

# FASKEN

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## Electronic Filing

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

**Attention: Mr. Patrick Wruck, Commission Secretary**

Dear Sirs/Mesdames:

**Re: FortisBC Energy Inc. (“FEI”) Application for a Certificate of Public Convenience and Necessity (“CPCN”) for the Pattullo Gas Line Replacement Project (“PGR Project” or “Project”) – Supplemental Reply Argument**

Further to the British Columbia Utilities Commission (“BCUC”) letter of April 12, 2021,<sup>1</sup> FEI is filing this Supplemental Reply Argument related to the revised construction timeline of the Pattullo Bridge Replacement Project, which the Province of British Columbia announced in an April 1, 2021 news release.

As FEI submitted in its Supplemental Final Argument, the revised construction timeline does not impact the cost, schedule or alternatives analysis for the Project.<sup>2</sup> The two interveners that filed supplementary final arguments in this proceeding, 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 (“BCOAPO”) and Commercial Energy Consumers Association of BC (“CEC”), agree with FEI’s submissions in this regard.

While CEC accepts FEI’s assessment that the delay to the Pattullo Bridge Replacement Project does not change the PGR Project’s cost estimate or schedule, it suggests that FEI could inquire into the expected length of the delay.<sup>3</sup> In reply, FEI submits that there is no basis to assume that the Ministry of Transportation and Infrastructure (“MoTI”) could or would provide FEI with information beyond the news release. Despite the need to replace the capacity of FEI’s existing

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<sup>1</sup> Exhibit A-9.

<sup>2</sup> See also, Exhibit B-15.

<sup>3</sup> CEC Supplemental Final Argument, p. 1.



Pattullo Gas Line being caused by the demolition of the Pattullo Bridge, FEI's PGR Project and MoTI's project are distinct. From MoTI's perspective, FEI is one of many stakeholders that have an interest in the schedule of the Pattullo Bridge Replacement Project.

FEI submits that the delay announced by the Province, which is uncertain and may be mitigated,<sup>4</sup> does not change the public interest in the Project proceeding as FEI has proposed. FEI respectfully requests that the BCUC grant a CPCN for the Project and approve the PGR Application and Preliminary Stage Development Costs deferral account.

Yours truly,

**FASKEN MARTINEAU DuMOULIN LLP**

*[Original signed by]*

Christopher Bystrom\*

\*Law Corporation

CRB/NR

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<sup>4</sup> FEI Supplemental Final Argument, p. 2.