

**BRITISH COLUMBIA UTILITIES COMMISSION**  
**IN THE MATTER OF THE *UTILITIES COMMISSION ACT***  
**R.S.B.C. 1996, Chapter 473**

**and**

**Re British Columbia Transmission Corporation**  
**Project No. 3798395/Order No. G-70-05**  
**Certificate of Public Convenience and Necessity Application**  
**Vancouver Island Transmission Reinforcement Project**

**NOTICE OF MOTION**

**TO:** COMMISSION SECRETARY

**AND TO:** COMMISSION COUNSEL

**AND TO:** BRITISH COLUMBIA TRANSMISSION CORPORATION  
**AND TO:** THEIR SOLICITORS

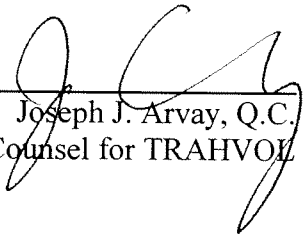
**AND TO:** ALL INTERVENORS  
**AND TO:** THEIR SOLICITORS

TAKE NOTICE that the Tsawwassen Residents Against Higher Voltage Overhead Lines Society ("TRAHVOL") will apply at 1:00 p.m. or so soon thereafter as counsel may be heard on Tuesday the 30<sup>th</sup> day of May, 2006 for an order that the record be re-opened to include the following:

1. Electronic mail Message dated April 12, 2006, which is attached as Appendix A to the Final Argument of TRAHVOL, dated April 19, 2006;
2. Electronic Newspaper Article dated April 26, 2006, which is attached as Appendix A to the Reply Argument of TRAHVOL to the Intervenors, dated April 26, 2006; and
3. Letter dated May 12, 2006 from Joseph J. Arvay Q.C. to Robert Pellatt, Commission Secretary, with enclosures.

AND TAKE NOTICE that TRAHVOL will rely on the attached submissions in support of this motion.

Dated at Vancouver this 29<sup>th</sup> day of May, 2006

  
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Joseph J. Arvay, Q.C.  
Counsel for TRAHVOL

**BRITISH COLUMBIA UTILITIES COMMISSION**  
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**Submissions of the Tsawwassen Residents Against**  
**Higher Voltage Overhead Lines Society (“TRAHVOL”)**  
**In Support of Motion to Re-Open the Record**

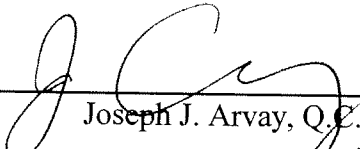
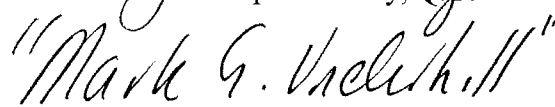
**May 29, 2006**

1. The Tsawwassen Residents Against Higher Voltage Overhead Lines Society (“TRAHVOL”) seeks leave to re-open the record to include the following evidence:
  - (a) Electronic mail Message dated April 12, 2006, which is attached as Appendix A to the Final Argument of TRAHVOL, dated April 19, 2006;
  - (b) Electronic Newspaper Article dated April 26, 2006, which is attached as Appendix A to the Reply Argument of TRAHVOL to the Intervenors, dated April 26, 2006; and
  - (c) Letter dated May 12, 2006 from Joseph J. Arvay Q.C. to Robert Pellatt, Commission Secretary, with enclosures.
2. First, all of this evidence arose after the evidentiary phase of this proceeding was closed, and thus there was no opportunity to adduce it at the appropriate time.
3. For the reasons given in TRAHVOL’s arguments, the evidence described in paragraphs 1(a) and (b) are relevant to this Commission’s application of the “precautionary principle” and its own “prudent avoidance policy”, as they speak to the present state of flux in international standards and regulations in other jurisdictions with respect to the potential health effects of EMF.
4. The evidence described in paragraph 1(c) is relevant to the weight to be afforded by this Commission to the submissions of the Commercial Energy Consumers of British Columbia (“CEC”) (and, indeed, to the evidence of other intervenors who did not adduce evidence or put forward any witnesses for cross-examination). To the extent that the CEC has purported to represent “commercial ratepayers” in this proceeding, the evidence referred to in paragraph 1(c) casts considerable doubt on the veracity of that claim. As

the CEC did not put forward any witnesses for cross-examination during the evidentiary phase of the proceeding, there was no opportunity to elicit this evidence at that time.

ALL OF WHICH IS RESPECTFULLY SUBMITTED

Dated at Vancouver this 29<sup>th</sup> day of May, 2006

  
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Joseph J. Arvay, Q.C.  
  
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Mark G. Underhill

Counsel for TRAHVOL