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May 25, 2023

British Columbia Utilities Commission  
Suite 410, 900 Howe Street  
Vancouver, B.C.  
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Attention: Patrick Wruck, Commission Secretary

Dear Patrick Wruck:

**Re: FortisBC Energy Inc. (FEI)  
2022 Long Term Gas Resource Plan (LTGRP) – Project No. 1599324  
FEI Submission on Need and Scope for Oral Hearing or IR3**

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Pursuant to Order G-17-23 dated January 25, 2023, and Order G-99-23 dated May 1, 2023, the British Columbia Utilities Commission (BCUC) established a further and amended regulatory timetable for the 2022 Long Term Gas Resource Plan (LTGRP) proceeding. The BCUC sought submissions regarding the need and scope for an oral hearing or a third round of information requests (IRs).

FEI's view is that neither an oral hearing nor a third round of IRs is necessary for the BCUC to complete its review of the LTGRP. FEI's position is based on three observations:

1. The current written record is sufficient for the purposes of reviewing FEI's LTGRP;
2. An oral hearing would be highly resource intensive for all participants, given the nature and scope of the proceeding; and
3. The long-term planning environment is currently very dynamic, and resources would be more effectively invested in filing the next resource plan sooner, rather than protracting the current process.

First, FEI has provided transparent, detailed, and thorough information to support the BCUC's review of the Application. The record is voluminous—the Application and associated appendices consist of over 2,000 pages of evidence, and FEI has provided comprehensive responses to approximately 1,700 requests for information. FEI filed a further evidentiary update which was developed in collaboration with FortisBC Inc. (FBC), and responded to IRs arising out of that evidence. As described by the BCUC, “the LTGRP is a high-level planning tool and guide, separate and apart from the future approval processes related to specific programs”,<sup>1</sup> and FEI has provided exhaustive evidence on the items specified in section

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<sup>1</sup> BCUC Decision and Order G-39-19 (2017 LTGRP Decision), p. 29.

44.1(2) of the *Utilities Commission Act* and directed by the BCUC as part of the 2017 LTGRP Decision and Order G-39-19.<sup>2</sup> Further evidence, whether through an oral hearing or third round of IRs, is unlikely to materially contribute to the record.

Second, given the scope and nature of the proceeding, an oral hearing would be highly resource intensive for FEI, the BCUC and interveners. The range of subject-matter expertise involved in developing the evidence in the Application is very broad, covering a spectrum of resource planning issues from energy policy, customer additions and end use demand, to demand side management, renewable and low-carbon energy, system capacity, and transportation demand. An oral hearing would require a range of Company witnesses and executive-level resources to provide the breadth of technical knowledge needed to be responsive to oral questions. The time for witnesses, interveners and the BCUC to prepare and have a productive oral hearing would be significant.

Third, the long-term planning environment is rapidly evolving and creating a moving target for the evidentiary record. Given the urgent need for climate action and the context of accelerated policy and technological change, regulatory efficiency is critical. Concluding this proceeding in an efficient manner will allow for the redirection of Company resources to the refinement of actions to address the dynamic planning environment in FEI's next LTGRP. FEI submits that more frequent LTGRPs, rather than a protracted review process, is the more efficient and effective approach to long-term planning in the current environment. In the meantime, standalone applications will determine the approval or acceptance of FEI's proposed activities.

If the BCUC determines an oral hearing or third round of IRs is warranted, FEI submits that the scope of further process should be tightly focused on those topics that the BCUC determines are needed to assist it in reaching a decision. Therefore, parties advocating for further process should clearly articulate the topics that are proposed to be addressed and specify why the additional procedural step is required for those topics. Parties advocating for an oral hearing should explain why the topics cannot be pursued further by a third round of IRs or addressed in final arguments.

If further information is required, please contact the undersigned.

Sincerely,

**FORTISBC ENERGY INC.**

***Original signed:***

Sarah Walsh

cc (email only): Registered Intervenors

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<sup>2</sup> 2017 LTGRP Decision, Section 7.1, "BCUC Directives".