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September 30, 2021

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

Attention: Mr. Patrick Wruck, Commission Secretary

Dear Mr. Wruck:

**Re: British Columbia Utilities Commission (BCUC) Generic Cost of Capital (GCOC) Proceeding**  
**FortisBC (compromised of FortisBC Energy Inc. (FEI) and FortisBC Inc. (FBC)) Request for Amendment to the Regulatory Timetable**

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FortisBC writes to request an amendment to the regulatory timetable established by the BCUC in Order G-281-21 for the GCOC proceeding. Specifically, the BCUC directed that FEI and FBC each submit evidence in support of their respective cost of capital by November 17, 2021 as part of Stage 1 of this proceeding. This deadline will be extremely challenging for FortisBC to meet, and it will prejudice FortisBC's ability to put forward its best case on a matter of great importance to the companies. FortisBC respectfully submits that an extension of this evidence deadline to January 31, 2022 is necessary to ensure a fair and efficient process.

Although the BCUC has re-affirmed the use of a Benchmark Utility, the current process departs from past practice in the sense that FBC's cost of capital is being addressed in Stage 1. This change is significant from the perspective of evidence preparation because FortisBC's work to date has focused on preparing evidence for FEI, and not FBC. Similarly, while FortisBC had already engaged an expert to provide a report, the expert's work has to date been focused on FEI (and even that work is still underway and would prove challenging to finalize by the November 17, 2021 deadline). While there are some areas where the expert evidence already underway could apply to both utilities, there are significant areas where it will certainly differ.

The new process not only accelerates the timeline for producing evidence for FBC, but also changes the way in which that evidence must be framed; FBC's previous evidence for Stage 2 had always been framed in terms of identifying risk relative to FEI. Developing new evidence for FBC "from the ground-up" will require additional work and time.

In effect, the timeline leaves FortisBC only seven weeks to prepare an entire cost of capital application for FBC “from the ground up”, which is unprecedented. Even with the requested extension, FBC will still have *significantly* less time to prepare evidence than any other utility participating in this process or past processes.

The current timeline also poses challenges for FEI; the filing date leaves only two weeks for FortisBC’s expert to reflect on, and if necessary address, Dr. Lesser’s responses to information requests, while at the same time trying to complete the expert evidence for both companies.

Maintaining the current timeline would, in short, undermine the fairness of the proceeding. The requested amendment to the regulatory timetable will allow FortisBC and its expert adequate time to consider and prepare quality evidence for both utilities, which will result in the most fair, efficient and cost-effective regulatory review process for all participants. Given that one, or potentially both, of the FortisBC utilities will serve as a Benchmark Utility, all other participating utilities in this process are also potentially prejudiced by FortisBC having insufficient time to prepare evidence.

Although FortisBC would have required the extension regardless, FortisBC also notes that the quality of the evidence will be enhanced by allowing the considerable body of work that is being developed in support of FEI’s Renewable Gas Comprehensive Review and Long-term Gas Resource Plan to be further progressed before the GCOC evidence is filed. The same resources that are leading the two referenced proceedings and FBC’s Long-term Electric Resource Plan are key contributors to the GCOC evidence.

For the foregoing reasons, FortisBC respectfully requests that the BCUC extend the deadline for the filing of FortisBC’s evidence to Monday, January 31, 2022 (which, in effect, represents an additional two months when considering holiday time in late December). The remainder of the timetable set out in Order G-281-21 would then be extended by an equivalent amount of time.

If further information is required, please contact the undersigned.

Sincerely,

**on behalf of FORTISBC**

***Original signed:***

Diane Roy

cc (email only): Registered Parties