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November 3, 2022

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

Attention: Ms. Sara Hardgrave, Acting Commission Secretary

Dear Ms. Hardgrave:

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

**Revised Renewable Gas Program Application – Stage 2 (Application)**

**Response to the City of Richmond, the City of Surrey, the District of North Vancouver, the District of Saanich, the City of Victoria and Lulu Island Energy Company Ltd. (CoR) In Scope Information Request (IR) No. 2 – Questions 19.1, 19.3, 19.5, 19.7 and 19.8**

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In accordance with the British Columbia Utilities Commission (BCUC) Order G-293-22, FEI respectfully submits the attached responses to CoR IR2 19.1, 19.3, 19.5, 19.7 and 19.8 determined to be in scope.

If further information is required, please contact the undersigned.

Sincerely,

**FORTISBC ENERGY INC.**

***Original signed:***

Diane Roy

cc (email only): Registered Interveners



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1 **19.0 Reference: ACCOUNTING TREATMENT, PROGRAM MECHANICS, RATE**  
 2 **SETTING AND CUSTOMER BILL IMPACTS**  
 3 **Exhibit B-17, Section G, BCUC IR1 42.3 and 42.4, pp. 210-211**  
 4 **Customer Bill Impacts – Customer Bill Impacts under the CleanBC**  
 5 **Roadmap’s Emissions Cap**

6 In response to BCUC IR1 12.3.2, FEI provided estimated customer bills assuming the  
 7 Renewable Gas Connections program is not approved, and renewable gas purchases  
 8 grow to 30 PJ by 2030.

9 In response to BCUC IR1 41.5, FEI provided estimated customer bills assuming the  
 10 Renewable Gas Connections program is approved, and renewable gas purchases grow  
 11 to 30 PJ by 2030.

12 In response to BCUC IR1 42.2, FEI provided estimated customer bills assuming the  
 13 Renewable Gas Connections program is approved, and renewable gas purchases grow  
 14 to 55 PJ by 2030.

15 19.1 Assuming that the Renewable Gas Connections portion of the Application is not  
 16 approved, but the other elements of FEI’s proposal are approved, please fill out  
 17 the following table, showing how FEI would meet its 2030 GHG emissions cap.  
 18 Please convert and adjust units as needed.

Line		Amount	Note
1	2020 Throughput (PJ)	235	
2	Load Loss by 2030 due to Building Energy Efficiency (PJ)		
3	Load Loss by 2030 due to Industrial Energy Efficiency (PJ)		
4	Load Loss by 2030 due to Building Electrification (PJ)		
5	Load Loss by 2030 due to Industrial Electrification (PJ)		
6	Other Load Changes by 2030 (PJ)		
7	2030 Throughput (PJ)		
8	2030 FEI GHG Emissions Cap (MT)		
9	Customer-side emissions reductions (e.g. CCS) (MT)		
10	2030 FEI Allowable Emissions (MT)		
11	FEI Allowable GHG Intensity (MT / PJ)		Line 10 / Line 7
12	FEI Conventional Gas Purchases (PJ)		
13	Conventional Gas GHG Intensity (MT / PJ)		
14	Conventional Gas GHG Emissions (MT)		



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15	FEI Renewable Gas Purchases (PJ)		
16	FEI Renewable Gas GHG Intensity (MT / PJ)		
17	FEI Renewable Gas GHG Emissions (MT)		
18	Total GHG Emissions (MT)		Equal to Line 10

1

2 **Response:**

3 As the CleanBC Roadmap to 2030 does not indicate an interim GHG cap for 2028, FEI has  
4 provided the following analysis out to 2030, assuming that the Renewable Gas Connections  
5 service is not approved.

6 The provincial government has set out in the CleanBC Roadmap to 2030 a cap of 6.11 Mt of  
7 CO<sub>2</sub>e requiring utilities delivering natural gas in BC to reduce their GHG emissions by 5.5 Mt of  
8 CO<sub>2</sub>e. While this policy has not yet been legislated, and FEI does not know the timeline for  
9 legislative changes, for the purposes of this response FEI has assumed that FEI will reduce its  
10 emissions to meet its portion of the cap by 2030. FEI's proportion of the provincial cap is  
11 approximately 5.8 Mt CO<sub>2</sub>e. FEI has used the latest GHG reduction pathways information from  
12 its 2022 Long Term Gas Resource Plan (LTGRP) to generate the table below to illustrate the  
13 pathway that FEI generally expects to use to reach the GHG reductions required to meet the cap  
14 set out in CleanBC.

15 However, it is important to note that the volumes of energy delivered by FEI and the reductions  
16 to meet the reduction in GHGs are expected to vary greatly from what is assumed in this IR  
17 response, as the emission cap has not been set out by legislation, and final targets, mechanisms  
18 for meeting the target, and actual customer groups (such as sales service, transportation service  
19 and bypass and special rates customers) that will be affected by the legislation have not been  
20 determined. Once legislation is enacted, and there are clear rules that FEI must adhere to, FEI  
21 would undertake studies and actions to meet the cap. This will be an iterative process that  
22 changes regularly as FEI has success or failure in reducing emissions by various actions.

23 Line 1 in Table 1 below showing 232.4 PJ is reflective of FEI's 2020 normalized throughput for all  
24 customers, including Sales Service, Transport Service and Bypass Special Rates customers, but  
25 does not include the throughput for natural gas used in the transportation market (vehicles and  
26 marine) as that throughput is not included within the CleanBC Cap for buildings and industry.  
27 Alongside the 232.4 PJ is the associated GHG emissions of 11.6 mega-tonnes (MT), assuming  
28 that FEI's throughput of 232.4 PJ has a carbon intensity of 0.05 MT/PJ.

29 For the purpose of this response, FEI assumes that, if the Renewable Gas Connections is not  
30 approved, its customer base will shrink in line with provincial building stock turnover of  
31 approximately 2 percent per year. In short, as building stock turns over, FEI has assumed that  
32 the new building will not have a gas connection. The final PJ throughput on line 10 of Table 1  
33 reflects this assumption.

34 Lines 2 through 9 of Table 1 reflect the GHG reduction pathways from the 2022 LTGRP. FEI  
35 assumes that 86.2 PJ of conventional natural gas will be shed reducing GHG emissions by 4.3

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1 MT. The analysis assumes that some of the shed demand will be replaced by 32.2 PJ of  
 2 Renewable Natural Gas with zero GHG emissions, 20 PJ of hydrogen with zero GHG emissions,  
 3 6.7 PJ of syngas and lignin with zero GHG emissions, and carbon capture and storage (CCS) will  
 4 be applied to 1.3 PJ of conventional natural gas reducing its emissions to below 0.0 MT (rounded).  
 5 In addition to the shed demand, and replacement with renewable energies and CCS, FEI also  
 6 assumes that demand side management (DSM) will reduce demand by 18.2 PJ, reducing GHG  
 7 emissions by 0.9 MT, and that natural efficiencies gains due to appliance technology and fuel  
 8 switching to electrification further reduce demand by 7.3 PJ and reduce GHG emissions by 0.4  
 9 MT. Lastly, FEI will need to undertake other measures to reduce GHG emissions by  
 10 approximately 0.3 MT to arrive at the CleanBC cap. The other measures are not yet defined and,  
 11 as described in the response to BCH IR2 2.6, FEI expects to take the steps necessary so that its  
 12 total GHG emissions from the use of natural gas by residential, commercial and industrial  
 13 customers will meet the 2030 GHG emissions cap expected to be implemented by the Province.

14 **Table 1: FEI's Presumed Pathway to Meet CleanBC GHG Cap Assuming Renewable Gas**  
 15 **Connections is not Approved**

Line No.	Particulars	GHG	PJ	CI (MT/PJ)	Reference
1	FEI's share of Provincial GHG Inventory	11.6	232.4	0.050	
2	Reduction in Conventional Natural Gas	(4.3)	(86.2)	0.049	
3	Renewable Natural Gas	0.0	32.2	0.000	
4	Hydrogen	-	20.0	-	
5	Syngas & Lignin	-	6.7	-	
6	Carbon Capture and Storage	0.0	1.3	0.015	
7	Demand Side Measures	(0.9)	(18.2)	0.050	
8	Natural Efficiency Gains & Electrification	(0.4)	(7.3)	0.050	
9	Other Measures	(0.3)			
10	<b>Estimated 2030</b>	<b>5.8</b>	<b>180.9</b>		Sum of Lines 1 through 9
11					
12	Change in throughput applied to bill impact model		(51.5)		Line 10 - Line 1

17 FEI's bill impact modeling has a different throughput as a starting point, as FEI excluded bypass  
 18 and special rates customers from its analysis because these customers have tariff supplements  
 19 or transportation contracts that include BCUC approved rates and volumes and FEI is not certain  
 20 if and how the cap will affect these customers. Therefore, for consistency with the Application and  
 21 prior IR responses, FEI has continued to exclude these customers from the bill impact analysis  
 22 and has reduced the throughput in its analysis by 51.5 PJ as set out on line 12 of Table 1 above.

23 To align the bill impact analysis with Table 1 above, FEI has made the following adjustments and  
 24 assumptions:

- 25 • FEI aligned the acquisition of Renewable Natural Gas, Hydrogen, Syngas and Lignin  
 26 supply to those in Table 1;



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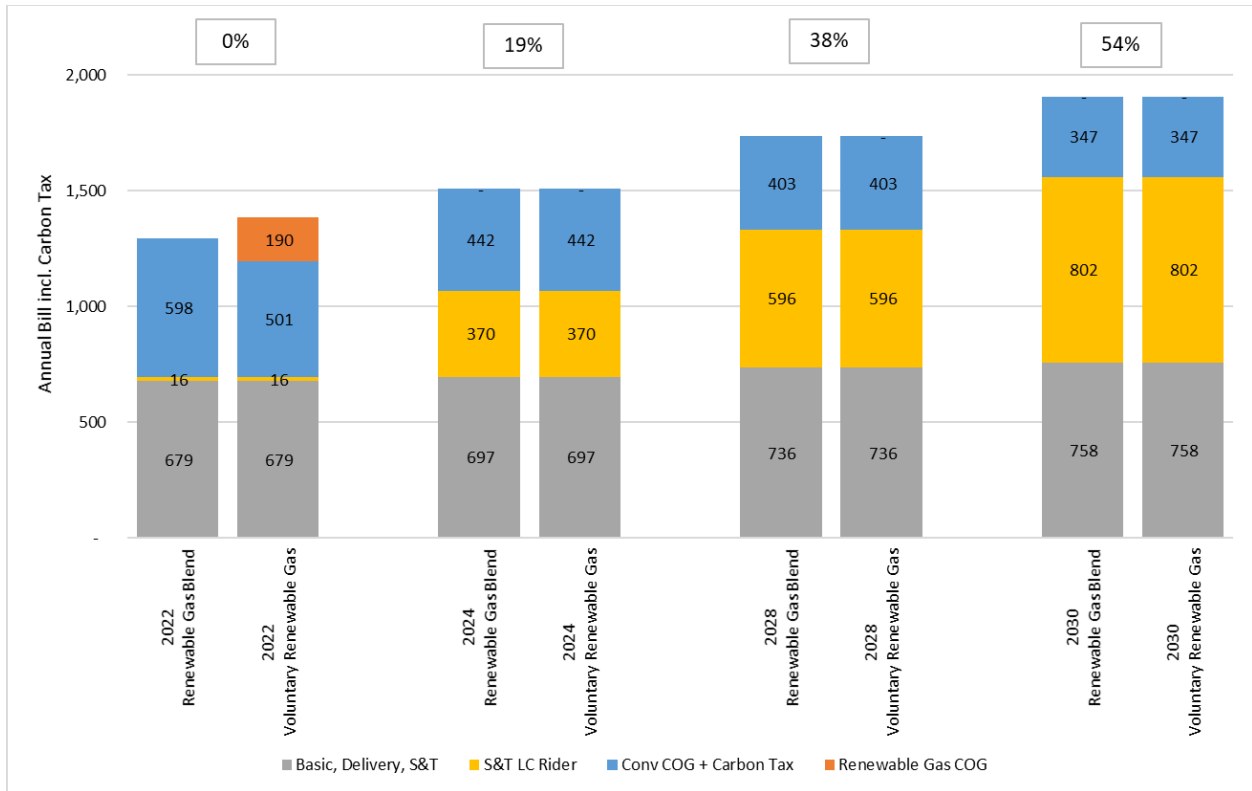
- 1       • FEI assumed that provincial building stock turnover is 2 percent per year, resulting in FEI  
2       losing 2 percent of its residential and commercial customers per year which decreases  
3       demand;
- 4       • As requested in this question, FEI has assumed that the Renewable Gas Connections  
5       proposals in this Application have not been approved so has eliminated the demand for  
6       Renewable Gas Connections customers, thereby increasing the Renewable Gas that  
7       would flow through the proposed Renewable Gas Blend service;
- 8       • FEI adjusted its customer UPC to reflect a reduction in throughput from DSM activities,  
9       natural efficiency gains and electrification;
- 10      • FEI's delivery margin required<sup>1</sup> from all customers in a rate schedule is held constant and  
11      is spread over less customers and less volume, resulting in delivery rate increases; and
- 12      • Carbon tax increases to \$170 per tonne by 2030 (\$8.40 per GJ) and remains at that level  
13      to 2050.
- 14      Please note that, in the Application, the Basic, Delivery, Storage & Transport and Cost of Gas  
15      charges do not include inflation so are in real dollars. The forecast of Renewable Gas supply  
16      costs is without consideration for inflation so is in real dollars. FEI has discounted carbon tax per  
17      GJ, which is included in the Application as nominal dollars, by 2 percent per year so that the  
18      nominal value is reflected to in real 2022 dollars.
- 19      Below, FEI has included the requested analysis as revised Figures 8-4, 8-5 and 8-6 which align  
20      to the assumptions and analysis discussed above.

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<sup>1</sup> In response to BCUC IR2 55.1.1 FEI acknowledged that if Renewable Gas Connections was not approved that it may be possible, all else equal, to reduce O&M costs 2.5 percent to 3.5 percent by 2030 thereby reducing delivery margin by the same amount. However, FEI has not made this adjustment to the bill impacts model for consistency with the Application and responses to prior IRs.

1

**Requested Figure 8-4: Annual Bill for Rate Schedule 1 in Real 2022 Dollars**

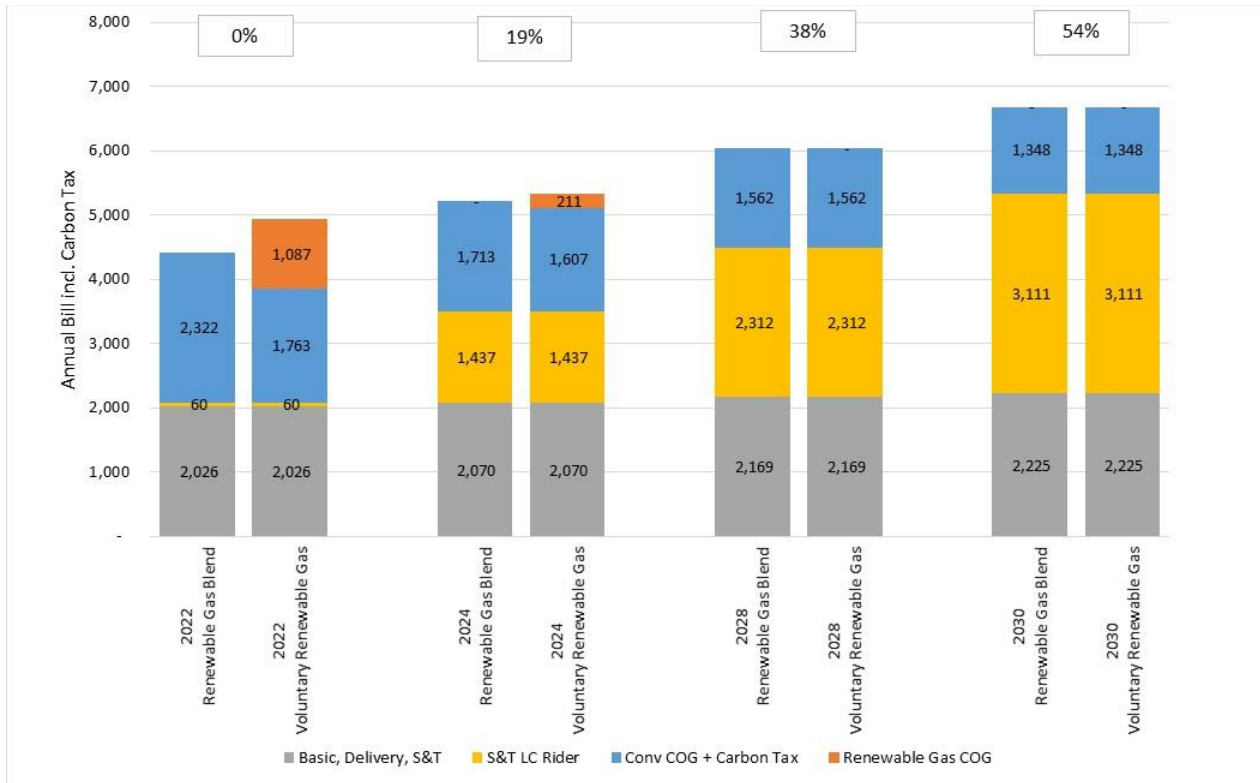


2

3 Without the Renewable Gas Connections service and the consequent loss of the new construction  
 4 sector, and assuming FEI takes the measures to meet the Province’s GHG cap as set out in Table  
 5 1 to this response, the annual bill for an RS 1 customer in 2030 will equal \$1,907 in real 2022  
 6 dollars which is 14 percent higher than the 2030 annual bill as calculated in response to CoR IR2  
 7 19.5, which assumes FEI’s Renewable Gas Connections proposal is approved as filed.

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**Revised Figure 8-5: Annual Bill for Rate Schedule 2 in Real 2022 Dollars**

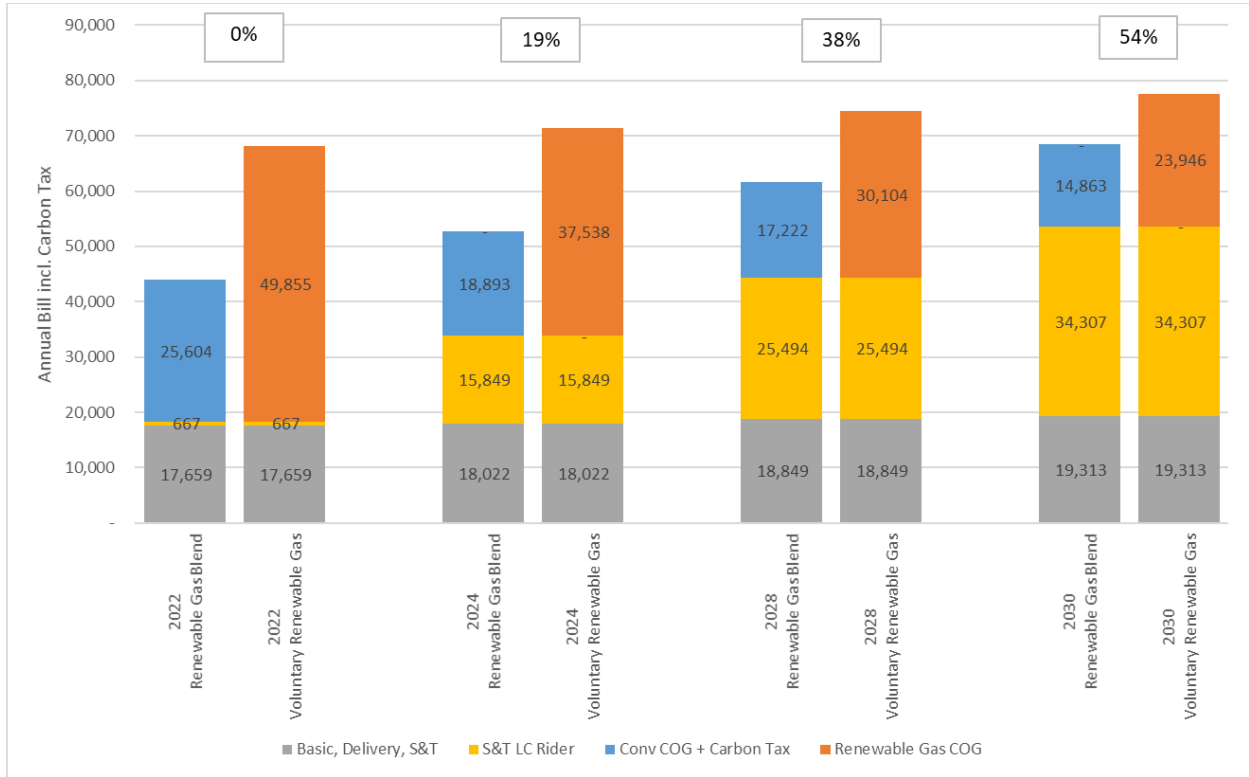


2

3 Without the Renewable Gas Connections service and consequent the loss of the new construction  
 4 sector, and assuming FEI takes the measures to meet the Province’s GHG cap as set out in Table  
 5 1 to this response, the annual bill for an RS 2 customer in 2030 will equal \$6,683 in real 2022  
 6 dollars which is 13 percent higher than the 2030 annual bill as calculated in response to CoR IR2  
 7 19.5, which assumes FEI’s Renewable Gas Connections proposal is approved as filed.

1

**Revised Figure 8-6: Annual Bill for Rate Schedule 3 in Real 2022 Dollars**



2

3 Without the Renewable Gas Connections service and consequent loss of the new construction  
 4 sector, and assuming FEI takes the measures to meet the Province’s GHG cap as set out in Table  
 5 1 to this response, the annual bill for an RS 3 customer in 2030 will equal \$68,483 in real 2022  
 6 dollars which is 12 percent higher than the 2030 annual bill as calculated in response to CoR IR2  
 7 19.5, which assumes FEI’s Renewable Gas Connections proposal is approved as filed.

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19.3 Please provide an updated version of the charts shown in response to BCUC IR1  
 12 12.3.2, as well as the supporting spreadsheet, corresponding to the scenario  
 13 depicted in the response to CoR IR2 19.1 above. Please provide the response in  
 14 real 2022\$ to align with other information provided by FEI in IR2 (such as the  
 15 response to BCUC IR2 46.1).

16

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**Response:**

18

Please refer to the response to CoR IR2 19.1.

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1  
2       19.5   Assuming all portions of the current application (including the Renewable Gas  
3            Connections service) are approved, please fill out the following table, showing how  
4            FEI would meet its 2030 GHG emissions cap. Please convert and adjust units as  
5            needed.

Line		Amount	Note
1	2020 Throughput (PJ)	235	
2	Load Loss by 2030 due to Building Energy Efficiency (PJ)		
3	Load Loss by 2030 due to Industrial Energy Efficiency (PJ)		
4	Load Loss by 2030 due to Building Electrification (PJ)		
5	Load Loss by 2030 due to Industrial Electrification (PJ)		
6	Other Load Changes by 2030 (PJ)		
7	2030 Throughput (PJ)		
8	2030 FEI GHG Emissions Cap (MT)		
9	Customer-side emissions reductions (e.g. CCS) (MT)		
10	2030 FEI Allowable Emissions (MT)		
11	FEI Allowable GHG Intensity (MT / PJ)		Line 10 / Line 7
12	FEI Conventional Gas Purchases (PJ)		
13	Conventional Gas GHG Intensity (MT / PJ)		
14	Conventional Gas GHG Emissions (MT)		
15	FEI Renewable Gas Purchases (PJ)		
16	FEI Renewable Gas GHG Intensity (MT / PJ)		
17	FEI Renewable Gas GHG Emissions (MT)		
18	Total GHG Emissions (MT)		Equal to Line 10

6  
7       **Response:**

8       As there is no 2028 interim GHG cap in the CleanBC Roadmap to 2030, FEI has provided the  
9       following analysis out to 2030 assuming at FEI's Application is approved, including the Renewable  
10       Gas Connections service. Also, as noted in the response to CoR IR2 19.1, the volumes of energy  
11       delivered by FEI and the reductions to meet the reduction in GHGs are expected to vary greatly  
12       from what is assumed in this IR response, as the emission cap has not been set out by legislation,  
13       and final targets, mechanisms for meeting the target, and actual customer groups (such as sales  
14       service, transportation service and bypass and special rates customers) that will be affected by  
15       the legislation have not been determined.

16       As with the response to CoR IR2 19.1, FEI has used the latest GHG reduction pathways  
17       information from its 2022 LTGRP to generate the table below to illustrate the pathway that FEI

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1 generally expects to use to reach the GHG reductions required to meet the cap set out in  
 2 CleanBC.

3 As discussed in the response to CoR IR2 19.1, line 1 in Table 1 below shows 232.4 PJ which is  
 4 reflective of FEI's 2020 normalized throughput for all customers, including Sales Service,  
 5 Transport Service and Bypass Special Rates customers, but excludes the throughput for natural  
 6 gas used in the transportation market.

7 FEI assumes that, if the Renewable Gas Connections service is approved, that its customer count  
 8 will increase over time. Accordingly, FEI has used the residential and commercial customer count  
 9 data from the Diversified Energy Future (Planning) scenario from its 2022 LTGRP which assumes  
 10 that FEI will continue to be able to add customers in the (new) buildings sector..

11 Lines 2 through 9 of Table 1 reflect the GHG reduction pathways from its LTGRP. FEI assumes  
 12 that 60.2 PJ of conventional natural gas will be shed reducing GHG emissions by 3.0 MT. The  
 13 analysis assumes that all of the shed demand will be replaced by 32.2 PJ of Renewable Natural  
 14 Gas with zero GHG emissions, 20 PJ of hydrogen with zero GHG emissions, 6.7 PJ of syngas  
 15 and lignin with zero GHG emissions, carbon capture and storage (CCS) will be applied to 1.3 PJ  
 16 of conventional natural gas reducing its GHG emissions to below 0.0 MT. In addition to the shed  
 17 demand, replacement with renewable energies and CCS, FEI also assumes that DSM will reduce  
 18 demand by 18.2 PJ, reducing GHG emissions by 0.9 MT, and that natural efficiencies gains due  
 19 to appliance technology and fuel switching to electrification will further reduce demand by 7.3 PJ  
 20 and reduce GHG emissions by 0.4 MT. Lastly, FEI will need to undertake other measures to  
 21 reduce GHG emissions by approximately 1.5 MT to arrive at the CleanBC cap. The other  
 22 measures are not yet defined. As described in response to BCH IR2 2.6, FEI expects to take the  
 23 steps necessary so that its total GHG emissions from the use of natural gas by residential,  
 24 commercial and industrial customers will meet the 2030 GHG emissions cap expected to be  
 25 implemented by the Province.

26 **Table 1: FEI's Presumed Pathway to Meet CleanBC GHG Cap Assuming Renewable Gas**  
 27 **Connections is Approved**

Line No.	Particulars	GHG	PJ	CI (MT/PJ)	Reference
1	FEI's share of Provincial GHG Inventory	11.6	232.4	0.050	
2	Reduction in Conventional Natural Gas	(3.0)	(60.2)	0.049	
3	Renewable Natural Gas	0.0	32.2	0.000	
4	Hydrogen	-	20.0	-	
5	Syngas & Lignin	-	6.7	-	
6	Carbon Capture and Storage	0.0	1.3	0.015	
7	Demand Side Measures	(0.9)	(18.2)	0.050	
8	Natural Efficiency Gains & Electrification	(0.4)	(7.3)	0.050	
9	Other Measures	(1.5)			
10	<b>Estimated 2030</b>	<b>5.8</b>	<b>206.9</b>		Sum of Lines 1 through 9
11					
12	Change in throughput applied to bill impact model		(25.5)		Line 10 - Line 1



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1 As discussed in FEI’s response to CoR IR2 19.1, the bill impact modeling has a different  
2 throughput as a starting point, so FEI has reduced the throughput in its analysis by 25.5 PJ as set  
3 out on line 12 of Table 1 above.

4 To align the bill impact analysis with Table 1 above, FEI has made the following adjustments and  
5 assumptions:

- 6 • FEI aligned the acquisition of Renewable Natural Gas, Hydrogen, Syngas and Lignin  
7 supply to those in Table 1;
- 8 • FEI assumed that customer count increases over time in line with forecasts included in  
9 the 2022 LTGRP;
- 10 • FEI adjusted its customer UPC to reflect a reduction in throughput from DSM activities,  
11 natural efficiency gains and electrification;
- 12 • FEI’s delivery margin required<sup>2</sup> from all customers in a rate schedule is held constant and  
13 is spread over more customers but less total volume<sup>3</sup>, resulting in delivery rate increases;  
14 and
- 15 • Carbon tax increases to \$170 per tonne by 2030 (\$8.40 per GJ) and remains at that level  
16 to 2050.

17 Please note that, in the Application, the Basic, Delivery, Storage & Transport and Cost of Gas  
18 charges do not include inflation so are in real dollars. The forecast of Renewable Gas supply  
19 costs is without consideration for inflation so is in real dollars. FEI has discounted carbon tax per  
20 GJ, which is included in the Application as nominal dollars, by 2 percent per year so that the  
21 nominal value is reflected to in real 2022 dollars.

22 Below, FEI has included the requested analysis as revised Figures 8-4, 8-5 and 8-6 which align  
23 to the assumptions and analysis discussed above.

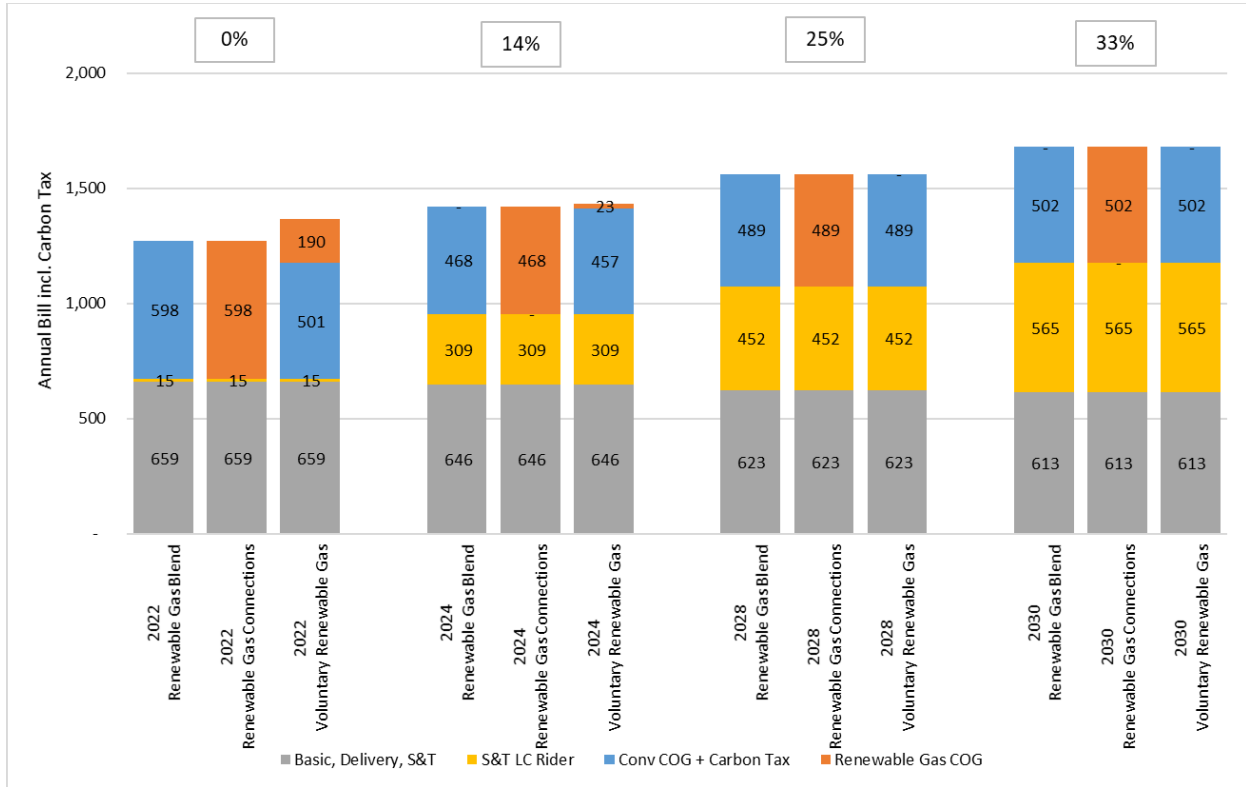
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<sup>2</sup> In response to BCUC IR2 55.1.1 FEI acknowledged that if Renewable Gas Connections was not approved that it may be possible, all else equal, to reduce O&M costs 2.5 percent to 3.5 percent by 2030 thereby reducing delivery margin by the same amount. However, FEI has not made this adjustment to the bill impacts model for consistency with the Application and responses to prior IRs.

<sup>3</sup> Even with customer counts increasing total throughput decreases over time as use per customer drops to account for DSM, natural efficiency and electrification outcomes.

1

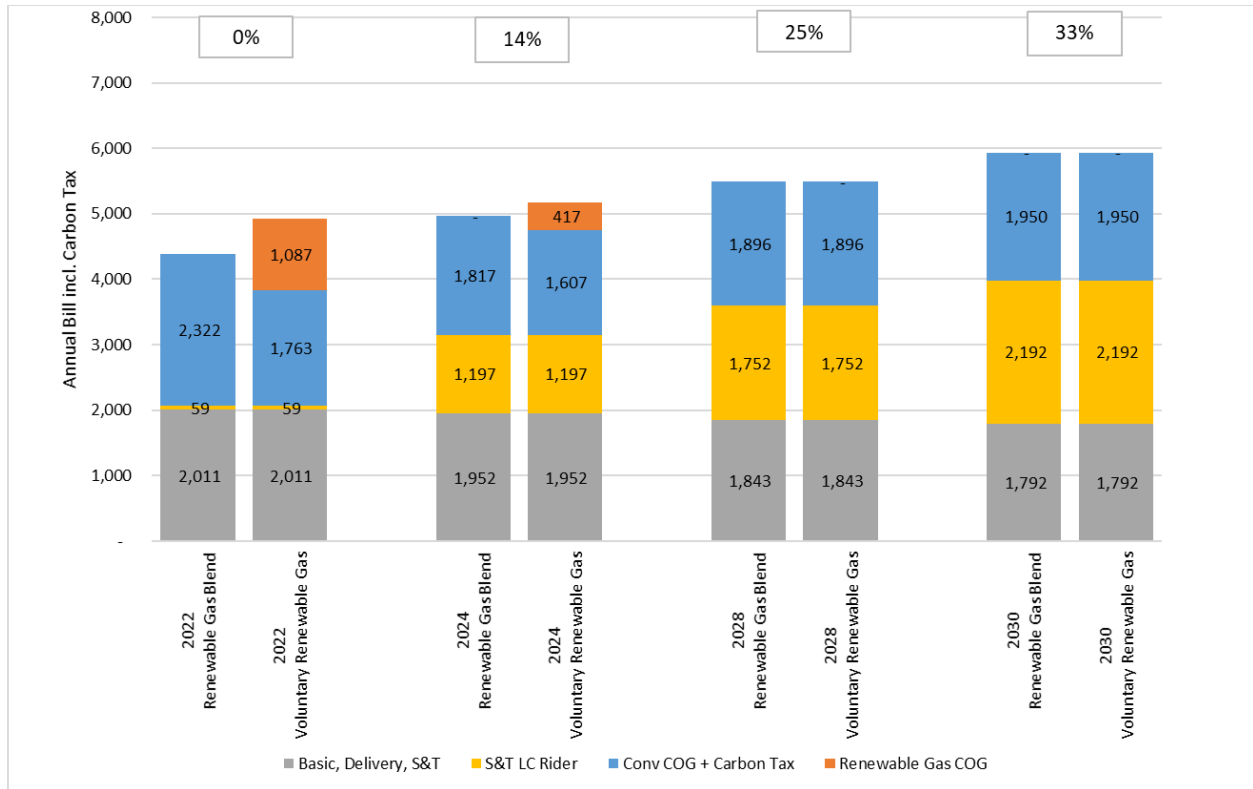
**Requested Figure 8-4: Annual Bill for Rate Schedule 1 in Real 2022 Dollars**



2

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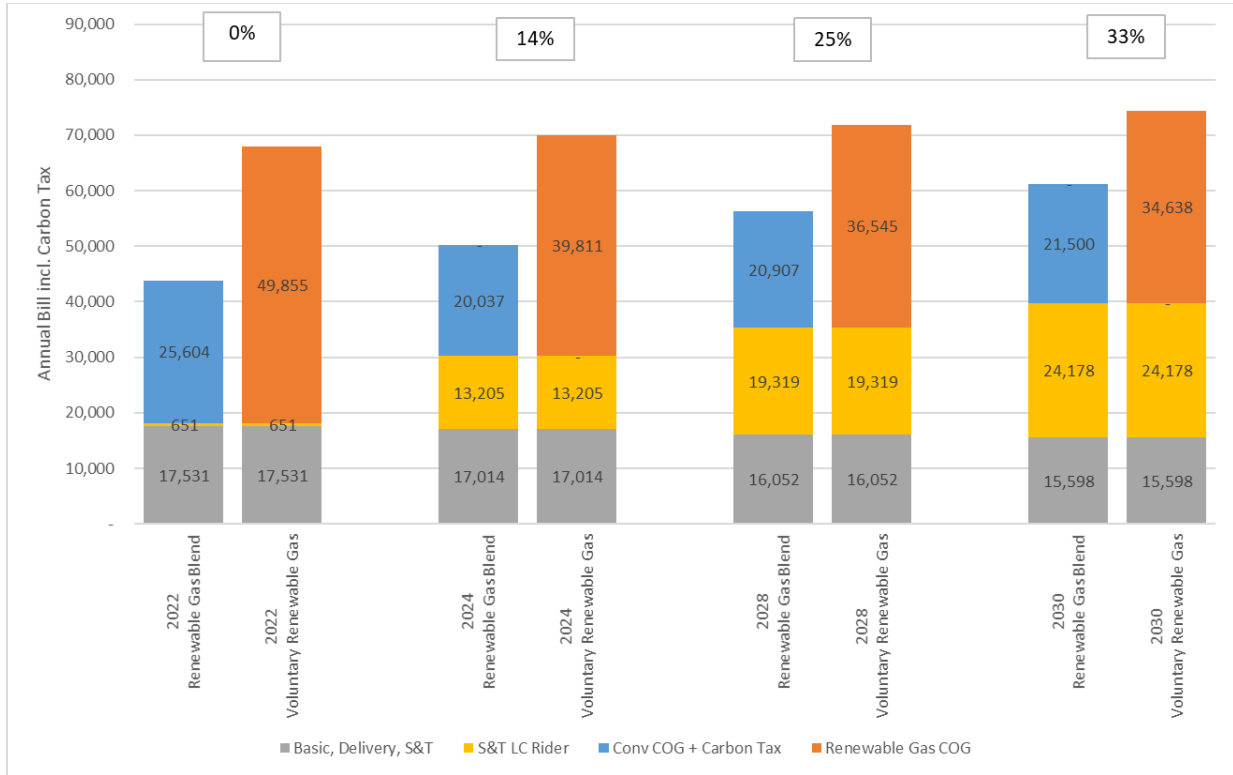
**Requested Figure 8-5: Annual Bill for Rate Schedule 2 in Real 2022 Dollars**



2

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**Requested Figure 8-6: Annual Bill for Rate Schedule 3 in Real 2022 Dollars**



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19.7 Please provide an updated version of the charts shown in response to BCUC IR1 12.3.2, as well as the supporting spreadsheet, corresponding to the scenario depicted in the response to CoR IR2 19.5 above. Please provide the response in real 2022\$ to align with other information provided in IR2 (such as the response to BCUC IR2 46.1).

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**Response:**

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Please refer to the response to CoR IR2 19.5.

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19.8 CoR IR1 1.3 asked FEI to provide a series of tables for 2024, 2028 and 2032. Please provide a single updated version of the table requested in CoR IR1 1.3, for 2030, based on the 2030 renewable gas volume identified in the response to CoR



1 IR2 19.5 above. Please provide the response in real 2022\$ to align with other  
 2 information provided in IR2 (such as the response to BCUC IR2 46.1).  
 3

4 **Response:**

5 As the CleanBC Roadmap to 2030 does not specify an interim 2028 GHG cap, FEI has provided  
 6 the following response out to 2030.

7 FEI has provided the following table based on the analysis undertaken in response to CoR IR2  
 8 19.5 as requested.

9 **Requested Table 1: Renewable Gas Demand and Cost Recovery Year 2030**

2030							
1		Renewable Gas Connections	Voluntary Renewable Gas (Ex NGV and T-Service)	Voluntary Renewable Gas (NGV)	Voluntary Renewable Gas (T-Service)	Renewable Gas Blend	Total
	RG Volume (TJ)						
	Delivered via LCG Charges (TJ)	11,785	3,378	2,172	275	-	17,610
	Delivered via S&T LC Rider (TJ)	3,928	1,126	-	-	37,536	42,590
2	Total Volume (TJ)	15,713	4,504	2,172	275	37,536	60,200
3	Weighted Average Supply Cost of Renewable Gas \$/GJ	22.42	22.42	22.42	22.42	22.42	
4	Renewable Gas Cost by Customer Group [Line 2 x Line 3] \$000s	352,223	100,964	48,678	6,164	841,398	1,349,428
	Cost Recovery (\$000)						
	Cost Recovery via LCG Charges (\$000)	134,993	62,348	48,678	6,164	-	252,183
	Cost recovery via S&T LC Rider (\$000)	101,205	29,010	-	-	967,030	1,097,244
5	Total Cost Recovery (\$000)	236,198	91,358	48,678	6,164	967,030	1,349,428
6	Over recovery under recovery) [Line 5 - Line 4] \$000s	(116,025)	(9,606)	-	-	125,632	-
7	Customer Group Contribution per GJ Renewable Gas Allocated to Customer Group [Line 5 / Line 2] \$/GJ	15.03	20.28	22.42	22.42	25.76	22.42

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