

# William J. Andrews

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British Columbia Utilities Commission  
Sixth Floor, 900 Howe Street, Box 250  
Vancouver, BC, V6Z 2N3  
Attn: Erica Hamilton, Secretary  
By Web Posting

Dear Madam:

Re: Long Term Electricity Transmission Requirements Inquiry,  
BCUC Orders No. G-30-09, G-47-09, BCUC Project # 3698545  
Comments on the *Commission Staff Discussion Draft on Scope* (Exhibit A-12)

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This is on behalf of the participants B.C. Sustainable Energy Association (BCSEA), the Sierra Club of British Columbia (SCBC), Forest Ethics, West Coast Environmental Law Association, The Pembina Institute, and Dogwood Initiative (collectively, BCSEA, *et al*).

The purpose of this letter is to provide comments on the scope of the proceeding.

BCSEA, *et al* commend Commission Staff regarding the May 21, 2009 *Staff Discussion Draft on Scope of the Inquiry* (Exhibit A-12). The *Discussion Draft* provides a very useful framework for discussion at the June 18 workshop.

BCSEA, *et al*'s comments follow the headings of the *Discussion Draft*.

### **Introduction**

1. Re: *Discussion Draft*, "Introduction," p.1: It may be useful to note in the Introduction that the Terms of Reference are legally binding, having been specified by the Minister of Energy, Mines and Petroleum Resources pursuant to s.5(6) of the *Utilities Commission Act*; and that the role of the Scope Document (and the Panel's scope decision) is to provide additional detail within the framework of the Terms of Reference.
2. In addition, re *Discussion Draft*, "Introduction," p.1, it may be useful to note that the Terms of Reference require the Commission to do two different types of task: (i) to *assess* certain things, and (ii) to make *determinations* regarding certain things.

The distinction is important. At face value, and subject to potential future legal submissions, it would seem that "determinations" are "decisions" under the *Utilities Commission Act*. As such, *determinations* would presumably engage provisions under the *Utilities Commission Act* regarding, e.g., written reasons, reconsideration by the Commission and leave to appeal by the BC Court of Appeal. In addition, *determinations* by the Commission may have legal significance in terms of the Crown's obligation to consult and if necessary accommodate regarding possible infringement of First Nations' rights and title, and in terms of the Commission's legal obligation, if any, to decide whether the

Honour of the Crown has been upheld by BC Hydro/BCTC in the course of this proceeding.

It should also be noted that an *assessment* by the Commission (i.e., the product of the Commission's legal mandate to "assess" items enumerated in the Terms of Reference) may or may not (again, not intending to express a legal position) engage s.79 of the *Act*. For reference, s.70 states:

**Findings of fact conclusive**

**79** The determination of the commission on a question of fact in its jurisdiction, or whether a person is or is not a party interested within the meaning of this Act, is binding and conclusive on all persons and all courts.

Thus, it is not as simple as saying that "determinations" *are* legally binding and "assessments" are *not* legally binding.

To re-emphasize, nothing in this paragraph is intended to be a statement of legal position. These topics are referred to for identification only. The purpose is merely to illustrate that there could be important consequences associated with the distinction between a Commission "assessment" and a Commission "determination" and so it would be desirable to consistently distinguish the two in the text regarding scoping.

3. On p.1, the Staff indicate that "further clarification related First Nations participation would also be helpful." BCSEA, *et al* agree, and address this topic under the under "First Nations," below.

***Assessment of Generation***

4. On the bottom of p.1 and the top of p.2, the *Discussion Draft* paraphrases section 3 of the Terms of Reference, including the list of factors that the Commission must consider in assessing the generation resources in B.C. There is an omission in the paraphrased version of item (iii), which should read: "areas inappropriate for development such as, but not limited to, parks and protected areas." [Underlined phrase from the Terms of Reference.] This is a substantive point, because it confirms that 'areas inappropriate for generation' is not limited to parks and protected areas, a topic which is addressed later in the *Discussion Draft*.
5. In the same list, the paraphrased version of ToR s.3(iv) regarding electricity resources that will be required to be developed omits the Terms of Reference's qualifying phrase "taking into account the objectives of the Energy Plan, the provisions of the *Act* and regulations issued under the *Act*." While it may go without saying that the Commission *must* take into account the *Act* and regulations under the *Act*, the Terms of Reference's stipulation that in making its assessment of generation resources the Commission *must* consider the *Energy Plan* is not necessarily redundant.
6. Item (v) of the paraphrased list refers to "potential future market opportunities to export clean or renewable or low carbon electricity." This omits the Terms of Reference's phrase "that is surplus to the requirements of load-serving utilities in British Columbia."

[underline added] This additional phrase in the Terms of Reference is significant in that it appears to specify exports of electricity that is generated for export and not generated to meet BC Hydro's "self-sufficiency with insurance" requirement.

This relates to an important scoping topic: what exactly is meant by "exports"? One basic question is whether the inquiry is to include the transmission ramifications of electricity exports where such electricity (energy or capacity) is *in excess* of the amount of electricity required to meet domestic needs as defined by "self-sufficiency with insurance."<sup>1</sup>

BCSEA, *et al* are of the view that the Terms of Reference *do* contemplate the inquiry addressing exports of electricity above and beyond exports of power that is available because of the "self-sufficiency with insurance" requirement. BCSEA, *et al* are also of the view that the Commission *should* address such exports, if the Commission decides that it is allowed to, but not required to, address the topic.

By way of background, it should be noted that such exports would be qualitatively different, in policy terms, than the *status quo* in which electricity exports by BC Hydro are limited to economic trade opportunities arising from whatever energy and capacity is developed to meet "self-sufficiency with insurance." As the Commission is aware, there is no present mandate for BC Hydro to develop generation purely for export.

The preamble of the Terms of Reference does state:

WHEREAS the 2007 Speech from the Throne stated that Government will pursue British Columbia's potential as a net exporter of clean, renewable energy..."  
[underline added]

However, the term "net exporter" is not definitive. The legally binding requirement for self-sufficiency with insurance guarantees that there will be electricity (energy and/or capacity) available for economic trade in all but a critical water period.<sup>2</sup> Combined with the 90% clean or renewable requirement, the "self-sufficiency with insurance" requirement guarantees that BC will be a "net exporter of clean, renewable energy [electricity]" as soon as BC Hydro is able to increase domestic generation capability (i.e., by Electricity Purchase Agreements with IPPs and by BC Hydro Resource Smart projects) en route to achieving the 2016 (self-sufficiency) and 2026 (with insurance) milestones.<sup>3</sup> In policy terms, that is a

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<sup>1</sup> I use "self-sufficiency with insurance" as a shorthand for the legally binding requirements of Special Direction 10 that BC Hydro be *capable* of using domestic generation to meet domestic load in critical (low) water periods (self-sufficiency) by 2016 and to have an additional 3,000 GWh/y "insurance" by 2026.

<sup>2</sup> A critical water period is a year or series of years of low water conditions that are as low as any on record. The amount of electricity that could be generated by BC Hydro's large hydroelectric system in a critical water period is considered the maximum amount power that can be assured to be available in future years (i.e., for planning purposes).

<sup>3</sup> Another potentially confusing factor that needs to be accounted for here is the difference between (i) *actual* exports (and imports) not adjusted for actual water levels, (ii) actual exports (and imports) adjusted to "normal" water levels, and (iii) exports for *planning purposes* which

qualitatively different type of export than a ‘generation for export’ regime, which the BC government has not (yet?) espoused for BC Hydro.<sup>4</sup>

A second, related, scoping topic is whether the “exports” to be assessed by the Commission are limited to exports by BC Hydro or include exports (from BC) by other parties. If so, which of the following types of other exporting parties are included: (i) the very small number of existing electricity generators in B.C. that directly export relatively tiny amounts of power, (ii) Powerex regarding its buying and selling of power *not* on BC Hydro’s account, (iii) potential future IPP generation plants not exclusively contracted to BC Hydro,<sup>5</sup> (iv) owners of existing ‘self-generation’ that could conceivably (subject to policy changes and Commission approval) become available for sale to parties other than BC Hydro,<sup>6</sup> (v) parties that wish to move power *through* B.C.?

BCSEA, *et al* generally favours an inclusive approach to the scope of generation for export, but awaits input from other participants before taking a definitive position.

7. In the first bullet under “In Scope” on p.2,, Staff lists:

- Information on sources of electricity supply from the BC Hydro Long Term Acquisition Plan ("LTAP") and recent calls for power, FortisBC, and any other reliable sources of information

It should be confirmed that the intention is not to limit consideration to information on specific projects and proposals but to include estimates of economically-developable potential, so that the Commission and Province will be prepared for future proposals.

In particular, BCSEA, *et al* are concerned that B.C.’s submissions to the WREZ process generally limited the identified quality renewable generation areas to places where there are existing generation proposals or prospecting. This naturally tends to limit the identified quality renewable generation areas to areas that are close to the *existing* transmission grid. This, in turn, tends to eliminate consideration of potentially desirable quality renewable generation areas that could be accessible by an *extension* of the transmission grid.

8. In the fourth bullet under “In Scope” on p.2, Staff lists:

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are generally determined at critical (low) water levels. All three are valid concepts for certain purposes, but interchanging them creates confusion.

<sup>4</sup> Theoretically, the existing law allows a party in B.C. to export electricity by purchasing transmission services under BCTC’s Open Access Transmission Tariff. However, any examples of this being done are very small and unique. There is not (yet?) any general trend toward IPP creation of generation resources for the purpose of export.

<sup>5</sup> Currently, the standard Electricity Purchase Agreement between BC Hydro and IPPs requires the IPP to deliver all of the plant’s power to BC Hydro.

<sup>6</sup> Paragraph 6(b)(iv) of the Terms of Reference state that in making the assessment under s.3 and the determinations under s.4 the Commission, *inter alia*, recognize and take into account that “it is desirable to support the most efficient use of generation resources from a Province-wide perspective...” Perhaps this refers to idle or under-utilized self-generation.

- Developing technologies and their impacts on the economics of generation may be considered, especially as this may affect renewable generation from wind, solar, wood waste or tidal resources.

This list should be expanded to include geothermal, wave and kinetic hydro technologies. (Inclusion on the list does not imply that the economics will turn out to be favourable.)

9. In the fifth bullet under “In Scope” on p.2, Staff suggest that the scope should include “The need for generation resources resulting from both domestic and export demand.” [underline added] Presumably it was not the intention to imply that there would a *need* for generation resources to meet *export* demand. There is a *need* to meet *domestic* demand; and there are *opportunities* to develop generation resources to achieve potential exports. All development for export is discretionary.
10. At the bottom of p. 2, Staff suggest the production of “a viable number of resource options for each region.” It then provides “Examples of possible assumptions”. [underline added] Clarification of the term “assumptions” is required. In the context of section 3 of the Terms of Reference, it would seem that the listed examples include both *scenarios* (such as Site C proceeding – or not proceeding) and *assessments* (such as that a particular region within BC contains favourable wind generation potential).
11. Further, regarding the first two bulleted examples, “Wind emphasis -- regional generation favouring wind advantage” and “Run-of-river (RoR) emphasis – regional generation favouring RoR projects,” it would not be desirable to identify only one generation type per region (if that was the intention).

Rather, it would be preferable to develop a manageable number of generation scenarios defined in terms of technology, region and merit order, where the scenarios reflect realistic alternatives regarding technological performance, costs, transmission access, environmental and other considerations.

12. In the same discussion (bottom of p.2), Staff suggest a case in which “carbon sequestration from coal generation becomes cost-competitive.” While that outcome is hypothetically possible, it should not be assumed that the effect would necessarily be the development of coal-and-carbon-sequestration generation plants *within B.C.* Such plants would presumably be sited near coal mines, in areas with access to underground sequestration sites. Alberta, with its coal resources and depleted oil and gas fields, or other areas in the US Northwest might be first locations for these hypothetical clean-coal plants. If so, the effect of cost-effective carbon sequestration could be to undercut any large export market for BC renewable energy. This becomes a ‘little or no export’ case, which should certainly be considered in the generation scenarios.

### ***Assessment of Demand***

13. Under “Assessment of Demand” on p.3, Staff quote paragraphs from the Terms of Reference “that appear most applicable to demand forecasts.” There should be an ellipsis to

reflect the omission of ToR s.6(1)(ii) concerning avoidance of inefficient multiple transmission lines. Substantively, it does not appear that ToR s.6(1)(ii) is addressed in the *Discussion Draft* – it should be.

Also, it would help to avoid confusion if there was a consistent differentiation between “forecasts” and “scenarios.”

14. In the third bullet on the bottom of page 4, it should be clarified that consideration of scenarios reflecting “fuel switching to electricity as a greenhouse gas reduction strategy” and “regional long-term economic expansion” is mandatory, per the ToR s.7(c)(i) and (ii). BCSEA, *et al* suggest that the inquiry should also consider scenarios involving (i) greater reduction in domestic energy use due to increased efficiency and conservation than is forecasted in the utilities’ long-term acquisition plans, and (ii) large energy exports.

It should be clarified whether “fuel switching to electricity as a greenhouse gas reduction strategy” includes a transition to electric vehicles (which is fuel switching from gasoline and diesel to electricity).

Also, to confirm, BCSEA, *et al* understand “fuel switching to electricity as a greenhouse gas reduction strategy” to include, among other things, the use of electric heat pumps for space and water heating.

15. The last bullet on page 4 states:

- Reasonable forecasts of the province’s domestic long-term energy and capacity requirements, based on estimates of net domestic demand, after provincial self-sufficiency requirements and demand-side measures are taken into account, are in scope.

Without disagreeing with the apparent intention, it might be clearer to separate ‘net domestic demand after taking into account demand-side measures’ from provincial self-sufficiency requirements, since DSM *reduces* gross demand and the self-sufficiency requirement in effect *increases* the load required to be served.

16. At the top of page 5, Staff use the phrase “conservation technologies may reduce demand.” [underline added] This should read “conservation technologies *will* reduce demand.” Specifically, some scenarios should include *declining* domestic electric energy demand over at least the next two decades.

More generally, it should be noted that this bulleted paragraph refers to demand *scenarios*, not to demand *forecasts*.

17. In the first un-bulleted paragraph on p. 5, Staff suggest that “demand forecasts will be...disaggregated to show the demand at appropriate points in the study model.”

Presumably this refers to demand *scenarios*.

It is not clear what is meant by “appropriate points,” or “the study model.” Clarification would be appreciated. It would be useful if demand forecasts were disaggregated, *inter alia*, by geographic region.

18. Later in the same paragraph, Staff suggest that demand forecasts (scenarios?) would reflect “the long-term outlook for major industrial sectors such as forestry, mining, and oil and gas.” For a study of the nature of this transmission inquiry, the important point is that the range of demand scenarios reflect a reasonable range of future demand by major industrial sectors as a whole, and the range of plausible geographical distribution of industrial load.
19. Later in the same paragraph, Staff suggest that regionally differentiated demand forecasts would include “export estimates.” As discussed above, it should be noted that “exports” includes both economic trade opportunities and exports due to a hypothetical ‘generation for export’ policy. The latter is a Provincial policy choice that may be best dealt with by the use of scenarios. In any event, all forecasts should include estimates of export *potential*, rather than required exports.

Also, the reference to “export estimates at the interconnection points with Alberta and the U.S.” confirms BCSEA, *et al* understanding that the term “exports” includes both international and interprovincial exports.

20. At the bottom of page 5, Staff discuss exports in terms of “potential demand” for renewable and low-carbon generation. That point raises the issue of how much (geographically) of the United States should be considered to be a potential market for clean BC generation. The inquiry should attempt to assess the geographical range of such potential sales of energy and/or renewable-energy credits.
21. Last but not least under the heading of Assessment of Demand, it should be noted that there are two major ‘chicken and egg’ factors that must be dealt with in terms of assessing demand: (i) the potential electrical load that would only emerge if a new transmission line along Hwy 37 is built; and (ii) the potential electrical load from gas sector activities in the Horne River Basin that would only materialize if a new transmission line is built from the BC grid to the northeast. BCSEA, *et al* suggest that for both transmission line possibilities ‘built’ and ‘not built’ scenarios be assessed.

### ***Assessment of Transmission***

22. Under the heading “Assessment of Transmission” on p.6, Staff cites section 5 of the Terms of Reference, which sets out two points that the Commission may *not* consider in making the transmission determinations in s.4. Two comments:
  - Without trying to avoid the proscription against determinations regarding “the specific routing” of transmission lines, it would be useful for the Commission to identify and define some terms, such as “path” or “corridor,” that the Commission *will* consider in the proceeding.

- While the heading is “Assessment of Transmission” [underline added], the proscriptions regarding “specific routing or technological specifications of electricity transmission projects” applies to *determinations* not to assessments.
23. In addition, under the heading “Assessment of Transmission” on p.6 it would be appropriate to quote section 6(a)(ii) of the Terms of Reference:
6. In making the assessment under paragraph 3, and the determinations under paragraph 4, the Commission must:
    - (a) take a long-term view of transmission development, in which long-term needs are considered along with immediate needs, with the view to support: ...
      - (ii) an efficient development of transmission that would avoid multiple transmission lines when, for example, one appropriately sized transmission line would serve the need in the foreseeable future... [underline added]
24. Regarding the first three paragraphs under the heading “In Scope” on page 6, BCSEA, *et al* generally agree, and add the following comments:
- *Existing* (not just potential future) regionally significant transmission at less than 230 kV should be within the analysis of the transmission system.
  - Recognizing that the proscription regarding technical specifications applies to determinations, not to assessments, it may be clearer to refer, in the analysis but not in the determinations, to a transmission line’s kV size (where that is actually the appropriate unit of measurement) rather than using a transfer capacity in MW (except where path transfer capacity in MW is actually the appropriate unit of measurement).
25. At the top of page 7, Staff suggest a list of factors to be considered in the transmission analysis that does not include inappropriate areas. Also, under the heading “Areas Inappropriate for Generation Development” on page 9, it is said that “Staff note that the assessment of areas inappropriate for [generation] development is limited to **generation** resources, not transmission.”

BCSEA, *et al* strongly believe that the determinations on transmission should be supported by an assessment of, among other things, areas inappropriate for transmission development. The list of factors to be considered in the transmission analysis should include both legally protected areas and environmentally sensitive areas. This analysis would be at the same high level of generality as the rest of the inquiry analysis.

The whole of section 3 of the Terms of Reference applies only to the development of *generation* resources. Nothing in section 3 means that the inquiry must not or should not consider that there are areas inappropriate for the development of *transmission* resources. On the contrary, and recognizing that *determinations* by the Commission will not address

the *specific routing* of transmission projects, the inquiry can and should at least *assess* evidence that a “general (not specific) [transmission] path location” is not environmentally appropriate.

The preamble of the Terms of Reference states in part:

“WHEREAS a planned and rational expansion of the electricity transmission system that considers ... the desirability of minimizing impacts in supply these needs is in the best interest of British Columbians from a social, environmental and economic perspective” [underline added]

To use an extreme example, it would be inconsistent with the Terms of Reference as a whole for the Commission to end up making a determination in favour of a new transmission path that could only be achieved by bisecting an existing provincial park.

Putting it another way, a particular area would be inappropriate for the development of generation resources if there was no geographic way to achieve transmission access to the area without traversing areas that are inappropriate for generation development.

26. In the list on page 7, Staff refer to “component end-of-life date.” It is not clear whether Staff are referring to existing or potential new facilities, or what relevance the end of component life might have.
- The analysis might also note where transmission paths might follow existing transmission corridors (or even be developed by increasing the voltage or capacity on existing structures), to minimize cost and environmental effects.
  - The last point in the list mentions “timing of new additions.” Since this analysis would be highly conceptual, identifying specific timing would be inappropriate. The analysis might usefully estimate the lead time for development of transmission corridors, both from the beginning of design and permitting and from the date of major commitments (e.g., order of equipment).
  - The list of factors should also include the extent to which various transmission corridors would contribute to (or conversely avoid) a spider-web of transmission development in a manner that would increase environmental impact (ToR, s.6(a)(ii)).
  - It should be specified that this list of factors is not intended to be exclusive.
27. In the last paragraph on p.7, it is stated that “The Terms of Reference are silent on the issue of cost-allocation for transmission extensions or reinforcements identified by the Inquiry.” [underline added] With respect, that is not entirely correct. The ToR refer to private sector participation in funding the proposed Hwy 37 transmission line. Section 6(b)(viii) of the ToR states:
6. In making the assessment under paragraph 3, and the determinations under paragraph 4, the Commission must: ...

(b) recognize and take account of the following: ...

- (viii) Government has committed to transmission capacity north of Skeena substation extending to at least Bob Quinn Lake having a capacity of at least 287 kilovolts through partnership with the private sector to fund such transmission capacity. [underline added]

That said, BCSEA, *et al* await input from other parties before taking a position on whether the inquiry should address cost allocation issues.

28. Also on page 7, Staff state that “participants shouldn’t assume that a determination on need implies a determination on cost-allocation.” [underline added] This wording could be taken to imply that the outcome of the inquiry will necessarily include determinations on the “need” for transmission line reinforcements or additions. BCSEA, *et al* question whether the inquiry will include analysis that is detailed enough to lead to determinations on “need” even at the “general (not specific) path” level. BCSEA, *et al* suggest that at this early stage in the inquiry there be no commitment that the outcome will necessarily include “need” determinations.
29. Last but not least regarding Assessment of Transmission, the scoping decision should address the topic of transmission infrastructure built by outfits other than the “transmission service providers” (defined in the ToR, s.1, as BCTC and FortisBC.) This would include existing transmission operators, such as Teck Cominco, and would-be transmission operators such as Sea Breeze.

### ***First Nations Issues***

30. Regarding the text under the heading “First Nations Issues:” on pages 7-8, the text acknowledges a request by a First Nation that the Inquiry address historical infringements of aboriginal rights and title resulting from transmission lines within First Nations’ traditional territories. The following paragraph concludes that “...the Inquiry Report will provide an opportunity to summarize the concerns and ideas raised by First Nations.” While BCSEA, *et al* expect First Nations participants to take the lead on this topic, BCSEA, *et al* do note that the *Discussion Draft* appears not to respond to the request that the inquiry address historical infringements.
31. BCSEA, *et al* also note that the *Discussion Draft* summarizes BC Hydro/BCTC’s proposed three phase aboriginal consultation process leading to BC Hydro/BCTC filing a final (second) consultation report with the Commission. However, the Discussion Draft does not address whether the scope of the inquiry includes an evaluation and decision by the Commission regarding whether BC Hydro/BCTC have satisfactorily met any obligation to consult and if necessary accommodate First Nations regarding potential infringements of aboriginal rights and title associated with Crown decision-making regarding the topics of the inquiry.

### *Areas Inappropriate for Generation Development*

32. Under the heading “Areas Inappropriate for Generation Development,” the *Discussion Draft* identifies two general categories of ‘areas inappropriate for generation development’: exclusion areas<sup>7</sup> and avoidance areas.<sup>8</sup> BCSEA, *et al* accept these two general categories. However, they would describe them in broader terms than are used in the Discussion Draft.
- ‘Exclusion areas’ – areas where new generation is prohibited or severely constrained – should include, in addition to the examples in the *Discussion Draft*, areas identified within completed Land and Resource Management Plans (LRMPs) and other landscape level plans that are incompatible with new generation.
  - BCSEA, *et al* support the concept of the inquiry identifying ‘avoidance areas.’ The Terms of Reference *require* the Commission to consider ‘areas inappropriate’ in addition to parks and protected areas.
  - BCSEA, *et al* support the suggestion to include in ‘avoidance areas’ “areas where prolonged review by permitting agencies can be anticipated, due to significant ecological, traditional use, or cultural values.” This concept of last-resort development areas is very important and should be referenced at all points in the analysis.
  - ‘Avoidance areas’ should be described as areas where new generation should be deferred or avoided. The Inquiry has a planning period of thirty years, so the qualifier “based on imminent government decisions”<sup>9</sup> would be too restrictive.
  - While B.C.’s submissions to the Western Renewable Energy Zone (WREZ) process regarding exclusion areas will be a useful source of information for the Commission, they will not be sufficient. The Commission’s legal mandate for the Inquiry is more specific than the objectives of the non-legislated WREZ process. BCSEA, *et al* read the Terms of Reference, s.5(a)(iii) in particular, as requiring the Commission to conduct its own assessment of generation resources in B.C., thereby precluding sole reliance on the Province’s submissions to WREZ.
  - Some generation options should be left out of the analysis, due to the environmental effects of the development or operation of that generation option in that area. Other generation options should be excluded due to the lack of viable transmission corridors, given environmental constraints.
  - Environmental set-asides should include protection of wildlife habitat, fisheries and migration routes, preservation of natural road-less sites, and aesthetic considerations.

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<sup>7</sup> Discussion Draft, p.9, para.2.

<sup>8</sup> Discussion Draft, p.9, para.3.

<sup>9</sup> *Ibid.*, underline added.

- Even where some generation may be acceptable in an area, the analysis should recognize that the full technical potential in any particular region is unlikely to be developed, due to localized environmental constraints.

***Conclusion***

BCSEA, *et al* appreciate this opportunity to provide input into the Commission's scoping decision and look forward to participating in the June 18 workshop and the June 24 procedural conference.

Yours truly,

William J. Andrews

A handwritten signature in black ink, appearing to read 'W. J. Andrews', with a horizontal line extending to the right from the bottom of the signature.

Barrister & Solicitor

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