



Sarah Walsh
Director, Regulatory Affairs

Gas Regulatory Affairs Correspondence
Email: gas.regulatory.affairs@fortisbc.com

Electric Regulatory Affairs Correspondence
Email: electricity.regulatory.affairs@fortisbc.com

FortisBC
16705 Fraser Highway
Surrey, B.C. V4N 0E8
Tel: (778) 578-3861
Cell: (604) 230-7874
Fax: (604) 576-7074
www.fortisbc.com

October 9, 2024

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

Attention: Patrick Wruck, Commission Secretary

Dear Patrick Wruck:

Re: FortisBC Energy Inc. (FEI)
2023 Customer Choice Annual General Meeting (AGM)
FEI Submission on Draft Revised Code of Conduct and Items in Appendix B

FEI provides the following comments in accordance with the regulatory timetable established in British Columbia Utilities Commission (BCUC) Order G-234-24. Order G-234-24 established a process for the eighth Customer Choice Program AGM to review the Code of Conduct setting out the items under review in the Appendix B. FEI has no concerns with most of the items and has, therefore, limited its comments to the following for BCUC consideration.

DEFINITIONS, page 2

For clarity, FEI suggests that a definition for the term indexation or indexed agreement be added.

PRESENTATION OF THE OFFER - Article 8, page 6

FEI suggests that the addition of the sentence: "Salespersons shall not identify themselves as being associated either with the Commission or the LDC." could be rephrased from the negative to the positive form to provide more clarity. For example: "Salespersons shall identify themselves as independent gas marketers and not employed by or associated with the LDC or the Commission."

RENEWAL AND AMENDMENT OF AGREEMENTS - Article 28, page 15

Please note that currently the 5 year contract rule system logic is set to accept a new enrolment less than or equal to 365 days prior to the current contract end date. For example, if the contract expires on 2025/04/01, a new contract can be submitted on or after 2024/04/01. Historically, this is how the gas marketers have been submitting their new contract terms with existing customers. A change to the GEM system to alter the system logic related to the allowable time frame would be required to enable the proposed "between 180 and 90 days

prior to the applicable renewal date”. The scope of such a change, if it were to be required, would need to be evaluated to determine the associated costs and time to implement.

Additionally, in the case of a contract amendment, the consumer would need to be given 90 days notice before the program entry date rather than 30 days notice in order to accommodate the proposed timeline. All enrolments into the GEM system must be received greater than 30 days before the program entry date in order to be accepted and included in the gas supply process. For example, an enrolment with an entry date of 2024/12/01 must be received in the GEM system by 2024/10/31 so notice would need to be given to the consumer by 2024/08/31. The system logic is written to accept all enrolments as a new enrolment. There is no distinction between a first time enrolment and a renewal. FEI requests 90 days notice be given for a contract amendment in order to accommodate the timeline before the program entry date.

CANCELLATION OF AMENDMENT OF AGREEMENTS, page 17

FEI notes that the original contract would have been dropped already with an anniversary drop in order to accommodate the new amended contract enrolment. Any back-dated enrolments would require a request from the gas marketer to FEI to perform a manual enrolment.

GENERAL COMMENTS

FEI appreciates the opportunity to provide its comments to the BCUC on the proposed revised Code of Conduct. In addition to the specific comments above, FEI offers two further general suggestions. First, the spelling of “enrolment” is inconsistent throughout and could be standardized. Second, the BCUC may wish to consider a gender neutral perspective where the Code of Conduct refers to “he” or “she” by replacing those occurrences with “they” throughout.

If further information is required, please contact Scott Webb, Manager, Market Research and Customer Choice Program at 604-592-7649.

Sincerely,

FORTISBC ENERGY INC.

Original signed:

Sarah Walsh

cc (email only): Licensed Gas Marketers