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February 18, 2021

British Columbia Public Interest Advocacy Centre  
Suite 803 470 Granville Street  
Vancouver, B.C.  
V6C 1V5

Attention: Ms. Leigha Worth, Executive Director

Dear Ms. Worth:

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

**Project No. 1599129**

**Application for a Certificate of Public Convenience and Necessity (CPCN) for the Pattullo Gas Line Replacement Project (the Application)**

**Response to the British Columbia Public Interest Advocacy Centre representing the British Columbia Old Age Pensioners' Organization, Active Support Against Poverty, Disability Alliance BC, Council of Senior Citizens' Organizations of BC, and the Tenant Resource and Advisory Centre *et al.* (BCOAPO) Information Request (IR) No. 2**

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On August 31 2020, FEI filed the Application referenced above. In accordance with the British Columbia Utilities Commission Order G-350-20 setting out a further Regulatory Timetable for the review of the Application, FEI respectfully submits the attached response to BCOAPO IR No. 2.

If further information is required, please contact the undersigned.

Sincerely,

**FORTISBC ENERGY INC.**

***Original signed:***

Diane Roy

Attachments

cc (email only): Commission Secretary  
Registered Parties



FortisBC Energy Inc. (FEI or the Company) Application for a Certificate of Public Convenience and Necessity for the Pattullo Gas Line Replacement Project (Amended Application)	Submission Date: February 18, 2021
Response to British Columbia Public Interest Advocacy Centre representing the British Columbia Old Age Pensioners' Organization, Active Support Against Poverty, Disability Alliance BC, Council of Senior Citizens' Organizations of BC, and the Tenant Resource and Advisory Centre <i>et al.</i> (BCOAPO) Information Request (IR) No. 2	Page 1

1   **1.0   Reference:   Exhibit B-7, BCOAPO IR 1.1**

2       The response to the referenced IR includes the following:

3       *A specific circumstance under which FEI would be financially responsible for a cost over-*  
4       *run would be where unknown or unexpected subsurface and underground conditions are*  
5       *discovered. For example, where the contractor encounters rock, cobble, or boulders or*  
6       *unanticipated third party utilities potentially requiring rework or workarounds to resolve.*

7       1.1     Would this circumstance result in FEI's financial responsibility in the event that it  
8             could be shown that the contractor had not undertaken adequate core sampling  
9             prior to encountering unexpected subsurface or underground conditions?

10

11    **Response:**

12    FEI does not expect the contractor to be responsible for undertaking core sampling for the PGR  
13    Project prior to conducting ground disturbance. FEI will complete geotechnical studies during  
14    the detailed design and prior to entering into the construction contract. In general, whether a  
15    particular circumstance would result in FEI's financial responsibility would depend on the terms  
16    negotiated with the contractor.

17



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1    **2.0    Reference:    Exhibit B-6, BCUC IR 15.6**

2            2.1        With respect to the formal risk analysis described in the referenced IR, can FEI  
3                    confirm that it will use estimated variances (or standard deviations) of variables  
4                    as inputs to the exercise? If so, please list the variables and their means and  
5                    standard deviations that FEI will use as inputs in the risk analysis exercise.  
6

7    **Response:**

8    FEI will not use estimated variances (or standard deviations) of variables as inputs in the risk  
9    analysis exercise described in response to BCUC IR1 15.6. The methodology employed by FEI  
10   for the formal (quantitative) risk analysis is described on page 6 of the report in Confidential  
11   Appendix E-2 - Validation Estimating Contingency Report. The methodology relies on  
12   quantifying the scope of cost and schedule impacts for critical risks identified through the risk  
13   management process. The scope of the impact is expressed as a range of likely impacts and  
14   assigns a probability distribution curve to the risk event's impact, which is then used as an input  
15   to the risk quantification tool.

16  
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18  
19            2.2        Please describe the data sources that FEI will use in conducting the risk analysis  
20                    exercise.  
21

22   **Response:**

23   Please refer to the response to BCOAPO IR2 2.1.