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**Subject:** Written Argument, John Hague, re: Duke Point Power Plant



JHague-Argu\_EPA.  
doc (75 KB)

Attached is my argument in a Word file. I cannot send in Acrobat.  
Please let me know if it does not download for you.

J Hague.

TO:

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**John Hague, CA - Commercial Mediator**  
**Argument, Friday, February 4, 2005**  
**Before the British Columbia Utilities Commission**  
**In the Matter of the Utilities Commission Act**  
**S.B.C. 1006, Chapter 473**  
**And**  
**British Columbia Hydro and Power Authority**  
**Call for Tenders for Capacity on Vancouver Island**  
**Review of Electricity Purchase Agreement**

**Abstract**

My argument identifies fatal flaws in government policy, law, regulatory process, and analysis that taken together or apart cause this proceeding to be incapable of leading to a fair, just and reasonable Decision in the Public Interest.

**Government Policy**

The Provincial Government's November 2002 energy policy, "Energy For Our Future: A Plan For BC" ("Energy Plan") is just that, a plan and nothing more. It is a plan that was created without due process and in no way stands as legislation. A plan is a framework that is preferred by some, in this case the Liberal Party of BC in Government. No single item in that plan has been legislated into existence. The fact that the plan is, in and of itself, fatally flawed is not irrelevant to this argument. Government has, by its promulgation of its "Climate Change Plan" created an obvious conflict between greenhouse gas reduction and fossil fuel based energy production. The fact that the "Climate Change Plan" cites the "Energy Plan" as its first action item is not lost on anyone who takes Kyoto Protocol seriously. There is nothing in either the Energy Plan or the Climate Change Plan that specifically suggests "on island generation" to satisfy the peaking capacity short-term shortfall on Vancouver Island that will be mitigated soon with a 230 kVa transmission line.

References:

Climate Change in B.C.

<http://wlapwww.gov.bc.ca/air/climate/>

Energy Policy in B.C.

<http://www.gov.bc.ca/em/popt/energyplan.htm>

Climate Change and Energy Policy Critique [http://www.davidsuzuki.org/Climate\\_Change/BC/Energy.asp](http://www.davidsuzuki.org/Climate_Change/BC/Energy.asp)

## **Law - The Utilities Commission Act**

Nowhere in the amended Utilities Commission Act do the words appear that provides the Commission “a mandate to implement the policy actions of the Provincial Government’s November 2002 energy policy, “Energy For Our Future: A Plan For BC”. Section 45 has no such wording. And no such wording existed prior to the December 2003 amendments that the Commission refers to. There is no Order In Council that directs the Commission to “implement the policy actions of the Energy Plan. There is no other law that expressly provides that authority to the Commission. The whole idea of there being such a law is contrary to the “regulatory compact” made between exclusive natural monopoly franchisees and the public interest as expressed through regulatory process. Government is not empowered to simply assemble a plan and require its implementation through an administrative law procedure. If this is law, it is bad law and must be struck down.

Reference: <http://www.bcuc.com>

### **“PURPOSE AND SCOPE OF THE RESOURCE PLANNING GUIDELINES**

*Issued: December 2003*

The Commission’s mandate to direct and evaluate the resource plans of energy utilities is intended to facilitate the cost-effective delivery of secure and reliable energy services. The Resource Planning Guidelines (the “Guidelines”) outline a comprehensive process to assist the development of such plans.

The Utilities Commission Act (“UCA”) was amended in 2003 to provide the Commission with a mandate to implement the policy actions of the Provincial Government’s November 2002 energy policy, “Energy For Our Future: A Plan For BC” (“Energy Plan”). Amendments to Section 45 of the UCA expand upon and clarify the planning requirements of utilities and the Commission’s role to review filed plans to determine whether expenditures are in the public interest and whether associated rate changes are necessary and appropriate.

The additions [amendments] to Section 45 of the UCA are as follows:

45 (6.1) A public utility must file the following plans with the commission in the form and at the times required by the commission;

(a) a plan of the capital expenditures the public utility anticipates making over the period specified by the commission;

(b) a plan of how the public utility intends to meet the demand for energy by acquiring energy from other persons, and the expenditures required for that purpose;

(c) a plan of how the public utility intends to reduce the demand for energy and the expenditures required for that purpose.

(6.2) After receipt of a plan filed under subsection (6.1), the commission may:

(a) establish a process to review all or part of the plan and to consider the proposed expenditures referred to in the plan;

(a) determine that any expenditure referred to in the plan is, or is not at that time, in the interests of persons within British Columbia who receive, or who may receive, service from the public utility, and

(b) determine the manner in which expenditures referred to in the plan can be recovered in rates.

On the basis of subsection 6.1, the Commission will require that any resource plans filed under paragraph 6.1, (a), (b) and (c) be prepared in accordance with the Guidelines.

The Commission requires consideration of all known resources for meeting the demand for a utility’s product, including those which focus on traditional and alternative supply sources (including “BC Clean

Electricity” as referred to in the Energy Plan), and those which focus on conservation of energy and Demand Side Management (“DSM”).<sup>1</sup> Resource planning is intended to facilitate the selection of cost-effective resources that yield the best overall outcome of expected impacts and risks for ratepayers over the long run. The process aids in defining and assessing market-based costs and benefits, while also entailing the assessment of tradeoffs between other expected impacts that may vary across alternative resource portfolios. Such impacts may be associated with objectives such as reliability, security of supply, rate stability and risk mitigation, or specific social or environmental impacts. In sum, a resource planning process that assesses multiple objectives and the tradeoffs between alternative resource portfolios is key to the development of a cost-effective resource plan for meeting demand for a utility’s service.

In most circumstances, Certificates of Public Convenience and Necessity (“CPCN”) applications should be supported by resource plans filed pursuant to Section 45 of the UCA. The Commission expects that resource plans will help facilitate the review of utility revenue requirements and rate applications.

The Guidelines do not alter the fundamental regulatory relationship between the utilities and the Commission. The Guidelines do not mandate a specific outcome to the planning process, nor do they mandate specific investment decisions. The Guidelines provide general guidance regarding Commission expectations of the process and methods for utilities to follow in developing plans that reflect their specific circumstances. More specific directions regarding resource plans will be provided to utilities on a utility to utility basis. Further directions may address issues regarding the elements of the resource plan or the underlying methodology. The Commission will review resource plans in the context of the unique circumstances of the utility in question. For this reason, the Guidelines do not distinguish between the circumstances of small and large utilities or between transmission and distribution utilities, nor do they prescribe specific planning horizons or approaches to resource acquisition. Although the Guidelines are not prescriptive in that sense, after review of a resource plan the Commission expects to be prescriptive on a utility by utility basis, as necessary, to facilitate cost-effective delivery of a reliable and secure supply that meets demand for a utility’s service.”

## **Regulatory Process**

### **The BCUC Decision of September 2003 Vancouver Island Gas Pipeline**

I argue that the following portions of the Commission’s previous Decision are beyond the jurisdiction granted the Commission in the Utilities Commission Act.

Even if the December 2003 changes to the Act do stand the tests under appeal, the fact remains that a Decision dated September 2003 pre-dated those changes that are alluded to by the Commission. In addition the following “micro-management” flies in the face of a previous BC Court of Appeal Decision. Commonly referred to the “Goldie Decision”, BC Hydro successfully argued that the detailed directions of the BC Utilities Commission regarding public participation in the creation of its “Integrated Resource Plan” attempted to usurp management’s authority under the BC Hydro Authority Act. Interestingly, BC Hydro did not seek relief in the BC Court of Appeals for this September 30 incursion.

The following directions in the September 30, 2003 prejudice the current proceeding. These specific directions about a future Application of a utility under the Commission’s regulatory authority are without precedent. And

the implication that the Commission is empowered to create energy policy is utterly without support in the Utilities Commission Act as at September 30, 2003 or at December 2003. To the extent that the following directions found their way into BC Hydro’s call for tenders causes that process to be tainted and prejudicial.

## **“9.1 Introduction**

In Chapter 4, the Commission Panel confirmed that there will be a future capacity shortfall on Vancouver Island. Although the Commission Panel has found that the need for new supply resources is approximately 100 MW less than BC Hydro's forecast for 2007/08, there is a need to move expeditiously to reinforce electricity supply to Vancouver Island prior to the winter of 2007/08. **The evidence in this hearing suggests that the appropriate next resource addition should be on-Island generation [emphasis added]**, provided the costs of the proponents' projects can be confirmed near their expected values. BC Hydro recognizes that it has the responsibility to ensure reliable supply at reasonable cost to all its customers, and the Utility has been pro-active in addressing the Vancouver Island problem since the mid-1990s. The denial of a CPCN for VIGP is a result of the Commission Panel being unable to find that VIGP is the most cost-effective solution to the problem at hand. The future reliability concerns remain and the Chapter 7 of this Decision discusses the strengths and limitations of BC Hydro's portfolio analysis. The Commission Panel has also addressed the concerns of some intervenors that the model is a black box which is not sufficiently transparent to allow examination and verification. However, **given the Commission Panel's determination that the logical next resource addition is on-Island generation**, [emphasis added] it should be possible to develop a simplified NPV model specifically for the CFT. The NPV model should be available to bidders in advance and *the Commission Panel believes it could be limited to on-Island generation costs, without the need to consider future impacts to electricity transmission or generation on the Mainland*. [emphasis added]

The CFT Benchmark should be VIGP with GSX. In Chapter 5, the Commission Panel recognized that there remains considerable uncertainty in the costs of VIGP, and developed two plausible scenarios to cover the likely range of the cost of electricity from VIGP. For a CFT Benchmark that is consistent with the likely range of VIEC costs for VIGP and provides a valid comparison for generation projects advanced by other proponents, the Commission Panel suggests that BC Hydro calculate the CFT Benchmark based on the following inputs to the NPV model used for the CFT:

- Utilization rate - 77.5 percent;
- GSX costs - 50 percent of updated GSX toll, without adjustment for GSX sunk costs;
- TGV charges - \$0.60/GJ on-Island toll;
- Gas commodity costs - annual average of BC Hydro's reference and high forecast gas prices;
- Motor fuel tax - 7 percent of gas commodity cost;
- Greenhouse gas costs - \$3.60/MWh in real 2002 dollars;
- Capital cost - average of the P50 and P90 estimates, less VIGP sunk cost;
- Capital structure - 80/20 debt/equity ratio;
- Debt interest rate - BC Hydro's current cost of long-term debt;
- Return on equity - based on Special Direction Number 8; and
- OMA costs - VIEC estimate."

## Analysis: Context

BC Hydro, Terasen Gas, Duke Pt. Power and others, are before the BC Utilities Commission seeking permission to enter into energy supply contracts involving the construction and operation of a 250 MW gas fired combined cycle combustion turbine generating station on Duke Point, nearby Nanaimo. To supply the peaking gas required Terasen is also before the BCUC seeking approval for an LNG plant to be sited in [the Mt. Hayes area of the Cowichan Valley, near Ladysmith](#)

And the GSX (Georgia Strait Gas Pipeline Crossing Project) gang is still hanging around hoping that somehow the Duke Pt. project will open the door to their pipeline project that already has NEB and US regulatory approvals. [But concerned citizens in two NW Wash. counties recently managed to get the US approval overturned. Once the BCUC nixed VIGP, they successfully argued in an appeal that the pipeline wasn't necessary for VI and also it didn't serve US interests.](#)

My view is that if these dominos cascade, the next thing we will see is Terasen applying for the extension of their Southern Crossing transmission line from Oliver to Huntingdon with the argument that gas supply and price security justify the spending.. All of these investments will be made obsolete, that is, redundant with the arrival in 2010 or sooner of the new submarine electric power transmission supply to Vancouver Island. . Because then the entire provincial energy conservation and renewable energy potential will be available to secure the needs of Vancouver Island's growing demand. [These potentials are available now but constrained by the short remaining service life of one or more submarine cables.](#) To date the huge investment in transmission and distribution of natural gas on Vancouver Island has created an accumulated loss in excess of \$100 million, hardly an argument in support of even more natural gas infrastructure there.

So it is possible that this plant is the first in a cascade of dominos that could wind up costing British Columbians' \$1.5 Billion not counting the rising cost of natural gas. Compare this to a scenario where we solve the near-term peaking problem on Vancouver Island with load shifting, load management, load shedding, load conservation and alternative energy supply on Vancouver Island.

The presumed [stated](#) reason for the project is a short-run deficit of peaking capacity that may hit the Vancouver Island region in the fall of 2007. Rather than creating a "bridging strategy" at minimal cost that will see us through 2008-09 and the arrival of a 230-kVa-electricity transmission line from the mainland to replace the currently failing submarine lines, the "players" are leading us down a clearly non-sustainable path that could represent the most expensive energy ever supplied to BC in its entire successful history of electricity generation. In my view this Duke Pt. plan will not be sustainable even in economic terms and represents as serious a threat to our economic stability as the Site C dam proposed in 1982 which is still not needed even today.

What is truly amazing is that BC Hydro together with Power Smart and BC Hydro Transmission Company has not proposed a "bridging strategy" of their own. My intuition tells me that at the heart of BC Hydro there are engineers, planners and marketers that know exactly how to solve this "time gap" problem and save BC from a \$4.5 Billion energy mistake. Why don't we hear from them? Because it is [not](#) worth their careers to disagree with the Liberal adoption of an NDP pink elephant.

It must be noted that the BC Utilities Commission heard an application for

this project already, when it was BC Hydro who would build, own and operate the plant. Now, according to Liberal energy policy, a private company will own and operate the plant and bill BC Hydro for the service. BC Hydro will supply the natural gas needed at its risk of supply and price - that's you and me. (Please refer to the testimony of Dr. Mark Jaccard regarding the likelihood of green house gas liability charges being levied on natural gas and "low balled" by BC Hydro. The BCUC turned down the original Application a year or so ago, now its back in a slightly different coat - just as uneconomic as ever, but we have now lost yet another year of "bridge strategy" opportunity.

This province currently has a debt of some \$30 Billion. How did it grow to be so high? A large part of the answer lies in the negligent waste of repeated Government boondoggles. You cannot waste this kind of money and expect a sustainable, healthy, prosperous community.

I agree with the estimate of the potential waste of the "Duke Pt. - Bridge Too Far" in the neighborhood of \$4.5 Billion. At least this much, because it does not include the "opportunity cost" of using the \$ Billions in a much more sustainable way, such as the development of "firm green power" from integrated systems employing combinations of wind, solar, tidal and the production of hydrogen. Remember WAC Bennett? BCHydro was his vision of an engine of the BC economy. It could be true today, if we can get off the notion that fossil fuels represent sustainable energy. This is a notion that only the dinosaurs would support, and they are welcome to it.

There are many qualified and deeply concerned intervenors and skeptics in the BCUC proceeding. Together, this group might be able to cobble together a bridging strategy so compelling that it will easily replace the Duke Pt. proposition. [BCH engineers are quite capable of doing this, and would dearly love to do so. They just need to be unfettered and given the green light to do so.](#)

### **Analysis: Fatal Flaws**

BC Hydro, during the 1985 to 1995 period was a world leader in energy conservation. Utilities from around the world would come to visit and learn. They would visit us at the BCUC to find out how we managed to encourage BC Hydro to go this route. We just let them do their job, part of which was to avoid construction of the Site "C" dam on the Peace River.

The "fit" between conservation, other "firm" green power, and our existing reservoirs is an opportunity to not only meet our own needs, but to create surplus power and systems that we can earn export money from. The value of "firm green power" must be recognized. Consider the value of such systems expertise to the Chinese!

Why are we even considering a fossil-fueled electric generator? For the incidental capacity? For the energy? This is the "fatal flaw" in BC Hydro's argument. The most cost effective solutions come in two steps, the first is the bridge to the in service date for the new ( and subsequent transmission cables), the second is (with the cable in service) a plethora of solutions for energy supply options drawn from the entire provincial resource potential. The pre-condition that a solution to the capacity shortfall must be "on Island generation" is a policy statement that the BCUC does not have the jurisdictional authority to require. If the BCUC is relying upon the December 2003 changes to its own "Resource Planning Guidelines", it is on very thin ice indeed.

As I have argued before, the only parties that will "benefit" from Duke Pt. Power are 1. Government royalties on natural gas. 2. BC Hydro gets to "build" something conventional. 3. Terasen Gas gets to build

additional rate base. Meantime, customers bear the full risk of obvious capital investment mistakes and the concurrent natural gas supply cost risk.

The only source of "logic" for this scheme is found in the Government's Energy Policy, which is over dependant upon fossil fuels. Short term "gain" for long term pain. Just like the mistakes already made in the damage done to our social infrastructure, this approach to energy is due to the myopic world-view of our current government. A one-dimensional view of the world can only end in catastrophe. The fact that better alternatives are apparent to everyone, just makes the "bias" in this proceeding that much harder to swallow.

The clearly stated problem is the probable gap in transmission line capacity between the "end of the service life" of an existing transmission line and its replacement. The "gap" in this case appears to be 3 or perhaps 4 years. This is not news to anybody attending the hearing.

So, the problem can be restated that we need to find a safe, reliable and affordable alternative way of providing between 3 and maybe 4 years of peak load capacity to mitigate the shortfall.

Nowhere in the logic does the problem of energy supply arise. We have plenty of energy and plenty of energy substitutes. What we do not have with certainty, is a currently available resource to resolve the peak load capacity shortfall of around 250 mW for a 3 to 4 year time frame, after which the replacement 230kVa line will be in service. This problem is all about a short-run capacity shortfall. It is not about energy generation or the need to explore the development of combined cycle gas combustion turbines.

Any economic feasibility test must be addressed in terms of the value of the benefit, that is, 3 -4 years of 250mW capacity and the costs to ratepayers to pay for that solution. Viewed in this relevant perspective, there is no possible way that the Pristine Duke Power Plant Purchase Agreement could prove to be the low cost solution. To contrive energy shortfall problem out of a short-run deficit in peaking capacity is to demonstrate the most fundamental lack of understanding of what is the true nature of the real need. The feasibility models that have been used have all assumed that the problem is a long-term shortfall in energy generation. That evidence is worthless.

The logic of this project is fatally flawed, partly because it flows from the governments own fatally flawed energy policy, but mainly because it is flawed in and of it. The problem is a short-run, short-fall in our ability to transmit electricity to Vancouver Island. A problem to which an appropriate long-run solution is in the works and all we really need is a temporary "bridge" to get us there. Once there, the revitalized transmission resource will make all the resources in our energy rich Province available to meet Vancouver Island's energy needs. And if the remaining transmission cables need replacement, that project, or some other transmission solution, will be planned for in a timely fashion. The economic analysis done by BC Hydro merits an "F". The reasons it fails are that it ignores the real problem and the short-run duration of the real problem and it ignores the fact that, when the new transmission line is in service, Vancouver Island will have renewed access to all of BC's energy resources - firm green and otherwise. The inclusion of the long-run energy "benefits" of the Duke Pt. capacity "solution" while excluding province-wide energy alternatives is a fatal flaw in the analysis, rendering it worse than useless. And if all that was not enough, the unrealistic assumptions about the future cost of natural gas commodity prices and green house gas levies, leaves us with no proof at all that the Duke Pt. project is economically viable, let alone the least cost alternative. I really don't care that the analysis fits with the stated energy policy of government, which itself is in direct contradiction of governments own recently released climate change plan. Good analysis attempts to model the



real world, not the political one. We are left with, at the end of the day, no analysis that accurately portrays the net benefit/cost. The evidence at this point cannot satisfy the BCUC's requirement that the CFT has provided a better cost performance result than the proposition that was disallowed on September 30, 2005.

The analysis needs to be re-done in two parts. The first part would be a net present value, using say five years time frame to assess the capacity resource alternatives. The second part would assume the 230 kVa transmission line in service and would include an assessment of energy resource alternatives, expressed in net present value ( levelized unit costs ). Mixing and matching the short-run and long run alternatives will yield the best combination of capacity and energy to meet Vancouver Island's needs.

There is no possibility on either a factual or legal basis for any conclusion that this Duke Pt. Plant will serve the people of BC with what it is they need at a cost that is fair, just and reasonable, the current Liberal energy policy notwithstanding. The man came to the tailor for a new jacket, not a pair of shoes.

## **Chronology as I saw it unfold**

1. Sept. 30, 2003 BCUC does the right and the wrong thing in its Decision. They got the big question right but set up the subsequent process with several prejudicial remarks and directions.
2. December 30, 2003 The Utilities Commission Act is amended in section 45 the "Certificate of Public Convenience and Necessity" and along with that change, the BCUC amends its "Integrated Resource Planning Guidelines (to Utilities)" by renaming the guidelines as simply "Resource Planning Guidelines". ( Take the Progressive out of Progressive Conservative! )
3. The "Resource Planning Guidelines" as amended, now refer specifically, in the preamble to the relevance of the Government's stated energy policy, and names the Richard Neufeld Energy Policy of the Liberal Government by its exact name. Call it what you like, but I call this energy policy a fatally flawed fossil fuel dinosaur.
4. The CFT with prejudicial terms of reference is issued for "generation on the Island" to solve the transmission capacity short-term, shortfall. Capacity only providers are left out.
5. BC Hydro's Power Smart and Transmission subsidiary do not bid in response to the CFT.
6. And, predictably, the Duke Pt. Power Plant is back on the front burner.
7. I cross-examined the load forecasting, planning and resource systems panel of BC Hydro. The record clearly and unambiguously says, at Transcript Vol. 6, page 1076, lines 5-10, in the words of BC Hydros counsel, that the BC Hydro load forecast was not the determining factor in its promotion of the Duke Pt "solution", but rather it was the BCUC direction that made it so.
8. In the past, when the BC Hydro took serious exception to the BCUC "micro managing" its affairs, it took its case to the BC Court of Appeal, and, in the "Integrated Resource Planning Decision - the so called "Goldie Decision", BC Hydro won its argument.
9. I attempted to cross BC Hydro witnesses on this avenue that they could have taken to object to the BCUC usurping their planning process and in fact, micro managing. Their counsel rose to his feet, and the Chair agreed that I was making argument and to "move on". I was asking hard questions, that the two principal proponents simply did not like. The BCUC claims to be the implementer of government's stated energy policy and yet questions that impinge upon policy are cut-off.

So much for stated policy. The same year that the "Energy Council of BC" produced its report on sustainable energy development for BC, and was summarily eliminated by then Premier Glen Clarke, was the year that the NDP first advocated the "Duke Pt. Power Project". You could hardly expect Richard Neufeld, as Energy Minister to miss an opportunity to endear himself to his constituents once he gained power.

I suspect that the current government instructed the BCUC, in the spirit of its Energy Policy, to direct BC Hydro in the ways that it did, and BC Hydro was in the easy position of simply obeying its political and regulatory masters. Much easier for BC Hydro to go along with a dumb idea than to go to the BC Court of Appeal as it had in the past for similar reasons.

During my cross examination, I reconfirmed that the real problem is just as it appears, the "capacity gap" until the 230 kVa line is in service. So I asked BC Hydro why then did they not do all of their economic , benefit/cost analysis within the 3-4 year time frame relevant to this problem. Their answer was that the Duke Pt. Project has long-run benefits that need to be factored in. Their argument being that Vancouver Island will need to develop "on island" generation to meet its future demand ( or to replace the other submarine

transmission cables ). This is the boldest deception I have ever witnessed during all my years serving the people of BC as a senior staff analyst with the BCUC. The truth is, that when the 230 kVa line is in service, the entire generation, conservation, firm green potential of the entire province becomes available to satisfy Vancouver Island's need for energy. Those benefits have not been factored into the benefit cost equation that BC Hydro has done.

Personally, I am deeply embarrassed for the blatant manipulation, misinformation and distortion of accepted economic evaluation methodology that has been conducted by BC Hydro with the apparent involvement of the BCUC, as proponent of stated Liberal Energy Policy. And don't forget the complicity of Terasen Gas - they really do want to "build more rate base", and cannot see beyond their own pecuniary interest to their statutory duty to serve the public interest.

## **Conclusion**

It is a sad day when the single largest issue addressed in a BCUC proceeding is its own process and behavior. It is even a sadder day when the BCUC ignores the obvious and absolves itself from an "apprehension of bias". And it is sadder still when the BCUC knowingly leaves a resolution of this matter to the BC Court of Appeal and, by default, to the political process that is now underway leading to a May 17 provincial general election.

Perhaps that is the most just path for this politically driven project. It does deserve to wind up in the laps of the politicians responsible for advocating this clearly inappropriate project based upon a fatally flawed stated energy policy. Regardless the wording of the BCUC's "Resource Planning Guidelines" stated government energy or any other stated government policy in and of itself is not a law that must be obeyed. Neither BCUC or BCHydro are obligated to "go along". They are only obligated to serve the public interest as stated in the laws that give them their respective mandates.

## **Green Party letter to the Utilities Commission on Duke Point**

Tuesday January 18, 2005

BC Utilities Commission  
Rob Pellatt, Commission Secretary  
Sent by email: [commission.secretary@bcuc.com](mailto:commission.secretary@bcuc.com)

Dear Mr. Pellatt,

As leader of the Green Party of British Columbia, I want to reiterate my party's strong opposition to the proposed Duke Point Power gas-fired power plant.

Approval of this fossil fuel-burning mega-plant is unconscionable when there are economically feasible, renewable energy-based alternatives that can produce the needed electricity without increasing our output of greenhouse gasses.

Wind, solar, tidal and small-scale in-stream hydro projects are half the answer to meeting Vancouver Island's energy needs. The other half of the solution is conservation of energy which is now wastefully being squandered and the use of "green" heating technologies like solar hot water and geo-exchange systems. These conservation and renewable energy-based alternatives are more economically viable, environmentally responsible and sustainable over the long term.

Canada has signed on to the international Kyoto Accord, committing Canadians to reduce the level of CO2 emissions to 10 percent below our 1990 levels. We are already 30 percent above this level.

We will never reach the Kyoto goal, nor slow global warming, if the BC Utilities Commission caves into the pressure from BC Hydro to approve this project.

You have a moral obligation, if not a legal one, to take steps to meet Canada's commitment to reduce the use of fossil fuels and help curb global warming.

I implore you to do the right thing and reject this project again. Future generations are counting on you.

Sincerely,  
Adriane Carr  
Leader of the Green Party of BC

cc: Premier Gordon Campbell, [gordon.campbell.mla@leg.bc.ca](mailto:gordon.campbell.mla@leg.bc.ca)  
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John Hague, CA - Commercial Mediator

Nature - People - Business,  
in Harmony for Healthy, Prosperous and Sustainable British Columbia  
Communities!

<http://groups.msn.com/DeltaGreens> :: <http://www.greenparty.bc.ca>

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