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May 16, 2022

GNAR Sustainable Home Design  
206-1420 Alpha Lake Rd,  
Whistler, B.C  
V8E 0R8

Attention: Mr. Edgar Dearden

Dear Mr. Deardon:

**Re: FortisBC Energy Inc. (FEI)**  
**Revised Renewable Gas Program Application – Stage 2 (Application)**  
**Response to the GNAR Sustainable Home Design (GNAR) Information Request (IR) No. 1**

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On December 17, 2021, FEI filed the Application referenced above. In accordance with the amended regulatory timetable established in BCUC Order G-103-22 and as amended in Exhibit A-11 for the review of the Application, FEI respectfully submits the attached response to GNAR IR No. 1.

In other proceedings,<sup>1</sup> the BCUC has set out its expectations regarding the appropriate style and substance of IRs under Rules 13.01-13.02 of the *Rules and Practice and Procedure*. In particular, the BCUC stated:

The BCUC reminds all interveners that the purpose of IRs is not to enable the author of the IR to introduce evidence. The purpose of IRs is to elicit relevant information on the evidentiary record or to clarify or test existing evidence to contribute to a better understanding by the BCUC of the relevant issues in the proceeding. Any statements that are included in the preamble to an IR should be restricted to providing context for a question relevant to the proceeding submitted by the party to whom the IR is directed.

Finally, whereas letters of comment are intended to provide for any member of the public to contribute views, opinions, and impact or

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<sup>1</sup> In the matter of the *FEI Application for a CPCN for the Advanced Metering Infrastructure Project*, in its letter dated September 28, 2021 (Ex. A-15).

potential impact, with respect to a matter before the BCUC, IRs must not be letters of comment.

GNAR has provided preambles to information requests that contain a significant amount of content with which FEI takes issue. In many instances, the manner in which GNAR has framed its information requests appears to attempt to provide intervener evidence, which is procedurally improper. A preamble to an information request is not evidence, as affirmed by the BCUC, its only purpose is to provide context for why the intervener is asking the question.

FEI has responded to the information requests by focusing on the questions themselves, rather than parsing and rebutting each preamble. However, FEI wishes to be clear that the preambles contain inaccuracies and characterizations that FEI does not accept. As such, FEI's silence regarding the content of a preamble should not be interpreted as agreement.

FEI will object to any attempt by GNAR to rely on the content of preambles to its information requests in final argument.

Finally, for convenience and efficiency, FEI has occasionally provided an internet address for referenced reports instead of attaching lengthy documents to its IR responses. FEI intends for the referenced documents to form part of its IR responses and the evidentiary record in this proceeding.

If further information is required, please contact the undersigned.

Sincerely,

**FORTISBC ENERGY INC.**

***Original signed:***

Diane Roy

Attachments

cc (email only): Registered Parties

FortisBC Energy Inc. (FEI or the Company) Revised Renewable Gas Program Application – Stage 2 (Application)	Submission Date: May 16, 2022
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1     **Reference:                   Exhibiti B-11, Letter dated December 17, 2021 – FEI submitting the**  
2                                   **Stage 2 Comprehensive Review and Application for a Revised**  
3                                   **Renewable Gas Program**

4             1.0     On page 2 of the Application, FEI states the following:

5                             “FEI proposes a new Residential Gas Connections service under which FEI will  
6                             permanently provide 100 percent Renewable Gas to new residential dwellings  
7                             attaching to the system by a service line installed on or after the date of  
8                             implementation of the service.”

9             A fraudulent statement is a statement related to a material fact and known to be untrue or  
10            made with reckless indifference as to its truth or falsity. A statement or representation may  
11            also be "false" or "fraudulent" when it constitutes a half truth, or effectively conceals a  
12            material fact.

13            It is my understanding that you do not supply a different percentage of biomethane to  
14            customers. Whether they are on a 1% biomethane blend or a 100% biomethane blend,  
15            they will still receive predominantly methane gas from fossil sources (fossil gas). Many of  
16            our clients are FortisBC ratepayers, and we have quizzed them on this point, and we have  
17            found that very few, almost none, are aware of this fact.

18            In fact, on the FortisBC website it assures residential customers that they don't need to  
19            modify their gas appliances when they sign up for RNG, because RNG has the same  
20            properties as conventional gas. This specifically implies that a customer is receiving a  
21            different blend as their residence. The exact paragraph from the website reads:

22                             “Getting RNG is simple - Once you're signed up there's nothing else you need to do.  
23                             There's no need to upgrade your appliances or do anything differently, because RNG has  
24                             the same properties as conventional natural gas but without the carbon footprint.”

25            Retrieved March 3rd from: [https://www.fortisbc.com/services/sustainable-energy-  
26            options/renewable-natural-gas/sign-up-for-renewable-natural-gas](https://www.fortisbc.com/services/sustainable-energy-options/renewable-natural-gas/sign-up-for-renewable-natural-gas)

27            I am very confused by the use of this terminology both in this application, and on the  
28            FortisBC website. It seems to me that this is a lie and false marketing, and that no other  
29            company in the province would be allowed to get away with such a deceit. Fat free  
30            yoghurt\* (actually full fat, but we put some extra low fat in the other guy's). Diet cola\*  
31            (actually real cola, with 1% diet mixed in). High strength steel\* (actually 99% low strength  
32            with 1% high strength mixed in).

33            I feel that this is a preposterous statement. No company should be allowed to market a  
34            product they are incapable of delivering. The program is clearly an offset program, and as  
35            such it should be clearly labelled and described as such. We are in a very serious and  
36            urgent climate crisis which is getting worse by the day. The last thing we need is for

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1           deceitful language which confuses and misleads the public, not least from one of the  
2           largest utilities in the province.

3           1.1     Would a FEI customer in Whistler who has paid FEI to “provide 100 percent  
4           Renewable Gas” physically receive at their residence a blend of gas any different  
5           from another customer on the same street who is paying to receive the regular  
6           “natural gas” product?

7           1.2     If the answer to 1.1 is that both the RNG and NG customer would receive exactly  
8           the same blend, can you please explain how the statement “FEI will permanently  
9           provide 100 percent Renewable Gas to new residential dwellings”, on Page 2 of  
10          this application, as well as in FEI marketing materials, is not a fraudulent statement  
11          meant to mislead the public?

12  
13          **Response:**

14          Please refer to the response to BCOAPO IR1 10.1 for a description about how FEI uses receipt  
15          by displacement, which is common practice in the delivery of energy, to enable its customers to  
16          purchase various blends of Renewable Gas.

17

1   **2.0 Reference: Throughout the Application**

2   Throughout the Application, FEI uses the word “natural”. The word “natural” appears 427  
3   times throughout the document to describe two products which are:

- 4       • “Natural gas”, which in terms of the product actually sold to customers describes  
5       “hydrocarbon gas, which has been processed and dried, from fossil sources”.
- 6       • “Renewable Natural gas”, which in terms of the product actually sold to customers  
7       describes “hydrocarbon gas, which has been processed and dried, from biogenic  
8       sources”.

9   Using the naming this program as “natural” is misleading. For a start, neither of these  
10   chosen names contain any information which help customers to understand what exactly  
11   it is they are purchasing. And when sold to customers and supplied to them in their home,  
12   neither Natural Gas, nor Renewable Natural gas, are ‘natural’ in any case. Natural is a  
13   very misunderstood word in society, but dictionary definition of “natural” is:

14       *Natural (adjective): Present in or produced by nature, and not produced or changed*  
15       *artificially*

16       Retrieved March 3rd from: <https://www.thefreedictionary.com/natural>

17   Because of the confusion surrounding this topic, the word “Natural” has been regulated in  
18   Canada by two pieces of legislation; the Food and Drugs Act, and the Natural Health  
19   Products Regulations, for the stated reason in the legislation that "consumers may  
20   consider products described as "natural" of greater worth than those not so described".  
21   The requirements to call something natural in Canadian legislation include:

- 22       • not to contain, or to ever have contained, an added constituent or additive
- 23       • not to have any constituent or fraction thereof removed or significantly changed,  
24       except the removal of water
- 25       • not to have been submitted to processes that have significantly altered their  
26       original physical, chemical or biological state

27   Neither of the products described in the application, when sold to customers are therefore  
28   “natural”. They are both manufactured or heavily processed. Fossil gas from the ground  
29   undergoes at least 8 different and intensive processing steps, which add, remove and  
30   change constituents of the substance until the item which is marketed to consumers is  
31   completely indistinguishable from 'the stuff which comes out of the ground'. And the  
32   YouTube video on FortisBC’s page entitled “What is Renewable Natural Gas (RNG)?”  
33   explains very simply that the gas collected is “cleaned and purified”.

34   As per my understanding, the only thing which could be accurately called “natural gas”  
35   when referring to gas from fossil sources would be a pure unprocessed mix that comes  
36   straight from the ground with no processing. The composition of this substance which  
37   would look something like:









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1 inputs from non-renewable resources. In some jurisdictions, this extends to the use of electricity  
2 where it is generated from non-renewable sources.

3

4

5

6 3.2 If fossil fuel is burnt in the producing of Biomethane, would the above statement  
7 not be incorrect, as additional carbon is in fact added to atmosphere “producing  
8 and consuming” of Biomethane?

9

10 **Response:**

11 The above statement is correct. To clarify, the production and use of biomethane is carbon neutral  
12 because producing and consuming biomethane will not add any net new carbon into circulation.

13 Please refer to the responses to BCOAPO IR1 10.1 and CEC IR1 3.2 for further information on  
14 the carbon intensity of Renewable Gas and responses to the City of Richmond IR1 12 series for  
15 calculation of the carbon intensity of Renewable Gas.

16