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November 10, 2021

Tsleil-Waututh Nation
c/o Miller Titerle Law Corporation
300-638 Smithe Street
Vancouver, BC V6B 1E3

Attention: Joelle Walker

Dear Ms. Walker:

Re: FortisBC Energy Inc. (FEI)

Application for a Certificate of Public Convenience and Necessity (CPCN) for the Tilbury Liquefied Natural Gas (LNG) Storage Expansion (TLSE) Project (Application)

Response to the Citizens for Tsleil-Waututh Nation (TWN) Information Request (IR) No. 2

On December 29, 2021, FEI filed the Application referenced above. In accordance with the regulatory timetable established in British Columbia Utilities Commission Order G-185-21 for the review of the Application, FEI respectfully submits the attached response to TWN IR No. 2.

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 the Tilbury Liquefied Natural Gas (LNG) Storage Expansion (TLSE) Project (Application)	Submission Date: November 10, 2021
Response to Tseil-Waututh Nation (TWN) Information Request (IR) No. 2	Page 1

1 **A. PROJECT NEED**

2 **1. REFERENCE: PROJECT ALTERNATIVES**

3 **Exhibit B-25, pp. 1, 2 (PDF pp. 2, 3)**

4 **Exhibit B-1, pp. 3 (PDF pp. 230)**

5 **Preamble:** At pp.1 of FEI’s Response to TWN’s IR No. 1, Question 1.1, FEI confirms
6 that FEI’s definition of ‘resiliency’ used throughout the Applications focuses on FEI’s
7 natural gas system and the risks related to a potential no-flow event on the T-South
8 system.

9 1.1 Did FEI consult or engage with Tseil-Waututh Nation (“**TWN**”) on this definition of
10 ‘resiliency’ or solicit TWN’s views on what the definition of ‘resiliency’ should
11 include?
12

13 **Response:**

14 Resiliency is a term commonly used in the energy industry. FEI did not consult or engage with
15 TWN on the definition of resiliency as it relates to FEI’s gas system. However, the concept of
16 resiliency in relation to FEI’s gas system was introduced within the Initial Project Description which
17 was shared with TWN through the Early Engagement Phase of the parallel provincial EA process.

18
19

20
21 1.2 Despite Fortis’ definition of ‘resiliency’, please explain whether the TSLE Project
22 contributes to the overall climate change resiliency of the British Columbia energy
23 grid, including the need to transition away from consumption of fossil fuels as set
24 out in the CleanBC Plan and the Clean Energy Act, SBC 2010, c 22, s. 2(c).
25
26

27 **Response:**

28 Please refer to the responses to BCUC IR1 63.1, BCSEA IR2 11.1 and TWN IR1 13.1 and 14.2.

29

FortisBC Energy Inc. (FEI or the Company) Application for a Certificate of Public Convenience and Necessity (CPCN) for the Tilbury Liquefied Natural Gas (LNG) Storage Expansion (TLSE) Project (Application)	Submission Date: November 10, 2021
Response to Tseil-Waututh Nation (TWN) Information Request (IR) No. 2	Page 2

1 **B. PROJECT ALTERNATIVES**

2 **2. REFERENCE: PROJECT ALTERNATIVES**

3 **Exhibit B-1, pp. 77 (PDF pp. 93)**

4 **Preamble:** At pp. 77 of the Appendix A of the Redacted Application for a Certificate of
5 Public Convenience and Necessity (“**CPCN**”) for the TLSE Project 5 (the “**Application**”),
6 FEI provides a summary of the two-step evaluation process used to analyze project
7 alternatives.

8 2.1 Did FEI consider impacts to TWN’s Aboriginal rights and title in the evaluation
9 process to analyze project alternatives? If so, please explain how impacts to
10 TWN’s Aboriginal rights and title were weighed in the evaluation process.

11
12 **Response:**

13 The first step in the screening of alternatives did not involve engagement with Indigenous groups
14 as it sought to identify and address the technical needs of the TLSE Project to ensure the Project
15 objective can be achieved. In this case, the early screening of alternatives, driven by technical
16 requirements, identified only one option: new regasification and storage at the Tilbury site
17 between 2 and 3 Bcf. FEI considers this approach to the assessment of feasible alternatives to
18 be appropriate and necessary before proceeding to the next phase of project development that
19 involves engagement with Indigenous groups. FEI will continue to engage with Indigenous groups
20 through the ongoing EA process.

21



FortisBC Energy Inc. (FEI or the Company) Application for a Certificate of Public Convenience and Necessity (CPCN) for the Tilbury Liquefied Natural Gas (LNG) Storage Expansion (TLSE) Project (Application)	Submission Date: November 10, 2021
Response to Tseil-Waututh Nation (TWN) Information Request (IR) No. 2	Page 3

1 **3. REFERENCE: PROJECT ALTERNATIVES**

2 **Exhibit B-1, pp. 115 (PDF pp. 131)**

3 **Preamble:** At pp. 115 of the Application, FEI identifies Criterion 5 - Ancillary Benefits
4 related to the proposed 3 Bcf option, including the potential to reduce customer rates
5 resulting from the load growth associated with the 3 Bcf tank versus a 2 Bcf tank. FEI also
6 identifies opportunities associated with the construction of a new pipeline that will proceed
7 when supported by load growth.

8 3.1 Please describe how such ancillary benefits were weighed against other criterion
9 in determining the superior project alternative.

10

11 **Response:**

12 As discussed in the TLSE Application, the only feasible approach to meet the Minimum Resiliency
13 Planning Objective (MRPO) was through a new on-system LNG storage tank sized between 2
14 and 3 Bcf. With a smaller 2 Bcf tank, it would not be possible to reserve 2 Bcf exclusively for
15 resiliency without foregoing, for instance, the gas supply and operational function that the current
16 Base Plant has served since 1971, and which remains important to serving customers. FEI would
17 need to contract 150 MMcf/day of supply as part of the existing gas supply resource stack to
18 replace it, as discussed in the response to BCUC IR1 22.7. As discussed in the response to
19 BCUC IR1 46.2, FEI estimated the cost for procuring supply in the market for peak demand
20 purposes would be approximately \$30 million per year. By taking this into account, FEI reviewed
21 the two tank size alternatives and concluded that the 3 Bcf tank would be the most appropriate
22 given its additional resiliency and ancillary benefits. These benefits were further explained in the
23 response to BCUC IR1 46.2, which confirms that the gas supply benefits associated with the “third
24 Bcf” alone outweigh the incremental costs of a larger tank, and ultimately, make the 3 Bcf tank
25 more cost effective for FEI’s customers.

26

FortisBC Energy Inc. (FEI or the Company) Application for a Certificate of Public Convenience and Necessity (CPCN) for the Tilbury Liquefied Natural Gas (LNG) Storage Expansion (TLSE) Project (Application)	Submission Date: November 10, 2021
Response to Tsleil-Waututh Nation (TWN) Information Request (IR) No. 2	Page 4

1 **C. PROJECT DESCRIPTION**

2 **4. REFERENCE: PROJECT DESCRIPTION**

3 **Exhibit B-1, pp. 127 (PDF pp.143)**

4 **Preamble:** At pp. 127 of the Application, FEI states that the new storage tank proposed
5 as part of the 3 Bcf storage tank option will require venting at certain times, but that the
6 Project will be designed to prevent venting occurrences. FEI concludes that venting to the
7 atmosphere is expected to be an unlikely event. However, FEI has not discussed in the
8 Application any measures that will be taken to mitigate against fugitive emissions not
9 associated with venting, such as fugitive emissions associated with leakages.

10 4.1 What measures, if any, will FEI employ to mitigate against fugitive emissions from
11 the 3 Bcf storage tank and associated infrastructure?
12

13 **Response:**

14 FEI will institute a fugitive emissions management system across the facility to meet provincial
15 and federal regulations, and in order to minimize potential future costs related to methane
16 releases. The monitoring program will consist of comprehensive leak detection surveys carried
17 out three times a year. In parallel, FEI is also surveying the market for commercially available
18 technologies to measure and manage fugitive emissions at the Tilbury site. For example, FEI has
19 made a number of design decisions that will address fugitive emissions, including the
20 electrification of equipment to minimize the requirement for natural gas driven equipment. FEI will
21 also take steps during the detailed engineering phase to proactively manage the number of
22 potential fugitive emission sources, including minimizing the number of pipeline flanges – which
23 could become potential hydrocarbon leak points.

24
25

26
27 4.2 In weighing the project alternatives, did FEI consider comparative potential fugitive
28 emissions associated with each project alternative?
29

30 **Response:**

31 FEI assessed the Project alternatives based on their ability to meet the Minimum Resiliency
32 Planning Objective. On this basis, the 3 Bcf storage tank was determined to be the preferred
33 alternative to meet the Project objective. FEI does not expect that the fugitive emissions would
34 vary significantly between the feasible alternatives that were assessed.

35



FortisBC Energy Inc. (FEI or the Company) Application for a Certificate of Public Convenience and Necessity (CPCN) for the Tilbury Liquefied Natural Gas (LNG) Storage Expansion (TLSE) Project (Application)	Submission Date: November 10, 2021
Response to Tseil-Waututh Nation (TWN) Information Request (IR) No. 2	Page 5

1 **5. REFERENCE: PROJECT DESCRIPTION**

2 **Exhibit B-25, pp. 4-6 (PDF pp. 5-7)**

3 **Preamble:** At pp. 6 of FEI’s Response to TWN’s IR No. 1, Question 4.1, FEI states
4 that the TLSE Project is being constructed for resiliency purposes, as described in Section
5 3 of the Application. FEI states that the TLSE Project will not increase the capacity of the
6 Tilbury Marine Jetty (“**TMJ**”) and that the TMJ will connect to a Tilbury 1 A storage tank.

7 At pp. 4 and 5 FEI’s Response to TWN’s IR No. 1, Question 3.1, FEI states that
8 approximately 8 percent of LNG sales from Tilbury were for the export market between
9 January 1, 2017 and June 30, 2021.

10 5.1 If FEI stopped exporting LNG from other aspects of the Tilbury facility, including
11 from Phase 1A and 1B facilities, and instead dedicated the amount of LNG
12 previously sold for export to domestic use, would this increase the resiliency to
13 meet the Minimum Resiliency Planning Objective?
14

15 **Response:**

16 The Minimum Resiliency Planning Objective is related to having adequate regasification capacity
17 and storage, not liquefaction capacity. The current facilities at the Tilbury site, regardless of how
18 much gas is liquefied or how much LNG is retained in storage, cannot regasify fast enough to
19 maintain operating pressure and support the Lower Mainland demand. As discussed in the
20 response to BCUC IR2 78.1, during a normal winter the load exceeds available supply by such a
21 significant margin that FEI would be forced to shut down large portions of the Lower Mainland in
22 the first day of a no-flow event.

23 Once that regasification constraint is rectified, which requires a new facility to replace the existing
24 Base Plant, there needs to be enough LNG storage in the Lower Mainland to outlast the
25 disruption. There is not enough storage at the Tilbury site to store sufficient supply to consistently
26 last three days during the winter heating season. Limiting export would not impact available
27 storage, which is determined by the size of the tank.

28
29

30 5.2 If not sufficient alone to meet the Minimum Resiliency Planning Objective, would
31 stopping the export of LNG from the Tilbury facility and directing those amounts of
32 LNG to domestic use change the analysis of any of the project alternatives
33 considered by FEI?
34

35

36 **Response:**

37 Ceasing export sales would not meet the Minimum Resiliency Planning Objective and would not
38 change the analysis of Project alternatives. Even if the entire volume of the Tilbury T1A tank was



FortisBC Energy Inc. (FEI or the Company) Application for a Certificate of Public Convenience and Necessity (CPCN) for the Tilbury Liquefied Natural Gas (LNG) Storage Expansion (TLSE) Project (Application)	Submission Date: November 10, 2021
Response to Tseil-Waututh Nation (TWN) Information Request (IR) No. 2	Page 6

1 available and regasification capacity was not a constraint, FEI would still likely have insufficient
2 volume to withstand a three-day no-flow event during winter conditions.

3 Regardless of how much volume is present in the T1A and Base Plant tanks, FEI's current
4 regasification capacity is 150 MMcf/day which constrains the extent to which FEI can inject gas
5 back in to the system and is well short of meeting peak demand in the Lower Mainland such that
6 the system would experience widespread outages on the first day of a no-flow event occurring
7 during a normal winter.

8 Please also refer to the response to BCUC IR2 78.1 for supporting analysis.

9

FortisBC Energy Inc. (FEI or the Company) Application for a Certificate of Public Convenience and Necessity (CPCN) for the Tilbury Liquefied Natural Gas (LNG) Storage Expansion (TLSE) Project (Application)	Submission Date: November 10, 2021
Response to Tseil-Waututh Nation (TWN) Information Request (IR) No. 2	Page 7

1 **6. REFERENCE: PROJECT DESCRIPTION**

2 **Exhibit B-25, pp. 5 (PDF pp. 6)**

3 **Exhibit B-1, Appendix Q-1, pp. 2-1 (PDF pp. 614)**

4 **Preamble:** At pp. 5 of FEI’s Response to TWN’s IR No. 1, 3.3, FEI states that:

5 The TLSE Project involves the construction of a 3 Bcf storage tank, and does not
6 include liquefaction. FEI has reserved 5 MMcf/day of liquefaction capacity from the
7 existing Tilbury 1A liquefaction train in order to refill the tank following resiliency
8 events or when storage volumes are used for domestic gas supply purposes.

9 The Initial Project Description at pp. 2-1 of the Appendix Q-1 of the Application
10 contemplates the construction of liquefaction trains to meet market demand. At pp. 115 of
11 the Application, FEI also describes the increase of liquefaction capacity up to 3 million
12 tonnes per annum as part of the expansion of the Tilbury LNG site as part of the ancillary
13 benefits of a 3 Bcf tank but describes this as an “uncertain and contingent event.”

14 FEI’s detailed project description,¹ which forms part of FEI’s application for an
15 Environmental Assessment Certificate for the Project under the Environmental
16 Assessment Act, describes Tilbury Phase 2 as including expansion of natural gas
17 processing and liquefaction capacity up to a total installed capacity of 7,700t/d.

18 6.1 Please provide clarification on whether the expansion of liquefaction capacity
19 referenced in the Application is the same as that referenced in FEI’s detailed
20 project description under the Environmental Assessment Act.

21
22 **Response:**

23 The liquefaction expansion referenced in the Application is the same liquefaction referenced in
24 the Detailed Project Description. The liquefaction volumes differ because the proposed design
25 capacity has been reduced to 7,700 tonnes per day. This is described in a letter from FEI to the
26 BC Environmental Assessment Office dated April 26, 2021. Please also refer to the response to
27 BCSEA IR1 3.10 which explains the chronology of milestones in the development of the Tilbury
28 Phase 2 Expansion Project and the TLSE Project, including the timing of when the liquefaction
29 capacity within the EA was revised downward to 7,700 tonnes per day.

30
31
32
33 6.2 If these references are the same, please explain why FEI is seeking approval of
34 the expansion of liquification capacity as a component of its application under the

¹ Fortis BC, “Tilbury Phase 2 LNG Expansion Project, Detailed Project Description – Rev 2 – September 2021”,
online:
https://projects.eao.gov.bc.ca/api/public/document/6138dcca17ba3b0022913ab0/download/FortisBC_Tilbury_DP_D_Package.pdf at pp. i.

FortisBC Energy Inc. (FEI or the Company) Application for a Certificate of Public Convenience and Necessity (CPCN) for the Tilbury Liquefied Natural Gas (LNG) Storage Expansion (TLSE) Project (Application)	Submission Date: November 10, 2021
Response to Tsleil-Waututh Nation (TWN) Information Request (IR) No. 2	Page 8

1 Environmental Assessment Act if this increase of liquefaction capacity would be
2 an “uncertain and contingent event”.

3
4 **Response:**

5 Please refer to the response to BCUC IR2 86.4.

6
7

8
9 6.3 Please describe whether FEI views this expansion of liquefaction capacity as a
10 factor within the scope of the BCUC’s decision regarding this CPCN or if FEI will
11 be seeking an additional CPCN related to the expansion of liquefaction capacity
12 as part of Tilbury Phase 2.

13
14 **Response:**

15 FEI is not seeking BCUC approval of the liquefaction capacity (i.e., the Liquefaction Facility) in
16 this proceeding and does not anticipate an additional CPCN related to the expansion of
17 liquefaction capacity as part of the Tilbury Phase 2 Expansion.

18 Please also refer to the response to BCUC IR1 23.2.

19

FortisBC Energy Inc. (FEI or the Company) Application for a Certificate of Public Convenience and Necessity (CPCN) for the Tilbury Liquefied Natural Gas (LNG) Storage Expansion (TLSE) Project (Application)	Submission Date: November 10, 2021
Response to Tsleil-Waututh Nation (TWN) Information Request (IR) No. 2	Page 9

1 **D. ENVIRONMENT AND ARCHAEOLOGY**

2 **7. REFERENCE: ENVIRONMENT AND ARCHAEOLOGY**

3 **Exhibit B-25, pp. 7-8 (PDF pp. 8-9)**

4 **Preamble:** At pp. 7-8 of FEI's Response to TWN's IR No. 1, Question 5.1, FEI states
5 that it intends to abide by the current requirements of the provincial statutory regime
6 pertaining to archaeology and heritage resource management, stating that:

7 ...management of archaeological and heritage resources will be governed by
8 relevant provincial permitting processes in effect at that time. FEI will engage with
9 the Indigenous groups listed in Table 8-4 of the Application regarding FEI's
10 archaeology work for the Project, including respective heritage permitting
11 processes.

12 Further, in FEI's Response to TWN's IR No. 1, Question 6.2, FEI states that it would "follow
13 provincial regulations regarding the identification and investigation of archaeological
14 materials as the Project site" in consultation with TWN representatives.

15 Currently, there are no requirements under the Heritage Conservation Act with respect to
16 the United Nations Declaration on the Rights of Indigenous Peoples ("**UNDRIP**") and the
17 Province has not yet taken direct action to align the Heritage Conservation Act with
18 UNDRIP pursuant to the requirement under section 3 of the Declaration on the Rights of
19 Indigenous Peoples Act ("**DRIPA**").

20 7.1 In fulfilling its statutory requirements under the Heritage Conservation Act, will FEI
21 directly implement TWN's own heritage management principles and requirements
22 or otherwise directly integrate TWN perspectives on the interconnected cultural
23 values of TWN heritage resources?
24

25 **Response:**

26 FEI acknowledges TWN perspectives on the interconnected cultural values and heritage
27 resources and will integrate these perspectives into the management of any heritage resources
28 identified at the Tilbury site as appropriate.

29
30

31
32 7.2 Can FEI please confirm its understanding of which Provincial ministry will be
33 overseeing the 'relevant provincial permitting processes' and will be issuing
34 permits, such as Site Alteration Permits?
35



FortisBC Energy Inc. (FEI or the Company) Application for a Certificate of Public Convenience and Necessity (CPCN) for the Tilbury Liquefied Natural Gas (LNG) Storage Expansion (TLSE) Project (Application)	Submission Date: November 10, 2021
Response to Tseil-Waututh Nation (TWN) Information Request (IR) No. 2	Page 10

1 **Response:**

2 In 2020, the Archaeology Branch of the Ministry of Forest Lands and Natural Resource Operations
3 and Rural Development issued a Heritage Inspection Permit for the Tilbury site under Section
4 12.2 of the *Heritage Conservation Act*, which was amended in 2021. If additional *Heritage*
5 *Conservation Act* permits are needed, FEI will follow the provincial *Heritage Conservation Act*
6 permitting process, permits would be issued and overseen by the Archaeology Branch of the
7 Ministry of Forest Lands and Natural Resource Operations and Rural Development for Section
8 12.2 (inspection and investigation) permits and by the BC Oil and Gas Commission for Section
9 12.4 (site alteration) permits.

10

FortisBC Energy Inc. (FEI or the Company) Application for a Certificate of Public Convenience and Necessity (CPCN) for the Tilbury Liquefied Natural Gas (LNG) Storage Expansion (TLSE) Project (Application)	Submission Date: November 10, 2021
Response to Tseil-Waututh Nation (TWN) Information Request (IR) No. 2	Page 11

1 **8. REFERENCE: ENVIRONMENT AND ARCHAEOLOGY**

2 **Exhibit B-25, pp. 9 (PDF pp. 10)**

3 **Preamble:** At pp. 9 of FEI’s Response to TWN’s IR No. 1, Question 7.1, regarding the
4 development of an archaeological chance find procedure, FEI states: “TWN will have the
5 opportunity to comment on the site-specific chance find management procedure.”

6 8.1 In providing TWN an opportunity to comment on the site-specific chance find
7 management procedure, does FEI intend to: i) seek the direct input of TWN in
8 developing the procedure; ii) implement TWN’s requirements concerning its
9 preferred heritage management procedures; or iii) otherwise adapt its chance find
10 management procedure in response to input provided by TWN, including TWN’s
11 own Chance Find Procedure Guidelines?

12
13 **Response:**

14 FEI has developed a draft site-specific chance find management procedure which Indigenous
15 groups, including TWN, will have an opportunity to review and provide input regarding. FEI will
16 make best efforts to incorporate the input of all potentially affected Indigenous groups that are
17 included in the draft procedure, and would be pleased to meet with TWN after it has an opportunity
18 to review the draft.

19

1 **E. CONSULTATION**

2 **9. REFERENCE: CONSULTATION**

3 **Exhibit B-25, pp. 12 (PDF pp. 13)**

4 **Preamble:** At pp. 12 of FEI's Response to TWN's IR No. 1, Question 8.1, FEI states
5 that the Statement of Indigenous Principles, which was prepared by Fortis with
6 engagement with Indigenous leaders in 2001, provides the foundation for FEI's
7 engagement approach. FEI also states that it is guided by these Principles and continues
8 to evolve its practices over time.

9 9.1 Has FEI's Statement of Indigenous Principles been updated since its inception to
10 reflect UNDRIP, DRIPA, and modern understandings of Indigenous law and
11 rights?
12

13 **Response:**

14 FEI has not updated its Statement of Indigenous Principles since inception. However, FEI has
15 publicly supported the implementation of UNDRIP and DRIPA.

16
17

18
19 9.2 How has FEI's engagement practices evolved over time since the creation of the
20 Statement of Indigenous Principles?
21

22 **Response:**

23 FEI's engagement practices have evolved over time due to a range of factors, including legislative
24 and policy changes with the passage of the BC provincial *Declaration on the Rights of Indigenous*
25 *Peoples Act* and the federal *UNDRIP Act*. For example, FEI's engagement practices are not one
26 size fits all, reflect the needs and interests of the Indigenous groups involved, and occur at an
27 early stage in the project lifecycle. FEI's engagement practices have also evolved to reflect
28 regulatory requirements such as the BC Environmental Assessment Process, which includes an
29 Early Engagement Phase and provides an opportunity for Indigenous-led assessments.

30 FEI also continues to evolve its engagement practices through the Progressive Aboriginal
31 Relations certification program, which FEI committed to in 2019. This program helps FEI evolve
32 its relations and practices through focus on four key drivers, including leadership actions,
33 employment, business development and community relationships. FEI is currently in the second
34 of three years in the program.

35
36

37

FortisBC Energy Inc. (FEI or the Company) Application for a Certificate of Public Convenience and Necessity (CPCN) for the Tilbury Liquefied Natural Gas (LNG) Storage Expansion (TLSE) Project (Application)	Submission Date: November 10, 2021
Response to Tsleil-Waututh Nation (TWN) Information Request (IR) No. 2	Page 13

1 9.3 Which Nations or groups did Fortis engage with to prepare the Statement of
2 Indigenous Principles?
3

4 **Response:**

5 Without the approval of those engaged, FEI is unable to provide this information and respectfully
6 declines to respond. However, FEI confirms that the Statement of Indigenous Principles was
7 developed with input from Indigenous leaders from across Canada, including British Columbia.

8

1 **10. REFERENCE: CONSULTATION**

2 **Exhibit B-25, pp. 14 (PDF pp. 15)**

3 **Preamble:** At pp. 14 of FEI's Response to TWN's IR No. 1, Question 8.4, FEI states
4 that it views that the "engagement activities to date are sufficient for this stage of the
5 Project planning and development, and for the BCUC regulatory review process."

6 10.1 Has FEI discussed with TWN what TWN's views are regarding the adequacy of
7 consultation and engagement to date?

8
9 **Response:**

10 To date, FEI has not discussed with TWN what TWN's views are regarding the adequacy of
11 consultation and engagement as it relates to the TLSE Project, which is subject to this BCUC
12 regulatory review process. However, FEI continues to engage with Indigenous groups that have
13 an asserted interest in the Project area through the provincial EA and federal IA processes. FEI
14 recognizes that consensus seeking with Indigenous groups, including TWN, is a central element
15 of these processes.

16
17

18
19 10.2 What specific measures has FEI taken to seek the free, prior and informed consent
20 ("FPIC") of TWN with regard to the BCUC regulatory review process and the
21 BCUC's forthcoming decision regarding the CPCN?

22
23 **Response:**

24 It is FEI's intention to engage in discussions with TWN with the aim of obtaining their free, prior
25 and informed consent, although consent from TWN is not a requirement of the BCUC's CPCN
26 Guidelines. Rather, the BCUC will assess the adequacy of consultation to date, given the nature
27 of the approval sought.

28 As described in Section 8 of the Application, FEI and FortisBC Holdings Inc. have undertaken
29 synchronized consultative activities through parallel provincial EA and federal IA processes, which
30 involve significant engagement activities encompassing the TLSE Project. Up to filing of the
31 Application, engagement activities with TWN have included:

- 32 • Early engagement prior to formal submission of project materials to the BC EAO;
- 33 • Meetings between FEI, FortisBC Holdings Inc. and TWN to share information and hear
34 comments and concerns;
- 35 • Timeline extensions in response to the needs of TWN and its community members;
- 36 • Offering capacity funding to support TWN's engagement activities; and



FortisBC Energy Inc. (FEI or the Company) Application for a Certificate of Public Convenience and Necessity (CPCN) for the Tilbury Liquefied Natural Gas (LNG) Storage Expansion (TLSE) Project (Application)	Submission Date: November 10, 2021
Response to Tsleil-Waututh Nation (TWN) Information Request (IR) No. 2	Page 15

- 1
 - 2
 - 3
- Notifying TWN of the TLSE CPCN Application filing with the BCUC and provision of information on how to participate in the associated proceeding.

FortisBC Energy Inc. (FEI or the Company) Application for a Certificate of Public Convenience and Necessity (CPCN) for the Tilbury Liquefied Natural Gas (LNG) Storage Expansion (TLSE) Project (Application)	Submission Date: November 10, 2021
Response to Tsleil-Waututh Nation (TWN) Information Request (IR) No. 2	Page 17

1 **12. REFERENCE: CONSULTATION**
2 **Exhibit B-25, pp. 15 (PDF pp. 16)**
3 **Exhibit B-1, pp. 196 (PDF pp. 212)**

4 **Preamble:** At pp. 15 of FEI’s Response to TWN’s IR No. 1, Question 9.1, and
5 throughout Section 8 of the Application, beginning at pp. 196, FEI describes its
6 engagement to date with Indigenous groups related to the TSLE Project, including sending
7 introductory emails, having introductory meetings, etc.

8 12.1 Has FEI consulted with TWN regarding the various project alternatives discussed
9 in the Application? If so, please explain what consultation regarding the project
10 alternatives has occurred.

11
12 **Response:**

13 FEI confirms that engagement with Indigenous groups, including TWN, regarding the TLSE
14 Project is ongoing through the provincial EA and federal IA processes. An evaluation of project
15 alternatives is also included in Section 2.7 (Alternatives to the Project) of the Detailed Project
16 Description for the Tilbury Phase 2 LNG Expansion Project, of which the TLSE Project is a
17 component. The Detailed Project Description was accepted by the BC EAO on September 7,
18 2021.

19

FortisBC Energy Inc. (FEI or the Company) Application for a Certificate of Public Convenience and Necessity (CPCN) for the Tilbury Liquefied Natural Gas (LNG) Storage Expansion (TLSE) Project (Application)	Submission Date: November 10, 2021
Response to Tsleil-Waututh Nation (TWN) Information Request (IR) No. 2	Page 18

1 **13. REFERENCE: CONSULTATION**

2 **Exhibit B-1, pp. 196, 197, 205 (PDF pp. 212, 213, 221)**

3 **Preamble:** Throughout Section 8 of the Application, beginning at pp. 196, FEI sets out
4 its consultation and engagement activities with potentially impacted Indigenous groups. At
5 pp. 197 of the Application, FEI states that early engagement with Indigenous groups was
6 conducted as part of the Environmental Assessment Act and Impact Assessment Act.
7 Further, FEI states at pp. 205 of the Application that its consultation and engagement
8 activities are intended to “allow for synchronized consultative activities with the parallel
9 Provincial EA and Federal IA processes”.

10 13.1 Has the Crown directed FEI to undertake delegated consultation and engagement
11 activities with respect to the BCUC’s forthcoming decision regarding the CPCN? If
12 so, which Crown entity?

13
14 **Response:**

15 FEI has not been delegated consultation and engagement activities from a Crown entity; however,
16 it has undertaken the activities required under the BCUC CPCN Guidelines.² Consultation
17 regarding the Tilbury Phase 2 LNG Expansion Project, of which the TLSE Project is a component,
18 is being undertaken as part of parallel environmental assessment processes.

19 For clarity, the role of the BCUC in CPCN proceedings with respect to consultation is to assess
20 the adequacy of FEI’s consultation to date, given the nature of the approval sought.

21
22

23
24 13.2 Has FEI undertaken consultation and engagement activities with TWN specifically
25 related to the BCUC’s forthcoming decision regarding the CPCN, including with
26 regard to the evaluation of project alternatives?

27
28 **Response:**

29 In June 2020 and February 2021, FEI discussed TWN’s participation as an intervener as part of
30 the BCUC process in order to understand TWN’s perspective on the forthcoming CPCN decision.
31 These conversations focused on the BCUC’s processes, the purpose of the Application, and
32 opportunities for TWN to participate.

33 As noted in the response to TWN IR2 12.1, engagement regarding the TLSE Project is ongoing
34 through parallel environmental assessment processes, including with respect to Project
35 alternatives. FEI considers these processes to be comprehensive, involving significant

² https://docs.bcuc.com/documents/Guidelines/2015/DOC_25326_G-20-15_BCUC-2015-CPCN-Guidelines.pdf.



FortisBC Energy Inc. (FEI or the Company) Application for a Certificate of Public Convenience and Necessity (CPCN) for the Tilbury Liquefied Natural Gas (LNG) Storage Expansion (TLSE) Project (Application)	Submission Date: November 10, 2021
Response to Tsleil-Waututh Nation (TWN) Information Request (IR) No. 2	Page 19

- 1 engagement with Indigenous groups, including TWN. As such, FEI considers it appropriate to
- 2 continue engagement related to Project alternatives through these processes.

FortisBC Energy Inc. (FEI or the Company) Application for a Certificate of Public Convenience and Necessity (CPCN) for the Tilbury Liquefied Natural Gas (LNG) Storage Expansion (TLSE) Project (Application)	Submission Date: November 10, 2021
Response to Tsleil-Waututh Nation (TWN) Information Request (IR) No. 2	Page 20

1 **F. ENERGY OBJECTIVES AND POLICY CONSIDERATIONS**

2 **14. REFERENCE: ENERGY OBJECTIVES AND POLICY CONSIDERATIONS**

3 **Exhibit B-25, pp. 21 (PDF pp. 22)**

4 **Preamble:** At pp. 21 of FEI's Response to TWN's IR No. 1, Question 13.1, FEI
5 summarizes how the TLSE Project relates to the energy objectives of the Clean Energy
6 Act, s. 2. In relation to the objective set out in section 2(c), to generate at least 93% of the
7 electricity in British Columbia from clean or renewable resources and to build the
8 infrastructure necessary to transmit that electricity, FEI states the following:

9 Not directly relevant; however, the TLSE Project does not impede or conflict with electricity
10 generation from clean and renewable sources.

11 14.1 Please clarify how the development of the TLSE Project will not impede or conflict
12 with the need to for electricity generation from clean and renewable sources in BC.

13

14 **Response:**

15 The TLSE Project will not prevent or impede the selection, design, siting, development or
16 operation of any clean or renewable electricity generation projects in BC which may be needed
17 to meet BC Hydro's, FortisBC's or any other BC electric utility's current or future energy needs.
18 Further, FEI does not anticipate the TLSE Project to impede or conflict with any new transmission
19 projects that might be needed to move electricity from its generation point to its point of use.

20

FortisBC Energy Inc. (FEI or the Company) Application for a Certificate of Public Convenience and Necessity (CPCN) for the Tilbury Liquefied Natural Gas (LNG) Storage Expansion (TLSE) Project (Application)	Submission Date: November 10, 2021
Response to Tseil-Waututh Nation (TWN) Information Request (IR) No. 2	Page 21

1 **15. REFERENCE: ENERGY OBJECTIVES AND POLICY CONSIDERATIONS**
 2 **Exhibit C-7-2, pp. 11 (PDF pp. 12)**
 3 **Exhibit B-25, pp. 26 (PDF pp. 27)**
 4 **Exhibit B-1, pp. 206-207 (PDF pp. 222-223)**

5 **Preamble:** At pp. 11 of TWN’s IR No.1, Question 15.4, TWN asked FEI to “provide an
 6 estimate of the overall investment, in dollars, in Indigenous peoples that the Project will
 7 provide through these opportunities.”

8 At pp. 26 of FEI’s Response to TWN’s IR No. 1, Question 15.4, FEI refers to the response
 9 to TWN IR 1 15.1, but does not provide an estimate of overall investment.

10 15.1 Please confirm whether FEI does or does not have an estimate of the overall
 11 investment, in dollars, in Indigenous peoples that the Project will provide through
 12 the employment and community investment activities that FEI describes at pp. 206
 13 of the Application.

14
 15 **Response:**

16 At this stage of the Project’s development, FEI does not have an estimate of the overall investment
 17 in Indigenous peoples that will be provided by the Project. FEI has not yet completed a socio-
 18 economic assessment as part of the environmental assessment process.

19