

**IN THE MATTER OF the *Utilities Commission Act*, R.S.B.C. 1996, Chapter 473 and An Application by the BC Hydro and Power Authority for a Certificate of Public Convenience and Necessity for the Dawson Creek/Chetwynd Area Transmission Project.**

**Project No. 3698640/Order G-132-11**

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**WRITTEN SUBMISSION ON BEHALF OF  
GARY AND MARILYN ROBINSON**

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The application filed by BC Hydro for the Dawson Creek/Chetwynd Area Transmission Project discusses the proposed Bear Mountain Terminal ("BMT") at pages 4-19 to 4-21. Two options are presented. My clients, the Robinsons, are opposed to the Site 1 Option which would be on their land. BC Hydro did not disclose in the application that the Robinsons were opposed to the Site 1 Option.

On December 16, 2011, I submitted an Information Request (no. 2) on behalf of the Robinsons asking BC Hydro to provide our office with all the reports and studies it had conducted in determining the suitability of each of these proposed options, and comparisons between them. Any such studies and reports would have had to pre-date the application. No such studies or reports were produced by BC Hydro. Rather, in its Information Response, BC Hydro simply provided a narrative and stated in an "Evaluation Summary" on page 9:

*Therefore, Option 1 is selected as the preferred layout option for the BMT expansion because of the reduced cost, minimal land requirements, and reduced construction risk.*

BC Hydro did not consider the adverse impact Option 1 would have on the Robinsons' enjoyment of their property.

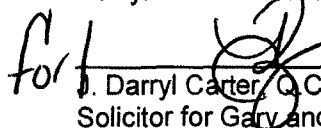
On May 8, 2012, I advised the Commission that on page 7 of its Reasons for Decision dated May 7, 2012 it had missed a very significant issue, i.e. the siting of the proposed Bear Mountain Terminal expansion. Commission counsel telephoned me on May 10, 2012 to say that the Panel wanted him to assure me that this issue was still within the scope of the proceedings.

When I received BC Hydro's Written Submission dated July 24, 2012 I could not see where the issue of the siting of the Bear Mountain Terminal expansion had been addressed.

On behalf of the Robinsons, I request the Commission to carefully consider their Statement of Evidence filed on May 15, 2012. We are requesting a ruling by the Commission that Site Option 1 not be approved for the Bear Mountain Terminal expansion. BC Hydro has not taken the Robinsons' concerns fully into account and no good reason has been given for the Bear Mountain Terminal expansion to be located on the Robinsons' land.

All of which is respectfully submitted this 30<sup>th</sup> day of July, 2012.

Darryl Carter & Company

*for*  \_\_\_\_\_  
D. Darryl Carter, Q.C.  
Solicitor for Gary and Marilyn Robinson

