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September 7, 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)

Application for a Certificate of Public Convenience and Necessity (CPCN) for Approval of the Interior Transmission System Transmission Integrity Management Capabilities Project (Application) ~ Project No. 1599365

Errata to FEI's Rebuttal Evidence to the Residential Consumer Intervener Association (RCIA) Intervener Evidence

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On September 20, 2020, FEI filed the Application referenced above. During the course of responding to Information Requests (IR) No. 3, FEI has identified corrections required to FEI's Rebuttal Evidence (Exhibit B-18) as noted in the response to the BCOAPO IR3 13.1.

Accordingly, FEI submits this Errata filing reflecting the corrections. For ease reference, FEI has provided blacklined versions of the revised pages 5 and 6 from Exhibit B-18 identifying the corrections.

If further information is required, please contact the undersigned.

Sincerely,

FORTISBC ENERGY INC.

Original signed:

Sarah Walsh

Attachments

cc (email only): Registered Interveners

it would need to install the PRS. Is it feasible to install the proposed PRS after receiving the results of the baseline EMAT ILI run?

A11: No. As outlined below, it is not feasible to defer installation of this PRS until after feedback has been received from the vendor.

First, as explained in A5 above, FEI's current expectation is that EMAT ILI reporting with respect to cracks over the full length of the EMAT-inspected pipeline could be provided by the vendor up to 180 days (6 months) following a given tool run. While vendors provide results on a "best efforts" basis (i.e., anytime between the EMAT tool run date and the 180-day timeframe), FEI cannot rely on, or predict with certainty, when reporting will be received.

Second, as explained in A7 above, after the report from the vendor has been received, FEI must undertake its own initial analysis and assessment of vendor-provided information, which FEI expects will take approximately 30 to 60 days (1 to 2 months). Importantly, these activities may result in the identification of cracking requiring a pressure reduction that was not previously identified by the vendor.

In the table below, FEI outlines the feasible timelines to complete the EMAT ILI tool run, receive and interpret the vendor report, and install the proposed PRS at the Yahk Station. This table relies on the following assumptions:

- Based on the weather in the region where the YAH TRA 323 pipeline is located, suitable hydraulic and operational conditions to run ILI tools are generally available between late-March and late-October, although in the operational history reviewed by FEI (from the past approximately 10 years) FEI has only performed tool runs on this pipeline between April and May.
- The vendor provides its preliminary report between approximately 120 days to 180 days (4 to 6 months) following the tool run.
- FEI conducts initial reviews, including conducting initial validation digs, based on the results of the preliminary report within 30 to 60 days (1 to 2 months) of receiving the vendor report.
- Mobilization of contract resources, completion of the work to install and commission the PRS at the Yahk Station takes approximately 60 days (2 months) following identification of cracking.

As shown in the table below, there are no feasible scenarios as either:

1) the EMAT ILI tool cannot be run due to operational conditions (January, February, November, and December); or

2) if the tool run can be completed, there is a possibility that PRS will be required when it is not feasible to install (November to April). FEI expects that it could

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identify cracking requiring a pressure reduction, and would need to respond by reducing the pressure, any time between the earliest and the latest dates, thus making each scenario not feasible.

As such, FEI cannot wait until after the EMAT ILI run to install the PRS at Yahk Station.

Table 1: Timeline and Feasibility of YAHK Station PRS Installation

Tool Run **Red** – Not feasible due to operational conditions **Orange** – Potentially feasible with operational conditions **Green** – Feasible with operational conditions	**Vendor Identifies Cracking and FEI Determines a Pressure Reduction is Required**		**FEI Identifies Cracking and FEI Determines a Pressure Reduction is Required**		**PRS is Operational** **Red** – Not feasible due to weather conditions **Orange** – Potentially feasible with weather conditions **Green** – Feasible with weather conditions		**Feasible?**
	Earliest (4 mo. after EMAT run)	**Latest** (6 mo. after EMAT run)	**Earliest** (1 mo. after vendor earliest)	**Latest** (2 mo. after vendor latest)	**Earliest** (2 mo. after vendor earliest)	**Latest** (2 mo. after FEI latest)	
Jan							No
Feb							No
Mar	Jul	Sept	Aug	Nov	Sept	Jan	No
Apr	Aug	Oct	Sept	Dec	Oct	Feb	No
May	Sept	Nov	Oct	Jan	Nov	Mar	No
Jun	Oct	Dec	Nov	Feb	Dec	Apr	No
Jul	Nov	Jan	Dec	Mar	Jan	May	No
Aug	Dec	Feb	Jan	Apr	Feb	Jun	No
Sept	Jan	Mar	Feb	May	Mar	Jul	No
Oct	Feb	Apr	Mar	Jun	Apr	Aug	No
Nov							No
Dec							No

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Further, REL's suggestion that FEI should have a "drop dead" date at which it installs the PRS[4] is without merit. It would not be prudent for FEI to plan to install the PRS as late as possible in the year, as there are weather conditions and other factors beyond FEI's control which could interfere with or delay installation of the PRS, which could result in FEI needing to reduce pressure using the existing single control valve and impacting the YAH OLI 610 pipeline over the winter.

In any case, as discussed in A12 and A15 below, FEI requires the PRS for maintenance flexibility and ongoing operational reasons. Notably, if FEI had the PRS installed in advance of the EMAT run as proposed, FEI could use it to drop pressure in the YAH TRA 323 pipeline to perform integrity digs and repairs on that line right away, instead of having to use the existing single control valve and impacting the YAH OLI 610 pipeline. As such, FEI would see immediate use of the PRS following the run, regardless of whether it determines the need for a longer-term pressure reduction to 80 percent EOP.

[4] Exhibit C2-8, CEC-RCIA IR1 1.4.