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British Columbia Utilities Commission
Sixth Floor, 900 Howe Street, Box 250
Vancouver, BC, V6Z 2N3
Attn: Patrick Wruck, Commission Secretary

By: web filing

Dear Sir:

Re: Site C Inquiry, Comments on A-22 Alternative Portfolio and A-22-1 Spreadsheet.

These are B.C. Sustainable Energy Association's comments on the Commission staff's Exhibit A-22 Alternative Portfolio document and Exhibit A-22-1 spreadsheet.

The scope of the comments the Commission will accept is described as follows:

The Panel invites comments from BC Hydro and other parties on these Alternative Portfolios of generating projects and demand-side management (DSM) initiatives; in particular:

- The underlying assumptions regarding the Alternative Portfolios (see the Key Assumptions table for descriptions of all key assumptions); and
- The calculations, inputs and assumptions used in the Alternative Portfolio Spreadsheet. [underline added]

BCSEA's comments are as follows.

1. BCSEA commends the Commission for preparing and populating this model. It provides a framework for parties to make submissions regarding quantitative matters. The model results are not directly comparable to any results for a portfolio that includes completion of Site C. As indicated in its previous submissions to the inquiry, BCSEA's view is that portfolio sensitivity analysis should be the primary methodology relied upon. In that context, what is needed are aggressive input assumptions based on realistic worst case scenarios. The comments the commission receives regarding A-22 and A-22-1 will be helpful in that regard.

2. Regarding wind project capital and O&M costs, consideration should be given to Power Advisory's estimated real levelized cost of CAD\$68/MWh at the point of interconnection in evidence filed by CEBC and CanWEA.¹ Other interested parties will address how that relates quantitatively to the A-22 portfolio assumption 13.

3. Regarding portfolio assumption 19, while the Site C reservoir does not have sufficient storage volume to provide seasonal shaping, the Site C project would provide incremental seasonal shaping of generation by making incremental use of the multi-year storage volumes of the Williston Reservoir. This is explained at F1-1, Appendix F, p.2. And see Dr. Jaccard's footnote 15 and related text on this topic at F29-8, p.9.

¹ Exhibit F104-1.

All the above is respectfully submitted.

Yours truly,

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