



Diane Roy
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January 16, 2023

City of Victoria
1 Centennial Square
Victoria, B.C
V8W 1P6

Attention: Ms. Carrie Moffatt, Assistant City Solicitor

Dear Ms. Moffatt:

**Re: FortisBC Energy Inc. (FEI)
Revised Renewable Gas Program Application – Stage 2 (Application)
FEI Information Request (IR) No. 1 to the City of Victoria**

On December 17, 2021, FEI filed the Application referenced above. In accordance with the amended regulatory timetable established in British Columbia Utilities Commission Order G-165-22A for the review of the Application, FEI respectfully submits the attached FEI IR No. 1 to City of Victoria on Intervener Evidence.

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) FEI Revised Renewable Gas Program Application – Stage 2 (Application)	Submission Date: January 16, 2023
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1 **TOPIC: ELECTRIFICATION**

2 **1.0 Reference: Exhibit C9-3, City of Victoria Intervener Evidence, Pages 2-3**

3 On pages 2-3 of her evidence, Ms. Berndt states:

4 The City of Victoria has direction from council to require new buildings to implement
5 the forthcoming carbon pollution standards once the standards are added to the BC
6 Building Code by the province, expected this December, 2022 ¹. This bylaw will
7 require that all Part 9 residential buildings meet the proposed low carbon standard
8 as of July 1, 2023, and zero carbon as of January 1, 2025. Additionally, all Part 3
9 buildings that are covered by the carbon pollution standards will have to meet low
10 carbon thresholds as of July 1, 2024, and zero carbon by July 1, 2025. The final
11 version of the carbon pollution standards has yet to be released by the province,
12 and so it remains uncertain whether RNG will be an eligible pathway for compliance
13 within this new standard.

14 In developing these regulations, the City has worked in collaboration with
15 neighbouring municipalities including the District of Saanich to conduct industry
16 engagement and technical analysis. The industry engagement and technical
17 analysis concluded that the building and development industry is technically
18 capable of meeting both the low carbon and zero carbon ready standards today
19 through electrification for minimal incremental cost.

20 1.1 Please identify what costs are included in the “minimal incremental cost”. In
21 particular, please confirm whether Ms. Berndt’s reference to “minimal incremental
22 cost” includes the construction of incremental clean electricity production,
23 transmission and distribution to meet increased load requirements due to
24 electrification?

25 1.2 Please provide the technical analysis referenced in the preamble.

26

¹ Council minutes adopting this direction August 4, 2022:
<https://pubvictoria.escribemeetings.com/FileStream.ashx?DocumentId=85014>
(pg 3-4) and staff report, July 21, 2022 is attached at Appendix B to this report or access online at:
<https://pubvictoria.escribemeetings.com/filestream.ashx?DocumentId=82578>.