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April 18, 2023

British Columbia Utilities Commission
Suite 410, 900 Howe Street
Vancouver, B.C.
V6Z 2N3

Attention: Patrick Wruck, Commission Secretary

Dear Patrick Wruck:

**Re: FortisBC Energy Inc. (FEI)
Revised Renewable Gas Program Application – Stage 2 (Application)
Response to the British Columbia Utilities Commission (BCUC) Information
Request (IR) No. 1 on FEI’s Rebuttal Evidence to BrightSide Solutions Inc.
(BrightSide)**

On December 17, 2021, FEI filed the Application referenced above. In accordance with the amended regulatory timetable established in Exhibit A-47, FEI respectfully submits the attached response to BCUC IR1 on FEI’s Rebuttal Evidence to BrightSide.

If further information is required, please contact the undersigned.

Sincerely,

FORTISBC ENERGY INC.

Original signed:

Sarah Walsh

Attachments

cc (email only): Registered Parties

Table 6-1: Contracted RNG Supply Projects

	1	2	3	4	5	6	7	8	9
	Project	Type	Province/State	BCUC Approval Status	Start/Anticipated Start Date (Month-Year)	Contract Max Annual Volume (Tj/Yr)	Proportion of Total Max Contract Volume (%)	Expected Annual Volume (Tj/Yr)	Proportion of Total Expected Volume (%)
Existing	Fraser Valley Biogas	Farm Digester	BC	Approved	Sep-10	91	0.7%	67	0.7%
	Columbia Shuswap Regional Dist.	Landfill	BC	Approved	Jan-13	40	0.3%	16	0.2%
	Kelowna Landfill	Landfill	BC	Approved	Jun-14	118	0.9%	62	0.6%
	Seabreeze Farms	Farm Digester	BC	Approved	Feb-15	120	0.9%	90	0.9%
	City of Surrey	Organics Processing	BC	Approved	Jul-18	160	1.2%	75	0.8%
	Tidal Stormfisher	Organics Processing	ON	Approved	Aug-20	237	1.7%	180	1.8%
	Lulu Island Waste Water	Waste Water	BC	Approved	Jun-21	100	0.7%	40	0.4%
	Lethbridge Biogas	Farm Digester	AB	Approved	Aug-21	475	3.5%	225	2.3%
	Shell Energy	Waste Water	IA	Approved	Aug-21	692	5.1%	519	5.3%
	Faromor CNG	Farm Digester	ON	Approved	Oct-21	120	0.9%	60	0.6%
	Total Existing (Tj/Yr)						2,153	15.9%	1,334
Anticipated	Assai Energy	Landfill	PA	Approved	Jan-22	1,600	11.8%	1,200	12.3%
	Dicklands Farm	Farm Digester	BC	Approved	Jul-22	160	1.2%	100	1.0%
	Walker RNG	Farm Digester	ON	Approved	Jul-22	160	1.2%	120	1.2%
	Tidal Niagara	Landfill	ON	Approved	Aug-22	694	5.1%	675	6.9%
	Net Zero Waste	Organics Processing	BC	Approved	Oct-22	173	1.3%	130	1.3%
	GrowTEC	Farm Digester	AB	Approved	Oct-22	140	1.0%	80	0.8%
	Evergreen (Oshawa) Environmental	Organics Processing	ON	Approved	Oct-22	390	2.9%	300	3.1%
	City of Vancouver	Landfill	BC	Approved	Nov-23	298	2.2%	250	2.6%
	Matter	Farm Digester	BC	Approved	Jul-23	100	0.7%	75	0.8%
	Tidal GSE	Hydrogen Reduction	ON	Approved	Sep-23	800	5.9%	600	6.1%
	Delta RNG	Landfill	BC	In Progress	Jan-23	1,200	8.8%	740	7.5%
	EPCOR	Waste Water Treatment	AB	Approved	Mar-23	280	2.1%	210	2.1%
	RDFFG	Landfill	BC	In Progress	Mar-23	94	0.7%	80	0.8%
	Tidal Rockford	Landfill	IL	Approved	Jun-23	841	6.2%	486	5.0%
	Bradam Hamilton	Carbon Energy	ON	Approved	Jul-23	1,500	11.1%	1,125	11.5%
	Capital Regional District	Landfill	BC	Approved	Sep-23	280	2.1%	238	2.4%
	Bradam Nananee	Carbon Energy Recovery	ON	Approved	Oct-23	1,500	11.1%	1,125	11.5%
REN Energy	Wood Biomass	BC	Approved	Dec-23	1,200	8.8%	900	9.2%	
Total Anticipated (Tj/Yr)						11,410	84.1%	8,434	86.3%
Grand Total Volume (Tj/Yr)						13,563	100.0%	9,768	100.0%

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1.1 Considering EMLI will only accept RNG that is either “manufactured in or physically delivered to BC to generate credits,” please explain how much of FEI’s existing and anticipated RNG supply projects will meet the EMLI’s criteria of being sourced within BC, and include a breakdown between:

3

4

5

- a) Fuels manufactured in BC
- b) Fuels physically delivered to BC

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Response:

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FEI expects that all RNG supply from BC will be eligible for a fuel code under EMLI’s current interpretation of the BC-LCFS, as a fuel manufactured in BC.

9

Given that there is a direct connection and a physical flow of gas from Alberta to the BC natural gas network, EMLI has indicated that they would consider RNG projects from Alberta as potentially eligible for an approved fuel code, if FEI is able to demonstrate that those projects could physically deliver RNG from Alberta to BC.

10

As of March 2023, the BCUC has accepted biomethane purchase agreements totaling an expected annual volume of approximately 19 PJ. Table 6-1 of the Application, as reproduced in

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1 the preamble, has a different total as it was prepared in 2021. Of the 19 PJ of total RNG supply,
2 approximately 2.5 PJ per year is RNG supply located in BC and approximately 1.1 PJ of supply
3 is expected from Alberta.

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7 1.2 Considering EMLI does not accept out-of-province RNG supply for the purposes
8 of the LCFS, please explain whether this will have any implication on the same
9 out-of-province RNG supply being eligible to meet the CleanBC targets on
10 reducing carbon emissions in BC.

11

12 **Response:**

13 As EMLI's position on out-of-province RNG supply is specific to the *Greenhouse Gas Reductions*
14 *(Renewable and Low Carbon Fuel Requirements) Act*, EMLI's position should have no
15 implications for the eligibility of out-of-province RNG to meet the CleanBC targets on reducing
16 carbon emissions in BC. The proposed cap on GHG emissions required from all gas utilities in
17 BC by 2030 in the CleanBC Roadmap remains in development, including defining the eligible
18 compliance pathways, and is expected to be implemented through separate legislation.

19 FEI notes that the CleanBC Roadmap was issued after FEI began acquiring out-of-province RNG,
20 and that it specifically contemplates the acquisition of RNG and other renewable and low carbon
21 fuels as a means of meeting the cap (at page 29):

22 Utilities will determine how best to meet the target, which could include acquiring
23 more renewable gases as well as supporting greater energy efficiency. Measures
24 in CleanBC allow gas utilities to use renewables such as synthetic gas,
25 biomethane, green and waste hydrogen and lignin to achieve this.

26 FEI expects that EMLI's current position regarding out-of-province RNG supply for the purposes
27 of the BC-LCFS will negatively impact the Province's ability to meet the CleanBC targets in the
28 transportation sector, as RNG is contemplated as a key compliance pathway. If, hypothetically,
29 there were similar limits on the use of out-of-province RNG in BC's buildings and industry sectors,
30 FEI expects that the Province's ability to meet the CleanBC targets would also be negatively
31 impacted. FEI has seen no indication that similar limits on out-of-province RNG would apply
32 equally to these two sectors. In particular, FEI can still acquire out-of-province RNG supply as a
33 prescribed undertaking through the *Greenhouse Gas Reduction (Clean Energy) Regulation*
34 (GGRR), one of the key regulations enabling FEI and the Province to both reduce GHG emissions
35 and meet the CleanBC targets.

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1 1.3 Please explain if FEI has communicated or confirmed with the BC Government on
2 whether out-of-province RNG supply will be eligible to meet the CleanBC targets.

3 1.3.1 If there has been no communication or confirmation, please confirm and
4 explain whether FEI intends to clarify with the BC Government in the near
5 future.
6

7 **Response:**

8 FEI is engaging with the Province regarding multiple policies related to advancing low-carbon
9 solutions to meet the CleanBC GHG emissions reduction targets. In particular, FEI is working with
10 the Province to establish a registry to provide additional assurances regarding out-of-province
11 RNG and its environmental attributes (i.e., GHG emission reductions). FEI believes that a registry
12 of this kind will provide greater confidence to stakeholders regarding the use of out-of-province
13 supply to reduce GHG emissions.

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17 1.4 Considering EMLI does not accept out-of-province RNG supply for the purposes
18 of the LCFS, please explain whether this will have any implication on the existing
19 LCFS credits that FEI may have received or accrued prior to February 2023,
20 including the risk of claw backs.
21

22 **Response:**

23 EMLI's position on out-of-province RNG for the purposes of the BC-LCFS does not have any
24 impact on the BC-LCFS credits that FEI has already received or accrued. FEI's credit generation
25 under the BC-LCFS to date is solely based on fuel codes that EMLI has approved for conventional
26 CNG and LNG usage. Further, EMLI has not approved any out-of-province RNG fuel codes for
27 FEI under the BC-LCFS, so there have not been any credits generated under the BC-LCFS based
28 on out-of-province RNG supply. Therefore, there is no risk of claw backs.

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32 In Section 7.4.3.2 of the Application, FEI provides the following rationale for increasing the
33 price of RNG for Natural Gas Vehicle (NGV) customers:

34 Renewable Gas has a higher value to NGV customers than to other customer
35 types. NGV customers receiving compressed natural gas (CNG) service and
36 liquefied natural gas (LNG) service in British Columbia are eligible for Part 3 fuel
37 supplier status under the BC-LCFS. NGV customers who purchase their own gas
38 supply from a gas marketer are also eligible. Part 3 fuel suppliers that reduce the

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1 carbon intensity of their fuel relative to the baseline carbon intensity identified in
2 the Renewable and Low Carbon Fuel Requirements Regulation can generate
3 credits which can be sold in the credit market. In effect, the current BC-LCFS
4 provides these customers with a financial incentive to reduce their GHG emissions
5 by purchasing Renewable Gas, as discussed in Section 5.7.2.

6 1.5 Considering a portion of FEI's RNG supply will not be eligible for the LCFS at this
7 time, please explain how FEI's rationale to justify a higher proposed rate for NGV
8 customers than other customer types still holds in light of the loss of financial
9 incentives from the LCFS.

10 1.5.1 Please explain whether FEI has considered any alternative rate design
11 proposal for NGV customers, as out-of-province RNG is not being
12 accepted under the BC-LCFS. If so, please specify the amended
13 proposal. If not, please explain why not.
14

15 **Response:**

16 FEI has not considered an alternative rate design proposal given EMLI's position regarding out-
17 of-province RNG under the BC-LCFS. As FEI stated in the response to Brightside IR1 7(i):

18 Ultimately, in designing the revised Renewable Gas Program, FEI considered the
19 policy direction in the CleanBC Roadmap for natural gas utilities to reduce GHG
20 emissions from natural gas combustion. In particular, as described on page 104 of
21 the Application, any GHG emission reductions resulting from the sale of
22 Renewable Gas to NGV customers will not contribute towards the achievement of
23 this public policy target. As such, if Renewable Gas were sold to NGV customers
24 at a discount to the cost of acquisition, the effect would be to increase the costs
25 borne by all other ratepayers as more Renewable Gas would need to be purchased
26 to meet the policy objective.

27 FEI considers that the above rationale is a sufficient basis for its proposal even if NGV customers
28 were not eligible for any credits under the BC-LCFS.

29 While not necessary to justify FEI's proposal, NGV customers are currently still eligible to
30 generate credits under the BC-LCFS on the basis of conventional natural gas fuel codes and RNG
31 fuel codes based on in-province RNG supply and, potentially, RNG supplied from Alberta.
32 Therefore, despite EMLI's position regarding out-of-province RNG under the BC-LCFS, RNG still
33 has a higher value to NGV customers than to other customer types¹.

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35

¹ As discussed on page 104 of the Application and in the response to BCSEA IR1 4.15.

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1 **2.0 Reference: REBUTTAL EVIDENCE TO BRIGHTSIDE**
2 **Exhibit C18-8, BCUC IR 1.3; Exhibit B-64, A3, p. 2; Exhibit B-17,**
3 **BCUC IR 32.1.1**
4 **NGV Customers Eligibility to Earn LCFS Credits**

5 On page 2 of Exhibit B-64, FEI states:

6 Transportation customers may still generate credits under the BC-LCFS for the
7 use of LNG and CNG, as well as RNG from in-province sources. FEI will continue
8 to work with EMLI to have fuel codes approved so that Transportation customers
9 can earn credits under the BC-LCFS.

10 In response to BCUC IR 1.3 in Exhibit C18-8, BrightSide states:

11 [...] Customers who use BC sourced RNG in transportation applications can earn
12 LCF credits provided they meet certain tests including the following:

- 13 1. For R-CNG credit generation the customer must be the owner of the RNG
14 when it is compressed into a transportation fuel. The customer must have
15 title to the RNG when it enters the fueling station that compresses the gas
16 to pressures that make it useful as a transportation fuel.
- 17 2. For R-LNG to generate credits the customer must own the RNG at the point
18 where it is liquefied into a transportation fuel.
- 19 3. For both fuels the party that owns the fuel when it is “manufactured” into a
20 transportation fuel must submit a compliance report to report
21 production/use of the fuel. This report must show the carbon intensity of
22 the fuel lifecycle pathway either through reference to an approved Fuel
23 Code or through “Schedule D” of the compliance report which requires
24 providing elements of the Lifecycle Assessment of the fuel.

25 At present it is only possible to generate LCF credits on RNG which originates in
26 BC. This is due to Ministry policy. Thus it is not possible to earn credits on 70% of
27 the volume that FEI has in its RNG supply plan. (Both existing and planned)

28 To earn credits on BC supplied RNG, the customer must get FEI to designate what
29 RNG source the RNG is coming from and what Carbon Intensity value should
30 apply. To date it has been difficult to get such designations and CI values from
31 FEI. This is problematic because it can take 6-9 months or more to establish an
32 approved fuel code. In some cases (e.g. R-LNG) this has been difficult to do
33 because FEI has been reluctant to share key inputs to the LCA such as energy
34 use for liquefaction.

35 So in summary, it is not possible at present to generate credits from 70% of FEI’s
36 RNG supply. For the remaining 30% supply, credit generation is possible but it has

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1 been very difficult to generate credits because FEI has been reluctant to designate
2 BC sources and to provide required information needed to establish fuel codes.

3 In response to BCUC IR 32.1.1, in Exhibit B-17, FEI states:

4 To assist NGV customers in evaluating the environmental benefits of adopting
5 Renewable Gas, FEI provides an estimate of the carbon intensity of the
6 Renewable Gas supply. For the purposes of BC-LCFS compliance filings required
7 to validate carbon credits, FEI uses the compliance year Renewable Gas volumes
8 produced from each qualified Renewable Gas source with a Fuel Code, and
9 distributes the volumes across all NGV Renewable Gas customers.

10 2.1 Please clarify what the process is for NGV customers to receive LCFS credits
11 based on the RNG purchased from FEI, including any information or documents
12 that FEI needs to provide to the NGV customers.

13
14 **Response:**

15 The following is a summary of FEI's process for NGV customers to receive credits under the BC-
16 LCFS for RNG purchased from FEI:

- 17 1. NGV customers must first sign up for RNG service through one of FEI's biomethane tariffs
18 approved by the BCUC. NGV customers generally select service under Rate Schedule 5B
19 or 11B.
- 20 2. At the end of the year that the RNG supply was received, but prior to the BC-LCFS
21 compliance deadline of March 31 in the following year, FEI provides each of its NGV RNG
22 customers with a report of the RNG volume to apply to each approved fuel code under the
23 BC-LCFS for the previous year. To complete this report:
- 24 ○ FEI gathers the actual volumes of RNG delivered from each approved RNG source
25 and the customer billing data for the year, including both RNG and conventional
26 natural gas volumes.
- 27 ○ FEI then allocates a portion of the volume of each approved RNG fuel code so that
28 each RNG NGV customer receives the same weighted average carbon intensity.

29 Based on direction from EMLI, any RNG purchased that cannot be allocated to an
30 approved RNG fuel code is allocated to the default CNG code. Each fuel code has a CI
31 value accepted by EMLI. Should a new RNG fuel code be approved after the compliance
32 deadline, the NGV customers can create a supplemental report and move volumes from
33 the default CNG code to the newly approved RNG fuel code. The table below shows an
34 example of the information provided by FEI to each RNG NGV customer:

1 **Table 1: Sample RNG NGV Annual Volume Summary**

Customer A			
LCFS Fuel Code	Sources	Volume (GJ)	EMLI approved Carbon Intensity (g CO2e/MJ)
Approved Fuel Code 1	RNG Facility 1	500	10.41
Approved Fuel Code 2	RNG Facility 2	600	-3.42
Default CNG	RNG Claimed as CNG	1,000	63.64
Total RNG Consumption		2,100	

- 2
- 3 3. RNG NGV customers then use the information provided by FEI to submit a compliance
- 4 report through the BC-LCFS online portal – the Transportation Fuels Reporting System
- 5 (TFRS).
- 6 4. Each compliance report is reviewed by EMLI and, if approved, the associated BC-LCFS
- 7 credits are validated in the TFRS.
- 8 5. Once the BC-LCFS credits have been validated by EMLI, the RNG NGV customers are
- 9 able to sell the credits to any other Part 3 Supplier, a list of which is also included on the
- 10 BC-LCFS website.² The transfer of the credits is completed through the TFRS.

11 FEI has provided the above information, including the CI of the FEI-controlled LNG activity for

12 LNG customers that are T-Service customers (i.e., that purchase their own gas), to enable

13 customers to meet the deadline for reporting and claim credits under the BC-LCFS, most recently

14 for the 2022 compliance period.

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18 Further on page 2 of Exhibit B-64, FEI states:

19 In addition, the federal *Clean Fuel Regulations* are now in force, which may provide

20 an opportunity for Transportation customers to generate credits for the use of

21 RNG. FEI understands that BrightSide is actively involved in seeking to generate

22 credits under the Clean Fuel Regulations on behalf of its customers for the use of

23 RNG.

- 24 2.2 Please elaborate what the *Clean Fuel Regulations* is and how it impacts FEI’s NGV
- 25 customers.
- 26

27 **Response:**

28 The federal *Clean Fuel Regulations* require liquid fossil fuel primary fuel suppliers (producers and

29 importers) to gradually reduce the lifecycle CI of the gasoline and diesel that they produce and

² <https://www2.gov.bc.ca/assets/gov/farming-natural-resources-and-industry/electricity-alternative-energy/transportation/renewable-low-carbon-fuels/r/cf-013.pdf>.

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1 sell for use in Canada, by either generating or purchasing credits equivalent to a specified
2 emissions reduction obligation.

3 The *Clean Fuel Regulations* also establish a credit market, where each credit represents a
4 lifecycle emission reduction of one tonne of CO₂e. For each compliance period (typically a
5 calendar year), a primary supplier will demonstrate compliance with their reduction requirement
6 by creating credits or acquiring credits from other creators, and then using the required amount
7 of credits for compliance.

8 Compliance credits can be created in three ways:

- 9 • **Compliance Category 1:** Undertaking projects that reduce the lifecycle carbon intensity
10 of liquid fossil fuels (e.g., carbon capture and storage, on-site renewable electricity, co-
11 processing);
- 12 • **Compliance Category 2:** Supplying low carbon fuels (e.g., ethanol, biodiesel); and
- 13 • **Compliance Category 3:** Supplying fuel or energy to advanced vehicle technology (e.g.,
14 electricity or hydrogen in vehicles).

15 The *Clean Fuel Regulations* were published in the Canada Gazette, Part II, on July 6, 2022, and
16 FEI is in the process of evaluating how its supply of RNG may be used to create credits that can
17 be sold in the credit market. As none of the market participants in the transportation sector have
18 been through a reporting period, the implications of the regulations for FEI's NGV customers are
19 not yet clear.

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23 2.3 Please explain, in FEI's view, whether the *Clean Fuel Regulations* will have
24 restrictions, similar to the LCFS, which limit the eligibility of FEI's current and
25 expected future RNG fuel supply to generate credits.

26

27 **Response:**

28 FEI is still analyzing the *Clean Fuel Regulations* and is in the process of determining the eligibility
29 of its RNG fuel supply to generate credits under this complex regime. As the *Clean Fuel*
30 *Regulations* are federal, the *Clean Fuel Regulations* apply across Canada and are not limited to
31 the use of low-carbon intensity fuels within a particular province. The *Clean Fuel Regulations* also
32 contemplate supply imported into Canada from a foreign supplier. However, there are a number
33 of conditions on such imports and FEI is in the process of determining whether its out-of-Canada
34 RNG supplies will meet the conditions of Environment and Climate Change Canada (ECCC) to
35 be a part of the credit system.

36

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1 **3.0 Reference: REBUTTAL EVIDENCE TO BRIGHTSIDE**
2 **Exhibit B-16, BCUC IR 32.1.1; Exhibit B-64, A4, p. 2**
3 **Existing RNG Fuel Supply**

4 On page 2 of Exhibit B-64, FEI states:

5 The generation of credits under the BC-LCFS process is governed by the Province,
6 not by any internal allocation of supply made by FEI. In particular, as EMLI is
7 responsible for approving fuel codes for RNG, FEI can only allocate volumes from
8 the approved fuel codes to Transportation customers after the necessary
9 approvals are obtained.

10 In response to BCUC IR 32.1.1 in Exhibit B-17, FEI states, “NGV customers who purchase
11 Renewable Gas will not be able to differentiate which sources their supply originated
12 from.”

13 3.1 Since NGV are not able to differentiate which source their RNG is supplied from,
14 please explain why there are multiple fuel codes for the same service delivered by
15 FEI.

16
17 **Response:**

18 FEI provides NGV customers with RNG under its BCUC approved rate schedules from FEI’s
19 bundled supply portfolio. FEI then allocates volumes under fuel codes approved under the BC-
20 LCFS to NGV customers. Please refer to the response to BCUC IR1 2.1 Rebuttal BrightSide for
21 an explanation of this allocation method. While it would be more expedient to have FEI’s entire
22 RNG supply portfolio approved under the same fuel code under the BC-LCFS, the BC-LCFS
23 program requirements are determined by EMLI and are outside of FEI’s control.

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27 3.2 Please elaborate on how FEI can allocate volumes of RNG with approved fuel
28 codes to NGV customers, including any special tracking that needs to be done.

29
30 **Response:**

31 Please refer to the responses to BCUC IR1 2.1 and 3.1 Rebuttal BrightSide.

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 2 **Response:**
 3 FEI considers that its allocation of RNG fuel codes to NGV customers is a business practice that
 4 does not require BCUC approval. FEI notes that EMLI approves all fuel codes and oversees the
 5 process of the creation and monetization of credits under the BC-LCFS.

6 FEI considers that its weighted average method described in the response to BCUC IR1 2.1
 7 Rebuttal BrightSide is a just and reasonable approach as it allocates fuel code RNG volumes to
 8 NGV customers in proportion to the volumes purchased by each customer. At this time, FEI does
 9 not believe that there are any other reasonable alternatives to this approach. For example, FEI
 10 sees no basis on which to implement a “first come first served” approach or give priority to one
 11 NGV customer over another. Rather, FEI considers that the available fuel-code volumes should
 12 be allocated to customers in proportion to the volumes of RNG they purchased.

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16 Further on page 2 of Exhibit B-64, FEI states:

17 FEI has pending applications for fuel codes for in-province sources of RNG under
 18 the BC-LCFS, as well as an application for a fuel code for LNG from Tilbury. FEI
 19 continues to engage with EMLI to resolve these pending applications as soon as
 20 possible.

21 3.4 Please clarify how much of the existing contracted RNG supply, in gigajoules (GJ)
 22 and percentage of total RNG supply contracted, does FEI have approved fuel
 23 codes for.

24

25 **Response:**

26 The following table shows the expected volume from FEI’s total RNG contracted supply, the 2022
 27 total volumes by location and the pro-rated 2022 volumes, which take into account the fuel code
 28 application dates and the RNG volumes that are expected to be eligible under the BC-LCFS in
 29 2022.

Location	BC-LCFS Status	Expected Volume (TJs)	Percent	Total 2022 Volume (TJs)	Percent	Prorated 2022 Volume (TJs)	Percent
BC	Approved	87	0.46%	55	2.43%	55	27.56%
BC	Pending	202	1.08%	103	4.60%	28	14.33%
BC	Contracted but not producing	2,219	11.85%	-	0.00%	-	0.00%
AB	Pending	264	1.41%	204	9.12%	115	58.11%
AB	Contracted but not producing	854	4.56%	-	0.00%	-	0.00%
ON	Pending	98	0.52%	94	4.17%	-	0.00%
ON	Denied	58	0.31%	148	6.60%	-	0.00%
ON	Contracted but not producing	3,415	18.23%	-	0.00%	-	0.00%
USA	Pending	1,636	8.73%	1,639	73.08%	-	0.00%
USA	Contracted but not producing	9,896	52.84%	-	0.00%	-	0.00%
Total BC and AB		3,626	19.36%	362	16.15%	198	100.00%
Total All Contracted RNG		18,730	100.00%	2,243	100.00%	198	100.00%

30

FortisBC Energy Inc. (FEI or the Company) Revised Renewable Gas Program Application – Stage 2 (Application)	Submission Date: April 18, 2023
Response to British Columbia Utilities Commission (BCUC Information Request (IR) No. 1 on FEI Rebuttal Evidence to BrightSide Solutions Inc. (BrightSide)	Page 13

1

2 At the time of filing, FEI has approved fuel codes for 55 TJ in 2022, equivalent to 2.4 percent of
3 its 2022 RNG production. With the approval of outstanding fuel code applications for BC RNG
4 projects, this would increase by 28 TJ, for a total of 83 TJ, equal to 3.7 percent of its 2022 RNG
5 production. Should the outstanding Alberta fuel code applications be approved, it would add
6 another 115 TJ of eligible supply in 2022, for a total of 198 TJ or 8.8 percent of total 2022 RNG
7 production.

8 Of the approximately 19 PJ of contracted RNG supply as of March 31, 2023, about 2.5 PJ or 13.4
9 percent is from BC sources, and 1.1 PJ or 6.0 percent is from Alberta.

10

11

12

13 3.5 Please clarify how much of the existing contracted RNG supply, in GJ and
14 percentage of total RNG supply contracted, does FEI not have a fuel code for, but
15 may be eligible under the current EMLI policy.

16

17 **Response:**

18 Please refer to the response to BCUC IR1 3.4 Rebuttal BrightSide.

19

20

21

22 3.6 Please clarify whether FEI has applied for fuel codes for all potentially eligible
23 contracted RNG supplies that currently do not have a fuel code.

24

25 **Response:**

26 FEI has applied for fuel codes for all RNG sources that are currently producing gas with one
27 exception. The approved fuel code for the Fraser Valley Biogas (BCLCF264.1) expired at the end
28 of 2022, and FEI has not yet filed for a renewal because the plant is currently being expanded.
29 An update to the carbon intensity for this facility will be undertaken once the expanded plant is
30 operational and preliminary operations data can be obtained. FEI will then file a new application
31 for a fuel code for RNG from Fraser Valley Biogas under the BC-LCFS.

32