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September 28, 2021

Movement of United Professionals
c/o Allevato Quail & Roy, Barristers and Solicitors
405-510 West Hastings St.
Vancouver, BC
V6B 1L8

Attention: Mr. Jim Quail

Dear Mr. Quail

Re: FortisBC Energy Inc. (FEI)
Project No. 1599232
Annual Review for 2022 Delivery Rates (Application)
Response to Canadian Office and Professional Employees Union, Local 378
(known as Movement of United Professionals or MoveUP) Information Request
(IR) No. 1

On July 30, 2021, FEI filed the Application referenced above. In accordance with the regulatory timetable established in British Columbia Utilities Commission Order G-277-21 for the review of the Application, FEI respectfully submits the attached response to MoveUP 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 Demand Forecast**

2 **1.1 Residential Customer Additions**

3 **Reference: Application p. 14-15 and Table 3-2**

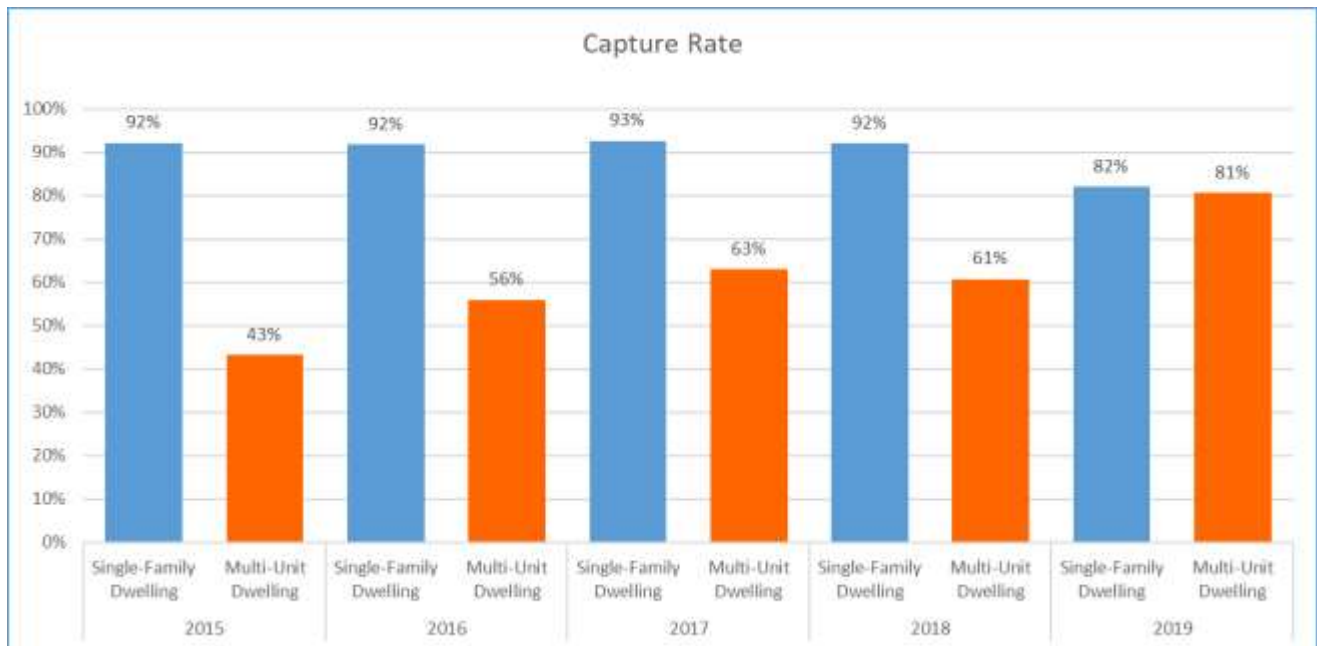
4 Consistent with past practice, FEI uses the Conference Board of Canada (CBOC) housing
 5 starts forecast as a proxy for residential net customer additions.

6 1.1.1 Does FEI track its penetration rate in relation to new and pending housing starts?
 7 If not, why not? If yes, please provide a table showing the percentage of housing
 8 starts that generate customer additions in each of the past five years, broken down
 9 as between single- family dwellings and multi-unit dwellings.

10

11 **Response:**

12 FEI does not capture penetration rates on new and pending housing starts using the Conference
 13 Board of Canada (COBC) housing data as it is not possible to have a penetration rate for a
 14 building that has not yet started construction. However, as a lagging indicator, FEI does track the
 15 Capture Rate which is the number of new customers attached to new properties in a given year
 16 based upon when the foundation was poured. For example, rather than determining a penetration
 17 rate of forecast housing starts, the Capture Rate looks at penetration rates of actual housing starts
 18 and completions. The Capture Rate calculation is the new customer attachments divided by the
 19 new completions. The data used comes from BC Assessment and from data in FEI's systems,
 20 and is shown in the chart below.



21

22 **Notes to table:**

- 23 (1) Municipalities not served in the FEI service area are excluded.
 24 (2) Condominium buildings, not units, are included in the Capture Rate calculation.

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1.1.2 Has FEI identified regional differentiations in its new housing penetration rates over this period? If so please discuss.

Response:

Many factors affect the Capture Rate, including building type and geography. Overall, the Capture Rate has started to decline in municipalities that have more stringent climate policies that natural gas is not able to meet. Conversely, the Capture Rate has been higher in jurisdictions with faster overall housing completions.

1.1.3 What if any impact has FEI detected of the City of Vancouver’s climate action policies upon FEI’s penetration of new and pending residential and commercial developments in the City? What impacts does FEI anticipate?

Response:

The City of Vancouver’s climate action policies will have a significant impact on FEI’s penetration of new and existing customers in the city; the full impact of which has yet to be realized and will affect net additions over time.

The City of Vancouver’s Zero Emissions Building plan was developed in 2016 with the goal to reduce 100% of GHG emissions from new buildings by 2030 from the 2007 baseline. The plan establishes Greenhouse Gas (GHG) and thermal energy demand intensity targets by building type with the intention to bring these down to zero emissions over time. Building scale greenhouse gas emissions are measured in kg CO₂e/m² per year and since these are emissions per unit area they are referred to as greenhouse gas intensity or GHGI¹. Incrementally lowering GHGI limits in policy and regulation is the cornerstone of this plan. The city introduced GHGI levels into rezoning or the Vancouver Building Bylaw and for many building archetypes, including high rise multi-unit residential buildings (MURBs), low rise MURBS, single family homes. The GHGI levels set are too low to be met with emissions from the use of natural gas in these buildings for space and water heating use.

¹ GHGI is determined by the total amount of energy supplied to the building by type (electricity, natural gas, hot water or steam) multiplied by the energy’s carbon intensity (a measure of how much greenhouse gas emissions are associated with its use). This overall operational GHG emission total is then divided by the building area to calculate GHGI.



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1 On November 17, 2020, the City of Vancouver council approved the Climate Emergency Action
2 Plan. The plan focuses on reducing carbon emissions from natural gas in buildings, from heating
3 and hot water. The city’s Climate Emergency Action Plan is characterized by way of 6 Big Moves.
4 Big Move 4 is described as zero emissions space and hot water heating and the objective is to
5 reduce building operations emissions in half from the 2007 levels by 2030, focusing on making
6 existing buildings more energy efficient and switching their space heating and hot water systems
7 to renewable energy. By January 2022, all new residential buildings must meet a GHGI threshold
8 that cannot be met by natural gas. To meet the requirement, a newly constructed building could
9 use renewable natural gas but the offering would require the building to use RNG for its life. No
10 current FEI RNG offerings meet this Vancouver requirement and, as such, it is expected that there
11 will be very few new attachments in Vancouver after 2022 (note that these policies are similar to
12 other jurisdictions such as the District of North Vancouver). By 2025, all new and replacement
13 heating and hot water systems will be zero emissions in Vancouver. To achieve this goal, the
14 City of Vancouver is promoting replacing residential gas appliances reaching the end of life with
15 electric equivalents such as heat pumps. This will have a significant impact on existing
16 attachments that are forced to replace gas equipment with electric equipment.

17 Generally, since 2016, as a result of the climate action policies the City of Vancouver has
18 implemented, FEI is finding it increasingly more difficult to penetrate the new residential and
19 commercial builds within the City of Vancouver. Under the current policies implemented by the
20 City of Vancouver it is technically still possible to connect a new home to a gas service, although
21 the home will not have the option of gas space or water heating equipment. This results in a
22 significant decrease in the throughput related to new homes. Since the cost of installing mains in
23 new development can no longer be fully offset by the gas throughput, the cost to the builder
24 becomes prohibitive to include gas appliances. It is also important to note that a number of
25 neighboring municipalities have adopted similar policies, with similar limiting effects. FEI
26 continues to monitor these policies and the impact they will have on potential customers’ ability
27 to connect to gas or for existing customers to remain with gas service when they upgrade.

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1 **2.0 Impact of COVID-19 Pandemic**

2 **Reference p. 67:**

3 While the current outlook regarding the COVID-19 pandemic in BC is positive, with
4 resumption of normal operating conditions expected later this year, coinciding with the
5 Province achieving Step 4 of the Province of BC Four Step Restart Plan, the financial
6 effects of the COVID-19 pandemic on customers' ability to make payments may remain
7 for some time afterwards.

8 **And reference: p. 133**

9 To date in 2021, FEI is continuing to incur additional expenditures to manage the impact
10 of the COVID-19 pandemic. The nature of the costs being incurred is similar to that
11 observed in 2020 and includes costs for activities in Field Operations, Public Affairs
12 Emergency Team and Communications and Facilities. FEI expects to continue to incur
13 additional expenditures to approximately when Step 4 of the Province of BC Four Step
14 Restart Plan begins, at which time the majority of incremental expenditures related to the
15 COVID-19 pandemic, except for expenditures related to the Company's reintegration
16 efforts, will have occurred. FEI is also monitoring for any significant cost reductions related
17 to COVID-19 such as a continued temporary reduction in employee-related expenses that
18 may help to offset the incremental expenditures. Additionally, FEI is continuing to track the
19 reduction in Late Payment Charges due to the COVID-19 pandemic.

20 ***And reference B.C. may not move to Step 4 by Sept. 7 as COVID-19 case counts***
21 ***increase: Dr. Henry Vancouver Sun August 20 2021² -***

22 "British Columbia may not advance as expected to the next step in its COVID-19 restart
23 plan as case counts surge in the Interior Health region, the province's top doctor says.

24 "As provincial health officer Dr. Bonnie Henry was announcing tighter restrictions to cover
25 all of the Interior Health region, she said it won't be a surprise if the province doesn't
26 advance to Step 4 in September."

27 (We note that the Application is dated July 30, 2021.)

28 2.1 Please update the current status of the Province of BC's "Restart Plan" and its
29 relationship with FEI's expectations in relation to the resumption of "normal
30 operating conditions . . . later this year", with particular reference to conditions
31 within FBC's service territory and in communities where shared service operations
32 are located.

33
34 **Response:**

35 The Province of BC's Restart Plan is currently on pause due to remaining Provincial restrictions
36 in place to help stop the spread of COVID-19. FEI considers that normal operating conditions
37 can be supported once all Provincial restrictions are lifted, normal social contact is in place, and

² <https://vancouver.sun.com/news/local-news/covid-19-increase-in-b-c-covid-19-cases-prompts-restrictions-in-interior-health>



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1 workplaces are fully opened with no capacity and/or use constraints. The conditions for the
2 restrictions are expected to be evaluated in the coming months by the Province.

3 While normal operating conditions may not yet be present, FEI has taken several steps on the
4 path towards normal operations. More specifically, a formal return to site for employees that had
5 been working remotely during the COVID-19 pandemic began in September.³ Throughout
6 September and October, FortisBC’s M&E, MoveUP and MoveUP CSC employees are
7 commencing a return to site with an occupancy guideline of 50 percent so employees can take
8 advantage of in-person interactions and collaboration in their daily work routines. This includes
9 offices and worksites throughout FEI’s service territory, including the communities within service
10 areas shared with FBC, and 100 percent of these employees are expected to spend some time
11 onsite. In addition, access to sites for customers and visitors is expected to begin later in
12 September and early October.

13 When in the offices and worksites, similar to the practice throughout the pandemic, the Company
14 will be rigorously following government guidelines and taking a conservative approach in its
15 response to ensure the safety of employees, customers and communities. Consistent with this, a
16 number of safety measures and protocols are in place to keep employees and customers safe.

17
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19

20 2.2 Please outline the anticipated operational and financial impacts of a delay in
21 attaining “normal operating conditions” beyond the timeframe anticipated in the
22 Application.

23

24 **Response:**

25 FEI anticipates that its move to start having its employees return to the office and worksites as
26 described in the response to MoveUP IR1 2.1 should lessen the operational and financial impacts
27 of a delay in attaining “normal operating conditions” associated with Step 4 of the Province’s
28 Restart plan; however, actual impacts will be dependent on the progression of the pandemic. As
29 conditions for FEI are getting closer to normal, and with the expected resumption of normal
30 operating conditions possibly later this year, the Company will be in a position to report to the
31 BCUC on the 2020 and 2021 net incremental O&M costs and reduced Late Payment Charges as
32 part of the Annual Review for 2023 Delivery Rates Application.

³ While a portion of employees had remained working from site to support business needs throughout the pandemic, commencing in June employees were invited to voluntarily return to site from time to time under an overall occupancy guideline of 50 percent.



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1 **3.0 Service Quality Indicators**

2 **3.1 Optimization of Call Centre Services to Customers**

3 3.1.1 Please describe the measures pursued by FortisBC to optimize the performance
4 and co-ordination of its customer care operations in relation to its other operational
5 functions and divisions. Please discuss the extent to which shared services
6 contribute to these objectives, and opportunities identified by FortisBC to further
7 enhance customer care.

8
9 **Response:**

10 Each year Customer Service sets departmental objectives that are in support of overall Company
11 objectives and takes into consideration opportunities that have been identified to improve or
12 maintain the current high level of service quality. Customer Service considers industry best
13 practices, customer research, performance metrics and feedback from customers attained
14 through after-interaction surveys to support the identification of opportunities to optimize overall
15 performance and customer experience that are aligned with Company goals and objectives.

16 Depending on the opportunities identified, Customer Service works closely with other
17 departments that influence and support the overall customer experience. This often includes but
18 is not limited to departments such as Information Systems, External Communications, Energy
19 Solutions and Operations. As such, the extent to which shared services groups contribute to
20 Customer Service initiatives and objectives is dependent on the initiative identified and may vary.
21 However, ongoing foundational support from other shared service groups remains consistent year
22 to year for services such as finance and accounting, human resources and information systems.

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26 **3.2 All-injury Frequency Rate**

27 **Reference: Application Table 13-4 and p. 152-153**

28 3.2.1 Please provide a table showing, with respect to each relevant injury, the month
29 and year in which it occurred, the work location where it occurred, the general
30 nature of the incident, the employee status of the injured person (Excluded,
31 MoveUP or IBEW), and the measures taken to avoid recurrence.

32

33 **Response:**

34 The following table includes all relevant injuries up to and including June 2021.

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| Month / Year | Work Location | General Nature of Injury | Status | Measures Taken to Avoid Recurrence |
|--------------|--------------------------------|--------------------------|--------|--|
| Jan-2021 | Prince George | Cut, Puncture, Scrape | IBEW | <ul style="list-style-type: none"> Communicate the event to Zone 4 JHSC during the next scheduled safety meeting highlighting the importance of controlling icy conditions on the running board by using mud flaps. Ensure PMT installs mud flaps on truck 8281. Review the event during the next scheduled safety meeting highlighting the importance of controlling icy conditions on the running board by using mud flaps. |
| Jan-2021 | Not Applicable (gradual onset) | Sprain, Strain or Tear | IBEW | <ul style="list-style-type: none"> Review the event during the next scheduled safety meeting focusing on the use of bigger tools, snipes or other methods for more strenuous tasks to gain leverage. Encourage the team to conduct daily stretches at their own discretion. |
| Jan-2021 | Surrey | Sprain, Strain or Tear | IBEW | <ul style="list-style-type: none"> Ensure employees are able to access all job aids relevant to their job via computer and provide HIRA Customer Service technician the JHA booklets. Assemble a learning team of employees, managers, OH&S representatives and JOH&S representatives to evaluate CST's everyday activities and ensure they aligned with the CST ergonomic coaching program. Review the incident and site visit findings at the next safety meeting/tailgate meeting. Review with employees, managers, and OH&S representatives to determine if there is a need to equip CST's with 36" aluminum pipe wrenches. |
| Jan-2021 | Surrey | Sprain, Strain or Tear | IBEW | <ul style="list-style-type: none"> Reminder to employee to complete stretching prior to performing physical work and follow the safe working procedures for the task. Review of the ergonomic assessment and provision of preventative education. Employee felt discomfort and continued to work until the end of the day before the injury was reported. The discomfort continued over a period of time but this was not communicated to the Supervisor. The corrective action was to review reporting requirements to ensure employees who report initial discomfort are provided with alternative work arrangements so the injury is managed and does not progress in severity. |
| Feb-2021 | Chilliwack | Sprain, Strain or Tear | IBEW | <ul style="list-style-type: none"> Conduct a physical demands analysis with OHS in the use of the line tamer and develop task-specific move safe exercises. Organize a training session with the manufacturer in the proper use of the line tamer. |
| Feb-2021 | Kelowna | Sprain, Strain or Tear | IBEW | <ul style="list-style-type: none"> Organize a Physiotherapist session to educate CST group about the importance of warming up and exercising. Review CSTs tools and make recommendations. Ensure required tools are available (snipes, larger pipe wrench, lubricant to loosen joints etc.). Review the event during the next scheduled safety meeting focusing on exercising caution with strenuous activities in extreme temperatures. |

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| Month / Year | Work Location | General Nature of Injury | Status | Measures Taken to Avoid Recurrence |
|--------------|----------------|--------------------------|--------|---|
| Feb-2021 | Langford | Sprain, Strain or Tear | IBEW | <ul style="list-style-type: none"> Assess options for access and egress aids into trenches and bell holes. Review the event during the next scheduled safety meeting focusing on exercising caution when entering excavations, reminding workers of the importance of move safe and stretch before strenuous activities to prevent injury. |
| Feb-2021 | Kamloops | Sprain, Strain or Tear | MoveUp | <ul style="list-style-type: none"> Revise mail system process to minimize risk of recurrence. |
| Mar-2021 | Surrey | Burn or scald | IBEW | <ul style="list-style-type: none"> Develop Safety Communication related to crew responsibilities and dealing with Traffic Control. Conduct a Learning Team on Hot Crimping. Assign an OHS resource to the Standards Committee to provide safety related input into standards and procedures development related to high-risk work. Investigate industry best practice for hot crimping. Review procedures and standards and include/highlight critical tasks and controls related to hot crimping and the mobile service unit (MSU) to enhance employee awareness. |
| Mar-2021 | Langley | Motor Vehicle Accident | IBEW | <ul style="list-style-type: none"> N/A. Other vehicle hit FEI vehicle. FEI not at fault. |
| Mar-2021 | Vancouver | Sprain, Strain or Tear | IBEW | <ul style="list-style-type: none"> Research the potential to store ladders in confined space ladder trailer. Review the event during the next scheduled safety meeting focusing on the importance of stretching each day and awkward body positions. |
| Mar-2021 | 100 Mile House | Sprain, Strain or Tear | IBEW | <ul style="list-style-type: none"> Educate worker group surrounding wrenching technique, specifically surrounding back up wrenching. |
| Mar-2021 | Burnaby | No Physical Injury | IBEW | <ul style="list-style-type: none"> Develop a process for managing exemptions and escalations for all pandemic concerns. Gather a list of OFAA's and develop a process for communicating all concerns to OFAA's. |
| Apr-2021 | Chase | Sprain, Strain or Tear | IBEW | <ul style="list-style-type: none"> Review the event during the next scheduled safety meeting highlighting the need for caution when approaching traffic control zones. |
| Apr-2021 | Williams Lake | Sprain, Strain or Tear | IBEW | <ul style="list-style-type: none"> Complete ergonomic risk assessment for employee. Ensure modified work is provided for employees as soon as notification has been made about any injury or discomfort while performing work. Provide employees with a list of tasks to be performed that will not further aggravate the injury with guidance from WorkSafeBC documentation. Presentation on Employee Injuries to be delivered at upcoming safety meetings. Manager to ensure CST is provided with a tool extender. |
| Mar-2021 | Kamloops | Sprain, Strain or Tear | IBEW | <ul style="list-style-type: none"> Review the event during the next scheduled safety meeting highlighting the need for ergonomic positioning and move safe prior to starting work. |

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| Month / Year | Work Location | General Nature of Injury | Status | Measures Taken to Avoid Recurrence |
|--------------|---------------|---------------------------------|--------|--|
| Apr-2021 | Kelowna | Puncture | IBEW | <ul style="list-style-type: none"> Research (with Inspectors) options for protecting employees from dog attacks and bites. |
| May-2021 | Victoria | Sprain, Strain or Tear | IBEW | <ul style="list-style-type: none"> Review the event during the next scheduled safety meeting highlighting the need for move safe prior to starting work and to consider removing unnecessary tools from box or alternative methods for transporting tools to area of work. |
| May-2021 | Vancouver | Other | IBEW | <ul style="list-style-type: none"> Re-assess PPE requirements, particularly eye/face protection when conducting hot work in an excavation. |
| May-2021 | Cranbrook | Fracture of a bone or cartilage | IBEW | <ul style="list-style-type: none"> Review appropriate footwear PPE for conditions. Review the event during the next scheduled safety meeting highlighting the need for caution when walking on uneven surfaces with consideration given to snow, ice, rain, debris, loose ground, inclines/declines, congested areas, sink holes, etc. |
| Jun-2021 | Langford | Sprain, Strain or Tear | IBEW | <ul style="list-style-type: none"> Review the meter set configuration to incorporate ergonomic consideration in future designs. Review the event during the next scheduled safety meeting highlighting the need for move safe and ergonomic positioning especially with strenuous activities. Work order created to move the meter location to create a more ergonomic working environment. |
| Jun-2021 | Surrey | Cut, Puncture, Scrape | IBEW | <ul style="list-style-type: none"> Conduct market research to find appropriate band cutters. Review the event during the next scheduled safety meeting highlighting the need for appropriate band cutters for this task to reduce the risk. |
| Jun-2021 | Trail | Sprain, Strain or Tear | IBEW | <ul style="list-style-type: none"> Develop a tracking sheet for MoveSafe that confirms achievement of set goal and focus the stretching on core exercises and back related warm ups. Review the event during the next scheduled safety meeting highlighting the need for caution when entering/exiting a truck box including three points of contact and secured footing. |

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3.3 Telephone Service Factor (Non-Emergency)

Reference: Application Table 13-10 and p. 158-159:

In January and the early part of February 2021, the contact centres experienced a challenging mix of call volumes and high average handle time that resulted in non-emergency telephone service factors for each month being below threshold levels. Opportunities to enhance operational activities and processes were identified and performance returned to above threshold levels in March, with performance at or above threshold levels being sustained since that time. Due to the large volume experienced in the first quarter of the year compared to the rest of the year, the year-to-date performance

1 as at June remains below threshold; however, FEI expects that the annual performance
 2 threshold will be met should the current performance levels continue as expected.

3 3.3.1 Please provide a monthly breakdown of the Telephone Service Factor (Non-
 4 Emergency) from September 2020 through the most recent month for which this
 5 data is available.
 6

7 **Response:**

8 Please refer to the table below for the Telephone Service Factor (TSF) for Non- Emergency
 9 queues from September 2020 to August 2021.

| Year | Month | Queue | Monthly Service Level |
|------|-----------|---------------|-----------------------|
| 2020 | September | Non-Emergency | 46.46% |
| 2020 | October | Non-Emergency | 38.00% |
| 2020 | November | Non-Emergency | 70.55% |
| 2020 | December | Non-Emergency | 78.53% |
| 2021 | January | Non-Emergency | 34.30% |
| 2021 | February | Non-Emergency | 58.62% |
| 2021 | March | Non-Emergency | 78.89% |
| 2021 | April | Non-Emergency | 68.20% |
| 2021 | May | Non-Emergency | 70.68% |
| 2021 | June | Non-Emergency | 80.27% |
| 2021 | July | Non-Emergency | 76.21% |
| 2021 | August | Non-Emergency | 82.83% |

10 The TSF (Non-Emergency) will fluctuate each month dependent on several variables that may
 11 affect call volumes, durations and types. These variables include but are not limited to weather-
 12 related impacts on bills, rates changes, and launches of new customer programs. Generally,
 13 service level challenges in a particular month tend to be offset by variations in other months,
 14 resulting in annual performance that has met benchmark expectations.

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 18 3.3.2 Please explain the “challenging mix of call volumes and high average handle time”,
 19 and in particular why this mix arose in January and early February of 2021, as
 20 compared with the preceding months.
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1 **Response:**

2 Please refer to the response to BCUC IR1 23.4.

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6 3.3.3 Please describe the “opportunities to enhance operational activities and
7 processes” and how they were implemented.

8

9 **Response:**

10 Please refer to the response to BCUC IR1 23.2.

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14 3.3.4 Please quantify the impact of this situation on overtime hours worked and paid to
15 the contact centre workforce.

16

17 **Response:**

18 Over the course of January and February 2021, overtime hours worked by the contact centre
19 workforce were 1,236 and 1,128, respectively, and equated to approximately \$53 thousand and
20 \$48 thousand paid to employees for January and February, respectively. While overtime hours
21 fluctuate month to month, this represents an increase of approximately 60 and 50 percent,
22 respectively, as compared to an average month.

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26 **Reference: FortisBC Inc. 2020 Annual Review Exhibit B-2 page 1:**

27 Approximately \$0.9 million of the total O&M savings were primarily due to labour savings,
28 reflecting the impact of variances in customer contact needs as well as vacancies due to
29 employee movement.

30 3.3.5 Please confirm that FEI and FBI share a single customer contact centre.

31

32 **Response:**

33 FEI interprets the question to be referring to FEI and FBC (and not the FBI).

34 This is not confirmed. While there is a single Customer Service department, there are three
35 customer contact centre locations based out of Burnaby, Prince George and Trail, and one



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1 Customer Service function conducted out of Kelowna. Contact centre support for gas (FEI) and
2 electric (FBC) customers remains separate such that each base of customers has a unique
3 contact number as well as underlying customer information system.

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7 3.3.6 Please explain the circumstances causing call volumes to rise in relation to gas
8 utility customers and to decline in relation to electric utility customers during a
9 similar timeframe.

10

11 **Response:**

12 While gas and electric customers are similar in several ways, there are many factors that may
13 influence different call volume patterns and call types from gas and electric customers in the same
14 time frame. These include, but are not limited to, geographic factors in each service territory such
15 as weather and storms, rate changes, customer programs and self-service capabilities.

16