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September 12, 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. 2

On December 17, 2021, FEI filed the Application referenced above. In accordance with the amended regulatory timetable established in British Columbia Utilities Commission (BCUC) Order G-165-22A, FEI respectfully submits the attached response to GNAR IR No. 2.

FEI has provided responses to GNAR IR2 3.10, 6.3 and 6.4 as, in accordance with BCUC Order G-214-22, only these IRs are within the scope of 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: September 12,

Response to GNAR Inc - Sustainable Home Design Information Request (IR) No. 2

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Topic: Do FEI customers understand what 'natural gas' and 'renewable natural gas' are?

Reference: The Application and B-23 FEI submitting responses to GNAR IR#1

In FEI's response to GNAR IR#1 FEI notes: 'FEI has not undertaken research specific to determining customers' understanding of the terms "natural gas" or "renewable natural gas".' GNAR Inc is particularly concerned about the language used in this application. 100% of our customers at GNAR Inc are FEI ratepayers, and a significant proportion of our customers do not know what these substances are. Over 50% of our customers when surveyed do not know that 'natural gas' is a fossil fuel. Many when asked what 'natural gas' is, gave a definition that would be applicable to so-called 'renewable natural gas' which is actually just biomethane. It is clear to GNAR Inc that the naming conventions in this application are causing considerable confusion amongst the public. Of a random selection of 5 baristas I recently quizzed on this topic, not one could answer correctly what 'natural gas' or 'renewable natural gas' are, and some of them again confused one for the other.

3.10 Does FEI provide a warning in its marketing material or contracts that 'renewable natural gas' contains the greenhouse gas methane?

Response:

Please refer to the response to CEC IR1 3.2 where FEI explains how biomethane is carbon neutral, and how capturing and using biomethane reduces the need to acquire conventional methane. Please also see the FortisBC website for more public information on biomethane.¹

https://www.fortisbc.com/services/sustainable-energy-options/renewable-natural-gas/so-what-is-renewable-natural-gas-anyway;see also https://fortisbc.com/services/sustainable-energy-options/renewable-natural-gas/what-is-renewable-natural-gas-and-how-is-it-made.



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1 6 Topic: Are FEI customers mistakenly under the impression they receive 100% biomethane

Reference: The Application and B-21 FEI submitting responses to BCOAPO Information Request No. 1

In their response to BCOAPO IR1 10.1 FEI notes "Conventional and renewable natural gas molecules are indistinguishable, as the combustion of both forms results in the same "physical volume" of GHG emissions being emitted into the atmosphere". Recent research by Harvard University has uncovered many toxic substances in samples of fossil gas supplied to residential homes, including benzene, toluene, hexane and cyclo-hexane. Recent research from Stanford has shown that combustion of hydrocarbon gas indoors causes considerable indoor air pollution, causing a 42% increase of asthma in children.

6.3 Does FEI notify customers in its marketing materials that they are receiving, or rather not receiving their '100% RNG blend', based on the principle of receipt by displacement?

Response:

FEI does not notify customers about receipt by displacement in marketing materials for any of the energy it provides. As explained in the response to BCOAPO IR1 10.1, this practice is not new and is used across North America to deliver gas and electricity to consumers without the need for a direct one to one connection to the source of the energy.

In particular, this practice negates the need for millions of separate power and gas lines from producers directly to individual customers. Renewable Gas is delivered by this same mechanism. While FEI does not provide information on receipt by displacement in its marketing materials, FEI does discuss this concept directly with large volume gas customers to help them understand energy delivery more broadly.

6.4 Does FEI notify customers in its contractual documents that they are receiving, or rather not receiving their '100% RNG blend', based on the principle of receipt by displacement?

Response:

Please refer to Sections 28.1 and 28.2 of the proposed amendments to FortisBC Energy Inc's General Terms and Conditions found in Appendix D-2 of the Application, which are reproduced below for ease of reference:

28.1 Notional Gas



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The location of generation facilities will determine where Low Carbon Gas wil
physically be introduced to the FortisBC Energy System. Customers receiving Low
Carbon Gas Service may not receive actual Low Carbon Gas at their Premises
but may instead be contributing to the cost for FortisBC Energy to deliver ar amount of Low Carbon Gas proportionate to the Customer's Gas usage into the
FortisBC Energy System.

28.2 Low Carbon Gas Physical Delivery

Customers located in the vicinity of Low Carbon Gas generation facilities may receive Low Carbon Gas as a component of Gas in such proportion as FortisBC Energy determines in its sole discretion.