Commercial Energy Consumers Association of British  
Columbia (CEC) Information Request (IR) No. 1**

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On June 29, 2020, FEI filed the Application referenced above. In accordance with BCUC Order G-198-20 setting out the Regulatory Timetable for the review of the Application, FEI respectfully submits the attached response to CEC IR No. 1. The IR responses reflect the evidentiary update filed concurrently with these responses.

If further information is required, please contact Jason Wolfe, Director, Energy Solutions at 604-592-7516.

Sincerely,

**FORTISBC ENERGY INC.**

***Original signed:***

Diane Roy

Attachments

cc (email only): Commission Secretary  
Registered Parties



FortisBC Energy Inc. (FEI or the Company) System Extension Fund (SEF) Pilot Program Compliance Filing and Application for Approval of the SEF on Permanent Basis (Application)	Submission Date: September 24, 2020
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1 1. Reference: Exhibit B-1, page 2

2.2 *SEF CONTINUES TO BE NEEDED FOR EQUITABLE ACCESS TO NATURAL GAS*

FEI believes that the need for the SEF and the benefits it provides remains; that homeowners who are located outside of the dense urban core of FEI's service territory often face much higher costs to access natural gas service and that the SEF program should be made permanent to continue to address this inequity going forward. Since inception of the SEF pilot program, 541 customers have received funding from the SEF, allowing them to benefit from being able to connect to the natural gas system when they otherwise might not have been able to do so. Not only have these new customers benefited from their natural gas service, all of FEI's natural gas customers have also benefited from the increased volume throughput from

these new customers, making the overall system more economic and efficient for all customers.<sup>6</sup> FEI believes that approving the SEF program on a permanent basis will provide these benefits on a continuing, consistent, more equitable, and sustained basis for all customers.

2

3 1.1 Please provide quantification for how FEI's remaining natural gas customers  
4 have also benefited from the increased volume.

5

6 **Response:**

7 Over the 2017 to 2019 period, SEF helped 544 new customers attached to natural gas system.  
8 These customers generate more throughput on the system and sales volumes which serve to  
9 reduce overall system costs for all customers. In addition, the new main extensions have many  
10 more years of service life during which they will pick up additional load from any subsequent  
11 customers who attach to the mains in later years. More volume throughput on the system  
12 means better utilization of the overall system and greater sales volumes means that the annual  
13 fixed costs to operate the system are distributed across a higher volume of throughput  
14 (gigajoules or GJs), which lowers the overall system costs to customers (cost per GJ).

15 As FEI indicated in its updated Rate Impact Analysis (RIA) Report, a 3-year period is a  
16 particularly short period of time to use to assess the benefits of system extensions. As such, it  
17 is too early in the service life of these new mains to attempt to quantify the benefits to other  
18 customers. The mains are, on average, only approximately 1.5 years old and have not had time  
19 to realize the load growth that may occur over the initial 5 or 10 year forecasting periods, nor  
20 over their full service lives. Even with that proviso, the table included in the response to BCSEA  
21 IR1 2.3 shows that based on the RIA performed for SEF participants alone, the throughput  
22 benefits from the SEF recipients during the pilot has already offset the rate impact from the  
23 costs.

24

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1    **2.    Reference:    Exhibit B-1, page 4**

Over the period of 2017 through 2019, FEI added approximately 18,700 residential customers in the Vancouver area and, while main extensions do occur, there were only 119 customers who were required to pay a contribution (CIAC) and who fit the SEF eligibility criteria. That is, only 0.6 percent ( $119/18,700 = 0.006$ ) of all the residential customer additions during that three-year period in the dense Vancouver area, paid a contribution toward a main extension. It is notable that fully 100 of these 119 customers came from the conversion of a single strata complex in 2017. As such, based on the three years of data, a reasonable conclusion is that the majority of homeowners in the dense urban areas around Vancouver typically are not required to pay a contribution for a main extension when they request to connect to the natural gas system. This is because either their main extension can proceed without a contribution or a main already exists near their home and they need only a service line to connect.

Conversely, when considering the connection costs for all the homeowners outside of the Vancouver area who qualified for the SEF pilot program, including all those who accepted the offer as well as those who declined it, FEI's data shows that these customers faced considerably higher required contributions. Table 1 below presents this data.

**Table 1: Average CIACs outside the Vancouver Area**

<b>Year</b>	<b># of Qualified Homeowners</b>	<b>Average CIAC</b>
<b>2017</b>	270	\$ 7,540.00
<b>2018</b>	267	\$ 6,690.00
<b>2019</b>	257	\$ 5,870.00
<b>Overall</b>	<b>794</b>	<b>\$ 6,710.00</b>

All homeowners in Table 1 above required a main extension to access the natural gas system and all were required to pay a contribution (CIAC) before the installation and connection work could proceed. The overall average CIAC for this group of 794 participants and non-participants is a little over \$6,700 toward their new main extension. Given both the number of homeowners and the average cost of the required contributions in the data set, the reasonable conclusion that can be drawn is that homeowners outside of the Vancouver area often face a significant cost to access the natural gas system. This is in contrast to customers in and around Vancouver who, as noted above, most often do not pay a contribution towards a main extension to access gas service. Given this disparity, FEI believes the SEF program continues to have a role to play to help create greater equity within FEI's service territory.

2

3

4

2.1 Please confirm that the above table represents all those homeowners who were eligible and not only those homeowners who applied for SEF assistance.

5

6

2.1.1 If not confirmed, please explain and provide quantification of the number of customers who may have qualified but did not apply.

7



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1 **Response:**

2 The numbers in the above table represent all instances in FEIs data set of potential customers,  
3 located outside of the Vancouver area, who were eligible to receive SEF funding, whether they  
4 ultimately chose to accept or decline the offer of funding assistance.

5  
6

7

8 2.2 FEI provides the total number of additions in the Vancouver area (18,700)  
9 demonstrating that only 0.6% of customer additions paid a contribution toward a  
10 main extension. Please provide the total additions in the areas outside  
11 Vancouver and the % of customer additions that paid a contribution toward a  
12 main extension.

13

14 **Response:**

15 The comparable number of customer additions outside of the Vancouver area was  
16 approximately 34,400 customers. During this time, the approximate number of residential  
17 customers who paid for a main extension was 319. To this total should be added the 363  
18 homeowners who were presented with a CIAC, declined to participate in the SEF, and did not  
19 proceed with a main extension. This produces a total of  $319 + 363 = 682$ , and a ratio of  $682 /$   
20  $34,400 = 2$  percent, or nearly 3 times the rate noted within the Vancouver area.

21 However, in making the comparison of the Vancouver area to other areas of FEI's service  
22 territory, it is notable that 100 of the 119 customers in the Vancouver area came from a single  
23 main extension to serve a strata complex. No such situation exists in the data for outside of the  
24 Vancouver area. Therefore, a more comparable number may be based on 20 main extensions<sup>1</sup>  
25 requiring CIACs in the Vancouver area, versus 682 elsewhere. From this perspective, the ratio  
26 of main extensions to customer additions in the Vancouver area is  $20 / 18,700 = 0.1\%$ . Thus  
27 the rate outside of the Vancouver area is  $2\% / 0.1\% = 20$  times that noted within the Vancouver  
28 area.

29

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<sup>1</sup> In the Vancouver area, 19 customers each requested a main extension for their homes and had to pay a CIAC. In addition 1 strata complex requested a main extension to serve 100 homes and also had to pay a CIAC. The total number of customers who paid a CIAC is therefore  $19+100 = 119$ . Conversely, the total number of main extensions is  $19 + 1 = 20$ .



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1    **3.    Reference:    Exhibit B-1, page 5**

The SEF was intended to reduce the financial barrier faced by some homeowners wishing to connect to the gas system and thus to treat customers in a more equitable manner. Some homeowners are located further from an existing main than most customers, and are, therefore, required to pay a higher CIAC in order to obtain natural gas service. In other circumstances the SEF was seen as a way to reduce the cost barrier and see a main extension reach a small group of customers (a cul de sac for example). While the SEF pilot program has assisted many customers by offsetting the cost of their main extension, for many other homeowners the assistance has either been insufficient, or the structure of the program has produced an unintended obstacle in their desire to connecting to gas. In either case, the needed assistance has not been effectively provided. This is more fully explained below.

Currently the SEF provides eligible participants with funding assistance of up to 50 percent of the CIAC to a maximum of \$10 thousand per participant.

2

3            3.1    Please confirm that the utility has no regulatory obligation to attach uneconomic  
4            customers.

5

6    **Response:**

7    Under the UCA section 28(1), the utility has a regulatory obligation to provide service to the  
8    premises if it is within 200 meters of its supply line. Under section 29, in relation to premises  
9    over 200 meters away, the utility is subject to the requirement “(b) to make extensions and  
10    install necessary equipment and apparatus on terms the commission directs, which terms may  
11    include payment of all or part of the cost by the applicant.”

12    All new requests for main extensions, regardless of length or proximity to a home will follow  
13    FEI’s System Extension Policies, which are set out in Section 12 of FEI’s General Terms and  
14    Conditions of its Tariff. FEI uses its main extension test (MX Test) to determine whether or not  
15    a potential customer must pay a CIAC in order to for a main extension to proceed, and if so in  
16    what amount.

17    The MX Test does not identify whether or not particular customers or main extensions are  
18    economic. The economics of a main extension can only be made after a significant portion of  
19    the economic life of the main has elapsed. FEI uses the Rate Impact Assessment ex post to  
20    determine, at a point in time, if revenues on a main exceed costs.

21

22

23

24            3.2    Does the ‘up to 50%’ mean that 50% is always offered, up to the \$10,000  
25            maximum, or are there other criteria or judgements used in determining the  
26            appropriate % of funding is made available? Please explain.

27



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1 **Response:**

2 Confirmed, the 50 percent of the CIAC is always offered, up to the \$10,000 maximum SEF  
3 funding per applicant.

4







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1                   4.2.1    Please provide quantification of percentages for each reason for  
2   declining the funding.

3  
4    **Response:**

5    Please refer to the responses to BCUC IRs 6.1 and 6.4.

6  
7

8  
9                   4.3     The CEC would like to have an understanding of the dollar threshold levels which  
10   appear to have prevented customers from proceeding with their system  
11   extension. Please provide a brief discussion.

12  
13   **Response:**

14   Please refer to the response to BCUC IR1 6.1.1.

15  
16

17  
18                   4.3.1    For those customers who declined funding, please provide the  
19   distribution of customers and the \$ value of the CIAC that was required  
20   from the customer.

21  
22   **Response:**

23   Please refer to the response to BCUC IR1 6.1.1.

24  
25

26  
27                   4.3.2    For those customers who declined funding, please provide, in table  
28   form, the number of customers, the mean, the median and the range of  
29   CIAC that was required by the customer on a second line, the mean,  
30   median and range of funding that was offered.

31  
32   **Response:**

33   Please refer to the response to BCUC IR1 6.1.1.

34  
35





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4.3.3 For those customers who accepted funding, please provide the distribution of customers and the \$ value of the CIAC that was required from the customer.

**Response:**

Please refer to the response to BCUC IR1 6.1.1.

4.3.4 For those customers who accepted funding, please provide, in table form, the number of customers, the mean, the median and the range of CIAC that was required by the customer on a second line, the mean, median and range of funding that was offered.

**Response:**

Please refer to the response to BCUC IR1 6.1.1.

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1    **5.    Reference:    Exhibit B-1, page 6**

**3.3    PROPOSED CHANGE**

FEI is proposing that the SEF program be made permanent, with a simple change to the SEF framework that FEI believes will create a more equitable outcome between homeowners who live in the dense urban area around Vancouver relative to other homeowners who represent typical SEF potential participants.

When the SEF was proposed, FEI believed that participants in the pilot would, by 2020, be effectively using the full amount of the \$1 million annual budget to address the inequity as described in Section 2.2. As can be seen by the results in Table 2, this has not been the case.

The current funding structure, which contributes 50 percent of the CIAC of eligible participants, does not work well at creating greater equity for homeowners who are located further from an existing main (typically in areas outside of Vancouver). For those homeowners, the funding assistance from the SEF has been frequently rejected as being insufficient because even with the financial assistance, many homeowners still have a significant CIAC to pay, unlike homeowners in Vancouver and the surrounding communities who typical do not need to pay a CIAC for a main extension to access natural gas.

2  
3            5.1    Please provide FEI's view of a 'more equitable outcome between homeowners'  
4                    when there are differing costs between those homeowners, and relate to the  
5                    ratemaking principles of fairness and cost causation.  
6

7    **Response:**

8    With respect to the ratemaking principle of fairness, as discussed in the response to BCUC IR1  
9    1.1, the goal or objective of the SEF program is to promote greater equity in the cost for new  
10    customers to connect to the natural gas distribution system. The data collected during the pilot  
11    period shows that for potential new customers located farther from the system, the cost of their  
12    contribution to connect is significantly higher compared to customers who happen to be located  
13    closer to an existing main, even with funding from the SEF pilot program as originally designed.  
14    FEI is proposing to amend the funding rule to 95 percent in order to reduce the cost disparity  
15    that arises among new customers connecting to the system due to their location within FEI's  
16    service territory.

17    While connecting a new customer who is located farther from the nearest main does cost more,  
18    similar geographic differences exist for many types of costs recovered through FEI's customer  
19    rates. The principle of postage stamping accepts these differences in favour of similar  
20    treatment throughout the utility service territory, as discussed in the response to BCUC IR1 1.2.

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1    **6.    Reference:    Exhibit B-1, page 7**

**Table 3: Comparison of CIACs in Vancouver Area vs. Outside Vancouver Area with the SEF  
Portion Amended as Proposed to up to a maximum of 95%**

Participant location	Required CIAC	SEF Portion	Homeowner Portion
Vancouver Area	Approx. \$0	\$0	\$0
Non Vancouver Area	\$ 6,710	\$ 6,375	\$ 336

As can be seen by Table 3, if FEI's proposed amendment to the SEF to allow up to 95 percent funding contribution to the CIAC were approved, the average homeowner's portion to the connection cost would be reduced to \$336 in less dense areas service areas of the province, bringing it in much closer alignment with homeowners costs in the dense Vancouver area. This amendment would address the primary concern as expressed by eligible SEF pilot program participants who declined to proceed with their main extension and connection to FEI's natural gas system.

For clarity, in addition to requesting approval of the SEF program on a permanent basis, FEI is proposing only this single amendment to the SEF funding rules. The following table provides a summary of the current SEF pilot program framework and funding roles along with identifying the proposed change.

2

3

6.1    Did FEI consider any percentage other than 95%, such as 60% or 75%?

4

6.1.1    If yes, please provide the percentages considered and the rationale for selecting 95% as the appropriate portion. Please provide quantification of any evidence FEI has supporting the 95% as the appropriate number.

5

6

7

8

6.1.2    If no, please explain why not.

9

10    **Response:**

11    Please refer to the response to BCUC IR1 7.2.

12

13

14

15

6.2    Would FEI find it acceptable to change the percentage to 70% instead of 95%? Please explain.

16

17

18    **Response:**

19    While any increase above the 50 percent funding rule in the SEF pilot program would be beneficial to customers, FEI believes that 70 percent funding would still result in costs being prohibitively high for some customers. It would be less effective in addressing the objectives of

21



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1 the program, including to promote equity among customers connecting to the gas system in  
2 various parts of FEI's service territory.

3 FEI expects that, based on customer feedback, the smaller the proportion of the CIAC paid for  
4 by the SEF, the more likely that potential customers will still not proceed with a main extension.  
5 For example, using the same forecast assumptions as provided in the response to BCUC IR1  
6 7.5, if the funding rule was set to pay 70 percent of the CIAC, FEI expects that approximately 35  
7 fewer homeowners would accept the offer of SEF assistance leaving 40 to 50 percent of the  
8 programs annual \$1 million amount still available. While in theory one could reduce the SEF  
9 available amount to \$500-\$600 thousand to reflect a lower level of disbursements, FEI explains  
10 in response to CEC IR1 7.4 why this would not be consistent with the objectives of the program.  
11 Moreover, as discussed in the response to BCUC IR1 7.5, the regulatory treatment that FEI  
12 intends to use will involve a true-up so that even if the annual SEF funds granted are less than  
13 the \$1 million available, customers are kept whole. Therefore, FEI concluded that 95 percent  
14 SEF funding towards a customer's CIAC, as proposed, is the appropriate amount which  
15 supports the program objectives. It is also most likely to use the \$1 million available amount  
16 annually without the funds being depleted early in a year.

17





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1           7.3     To the extent that the annual funding requests could exceed \$1 million, how  
2                     would FEI expect to avoid 'using up' all the \$1 million of the fund towards the  
3                     beginning of year?  
4

5     **Response:**

6     Please refer to the response to BCUC IR1 7.5 for FEI's forecast of SEF utilization. FEI  
7     recognizes that, depending on the number of new customers proceeding with a main extension  
8     project and the amount of SEF funding each qualifies for, the SEF funding requests could  
9     exceed the available \$1 million in any given year. However, FEI believes that such a situation, if  
10    it is to occur, is more likely to happen closer to the end of a year. If that was the case, FEI may  
11    be able to work with these SEF participants to determine if some main extension projects could  
12    be delayed to the following year when additional funding becomes available. In any event, if  
13    permanent approval of the SEF program is granted, FEI will continue to report to the BCUC on  
14    performance of the program in its annual Main Extension report and will include discussion on  
15    any such concerns or issues that may emerge. Additionally, FEI may apply for amendments to  
16    the program design or rules in future if needed.

17  
18  
19  
20           7.4     To the extent that the annual funding requests is significantly lower than \$1  
21                     million, would FEI accept a cap at a lower level? Please explain and provide  
22                     quantification for an appropriate cap lower than \$1 million.  
23

24     **Response:**

25    FEI sees the SEF as a valuable program for customers, and that the funding should continue to  
26    be available at the current level. FEI believes that the information available supports  
27    maintaining the current \$1 million of available funding, while adjusting the funding rules to  
28    reduce the cost barrier that has impeded take-up for the areas of the province that are more  
29    distant from supply lines.

30    As discussed in the response to BCUC IR1 6.1, cost was cited by all of the qualifying  
31    households that did not pursue an extension after finding out the final CIAC amount after  
32    accounting for the SEF. FEI believes that the proposed funding rule change will increase the  
33    likelihood that qualifying households will decide to connect, which is more consistent with the  
34    SEF program objectives of increasing equity among customers across FEI's service territory  
35    than leaving the cost barrier in place and reducing the available SEF funding to reflect the sub-  
36    optimal result.

37    Finally, as discussed in the response to BCUC IR1 7.5, FEI believes that increasing the funding  
38    rule to contribute up to 95 percent of the CIAC will significantly improve the performance of the  
39    SEF program, will likely use all of its \$1 million available funding annually, and the regulatory





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- 1 treatment that FEI intends to use will involve a true-up so that even if the annual SEF funds
- 2 granted are less than the \$1 million available, customers are kept whole.
- 3

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1 **8. Reference: Exhibit B-1, pages 6-7 and 7-8**

such as those in higher density areas. In other words, if homeowners in Vancouver typically do not have to pay a CIAC to obtain natural gas service, the participants in the SEF program who typically reside in communities outside of the Vancouver area should similarly not be faced with a significantly greater financial burden. In order to bridge this CIAC gap, FEI is proposing to amend the SEF framework and funding rules to contribute up to 95 percent of the CIAC for qualifying participants to better achieve the objective of more equitable access to natural gas across FEI's service areas. In order to illustrate how the proposed amendment achieves better

equity among new customers connecting to the natural gas system, Table 3 below provides a comparison of the average CIACs required over the SEF period for new customers in the dense Vancouver area in contrast with the CIACs required in the less dense areas (as shown in Table 1), if the SEF portion is increased to allow the SEF to contribute up to 95 percent of the required CIAC, as proposed.

**Table 3: Comparison of CIACs in Vancouver Area vs. Outside Vancouver Area with the SEF Portion Amended as Proposed to up to a maximum of 95%**

Participant location	Required CIAC	SEF Portion	Homeowner Portion
Vancouver Area	Approx. \$0	\$0	\$0
Non Vancouver Area	\$6,710	\$6,375	\$336

As can be seen by Table 3, if FEI's proposed amendment to the SEF to allow up to 95 percent funding contribution to the CIAC were approved, the average homeowner's portion to the connection cost would be reduced to \$336 in less dense areas service areas of the province, bringing it in much closer alignment with homeowners costs in the dense Vancouver area. This amendment would address the primary concern as expressed by eligible SEF pilot program participants who declined to proceed with their main extension and connection to FEI's natural gas system.

2

**Table 4: Summary of SEF Pilot Program Rules and Proposed Amendment**

Current Program	Proposed Amendment
<b>Eligibility</b>	
Applicant must be a homeowner	No change
Must be single family home or townhome	No change
Home must be a principal residence	No change
PI must be between 0.2 and 0.8	No change
Cannot participate in Contributory Main model	No change
<b>Total Funding Amount</b>	
Capped at \$1 Million per year	No change
<b>Funding Rules</b>	
SEF pays: 50% of CIAC to a maximum of \$10,000 per customer	SEF pays: 95% of CIAC to a maximum of \$10,000 per customer

3



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The proposed change to the funding rules will provide SEF participants with greater assistance and leave them with a CIAC which approximates the experience of customers in the dense area surrounding Vancouver. This modification will result in better achievement of the objective and

purpose of the SEF, to create more equitable access to natural gas, by enabling more eligible homeowners to benefit from the additional energy option, particularly those in locations that often come with high-cost main extensions as a requirement to connect.

1

2           8.1     Please confirm that there are commercial customers wishing to connect that also  
3                   face 'inequitable' CIAC costs relative to other customers.

4

5     **Response:**

6     There are commercial customers wishing to connect to the natural gas system that face CIAC  
7     costs. In fact, over the 2017 to 2019 period, FEI attached approximately 2,900 new commercial  
8     customers in the high density area around Vancouver, and approximately 3,100 customers  
9     elsewhere in its service territory.

10    Of these new commercial customers, in the Vancouver area, approximately 20 main extensions  
11    required a CIAC, which is about 0.7 percent of the new commercial attachments in this area.  
12    The average CIAC of these mains extensions was approximately \$8,000.

13    Outside of the Vancouver area, approximately 40 main extensions required a CIAC, which is  
14    about 1.3 percent of the new commercial attachments in this area. The average CIAC of these  
15    main extensions was approximately \$12,000. This average, however, is heavily skewed by one  
16    main extension in 2019 that required a CIAC of approximately \$200,000. If that main extension  
17    is excluded, the average CIAC outside of the Vancouver area is approximately \$7,700, which is  
18    very similar the average CIAC noted in the Vancouver area.

19    Based on the data from 2017 to 2019, there can be unusually high CIACs faced by certain  
20    commercial customers, but on average, commercial customers throughout FEI's service territory  
21    face very similar CIACs.

22    While FEI is not opposed to a making SEF funding available for commercial customers<sup>2</sup>, the  
23    current SEF program was designed and approved for residential customers. At this time, FEI is  
24    not proposing amendments to the SEF program to expand eligibility to include commercial  
25    customers and has no current plans to develop a pilot program for commercial customers. FEI  
26    believes that a separate commercial SEF program would need to be designed with separate  
27    funding and rules in order to be feasibly implemented.

28    As discussed in the 2015 System Extension proceeding, large commercial customers can have  
29    high energy needs and given their consumption requirements, a CIAC is often not required.  
30    Additionally, smaller commercial customers often rent or lease space in buildings that have

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<sup>2</sup> As discussed in the response to CEC IR1 47.4 in the 2015 System Extension proceeding.



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1 already been connected to an energy source by the developer or building owner. Further,  
2 commercial customers can factor connection CIAC costs into their costs of operating and  
3 recover those costs from their customers through the price of their goods or services.

4  
5

6

7 8.2 Please provide a brief discussion, with quantification to the extent possible, of the  
8 CIAC costs facing commercial enterprises within and outside the lower mainland.

9

10 **Response:**

11 Please refer to the response to CEC IR1 8.1.

12

13

14

15 8.3 When would it be appropriate for FEI to develop a pilot for commercial  
16 enterprises? Please explain

17

18 **Response:**

19 Please refer to the response to CEC IR1 8.1.

20

21

22

23 8.4 How could it be structured such that some of the unused funds in the residential  
24 pilot could be used to make contributions for commercial enterprises wishing to  
25 connect? Please discuss.

26

27 **Response:**

28 Please refer to the response to CEC IR1 8.1.

29