NP-CA-88

- 2 Reference: Page 14, Lines 5-6
 - Q. Does Mr. Todd agree that regulatory mechanisms that permit recovery of energy supply costs, as shown in CA-NP-444, are common among regulated investor owned distribution utilities in Canada? If not, provide evidence to the contrary.

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- A. Mr. Todd was not asked by the Consumer Advocate to conduct a survey of other jurisdictions to determine the regulatory treatment of variances in energy supply costs.
- However, based on his incidental knowledge of other Canadian jurisdictions, it is his understanding that:
 - there are few investor-owned electricity distribution utilities in Canada;
 - natural gas distribution utilities typically have rate structures that accommodate retail competition and therefore have unbundled rates so that commodity costs are passed through to customers separately from distribution rates;
 - Fortis BC is permitted recovery of energy supply costs, subject to the supply costs being reviewed annually by intervenors and the BCUC at its Annual Review;
 - other jurisdictions with investor-owned electricity distributors (Alberta and Ontario) have competitive markets for electricity; hence, rates are unbundled and the rates paid for power by distributors on behalf of their customers is not regulated.
 - Mr. Todd is not aware of any jurisdiction in Canada where rates are fully regulated (i.e., energy rates as well as distribution rates) that have a mechanism similar to the Energy Supply Cost Variance clause that is being proposed by NP.