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December 23, 2021

Residential Consumer Intervener Association
c/o Midgard Consulting Inc.
Suite 828 – 1130 W Pender Street
Vancouver, B.C.
V6E 4A4

Attention: Mr. Peter Helland, Director

Dear Mr. Helland:

**Re: FortisBC Energy Inc. (FEI)**

**Project No. 1599246**

**Application for Common Rates and 2022 Revenue Requirements for the Fort Nelson Service Area (Application)**

**Response to the Residential Consumer Intervener Association (RCIA) Information Request (IR) No. 1 on Common Rates**

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On August 12, 2021, FEI filed the Application referenced above. In accordance with regulatory timetable established in British Columbia Utilities Commission Order G-315-21 for the review of the Application, FEI respectfully submits the attached response to RCIA IR No. 1 on Common Rates.

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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## A. HISTORY AND THE EVOLUTION OF COMMON RATES

**1. Reference: Exhibit B-1, Application, pp. 11-12**

**Development of Common Rates in Most Service Areas**

At page 11 of the Application, FEI states: "In 1993, FEI undertook a delivery rate design application where it proposed postage stamp delivery charges for the Lower Mainland, Inland and Columbia regions."

At page 12 of the Application, FEI states: "Based on the Order in Councils (OICs) issued by the Lieutenant Governor in Council (LGIC) to the BCUC on November 2, 2006, TGI requested and received BCUC approval for the area formerly served by TGS to be treated as part of the TGI Lower Mainland Service area and to be subject to the TGI Tariff."

At page 12 of the Application, FEI states: "On April 11, 2012, FEI and its affiliates filed an application with the BCUC to amalgamate FEVI, FEW and FEI into a single entity and implement postage stamp rates across the amalgamated entity (including Fort Nelson)."

1.1 In the past amalgamations and implementations of common rates, explain whether there was a smaller territory (i.e. fewer customers) amalgamating with a larger territory and whether the smaller territory had higher rates, such that upon implementation of postage stamp rates the customers in the smaller territory experienced a rate decrease while the rate increase for the larger territory was attenuated due to its larger size.

**Response:**

This response also addresses RCIA IR1 1.2.

FEI confirms that there are a number of past instances where there has been an amalgamation and/or implementation of common rates whereby a smaller territory amalgamated and/or moved to common rates with a larger territory and the former experienced a rate decrease while the latter experienced a rate increase which was attenuated due to its larger size. The most recent examples of this are the amalgamation of FEVI and FEW with FEI, and the implementation of common gas cost rates for Revelstoke propane customers with FEI customers.

There are also a number of instances where, upon amalgamation and implementation of common rates, the smaller regions experienced an increase to their bill (e.g. the Columbia Region in 1993 and Squamish Gas in 2007, as further described below). Further, in the case of Squamish Gas, the situation was similar to FEI's current proposal for FEFN, as the residential customers in Squamish saw an increase in their bills but commercial customers saw a decrease in their bills.

As shown in Figure 3-1 of the Application, over the past 30 years, for FEI and its predecessor companies, there have been four instances of regulatory amalgamation and subsequent postage stamp/common rates:

1. **The amalgamation and implementation of common rates for BC Gas Inc. (Lower Mainland Region), Inland Natural Gas Co. Ltd. (Inland Region), and Columbia Natural Gas Limited (Columbia Region), which became divisions within BC Gas Inc.** At the time of the amalgamation and implementation of common rates, the Columbia Region was the smallest in terms of customer counts with approximately 15,000 customers, with the Inland Region at about 100,000 customers and the Lower Mainland Region at about 500,000 customers. Before the various offsets to mitigate the impact of common rates, the bills for residential customers in the Lower Mainland and Columbia Regions were increased by 6.42 percent and 9.01 percent, respectively, while the residential customers in the Inland Region were decreased by 0.68 percent[1]. For small commercial customers, the postage stamp rates resulted in an increase that ranged between 5 percent and 41 percent for the Lower Mainland Region, an increase that ranged between 7 percent and 24 percent for the Columbia Region, but a decrease that ranged between 11 percent and 14 percent for the Inland Region[2]. In summary, the Columbia Region, which was the smallest out of the three regions in terms of customer counts, experienced a bill increase due to postage stamp rates.

2. **The amalgamation of Squamish Gas into Terasen Gas Utility Ltd. (now FEI), with Squamish Gas included into the Lower Mainland service area effective January 1, 2007.** Prior to the amalgamation on January 1, 2007, the rates for gas service in Squamish were based on the competitive price of heating oil and the trailing rates of BC Hydro's tariff. Squamish Gas at that time had 3,352 customers compared to FEI with over 800,000 customers. With the amalgamation and common rates, Squamish Gas' residential customers' bills were increased by approximately 10 percent, depending on consumption; however, large commercial customers served under RS 3 saw a slight drop in their bills[3].

3. **The amalgamation of FortisBC Energy Inc. (FEI), FortisBC Energy Vancouver Island Inc. (FEVI) and FortisBC Energy Whistler Inc. (FEW), with common rates implemented on January 1, 2015.** At the time of implementing common rates, FEI had an average of 845,493 customers, FEVI had 103,906 customers, and FEW had 2,680

[1] BC Gas Inc. Application of Rate Design Phase B, Volume 1, April 15, 1993; Tab 6, Page 22, Technical Appendix Residential Class.

[2] Order G-101-93, page 18.

[3] Terasen Gas Inc. (TGI) 2006 Annual Review, 2004-2007 MRP Rate Plan, Section B-6 TGS and TGI Amalgamation, page 2.

customers. In terms of bill impact, both FEVI and FEW experienced bill decreases ranging from 15.5 percent to 63.2 percent, depending on the rate classes, while FEI's customers experienced a bill increase ranging from 1.6 percent to 9.1 percent due to common rates with FEVI and FEW[4].

4. **The implementation of common cost of gas rates for Revelstoke propane customers, which was effective on January 1, 2021.** At the time of implementation of common gas cost rates, Revelstoke had approximately 1,500 customers while FEI had over 1 million customers. The common gas rates resulted in bill reductions for Revelstoke customers in the range of 45 percent to 56 percent, depending on the rate class, while there was virtually no impact to FEI's customers[5].

1.2 In the past amalgamations and implementations of common rates, did residential customers of the smaller service territories experience rate increases?

**Response:**

Please refer to the response to RCIA IR1 1.1.

[4] FEI Common Delivery Rates Methodology Application, July 16, 2014, Table 4-18, page 39.
[5] FEI Revelstoke Propane Portfolio Cost Amalgamation Application, Table 5-1, page 20.

## B. CONTEXT OF COMMON RATES

**2. Reference: Exhibit B-1, Application, p.24**

**Declines in Demand and Impact to FEFN Rates**

At page 24 of the Application, FEI states: "FEFN's demand has been trending downwards over a number of years, and this decline has a negative impact on FEFN customers' delivery rates."

And: "As shown in Figure 4-1, actual demand has been on a declining trend since 2014 from approximately 645 TJs to 518 TJs by 2020. This is equivalent to a decline of approximately 20 percent at an average rate of approximately 21.2 TJs per year. The demand forecast is expected to continue to decline from 2021 to 2023 at an average rate of 20.3 TJs per year."

2.1 What level of demand reduction across all classes (assuming proportional reductions across the rate classes to the historic declines) would be required to result in an increase to FEFN Rate Schedule 1 (residential) rates such that they achieve parity with FEI's Rate Schedule 1 rates?

**Response:**

RCIA has asked a number of IRs requesting various analyses seeking to determine when FEFN's residential (RS 1) rates would achieve parity with FEI's RS 1 rates under different isolated scenarios. While FEI responds to these IRs (i.e., RCIA IR1 2.1, 2.2, 3.2 and 3.3) below, FEI disagrees with the implication that FEI's proposals for common rates were premised on FEI and FEFN residential customers reaching rate parity in a certain timeframe, or at all.

The benefits and Objectives of common rates described in the Application, and as elaborated on in response to BCUC and intervener IRs, do not depend on residential rate parity between FEI and FEFN. Nor would it be beneficial to FEI's or FEFN's customers to wait until such parity is achieved. FEFN's commercial customers (i.e., RS 2 and RS 3) are already paying higher delivery rates than FEI's commercial customers, and this situation has existed since 2014. FEI does not consider it reasonable to continue to delay the immediate savings which would be experienced by FEFN's commercial customers until residential rate parity is achieved. Additionally, as explained in Section 5.2 of the Application, FEFN's residential customers will benefit from improved delivery rate stability as a result of the Proposed Common Rate Option, and FEI and its customers (including current Fort Nelson customers) will benefit from reduced regulatory effort and process and improved fairness across service areas.

Further, FEI does not consider the piecemeal analysis requested in the referenced RCIA IRs to be a reasonable depiction of when FEFN's RS 1 rates might achieve parity with FEI's RS 1 rates because:

- The scenarios consider each item in isolation. As an example, when combining the two most probable scenarios (the decline in demand requested in RCIA IR1 2.2 and the capital additions requested in RCIA1 3.3), FEFN's residential delivery rate would reach FEI's level by 2027.
- There are other factors which would affect FEFN's and FEI's RS 1 delivery rates which have not been considered at all.

However, to be responsive to these IRs, FEI has provided the requested analyses. FEI notes the following assumptions are used:

**FEI:**

- For 2022, the delivery rate and revenue requirement are as approved by Order G-366-21;
- For 2023, the assumed delivery rate increase is 8.07 percent as discussed in Section 5.3.1 of the Application (i.e., Line 6 in the tables below); and
- For 2024 and beyond, the revenue requirement and demand forecast are assumed to remain unchanged from the 2023 level (i.e., Lines 9 and 12 in the tables below).

**FEFN:**

- For 2022, the delivery rate increase is 3.41 percent, as discussed in Section 5.3.1 of the Application (i.e., Line 19 in the tables below);
- For 2023, for Tables 3 and 4 (i.e., Line 19), the delivery rate increase is 9.68 percent, as discussed in Section 5.3.1 of the Application;
- For Tables 1 and 2, for 2023 and beyond, assumed no change to the total revenue requirement components (i.e., Line 22); as such, the impact to the delivery rate is only related to the decrease in demand (i.e., Line 25); and
- For Tables 3 and 4, for 2024 and beyond, except for capital additions, all other revenue requirement components and demand forecasts remained unchanged from the 2023 level.

### Table 1: Response to RCIA IR1 2.1

| Line | Particular | Reference | 2022 | 2023 |
|---|---|---|---|---|
| 1 | **FEI** | | | |
| 2 | Residential Existing Effective Delivery Rate ($/GJ) | 2022: Line 7 / Line 12; 2023: Line 4 | 6.688 | 7.228 |
| 3 | Change in Effective Delivery Rate ($/GJ) | Line 8 / Line 12 | 0.540 | 0.583 |
| 4 | **Residential Effective Delivery Rate ($/GJ)** | Line 2 + Line 3 | **7.228** | **7.812** |
| 5 | | | | |
| 6 | Estimated FEI 2023 Delivery Rate Increase | Section 5.3.1 of Application | | 8.07% |
| 7 | Residential Margin at Existing Rate ($000s) | 2022: G-366-21, Sch 19, Ln 3, Col 3; 2023: Prior Yr Ln 4 x Ln 12 | 545,063 | 589,061 |
| 8 | Residential Deficiency/(Surplus) | 2022: G-366-21, Sch 19, Ln 3, Col 4; 2023: Ln 7 x Ln 6 | 43,998 | 47,537 |
| 9 | Residential Margin at Revised Rate ($000) | Line 7 + Line 8 | 589,061 | 636,598 |
| 10 | | | | |
| 11 | Forecast Residential Customer | 2022: G-366-21, Sch 19, Ln 3, Col 9 | 969,238 | 969,238 |
| 12 | Forecast Residential Volume (TJ) | 2022: G-366-21, Sch 19, Ln 3, Col 10 | 81,494 | 81,494 |
| 13 | | | | |
| 14 | **FEFN** | | | |
| 15 | Residential Existing Effective Delivery Rate ($/GJ) | 2022: Line 20 / Line 25; 2023: Line 17 | 5.192 | 5.370 |
| 16 | Change in Effective Delivery Rate ($/GJ) | Line 21 / Line 25 | 0.177 | 2.444 |
| 17 | **Residential Effective Delivery Rate ($/GJ)** | Line 15 + Line 16 | **5.370** | **7.814** |
| 18 | | | | |
| 19 | Delivery Rate Increase | Line 21 / Line 20 | 3.41% | 45.53% |
| 20 | Residential Margin at Existing Rate ($000s) | 2022: App E-1, Sch 15, Ln 3, Col 3; 2023: Prior Yr, Ln 17 x Ln 25 | 1,214 | 863 |
| 21 | Residential Deficiency/(Surplus) | 2022: App E-1, Sch 15, Ln 3, Col 4; 2023: Ln 22 - Ln 20 | 41 | 393 |
| 22 | Residential Margin at Revised Rate ($000) | 2022: Line 20 + Line 21; 2023: Equal to 2022 | 1,255 | 1,255 |
| 23 | | | | |
| 24 | Forecast Residential Customer | 2022: App E-1, Sch 15, Ln 3, Col 9; 2023: Equal to 2022 | 1,854 | 1,854 |
| 25 | Forecast Residential Volume (TJ) | 2022: App E-1, Sch 15, Ln 3, Col 10; 2023: Ln 30 | 234 | 161 |
| 26 | | | | |
| 27 | **Total Volume Reduction (TJ)** | | | **(147)** |
| 28 | | | | |
| 29 | Volume by Rate Classes | | | |
| 30 | RS 1 | 2022: App E-1, Sch 15, Ln 3, Col 10; 2023: Ln 33 x Prior Yr: Ln 30 / Ln 33 | 234 | 161 |
| 31 | RS 2 | 2022: App E-1, Sch 15, Ln 5, Col 10; 2023: Prior Yr + Ln 25 | 150 | 103 |
| 32 | RS 3 | 2022: App E-1, Sch 15, Ln 6, Col 10; 2023: Prior Yr + Ln 26 | 87 | 60 |
| 33 | Total | 2022: App E-1, Sch 15, Ln 7, Col 10; 2023: Prior Yr + Ln 27 | 471 | 324 |

As Table 1 above shows, the total FEFN demand would need to decline by approximately 147 TJ (or 63 percent) in 2023 before the delivery rate of FEFN's residential (RS 1) customers would be at parity with FEI's residential (RS 1) delivery rate. This scenario is highly improbable.

**Table 2: Response to RCIA IR1 2.2**

| Line | Particular | Reference | 2022 | 2023 | 2024 | 2025 | 2026 | 2027 | 2028 | 2029 | 2030 | 2031 |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 1 | **FEI** | | | | | | | | | | | |
| 2 | Residential Existing Effective Delivery Rate ($/GJ) | 2022: Line 7 / Line 12; 2023 Onward: Line 4 | 6.688 | 7.228 | 7.812 | 7.812 | 7.812 | 7.812 | 7.812 | 7.812 | 7.812 | 7.812 |
| 3 | Change in Effective Delivery Rate ($/GJ) | Line 8 / Line 12 | 0.540 | 0.583 | - | - | - | - | - | - | - | - |
| 4 | **Residential Effective Delivery Rate ($/GJ)** | Line 2 + Line 3 | **7.228** | **7.812** | **7.812** | **7.812** | **7.812** | **7.812** | **7.812** | **7.812** | **7.812** | **7.812** |
| 5 | | | | | | | | | | | | |
| 6 | Estimated FEI 2023 Delivery Rate Increase | Section 5.3.1 of Application | | 8.07% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% |
| 7 | Residential Margin at Existing Rate ($000s) | 2022: G-366-21, Sch 19, Ln 3, Col 3; 2023: Prior Yr Ln 4 x Ln 12 | 545,063 | 589,061 | 636,598 | 636,598 | 636,598 | 636,598 | 636,598 | 636,598 | 636,598 | 636,598 |
| 8 | Residential Deficiency/(Surplus) | 2022: G-366-21, Sch 19, Ln 3, Col 4; 2023: Ln 7 x Ln 6 | 43,998 | 47,537 | - | - | - | - | - | - | - | - |
| 9 | Residential Margin at Revised Rate ($000) | Line 7 + Line 8 | 589,061 | 636,598 | 636,598 | 636,598 | 636,598 | 636,598 | 636,598 | 636,598 | 636,598 | 636,598 |
| 10 | | | | | | | | | | | | |
| 11 | Forecast Residential Customer | 2022: G-366-21, Sch 19, Ln 3, Col 9 | 969,238 | 969,238 | 969,238 | 969,238 | 969,238 | 969,238 | 969,238 | 969,238 | 969,238 | 969,238 |
| 12 | Forecast Residential Volume (TJ) | 2022: G-366-21, Sch 19, Ln 3, Col 10 | 81,494 | 81,494 | 81,494 | 81,494 | 81,494 | 81,494 | 81,494 | 81,494 | 81,494 | 81,494 |
| 13 | | | | | | | | | | | | |
| 14 | **FEFN** | | | | | | | | | | | |
| 15 | Residential Existing Effective Delivery Rate ($/GJ) | 2022: Line 20 / Line 25; 2023 Onward: Line 17 | 5.192 | 5.370 | 5.611 | 5.864 | 6.128 | 6.404 | 6.692 | 6.993 | 7.308 | 7.637 |
| 16 | Change in Effective Delivery Rate ($/GJ) | Line 21 / Line 25 | 0.177 | 0.242 | 0.253 | 0.264 | 0.276 | 0.288 | 0.301 | 0.315 | 0.329 | 0.344 |
| 17 | **Residential Effective Delivery Rate ($/GJ)** | Line 15 + Line 16 | **5.370** | **5.611** | **5.864** | **6.128** | **6.404** | **6.692** | **6.993** | **7.308** | **7.637** | **7.981** |
| 18 | | | | | | | | | | | | |
| 19 | Delivery Rate Increase | Line 21 / Line 20 | 3.41% | 4.50% | 4.50% | 4.50% | 4.50% | 4.50% | 4.50% | 4.50% | 4.50% | 4.50% |
| 20 | Residential Margin at Existing Rate ($000s) | 2022: App E-1, Sch 15, Ln 3, Col 3; 2023: Prior Yr, Ln 17 x Ln 25 | 1,214 | 1,201 | 1,201 | 1,201 | 1,201 | 1,201 | 1,201 | 1,201 | 1,201 | 1,201 |
| 21 | Residential Deficiency/(Surplus) | 2022: App E-1, Sch 15, Ln 3, Col 4; 2023: Ln 22 - Ln 20 | 41 | 54 | 54 | 54 | 54 | 54 | 54 | 54 | 54 | 54 |
| 22 | Residential Margin at Revised Rate ($000) | 2022: Line 20 + Line 21; 2023: Equal to 2022 | 1,255 | 1,255 | 1,255 | 1,255 | 1,255 | 1,255 | 1,255 | 1,255 | 1,255 | 1,255 |
| 23 | | | | | | | | | | | | |
| 24 | Forecast Residential Customer | 2022: App E-1, Sch 15, Ln 3, Col 9; 2023: Equal to 2022 | 1,854 | 1,854 | 1,854 | 1,854 | 1,854 | 1,854 | 1,854 | 1,854 | 1,854 | 1,854 |
| 25 | Forecast Residential Volume (TJ) | 2022: App E-1, Sch 15, Ln 3, Col 10; 2023: Ln 30 | 234 | 224 | 214 | 205 | 196 | 188 | 180 | 172 | 164 | 157 |
| 26 | | | | | | | | | | | | |
| 27 | **Total Volume Reduction (TJ)** | | | **(20)** | **(20)** | **(20)** | **(20)** | **(20)** | **(20)** | **(20)** | **(20)** | **(20)** |
| 28 | | | | | | | | | | | | |
| 29 | Volume by Rate Classes | | | | | | | | | | | |
| 30 | RS 1 | 2022: App E-1, Sch 15, Ln 3, Col 10; 2023: Ln 33 x Prior Yr: Ln 30 / Ln 33 | 234 | 224 | 214 | 205 | 196 | 188 | 180 | 172 | 164 | 157 |
| 31 | RS 2 | 2022: App E-1, Sch 15, Ln 5, Col 10; 2023: Prior Yr + Ln 25 | 150 | 144 | 138 | 132 | 126 | 121 | 115 | 110 | 106 | 101 |
| 32 | RS 3 | 2022: App E-1, Sch 15, Ln 6, Col 10; 2023: Prior Yr + Ln 26 | 87 | 83 | 80 | 76 | 73 | 70 | 67 | 64 | 61 | 59 |
| 33 | Total | 2022: App E-1, Sch 15, Ln 7, Col 10; 2023: Prior Yr + Ln 27 | 471 | 451 | 431 | 410 | 390 | 370 | 349 | 329 | 309 | 289 |

As Table 2 above shows, if FEFN's total demand continues to decline by 20.3 TJ per year, FEFN's residential (RS 1) customers' delivery rates will exceed FEI's by 2031. This scenario is reasonable, but should not be considered in isolation.

**Table 3: Response to RCIA IR1 3.2**

| Line | Particular | Reference | 2022 | 2023 | 2024 | 2025 |
|---|---|---|---|---|---|---|
| 1 | **FEI** | | | | | |
| 2 | Residential Existing Effective Delivery Rate ($/GJ) | 2022: Line 7 / Line 12; 2023+: Line 4 | 6.688 | 7.228 | 7.812 | 7.812 |
| 3 | Change in Effective Delivery Rate ($/GJ) | Line 8 / Line 12 | 0.540 | 0.583 | - | - |
| 4 | **Residential Effective Delivery Rate ($/GJ)** | Line 2 + Line 3 | **7.228** | **7.812** | **7.812** | **7.812** |
| 5 | | | | | | |
| 6 | Estimated FEI 2023 Delivery Rate Increase | Section 5.3.1 of Application | | 8.07% | 0.00% | 0.00% |
| 7 | Residential Margin at Existing Rate ($000s) | 2022: G-366-21, Sch 19, Ln 3, Col 3; 2023+: Prior Yr Ln 4 x Ln 12 | 545,063 | 589,061 | 636,598 | 636,598 |
| 8 | Residential Deficiency/(Surplus) | 2022: G-366-21, Sch 19, Ln 3, Col 4; 2023+: Ln 7 x Ln 6 | 43,998 | 47,537 | - | - |
| 9 | Residential Margin at Revised Rate ($000) | Line 7 + Line 8 | 589,061 | 636,598 | 636,598 | 636,598 |
| 10 | | | | | | |
| 11 | Forecast Residential Customer | G-366-21, Sch 19, Ln 3, Col 9 | 969,238 | 969,238 | 969,238 | 969,238 |
| 12 | Forecast Residential Volume (TJ) | G-366-21, Sch 19, Ln 3, Col 10 | 81,494 | 81,494 | 81,494 | 81,494 |
| 13 | | | | | | |
| 14 | **FEFN** | | | | | |
| 15 | Residential Existing Effective Delivery Rate ($/GJ) | 2022: Line 20 / Line 25; 2023+: Line 17 | 5.192 | 5.370 | 5.889 | 6.224 |
| 16 | Change in Effective Delivery Rate ($/GJ) | Line 21 / Line 25 | 0.177 | 0.520 | 0.335 | 1.588 |
| 17 | **Residential Effective Delivery Rate ($/GJ)** | Line 15 + Line 16 | **5.370** | **5.889** | **6.224** | **7.812** |
| 18 | | | | | | |
| 19 | Delivery Rate Increase | Line 21 / Line 20 | 3.41% | 9.68% | 5.68% | 25.51% |
| 20 | Residential Margin at Existing Rate ($000s) | 2022: App E-1, Sch 15, Ln 3, Col 3; 2023+: Prior Yr, Ln 17 x Ln 25 | 1,214 | 1,233 | 1,353 | 1,430 |
| 21 | Residential Deficiency/(Surplus) | Line 22 - Line 20 | 41 | 119 | 77 | 365 |
| 22 | Residential Margin at Revised Rate ($000) | Line 31 | 1,255 | 1,353 | 1,430 | 1,794 |
| 23 | | | | | | |
| 24 | Forecast Residential Customer | App E-1, Sch 15, Ln 3, Col 9 | 1,854 | 1,842 | 1,842 | 1,842 |
| 25 | Forecast Residential Volume (TJ) | App E-1, Sch 15, Ln 3, Col 10 | 234 | 230 | 230 | 230 |
| 26 | | | | | | |
| 27 | **Capital Additions ($000s)** | | | | **9,697** | - |
| 28 | **Equivalent Incremental Delivery Margin ($000s)** | | | | **151** | **715** |
| 29 | | | | | | |
| 30 | Incrememtal Delivery Margin by Rate Classes ($000s) | | | | | |
| 31 | RS 1 | 2022: App E-1, Sch 15, Ln 3, Col 5; 2023+: Ln 34 x Prior Yr: Ln 31 / Ln 34 | 1,255 | 1,353 | 1,430 | 1,794 |
| 32 | RS 2 | 2022: App E-1, Sch 15, Ln 5, Col 5; 2023+: Prior Yr + Ln 25 | 897 | 942 | 996 | 1,249 |
| 33 | RS 3 | 2022: App E-1, Sch 15, Ln 6, Col 5; 2023+: Prior Yr + Ln 26 | 365 | 358 | 378 | 475 |
| 34 | Total ($000s) | 2022: App E-1, Sch 15, Ln 7, Col 5; 2023+: Prior Yr + Ln 28 | 2,517 | 2,653 | 2,804 | 3,519 |

As shown in Table 3 above, if the capital additions in 2024 are approximately $9.697 million, then FEFN's residential (RS 1) delivery rate will be at parity with FEI in the following year in 2025. This scenario is highly improbable.

**Table 4: Response to RCIA IR1 3.3**

| Line | Particular | Reference | 2022 | 2023 | 2024 | 2025 | 2026 | 2027 | 2028 | 2029 | 2030 | 2031 | 2032 | 2033 | 2034 | 2035 | 2036 |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 1 | **FEI** | | | | | | | | | | | | | | | | |
| 2 | Residential Existing Effective Delivery Rate ($/GJ) | 2022: Line 7 / Line 12; 2023+: Line 4 | 6.688 | 7.228 | 7.812 | 7.812 | 7.812 | 7.812 | 7.812 | 7.812 | 7.812 | 7.812 | 7.812 | 7.812 | 7.812 | 7.812 | 7.812 |
| 3 | Change in Effective Delivery Rate ($/GJ) | Line 8 / Line 12 | 0.540 | 0.583 | - | - | - | - | - | - | - | - | - | - | - | - | - |
| 4 | **Residential Effective Delivery Rate ($/GJ)** | Line 2 + Line 3 | **7.228** | **7.812** | **7.812** | **7.812** | **7.812** | **7.812** | **7.812** | **7.812** | **7.812** | **7.812** | **7.812** | **7.812** | **7.812** | **7.812** | **7.812** |
| 5 | | | | | | | | | | | | | | | | | |
| 6 | Estimated FEI 2023 Delivery Rate Increase | Section 5.3.1 of Application | | 8.07% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% |
| 7 | Residential Margin at Existing Rate ($000s) | 2022: G-366-21, Sch 19, Ln 3, Col 3; 2023+: Prior Yr Ln 4 x Ln 12 | 545,063 | 589,061 | 636,598 | 636,598 | 636,598 | 636,598 | 636,598 | 636,598 | 636,598 | 636,598 | 636,598 | 636,598 | 636,598 | 636,598 | 636,598 |
| 8 | Residential Deficiency/(Surplus) | 2022: G-366-21, Sch 19, Ln 3, Col 4; 2023+: Ln 7 x Ln 6 | 43,998 | 47,537 | - | - | - | - | - | - | - | - | - | - | - | - | - |
| 9 | Residential Margin at Revised Rate ($000) | Line 7 + Line 8 | 589,061 | 636,598 | 636,598 | 636,598 | 636,598 | 636,598 | 636,598 | 636,598 | 636,598 | 636,598 | 636,598 | 636,598 | 636,598 | 636,598 | 636,598 |
| 10 | | | | | | | | | | | | | | | | | |
| 11 | Forecast Residential Customer | G-366-21, Sch 19, Ln 3, Col 9 | 969,238 | 969,238 | 969,238 | 969,238 | 969,238 | 969,238 | 969,238 | 969,238 | 969,238 | 969,238 | 969,238 | 969,238 | 969,238 | 969,238 | 969,238 |
| 12 | Forecast Residential Volume (TJ) | G-366-21, Sch 19, Ln 3, Col 10 | 81,494 | 81,494 | 81,494 | 81,494 | 81,494 | 81,494 | 81,494 | 81,494 | 81,494 | 81,494 | 81,494 | 81,494 | 81,494 | 81,494 | 81,494 |
| 13 | | | | | | | | | | | | | | | | | |
| 14 | **FEFN** | | | | | | | | | | | | | | | | |
| 15 | Residential Existing Effective Delivery Rate ($/GJ) | 2022: Line 20 / Line 25; 2023+: Line 17 | 5.192 | 5.370 | 5.889 | 6.071 | 6.233 | 6.393 | 6.550 | 6.720 | 6.870 | 7.018 | 7.163 | 7.304 | 7.443 | 7.578 | 7.710 |
| 16 | Change in Effective Delivery Rate ($/GJ) | Line 21 / Line 25 | 0.177 | 0.520 | 0.182 | 0.162 | 0.160 | 0.157 | 0.170 | 0.150 | 0.148 | 0.145 | 0.142 | 0.139 | 0.135 | 0.132 | 0.129 |
| 17 | **Residential Effective Delivery Rate ($/GJ)** | Line 15 + Line 16 | **5.370** | **5.889** | **6.071** | **6.233** | **6.393** | **6.550** | **6.720** | **6.870** | **7.018** | **7.163** | **7.304** | **7.443** | **7.578** | **7.710** | **7.839** |
| 18 | | | | | | | | | | | | | | | | | |
| 19 | Delivery Rate Increase | Line 21 / Line 20 | 3.41% | 9.68% | 3.09% | 2.67% | 2.56% | 2.45% | 2.60% | 2.24% | 2.15% | 2.06% | 1.98% | 1.90% | 1.82% | 1.74% | 1.67% |
| 20 | Residential Margin at Existing Rate ($000s) | 2022: App E-1, Sch 15, Ln 3, Col 3; 2023+: Prior Yr, Ln 17 x Ln 25 | 1,214 | 1,233 | 1,353 | 1,395 | 1,432 | 1,468 | 1,504 | 1,544 | 1,578 | 1,612 | 1,645 | 1,678 | 1,710 | 1,741 | 1,771 |
| 21 | Residential Deficiency/(Surplus) | Line 22 - Line 20 | 41 | 119 | 42 | 37 | 37 | 36 | 39 | 35 | 34 | 33 | 33 | 32 | 31 | 30 | 30 |
| 22 | Residential Margin at Revised Rate ($000) | Line 31 | 1,255 | 1,353 | 1,395 | 1,432 | 1,468 | 1,504 | 1,544 | 1,578 | 1,612 | 1,645 | 1,678 | 1,710 | 1,741 | 1,771 | 1,801 |
| 23 | | | | | | | | | | | | | | | | | |
| 24 | Forecast Residential Customer | App E-1, Sch 15, Ln 3, Col 9 | 1,854 | 1,842 | 1,842 | 1,842 | 1,842 | 1,842 | 1,842 | 1,842 | 1,842 | 1,842 | 1,842 | 1,842 | 1,842 | 1,842 | 1,842 |
| 25 | Forecast Residential Volume (TJ) | App E-1, Sch 15, Ln 3, Col 10 | 234 | 230 | 230 | 230 | 230 | 230 | 230 | 230 | 230 | 230 | 230 | 230 | 230 | 230 | 230 |
| 26 | | | | | | | | | | | | | | | | | |
| 27 | **Capital Additions ($000s)** | | | | **721** | **721** | **721** | **721** | **721** | **721** | **721** | **721** | **721** | **721** | **721** | **721** | **721** |
| 28 | **Equivalent Incremental Delivery Margin ($000s)** | | | | **82** | **73** | **72** | **71** | **77** | **68** | **66** | **65** | **64** | **62** | **61** | **60** | **58** |
| 29 | | | | | | | | | | | | | | | | | |
| 30 | Incrememtal Delivery Margin by Rate Classes ($000s) | | | | | | | | | | | | | | | | |
| 31 | RS 1 | 2022: App E-1, Sch 15, Ln 3, Col 5; 2023+: Ln 34 x Prior Yr: Ln 31 / Ln 34 | 1,255 | 1,353 | 1,395 | 1,432 | 1,468 | 1,504 | 1,544 | 1,578 | 1,612 | 1,645 | 1,678 | 1,710 | 1,741 | 1,771 | 1,801 |
| 32 | RS 2 | 2022: App E-1, Sch 15, Ln 5, Col 5; 2023+: Prior Yr + Ln 25 | 897 | 942 | 971 | 997 | 1,023 | 1,048 | 1,075 | 1,099 | 1,123 | 1,146 | 1,168 | 1,190 | 1,212 | 1,233 | 1,254 |
| 33 | RS 3 | 2022: App E-1, Sch 15, Ln 6, Col 5; 2023+: Prior Yr + Ln 26 | 365 | 358 | 369 | 379 | 389 | 398 | 408 | 418 | 427 | 435 | 444 | 452 | 461 | 469 | 477 |
| 34 | Total ($000s) | 2022: App E-1, Sch 15, Ln 7, Col 5; 2023+: Prior Yr + Ln 28 | 2,517 | 2,653 | 2,735 | 2,808 | 2,879 | 2,950 | 3,027 | 3,095 | 3,161 | 3,226 | 3,290 | 3,352 | 3,413 | 3,473 | 3,531 |

As Table 4 above shows, if FEFN's capital additions are $721 thousand annually, FEFN's residential (RS 1) customers' delivery rate will exceed FEI's by 2036. This scenario is possible but should not be considered in isolation.

FEI notes that Table 4-6 of the Application as referenced in the preamble to RCIA IR1 3.3 only included capital additions related to FEFN's transmission and distribution plant (i.e., $626 thousand) and excluded capital additions related to intangible and general plant. As such, FEI assumed the annual capital additions related to FEFN's intangible and general plant remain at the 2022 forecast level as shown in Table 8-10 of the Application (i.e., $42 thousand and $53 thousand, respectively). Including capital additions for intangible and general plant in the total, the total annual capital additions for the purposes of this analysis are $721 thousand ($626 thousand + $42 thousand + $53 thousand).

2.2 Assuming the stated decline trend of 20.3 TJs per year continues, in what year would FEI project that FEFN Rate Schedule 1 (residential) rates would achieve parity with FEI's Rate Schedule 1 rates?

**<u>Response:</u>**

Please refer to the response to RCIA IR1 2.1.

**3. Reference: Exhibit B-1, Application, pp. 31-34, 44**

**Increases in Capital Expenditures and Impact to FEFN Rates**

At page 31 of the Application, FEI states: "As previously explained, Fort Nelson currently maintains a separate rate base from FEI and, as a result, increases to rate base driven by, among other things, large capital projects and ongoing sustainment activities are absorbed by Fort

Nelson's small customer base through delivery rate increases. In the case of large capital projects, the delivery rate impact can be very significant, as was the case with the Muskwa River Crossing Project which entered rate base in 2015 and was the primary driver of an approximately 16.67 percent delivery rate increase in 2015."

At page 32 of the Application, FEI states: "For the distribution system, FEI has been undertaking a distribution mains renewal program for FEFN since 2017 for the purpose of reducing the risk to public safety and the likelihood of FEFN having to undertake an emergency response due to leaks discovered."

At page 33 of the Application, FEI states: "In Table 4-6 below, FEI identifies a number of sustainment capital projects to both the transmission and distribution systems that are currently projected to be completed and in-service by the end of 2021, as well as forecasts for 2022 and 2023, though the timing and cost of these projects may be subject to change as development of the projects progress."

**Table 4-6: 2021 Projected and 2022 & 2023 Forecast Significant Capital Additions ($000s)**

| | 2021 Projected | 2022 Forecast | 2023 Forecast |
|---|---|---|---|
| **Transmission System** | | | |
| Fort Nelson Control Station - Install Telemetry | $ 278 | $ 10 | |
| Fort Nelson Control Station - Install Gradient Control Mat | 93 | 2 | |
| **Subtotal** | **$ 371** | **$ 12** | **$ -** |
| **Distribution System** | | | |
| Main Replacements/Renewal Program | $ 355 | $ 167 | $ 167 |
| Recreation Centre District Station - Upgrade | | 623 | 32 |
| Main Alteration - Tamarack Crescent | 150 | | |
| **Subtotal** | **$ 505** | **$ 790** | **$ 199** |
| **Total** | **$ 876** | **$ 803** | **$ 199** |

At page 44 of the Application, FEI estimates delivery rate increases for 2022 and 2023.

3.1 Please confirm whether the rate increases forecasted for FEFN at page 44 of the Application and considered in the evaluation of the common rate options factor in the capital expenditures in Table 4-6.

3.1.1. If not confirmed, explain why not.

**Response:**

Confirmed. The delivery rate increases for 2022 and 2023 as well as the evaluation of the common rate options include the capital additions shown in Table 4-6 of the Application.

FEI also clarifies that Table 4-6 of the Application shows the projected/forecast capital additions from 2021 to 2023, not capital expenditures, as this is consistent with how FEI presents the FEFN actual/projected/forecast capital in FEFN's revenue requirement applications.

3.2 What level of capital expenditures in 2024 would be required to result in an increase to FEFN Rate Schedule 1 (residential) rates such that they achieve parity with FEI's Rate Schedule 1 rates (in 2024 or any subsequent year)?

**Response:**

Please refer to the response to RCIA IR1 2.1.

3.3 Assuming capital expenditures are incurred annually in future years at the 3-year average of $626,000, in what year would FEI project that FEFN Rate Schedule 1 (residential) rates would achieve parity with FEI's Rate Schedule 1 rates (assuming that other revenue requirements and demand remain unchanged)?

**Response:**

Please refer to the response to RCIA IR1 2.1.

**4. Reference: Exhibit B-1, Application, p. 37**

**Amendments to Terms and Conditions of Service**

At page 37 of the Application, FEI states: "With the implementation in 2018 of the rate design changes approved in the RDA Decision, FEFN's rate structure, rate schedules and General Terms and Conditions are now aligned with FEI."

4.1 Will the adoption of common rates for FEFN require any further changes to the terms and conditions of service for FEFN customers? If so, please identify the changes.

**Response:**

The adoption of common rates for FEFN will not require further changes to the terms and conditions of service as FEI's General Terms and Conditions (GT&Cs)[6] are currently applicable to FEFN.

4.2 Will there be any changes to the rates for chargeable services provided by FEI such as: damage repairs, meter disputes, service alterations, appliance relights, etc.?

**Response:**

No. Please refer to the response to RCIA IR1 4.1.

4.3 Can FEFN customers expect any changes or improvements to the services they receive as a result of adopting common rates?

**Response:**

As explained in the response to BCUC IR1 22.1, there will be no change to the operations in the Fort Nelson service area. The field employees in Fort Nelson will continue to serve the Fort Nelson service area, and the supporting operations, management, and administrative activities will continue to be provided by other departments within FEI. However, as explained in the response to BCUC IR1 31.2, FEFN's customers will benefit in the future from an expansion of service offerings if common rates are approved, as FEI plans to offer its renewable gas program to FEFN customers subsequent to the completion of the Comprehensive Review and Application

[6] Including the Standard Charges Schedule and applicable charges.

for a Revised Renewable Gas Program regulatory process which is currently underway with the BCUC.

## C. REVIEW OF COMMON RATE OPTIONS

**5. Reference: Exhibit B-1, Application, pp. 43-55**

At page 43 of the Application, FEI states: "FEI evaluated the following four common rate options:

1. Status quo (i.e., FEFN continues to have a separate rate base and rates);
2. Common delivery rates only;
3. Full transition to common rates (i.e., common delivery, cost of gas, and midstream rates); and
4. Common delivery and cost of gas rates, and amalgamation 1 of FEFN's gas cost portfolios."

FEI goes on to provide the average bill impacts for each of the Options 1 through 4 in Tables 5-3, 5-6, 5-9, and 5-14, respectively.

5.1 Provide the calculations that support the bill impacts in Tables 5-3, 5-6, 5-9, and 5-14 (ideally in the form of a functional spreadsheet with formulas intact).

**Response:**

Please refer to Attachment 5.1 for Tables 5-3, 5-6, 5-9, and 5-14 in Excel format.

5.2 Provide the percentage bill impact for each option and rate class in Tables 5-3, 5-6, 5-9, and 5-14.

**Response:**

Please refer to the revised Table 5-3 below for the percentage bill impact of the Status Quo option. For the bill impacts in percentage terms for Options 2, 3 and 4 (i.e., Tables 5-6, 5-9, and 5-14), please refer to the response to BCUC IR1 11.3.

**Revised Table 5-3: Estimated FEFN Average Bill Impact in 2022 and 2023 under Option 1**

| | Avg. UPC (GJ) | Bill Impact in 2022 ($) | Bill Impact in 2022 (%) | Bill Impact in 2023 ($) | Bill Impact in 2023 (%) |
|---|---|---|---|---|---|
| Residential RS 1 | 125 | 22 | 2.2% | 63 | 3.9% |
| Small Commerical RS 2 | 335 | 65 | 2.2% | 191 | 4.3% |
| Large Commerical RS 3 | 6,375 | 835 | 1.8% | 2,486 | 3.7% |

**6. Reference: Exhibit B-1, Application, pp. 51-52**

**Common Midstream Rates**

At page 51 of the Application, FEI states: "Under Option 4, FEI proposes to move FEFN to common delivery and cost of gas rates while maintaining FEFN's midstream (storage & transport) rates at a level consistent with what FEFN is currently being charged. This approach will achieve the benefits of common delivery rates discussed previously, and transition FEFN customers to a common cost of gas rate with FEI without the significant negative bill impact to FEFN customers seen in Option 3 (Full Common Rates)."

At page 52 of the Application, FEI states: "In order to transition FEFN to a common cost of gas rate with FEI while maintaining FEFN's midstream rate at a similar level to what FEFN customers currently pay, FEI proposes to amalgamate the costs of FEI and FEFN's natural gas supply

portfolios through FEI's existing MCRA, as follows, with the same effective date of January 1, 2023:

…

5. Starting January 1, 2023, set FEFN's midstream rates based on 5 percent of FEI's midstream rates which are a level similar to FEFN's existing midstream rates."

6.1 Explain whether the purpose of making the proposed accounting changes to include FEFN's midstream costs in the MCRA is to reduce regulatory effort and expenses by eliminating the need to prepare and file MCRA reports. If there are other purposes, please explain.

**Response:**

The purpose of making the proposed accounting changes to include FEFN's midstream costs in the MCRA is not solely to reduce regulatory effort, although, as explained in Section 5 of the Application, the Proposed Common Rate Option would eliminate the need to prepare and file separate quarterly gas cost reports for FEFN. FEI notes that the quarterly gas cost reports are not typically reviewed by the BCUC through a public hearing process and, therefore, there would be no reduction in external regulatory costs associated with moving to common cost of gas rates, only a reduction in regulatory effort internally.

The key purpose of making the proposed accounting changes to include FEFN's midstream costs in the MCRA is to achieve the greatest alignment of rates (i.e., common rates) between FEI and FEFN as possible without causing significant negative bill impacts to FEFN's customers (these are two of the Objectives discussed in Section 5.2 of the Application). As explained in the responses to FNDCC-NRRM IR1 19.1 and 19.2, FEI developed the Proposed Common Rate Option in part based on the feedback received from customers and stakeholders regarding concerns over rate increases and concerns over paying the same midstream (i.e., storage and transport) rates as FEI customers, given FEFN's proximity to the Fort Nelson gas plant. These concerns were a key driver in FEI developing a common rate option that maintained FEFN's storage and transport rates at a level consistent with what FEFN customers are currently paying. Based on these considerations, and due to the interrelated nature of the rate setting mechanisms for FEFN's commodity and midstream rates as explained in the response to FNDCC-NRRM IR1 5.1, FEI developed the Proposed Common Rate Option.

6.2 Explain whether FEFN's midstream costs could continue to be separately tracked and charged to FEFN customers under the overall approach of Option 4. Identify the pros and cons of this approach.

**Response:**

FEFN's gas supply costs will continue to be tracked separately under the Proposed Common Rate Option. However, as explained in the response to FNDCC-NRRM IR1 5.1, it would not be possible to continue to charge FEFN customers the same midstream rates if FEFN moves to common commodity rates with FEI because the rate setting mechanisms for FEFN's commodity and midstream rates are interrelated.

6.3 Could reduced regulatory costs be achieved if FEI maintained separate midstream rates for FEFN but prepared and filed this information as a subset of its MCRA filings for FEI?

**Response:**

As explained in the response to RCIA IR1 6.1, there are no external regulatory costs typically associated with gas cost filings; therefore, common cost of gas rates would eliminate regulatory effort but not incremental regulatory costs.

6.4 What is the proportion of FEFN's midstream costs attributed to regulatory filings?

**Response:**

FEI clarifies that the regulatory filing costs referred to in Section 5.2.1 of the Application are external regulatory costs associated with public hearing processes, not internal costs. As explained in the responses to RCIA IR1 6.1 and 6.3, the quarterly gas cost reports do not typically undergo a public hearing process with the BCUC; therefore, external regulatory costs are not typically incurred.

**7. Reference: Exhibit B-1, Application, p.58; BCUC IR1, IR 12.1**

**Phase-In of Delivery Rates**

At page 58 of the Application, FEI states: "FEI seeks to mitigate this bill impact to FEFN's residential customers and, therefore, proposes to phase in the transition of common delivery rates for FEFN's residential customers over a 10-year period through a phase-in delivery rate rider. FEI notes the phase-in rider will apply to residential customers only while FEFN's commercial customers will fully transition to common delivery rates in 2023."

BCUC IR1 12.1 states: "Please discuss whether FEI considered using other methodologies to determine its base assumptions used to evaluate the bill impacts for FEFN customers of adopting common rates. If not, please explain why not."

7.1 Further to BCUC IR1 12.1, explain why FEI selected a 10-year period for the phase-in rate rider and not some other period.

**<u>Response:</u>**

Please refer to the responses to BCUC IR1 30.1 and 30.2.

**8. Reference: BCUC IR1, IR 10.2 Cost Allocation Study**

In IR1 10.2, the BCUC requests: "Please explain whether FEI has undertaken a cost allocation study or any other analysis as it relates to the "careful consideration of equities" amongst all of FEI's customers combined including FEFN. Please provide the results of the analysis if available. If not, please explain why not."

8.1 If FEI has a cost allocation study for FEFN, provide a table of forecasted delivery revenues and allocated delivery costs by rate class and calculate the revenue-to-cost ratios.

**Response:**

FEI notes that BCUC IR1 10.2, as referenced in the preamble above, is referring to the costs allocated from FEI to FEFN through the shared services fee within FEFN's O&M expense. It is not referring to the Cost of Service Allocation (COSA) study that was done specifically for FEFN (i.e., an allocation of FEFN's cost of service among the different rate classes within FEFN). The last COSA study for FEFN was undertaken as part of the 2016 Rate Design Application (RDA), approved by Orders G-4-18 and G-135-18 (RDA Decision). The next COSA study will be filed in 2023 in compliance with the RDA Decision, which directed FEI to file a COSA study five years after the release of the RDA Decision. Please refer to the screen capture below for FEFN's revenue-to-cost (R:C) ratios as a result of FEI's 2016 RDA (i.e., COSA after Rate Design Proposals and Rebalancing). FEI does not have an updated COSA study since the 2016 RDA.

**Table 13-27: Revenue to Cost and Margin to Cost Ratios after rebalancing**

| Rate Schedule | COSA after Rate Design Proposals | | Rebalance Amount ($000) | Approximate Annual Bill Change | COSA after Rate Design Proposals and Rebalancing | |
|---|---|---|---|---|---|---|
| | R:C | M:C | | | R:C | M:C |
| **Rate 1**<br>*Domestic (Residential) Service* | 91.7% | 89.4% | 66.5 | 5.4% | 95.9% | 94.8% |
| **Rate 2.1**<br>*General (Small Commercial) Service* | 108.2% | 110.8% | (35.0) | -2.2% | 105.0% | 106.6% |
| **Rate 2.2**<br>*General (Large Commercial) Service* | 115.8% | 120.0% | (37.2) | -8.6% | 105.0% | 106.4% |
| **Rate Schedule 25**<br>*General Firm Transportation Service* | 91.5% | 91.5% | 5.7 | 6.2% | 95.0% | 95.0% |

## Attachment 5.1

# REFER TO LIVE SPREADSHEET MODEL

Provided in electronic format only

(accessible by opening the Attachments Tab in Adobe)