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**Date Submitted:** January 22, 2020

**Proceeding name:** BCUC Review of Thermal Energy Systems Regulatory Framework Guidelines

## **Participant contact information**

**Organization or individual name:** Borealis GeoPower Inc.

**City:** Calgary

**Province:** Alberta

**Email:** alison@borealisgeopower.com

**Phone number:** 403-801-6805

## **For organizations only - representative contact information**

**Name:** Alison Thompson (President and CEO)

**Organization (if different from above):**

**City:**

**Province:**

**Email:** alison@borealisgeopower.com

**Phone number:**

**Also representing (if applicable):** Canadian Geothermal Energy Association and Kitselas Geothermal Inc.

## **Additional information**

**Please state your reasons for intervening in this proceeding:**

As represented principally by Borealis GeoPower Inc (BGP), the Canadian Geothermal Energy Association (CanGEA), Kitselas Geothermal Inc (KGI) and BGP are seeking to jointly intervene in this proceeding with the end goal of encouraging the development of sub-80 degree Celsius Geothermal Thermal Energy Systems, especially district heating systems, in the Province of British Columbia.

**Please state how you are directly or sufficiently affected by the Commission's decision in this matter; or describe your experience, information, or expertise relevant to this matter that would contribute to the Commission's decision making:**

BGP is directly affected by the Commission's decision in this matter as BGP is currently in the process of developing a geothermal heating/cooling system by way of the KGI joint venture in the Terrace, BC area. The system is proposed to supply geothermal heating and cooling energy to a nearby industrial/commercial park under development. BGP is also in the process of developing a geothermal heating system near the Village of Valemount, designed to alleviate the Village's air quality and heat affordability issues. Both of these projects, as well as a class of future potential projects across British Columbia, are proposed to utilize water that has a temperature of less than 80 degrees C at the point where it reaches the surface and as such are not excluded from the definition of public utility as per the UCA. Therefore, the TES Regulatory Framework has a direct relation to the operations and economics of our proposed projects in British Columbia.

**Please list the key issues you intend to address in the proceeding:**

In the Proceeding we intend to address the exemption thresholds of the scaled framework as they relate to geothermal Thermal Energy Systems as well as the Stream A characteristics as defined in Table 1 of the TES Guidelines. We are also seeking to address the issue of the definition of 'geothermal resource'. At present, a geothermal resource greater than 80 degrees Celsius is exempt from the UCA and therefore the TES Regulatory Framework, yet a geothermal resource of less than 80 degrees Celsius is not exempt from the UCA and therefore the TES regulatory framework applies. We view this as a policy issue and are seeking advice/guidance from the BCUC as to how best to fix this issue. We may also address the issue of rate setting.

## **For administrative purposes only**

**Do you intend to participate fully, including attendance at hearings and submission of evidence or information requests, if applicable?:** Yes

**Do you intend to request PACA funding? This does not impact your ability to participate:** Yes

**Have you or your organization web-registered as an intervener or interested party in the past 12 months?:** Yes

**If yes, please provide your username:** [REDACTED]