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February 27, 2020

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

Attention: Mr. Patrick Wruck, Commission Secretary and Manager, Regulatory Support

Dear Mr. Wruck:

Re: FortisBC Energy Inc. (FEI)

Application for Permanent Rates and Revised Tariff Pages for Rate Schedule 46 – Liquefied Natural Gas Sales, Dispensing, Liquefied Natural Gas Transportation Service and Transportation Service (RS 46) effective January 1, 2020

Response to the British Columbia Utilities Commission (BCUC) Information Request (IR) No. 1

On January 16, 2020, FEI filed the above noted Application. In accordance with BCUC Order G-20-20 setting out the Regulatory Timetable for the review of the Application, FEI respectfully submits the attached response to BCUC IR No. 1.

If further information is required, please contact Ilva Bevacqua at 604-592-7664.

Sincerely,

FORTISBC ENERGY INC.

Original signed:

Doug Slater

Attachments



FortisBC Energy Inc. (FEI or the Company) Application for Permanent Rates and Revised Tariff Pages for Rate Schedule 46 (RS 46) – Liquefied Natural Gas Sales, Dispensing and Transportation Service effective January 1, 2020.	Submission Date: February 27, 2020
Response to British Columbia Utilities Commission (BCUC) Information Request (IR) No. 1	Page 1

1 **Reference:** **INTRODUCTION**
2 **Exhibit B-1, (Application), p. 3; Rate Schedule 46 Liquefied Natural**
3 **Gas Sales, Dispensing, Liquefied Natural Gas Transportation**
4 **Service and Transportation Service (Rate Schedule 46), Section 1, p.**
5 **R-46.5**
6 **Housekeeping Changes**

7 On page 3 of the Application, FortisBC Energy Inc. (FEI) states:

8 The first proposed revision is an update to the percentage factor used to
9 calculate the applicable process fuel gas for FEI facilities, included in the
10 definition of Process Fuel Gas on page R-46.5 of the RS 46 Tariff. The factor has
11 been updated from 1 percent to 1.8 percent of the LNG dispensed to RS 46
12 customers.

13 On page R-46-5 of FEI Rate Schedule 46, it states:

14 Process Fuel Gas is deemed to be a quantity equal to 1% (one percent) of the
15 LNG Dispensed to the Customer for this Rate Schedule after the Available LNG
16 Capacity exceeds 20,000 Gigajoules per Day, but thereafter the Process Fuel
17 Gas percentage will be updated annually based on the prior year’s actual
18 percentages of Gas consumed and losses of Gas at the LNG Facilities.

19 1.1 Please confirm that the updated factor of 1.8 percent of Process Fuel Gas was
20 calculated based on the prior year’s actual percentage of gas consumed and
21 losses at the liquified natural gas (LNG) facilities.

22
23 **Response:**

24 Not confirmed. The Process Fuel Gas (gas consumed in the production of LNG and losses of
25 gas) percentage factor is the ratio of the fuel gas used plus losses of gas which occurs during
26 the production of LNG. In other words, Process Fuel Gas is gas that is consumed as part of the
27 process to produce net LNG delivered to the customer.

28 The current Process Fuel Gas was originally set at 1.0 percent based on an estimate provided
29 by potential LNG Facility builders during the Front End Engineering Design (FEED) stage of the
30 Tilbury Expansion Project. In proposing the increase to 1.8 percent, FEI based its calculation
31 on the final design criteria for the Tilbury Expansion facility and its net LNG production capacity
32 confirmed by FEI’s build contractor.



FortisBC Energy Inc. (FEI or the Company) Application for Permanent Rates and Revised Tariff Pages for Rate Schedule 46 (RS 46) – Liquefied Natural Gas Sales, Dispensing and Transportation Service effective January 1, 2020.	Submission Date: February 27, 2020
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1 When FEI had proposed the increase for the Process Fuel Gas from 1.0 percent to 1.8 percent,
2 it intended to set the rate based on the best available information which would reflect a more
3 accurate rate until actual data could be used in the calculation the following year.

4 In retrospect, given that FEI is not able to calculate the Process Fuel Gas ratio based on
5 information reflecting the entire prior year's (2019) actual percentage of Gas consumed and
6 losses of Gas at the LNG Facility, as described in the RS 46 Tariff, FEI hereby withdraws its
7 request to amend the Process Fuel Gas ratio at this time. Instead, FEI will recalculate the
8 Process Fuel Gas ratio for rates effective January 1, 2021 based on the actual information for
9 2020 for the entire year. FEI notes that at that time, it is likely that the Process Fuel Gas ratio
10 will need to increase to 1.8 percent or higher.

11 In Attachment 1.1, FEI has provided the revised Appendices B and C to the Application to
12 reflect the withdrawal of the Process Fuel Gas ratio amendment.

13
14
15

16 1.1.1 If confirmed, please provide all relevant information applicable to this
17 calculation (i.e. prior years actual percentages gas consumed and loss).

18
19 **Response:**

20 Please refer to the response to BCUC IR1 1.1.

21
22
23

24 1.1.2 If not confirmed, please indicate how the factor of 1.8 percent of
25 Process Fuel Gas was calculated and provide an explanation for why
26 this method was chosen.

27 **Response:**

28 Please refer to the response to BCUC IR1 1.1. Given FEI has withdrawn its request to amend
29 the Process Fuel Gas ratio at this time, the calculation, which was based on design criteria, is
30 no longer relevant.

31

Attachment 1.1

Appendix B

REVISED TARIFF PAGES - PROFORMA

shall be measured through the use of other industry standard measuring methods and measuring equipment.

Conversion to Energy Units - In accordance with the *Electricity and Gas Inspection Act* of Canada, volumes of LNG Dispensed each Day will be converted to energy units by multiplying the standard volume by the Heat Content of each unit of LNG. Volumes will be specified in kilograms or pounds rounded to the nearest unit and energy will be specified in Gigajoules rounded to one decimal place. FortisBC Energy will use the following formula to convert kilograms or pounds of LNG to GJ of LNG:

23.3

Converting Weight of LNG to Gigajoules

	Gross Weight after LNG Dispensing (kilograms or pounds)
minus	Gross Weight prior to Dispensing (kilograms or pounds)
equals	Net Weight of the Delivered LNG (kilograms or pounds)
	Net Weight of the Delivered LNG (kilograms or pounds)
multiplied by	The energy density as determined by FortisBC Energy through analysis of vaporized LNG on a periodic basis. For greater certainty, unless otherwise determined by FortisBC Energy, the energy density shall be 0.055 gigajoule/kilogram or 0.025 gigajoule/pound equals Delivered LNG (Gigajoule). C/N/O

24 Default or Bankruptcy

24.1

Default by the Customer or the Shipper - If the Customer or the Shipper at any time fails or neglects

- (a) to make any payment due to FortisBC Energy or as designated under this Rate Schedule within 30 calendar Days after payment is due, or
- (b) to correct any default of any of the other terms, covenants, agreements, conditions or obligations imposed upon it under this Rate Schedule, within 30 calendar Days after FortisBC Energy gives to the Customer or Shipper notice of such default, or
- (c) in the case of a default that cannot with due diligence be corrected within a period of 30 Days, the Customer or Shipper fails to proceed promptly after the giving of such notice to correct the same and thereafter to prosecute the correcting of such default with all due diligence,

then FortisBC Energy may in addition to any other remedy that it has, including the rights of FortisBC Energy set out in Sections 10.3 (Default Regarding Curtailment), 11.2 (Charges for Unauthorized Service), 11.3 (Payments Not License), and 11.4 (Demand Surcharge), at its option and without liability therefor:

Order No.:

Issued By: Doug Slater, Director, Regulatory Affairs

Effective Date: January 1, 2020

Accepted for Filing: _____

BCUC Secretary: _____

First Revision of Page R-46.26

Table of Charges for LNG Transportation Service

All sales and service taxes, carbon tax and any future new taxes, are extra and shall be applied as applicable.

2020 LNG Tanker Charges per Day or Partial Day	Standard Tanker	\$289.00	A
	Tridem Tanker	\$346.00	
	Marine Equipped Tridem Tanker	\$487.00	
LNG Tanker Charges per Day or Partial Day for 2021 and subsequent years	2020 LNG Tanker Charges, escalated annually at the greater of 2% or the British Columbia Consumer Price Index.		
LNG Tanker Hauling Charge	FortisBC Energy cost plus 15% Administration Charge		

Notes:

1. For the purpose of calculating LNG Tanker Charges per Day or Partial Day:
 - (a) Standard Tanker means a Tanker with a capacity of approximately 11,000 US gallons;
 - (b) Tridem Tanker means a Tanker with a capacity of approximately 16,000 US gallons; and
 - (c) Marine Equipped Tridem Tanker means a Tridem Tanker equipped with apparatus specific to marine fueling requirements.

2. The charges set out in this Table of Charges for LNG Transportation Service are not applicable if the Tanker is used as both Dispensing equipment for LNG Service and as equipment for LNG Transportation Service.

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Second Revision of Page R-46.35

Table of Charges for LNG Service

All sales and service taxes, carbon tax and any future new taxes, are extra and shall be applied as applicable.

2020 LNG Facility Charge	\$ 4.03/GJ	A
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2020 Electricity Surcharge	\$ 1.00/GJ	A
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Commodity Related Charges per Gigajoule

Storage and Transport Charge	\$ 0.716/GJ
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Rider 6	\$ (0.045)/GJ
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Subtotal of Storage and Transport Related Charges	\$ 0.671/GJ
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Cost of Gas ¹ (Commodity Cost Recovery Charge)	\$ 1.549/GJ
--	-------------

Cost of Biomethane (Biomethane Energy Recovery Charge) ^{2, 3}	\$ 10.535/GJ
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2020 LNG Spot Charge	\$ 5.28/GJ	A
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LNG Facility Charges, Electricity Surcharges, and LNG Spot Charges for 2021 and thereafter	Per Note 4
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Storage and Transport Related Riders

Rider 6	Midstream Cost Reconciliation Account - Applicable to Mainland and Vancouver Island Service Area Customers, excluding Revelstoke, for the Year ending December 31, 2020.
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Order No.:	Issued By: Doug Slater, Director, Regulatory Affairs
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Effective Date: January 1, 2020	Accepted for Filing: _____
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Notes:

1. The Cost of Gas is based on the calculation of 100% of a Customer's consumption in Gigajoules, minus the percentage of a Customer's selection of Biomethane measured in Gigajoules, multiplied by the Cost of Gas (Commodity Cost Recovery Charge) per Gigajoule. For example, if a Customer selects 30% Biomethane, the Cost of Gas will be calculated on 70% (100% - 30%) of a Customer's consumption.

The percentage of Biomethane of a Customer's Gas usage available to Customers is set by FortisBC Energy and includes a range between 5% of Biomethane and 100% of Biomethane, increasing by increments of 5%.

2. The Cost of Biomethane is based on the calculation of a Customer's selection of the percentage of Biomethane measured in Gigajoules, multiplied by the Cost of Biomethane (Biomethane Energy Recovery Charge) per Gigajoule.
3. The Cost of Biomethane (Biomethane Energy Recovery Charge) per Gigajoule has been determined in accordance with Section 28.4 (Price Determination) in the General Terms and Conditions of FortisBC Energy). The Cost of Biomethane effective January 1, 2020 equals the sum of:

(i)	The British Columbia Utilities Commission approved January 1st Commodity Cost Recovery Charge per Gigajoule	\$	1.549
(ii)	The current British Columbia carbon tax applicable to conventional natural gas Customers per Gigajoule	\$	1.986
(iii)	Other taxes applicable to conventional natural gas sales per Gigajoule	\$	0.000
(iv)	A premium of \$7.00 per Gigajoule	\$	<u>7.000</u>
(v)	Total Cost of Biomethane per Gigajoule	\$	10.535

4. **LNG Facility Charges, Electricity Surcharges, and LNG Spot Charges for 2021 and beyond** - The LNG Facility Charges, Electricity Surcharges, and LNG Spot Charges for 2021 and thereafter will be determined by taking the charges, which are expressed in 2020 dollars, and resetting and adjusting those charges annually on January 1 in accordance with (1) below.

(1) The charges, which are presented in 2020 dollars, will be reset and adjusted annually as follows:

- (a) The LNG Facility Charge shall be escalated annually at the greater of 2% or the British Columbia Consumer Price Index.

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Second Revision of Page R-46.37

Table of Charges for Transportation Service

All sales and service taxes and any future new taxes, are extra and shall be applied as applicable.

Dispensing Service Charges

1. 2020 LNG Facility Charge	\$ 4.03/GJ	A
2. 2020 Electricity Surcharge	\$ 1.00/GJ	
3. 2020 LNG Spot Charge	\$ 5.28/GJ	
4. LNG Facility Charges, Electricity Surcharges, and LNG Spot Charges for 2021 and thereafter	Per Note 1	

Transportation Charges

5. Administrative Charge per Month	\$ 39.00	
6. Unauthorized Overrun Gas Charges		
(a) Per Gigajoule on first 5 percent of specified quantity	Sumas Daily Price ²	
(b) Per Gigajoule on all Gas over 5 percent of specified quantity	The greater of \$20.00/GJ or 1.5 x the Sumas Daily Price ³	
7. Charge per Gigajoule of Balancing Service provided		
(a) Quantities of Gas less than 10% of the Rate Schedule 46 Authorized Quantity		
(i) between and including April 1 and October 31	No charge	
(ii) between and including November 1 and March 31	No charge	
(b) Quantities of Gas over the greater of 100 Gigajoules or equal to or in excess of 10% or less than 20% of the Rate Schedule 46 Authorized Quantity		
(i) between and including April 1 and October 31	\$ 0.25	
(ii) between and including November 1 and March 31	\$ 0.25	
(c) Quantities of Gas over the greater of 100 Gigajoules or equal to or in excess of 20% of the Rate Schedule 46 Authorized Quantity		
(i) between and including April 1 and October 31	\$ 0.30	

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(ii) between and including November 1 and March 31	\$ 1.10
8. Charge per Gigajoule of Balancing and Backstopping Gas	Sumas Daily Price ²
9. Replacement Gas³	Sumas Daily Price ² plus 20 Percent

Notes:

1. **LNG Facility Charges, Electricity Surcharges, and LNG Spot Charges for 2021 and beyond** - The LNG Facility Charges, Electricity Surcharges, and LNG Spot Charges for 2021 and thereafter will be determined by taking the charges, which are expressed in 2020 dollars, and resetting and adjusting those charges annually on January 1 in accordance with (1) below.
2. As defined under Section 1.1, the Sumas Daily Price quoted each Day will apply to Gas Dispensed on that gas day.
3. The Sumas Daily Price for the sixth Business Day following the Day for which the Peaking Gas was authorized plus 20 percent.

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Appendix C

REVISED TARIFF PAGES – BLACKLINED

shall be measured through the use of other industry standard measuring methods and measuring equipment.

23.3 Conversion to Energy Units - In accordance with the *Electricity and Gas Inspection Act* of Canada, volumes of LNG Dispensed each Day will be converted to energy units by multiplying the standard volume by the Heat Content of each unit of LNG. Volumes will be specified in kilograms or pounds rounded to the nearest unit and energy will be specified in Gigajoules rounded to one decimal place. FortisBC Energy will use the following formula to convert kilograms or pounds of LNG to GJ of LNG:

Converting Weight of LNG to Gigajoules

Gross Weight after LNG Dispensing (kilograms or pounds)
minus Gross Weight prior to Dispensing (kilograms or pounds)
equals Net Weight of the Delivered LNG (kilograms or pounds)
Net Weight of the Delivered LNG (kilograms or pounds)
multiplied by The energy density as determined by FortisBC Energy through analysis of vaporized LNG on a periodic basis. For greater certainty, unless otherwise determined by FortisBC Energy, the energy density shall be 0.055 gigajoule/kilogram or 0.025 gigajoule/pound equals Delivered LNG (Gigajoule).

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24 Default or Bankruptcy

24.1 Default by the Customer or the Shipper - If the Customer or the Shipper at any time fails or neglects

- (a) to make any payment due to FortisBC Energy or as designated under this Rate Schedule within 30 calendar Days after payment is due, or
- (b) to correct any default of any of the other terms, covenants, agreements, conditions or obligations imposed upon it under this Rate Schedule, within 30 calendar Days after FortisBC Energy gives to the Customer or Shipper notice of such default, or
- (c) in the case of a default that cannot with due diligence be corrected within a period of 30 Days, the Customer or Shipper fails to proceed promptly after the giving of such notice to correct the same and thereafter to prosecute the correcting of such default with all due diligence,

C/N

then FortisBC Energy may in addition to any other remedy that it has, including the rights of FortisBC Energy set out in Sections 10.3 (Default Regarding Curtailment), 11.2 (Charges for Unauthorized Service), 11.3 (Payments Not License), and 11.4 (Demand Surcharge), at its option and without liability therefor:

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Effective Date: January 1, 2020 Accepted for Filing: _____
BCUC Secretary: _____ First Revision of Page R-46.26

**Table of Charges
for LNG Transportation Service**

All sales and service taxes, carbon tax and any future new taxes, are extra and shall be applied as applicable.

2020 LNG Tanker Charges per Day or Partial Day	Standard Tanker	\$289.00	C
	Tridem Tanker	\$346.00	
	Marine Equipped Tridem Tanker	\$487.00	
LNG Tanker Charges per Day or Partial Day for 2021 and subsequent years	2020 LNG Tanker Charges, escalated annually at the greater of 2% or the British Columbia Consumer Price Index.		C
LNG Tanker Hauling Charge	FortisBC Energy cost plus 15% Administration Charge		

Notes:

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 - (a) Standard Tanker means a Tanker with a capacity of approximately 11,000 US gallons;
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2. The charges set out in this Table of Charges for LNG Transportation Service are not applicable if the Tanker is used as both Dispensing equipment for LNG Service and as equipment for LNG Transportation Service.

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**Table of Charges
for LNG Service**

All sales and service taxes, carbon tax and any future new taxes, are extra and shall be applied as applicable.

2020 LNG Facility Charge \$ ~~4.03~~/GJ

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2020 Electricity Surcharge \$ ~~1.00~~/GJ

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Commodity Related Charges per Gigajoule

Storage and Transport Charge \$ 0.716/GJ

Rider 6 \$ (0.045)/GJ

Subtotal of **Storage and Transport** Related Charges \$ **0.671/GJ**

Cost of Gas¹ (Commodity Cost Recovery Charge) \$ 1.549/GJ

Cost of Biomethane (Biomethane Energy Recovery Charge)^{2,3} \$ 10.535/GJ

2020 LNG Spot Charge \$ ~~5.28~~/GJ

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LNG Facility Charges, Electricity Surcharges, and LNG Spot Charges for 2021 and thereafter Per Note 4

Storage and Transport Related Riders

Rider 6 **Midstream Cost Reconciliation Account** - Applicable to Mainland and Vancouver Island Service Area Customers, excluding Revelstoke, for the Year ending December 31, 2020.

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Notes:

1. The Cost of Gas is based on the calculation of 100% of a Customer's consumption in Gigajoules, minus the percentage of a Customer's selection of Biomethane measured in Gigajoules, multiplied by the Cost of Gas (Commodity Cost Recovery Charge) per Gigajoule. For example, if a Customer selects 30% Biomethane, the Cost of Gas will be calculated on 70% (100% - 30%) of a Customer's consumption.

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(v)	Total Cost of Biomethane per Gigajoule	\$	10.535	A

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Order No.: _____ Issued By: Doug Slater, Director, Regulatory Affairs

Effective Date: January 1, 2020 _____ Accepted for Filing: _____

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**Table of Charges
for Transportation Service**

All sales and service taxes and any future new taxes, are extra and shall be applied as applicable.

Dispensing Service Charges

1. 2020 LNG Facility Charge	\$ 4.03 /GJ	
2. 2020 Electricity Surcharge	\$ 1.00 /GJ	
3. 2020 LNG Spot Charge	\$ 5.28 /GJ	C
4. LNG Facility Charges, Electricity Surcharges, and LNG Spot Charges for 2021 and thereafter	Per Note 1	

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Transportation Charges

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(i) between and including April 1 and October 31	\$ 0.30	

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BCUC Secretary: _____ Second Revision of Page R-46.39

(ii) between and including November 1 and March 31 \$ 1.10

8. **Charge per Gigajoule of Balancing and Backstopping Gas** Sumas Daily Price²

9. **Replacement Gas³** Sumas Daily Price² plus
20 Percent

Notes:

1. **LNG Facility Charges, Electricity Surcharges, and LNG Spot Charges for 2021 and beyond** - The LNG Facility Charges, Electricity Surcharges, and LNG Spot Charges for 2021 and thereafter will be determined by taking the charges, which are expressed in 2020 dollars, and resetting and adjusting those charges annually on January 1 in accordance with (1) below.
2. As defined under Section 1.1, the Sumas Daily Price quoted each Day will apply to Gas Dispensed on that gas day.
3. The Sumas Daily Price for the sixth Business Day following the Day for which the Peaking Gas was authorized plus 20 percent.

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