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July 27, 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)**

**Application for a Certificate of Public Convenience and Necessity (CPCN) for Approval of the Coastal Transmission System Transmission Integrity Management Capabilities Project (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. 1**

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On February 11, 2021, FEI filed the Application referenced above. In accordance with the British Columbia Utilities Commission Order G-149-21 setting out the Regulatory Timetable for the review of the Application, FEI respectfully submits the attached response to BCOAPO 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



FortisBC Energy Inc. (FEI or the Company) Application for a Certificate of Public Convenience and Necessity (CPCN) for Approval of the Coastal Transmission System (CTS) Transmission Integrity Management Capabilities (TIMC) Project (Application)	Submission Date: July 27, 2021
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1    **1.0    Reference:    Exhibit B-1, Section 3.2.2.3**

2           **Preamble:**    In Section 3.2.2.3, FEI discusses hydrostatic testing stating “Once a  
3                            pipeline has been constructed, coated and buried, it is subjected to a  
4                            hydrostatic test” prior to being placed in service.

5            1.1        Please confirm that each segment of pipe that is included in the TIMC project  
6                            were subjected to hydrostatic testing when constructed. If not, please explain  
7                            fully why not.

8  
9            **Response:**

10           FEI confirms that each segment of pipe that is included in the Project would have been  
11           subjected to hydrostatic testing when constructed.

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15            1.2        FEI states that a minimum test factor of 1.25 is sufficient. Please discuss in  
16                            detail FEI’s position on whether there is any correlation between hydrostatic test  
17                            results and any subsequent corrosion or cracking.

18  
19            **Response:**

20           FEI has not observed a correlation between hydrostatic test results and any subsequent  
21           corrosion or cracking in its system, nor would it expect one. A hydrostatic test immediately after  
22           construction is expected to remove pre-existing manufacturing and construction flaws (up to a  
23           certain size depending on the test pressure), whereas subsequent corrosion or cracking is  
24           caused by the post-construction operating environment. In alignment with Section 3.2.2.3 of the  
25           Application:

- 26            • Pipe with a minimum test factor of less than 1.25 has is an increased failure risk due to  
27                            potential manufacturing and construction flaws that could have existed in the pipeline  
28                            since the time of original construction; and
- 29            • Pipe that is subjected to time-dependent steel-weakening processes such as corrosion  
30                            or stress corrosion cracking, regardless of its minimum test factor, has a potential failure  
31                            risk due to those time-dependent mechanisms interacting with manufacturing and  
32                            construction flaws that could have existed in the pipeline since the time of original  
33                            construction.

34           FEI requested that JANA also provide a response to BCOAPO IR1 1.2. JANA provides the  
35           following response:



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1 JANA agrees with the FEI response.

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5 1.3 Please confirm whether FEI's position on correlation between hydrostatic test  
6 results and any subsequent corrosion or cracking is the same as industry best  
7 practice and if not, please provide a description of all differences and all  
8 congruencies between the two.

9

10 **Response:**

11 While FEI has not conducted any formal analysis, and bases its response on its general  
12 experience including its industry knowledge activities (as described in Section 3.3.2 of the  
13 Application), FEI's understanding is that its position on correlation between hydrostatic test  
14 results and any subsequent corrosion or cracking is the same as industry best practice.

15 FEI requested that JANA also provide a response to BCOAPO IR1 1.3. JANA provides the  
16 following response:

17 JANA agrees that the FEI position aligns with industry best practice.

18

19

20

21 1.4 If the segments were tested, please provide the hydrostatic test results.

22

23 **Response:**

24 All segments included in the CTS TIMC Project were hydrostatically tested in accordance with  
25 CSA Z662 to either a minimum of 1.25 or 1.4 times the maximum operating pressure,  
26 depending on the class location of the pipeline. Consequently, all pipeline segments passed  
27 hydrostatic testing prior to being put into service.

28 Given that the CTS is made up of multiple pipelines and has been extensively modified over the  
29 decades since its initial construction, the complete set of hydrostatic test results for all pipeline  
30 segments and station equipment would comprise hundreds of records. Locating, collecting, and  
31 providing all of the individual test results would require considerable effort, with little offsetting  
32 benefit to the evidentiary record. On this basis, FEI respectfully declines to provide the  
33 requested test results.

34 FEI provides as Attachment 1.4 the hydrostatic test records for the ROE TIL 914 pipeline which  
35 was installed in 1981 as an example of the results typically obtained. Over the years, 10 pipeline

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- 1 alterations have taken place that each required their own records and proof of hydrostatic
- 2 testing. The three sample record sets attached represent the initial installation in 1981
- 3 (Attachments 1.4a and 1.4b) and one alteration in 2002 (Attachment 1.4c).
- 4





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Item	How FEI processes impact pipeline reliability	Forecast process changes as a result of the TIMC project
<b>Design, material selection, and procurement</b>	<ul style="list-style-type: none"> <li>• Design: Intended to ensure that assets have been designed in compliance with applicable codes, standards, regulations and industry practices; and can meet constructability, reliability, maintainability, and operability requirements in a safe, efficient, economic and environmentally and socially responsible manner.</li> <li>• Material selection and procurement: Intended to mitigate failure incidents associated with material defects and equipment failure attributed to the manufacture or manufacturer's design of the material or equipment.</li> </ul>	<p>Learnings from the TIMC project will be used in the design of new and replacement sections of pipelines and stations to ensure optimal tool velocities can be achieved. New ILI facilities will be designed to accommodate a larger range of ILI tools including EMAT.</p>
<b>Construction, including installation, inspection, and quality assurance and control</b>	<ul style="list-style-type: none"> <li>• Intended to mitigate failure incidents caused during installation by operations personnel and contractors. "Field Quality Management" is a set of protocols that manages human performance risks by ensuring that field work (e.g. construction, operations and maintenance) is completed in a safe and effective manner by following internal and external quality requirements.</li> </ul>	<p>This activity is not forecast to change as a result of the TIMC project.</p>
<b>Operations and maintenance, which includes:</b> <ul style="list-style-type: none"> <li>• <b>Vegetation management and pipeline patrol for preventing third-party damage</b></li> </ul>	<ul style="list-style-type: none"> <li>• Maintenance (general): Maintenance Programs are planned activities that extend the life of the gas system assets by ensuring continued proper operating conditions by using preventative maintenance practices.</li> <li>• Vegetation management: Intended to mitigate failure incidents caused by third-party damage. The provision of clear sight lines to identify the existence of pipelines is a key component of third-party damage prevention. Vegetation management also provides clear access to FEI pipelines and facilities to maintain signage, conduct surveys, and other operations work in order to maintain the integrity of the pipeline system. Vegetation management also manages the risks to FEI pipelines and facilities from hazard trees and root interactions.</li> <li>• Pipeline patrol: Intended to mitigate failure incidents caused by third-party damage. Pipeline patrol is a scheduled activity to monitor for signs of activity or events which might impact the integrity of transmission pipelines.</li> </ul>	<p>This activity is not forecast to change as a result of the TIMC project.</p>

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Item	How FEI processes impact pipeline reliability	Forecast process changes as a result of the TIMC project
<b>Operations and maintenance, which includes:</b> <ul style="list-style-type: none"> <li>• <b>Water crossing inspections and seismic mitigation for preventing failures due to natural hazards</b></li> </ul>	<ul style="list-style-type: none"> <li>• <b>Water crossing inspections:</b> Intended to prevent and/or mitigate failure incidents caused by these types of natural hazards. During asset design, geotechnical and hydrotechnical hazards are considered and avoided and/or mitigated where possible. Monitoring and mitigation actions are implemented where required during the asset lifecycle.</li> </ul>	<p>This activity is not forecast to change as a result of the TIMC project.</p>
<b>Operations and maintenance, which includes:</b> <ul style="list-style-type: none"> <li>• <b>Pipeline condition monitoring using ILI for detecting and sizing of geometric imperfections (e.g., dents, wrinkles, and buckles) and metal loss imperfections (e.g., corrosion and gouges)</b></li> </ul>	<ul style="list-style-type: none"> <li>• <b>In-line inspection:</b> Intended to identify, size, and monitor anomalies (e.g., metal loss, dents, mechanical damage, buckles, wrinkles, cracking, and manufacturing flaws) that may adversely affect the integrity of specific in-line inspected pipelines.</li> </ul>	<p>Pipeline condition monitoring using ILI will be expanded to include EMAT for management of SCC and crack-like imperfections. This will provide the required data for FEI to mitigate failure due to cracking.</p>
<b>Emergency preparedness, response, and recovery</b>	<ul style="list-style-type: none"> <li>• <b>Emergency preparedness:</b> Intended to ensure verifiable capability to respond to an emergency in accordance with emergency procedures and response plans, and to demonstrate the effectiveness of such procedures and plans.</li> </ul>	<p>This activity is not forecast to change as a result of the TIMC project.</p>



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Item	How FEI processes impact pipeline reliability	Forecast process changes as a result of the TIMC project
<p><b>Risk management</b></p>	<ul style="list-style-type: none"> <li>• Risk management: Intended to identify, assess, and manage the hazards and associated risks for the life cycle of the pipeline system.</li> </ul>	<p>FEI forecasts that the data provided through EMAT in-line inspections, including subsequent integrity digs and analysis, will improve its capabilities for ongoing quantitative risk assessments of cracking threats on its transmission pipelines.</p>

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1 As stated in the response to BCOAPO IR1 5.1, the TIMC project will improve FEI's operational  
2 risk as it helps FEI better identify time dependent threats that may cause catastrophic and  
3 unexpected failures. As a safety-driven project, the TIMC project will not generate additional  
4 revenue on its own and the associated cost recovery from customers will result in higher rates  
5 and reduced price competitiveness leading to higher price risk. These two factors will serve to  
6 offset each other in determining overall business risk but, as stated above, it is not possible to  
7 quantify the impact.

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11 5.2 Please fully explain FEI's risk targets and goals.

12 5.2.1 Is it FEI's goal to take all risks to zero?

13 5.2.2 Provide a full discussion and analysis of the cost of risk mitigation and  
14 risk reduction, including a discussion of the relation between cost and  
15 risk reduction.

16

17 **Response:**

18 FEI provides the following response:

19 Any ruptures of FEI's transmission pipelines are unacceptable to FEI, the public, and its  
20 regulators. As part of FEI's Integrity Management Program for Pipelines, FEI strives to have  
21 zero failure incidents<sup>2</sup> or other incidents involving the functionality of the gas system assets that  
22 could result in the following consequences:

- 23 • **Safety:** Serious injury or worse to any person (employee, contractor, customer, or  
24 public); and/or
- 25 • **Environment:** An estimated irreversible, long-term, or continuous change to the ambient  
26 environment in a manner that causes harm to human life, wildlife, or vegetation; and/or
- 27 • **Service Disruption:** Outage that impacts a large number of customers.

28 FEI, in alignment with industry best practices, endeavours to implement integrity management  
29 activities that mitigate threats to its transmission pipelines. Even so, FEI recognizes that residual  
30 risk cannot be reduced to zero.

31 FEI considers the risk benefits and cost of projects on an individual project basis. Please refer to  
32 the response to BCUC IR1 12.1 for FEI's discussion of cost as it pertains to FEI's risk mitigation  
33 proposed by the CTS TIMC Project.

<sup>2</sup> A failure incident is defined in CSA Z662-19 as "an unplanned release of service fluid".



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1 FEI requested that JANA also provide a response to BCOAPO IR1 5.2, 5.2.1 and 5.2.2. JANA  
2 provides the following response:

3 It is JANA's opinion that FEI's risk targets are consistent and aligned with those of the North  
4 American gas pipeline industry.

5 It is JANA's opinion that it is not possible to reduce risk to zero for any activity or pipeline  
6 operation.

7 Once a risk has been identified within the pipeline system requiring mitigation then the most  
8 cost-effective mitigation approaches should be considered, as FEI has done in the CPCN  
9 submission.

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13 5.3 Please provide responses to the above questions from each of FEI and JANA's  
14 perspectives.

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16 **Response:**

17 Please refer to the response to BCOAPO IR1 5.2.

18

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21 5.4 Please fully explain what FEI will do if the BCUC denies its intention to recover  
22 the project costs through customer rates. Would FEI still implement the project?

23

24 **Response:**

25 FEI submits that the CTS TIMC Project is in the public interest, necessary, and the most cost-  
26 effective way for FEI to mitigate the identified cracking risk to the 11 CTS pipelines and,  
27 therefore, that the BCUC should issue a CPCN for the Project. If the BCUC issues a CPCN,  
28 FEI must be provided a reasonable opportunity to recover its prudently incurred project costs  
29 through customer rates. As the BCUC stated in its Decision on the Inland Gas Upgrade project  
30 (at p. 41), "there is no regulatory requirement for FEI's shareholder to fund pipeline integrity  
31 management initiatives."

32 If the BCUC did not issue a CPCN or, for some other reason, denied recovery of project costs  
33 through rates, FEI would need to consider the BCUC's reasons and assess its options at that  
34 time. As cracking threats must be mitigated, FEI would need to address whatever concerns the



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1 BCUC identified in its Decision and seek the appropriate approvals to move forward with the  
2 Project.

3 Please also refer to the response to BCUC IR1 4.6.

4

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7 5.5 Please fully explain how the implementation of projects such as this impacts FEI  
8 insurance costs.

9

10 **Response:**

11 FEI designs, constructs, operates, and maintains its assets in order to provide safe and reliable  
12 energy delivery to its customers. These efforts are key to preventing losses and resulting  
13 insurance claims. Insurers review FEI's assets and operations annually to understand the  
14 potential hazards associated with its business. They assess how FEI monitors, maintains, and  
15 improves these assets. Insurers expect utilities such as FEI to implement projects that enhance  
16 pipeline integrity and resiliency. It is also because of projects like these that FEI continues to  
17 present itself as a favourable risk to insurers. FEI has not experienced additional increases in  
18 insurance premiums (other than factors driven by market conditions).

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1    **6.0    Reference:    Exhibit B-1, Section 5.3.3**

2            **Preamble:**    In Section 5.3.3, FEI discusses an EMAT ILI Pilot Project. FEI states that  
3                            there was no severe cracking that required urgent repair work.

4            6.1    Please provide an analysis of all pilot results identifying cracks, corrosions, or  
5                            other anomalies.

6  
7    **Response:**

8    Please refer to the response to CEC IR1 17.2 for EMAT ILI pilot project results identifying  
9    cracks and crack-like anomalies in FEI's system.

10  
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13            6.2    For each anomaly, please specify all possible recommended actions including:  
14                            repair the anomaly,  
15                            replace the segment of pipe,  
16                            conduct an exploratory dig to verify the findings,  
17                            actively monitor the anomaly,  
18                            do nothing,  
19                            any other action (specifying what that action might be).

20  
21    **Response:**

22    Please refer to the response to CEC IR1 17.2.

23  
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25  
26            6.3    For each anomaly, please specify what action of the recommended possibilities  
27                            FEI prefers and why.

28  
29    **Response:**

30    Please refer to the response to BCUC IR1 11.1. At this stage of the EMAT ILI Pilot project, FEI  
31    chose to remove crack-like features for further advanced non-destructive and destructive testing  
32    as part of its validation process of tool performance and testing methodology. Subsequent  
33    decision-making regarding FEI's integrity management practices will be based on the validation  
34    results and severity of crack or crack-like anomalies found.



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6.4 Please provide the criteria used to determine the action chosen in the question above.

**Response:**

FEI used its interpretation of its obligations for maintaining compliance with CSA Z662 to determine that cracks should be removed by grinding or cut out for further testing. Destructive testing is performed by FEI and its industry peers to evaluate, with increased certainty, aspects of cracking such as sizing and type (e.g. SCC or other cracking causes). It also enables FEI to validate EMAT tool performance and non-destructive evaluation methods for future in-ditch crack characterization (i.e. during integrity digs), and provides other material testing opportunities.

CSA Z662:19 includes the following relevant excerpt:

10.10.5 Pipe body surface cracks: “Pipe body surface cracks shall be considered to be defects unless determined by an engineering assessment to be acceptable. The engineering assessment shall include consideration of service history and loading, anticipated service conditions (including the effects of corrosive and chemical attack), the mechanism of crack formation, crack dimensions, crack growth mechanisms, failure modes, and material properties (including fracture toughness properties). Pipe containing such defects shall be repaired using one of more of the acceptable repair methods given in Table 10.2.”

To facilitate FEI’s engineering assessments, destructive testing can provide, with varying degrees of confidence and completeness dependent on the specific situation and tests performed, information such as the:

- Crack formation mechanisms;
- Crack growth mechanisms;
- Crack dimensions; and
- Material properties.



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1           6.5     Please discuss how FEI will develop or implement criteria for action based on  
2                     EMAT ILI findings. Will FEI file an application with the Commission to test and  
3                     vet those criterion?  
4

5     **Response:**

6     Cracks on pipelines are considered to be defects unless determined by an engineering  
7     assessment to be acceptable, as per Clause 10.10.5 of CSA Z662:19. Therefore, the criteria for  
8     any action based on EMAT ILI findings will be situational and determined based on the  
9     experience and judgement of engineering professionals. FEI does not intend to file a separate  
10    application with the BCUC to test and vet those criteria.

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1    **7.0    Reference:    Exhibit B-1, Section 5.4.2**

2           **Preamble:**    In Section 5.4.2, FEI discusses heavy wall segment replacement.

3           7.1       Please confirm that the main reason for the replacement of heavy wall pipe is the  
4                      speed excursions that the EMAT ILI tool experiences with heavy wall pipe. If not  
5                      confirmed, please fully explain.

6  
7           **Response:**

8           The main reason for the replacement of heavy wall pipe is to avoid EMAT ILI tool speed  
9           excursions caused by transitions from heavy wall pipe to the thinner wall pipe located  
10           immediately downstream of the heavy wall pipe. Please also refer to the response to BCUC IR1  
11           14.3 for further explanation.

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15           7.2       Please confirm that for adjacent sections of pipe that are not heavy wall pipe, no  
16                      such excursions exist and that the EMAT ILI tool functions normally. If not  
17                      confirmed, please fully explain.

18  
19           **Response:**

20           Not confirmed. As explained in the response to BCUC IR1 14.3, the speed excursions take  
21           place in the thinner wall pipe located immediately downstream of the heavy wall pipe.

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25           7.3       Please provide a detailed assessment of the condition of the heavy wall  
26                      segments. Are the heavy wall segments more resistant to cracking and  
27                      corrosion that would require remediation action, less resistant, or the same as  
28                      any adjacent sections that are not of heavy wall construction?

29  
30           **Response:**

31           Heavy wall sections proposed for replacement through the CTS TIMC Project need to be  
32           replaced not because of their condition, but because of their contributing effect on speed  
33           excursions for downstream thinner wall pipe. FEI characterizes the condition of its heavy wall  
34           pipe segments as fit for service from a pressure-containment perspective, but as impeding its  
35           ability to collect in-line inspection data of sufficient quality. Heavy wall segments are not more  
36           resistant to cracking and corrosion; however, as they typically have lower stress levels than

<p style="text-align: center;">FortisBC Energy Inc. (FEI or the Company)</p> <p style="text-align: center;">Application for a Certificate of Public Convenience and Necessity (CPCN) for Approval of the Coastal Transmission System (CTS) Transmission Integrity Management Capabilities (TIMC) Project (Application)</p>	<p style="text-align: center;">Submission Date: July 27, 2021</p>
<p style="text-align: center;">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. 1</p>	<p style="text-align: center;">Page 18</p>



- 1 adjacent thinner wall pipe, they do have more resistance to failure (i.e., critical flaw sizes can be
- 2 relatively larger).
- 3

<p style="text-align: center;">FortisBC Energy Inc. (FEI or the Company)</p> <p style="text-align: center;">Application for a Certificate of Public Convenience and Necessity (CPCN) for Approval of the Coastal Transmission System (CTS) Transmission Integrity Management Capabilities (TIMC) Project (Application)</p>	<p style="text-align: center;">Submission Date: July 27, 2021</p>
<p>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. 1</p>	<p style="text-align: center;">Page 19</p>



1    **8.0    Reference:    Exhibit B-1, Section 5.5.3**

2            8.1    Please fully explain how the optimum velocity can be achieved.    Could the  
3            optimum velocity be achieved by choosing the season for the test, so it is not at  
4            peak season, with highest pressure, or lowest season with lowest pressure  
5            instead of implementing a Flow Control Station?  
6

7    **Response:**

8    Please refer to the response to BCUC IR1 18.1.

9



FortisBC Energy Inc. (FEI or the Company) Application for a Certificate of Public Convenience and Necessity (CPCN) for Approval of the Coastal Transmission System (CTS) Transmission Integrity Management Capabilities (TIMC) Project (Application)	Submission Date: July 27, 2021
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. 1	Page 20

1    **9.0    Reference:    Exhibit B-1, Table 5-9**

2                    **Preamble:**    In Table 5-9, FEI discusses the project schedule. A number of activities  
3                    are schedules prior to the CPCN approval.

4                    9.1    Please fully explain who, FEI or Customers, are responsible for any costs  
5                    incurred prior to CPCN approval, should the Commission deny such approval.

6  
7    **Response:**

8    The Project's Preliminary Stage Development Costs, Pre-Construction Development Costs, and  
9    Application Costs, which FEI incurs prior to approval of the Application, have been prudently  
10    incurred and are necessary expenditures to ensure the CPCN Application has been developed  
11    to the degree required by the BCUC's CPCN Guidelines, as well as to support the pipeline  
12    failure risk mitigation addressed by the Project. On this basis, these costs are recoverable from  
13    ratepayers.

14    Please also refer to the response to BCOAPO IR1 5.4.

15



FortisBC Energy Inc. (FEI or the Company) Application for a Certificate of Public Convenience and Necessity (CPCN) for Approval of the Coastal Transmission System (CTS) Transmission Integrity Management Capabilities (TIMC) Project (Application)	Submission Date: July 27, 2021
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1    **10.0 Reference: Exhibit B-1, Section 5.9.1**

2           10.1 In this section of the Application, FEI discusses Federal permits and  
3           environmental assessments. Please fully explain the nature of the permits and  
4           assessments and the impact on project timing if the approvals are (i) delayed, or  
5           (ii) denied.  
6

7    **Response:**

8    As described in Section 7.2 of the Application, FEI retained Stantec Consulting Ltd. to undertake  
9    a preliminary Environmental Overview Assessment (EOA). The results of this assessment  
10   identified the potential need for certain permits. Additional environmental studies are planned  
11   during the Project's detailed design phase to verify if all the permits identified in the preliminary  
12   EOA will ultimately be required.

13   In order to mitigate the risk of any permitting-related delay, FEI will undertake early engagement  
14   with stakeholders and Indigenous groups throughout the detailed design process to proactively  
15   identify permitting requirements and incorporate any feedback into the Project's design. FEI will  
16   also work with permitting agencies to confirm anticipated permit application review timelines and  
17   will prepare a detailed permit schedule that aligns with the Project schedule.

18   If the receipt of a permit is delayed, FEI will not commence planned construction in areas where  
19   that permit is required. Project schedule accounts for permits from the Ministry of Transportation  
20   and Infrastructure, Metro Vancouver, and CP Rail that are anticipated to have longer lead times  
21   (12 to 18 months) than the permits identified in Section 5.9.1 of the Application (6 to 12 months).  
22   Up to a 6 month delay in the permitting process would not impact the overall Project schedule.

23   In the unlikely event a permit is denied, FEI will work diligently with the applicable permit agency  
24   to resolve areas of concern. Again, FEI will not commence construction in an area until all  
25   relevant permits are obtained and the associated permitting requirements have been fulfilled.  
26



FortisBC Energy Inc. (FEI or the Company) Application for a Certificate of Public Convenience and Necessity (CPCN) for Approval of the Coastal Transmission System (CTS) Transmission Integrity Management Capabilities (TIMC) Project (Application)	Submission Date: July 27, 2021
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. 1	Page 22

1 **11.0 Reference: Exhibit B-1, Table 6-2**

2 11.1 In table 6-2, FEI lists costs as \$133.018 million in 2020 dollars and \$137.843  
3 million as spent. In confidential appendix G, in the "project costs" tab, the total as  
4 spent is different. Please fully explain the reason or reasons for this difference  
5 without making reference to any specific information subject to confidentiality  
6 constraints.

7  
8 **Response:**

9 FEI clarifies that the total project costs in as-spent dollars shown in Confidential Appendix G,  
10 Project Costs tab, is before the AFUDC and tax offset shown on Line 11 and 12 of Table 6-2 of  
11 the Application. Please refer to the table below which reconciles the as-spent dollars shown in  
12 Table 6-2 and in the Project Cost tab of Confidential Appendix G.

Line	Item	As-Spent (\$ millions)	Reference
1	Project Capital Costs	94.362	Table 6-2, Line 4
2	Contingency	15.624	Table 6-2, Line 6
3	Development and Deferral Costs	30.824	Table 6-2, Line 10
4	Total Project Cost before AFUDC and Tax Offset	140.810	Sum of Line 1 to 3; Conf. App. G, Project Cost tab
5	AFUDC	6.150	Table 6-2, Line 11
6	Tax Offset	(9.117)	Table 6-2, Line 12
7	Total Project Cost	137.843	Table 6-2, Line 13

13

14



FortisBC Energy Inc. (FEI or the Company) Application for a Certificate of Public Convenience and Necessity (CPCN) for Approval of the Coastal Transmission System (CTS) Transmission Integrity Management Capabilities (TIMC) Project (Application)	Submission Date: July 27, 2021
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1 **12.0 Reference: Exhibit B-1, Table 6-3**

2 12.1 Please confirm that "Capitalized Development Costs" of \$13.877 million will be  
3 included in FEI Rate Base. If not confirmed please fully explain.

4

5 **Response:**

6 Confirmed.

7

8

9

10 12.2 Please provide the criteria that FEI applied to allow the capitalization of  
11 development costs.

12

13 **Response:**

14 Consistent with the responses provided to BCUC IR1 21.1.1 related to the TIMC Deferral  
15 Account in the FEI Annual Review for 2019 Delivery Rates (excerpted below), the development  
16 costs in Table 6-3 have been assessed under US GAAP, including ASC 360, Property, Plant  
17 and Equipment, and ASC 970-340, Real Estate-Other Assets and Deferred Costs. The  
18 development costs in Table 6-3 have been determined to be outside of the preliminary phase,  
19 where costs are expensed or deferred, and part of the pre-construction phase. This phase is  
20 determined by a specific project being identified, management authorizing funding, financial  
21 resources being available to execute, and the probability that necessary conditions and  
22 regulations to construct the project will be met. In this phase, certain costs are eligible to be  
23 capitalized if they are directly attributable to the project. The costs that have been identified for  
24 capitalization are explained under Table 6-1 as being related to the quantitative risk assessment  
25 of FEI's transmission pipeline assets and EMAT inspection costs.

26 An excerpt from Exhibit B-3, Response to BCUC IR1 21.1.1 in the FEI Annual Review for 2019  
27 Delivery Rates proceeding is provided below:

28 21.1.1 As part of the above response, please identify which of the Phase 1  
29 costs would be classified as O&M and which would be classified as  
30 capital in accordance with US GAAP and why (in the absence of an  
31 approved deferral account).

32 **Response:**

33 As described in section 12.4.1.1 of the Annual Review for 2019 Rates filing, the  
34 expenditures for Phase 1 relate to "work to assess long-term system implications  
35 for adopting EMAT technology and to determine the scope of work". In the  
36 absence of an approved deferral account for a rate regulated entity such as FEI,



FortisBC Energy Inc. (FEI or the Company) Application for a Certificate of Public Convenience and Necessity (CPCN) for Approval of the Coastal Transmission System (CTS) Transmission Integrity Management Capabilities (TIMC) Project (Application)	Submission Date: July 27, 2021
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. 1	Page 24

1 the costs incurred during Phase 1 of the TIMC would generally be expected to be  
2 classified as O&M expenditures pursuant to US GAAP, including ASC 360  
3 Property, Plant and Equipment and ASC 970-340 Real Estate Other Assets and  
4 Deferred Costs.

5 The classification of Phase 2 costs between O&M and capital requires a degree  
6 of professional judgement when applying the accounting guidance. Once Phase  
7 1 has been completed, there is a high probability that this asset is required to be  
8 constructed. If this probability requirement is satisfied, the project is considered  
9 as part of the pre-acquisition phase under US GAAP, which in turn permits the  
10 capitalization of various project costs. Costs to develop the CPCN application  
11 may be classified as O&M in absence of a regulatory approved deferral account,  
12 while the front-end engineering design costs are likely to meet the capitalization  
13 criteria under US GAAP.

14  
15

16

17 12.3 Please confirm that TIMC Deferral Additions of \$13.243 million will not be  
18 included in rate base. If not confirmed please fully explain.

19

20 **Response:**

21 FEI confirms that, in the cost accumulation stage prior to BCUC approval, the TIMC Deferral  
22 Additions of \$13.243 million are recorded in a non-rate base deferral.

23 As noted in the response to BCUC IR1 26.2, FEI has amended the approvals sought for the  
24 non-rate base deferral to transfer to a rate base deferral on January 1, 2023, and to commence  
25 with amortization over a three-year period at that time.

26

27

28

29 12.4 If 12.3 above is confirmed, please fully explain why TIMC Deferral additions are  
30 not included in Rate Base.

31

32 **Response:**

33 Please refer to the response to BCOAPO IR1 12.3.

34

**Attachment 1.4**

---

BRITISH COLUMBIA HYDRO AND POWER AUTHORITY

Roebuck-Tilbury Loop  
Hydrostatic Test Procedure

*5714 man b. pipe*

PIPELINE PROOF TEST REPORT

Test Section *Svenson Station*

Date Test Completed *July 3 1981*

Location - From *Svenson Station* to *Roebuck Station*  
legal description legal description  
*NOT including both station.*

SPECIFICATION

The above hydrostatic proof test was carried out in accordance with HYDRO Specifications, Part 5. The results and calculations shown on the attached pipeline Test Report and on all pressure recorder and temperature recorder charts submitted in support of such Test Report, have been accurately calculated and reported.

*Wenta Mobile Air*  
(Name of Contractor)

PER: *L. J. ...*  
(Contractor's Representative)

B. C. HYDRO  
3777 Lougheed Highway  
Burnaby, B. C.

*... P. Eng*  
(Engineer)

Dated *July 3*, 19*81*

MINISTRY OF TRANSPORTATION  
AND HIGHWAYS  
ENGINEERING & INSPECTION BRANCH  
*K. ...*  
DATE: *July 26 1981*

## BRITISH COLUMBIA HYDRO AND POWER AUTHORITY

Roebuck-Tilbury Loop  
Hydrostatic Test Procedure

PIPELINE TEST REPORT - PAGE 1

GENERAL DESCRIPTION

Test Section 1 From Station Svensen To Station Roebuck  
 Length 1.5 M., 36" O.D., 8.92 W.T. Spec. GR414 MPa.  
 Test Point (T.P.) Elev. -0.2 Metres, High Point (H.P.) Elev. CSA 2248.2 M  
1073 Metres, Low Point (L.P.) Elev. -0.2 Metres  
 Reference Drawing No. GD 10340-45  
 Station Contractor Alberta Mobile Air NB Construction  
 Testing Contractor Tilbury North Air

TEST EQUIPMENT (Make/Serial No.)

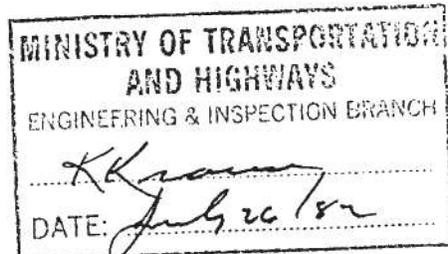
Pressure Recorder FFM 1193 Rembing  
 Dead Weight Tester M121-31 OFSCO  
 Temperature Recorder FM 1195  
 Pressure Dial Gauges - Fill End Roebuck 7050 KPa.  
 - Remote End Svensen 7210 KPa.  
 Compressor or Pump \_\_\_\_\_

TIME AND DATE OF TESTS

Filling - Start Nov 26 81 1300K Complete Dec 1 81 1900K.  
 Leak Test - Start Dec 1 81 Complete 1300 < Dec 2, 81  
 Proof Test - Start Dec 2 81 Complete 1800 K Dec 3/81.

PERSONNEL

Test Supervised By \_\_\_\_\_  
 Readings Taken By Don R. ...  
 Test Witnessed By ...  
 (ENGINEER)



BRITISH COLUMBIA HYDRO AND POWER AUTHORITY

Roebuck-Tilbury Loop  
Hydrostatic Test Procedure

PIPELINE TEST REPORT PAGE 2

Test Section Swenson  
Pipe O.D. 36"Ø  
Wall Thickness 8.92 mm  
Pipe Spec. CR 414 MPa  
CSA Z 245.2 M

LEAK REPORT

First Indication of Leak - Time N.C. Date \_\_\_\_\_

Nature of Indication \_\_\_\_\_

Phase of Test in which leak was indicated \_\_\_\_\_

Measured pressure at test point \_\_\_\_\_

Location of Leak - Time \_\_\_\_\_ Date \_\_\_\_\_

Method used to locate leak \_\_\_\_\_

Station and/or distance from nearest section line, and elevation of pipe \_\_\_\_\_

Nature of leak \_\_\_\_\_

Number of metres of pipe involved \_\_\_\_\_

Make sketch on back of this page \_\_\_\_\_

Repair of Leak Completed - Time \_\_\_\_\_ Date \_\_\_\_\_

How repair was made \_\_\_\_\_

Replaced with \_\_\_\_\_ Metres of \_\_\_\_\_ O.D. x \_\_\_\_\_ W.T. Pipe

Additional Remarks \_\_\_\_\_

Signatures:

[Signature]

(Test Supervisor)

(ENGINEER)

GR53L

Appendix IV - 10

MINISTRY OF TRANSPORTATION  
AND HIGHWAYS  
ENGINEERING & INSPECTION BRANCH  
[Signature]  
DATE: July 26/82

BRITISH COLUMBIA HYDRO AND POWER AUTHORITY

Roebuck-Tilbury Loop  
Hydrostatic Test Procedure

①

PIPELINE TEST REPORT - PAGE 3

Test Section Svenson - Roebuck  
 Pipe O.D. 36"  
 Wall Thickness 3.92 mm  
 Pipe Spec. R 41L MPA  
CSA 2245.2 M

24 Hour Proof Test (Log of Pressures and Temperatures)

Time (local)	Chart Pressure mPa	Dead-weight Pressure mPa	Temperature °C			Remarks
			Fill End	Remote End	Ambient	
3:40 pm	7455	7455			+6°	
4:45	7440	7440			+4°	in location
5:45	7440	7440			+2°	
6:45	7440	7440			+2°	
7:45	7435	7435			+2°	
8:45	7430	7430			0°	
9:45	7430	7430			0°	
10:45	7425	7425			-1°	
11:45	7420	7420			-1°	
12:45	7420	7420			-1°	
1:45	7420	7420			-1°	
2:45	7420	7420			+1°	
3:45	7420	7420			+1°	
4:45	7420	7420			+1°	

MINISTRY OF TRANSPORTATION  
 AND HIGHWAYS  
 ENGINEERING & INSPECTION BRANCH  
 K. K. ...  
 DATE: July 26/82

*[Handwritten signature]*

BRITISH COLUMBIA HYDRO AND POWER AUTHORITY

Roeback-Tilbury Loop  
Hydrostatic Test Procedure

(2)

PIPELINE TEST REPORT - PAGE 3

Dec 3/81

Test Section Enoch - Roeback  
 Pipe O.D. 36"  
 Wall Thickness 8.92 mm  
 Pipe Spec. C.R. 414 MPa  
CSA 7 243.2 M

24 Hour Proof Test (Log of Pressures and Temperatures)

Time (local)	Chart Pressure mPa	Dead-weight Pressure mPa	Temperature °C			Remarks
			Fill End	Remote End	Ambient	
5:45 am	7420	7420			+2	
6:45	7420	7420			+2	
7:45	7420	7420			+2	
8:45	7415	7415			+2	
9:45	7415	7415			+1	
10:45	7415	7415			+2°	
11:45 am	7415	7415			+2°	
12:15 pm	7415	7415			+2°	
1:45	7415	7415			+3°	
2:45	7415	7415			+3°	
3:45 pm	7415	7415			+3°	

MINISTRY OF TRANSPORTATION  
AND HIGHWAYS  
ENGINEERING & INSPECTION BRANCH  
*K. K. ...*  
DATE: *July 26/81*

*Handwritten signatures and notes at the bottom right of the page.*

Dec 3/81 Roibuck

12 noon	Pressure	7050 KPA
1 A.M.	"	7050 KPA
2 A.M.	"	7050 KPA
3 A.M.	"	7050 KPA

MINISTRY OF TRANSPORTATION  
AND HIGHWAYS  
ENGINEERING & INSPECTION BRANCH  
K. K. K.  
DATE: July 26/82

INSPECTOR'S PIPELINE REPORT

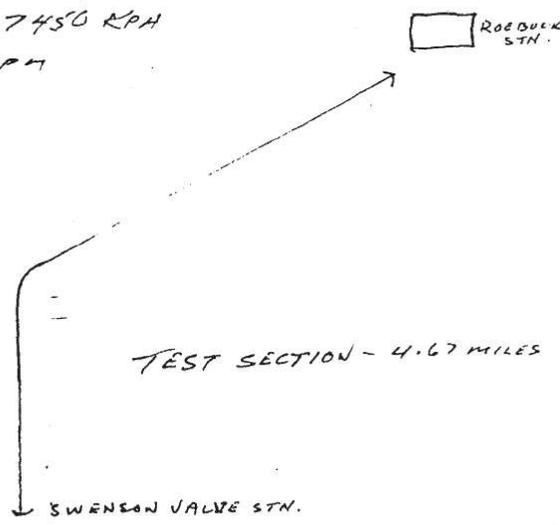
Attachment 1.4a

BC HYDRO  
 FACTOR H + B CONSTRUCTION  
 ECTOR  
 LD SURREY  
 OBJECT NO. 3286  
 RTIAL PRESSURE OR MOLE PERCENT H<sub>2</sub>S

SWENSON VALVE STN.  
 LOCATION SURREY - DELTA  
 PRODUCT NAT GAS

Line No.	Length	Diam.	Wall Thick.	Pipe Code	Pipe Grade	Sour Spec.	Exter. Coat.	Inter. Coat.	Depth of Cover	Class Location	Pressure of Weakest Element
1	4.67 MILES	36"	.350	245.2	414	-	POLYMER	EPOXY	30"	III	
2											
3											
4											
5											
6											

soil type DWT: - 7.455 KPA 3:45 PM TEMP - +6 - 3:45 PM  
 pipe weights CHART - READING: 7450 KPA  
 pipe anchors CHART ON AT - 3:50 PM  
 leaders and traps  
 Right-of-way width -  
 Valves - ANSI 300  
 Fittings ANSI - 300  
 pressure vessels  
 relief valve  
 pump  
 compressor  
 supports  
 cathodic protection  
 test leads  
 Condition of finished R.O.W.  
 pipeline elevation difference - 270'



road crossings  
 pipeline crossings  
 railway crossings  
 utility crossings  
 river or creek crossings

Piping Tests Date Dec 2/81 Test Medium WATER  
 Duration of test 24 HRS (minimum test pressure)  
 Test Pressure Variation test temperature variation

Welders:	Names	Ticket No.	Class
1.			
2.			
3.			
4.			

ALTA MOBILE AIR SERVICE Inspected by K. Keam  
 Date Dec 2/81



BRITISH COLUMBIA HYDRO AND POWER AUTHORITY

Reebuck-Tilbury Loop  
Hydrostatic Test Procedure

914 Pipe

PIPELINE PROOF TEST REPORT

Test Section Swenson Station

Date Test Completed \_\_\_\_\_ 19 81

Location - From Swenson Station to Tilbury Station  
legal description legal description  
include Tilbury station

SPECIFICATION

The above hydrostatic proof test was carried out in accordance with HYDRO Specifications, Part 5. The results and calculations shown on the attached pipeline Test Report and on all pressure recorder and temperature recorder charts submitted in support of such Test Report, have been accurately calculated and reported.

Alberta Mobile Inc.  
(Name of Contractor)

PER: [Signature]  
(Contractor's Representative)

B. C. HYDRO  
3777 Lougheed Highway  
Burnaby, B. C.

[Signature]  
(Engineer)

Dated Dec 9, 1981

M.C.T.H  
[Signature]

MINISTRY OF TRANSPORTATION  
AND HIGHWAYS  
ENGINEERING & INSPECTION BRANCH  
[Signature]  
DATE: July 26/82

BRITISH COLUMBIA HYDRO AND POWER AUTHORITY

Roebuck-Tilbury Loco  
Hydrostatic Test Procedure

PIPELINE TEST REPORT - PAGE 1

GENERAL DESCRIPTION

Test Section 2 From Station Svenson To Station Tilbury  
 Length          M., 36" na O.D., 9.72 na W.T. Spec. GR412 MP2  
 Test Point (T.P.) Elev. -0.2 Metres, High Point (H.P.) Elev. CSA 2245.2  
         Metres, Low Point (L.P.) Elev. -0.2 Metres  
 Reference Drawing No. CD 10340 - 45  
 Station Contractor HB Construction Ltd.  
 Testing Contractor Alberta Mobile Air

TEST EQUIPMENT (Make/Serial No.)

Pressure Recorder P.M. 1123 Rembina  
 Dead Weight Tester 14121-81 CPSLO  
 Temperature Recorder P.M. 1125  
 Pressure Dial Gauges - Fill End Svenson  
   - Remote End Tilbury  
 Compressor or Pump         

TIME AND DATE OF TESTS

Filling - Start	<u>Dec 4 / 81</u>	Complete	<u>Dec 6 / 81</u>
Leak Test - Start	<u>Dec 7 / 81</u>	Complete	<u>Dec 8 / 81</u>
Proof Test - Start	<u>Dec 8 / 81</u>	Complete	<u>Dec 9 / 81</u>

PERSONNEL

Test Supervised By [Signature]  
 Readings Taken By KEN RYAN IEMA  
 Test Witnessed By KEN KRUSE MOTH  
 (ENGINEER)

MINISTRY OF TRANSPORTATION  
 AND HIGHWAYS  
 ENGINEERING & INSPECTION BRANCH  
[Signature]  
 DATE: July 26 / 82

BRITISH COLUMBIA HYDRO AND POWER AUTHORITY

Roebuck-Tilbury Loop  
Hydrostatic Test Procedure

PIPELINE TEST REPORT PAGE 2

Test Section Swenson - Tilbury  
Pipe O.D. 36" Ø  
Wall Thickness 3.92 mm  
Pipe Spec. C/R 414 MPa  
CSA 2245.2 M

LEAK REPORT

First Indication of Leak - Time 0730 Date Dec 8/81  
Nature of Indication Leak at blind flange 12" stub & 4"  
Valve flange at end of Roebuck-Tilbury 6" flange test line  
Phase of Test in which leak was indicated at Swenson Station  
Measured pressure at test point 2500 MPa

Location of Leak - Time \_\_\_\_\_ Date \_\_\_\_\_

Method used to locate leak \_\_\_\_\_

Station and/or distance from nearest section line, and elevation of pipe \_\_\_\_\_

Nature of leak \_\_\_\_\_

Number of metres of pipe involved \_\_\_\_\_

Make sketch on back of this page \_\_\_\_\_

Repair of Leak Completed - Time 0900 Date Dec 8/81

How repair was made Weld on bolts, grease valve

Replaced with \_\_\_\_\_ Metres of \_\_\_\_\_ O.D. x \_\_\_\_\_ W.T. Pipe

Additional Remarks \_\_\_\_\_

Signatures:

MINISTRY OF TRANSPORTATION  
AND HIGHWAYS  
ENGINEERING & INSPECTION BRANCH  
K Krause  
DATE: July 24/82

[Signature]  
(Test Supervisor)

[Signature]  
(ENGINEER)

BRITISH COLUMBIA HYDRO AND POWER AUTHORITY

Roebuck-Tilbury Loop  
Hydrostatic Test Procedure

PIPELINE TEST REPORT - PAGE 3

*include Tilbury Site*

Test Section Svensen - Tilbury  
Pipe O.D. 36"  
Wall Thickness CSA 245.2M  
Pipe Spec. GR 114 HPR  
CSA 245.2M

24 Hour Proof Test (Log of Pressures and Temperatures)

*Dec 8/81*

Time (local)	Chart Pressure mPa	Dead-weight Pressure mPa	Temperature °C			Remarks
			Fill End	Remote End	Ambient	
10:30 am	7500	7450			4°	
11:30 am	7500	7445			6°	
12:30	7495	7445			7°	
1:30 pm	7495	7440			7°	
2:30 pm	7490	7440			7°	
3:30	7490	7440			6°	
4:30	7485	7440			5°	
5:30	7485	7440			4°	
6:30	7485	7440			4°	
7:30	7485	7440			4°	
8:30	7485	7435			4°	
9:30	7485	7435			4°	
10:30	7485	7435			4°	
11:30	7485	7435			3°	

GR52L

Appendix IV - 11

**MINISTRY OF TRANSPORTATION AND HIGHWAYS**  
ENGINEERING & INSPECTION BRANCH  
*K. K...*  
DATE: *July 26/82*

BRITISH COLUMBIA HYDRO AND POWER AUTHORITY

Roebuck-Tilbury Loop  
Hydrostatic Test Procedure

PIPELINE TEST REPORT - PAGE 3

(2)

Test Section \_\_\_\_\_  
Pipe O.D. \_\_\_\_\_  
Wall Thickness \_\_\_\_\_  
Pipe Spec. \_\_\_\_\_

24 Hour Proof Test (Log of Pressures and Temperatures)

Dec 7/81

Time (local)	Chart Pressure mPa	Dead-weight Pressure mPa	Temperature °C			Remarks
			Fill End	Remote End	Ambient	
12:30	7435	7435			3°	
1:30	2m 7435	7435			3°	
2:30	7435	7435			3°	
3:30	7435	7435			2°	
4:30	7435	7435			2°	
5:30	7435	7430			2°	
6:30	7435	7430			4°	
7:30	7435	7430			4°	
8:30	7435	7425			4°	
9:30	7435	7425			4°	
10:30	2m 7435	7425			4°	

*[Handwritten signature]*

GR58L

MINISTRY OF TRANSPORTATION  
AND HIGHWAYS  
ENGINEERING & INSPECTION BRANCH

*[Signature]*

DATE: *July 21/81*

- 11

NOTED  
*[Signature]*  
*[Signature]*

COMPANY BC HYDRO  
 CONTRACTOR H&B CONST  
 INSPECTOR VINCE YUNG  
 FIELD SURREY  
 PROJECT NO. 3286  
 PARTIAL PRESSURE OR MOLE PERCENT H<sub>2</sub>S

LOCATION SWENSON VALVE STN  
 PRODUCT NAT GAS

Line No.	Length	Diam.	Wall Thick.	Pipe Code	Pipe Grade	Sour Spec.	Exter. Coat.	Inter. Coat.	Depth of Cover	Class Location	Pressure of Weakest Ele
1	3.29 miles	36"	.850	245-20	414	-	POLYKEN	EPOXY	20'	III	
2											
3											
4											
5											
6											

soil type DEC 8/81 DWT 7450 kPa 10:30 AM - CHART ON 10:30 AM  
 pipe weights CHART READING 7500 kPa  
 pipe anchors GROUND TEMP. 2.7°C  
 headers and traps PIPE TEMP - 4.5°C

Right-of-way width DEC 9/81 - DWT - 10:30 AM - 7425 kPa  
 Valves PIPE TEMP. 4.8°C  
 Fittings GRD TEMP. 3.0°C

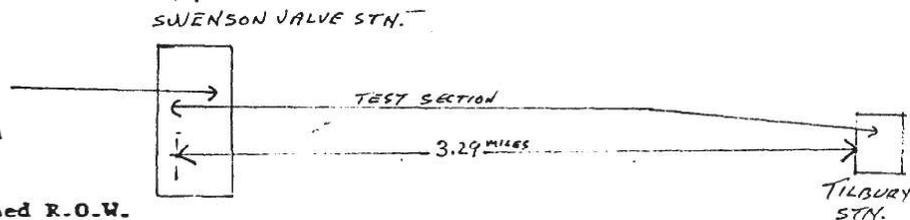
pressure vessels  
 relief valve

pump  
 compressor

supports  
 cathodic protection  
 test leads

condition of finished R.O.W.  
 pipeline elevation difference

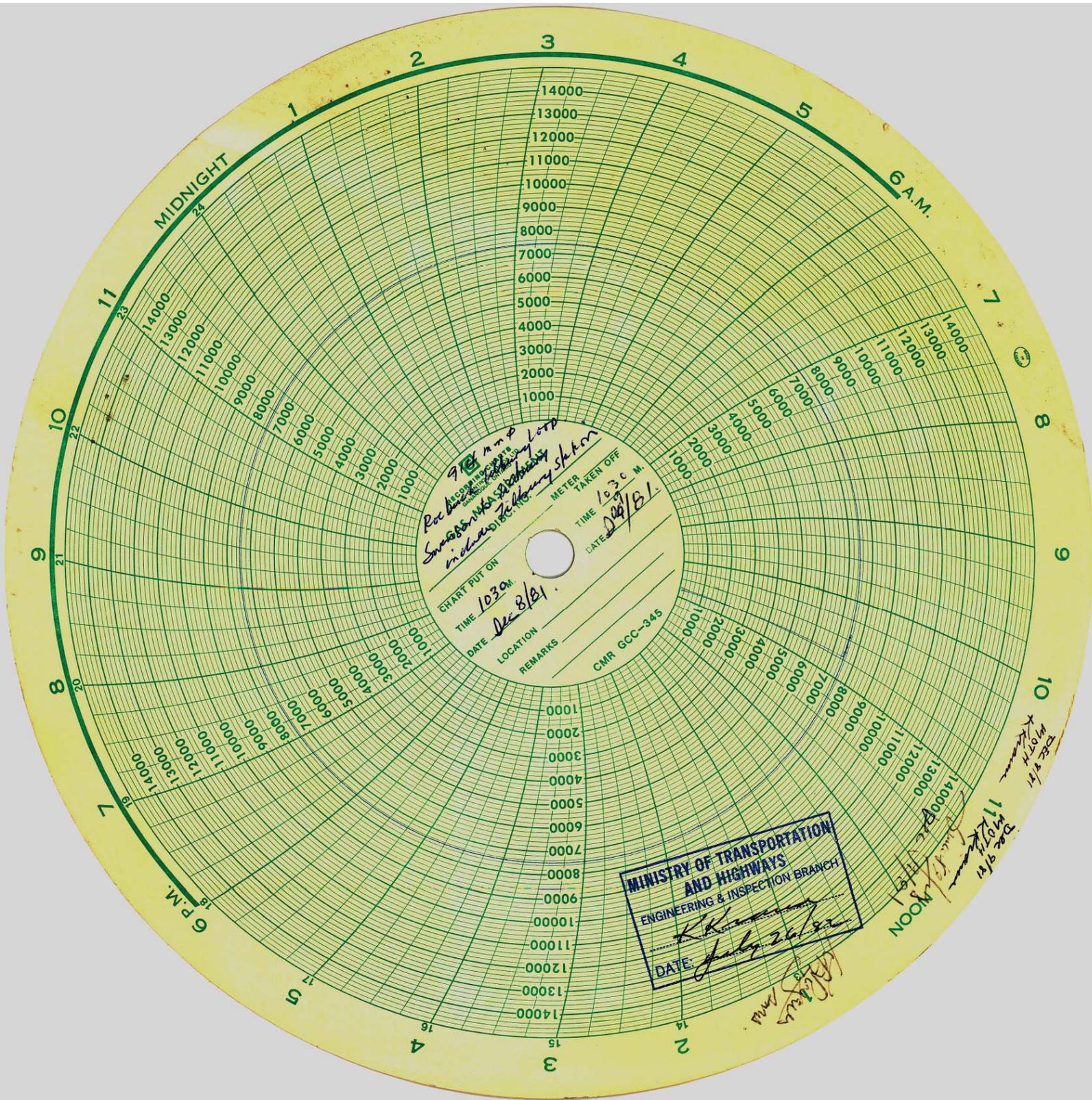
road crossings  
 pipeline crossings  
 railway crossings  
 utility crossings  
 river or creek crossings



Piping Tests Date DEC 9/81 Test Medium WATER  
 Duration of test 24 HRS (minimum test pressure)  
 Test Pressure Variation 25 kPa test temperature variation .3°C

Welders:	Races	Ticket No.	Class
1.			
2.			
3.			
4.			

Inspected by A. Leamer  
 Date Dec 8/81



**FAX COVER SHEET**

**To:** Pipeline and Facilities Safety and Engineering Group  
 Compliance and Enforcement **Branch**  
**Oil and Gas Commission**  
 200 10003 110 Ave.  
 Fort St. John BC V1J 6M7

**From:** J. Lavers. P.Eng  
 BC Gas Utility Ltd.  
 Engineering  
 16705 Fraser Highway  
 Surrey, British Columbia  
 Canada V3S 2X7

Bus (604) 592-7745  
 Fax (604) 592-7530

**Fax:** 250-261-5787

**Date:** 30/08/02

This message consists of  1  page

**Attn:** Mr. Richard Caesar. Pipelines/Facilities, Safety & Engr

**Subject:** Request for **LEAVE TO OPEN**

**Pipeline:** Alpha/Dominion Site Reinstatement – Heavy Wall Replacements – Delta, B.C.

**Certificate #** 45-1085

**Project #** 10707

BC Gas Utility Ltd. requests permission to operate the above noted Pipeline(s).

Parameters for this pipeline test are as follows:

	<i>914 mm OD Replacement (700m)</i>	<i>610 mm OD Replacement (700m)</i>
Date Of Test	02-07-17	02-08-10 (
Duration of test	4 hours	4 hours
Minimum Test Pressure	6196 kPa	6468 kPa
Maximum Test Pressure	6202 kPa	6944 kPa
Test Witnessed By	Ken Krause , OGC	Joel Lavers, BCG
M.O.P. requested	4020 kPa	4020 kPa

All applicable charts and as-built data will be forwarded to your office no later than 90 days.

All safety equipment has been tested.

Notification of your approval may be made by return facsimile to 604 - 592-7530

Yours truly,



Joel Lavers, P. Eng

Project Manager

**FAXED**  
 08/30/02



Naturally Resourceful

Preparation Date:  
04/29/02

# TRANSMISSION PIPELINE VALVE STATION HYDROSTATIC TEST SPECIFICATION

Alpha-Dominion Site Reinstatement Project

Certificate Number

Project Number

Pre-Test Number

- P-00032.6.2

System Description - NPS 24 / 36 Transmission Pipelines

Location - Alpha-Dominion Site, Delta, BC

Test Equipment Location- Alpha-Dominion Site, Delta, BC

Ref. Drawing # 42010-P-800-300-R0

WBS / I/O # P-00032.6.2

## Pipe Specification Data

No	Type	Quantity	Length (m)	OD (mm)	WT (mm)	Grade (MPa)	Factor	Design Pressure (kPa)	MOP (kPa)	Min Test Pressure (kPa)	90% SMYS Pressure (kPa)
1	Pipe	N/A	2.4	914	8.92	414	0.5	4039	4033	5648	7269
2	Pipe	N/A	695.3	914	14.3	448	0.5	7006	4033	5648	12811
1	Pipe	N/A	2.4	610	9.5	483	0.5	7527	4033	5648	13549
2	Pipe	N/A	173.0	610	12.6	483	0.5	9983	4033	5648	17970
3	Pipe	N/A	524.8	610	17.5	414	0.5	11885	4033	5648	21393

## Calculated Test Pressures

Elevation Effects	High Point (H) 5.0	Test Point 0.0	Low Point (h) 0.0	$\Delta P(H) = 49.033$ kPa	$\Delta P(h) = 0.0$ kPa
-------------------	-----------------------	-------------------	----------------------	----------------------------	-------------------------

Note ;  $\Delta P(H) = 9.8066 \times (\Delta H)$ ;  $\Delta H = (h - h_{tp})$ 

Minimum Specified Test Pressure @ Test Point	OD 914 mm: 5695 (kPa)	OD 610 mm: 5695 (kPa)	Duration: Below grade - <del>24hrs</del> 4hrs
Maximum Specified Test Pressure @ Test Point	OD 914 mm: 7269 (kPa)	OD 610 mm: 13549 (kPa)	
M.E. Bloom	EIT	J.E. Lavers	P. Eng
Prepared By (Print Name)	Approved By (Print Name)		
Prepared By (Signature)	Approved By (Signature)		
Project Engineer, EIT, Engineering Services	Project Manager, Engineering Services		

Min 5695 H<sub>2</sub>O  
 Max 7300 kPa. 4hrs.  
 00 pm Joel. aug 9 '02.

## HYDROSTATIC PRESSURE TEST LOG SHEET

Procedure Information		
Test Date: <u>JULY 17/02</u>	Test Supervisor:	Work Order Number: <u>P00032.6.2</u>
Test Duration (min): <u>4 HRS</u>	Maximum Test Pressure: <u>7269 kPa</u>	Minimum Test Pressure: <u>5695 kPa</u>
Test Location: <u>ALPHA DOMINION SITE DELTA B.C.</u>		

Instrument Data	
Pressure Recorder Serial #: <u>242 EC-9466156</u>	Temperature Recorder Serial No. <u>SAME</u>
Deadweight Tester Serial #: <u>6101609002</u>	Thermometer Serial #: <u>J01004029</u>
Transducer #: <u>1</u>	Pressure Relief Valve Serial #
Transducer Range: <u>0-3000 PSIG</u>	Pressure Relief Valve Set Pressure:

7.0 Test Data						
Test Date (Yr/Mth/Day)	Test Point Readings					Remarks
	Ddwt.	Recorder Pressure	Recorder Pipe Temp.	Therm. Reading	Amb.	
Time	(kPa)	(kPa)	(°C)	(°C)	(°C)	
Start: <u>7:10 PM</u>	<u>6196</u>	<u>6200</u>	<u>21</u>	<u>20.2</u>	<u>21.9</u>	
Finish: <u>11:08</u>	<u>6202</u>	<u>6200</u> <del>6200</del>	<u>18.7</u>	<u>18.7</u>	<u>16.8</u>	

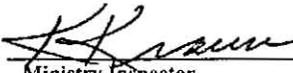
Comments:

WALTER OSADUK  
Recorded By (PRINT Name)

  
Recorded By (Signature)

IMST TECH  
Title

BC Gas Supervisor

  
Ministry Inspector

# Pressure Test Service Form

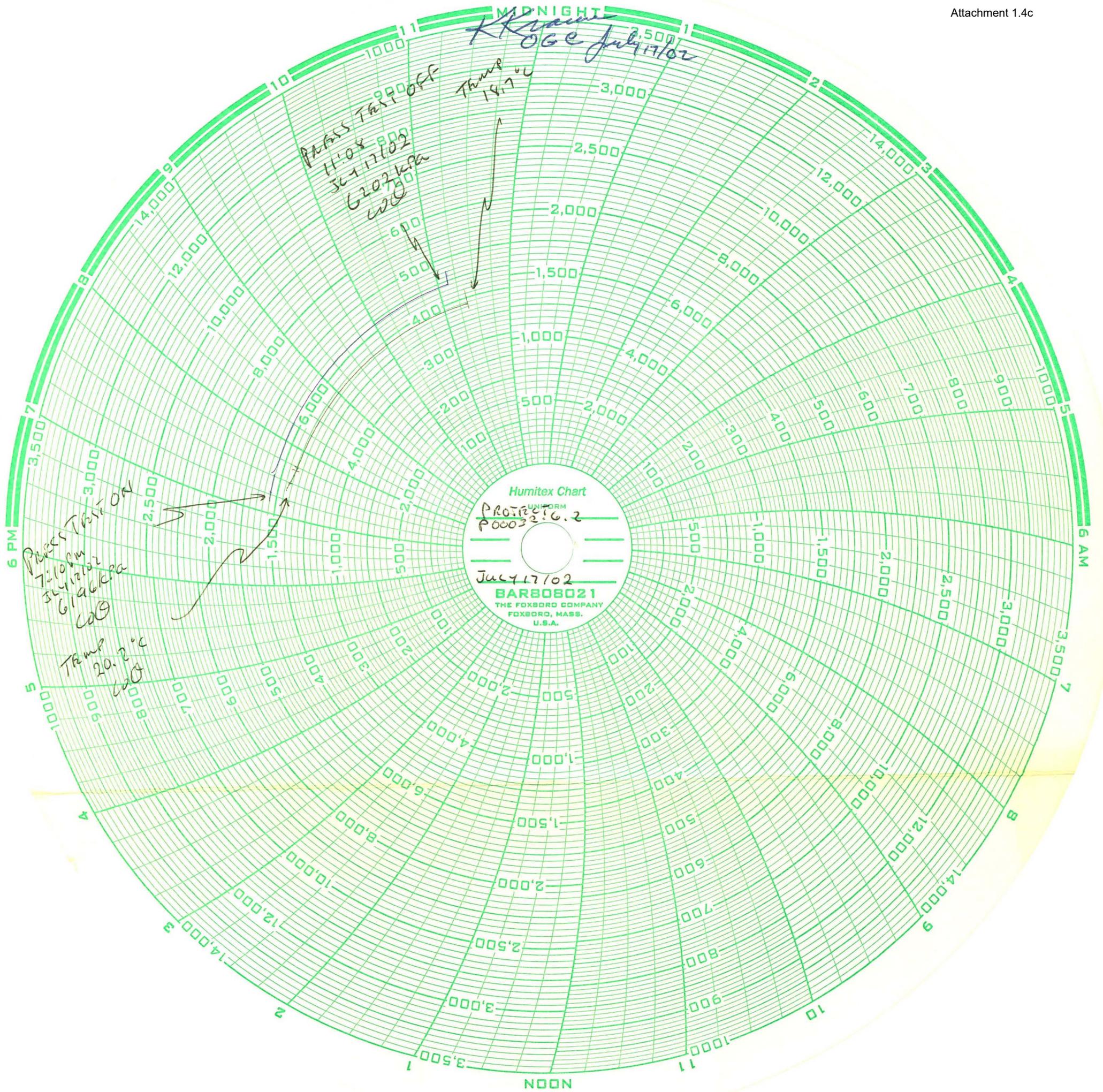
Date: JULY 17/02

WORK ORDER INFORMATION	TEST EQUIPMENT
WO# <u>P00032.6.2</u>	PRESSURE RECORDER # <u>S/M 242PC-9406156 916</u>
LOCATION: <u>ALPHA-DOMINION SITE</u>	TEMPERATURE RECORDER# <u>5mm6</u>
<u>DELTA B.C.</u>	
JOB SUPERVISOR: <u>JORG LAUFERS</u>	DWT TESTER # <u>S/M 601609002</u> <u>15370</u>
	TRANSDUCER # <u>1</u>
MINIMUM PRESSURE: <u>5695 kPa</u>	
MAXIMUM PRESSURE: <u>7269 kPa</u>	TRANSDUCER RANGE: <u>0-3000 PSI</u>
TEST MEDIUM: <u>H2O</u> <u>N<sub>2</sub></u>	
	THERMOMETER SERIAL # <u>301004029</u>
MINIMUM DURATION: <u>4 HRS</u>	

TEST DATA	
START TIME: <u>7:10 PM</u>	FINISH TIME: <u>11:10</u>
DWT PRESSURE: <u>6196</u>	DWT PRESSURE: <u>6202 kPa</u>
RECORDER PRESSURE: <u>6200</u>	RECORDER PRESSURE: <u>6200 kPa</u>
THERMOMETER READING: <u>20.2°C</u>	THERMOMETER READING: <u>18.7°C</u>
RECORDER TEMPERATURE: <u>21°C</u>	RECORDER TEMPERATURE: <u>18.7°C</u>

COMMENTS:

Technologist: W OSADUK



FOXBORO BACK PRINTING NO. 1610



## INSTALLATION TEST RECORD

TOWN/CITY DELTA		LOCATION ALPHA-Dominion SITE			
Recorder number 916	Range 0-14000 kPa	Test Method Air <input checked="" type="checkbox"/> Hydrostatic Nitrogen		Weather WARM, OVERCAST	
Job Number P00032.6.2		Ministry Project Number		Ministry Certificate Number	
Pipe: size length <input type="checkbox"/> PE <input type="checkbox"/> ST	Pipe: size length <input type="checkbox"/> PE <input type="checkbox"/> ST	Pipe: size length <input type="checkbox"/> PE <input type="checkbox"/> ST		Pipe: size length <input type="checkbox"/> PE <input type="checkbox"/> ST	
Test on Time 7:10 <input type="checkbox"/> AM <input checked="" type="checkbox"/> PM Date (yr/mo/day) 02/07/17		Test off Time 11:10 <input type="checkbox"/> AM <input checked="" type="checkbox"/> PM Date (yr/mo/day) 02/07/17			
Welder/Fuser (PRINT Name)			Certificate/Registration Number		

## COMMENTS

PRESSURE/TEMPERATURE RECORDER COMBINED SIM 242PC-9406156  
 TEMP RANGE -20 TO +80°C  
 PRESSURE DWT INSTRUMENT DRUCK D.P.1.610 SIM 6101609002 15370  
 TEMP INSTRUMENT BARNANT LOGR SIM J01004029 15383  
 DWT TECHNICIAN W. OSADNIK ICS DEPT

I hereby certify that the pipe noted above was installed to current BC Gas Inc. standards and that no leakage was found.

.....  
Crew Leader/DMI

.....  
Inspector

.....  
Supervisor

1610 94/08

.....  
Date (yr/mo/day)

.....  
Date (yr/mo/day)

.....  
Date (yr/mo/day)

arc 3158