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March 15, 2021

B.C. Sustainable Energy Association  
c/o William J. Andrews, Barrister & Solicitor  
1958 Parkside Lane  
North Vancouver, B.C.  
V7G 1X5

Attention: Mr. William J. Andrews

Dear Mr. Andrews:

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

**Biomethane Energy Recovery Charge (BERC) Rate Methodology – British Columbia Utilities Commission (BCUC) Decision and Order G-133-16 Compliance Filing – BERC Rate Assessment Report**

**Response to the B.C. Sustainable Energy Association (BCSEA) Information Request (IR) No. 1**

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On August 12, 2020, FEI filed the Application referenced above. In accordance with the BCUC Order G-35-21 setting out the Regulatory Timetable for the review of the Application, FEI respectfully submits the attached response to BCSEA IR No. 1.

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



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1   **1.0   Topic:       BERC Rate Methodology**  
2           **Reference:   Exhibit B-1, BERC Report, Figure 1: Monthly Net Customers Addition**  
3                           **and Cumulative Total Customers, page 6**

4           1.1   Can FEI confirm that Figure 1 indicates an annual cycle of monthly biomethane  
5                   net customer additions, peaking in the late Fall and relatively low in April? If so,  
6                   why would this be?

7  
8   **Response:**

9   Confirmed. The net RNG customer additions tend to peak in the fall as the heating season  
10 starts, and then become relatively low in April through August in the summer season. This  
11 annual cycle is similar to the net customer additions of the residential and small commercial  
12 conventional natural gas customers.

13

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1    **2.0    Topic:           BERC Rate Methodology**

2           **Reference:    Exhibit B-1, BERC Report, Figure 1: Monthly Net Customers Addition**  
3                           **and Cumulative Total Customers, page 6**

4           FEI says on page 6 that “The temporary closure of the RNG Program led to the steady  
5           erosion of the total number of customers enrolled, due to the ordinary level of customers  
6           exiting the program not being replaced by new participants.”

7           FEI says on page 9 that “The Short Term BERC Rate sales volume then declined in  
8           2018, as both UBC and the City of Vancouver executed long term contracts and  
9           migrated to the Long Term BERC Rate.”

10           2.1    Did FEI exercise control over the apparent trade-off between Short Term sales  
11                   and Long Term sales, coinciding with the new RNG long term contracts in 2018  
12                   and the subsequent temporary closure of the RNG Program in 2019? If so,  
13                   please explain FEI’s decision-making process.

14  
15    **Response:**

16    FEI did not exercise control over customers switching from the standard short term rate to the  
17    contracted long term rate, beyond informing customers of their options and assisting them with  
18    their preferred approach. The option to enter into a long term contract was freely available to  
19    any interested large volume customers. UBC and the City of Vancouver chose to enter into  
20    long term contracts, as opposed to acquiring RNG via short term offerings, of their own accord.  
21    FEI did not know when signing these contracts that the program would be temporarily closed in  
22    2019.

23

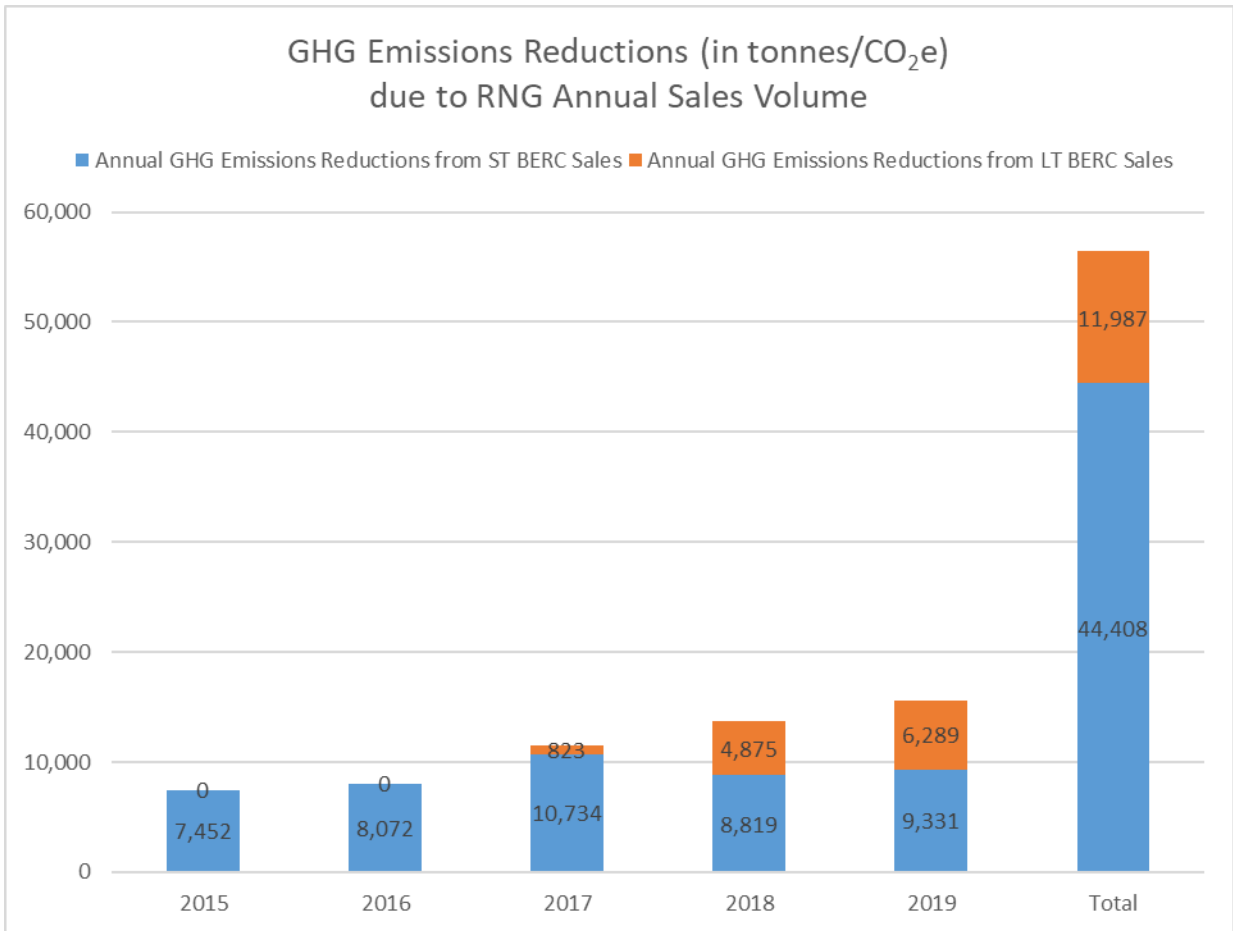
1 **3.0 Topic: Sales Volume**

2 **Reference: Exhibit B-1, BERC Report, Figure 3: RNG Annual Sales Volume, page**  
3 **9**

4 3.1 Please provide a figure like Figure 3 except showing annual GHG emissions  
5 reductions (in tonnes/CO<sub>2</sub>e) due to RNG sales for 2015 to 2019 and total.  
6

7 **Response:**

8 The following figure shows the annual GHG emissions reductions (in tonnes/CO<sub>2</sub>e) from RNG  
9 sales to Short-Term and Long-Term BERC rate customers for 2015 to 2019 and the total.



10

11

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1    **4.0    Topic:            Offsets**

2                    **Reference:    Exhibit B-1, page 11**

3                    FEI states that it purchased carbon offsets to fulfill a 90 TJ shortfall between RNG supply  
4                    and RNG sold to customers for 2019.

5                    4.1        Please describe in more detail FEI's process for determining when and in what  
6                    volumes it would purchase carbon offsets in lieu of supplying RNG to customers.

7

8                    **Response:**

9                    Please refer to the responses to BCUC IR1 5.1 and 12.1 for details regarding carbon offset  
10                    purchases to cover shortfalls in biomethane supply.

11

12

13

14                    4.2        Does FEI cap the amounts of carbon offsets it would purchase in a year in lieu of  
15                    supplying RNG?

16

17                    **Response:**

18                    FEI does not cap the amount of carbon offset purchases; however, the goal is to provide  
19                    voluntary RNG customers with actual biomethane. FEI continues to monitor and curtail RNG  
20                    sales to customers in an effort to minimize the amount of carbon offsets purchased while new  
21                    RNG supply comes online.

22



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- 1   **5.0   Topic:        Supply/Demand Balancing for the RNG Program**
- 2                   **Reference:   Exhibit B-1, BERC Report, Table 2: Contracted RNG Supply Projects,**
- 3                                   **page 12**
- 4            5.1    Please provide a version of Table 2 showing the types of RNG supply (landfill,
- 5                                   sewage, organic waste, etc.) and the province for each Project.
- 6
- 7    **Response:**
- 8    Please refer to the response to BCUC IR1 3.1, which requests an update on projects listed in
- 9    Table 2. FEI has included project type and province location in response to that IR.

10

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1   **6.0   Topic:           Supply/Demand Balancing for the RNG Program**

2           **Reference:   Exhibit B-1, BERC Report, page 12**

3           FEI says on page 12:

4                   “The current maximum amount of RNG that FEI can contract and remain within  
5                   the existing Greenhouse Gas Reduction (Clean Energy) Regulation (GGRR) is  
6                   approximately 8,900 TJs per year. FEI further anticipates that it will enter into  
7                   additional biomethane supply agreements before the end of 2020, such that the  
8                   total maximum supply under executed agreements could reach maximum volume  
9                   currently set in the GGRR.” [underline added]

10           6.1   Please update whether additional biomethane supply agreements have been  
11                   entered into, such that the total maximum supply under executed agreements  
12                   has reached the maximum volume currently set in the GGRR. If possible, please  
13                   elaborate on when the GGRR maximum volume may be reached.

14  
15   **Response:**

16   Please refer to the expanded and updated table in response to BCUC IR1 3.1. For discussion  
17   on reaching the maximum volume in the GGRR please refer to the responses to BCUC IR1 3.6,  
18   3.7 and 3.10.

19

- 1   **7.0   Topic:       Supply/Demand Balancing for the RNG Program**
- 2       **Reference:   Exhibit B-1, BERC Report, Table 3: Total Expect RNG supply**
- 3       **volumes 2020-2024, p.13**

**Table 3: Total Expect RNG supply volumes 2020-2024**

1 Year	2 Expected Total RNG Supply (TJ)
2020	290
2021	950
2022	3,850
2023	5,120
2024	5,580

- 4
- 5       7.1   Please provide a table similar to Table 3 except showing Total Maximum
- 6       Contracted RNG supply volume.
- 7

8   **Response:**

9   Please refer to the response to BCUC IR1 3.1 for updated tables on RNG supply, although a

10 more realistic measure of the supply ramp-up is to use total expected supply as indicated in

11 response to BCUC IR1 3.7. RNG projects may not produce at their maximum contractual

12 volumes for a variety of reasons.

13





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1    **8.0    Topic:            Carbon Tax**

2            **Reference:    Exhibit B-1, BERC Report, footnote 7 on page 15**

3            FEI says in footnote 7 on page 15:

4                    “Carbon tax was \$1.4898 since July 1, 2012, increased to \$1.7381 on April 1,  
5                    2018, and increased to 1.9864 on April 1, 2019.”

6            8.1    Please confirm, or otherwise explain, that the carbon tax here is expressed in  
7            terms of \$ per GJ of natural gas.

8

9    **Response:**

10   Confirmed.

11

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1    **9.0    Topic:            BVA Balance**

2                    **Reference:    Application, Exhibit B-1, Table 4, page 15**

3                    9.1       Does the “-“ under 1-Jan-19 mean that there was a \$0 balance in the BVA  
4                    account? If not, please explain.

5

6    **Response:**

7    Confirmed. The “-“ under 1-Jan-19 means that there was a \$0 balance in the BVA account.

8

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1   **10.0   Topic:            BVA Balance Transfer Rate Base Deferral Account**

2           **Reference:   Exhibit B-1, BERC Report, Table 8: BVA Balance Transfer, page 16**

3           FEI says that “Table 8 present the costs transferred from the BVA to the BVA Balance  
4           Transfer rate base deferral account, as of January 1 of each year from the date of  
5           implementation of the new BERC rate methodology to date.”

6           In the 2016 Decision on page 45, the Panel directed FEI to recover the BVA balance  
7           through a rate rider:

8                            “In order to provide the transparency directed in the 2013 Decision the Panel  
9                            directs that the recovery of the BVA balance be through a rate rider from FEI’s  
10                          non-bypass customers, effective January 1st of the subsequent year (BVA Rate  
11                          Rider).”

12           10.1   Please explain how the BVA Balance Transfer Rate Base Deferral Account  
13                          works. Is it amortized annually through a rate rider from FEI’s non-bypass  
14                          customers?  
15

16   **Response:**

17   Confirmed. The BVA Balance transfer account is collected annually from FEI’s non-bypass  
18   customers via the BVA rate rider.

19   The BVA rate rider is approved in FEI’s annual rates applications. When applying for test year  
20   rates through FEI’s Annual Review for Rates, FEI determines a proposed BVA rate rider by  
21   projecting the ending balance of the BVA Balance transfer account in the current year (the year  
22   FEI files the application for the test year rates) for recovery starting January 1<sup>st</sup> of the test year.

23   For additional clarity, the BVA Balance for recovery through the 2021 delivery rate rider was  
24   calculated in 2020<sup>1</sup> as follows:

- 25           1. 2019 actual ending balance in the BVA Balance Transfer Deferral, less  
26           2. Projection of rider recoveries to be received in 2020, plus  
27           3. Projection of 2020 year end balance transfer from the BVA, equals  
28           4. The total BVA Balance transfer account balance projected to be recovered by the BVA  
29           rate rider<sup>2</sup> in 2021.  
30  
31  
32

<sup>1</sup> The 2021 BVA rate rider was calculated in FEI’s Annual Review for 2021 Rates application filed in August 2020

<sup>2</sup> The projected BVA Balance transfer account balance is divided by 2021 non-bypass volume to arrive at the \$/GJ BVA rate rider



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1           10.2   Please explain the year-to-year variations in the BVA Transfers shown in Table  
 2                   8. Does FEI believe there is a trend?

3  
 4   **Response:**

5   Table 8 in the Application represents gross costs transferred from the BVA to the BVA Balance  
 6   transfer account. The amount transferred is then reduced by the tax amount, meaning that it is  
 7   reduced by the tax recovery of the amount transferred. The table below summarizes the annual  
 8   gross and net of tax amount BVA transfer amounts.

9

Line	BVA Rider Deferral Account Continuity (\$000s)	2016	2017	2018	2019	Reference
1	Net of Tax BVA Transfer	2,203	1,866	2,702	1,917	
2	Tax Rate	26%	26%	27%	27%	
3	End of Year Gross BVA Transfer - Jan 1 following year open balance	2,977	2,522	3,702	2,626	Line 1 / (1-Line 2)

10

11   The number reported in Table 8 and line 1 in the table above is the Gross BVA costs in excess  
 12   of BERC recoveries and ending inventory valued at the BERC rate that is transferred to the BVA  
 13   Balance transfer account. The BVA Balance transfer account balance is a product of the  
 14   following:

- 15           1. Volumes of RNG purchased
- 16           2. Volume of RNG sold
- 17           3. Volume of ending inventory
- 18           4. Purchase price of inventory
- 19           5. Recovery price of RNG sales
- 20           6. General cost of the RNG program

21  
 22   There does not appear to be a trend in the value transferred from the BVA to BVA Balance  
 23   transfer deferral account.

24

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1   **11.0   Topic:           Churn Rate**

2           **Reference:   Exhibit B-1, Appendix A, Table 2**

3           11.1   Please discuss the differing churn rates shown between the different rate classes  
4                   in Table 2 of Appendix A.

5

6   **Response:**

7   The monthly churn rate for RS 1B ranges from 0.3 percent to 1.8 percent, but most months fall  
8   between 0.7 percent and 1.2 percent. The churn rate for RS 1B is quite representative of the  
9   ordinary rate of drop off from mass market customers, because this rate schedule has the most  
10   number of participants. The churn rate of approximately 1 percent shows the monthly drop off  
11   from the RNG program is not very significant.

12   Looking at the remaining rate schedules, the churn rates begin to become more variable since  
13   the comparatively limited number of customers enrolled produces larger churn rates when only  
14   a few (or even 1) customer exits the program.

15   The monthly churn rate for RS 2B varies from a high of 7.2 percent to a low of 0 percent, though  
16   is typically between about 1 and 2 percent. This shows the monthly drop off from the RNG  
17   program is also not very significant for this rate schedule.

18   The average monthly churn rate each year for RS 3B, 5B and 11B, for 2016 to 2020, varies  
19   significantly month over month because there are less than 20 customers in each of those rate  
20   schedules, and a single customer drop off can swing the churn rate significantly. A discussion of  
21   the churn rate for those rate schedules is not meaningful.

22

23

24

25           11.2   Does FEI identify a particular threshold between churn rates that are not a  
26                   concern and those that are? Please discuss.

27

28   **Response:**

29   FEI has not yet witnessed churn rates that are particularly significant, and has therefore not  
30   established any specific thresholds beyond which it would have concerns. Please refer to the  
31   response to BCSEA IR1 11.1 for more discussion.

32

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1 **12.0 Topic: RNG volumes of sales and revenues**

2 **Reference: Application, Exhibit B-1, Appendix A, Tables 3 & 4**

3 12.1 Please provide a summary description of each RNG rate class.

4  
5 **Response:**

6 The following provide a summary description of each RNG rate schedule, as per FEI's  
7 published tariffs. Some additional context is also provided for Rate Schedules 5B and 11B.

- 8
- 9 • Rate Schedule 1B Residential Biomethane Service<sup>3</sup>: Renewable natural gas rate for  
10 single-family residences and separately metered multi-family residences. This Rate  
11 Schedule is applicable to firm Gas supplied at one Premises for use in approved  
12 appliances for all residential applications in single-family residences, separately metered  
13 single-family townhouses, rowhouses, condominiums, duplexes and apartments and  
14 single metered apartment blocks with four or less apartments. This Rate Schedule is  
15 available in all territory served by FortisBC Energy, with the exception of the Municipality  
of Revelstoke, provided adequate capacity exists on the FortisBC Energy System.
  - 16 • Rate Schedule 2B Small Commercial Biomethane Service<sup>4</sup>: This Rate Schedule is  
17 applicable to Customers with a normalized annual consumption at one Premises of less  
18 than 2,000 Gigajoules of firm Gas, for use in approved appliances in commercial,  
19 institutional or small industrial operations. This Rate Schedule is available in all territory  
20 served by FortisBC Energy, with the exception of the Municipality of Revelstoke,  
21 provided adequate capacity exists on the FortisBC Energy System.
  - 22 • Rate Schedule 3B Large Commercial Biomethane Service<sup>5</sup>: This Rate Schedule is  
23 applicable to Customers with a normalized annual consumption at one Premises of  
24 greater than 2,000 Gigajoules of firm Gas, for use in approved appliances in commercial,  
25 institutional or small industrial operations. This Rate Schedule is available in all territory  
26 served by FortisBC Energy, with the exception of the Municipality of Revelstoke,  
27 provided adequate capacity exists on the FortisBC Energy System.
  - 28 • Rate Schedule 5B General Firm Biomethane Service<sup>6</sup>: General firm renewable natural  
29 gas rate for the sale of firm gas, no portion of which may be resold, through one meter  
30 station to a customer. This Rate Schedule is applicable to larger volume Customers and  
31 is available in all territory served by FortisBC Energy, with the exception of the  
32 Municipality of Revelstoke, provided adequate capacity exists on the FortisBC Energy  
33 System.

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3 [https://www.cdn.fortisbc.com/libraries/docs/default-source/about-us-documents/regulatory-affairs-documents/gas-utility/rateschedule\\_1b.pdf](https://www.cdn.fortisbc.com/libraries/docs/default-source/about-us-documents/regulatory-affairs-documents/gas-utility/rateschedule_1b.pdf).

4 [https://www.cdn.fortisbc.com/libraries/docs/default-source/about-us-documents/regulatory-affairs-documents/gas-utility/rateschedule\\_2b.pdf](https://www.cdn.fortisbc.com/libraries/docs/default-source/about-us-documents/regulatory-affairs-documents/gas-utility/rateschedule_2b.pdf).

5 [https://www.cdn.fortisbc.com/libraries/docs/default-source/about-us-documents/regulatory-affairs-documents/gas-utility/rateschedule\\_3b.pdf](https://www.cdn.fortisbc.com/libraries/docs/default-source/about-us-documents/regulatory-affairs-documents/gas-utility/rateschedule_3b.pdf).

6 [https://www.cdn.fortisbc.com/libraries/docs/default-source/about-us-documents/regulatory-affairs-documents/gas-utility/rateschedule\\_5b.pdf](https://www.cdn.fortisbc.com/libraries/docs/default-source/about-us-documents/regulatory-affairs-documents/gas-utility/rateschedule_5b.pdf).

- 1       • Rate Schedule 11B Biomethane Large Volume Interruptible Sales<sup>7</sup>: On-system  
 2       interruptible sales rate for customers entering into a contract for the short-term sale and  
 3       purchase of biomethane. This Rate Schedule is applicable to larger volume Customers  
 4       seeking interruptible RNG service and is available in all territory served by FortisBC  
 5       Energy, with the exception of the Municipality of Revelstoke, provided adequate capacity  
 6       exists on the FortisBC Energy System.
- 7       • Rate Schedule 11B Long-Term Biomethane Large Volume Interruptible Sales: On-  
 8       system interruptible sales rate for customers entering into a contract for the long-term  
 9       sale and purchase of biomethane. This Rate Schedule is applicable to larger volume  
 10      Customers seeking interruptible RNG service and is available in all territory served by  
 11      FortisBC Energy, with the exception of the Municipality of Revelstoke, provided  
 12      adequate capacity exists on the FortisBC Energy System.

13  
14

15

16           12.2   Please provide in tabular form the annual average RNG sales quantities and  
 17           revenues for each RNG rate class for each full year covered by Tables 3 & 4.

18

19   **Response:**

20   FEI understands this question to be asking for the annual totals (as opposed to averages) given  
 21   that the question is asking for the information to be broken out by both year and rate schedule.  
 22   The following tables provide the total annual RNG sales quantities and revenues for each RNG  
 23   rate schedule for each full year covered by Tables 3 and 4. The tables are also updated to  
 24   provide the annual data for 2020. Please also refer to the responses to BCUC IR1 17.1 and  
 25   18.1 for updated Table 3 and Table 4 of Appendix A to the Report to include monthly data up to  
 26   the end of 2020 or later.

RNG Annual Revenue by Rate Schedule (\$000)							
Rate Schedule	1B	2B	3B	5B	11B	11B Long term	30 Off System
2016	765.9	88.3	76.3	0.0	1,205.4	0.0	11.2
2017	931.5	138.8	171.2	0.0	1,039.4	166.0	3.5
2018	972.7	152.5	145.5	1.2	515.4	984.0	0.0
2019	1,166.3	194.7	175.5	226.5	173.5	1,267.7	0.0
2020	1,172.7	225.8	197.9	160.5	0.0	1,396.0	0.0

<sup>7</sup> [https://www.cdn.fortisbc.com/libraries/docs/default-source/about-us-documents/regulatory-affairs-documents/gas-utility/rateschedule\\_11b.pdf](https://www.cdn.fortisbc.com/libraries/docs/default-source/about-us-documents/regulatory-affairs-documents/gas-utility/rateschedule_11b.pdf).



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RNG Annual Sales Quantity by Rate Schedule (TJ)							
Rate Schedule	1B	2B	3B	5B	11B	11B Long term	30 Off System
2016	60.5	6.9	5.8	0.0	89.6	0.0	0.8
2017	88.4	13.2	16.2	0.0	98.7	16.6	0.0
2018	96.9	15.2	14.5	0.1	51.2	98.3	0.0
2019	113.4	18.9	17.1	22.0	16.9	126.8	0.0
2020	111.3	21.4	18.8	15.0	0.0	139.6	0.0

1  
2





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1 **13.0 Topic: Future Review of RNG Program**

2 **Reference: Exhibit B-2, FEI 17 November 2020 Letter to BCUC**

3 “FEI has commenced planning for a comprehensive review and assessment of the RNG  
4 Program.”

5 13.1 Please provide an update on FEI’s planning for a comprehensive review and  
6 assessment of the RNG Program.

7  
8 **Response:**  
9 As indicated in Exhibit B-2, FEI will provide the BCUC and interveners with a status update on  
10 or before June 30, 2021, which will include expected timing for its comprehensive review and  
11 assessment of the RNG Program, currently anticipated for late 2021.

12