October 27, 2005

VIA E-MAIL
jarvay@arvayfinlay.com

Mr. Joseph Arvay
Arvay Finlay
440 – 355 Burrard Street
Vancouver, BC V6C 2G8

Dear Mr. Arvay:

Re: British Columbia Transmission Corporation ("BCTC")
Application for Certificate of Public Convenience and Necessity ("CPCN")
For Vancouver Island Transmission Reinforcement Project ("VITR")
Project Number 3698395

Please find enclosed BCTC's Information Request in respect to the Intervenor Evidence of the Tsawwassen Residents Against High Voltage Overhead Lines (TRAHVOL).

Sincerely,

Original signed by:

Marcel Reghelini
Director, Regulatory Affairs

Copy: Robert Pellatt, Commission Secretary
Registered Intervenors
1.0 Exhibit C3-19A, Testimony of Magda Havasiaz Pardham

Reference page 2/15, lines 1-2

1.1 Please provide a copy of the complete curriculum vitae for Magda Havas.

Reference page 2/15, lines 2-4

1.2 Please indicate the status of Appendix B for the purpose of this proceeding. That is, does it form part of Magda Havas' testimony? If so, please indicate any parts of Appendix B that Magda Havas is not prepared to testify to as her current opinion.

Reference page 2/15, lines 5-6

1.3 Please indicate the status of Appendix C for the purpose of this proceeding. That is, does it form part of Magda Havas' testimony? If so, please confirm that Magda Havas will swear that the information set out in Appendix C is true.

1.4 Has the Wu paper in Appendix C been published in a peer-reviewed legal or scientific journal? If so, please provide the appropriate reference.

Reference page 3/15, lines 29-32 and all of section 1

1.5 In addition to the presence of a dose-response relationship, please describe the methods that you used to assess causality in these data.

Reference page 3-4/15

1.6 What do you mean by the use of the term “indicated” on page 3, line 31 and page 4, line 1?

Reference Table 1

1.7 Please describe the nature (i.e., instantaneous or long-term measure, measured or calculated, etc.) of the magnetic flux density (MFD) measurement in each of the studies, including the study by Savitz et al., 1988. Please identify any odds ratios from these studies that were not included in your table. Also, please describe the methodology used to select these studies from the epidemiology literature on EMF and childhood leukemia 1979-2005.

Reference page 4/15, lines 8-11

1.8 In your opinion, what physical entity is the cause of the increased risk you describe for leukemia in reference to Draper et al., 2005?
Reference page 4/15, lines 14-16

1.9 Is the sentence starting “In Sweden (Feychting and Ahlbom 1993).” the basis for your statement in the previous sentence, “Younger children are more sensitive to magnetic fields than older children.”?

Reference page 5/15, lines 17-20

1.10 You state that studies suggest that nighttime exposure is critical. Please identify studies that assess risk based on nighttime exposure.

Reference page 5/15, lines 22-25

1.11 Please provide specific references, including page numbers and tables that you believe support your conclusions that magnetic fields should be guaranteed to be under 2 mG (and preferably under 1 mG) at the edge of the right-of-way.

Reference page 5/15, lines 25-28

1.12 Please provide specific references, including page numbers and tables that you believe support your conclusions that magnetic fields should be not exceed 2 mG where there is likely to be human exposure for any prolonged period of time (hours per day).

1.13 Please be more specific in defining hours per day.

Reference page 6/15, lines 6 to 17

1.14 The first paragraph cites Miller et al., 1996 regarding the effect of electric fields on adult leukemia, while the next paragraph cites the effect of electromagnetic fields. Please clarify the exposures incurred by the electrical workers studied by Bethwaite et al., 2001 and the source of the statement [line 16] that risks were linked to exposures above 10 mG.

1.15 You refer to Table 18 of your 2000 paper, which refers to NIEHS (1998) Table 4-11. Is your table identical to Table 4-11?

1.16 What other ‘recent’ studies are you referring to for your analysis aside from Bethwaite et al.?

1.17 Do you believe that more recent scientific studies not included in Havas (2000) support the conclusions in this 2005 report? What statements are different between your 2000 review and this 2005 report?

Reference page 7/15, lines 9-13

1.18 In your reference to Doreen Banks, please provide information regarding her affiliations. Provide reference to available descriptions and summaries of this conference.

Reference page 8/15, line 12
1.19 Please explain what type of magnetic field exposure was assessed or measured in the study by Goldhaber et al., 1988. Please provide a list of other studies that you have reviewed with associations between miscarriage and the same type of exposure assessed in Goldhaber et al., 1988.

Reference page 8/15, lines 36-37

“The guideline does not consider cancer as a possible outcome.”

1.20 Please clarify this statement about what ICNIRP considers in the review process. Do you mean to say that the scientists who reviewed the literature for ICNIRP did not review epidemiology and experimental studies of cancer and EMF to see if the scientific evidence supported the inference of a causal relationship between EMF and cancer?

Reference page 9/15, lines 9-10

1.21 Is it your opinion that laboratory experiments should be used as a basis for cause-effect conclusions between magnetic fields and adverse health outcomes? Please list laboratory experiments that conclude that magnetic fields are harmful and explain the harm in terms of human health.

Reference page 10/15, lines 1-5

1.22 Identify the individual, organization or authority that made the proposals in Italy, Sweden, and Switzerland. Please provide the date of the proposal, the status of the proposal, documentary evidence of the proposal, and identify what organization or political authority is considering these proposals?

1.23 Please explain how you verified that, in Israel, “it is difficult to sell your home if values exceed 10 mG.” Please define what is meant by 10 mG in this context. Please provide empirical evidence supporting this conclusion.

Reference page 10/15, lines 9,11

1.24 Please define “dirty electricity.” For what reason do you presume that the proposed line will be associated with or produce “dirty electricity.” Please provide all supporting data for this conclusion.

Reference page 10/15, lines 14-15

1.25 What is the source of your statement and opinion that ground current refers to what was previously called stray voltage?

Reference page 10/15, lines 17-20

1.26 Provide the references and exact statements within each reference that support the statement that ground current is a “serious problem,” and that it is associated with these adverse effects on cattle? Do you believe that the proposed project poses a risk to human health from ‘stray voltage’? If so, please provide your fully documented rationale for this conclusion.

1.27 Please clarify what you mean by “associated with” on line 18, and clarify whether you believe or contend that the Minnesota Report concluded that ground current is a cause
of miscarriages, mastitis or reduced milk yields.

Reference page 10/15, line 34

1.28 Under what circumstances, and in what type of water pipes, does ground current “flow through water pipes” and access a home?

Reference page 11/15, lines 10-12

1.29 Provide specific levels of ground currents and contact currents that are associated with or cause health problems in people in your opinion. Please provide all references and documents (if not publicly available) that support the statement that ground currents and contact currents are associated with or cause health problems in people.

Reference page 11/15, lines 23-26

1.30 Please provide published, peer-reviewed references in support of the concept that “dirty electricity” is “biologically active,” and indicate what the demonstrated effects are on human health. Provide specific levels of “dirty electricity” being referred to.

Reference page 11/15, lines 23-37

1.31 Please provide a copy of the document or presentation for the following, unpublished citations:


Reference page 12-14/15, Part 5 Precautionary Principle

1.32 What actions regarding siting of a transmission line would be consistent with your understanding of WHO’s application of the precautionary principle?

1.33 Would it be consistent with your definition of the precautionary principle to increase the voltage of the line and cause no increase in average annual magnetic field level at the edge of the right of way?

1.34 Would it be consistent with your definition of the precautionary principle to construct the proposed BCTC line without increasing “dirty electricity” and ground currents?

Reference page 15/15, concluding comments, line 2
1.35 Please identify and provide the location of farms that would be impacted by the proposed line, and explain the physical entity that will impact them and the nature of the impact.

Reference page 15/15, concluding comments, line 3

1.36 What scientific evidence supports your opinion that a transmission line impacts animals? What type of animals are you referring to? What is the nature of the cause of such alleged impacts?

Reference page 15/15, concluding comments, line 4

1.37 What scientific evidence supports your opinion that electric fields at the levels associated with the proposed BCTC line are likely to affect the health of people, children and animals?

1.38 What scientific evidence supports your opinion that ground current and dirty electricity adversely affects the health of people, children and animals?

Reference Appendix A, page 2/8, Scholarly and Professional Work

1.39 Please provide copies of all letters and popular press identified.

2.0 Exhibit C3-19A, Landscape Restoration Proposal, page 1

“I was asked by the steering committee of T.R.A.H.V.O.L. to inspect a sample of yards along the hydro line right-of-way, in order to provide an estimate of the cost of restore the landscape of these properties, if the hydro project proceeds underground as planned.”

2.1 Please indicate the witnesses full experience in landscape restoration for projects such as that proposed.

2.2 Please indicate the complete instructions the witness was given by the steering committee of T.R.A.H.V.O.L. including any written materials that formed or accompanied these instructions.

2.3 Please indicate if the steering committee asked to have all or any of the yards reviewed in the report included in the sample or if the witness was given complete discretion in identifying the sample.

2.4 If the witness was given full or any discretion in identifying which yards would form part of the sample, please indicate how the sample was formed.

2.5 There is reference to native trees facing destruction that are of a size and form that would not be replacable. Which properties have native species within the existing right-of-way that are of significant size and are permitted under the ROW agreement?

2.6 For each property estimate, what were the number of trees and shrubs and estimated replacement costs upon which these restoration figures are based? Provide an itemized list for each property of trees, shrubs or other landscape plants that may require
replacement if disturbed including the cost estimate?

2.7 Provide an itemized list similar to that identified in the question above for all properties owned by TRAHVOL members on the affected right of way but not included in the eight properties considered.

2.8 How was it determined what vegetation or landscape structures, sheds etc. would be disturbed by the proposed construction?

2.9 What labour rate and time estimates are these restoration figures based on for each property?

2.10 Please indicate, for each yard reviewed in the report, all other assumptions relied on in arriving at the referenced estimates.

2.11 Did the estimates for sheds, greenhouses, fences, and other landscape amenities account for moving and reuse of the existing structures present or are they all based on replacement costs for entirely new structures?

2.12 Did the landscape designer determine whether the landscaping amenities itemized were approved to be present within the right of way and conform to the existing right of way agreements?

2.13 With respect to the Mattei property at 1170-53A Street, provide an itemized list of the exotic plant material estimated to be $100 K? Do these plant materials costs take into account whether any existing specimens can be salvaged and reused following construction? If not, why not?

2.14 Do the estimates on other properties take into account whether any existing specimens can be salvaged and reused following construction? If not, why not?

2.15 For each yard reviewed in the report, please provide detailed calculations showing how the estimated costs were arrived at.

2.16 Please provide colour copies of the attached photographs.

2.17 Please provide further photos of the subject properties that allow a determination to be made of the location of plants and structures and their heights relative to the right-of-way and proposed construction zone.

3.0 Exhibit C3-19B, Affidavit of Bernadette Kudzin, para. 2 through 16

3.1 Please provide colour copies of the photographs attached as Exhibits.

4.0 Exhibit C3-19B, Affidavit of Neil Atchison sworn October 13, 2005, para. 4

"The existing 138 kV power lines were present at the time, but we did not think that they would be a problem. […] However, I never expected and was never told by the real estate agent who sold us the house, my lawyer for the sale or anyone else that new power lines would ever be installed in my backyard."
4.1 Please confirm that, at the time Mr. and Mrs. Atchison bought their house, they were also aware of the BC Hydro right of way agreement registered against the title to the property.

4.2 Please advise whether Mr. or Mrs. Atchison reviewed the existing right of way agreement before purchasing their property.

5.0 Exhibit C3-19B, Affidavit of Neil Atchison sworn October 13, 2005, para. 13

“If the underground power lines went in, there is no way my wife and I would allow our grandkids to go in the yard, because we would be worried about their well-being.”

5.1 If the Commission determines that the best route for the proposed transmission lines is along the existing right of way, please indicate whether Mr. and Mrs. Atchison would prefer this to take place using overhead or underground construction.

5.2 If the Commission determines that the best option for the proposed transmission lines is overhead construction on the existing right of way, please indicate whether Mr. and Mrs. Atchison would prefer this to take place using higher poles, thereby reducing EMFs immediately under the lines, or using shorter poles, presumably reducing visual impacts.

6.0 Exhibit C3-19B, Affidavit of Neil Atchison sworn October 13, 2005, General

6.1 Please provide colour photographs of Mr. and Mrs. Atchison’s backyard that allow a determination to be made of the location of plants and structures and their heights.

7.0 Exhibit C3-19B, Affidavit of Pam Sutherland sworn October 5, 2005, and Exhibit C36-3, Letter from Pam Sutherland dated October 18, 2005

7.1 Please indicate whether Mrs. Sutherland is a member of TRAHVOL. If so, please indicate what capacity she is filing each of the above-referenced materials in.

8.0 Exhibit C3-19B, Affidavit of Pam Sutherland sworn October 5, 2005, para. 3

“I was aware of the power lines at the time I purchased this house.”

8.1 Please confirm that, at the time Mrs. and Mr. Sutherland purchased their house, Mrs. and Mr. Sutherland were also aware of the existing BC Hydro right of way agreement registered against the title to the property in question.

8.2 Please advise whether Mrs. or Mr. Sutherland reviewed the existing right of way agreement before purchasing their property.

8.3 Please advise whether Mrs. or Mr. Sutherland sought any legal advice to confirm BC Hydro’s rights and obligations under the existing right of way agreement. If so, please indicate what that advice was.

9.0 Exhibit C3-19B, Affidavit of Pam Sutherland sworn October 5, 2005, para. 9

“It appears that BC Hydro has already made significant and clandestine changes to the power
actually running through the existing lines. There is a far louder “buzzing” noise coming from the lines than was audible when we first took possession.”

9.1 Please provide any further support that Mrs. Sutherland has for this suggestion.

9.2 Please provide all correspondence or communications between Mrs. or Mr. Sutherland and BCTC or BC Hydro raising this concern.

10.0 Exhibit C3-19B, Affidavit of Pam Sutherland sworn October 5, 2005, para. 10 and 11

“I am adamantly opposed to BCTC’s proposal to bury the lines. […]

Overhead lines with their ugliness will be just as menacing with 24 times the current power running through.”

10.1 If the Commission determines that the best route for the proposed transmission lines is along the existing right of way, please indicate whether Mrs. and Mr. Sutherland would prefer this to take place using overhead or underground construction.

10.2 If the Commission determines that the best option for the proposed transmission lines is overhead construction on the existing right of way, please indicate whether Mrs. and Mr. Sutherland would prefer this to take place using higher poles, thereby reducing EMFs immediately under the lines, or using shorter poles, presumably reducing visual impacts.

11.0 Exhibit C3-19B, Affidavit of Pam Sutherland sworn October 5, 2005, para. 13

“Public comments from BCTC staff have made it more difficult for me to sell my house. Mr. Dennis Maniago, BCTC’s Vice President of System Planning & Asset Management has written some ill-advised letters to local newspapers in an attempt to justify and minimize the act of expropriation. His aggressive and irresponsible talk combined with the buying public’s fear of an unshielded powerline running through the backyards along the right of way, has served to further deflate the value of my house.”

11.1 Please provide copies of all of the referenced correspondence.

11.2 Please provide copies of all correspondence from Mrs. Sutherland or other members of TRAHVOL to newspapers, other media, government or other stakeholders regarding the VITR Project.

11.3 Please provide copies of all presentations that Mrs. Sutherland or other members of TRAHVOL have made regarding the VITR Project.

12.0 Exhibit C3-19B, Affidavit of Pam Sutherland sworn October 5, 2005, General

12.1 Please provide colour photographs of Mr. and Mrs. Atchison’s backyard that allow a determination to be made of the location of plants and structures and their heights.

13.0 Exhibit C3-19B, Affidavit of Julie Berks sworn October 12, 2005, para. 4

“For further, we were assured that when the natural life of the lines was over they would be
removed and our yard would be free of power lines."

13.1 Please indicate whether this discussion took place prior to or after Mrs. Berks and her husband purchased the property in question.

13.2 Please provide any written record of this telephone conversation and copies of all correspondence or other communications confirming this conversation.

13.3 Please confirm that, at the time Mrs. Berks and her husband purchased the property in question, they were aware of the BC Hydro right of way agreement registered against the title to the property.

13.4 Please advise whether Mrs. or Mr. Berks reviewed the existing right of way agreement before purchasing their property.

13.5 Please advise whether Mrs. Berks or her husband sought any legal advice to confirm BC Hydro’s rights and obligations under the existing right of way agreement. If so, please indicate what that advice was.

14.0 Exhibit C3-19B, Affidavit of Julie Berks sworn October 12, 2005, para. 9

14.1 Please provide colour copies of the photographs attached as Exhibit “A”.

15.0 Exhibit C3-19B, Affidavit of Julie Berks sworn October 12, 2005, para. 13

“We are very concerned about our backyard being destroyed to bury the power lines."

15.1 If the Commission determines that the best route for the proposed transmission lines is along the existing right of way, please indicate whether Mrs. and Mr. Berks would prefer this to take place using overhead or underground construction.

15.2 If the Commission determines that the best option for the proposed transmission lines is overhead construction on the existing right of way, please indicate whether Mrs. and Mr. Berks would prefer this to take place using higher poles, thereby reducing EMFs immediately under the lines, or using shorter poles, presumably reducing visual impacts.

16.0 Exhibit C3-19B, Affidavit of Julie Berks sworn October 12, 2005, para. 13

“Although BCTC has promised to restore the rest of the yard to its original condition, BCTC’s actions to date give us little reason to believe it will live up to this promise.”

16.1 Please provide full details of any instance where Mrs. and Mr. Berks feel that BCTC has broken a promise to them.

17.0 Exhibit C3-19B, Affidavit of Julie Berks sworn October 12, 2005, para. 15

“I feel that since BCTC and BC Hydro have assured us the lines would be removed when they had reached the end of their useful lives, BCTC should respect that promise.”

17.1 Please provide full details, along with copies of any correspondence or communications,
whereby BCTC assured Mr. and Mrs. Berks that the lines would be removed when they had reached the end of their useful lives.

18.0 Exhibit C3-19B, Affidavit of Vince Strother sworn October 5, 2005, para 4

“The power lines were present at the time we purchased this house. We did not have much time to make a decision regarding the purchase of this house, and we did not make any inquiries about the power lines at the time. However, our understanding over the years has been that the transmission lines were always intended to be temporary, and that after 50 years they would be removed.”

18.1 Please confirm that, at the time Mr. and Mrs. Strother purchased their property, Mr. or Mrs. Strother were aware of the BC Hydro right of way agreement registered against the title to the property.

18.2 Please advise whether Mr. or Mrs. Strother reviewed the existing right of way agreement before purchasing their property.

18.3 Please indicate what evidence Mr. and Mrs. Strother rely on for their understanding that the transmission lines were always intended to be temporary, and that after 50 years they would be removed. If this understanding is based on information provided by BCTC or BC Hydro, please provide copies of any correspondence or communications between Mr. and Mrs. Strother and BCTC or BC Hydro supporting this understanding.

18.4 Please advise whether Mr. or Mrs. Strother have ever sought any legal advice to confirm BC Hydro’s rights and obligations under the existing right of way agreement. If so, please indicate what that advice was.

19.0 Exhibit C3-19B, Affidavit of Vince Strother sworn October 5, 2005, para. 6

“If the BCTC proposals to put in new lines (either underground or overhead), I fear that I would lose a substantial portion of the value of my home.”

19.1 If the Commission determines that the best route for the proposed transmission lines is along the existing right of way, please indicate whether Mr. and Mrs. Strother would prefer this to take place using overhead or underground construction.

19.2 If the Commission determines that the best option for the proposed transmission lines is overhead construction on the existing right of way, please indicate whether Mr. and Mrs. Strother would prefer this to take place using higher poles, thereby reducing EMFs immediately under the lines, or using shorter poles, presumably reducing visual impacts.

20.0 Exhibit C3-19B, Affidavit of Vince Strother sworn October 5, 2005, para. 7

“The company has simply advised us that they will be taking rights to my land, and they refuse to provide answers to question that I have about project.”

20.1 Please identify all questions that Mr. Strother has asked about the VITR Project that he says BCTC has refused to provide answers to including any supporting documentation.
21.0 Exhibit C3-19B, Affidavit of Vince Strother sworn October 5, 2005, General

21.1 Please provide colour photographs of Mr. and Mrs. Strother’s backyard that allow a determination to be made of the location of plants and structures and their heights.

22.0 Exhibit C3-19B, Affidavit of Kevin Jamieson sworn October 5, 2005, para. 4

“The power lines were present at the time we bought it, but our real estate agent said that they were going to be temporary lines. It was her belief that they powered the Gulf Islands, which I took to mean that not very much power ran through the lines. Our impression was that the lines were going to be removed at some time and that only some of them were active.”

22.1 Please confirm that, at the time Mr. Jamieson purchased his property, he was aware of the BC Hydro right of way agreement registered against the title to the property.

22.2 Please advise whether Mr. Jamieson reviewed the existing right of way agreement before purchasing his property.

22.3 Please provide copies of any correspondence or other communications between Mr. Jamieson and BCTC or BC Hydro regarding whether the lines were going to be removed at some time and that only some of them were active.

22.4 Please advise whether Mr. Jamieson has ever sought any legal advice to confirm BC Hydro’s rights and obligations under the existing right of way agreement. If so, please indicate what that advice was.

23.0 Exhibit C3-19B, Affidavit of Kevin Jamieson sworn October 5, 2005, para. 8

“If BCTC decided to bury new higher voltage power lines, we would be forced to seriously consider moving.”

23.1 If the Commission determines that the best route for the proposed transmission lines is along the existing right of way, please indicate whether Mr. Jamieson would prefer this to take place using overhead or underground construction.

23.2 If the Commission determines that the best option for the proposed transmission lines is overhead construction on the existing right of way, please indicate whether Mr. Jamieson would prefer this to take place using higher poles, thereby reducing EMFs immediately under the lines, or using shorter poles, presumably reducing visual impacts.

24.0 Exhibit C3-19B, Affidavit of Kevin Jamieson sworn October 5, 2005, General

24.1 Please provide colour photographs of Mr. Jamieson’s backyard that allow a determination to be made of the location of plants and structures and their heights.

25.0 Exhibit C3-19B, Affidavit of John Wade sworn October 5, 2005, para. 5

“Additionally, our real estate agent, Kathy Dickinson, informed us that the power lines were for backup use only and were due to be taken down (no timeframe given)."
25.1 Please confirm that, at the time Mr. and Mrs. Wade purchased their property, they were aware of the BC Hydro right of way agreement registered against the title to the property.

25.2 Please advise whether Mr. or Mrs. Wade reviewed the existing right of way agreement before purchasing his property.

25.3 Please advise whether Mr. or Mrs. Wade has ever sought any legal advice to confirm BC Hydro’s rights and obligations under the existing right of way agreement. If so, please indicate what that advice was.

26.0 Exhibit C3-19B, Affidavit of John Wade sworn October 5, 2005, para. 9 and 10

“Although burial of the line would minimize the EMF if the cable were deep and (Six Feet?) adequately shielded, I have no faith in BCTC to carry out such a scheme. […]

We are not in favour of overhead lines because they would likely be more dangerous since they could not be shielded. They would also be uglier and much more noticeable than the current poles.”

26.1 If the Commission determines that the best route for the proposed transmission lines is along the existing right of way, please indicate whether Mr. and Mrs. Wade would prefer this to take place using overhead or underground construction.

26.2 If the Commission determines that the best option for the proposed transmission lines is overhead construction on the existing right of way, please indicate whether Mr. and Mrs. Wade would prefer this to take place using higher poles, thereby reducing EMFs immediately under the lines, or using shorter poles, presumably reducing visual impacts.

27.0 Exhibit C3-19B, Affidavit of John Wade sworn October 5, 2005, para. 11

“I feel that BCTC and the provincial government have both lied to us regarding the power lines.”

27.1 Please provide all instances where Mr. Wade feels that BCTC has lied to him along with any supporting documentation.

28.0 Exhibit C3-19B, Affidavit of John Wade sworn October 5, 2005, General

28.1 Please provide colour photographs of Mr. and Mrs. Wade’s backyard that allow a determination to be made of the location of plants and structures and their heights.

29.0 Exhibit C3-19B, Affidavit of Peter Toigo sworn October 11, 2005, para. 4

“The power lines were present when we bought our home. We understood the lines were antiquated, that they had met their lifespan and were to become obsolete at some point. I was informed by someone who worked at BC Hydro that the lines were barely used.”

29.1 Please indicate whether the discussion with someone from BC Hydro took place prior to or after Mr. and Mrs. Toigo purchased the property in question.
29.2 Please indicate who Mr. Toigo spoke to at BC Hydro and provide any written record of this communication and copies of all correspondence or other documentation confirming this communication.

29.3 Please confirm that, at the time Mr. and Mrs. Toigo purchased their property, they were aware of the BC Hydro right of way agreement registered against the title to the property.

29.4 Please advise whether Mr. or Mrs. Toigo reviewed the existing right of way agreement before purchasing his property.

29.5 Please advise whether Mr. or Mrs. Wade has ever sought any legal advice to confirm BC Hydro’s rights and obligations under the existing right of way agreement. If so, please indicate what that advice was.

30.0 Exhibit C3-19B, Affidavit of Peter Toigo sworn October 11, 2005, para. 6

30.1 Please provide a colour copy of the photograph that is attached as Exhibit “A” to Mr. Toigo’s Affidavit.

31.0 Exhibit C3-19B, Affidavit of Peter Toigo sworn October 11, 2005, para. 11 and 12

“We are concerned about the proposal to bury the lines. […] Overhead lines are not an option.”

31.1 If the Commission determines that the best route for the proposed transmission lines is along the existing right of way, please indicate whether Mr. and Mrs. Toigo would prefer this to take place using overhead or underground construction (assuming the underground proposal proceeds on the basis set out in the Application).

31.2 If the Commission determines that the best option for the proposed transmission lines is overhead construction on the existing right of way, please indicate whether Mr. and Mrs. Toigo would prefer this to take place using higher poles, thereby reducing EMFs immediately under the lines, or using shorter poles, presumably reducing visual impacts.

32.0 Exhibit C3-19B, Affidavit of Peter Toigo sworn October 11, 2005, para. 12

“We would not have bought here had we known that high voltage lines would go through here – they have no right to do that now.”

32.1 Please indicate who the “they” being referred to is.

32.2 Please provide all evidence in support of the statement that “they have no right to do that now”.

33.0 Exhibit C3-19B, Affidavit of Jill Bickley, sworn October 6, 2005, para. 4

33.1 Please provide colour copies of the photographs attached as Exhibit “A” to Ms. Bickley’s Affidavit.
34.0 Exhibit C3-19B, Affidavit of Jill Bickley, sworn October 6, 2005, para. 7

“BC Hydro informed my ex-husband that the lines were merely backup lines to the islands, not the main route over there. BC Hydro told him that the lines would remain in this capacity, and there were no plans to make them the main source of electricity for the islands.”

34.1 Please indicate whether this discussion took place prior to or after Ms. Bickley and her ex-husband purchased the property in question.

34.2 Please indicate who Ms. Bickley’s ex-husband spoke to at BC Hydro and provide any written record of this communication and copies of all correspondence or other documentation confirming this communication.

34.3 Please confirm that, at the time Ms. Bickley and her ex-husband bought the property in question, Ms. Bickley was aware of the BC Hydro right of way agreement registered against the title to the property.

34.4 Please advise whether Ms. Bickley or her ex-husband reviewed the existing right of way agreement before purchasing their property.

34.5 Please advise whether Ms. Bickley or her ex-husband sought any legal advice to confirm BC Hydro’s rights and obligations under the existing right of way agreement. If so, please indicate what that advice was.

35.0 Exhibit C3-19B, Affidavit of Jill Bickley, sworn October 6, 2005, para. 9

“If BCTC gets an approval for the proposed new line, I will have to make some painful decisions. During construction of new lines, I would have to shut down my daycare. The daycare licencing authorities would not allow me to have children in my yard next to a construction site.”

35.1 Please provide copies of all correspondence or communications with the “daycare licencing authorities” providing this advice.

35.2 Please provide copies of all correspondence or communications with BCTC raising this issue for discussion with them and how they may be able to avoid or mitigate this.

36.0 Exhibit C3-19B, Affidavit of Jill Bickley, sworn October 6, 2005, para. 23

“Perhaps if they bury the line, a few years from now the prices will recover so that I could sell at a reasonable price – but in the meantime I will have lost my business.”

36.1 If the Commission determines that the best route for the proposed transmission lines is along the existing right of way, please indicate whether Ms. Bickley would prefer this to take place using overhead or underground construction.

36.2 If the Commission determines that the best option for the proposed transmission lines is overhead construction on the existing right of way, please indicate whether Ms. Bickley would prefer this to take place using higher poles, thereby reducing EMFs immediately under the lines, or using shorter poles, presumably reducing visual impacts.
37.0 Exhibit C3-19B, Affidavit of Maureen Broadfoot, sworn October 5, 2005, para. 4

37.1 “The power lines were present at the time we purchased the house. We purchased the house quickly, within a day, and the realtor assured us that the power lines were used to supply back-up power to Galiano Island. The power lines were not a visual concern for us, as they are located in the back third of the lot. We understood that they were in fact back up lines, and we had no idea at the time that a new transmission lines project was being planned. We would not have purchased the house if we had been made aware of this.”

37.2 Please confirm that, at the time Mrs. and Mr. Broadfoot bought the property in question, they were aware of the BC Hydro right of way agreement registered against the title to the property.

37.3 Please advise whether Mrs. or Mr. Broadfoot reviewed the existing right of way agreement before purchasing their property.

37.4 Please advise whether Mrs. or Mr. Broadfoot or her ex-husband sought any legal advice to confirm BC Hydro’s rights and obligations under the existing right of way agreement. If so, please indicate what that advice was.

38.0 Exhibit C3-19B, Affidavit of Maureen Broadfoot, sworn October 5, 2005, para. 12

“If our backyard was excavated to bury high voltage power lines, the fence and the mature landscaping would be destroyed.”

38.1 If the Commission determines that the best route for the proposed transmission lines is along the existing right of way, please indicate whether Mrs. and Mr. Broadfoot would prefer this to take place using overhead or underground construction.

38.2 If the Commission determines that the best option for the proposed transmission lines is overhead construction on the existing right of way, please indicate whether Mrs. and Mr. Broadfoot would prefer this to take place using higher poles, thereby reducing EMFs immediately under the lines, or using shorter poles, presumably reducing visual impacts.

38.3 Please provide colour photographs of Mrs. and Mr. Broadfoot’s backyard that allow a determination to be made of the location of plants and structures and their heights.

39.0 Exhibit C3-19B, Affidavit of Maureen Broadfoot, sworn October 5, 2005, para. 16

“I am aware that there is a safe alternative to the proposed burial of the transmission lines through this community and that the cost difference (under $1 million) is a fraction of the contingency fund for the plan that is currently on the table.”

39.1 Please indicate what this alternative is.

39.2 Is this the alternative that is supported by TRAHVOL? If not, please indicate what AC alternative is supported by TRAHVOL.
40.0 Exhibit C3-19B, Affidavit of Edward Kenmare sworn October 5, 2005, para. 4

“The power lines were present at the time, and although our children expressed some concern, we were told by a public relations person from BC Hydro that the lines were not a risk to our health. Furthermore, our impression from BC Hydro was that the lines were temporary.”

40.1 Did BC Hydro tell you that the lines were temporary? If so, please provide the name of the person at BC Hydro who provided you with this advice and provide any written record of this communication and copies of all correspondence or other documentation confirming this communication.

40.2 Please indicate whether this discussion took place prior to or after Mr. and Mrs. Kenmare purchased the property in question.

40.3 Please confirm that, at the time Mr. and Mrs. Kenmare bought the property in question, they were aware of the BC Hydro right of way agreement registered against the title to the property.

40.4 Please advise whether Mr. or Mrs. Kenmare reviewed the existing right of way agreement before purchasing their property.

40.5 Please advise whether Mr. or Mrs. Kenmare sought any legal advice to confirm BC Hydro’s rights and obligations under the existing right of way agreement. If so, please indicate what that advice was.

41.0 Exhibit C3-19B, Affidavit of Edward Kenmare sworn October 5, 2005, General

41.1 If the Commission determines that the best route for the proposed transmission lines is along the existing right of way, please indicate whether Mr. and Mrs. Kenmare would prefer this to take place using overhead or underground construction.

41.2 If the Commission determines that the best option for the proposed transmission lines is overhead construction on the existing right of way, please indicate whether Mr. and Mrs. Kenmare would prefer this to take place using higher poles, thereby reducing EMFs immediately under the lines, or using shorter poles, presumably reducing visual impacts.

41.3 Please provide colour photographs of Mr. and Mrs. Kenmare’s backyard that allow a determination to be made of the location of plants and structures and their heights.

42.0 Exhibit C3-19B, Affidavit of Marion Fahlman sworn October 5, 2005, para. 3

“The power lines were here when Greg lived here with his dad, step-mother and his siblings. When Greg and I moved into the house, we knew the power lines were close by.”

42.1 Please confirm that, at the time Mrs. and Mr. Fahlman bought the property in question, they were aware of the BC Hydro right of way agreement registered against the title to the property.

42.2 Please advise whether Mrs. or Mr. Fahlman reviewed the existing right of way agreement before purchasing their property.

42.3 Please advise whether Mrs. or Mr. Fahlman sought any legal advice to confirm BC
Hydro’s rights and obligations under the existing right of way agreement. If so, please indicate what that advice was.

43.0 Exhibit C3-19B, Affidavit of Marion Fahlman sworn October 5, 2005, para. 13

“As far as our yard goes, by putting the hydro lines under the ground, the health risk is still there.”

43.1 If the Commission determines that the best route for the proposed transmission lines is along the existing right of way, please indicate whether Mrs. and Mr. Fahlman would prefer this to take place using overhead or underground construction.

43.2 If the Commission determines that the best option for the proposed transmission lines is overhead construction on the existing right of way, please indicate whether Mrs. and Mr. Fahlman would prefer this to take place using higher poles, thereby reducing EMFs immediately under the lines, or using shorter poles, presumably reducing visual impacts.

44.0 Exhibit C3-19B, Affidavit of Marion Fahlman sworn October 5, 2005, General

44.1 Please provide colour photographs of Mrs. and Mr. Fahlman’s backyard that allow a determination to be made of the location of plants and structures and their heights.

45.0 Exhibit C3-19B, Affidavit of Bernadette Kudzin sworn October 5, 2005, para. 3

45.1 Please provide a colour copy of the photograph attached as Exhibit “A” to Mrs. Kudzin’s Affidavit.

46.0 Exhibit C3-19B, Affidavit of Bernadette Kudzin sworn October 5, 2005, para. 4 and 5

“Because the power lines were present at the time, we spoke with our realtor (Mr. Tim Hoskins) and BC Hydro about the long term plans regarding the right of way. […] Our realtor also told us the lines would be removed at the end of their useful lifespan.”

46.1 Did BC Hydro tell you that the lines would be removed at the end of their useful lifespan?

46.2 Did BC Hydro tell you that the lines would never be replaced?

46.3 Please provide the name of the person from BC Hydro that provided any advice to the Kudzins and any written record of any communication regarding the existing or any potential future transmission line on the existing right of way and copies of all correspondence or other documentation confirming this communication.

46.4 Please indicate whether any discussions with BC Hydro took place prior to or after Mrs. and Mr. Kudzin purchased the property in question.

46.5 Please confirm that, at the time Mrs. and Mr. Kudzin bought the property in question, they were aware of the BC Hydro right of way agreement registered against the title to the property.

46.6 Please advise whether Mrs. or Mr. Kudzin reviewed the existing right of way agreement
before purchasing their property.

46.7 Please advise whether Mrs. or Mr. Kudzin sought any legal advice to confirm BC Hydro's rights and obligations under the existing right of way agreement. If so, please indicate what that advice was.

47.0 Exhibit C3-19B, Affidavit of Bernadette Kudzin sworn October 5, 2005, para. 6

47.1 Please provide a colour copy of the photograph attached as Exhibit “C” to Mrs. Kudzin’s Affidavit (none attached to previous copy provided).

48.0 Exhibit C3-19B, Affidavit of Bernadette Kudzin sworn October 5, 2005, para. 14 and 15

48.1 Please confirm that if the Commission determines that the best route for the proposed transmission lines is along the existing right of way, Mrs. and Mr. Kudzin would prefer this to take place using underground rather than overhead construction.

48.2 If the Commission determines that the best option for the proposed transmission lines is overhead construction on the existing right of way, please indicate whether Mrs. and Mr. Kudzin would prefer this to take place using higher poles, thereby reducing EMFs immediately under the lines, or using shorter poles, presumably reducing visual impacts.

49.0 Exhibit C3-19B, Affidavit of Lara Robinson sworn October 5, 2005, para. 4

“As we grew up in Tsawwassen, we were aware of the power lines.”

49.1 Please confirm that, at the time Mrs. and Mr. Robinson bought the property in question, they were aware of the BC Hydro right of way agreement registered against the title to the property.

49.2 Please advise whether Mrs. or Mr. Robinson reviewed the existing right of way agreement before purchasing their property.

49.3 Please advise whether Mrs. or Mr. Robinson sought any legal advice to confirm BC Hydro’s rights and obligations under the existing right of way agreement. If so, please indicate what that advice was.

50.0 Exhibit C3-19B, Affidavit of Lara Robinson sworn October 5, 2005, para. 11

“We also do not want our backyard ripped up to bury the lines, as we enjoy our gardens and have nine mature fruit trees that are harvestable. Most of the other trees and shrubs are mature, having been planted more than 20 years ago.”

50.1 If the Commission determines that the best route for the proposed transmission lines is along the existing right of way, please indicate whether Mrs. and Mr. Robinson would prefer this to take place using overhead or underground construction.

50.2 If the Commission determines that the best option for the proposed transmission lines is
overhead construction on the existing right of way, please indicate whether Mrs. and Mr. Robinson would prefer this to take place using higher poles, thereby reducing EMFs immediately under the lines, or using shorter poles, presumably reducing visual impacts.

50.3 Please provide colour photographs of Mrs. and Mr. Robinson’s backyard that allow a determination to be made of the location of plants and structures and their heights.

51.0 Exhibit C3-19B, Affidavit of Mike Gardner sworn October 5, 2005, para. 3

51.1 Please provide colour copies of the photographs attached as Exhibit “A” to Mr. Gardner's Affidavit.

52.0 Exhibit C3-19B, Affidavit of Mike Gardner sworn October 5, 2005, para. 4

“The power lines were here when we bought the house.”

52.1 Please confirm that, at the time Mr. and Mrs. Gardner bought the property in question, they were aware of the BC Hydro right of way agreement registered against the title to the property.

52.2 Please advise whether Mr. or Mrs. Gardner reviewed the existing right of way agreement before purchasing their property.

52.3 Please advise whether Mr. or Mrs. Gardner sought any legal advice to confirm BC Hydro’s rights and obligations under the existing right of way agreement. If so, please indicate what that advice was.

53.0 Exhibit C3-19B, Affidavit of Mike Gardner sworn October 5, 2005, para. 10

“If a proposal to bury new higher voltage power lines along the current right of way was approved, BCTC would have to dig up the garden. We would lose the trees. I have done a lot of construction in the back. We have a pond, barbeque pit, greenhouse and shed. We have grape vines and trees that, if dug up, would not be replaceable in my lifetime. Everything would be wrecked. All the things we like about this place would be gone. We have 5 fruit trees, grape vines, and tomatoes, and all of that would be gone. We do not want the high voltage line overhead either.”

53.1 If the Commission determines that the best route for the proposed transmission lines is along the existing right of way, please indicate whether Mr. and Mrs. Gardner would prefer this to take place using overhead or underground construction.

53.2 If the Commission determines that the best option for the proposed transmission lines is overhead construction on the existing right of way, please indicate whether Mr. and Mrs. Gardner would prefer this to take place using higher poles, thereby reducing EMFs immediately under the lines, or using shorter poles, presumably reducing visual impacts.

54.0 Exhibit C3-19B, Affidavit of Cec Dunn sworn October 5, 2005, para. 4

“The only things the real estate agent told us when we bought the house were that we could not have an inground swimming pool, in case BC Hydro needed to access the lines, and that there
was an easement. There was no follow-up from BC Hydro, telling us what we could or could not do with the property.”

54.1 Please advise whether Mr. or Mrs. Dunn reviewed the existing easement agreement before purchasing their property.

54.2 Please advise whether Mr. or Mrs. Dunn sought any legal advice to confirm BC Hydro’s rights and obligations under the easement agreement. If so, please indicate what that advice was.

55.0 Exhibit C3-19B, Affidavit of Cec Dunn sworn October 5, 2005, para. 13

“When we measured the EMF in the house, it was 25 milligauss in the front, and up to 50 milligauss in the back.”

55.1 Please provide full details of the date and time of day these measurements were taken, how the measurements were taken, where the readings in the house were taken and the corresponding measurements, and what the EMF readings were outside of the house at the edge of the right of way and underneath the transmission lines at the same time.

56.0 Exhibit C3-19B, Affidavit of Cec Dunn sworn October 5, 2005, para. 13

“If a proposal to bury new higher voltage power lines along the current right of way was approved, it would be like creating a demilitarized zone in the backyard. […]”

56.1 If the Commission determines that the best route for the proposed transmission lines is along the existing right of way, please indicate whether Mr. and Mrs. Dunn would prefer this to take place using overhead or underground construction.

56.2 If the Commission determines that the best option for the proposed transmission lines is overhead construction on the existing right of way, please indicate whether Mr. and Mrs. Dunn would prefer this to take place using higher poles, thereby reducing EMFs immediately under the lines, or using shorter poles, presumably reducing visual impacts.

57.0 Exhibit C3-19B, Affidavit of Cec Dunn sworn October 5, 2005, para. 13

57.1 Please provide a colour copy of the photograph attached as Exhibit “A” to Mr. Dunn’s Affidavit.

58.0 Exhibit C3-19B, Affidavit of Mary Mireau sworn October 5, 2005, para. 4

“The power lines were present at the time we bought the property. We did not think much of it because we weren’t aware of the health risks. The previous owner who sold the property to us through a private sale did not say anything of the power lines at the time of the transaction.”

58.1 Please confirm that, at the time Mrs. and Mr. Mireau bought the property in question, they were aware of the BC Hydro right of way agreement registered against the title to the property.
58.2 Please advise whether Mrs. or Mr. Mireau reviewed the existing right of way agreement before purchasing their property.

58.3 Please advise whether Mrs. or Mr. Mireau sought any legal advice to confirm BC Hydro’s rights and obligations under the existing right of way agreement. If so, please indicate what that advice was.

59.0 Exhibit C3-19B, Affidavit of Mary Mireau sworn October 5, 2005, para. 14

“We do not want the proposal to go ahead. The proposal has caused us anxiety, stress and anger. The construction will certainly be an inconvenience and would destroy the garden that I have invested much of my time in creating and maintaining. However, we are mostly concerned about the health risks. We do not feel that we should be forced to live with such an intrusive structure in this day and age.”

59.1 If the Commission determines that the best route for the proposed transmission lines is along the existing right of way, please indicate whether Mrs. and Mr. Mireau would prefer this to take place using overhead or underground construction.

59.2 If the Commission determines that the best option for the proposed transmission lines is overhead construction on the existing right of way, please indicate whether Mrs. and Mr. Mireau would prefer this to take place using higher poles, thereby reducing EMFs immediately under the lines, or using shorter poles, presumably reducing visual impacts.

60.0 Exhibit C3-19B, Affidavit of Mary Mireau sworn October 5, 2005, General

60.1 Please provide colour photographs of Mrs. and Mr. Mireau’s backyard that allow a determination to be made of the location of plants and structures and their heights.

61.0 Exhibit C3-19B, Affidavit of Don Parry sworn October 5, 2005, para. 4

“The power lines were present at the time we purchased the property, but they were not a big concern. We were told by our realtor that the lines were old, rarely used, and were likely to be taken down. We later were to learn that as early as 1995, BC Hydro was, in fact, planning to “upgrade” the lines with a view to transmitting more voltage.”

61.1 Please confirm that, at the time Mr. and Mrs. Parry bought the property in question, they were aware of the BC Hydro right of way agreement registered against the title to the property.

61.2 Please advise whether Mr. or Mrs. Parry reviewed the existing right of way agreement before purchasing their property.

61.3 Please advise whether Mr. or Mrs. Parry sought any legal advice to confirm BC Hydro’s rights and obligations under the existing right of way agreement. If so, please indicate what that advice was.

62.0 Exhibit C3-19B, Affidavit of Don Parry sworn October 5, 2005, para. 10

“Although not a preferred option, shielding and putting the lines underground may ultimately be
an acceptable option to us as long as the lines are placed at the far back of our yard. [...].

62.1 If the Commission determines that the best route for the proposed transmission lines is along the existing right of way, please indicate whether Mr. and Mrs. Parry would prefer this to take place using overhead or underground construction (as proposed in BCTC’s Application).

62.2 If the Commission determines that the best option for the proposed transmission lines is overhead construction on the existing right of way, please indicate whether Mr. and Mrs. Parry would prefer this to take place using higher poles, thereby reducing EMFs immediately under the lines, or using shorter poles, presumably reducing visual impacts.

63.0 Exhibit C3-19B, Affidavit of Don Parry sworn October 5, 2005, General

63.1 Please provide colour photographs of Mr. and Mrs. Parry’s backyard that allow a determination to be made of the location of plants and structures and their heights.

64.0 Exhibit C3-19B, Affidavit of Geeta Schallig sworn October 5, 2005, para. 2

64.1 Please provide a colour copy of the photograph attached as Exhibit “A” to Mrs. Schallig’s Affidavit.

65.0 Exhibit C3-19B, Affidavit of Geeta Schallig sworn October 5, 2005, para. 4

“The power lines were present at the time of purchase.”

65.1 Please confirm that, at the time Mrs. and Mr. Schallig bought the property in question, they were aware of the BC Hydro right of way agreement registered against the title to the property.

65.2 Please advise whether Mrs. or Mr. Schallig reviewed the existing right of way agreement before purchasing their property.

65.3 Please advise whether Mrs. or Mr. Schallig sought any legal advice to confirm BC Hydro’s rights and obligations under the existing right of way agreement. If so, please indicate what that advice was.

66.0 Exhibit C3-19B, Affidavit of Ben Dunstan sworn October 6, 2005, para. 4

“Our realtor informed me about the overhead right of way.”

66.1 Please confirm that, at the time Mr. and Mrs. Dunstan bought the property in question, they were aware of the BC Hydro right of way agreement registered against the title to the property.

66.2 Please advise whether Mr. or Mrs. Dunstan reviewed the existing right of way agreement before purchasing their property.

66.3 Please advise whether Mr. or Mrs. Dunstan sought any legal advice to confirm BC Hydro’s rights and obligations under the existing right of way agreement. If so, please
indicate what that advice was.

67.0 Exhibit C3-19B, Affidavit of Ben Dunstan sworn October 6, 2005, para. 9 and 10

“We are dead set against the installation of any new overhead lines. [...]"

Alternatively, running the power lines underground is not an option because of the impact it would have on our property. If BCTC’s proposal goes through, our large shed will have to go and all of our work in the garden will have been for nothing. EMF will also be a concern in the backyard.

67.1 If the Commission determines that the best route for the proposed transmission lines is along the existing right of way, please indicate whether Mr. and Mrs. Dunstan would prefer this to take place using overhead or underground construction.

67.2 If the Commission determines that the best option for the proposed transmission lines is overhead construction on the existing right of way, please indicate whether Mr. and Mrs. Dunstan would prefer this to take place using higher poles, thereby reducing EMFs immediately under the lines, or using shorter poles, presumably reducing visual impacts.

67.3 Please provide colour photographs of Mr. and Mrs. Dunstan’s backyard that allow a determination to be made of the location of plants and structures and their heights.

68.0 Exhibit C3-19B, Affidavit of Ben Dunstan sworn October 6, 2005, para. 11

“I have lost all respect for BCTC – its representatives have not been honest about anything.”

68.1 Please provide all instances when Mr. Dunstan feels that BCTC’s representatives have not been honest with him along with any supporting documentation.

69.0 Exhibit C3-19B, Affidavit of Gail Delaney sworn October 6, 2005, para. 4

“The power lines were present at the time I bought my home, but they did not concern me at the time. I was told that they were low voltage power lines that were being used to send auxiliary power to Vancouver Island.”

69.1 Please confirm that, at the time Ms. Delaney bought the property in question, Ms. Delaney was aware of the BC Hydro right of way agreement registered against the title to the property.

69.2 Please advise whether Ms. Delaney reviewed the existing right of way agreement before purchasing their property.

69.3 Please advise whether Ms. Delaney sought any legal advice to confirm BC Hydro’s rights and obligations under the existing right of way agreement. If so, please indicate what that advice was.

70.0 Exhibit C3-19B, Affidavit of Gail Delaney sworn October 6, 2005, para. 9

“I do not agree with BCTC’s proposal to put in new and more powerful lines. When we first
moved here, we were under the impression that the lines would become redundant and eventually be removed. This turn of events seems like an about face. I feel that I have been deceived.”

70.1 Please advise what led Ms. Delanay to form the conclusion that the lines would become redundant and eventually be removed. If this was based on correspondence or communications with BC Hydro please provide the name of the person at BC Hydro that Ms. Delaney spoke to and provide any record of this communication and any correspondence or other communications confirming this communication.

71.0 Exhibit C3-19B, Affidavit of Gail Delaney sworn October 6, 2005, para. 10

“If BCTC dug the lines underground, it would have to run them right under my vegetable patch, my raised beds, my greenhouse and my shed. Part of my garden is underlain with concrete, which I imagine would also be disrupted. Digging the lines underground would destroy many years of labour. That is not fair. It is unnecessary for them to disrupt people’s lives. There are other options that BCTC refuses to seriously consider.”

71.1 If the Commission determines that the best route for the proposed transmission lines is along the existing right of way, please indicate whether Ms. Delaney would prefer this to take place using overhead or underground construction.

71.2 If the Commission determines that the best option for the proposed transmission lines is overhead construction on the existing right of way, please indicate whether Ms. Delaney would prefer this to take place using higher poles, thereby reducing EMFs immediately under the lines, or using shorter poles, presumably reducing visual impacts.

71.3 Please provide colour photographs of Ms. Delaney’s backyard that allow a determination to be made of the location of plants and structures and their heights.

72.0 Exhibit C3-19B, Affidavit of John Winfield sworn October 6, 2005, para. 3

“Although the power lines were present when we moved into the home, our realtor, Kevin Neufeld, did not make a big deal of them. We were told by the realtor that the lines were high enough and the power running through them was low. We were also told that the lines would come down at one point or another. We did not like the idea of the wires being there but we were not too concerned. We did not know about EMF at the time.”

72.1 Please confirm that, at the time Mr. and Mrs. Winfield bought the property in question, they were aware of the BC Hydro right of way agreement registered against the title to the property.

72.2 Please advise whether Mr. or Mrs. Winfield reviewed the existing right of way agreement before purchasing their property.

72.3 Please advise whether Mr. or Mrs. Winfield sought any legal advice to confirm BC Hydro’s rights and obligations under the existing right of way agreement. If so, please indicate what that advice was.

72.4 Exhibit C3-19B, Affidavit of John Winfield sworn October 6, 2005, General
72.5 Please provide colour photographs of Mr. and Mrs. Winfield’s backyard that allow a determination to be made of the location of plants and structures and their heights.

73.0 Exhibit C3-19B, Affidavit of Leslie Gray sworn October 6, 2005, para. 3

“We chose this particular location because it reminded me of a place I used to live. Although our realtor advised us of the power lines, we wanted a large yard and the property was within our price range. Our realtor did not pass on any specific information about the power lines; it was more the fact that a hydro right-of-way ran through the property. We later learned more about the lines and related concerns from our neighbours.”

73.1 Please advise whether Ms. Gray reviewed the existing right of way agreement before purchasing their property.

73.2 Please advise whether Ms. Gray sought any legal advice to confirm BC Hydro’s rights and obligations under the existing right of way agreement. If so, please indicate what that advice was.

74.0 Exhibit C3-19B, Affidavit of Leslie Gray sworn October 6, 2005, para. 11

“It is frustrating that we must once again go to great effort and expense to fight the current BCTC proposal when, as I understood it, BCTC said they would not use the existing right of way for the power upgrade to Vancouver Island. I am angered that BCTC has rescinded on its work and is once again planning to invade our backyard.”

74.1 Please provide copies of all correspondence or other communications that Ms. Gray relies on to say that BCTC said that they would not use the existing right of way for the power upgrade to Vancouver Island.

75.0 Exhibit C3-19B, Affidavit of Leslie Gray sworn October 6, 2005, para. 13 and 14

“We have put a considerable amount of effort into landscaping our backyard. If the powerlines were run underground, their installation would destroy everything that I have built and to which I have developed an emotional attachment. […]

I will do everything possible to oppose underground power lines running through my property.”

75.1 If the Commission determines that the best route for the proposed transmission lines is along the existing right of way, please indicate whether Ms. Gray would prefer this to take place using overhead or underground construction.

75.2 If the Commission determines that the best option for the proposed transmission lines is overhead construction on the existing right of way, please indicate whether Ms. Gray would prefer this to take place using higher poles, thereby reducing EMFs immediately under the lines, or using shorter poles, presumably reducing visual impacts.

75.3 Please provide colour photographs of Ms. Gray’s backyard that allow a determination to be made of the location of plants and structures and their heights.
76.0 Exhibit C3-19B, Affidavit of Conrad Funk sworn October 5, 2005, para. 6

“Today, I feel very uncomfortable living near the power lines. I borrowed a gaussmeter from my neighbour. The readings in my yard, taken at the same time, were twice as high as in my neighbour’s yard, perhaps because I am at the low part of the line sag. The reading in my bedroom was about 50 milligauss, which is the same reading I get holding the meter a foot away from a microwave running on high (measured away from the line field). In particular, I am concerned because my bedroom is high up on the back side of the house near the power lines.”

76.1 Please provide full details of the date and time of day these measurements were taken, how the measurements were taken, where the readings in the house were taken and the corresponding measurements, and what the EMF readings were outside of the house at the edge of the right of way and underneath the transmission lines at the same time.

77.0 Exhibit C3-19B, Affidavit of Conrad Funk sworn October 5, 2005, General

77.1 Please provide colour photographs of Mr. Funk’s backyard that allow a determination to be made of the location of plants and structures and their heights.

78.0 Exhibit C3-19B, Affidavit of Shelley Willms sworn October 5, 2005, para. 2

78.1 Please provide colour copies of the photographs attached as Exhibit “A” to Mrs. Willms Affidavit.

79.0 Exhibit C3-19B, Affidavit of Shelley Willms sworn October 5, 2005, para. 4

“The power lines were present at the time we purchased the house, and they were a concern for us. Even immediately before closing the deal on the house my husband felt uncertain about making the purchase because of its close proximity to the power lines. However, our realtor and family friend, Todd Jackson, assured us that these lines were used only occasionally as a backup source of power for Vancouver Island. We would not have purchased the property if we had been told at the time that there was electricity running through the overhead power lines regularly, much less if we had known that there may be plans to use them as a power super highway. But, at the time, we had no reason to believe otherwise.”

79.1 Please confirm that, at the time Mrs. and Mr. Willms bought the property in question, they were aware of the BC Hydro right of way agreement registered against the title to the property.

79.2 Please advise whether Mrs. or Mr. Willms reviewed the existing right of way agreement before purchasing their property.

79.3 Please advise whether Mrs. or Mr. Willms sought any legal advice to confirm BC Hydro’s rights and obligations under the existing right of way agreement. If so, please indicate what that advice was.

80.0 Exhibit C3-19B, Affidavit of Shelley Willms sworn October 5, 2005, para. 6

80.1 Please provide a colour copy of the photograph attached as Exhibit “B” to Mrs. Willms Affidavit.
81.0 Exhibit C3-19B, Affidavit of Riaz Pardham sworn October 5, 2005, para. 3

“Although we were aware that power lines ran through our property, we did a significant amount of due diligence research regarding any potential danger that they posed. […] At the time we purchased the house, we had no knowledge that BCTC had any plans to significantly alter this status quo.”

81.1 Please confirm that, at the time Mr. and Mrs. Pardham bought the property in question, they were aware of the BC Hydro right of way agreement registered against the title to the property.

81.2 Please advise whether Mr. or Mrs. Pardham reviewed the existing right of way agreement before purchasing their property.

81.3 Please advise whether Mr. or Mrs. Pardham sought any legal advice to confirm BC Hydro’s rights and obligations under the existing right of way agreement. If so, please indicate what that advice was.

82.0 Exhibit C3-19B, Affidavit of Riaz Pardham sworn October 5, 2005, para. 7

“We also do not want our backyard ripped up to bury the lines, as this would force us to remove the tall hedges that surround the backyard and would change the nature of this area beyond repair.”

82.1 If the Commission determines that the best route for the proposed transmission lines is along the existing right of way, please indicate whether Mr. and Mrs. Pardham would prefer this to take place using overhead or underground construction, as proposed in BCTC’s Application.

82.2 If the Commission determines that the best option for the proposed transmission lines is overhead construction on the existing right of way, please indicate whether Mr. and Mrs. Pardham would prefer this to take place using higher poles, thereby reducing EMFs immediately under the lines, or using shorter poles, presumably reducing visual impacts.

82.3 Please provide colour photographs of Mr. and Mrs. Pardham’s backyard that allow a determination to be made of the location of plants and structures and their heights.

83.0 Exhibit C3-19B, Affidavit of Bruce White sworn October 5, 2005, para. 4

“The power lines were present at the time we moved in. We asked the realtor and our lawyer about them, but did not get any information besides the fact that there was an easement at the edge of the property preventing building any further into the yard. […]”

83.1 Please advise whether Mr. or Mrs. White reviewed the existing easement agreement before purchasing their property.

83.2 Exhibit C3-19B, Affidavit of Bruce White sworn October 5, 2005, General

83.3 If the Commission determines that the best route for the proposed transmission lines is along the existing right of way, please indicate whether Mr. and Mrs. White would prefer this to take place using overhead or underground construction, as proposed in BCTC’s Application.
83.4 If the Commission determines that the best option for the proposed transmission lines is overhead construction on the existing right of way, please indicate whether Mr. and Mrs. White would prefer this to take place using higher poles, thereby reducing EMFs immediately under the lines, or using shorter poles, presumably reducing visual impacts.

83.5 Please provide colour photographs of Mr. and Mrs. White’s backyard that allow a determination to be made of the location of plants and structures and their heights.

84.0 Exhibit C3-19B, Affidavit of John Noble sworn October 5, 2005, para. 4

“The power lines were present when we purchased the house, but were not a concern for us at the time. It did not occur to us to ask any questions about them, and our realtor never mentioned them, as there was little, if anything, known about EMF in 1972. […]”

84.1 Please confirm that, at the time Mr. and Mrs. Noble bought the property in question, they were aware of the BC Hydro right of way agreement registered against the title to the property.

84.2 Please advise whether Mr. or Mrs. Noble reviewed the existing right of way agreement before purchasing their property.

85.0 Exhibit C3-19B, Affidavit of John Noble sworn October 5, 2005, para. 12

“As things stand now, we are likely to remain here for at least a while. We therefore do not want our backyard ripped up to bury the lines, as this would require going through the middle of our yard, rendering the back 100 feet of property useless. […]”

85.1 If the Commission determines that the best route for the proposed transmission lines is along the existing right of way, please indicate whether Mr. and Mrs. Noble would prefer this to take place using overhead or underground construction, as proposed in BCTC’s Application.

85.2 If the Commission determines that the best option for the proposed transmission lines is overhead construction on the existing right of way, please indicate whether Mr. and Mrs. Noble would prefer this to take place using higher poles, thereby reducing EMFs immediately under the lines, or using shorter poles, presumably reducing visual impacts.

85.3 Please provide colour photographs of Mr. and Mrs. Noble’s backyard that allow a determination to be made of the location of plants and structures and their heights.

86.0 Exhibit C3-19B, Affidavit of Lloyd Shiyuk sworn October 5, 2005, para. 4

“The power lines were present when I bought the house, but I was not concerned about them at the time. A friend of mine, an electrical engineer, advised me that the lines could not be upgraded because they were already running at full capacity. Although I was aware of the EMF issue at the time, I did not think it represented a significant risk to the health of my family.”

86.1 Please confirm that, at the time Mr. and Mrs. Shiyuk bought the property in question, they were aware of the BC Hydro right of way agreement registered against the title to
the property.

86.2 Please advise whether Mr. or Mrs. Shiyuk reviewed the existing right of way agreement before purchasing their property.

86.3 Please advise whether Mr. or Mrs. Shiyuk sought any legal advice to confirm BC Hydro’s rights and obligations under the existing right of way agreement. If so, please indicate what that advice was.

87.0 Exhibit C3-19B, Affidavit of Lloyd Shiyuk sworn October 5, 2005, para. 8

“I am concerned about the proposed plan to bury the power lines, mostly because of the potential disruption to our beautiful garden and pond.”

87.1 If the Commission determines that the best route for the proposed transmission lines is along the existing right of way, please indicate whether Mr. and Mrs. Shiyuk would prefer this to take place using overhead or underground construction, as proposed in BCTC’s Application.

87.2 If the Commission determines that the best option for the proposed transmission lines is overhead construction on the existing right of way, please indicate whether Mr. and Mrs. Shiyuk would prefer this to take place using higher poles, thereby reducing EMFs immediately under the lines, or using shorter poles, presumably reducing visual impacts.

87.3 Please provide colour photographs of Mr. and Mrs. Shiyuk’s backyard that allow a determination to be made of the location of plants and structures and their heights.

88.0 Exhibit C3-19B, Affidavit of Les Ellis sworn October 5, 2005, para. 4

“The power lines were there when we bought the house. The house is built too close to the lines and we had to get a letter of compassion from BC Hydro, guaranteeing that the house would not be torn down. We knew that the power lines were too close to the home when we bought it, but were not aware of any associated health risk.”

88.1 Please confirm that, at the time Mr. and Mrs. Ellis bought the property in question, they were aware of the BC Hydro right of way agreement registered against the title to the property.

88.2 Please advise whether Mr. or Mrs. Ellis reviewed the existing right of way agreement before purchasing their property.

88.3 Please advise whether Mr. or Mrs. Ellis sought any legal advice to confirm BC Hydro’s rights and obligations under the existing right of way agreement. If so, please indicate what that advice was.

88.4 Exhibit C3-19B, Affidavit of Les Ellis sworn October 5, 2005, General

88.5 If the Commission determines that the best route for the proposed transmission lines is along the existing right of way, please indicate whether Mr. and Mrs. Ellis would prefer this to take place using overhead or underground construction, as proposed in BCTC’s
Application.

88.6 If the Commission determines that the best option for the proposed transmission lines is overhead construction on the existing right of way, please indicate whether Mr. and Mrs. Ellis would prefer this to take place using higher poles, thereby reducing EMFs immediately under the lines, or using shorter poles, presumably reducing visual impacts.

88.7 Please provide colour photographs of Mr. and Mrs. Ellis’ backyard that allow a determination to be made of the location of plants and structures and their heights.

89.0 Exhibit C3-19B, Affidavit of Addy Honigman sworn October 5, 2005, para. 3

89.1 Please provide a colour copy of the photograph attached as Exhibit “A” to Mr. Honigman’s Affidavit.

90.0 Exhibit C3-19B, Affidavit of Addy Honigman sworn October 5, 2005, para. 4 and 5

“The power lines were present at the time I purchased the house, but my realtor led me to believe that the lines were only temporary. Several of my neighbours also received similar impressions when they purchased their homes along the right of way.

Furthermore, BC Hydro led me to believe that the lines were Direct Current (“DC”), and were therefore low voltage that would not emit an electromagnetic field (“EMF”). Furthermore, BC Hydro also stated that the lines were not being used at their full capacity on a regular basis.”

90.1 Please indicate whether the above-referenced advice from BC Hydro was provided before or after Mr. Honigman and his partner purchased the property in question. Please identify the person who Mr. Honigman spoke to at BC Hydro and provide copies of all correspondence or communications confirming this communication.

90.2 Please confirm that, at the time Mr. Honigman and his partner bought the property in question, they were aware of the BC Hydro right of way agreement registered against the title to the property.

90.3 Please advise whether Mr. Honigman or his partner reviewed the existing right of way agreement before purchasing their property.

90.4 Please advise whether Mr. Honigman or his partner sought any legal advice to confirm BC Hydro’s rights and obligations under the existing right of way agreement. If so, please indicate what that advice was.

91.0 Exhibit C3-19B, Affidavit of Addy Honigman sworn October 5, 2005, para. 14

“I am strongly opposed to BCTC burying new lines underground. There will be very little decrease in the EMF levels as a result of burying the lines at the depth they propose, and I am worried about spending time in my backyard, either gardening or working in my shop. Furthermore, they are going to ruin my yard by digging the trench, and have said that they are not going to return it to the way it was. I have put a lot of work into my backyard, and I am completely dissatisfied with the stance of BCTC on the issue.”

91.1 If the Commission determines that the best route for the proposed transmission lines is
along the existing right of way, please indicate whether Mr. Honigman and his partner would prefer this to take place using overhead or underground construction, as proposed in BCTC’s Application.

91.2 If the Commission determines that the best option for the proposed transmission lines is overhead construction on the existing right of way, please indicate whether Mr. Honigman and his partner would prefer this to take place using higher poles, thereby reducing EMFs immediately under the lines, or using shorter poles, presumably reducing visual impacts.

92.0 Exhibit C3-19B, Affidavit of Hazel Leake sworn October 5, 2005, para. 3

“I bought the house because it was the right price at the right time. The power lines were here when we purchased it. The realtor advised against buying the house but I did not think much about it at the time. I was not aware of any potential health risks at the time I purchased the house.”

92.1 Please confirm that, at the time Mrs. Leake and her husband bought the property in question, they were aware of the BC Hydro right of way agreement registered against the title to the property.

93.0 Exhibit C3-19B, Affidavit of Hazel Leake sworn October 5, 2005, para. 7

“It does not bother me that I am living here, but the thought of more powerful lines, either above or below the ground, scares me. If BCTC’s current proposal were approved, my property would be a waste land. My pine trees, plum tree, and entire garden would be gone.”

93.1 If the Commission determines that the best route for the proposed transmission lines is along the existing right of way, please indicate whether Mrs. Leake would prefer this to take place using overhead or underground construction, as proposed in BCTC’s Application.

93.2 If the Commission determines that the best option for the proposed transmission lines is overhead construction on the existing right of way, please indicate whether Mrs. Leake would prefer this to take place using higher poles, thereby reducing EMFs immediately under the lines, or using shorter poles, presumably reducing visual impacts.

94.0 Exhibit C3-19B, Affidavit of Hazel Leake sworn October 5, 2005, General

94.1 Please provide colour copies of the photographs attached to Mrs. Leake’s Affidavit.

95.0 Exhibit C3-19B, Affidavit of Kyong Nam sworn October 5, 2005, General

95.1 Please advise if Dr. Nam is a member of TRAHVOL.
96.0 Exhibit C3-19B, Affidavit of Kyong Nam sworn October 5, 2005, para. 14

“I measured the EMFs within my house, and found that the side of the house closest to the power lines is regularly in the 30 to 40 mG range. The EMFs on my balcony, which has a metal railing, is even higher, normally around 50 mG. I have reviewed many studies that, taken together, clearly show that EMFs above the threshold of 4 mG pose risks to human health.”

96.1 Please provide full details of the dates and times of day these measurements were taken, how the measurements were taken, where the readings in the house were taken and the corresponding measurements, and what the EMF readings were outside of the house at the edge of the right of way and underneath the transmission lines at the same time.

97.0 Exhibit C3-19B, Affidavit of Kyong Nam sworn October 5, 2005, para. 18

“We would oppose any proposal to install power lines either overhead or underground along the right of way, as their construction would mean cutting down our fruit trees and tearing up the tennis court.”

97.1 If the Commission determines that the best route for the proposed transmission lines is along the existing right of way, please indicate whether Dr. or Mrs. Nam would prefer this to take place using overhead or underground construction, as proposed in BCTC’s Application.

97.2 If the Commission determines that the best option for the proposed transmission lines is overhead construction on the existing right of way, please indicate whether Dr. or Mrs. Nam would prefer this to take place using higher poles, thereby reducing EMFs immediately under the lines, or using shorter poles, presumably reducing visual impacts.

97.3 Please provide colour photographs of Dr. and Mrs. Nam’s backyard that allow a determination to be made of the location of plants and structures and their heights.

98.0 Exhibit C3-19B, Affidavit of Thelma McMann sworn October 5, 2005, para. 3

“We chose this particular location because it was nice and sunny. The power lines were already on the property, but the property was 1.6 acres at the time so we felt it was large enough even with the power lines. Our realtor explained that BC Hydro had the right of way for about ninety years.”

98.1 Please advise whether Mrs. McMann or her husband reviewed the existing right of way agreement before purchasing their property.

99.0 Exhibit C3-19B, Affidavit of Thelma McMann sworn October 5, 2005, para. 12

“[…] Furthermore, whether new power lines were installed overhead of underground, I felt they would decrease the value of my property significantly.”

99.1 If the Commission determines that the best route for the proposed transmission lines is along the existing right of way, please indicate whether Mrs. McMann would prefer this to take place using overhead or underground construction, as proposed in BCTC’s Application.
99.2 If the Commission determines that the best option for the proposed transmission lines is overhead construction on the existing right of way, please indicate whether Mrs. McMann would prefer this to take place using higher poles, thereby reducing EMFs immediately under the lines, or using shorter poles, presumably reducing visual impacts.

99.3 Please provide colour photographs of Mrs. McMann’s backyard that allow a determination to be made of the location of plants and structures and their heights.

100.0 Exhibit C3-19B, Affidavit of Donald Herbert Horn sworn October 3, 2005, para. 3

“We chose this particular house upon moving from Edmonton. We really liked the neighbourhood. In particular, we were very happy about the size and potential of the yard. While we noticed and asked about the power lines, our realtor reassured us not to worry. In 1970, awareness about adverse effects of EMF was minimal. Also, my boss at work, who lived under similar lines in the British Properties neighbourhood of West Vancouver, told us we had no need to worry as lines such as these were out of date and would ultimately be taken down.”

100.1 Please confirm that, at the time Mr. and Mrs. Horn bought the property in question, they were aware of the BC Hydro right of way agreement registered against the title to the property.

100.2 Please advise whether Mr. or Mrs. Horn reviewed the existing right of way agreement before purchasing their property.

100.3 Please advise whether Mr. or Mrs. Horn sought any legal advice to confirm BC Hydro’s rights and obligations under the existing right of way agreement. If so, please indicate what that advice was.

101.0 Exhibit C3-19B, Affidavit of Donald Herbert Horn sworn October 3, 2005, para. 7

“The expansion proposal would effectively destroy over thirty years of work spent developing our backyard as a refuge and a screen from our neighbours’ properties. My wife and I are stressed and anxious about the BCTC proposal, but are also very angry. We believe that we have consistently been kept in the dark by BCTC, and that we are being asked to bear a hugely disproportionate share of the burden for supplying electricity to Vancouver Island.”

101.1 If the Commission determines that the best route for the proposed transmission lines is along the existing right of way, please indicate whether Mr. and Mrs. Horn would prefer this to take place using overhead or underground construction, as proposed in BCTC’s Application.

101.2 If the Commission determines that the best option for the proposed transmission lines is overhead construction on the existing right of way, please indicate whether Mr. and Mrs. Horn would prefer this to take place using higher poles, thereby reducing EMFs immediately under the lines, or using shorter poles, presumably reducing visual impacts.

101.3 Please provide colour photographs of Mr. and Mrs. Horn’s backyard that allow a determination to be made of the location of plants and structures and their heights.
101.4 Please provide all bases for Mr. Horn's belief that he has consistently been kept in the
dark by BCTC and any supporting documentation.

101.5 Please provide copies of all correspondence and communications between Mr. or Mrs.
Horn and BCTC asking questions or requesting information about the VITR Project.

102.0 Exhibit C3-19B, Affidavit of Kathy Mitchell sworn October 6, 2005, para. 4

“Although the power lines were present at the time, we investigated the matter in depth and
were satisfied that they did not pose a significant health risk. Indeed, we contacted BC Hydro
and were informed that the power lines posed no higher a danger than a radio alarm clock.
Further, the BC Hydro agent we spoke with advised us that the power lines would be removed
at the end of their poles’ useful lives. If we had been aware of more serious health risks or future
development plans for the lines, we would not have chosen this property for our home.”

102.1 Please indicate whether the above-referenced advice from BC Hydro was provided
before or after Mrs. and Mr. Mitchell purchased the property in question. Please identify
the person who Mrs. or Mr. Mitchell spoke to at BC Hydro and provide copies of all
 correspondence or communications confirming this communication.

102.2 Please confirm that, at the time Mrs. and Mr. Mitchell bought the property in question,
they were aware of the BC Hydro right of way agreement registered against the title to
the property.

102.3 Please advise whether Mrs. or Mr. Mitchell reviewed the existing right of way agreement
before purchasing their property.

102.4 Please advise whether Mrs. or Mr. Mitchell sought any legal advice to confirm BC
Hydro’s rights and obligations under the existing right of way agreement. If so, please
indicate what that advice was.

103.0 Exhibit C3-19B, Affidavit of Kathy Mitchell sworn October 6, 2005, General

103.1 Please provide colour photographs of Mrs. and Mr. Mitchell’s backyard that allow a
determination to be made of the location of plants and structures and their heights.

104.0 Exhibit C3-19B, Affidavit of Suzan Egan-Olsen sworn October 5, 2005, para. 10, 11 and 12

“If there were to be overhead lines, the new steel poles would be very ugly. This would
undoubtedly devalue our property by a large amount. I also hate to think about the loss of our
right to use our yard during construction and the damage that will be done to it in the process.
I am totally opposed to the BCTC burying lines in our yard. […]”

104.1 If the Commission determines that the best route for the proposed transmission lines is
along the existing right of way, please indicate whether Mrs. Egan-Olsen and her
husband would prefer this to take place using overhead or underground construction, as
proposed in BCTC’s Application.
104.2 If the Commission determines that the best option for the proposed transmission lines is overhead construction on the existing right of way, please indicate whether Mrs. Egan-Olsen and her husband would prefer this to take place using higher poles, thereby reducing EMFs immediately under the lines, or using shorter poles, presumably reducing visual impacts.

104.3 Please provide colour photographs of Mrs. Egan-Olsen’s backyard that allow a determination to be made of the location of plants and structures and their heights.

105.0 Exhibit C3-19B, Affidavit of Florence Weisser sworn October 5, 2005, para. 4

“The power lines were present when we bought the property, but our realtor told us that they were only temporary, and would be taken down in a few years. There was definitely no discussion of increasing the capacity of the lines, or of burying them or installing new one hundred foot towers. We did not make any inquiries about the hazards associated with having power lines so close to our residence because we had no knowledge of the health risks of electromagnetic fields (“EMF”)."

105.1 Please confirm that, at the time Mrs. Weisser and her husband bought the property in question, they were aware of the BC Hydro right of way agreement registered against the title to the property.

105.2 Please advise whether Mrs. Weisser or her husband reviewed the existing right of way agreement before purchasing their property.

105.3 Please advise whether Mrs. Weisser or her husband sought any legal advice to confirm BC Hydro’s rights and obligations under the existing right of way agreement. If so, please indicate what that advice was.

106.0 Exhibit C3-19B, Affidavit of Florence Weisser sworn October 5, 2005, para. 12 and 13

“I am very opposed to the BCTC burying lines in my backyard. I would have to fence the yard off to keep my dogs and grandchildren off of the lines. […]

The proposal to erect one hundred foot towers is entirely unacceptable. BCTC has avoided difficult questions, such as earthquake preparation and compensation for the diminished value of my property. […]”

106.1 If the Commission determines that the best route for the proposed transmission lines is along the existing right of way, please indicate whether Mrs. Weisser would prefer this to take place using overhead or underground construction, as proposed in BCTC’s Application.

106.2 If the Commission determines that the best option for the proposed transmission lines is overhead construction on the existing right of way, please indicate whether Mrs. Weisser would prefer this to take place using higher poles, thereby reducing EMFs immediately under the lines, or using shorter poles, presumably reducing visual impacts.

106.3 Please provide colour photographs of Mrs. Weisser’s backyard that allow a determination to be made of the location of plants and structures and their heights.
107.0 Exhibit C3-19B, Affidavit of Reginald C. Dawson sworn October 5, 2005, para. 12

“My wife and I are extremely stressed by the BCTC proposal to bury the lines underground because it would make accessing the parking lot of my commercial property virtually impossible and further depreciate the value of my property.”

107.1 If the Commission determines that the best route for the proposed transmission lines is along the existing right of way, please indicate whether Mr. and Mrs. Dawson would prefer this to take place using overhead or underground construction, as proposed in BCTC’s Application.

107.2 If the Commission determines that the best option for the proposed transmission lines is overhead construction on the existing right of way, please indicate whether Mr. and Mrs. Dawson would prefer this to take place using higher poles, thereby reducing EMFs immediately under the lines, or using shorter poles, presumably reducing visual impacts.

107.3 Please provide copies of any correspondence or communications in which Mr. or Mrs. Dawson has raised the above-referenced concern with BCTC.

108.0 Exhibit C3-19B, Affidavit of Glen Page sworn October 5, 2005, para. 4

“The power lines were present at the time, but they were not a big concern. We were told by our realtor that they were backup lines. We never really thought anything of them up until last year when the expansion proposal surfaced.”

108.1 Please confirm that, at the time Mr. and Mrs. Page bought the property in question, they were aware of the BC Hydro right of way agreement registered against the title to the property.

108.2 Please advise whether Mr. and Mrs. Page reviewed the existing right of way agreement before purchasing their property.

108.3 Please advise whether Mr. or Mrs. Page sought any legal advice to confirm BC Hydro’s rights and obligations under the existing right of way agreement. If so, please indicate what that advice was.

109.0 Exhibit C3-19B, Affidavit of Glen Page sworn October 5, 2005, para. 5

109.1 Please provide colour copies of the photographs attached as Exhibit “A” to Mr. Page’s Affidavit.

110.0 Exhibit C3-19B, Affidavit of Glen Page sworn October 5, 2005, para. 9

“We are extremely worried and unhappy at the prospect of being forced to move against our will as a result of BCTC’s plans. If our garden were to be torn up or if new overhead lines were installed, we would have to consider moving. This would depend on the presumably reduced value of our home. To lose our garden would be heartbreaking. At the same time, if new aerial
lines were put up, we would be very worried about the health effects and the impacts these would have on ourselves and, especially, our younger visitors including grandchildren."

110.1 If the Commission determines that the best route for the proposed transmission lines is along the existing right of way, please indicate whether Mr. and Mrs. Page would prefer this to take place using overhead or underground construction, as proposed in BCTC’s Application.

110.2 If the Commission determines that the best option for the proposed transmission lines is overhead construction on the existing right of way, please indicate whether Mr. and Mrs. Page would prefer this to take place using higher poles, thereby reducing EMFs immediately under the lines, or using shorter poles, presumably reducing visual impacts.

111.0 Exhibit C3-19B, Affidavit of Fred Ogden sworn October 5, 2005, para. 3

111.1 Please provide a colour copy of the photograph attached as Exhibit “A” to Mr. Ogden’s Affidavit.

112.0 Exhibit C3-19B, Affidavit of Fred Ogden sworn October 5, 2005, para. 4

“The power lines were present at the time we bought the house. As a UBC math and physics graduate, I know that varying electromagnetic fields (that can transmit energy to nearby conductors: the human body is a good conductor) are radiated from AC power lines at 60 Hz, but that DC power lines generate only steady state electric and magnetic fields, which do not transmit energy to nearby conductors, and therefore pose less danger to humans. To determine whether living near the lines would be safe for my family, I made enquiries to BC Hydro in January 1983 regarding the nature of the lines. A BC Hydro engineer advised me that the lines running through the property were DC lines. Based on this representation, my wife and I were satisfied that the power lines would pose no danger to our young children and we purchased the house.”

112.1 Please identify the person who Mr. Ogden spoke to at BC Hydro and provide copies of all correspondence or communications confirming this communication.

112.2 Please confirm that, at the time Mr. and Mrs. Ogden bought the property in question, they were aware of the BC Hydro right of way agreement registered against the title to the property.

112.3 Please advise whether Mr. or Mrs. Ogden reviewed the existing right of way agreement before purchasing their property.

112.4 Please advise whether Mr. or Mrs. Ogden sought any legal advice to confirm BC Hydro’s rights and obligations under the existing right of way agreement. If so, please indicate what that advice was.

113.0 Exhibit C3-19B, Affidavit of Fred Ogden sworn October 5, 2005, para. 15

“We also do not want our backyard ripped up to bury the lines, as we would be forced to remove the apple, plum, pear and cherry trees we have enjoyed since we bought the house.”
113.1 If the Commission determines that the best route for the proposed transmission lines is along the existing right of way, please indicate whether Mr. and Mrs. Ogden would prefer this to take place using overhead or underground construction, as proposed in BCTC’s Application.

113.2 If the Commission determines that the best option for the proposed transmission lines is overhead construction on the existing right of way, please indicate whether Mr. and Mrs. Ogden would prefer this to take place using higher poles, thereby reducing EMFs immediately under the lines, or using shorter poles, presumably reducing visual impacts.

114.0 Exhibit C3-19B, Affidavit of Les Malzseniczky sworn October 5, 2005, para. 3 to 7

“We chose to buy this particular house because of the large backyard. While we were looking for a home to purchase, we did not consider those along the right of way at first because we were concerned about the power lines. We were very interested in the large lot of this particular property, however, so we contacted BC Hydro for information about the lines and the utility’s future plans for the corridor.

We asked BC Hydro to explain what a right of way is. The representative told us that it simply meant that BC Hydro had a right to enter our property to maintain the lines and trim the vegetation so it did not touch the wires.

We also asked if there were restrictions on what we could build under the wires. We were told that we could build no permanent structures beneath the wires.

BC Hydro also explained to us that the lines were only used as a backup means of transmitting power. I specifically asked if there were any plans to upgrade or change the powerlines in any way in the near future and was told there were no plans to do so.

It was on the basis of those representations that we decided to purchase the home.”

114.1 Please identify the person who provided this advice from BC Hydro and provide copies of all notes of this communication and correspondence or communications confirming this communication.

114.2 Please provide a copy of the Interim Agreement or other Agreement between Mr. Malzseniczky and his wife and the vendors of the property in question when the subject property was purchased.

114.3 Please confirm that, at the time Mr. Malzseniczky and his wife bought the property in question, they were aware of the BC Hydro right of way agreement registered against the title to the property.

114.4 Please advise whether Mr. Malzseniczky or his wife reviewed the existing right of way agreement before purchasing their property.

114.5 Please advise whether Mr. Malzseniczky and his wife sought any legal advice to confirm BC Hydro’s rights and obligations under the existing right of way agreement. If so, please indicate what that advice was.
115.0  Exhibit C3-19B, Affidavit of Les Malzensiczky sworn October 5, 2005, para. 10

“When we discovered that the lines are not merely used as a backup system, we became very concerned about the health risks.”

115.1 Please indicate when and how Mr. Malzensiczky and his wife became aware that the existing transmission lines are not merely used as a backup system.

116.0  Exhibit C3-19B, Affidavit of Les Malzensiczky sworn October 5, 2005, para. 11

“The alternative proposal to bury the lines concerns us, as we are aware that the BCTC intends to use both the underground and the aerial lines for several years. Our yard would become useless for us, as we would not feel comfortable allowing our friends and family to be exposed to the electromagnetic field.”

116.1 If the Commission determines that the best route for the proposed transmission lines is along the existing right of way, please indicate whether Mr. Malzensiczky and his wife would prefer this to take place using overhead or underground construction, as proposed in BCTC’s Application.

116.2 If the Commission determines that the best option for the proposed transmission lines is overhead construction on the existing right of way, please indicate whether Mr. Malzensiczky and his wife would prefer this to take place using higher poles, thereby reducing EMFs immediately under the lines, or using shorter poles, presumably reducing visual impacts.

116.3 Please provide colour photographs of Mr. Malzensiczky’s backyard that allow a determination to be made of the location of plants and structures and their heights.

117.0  Exhibit C3-19B, Affidavit of Les Malzensiczky sworn October 5, 2005, para. 16

“My wife and I are extremely frustrated by this process. We feel that BCTC and BC Hydro have lied to us on numerous occasions. […]”

117.1 Please provide all instances that Mr. Malzensiczky relies on for his belief that BCTC has lied to him and his wife and any supporting documentation.

118.0  Exhibit C3-19B, Affidavit of Guenter Schreiber sworn October 5, 2005, para. 4 and 5

“We purchased this particular property because of its park-like setting. However, we were concerned at the time about the appearance of the power lines at the rear of the property.

At the time we purchased the property, the real estate agent indicated that the power lines were used only to supply power in peak periods. There was no discussion of electromagnetic fields at that time.”

118.1 Please confirm that, at the time Mr. and Mrs. Schreiber bought the property in question, they were aware of the BC Hydro right of way agreement registered against the title to the property.
118.2 Please advise whether Mr. and Mrs. Schreiber reviewed the existing right of way agreement before purchasing their property.

118.3 Please advise whether Mr. and Mrs. Schreiber sought any legal advice to confirm BC Hydro’s rights and obligations under the existing right of way agreement. If so, please indicate what that advice was.

119.0 Exhibit C3-19B, Affidavit of Guenter Schreiber sworn October 5, 2005, para. 10

“I am concerned with the ground and vegetation disturbance that will occur with the process of burying the power line. I am also concerned that the buried power line will decrease my property value.”

119.1 If the Commission determines that the best route for the proposed transmission lines is along the existing right of way, please indicate whether Mr. and Mrs. Schreiber would prefer this to take place using overhead or underground construction, as proposed in BCTC’s Application.

119.2 If the Commission determines that the best option for the proposed transmission lines is overhead construction on the existing right of way, please indicate whether Mr. and Mrs. Schreiber would prefer this to take place using higher poles, thereby reducing EMFs immediately under the lines, or using shorter poles, presumably reducing visual impacts.

119.3 Please provide colour photographs of Mr. and Mrs. Schreiber’s backyard that allow a determination to be made of the location of plants and structures and their heights.

120.0 Exhibit C3-19B, Affidavit of John Bulloch sworn October 3, 2005, para. 4

“The power lines were present at the time, but we were told that they were merely backup lines that would ultimately be removed.”

120.1 Please indicate whether this discussion took place prior to or after Mr. Bulloch and his wife purchased the property in question.

120.2 Please indicate who informed Mr. and Mrs. Bulloch that the power lines were merely backup lines and that they would ultimately be removed. Please identify who provided this advice and provide any written record of this communication and copies of all correspondence or other documentation confirming this communication.

120.3 Please confirm that, at the time Mr. Bulloch and his wife bought the property in question, they were aware of the BC Hydro right of way agreement registered against the title to the property.

120.4 Please advise whether Mr. Bulloch or his wife reviewed the existing right of way agreement before purchasing their property.

120.5 Please advise whether Ms. Boyce or her husband sought any legal advice to confirm BC Hydro’s rights and obligations under the existing right of way agreement. If so, please indicate what that advice was.
121.0 Exhibit C3-19B, Affidavit of John Bulloch sworn October 3, 2005, para. 6

121.1 Please provide colour copies of the photographs attached as Exhibit “A”.

122.0 Exhibit C3-19B, Affidavit of John Bulloch sworn October 3, 2005, para. 9

“The proposal to bury the lines would destroy the work we have put into our garden. I do not believe that BCTC will fix this damage or properly install the power lines to minimize EMF exposure. Aerial lines are not a viable alternative. While they will leave the garden intact, they raise enormous health questions for us, and will severely impact our home’s market value.”

122.1 If the Commission determines that the best route for the proposed transmission lines is along the existing right of way, please indicate whether Mr. and Mrs. Bulloch would prefer this to take place using overhead or underground construction.

122.2 If the Commission determines that the best option for the proposed transmission lines is overhead construction on the existing right of way, please indicate whether Mr. or Mrs. Bulloch would prefer this to take place using higher poles, thereby reducing EMFs immediately under the lines, or using shorter poles, presumably reducing visual impacts.

123.0 Exhibit C3-19B, Affidavit of Wendy Childs sworn October 5, 2005, para. 7

“Although we made the choice to live in a house in close proximity to power lines, we were led to believe they were and would continue to be low voltage.”

123.1 Please indicate the person who led you to believe that the powerlines would continue to be low voltage.

123.2 Please provide copies of all correspondence or other communications indicating that the powerlines would continue to be low voltage.

123.3 Please advise whether Mrs. or Mr. Childs reviewed the existing right of way agreement before purchasing their property.

123.4 Please advise whether Mrs. or Mr. Childs sought any legal advice to confirm BC Hydro’s rights and obligations under the existing right of way agreement. If so, please indicate what that advice was.

124.0 Exhibit C3-19B, Affidavit of Wendy Childs sworn October 5, 2005, para. 10

“Initially, we were very pleased with the BCTC, as they appeared to be working with TRAHVOL to find a solution to this problem. I soon felt mislead by BCTC, however. In my view, they have misrepresented themselves and the situation from the beginning.”

124.1 Please indicate how you feel BCTC has misrepresented themselves and the situation from the beginning and provide any supporting documentation.

125.0 Exhibit C3-19B, Affidavit of Wendy Childs sworn October 5, 2005, General

125.1 If the Commission determines that the best route for the proposed transmission lines is
along the existing right of way, please indicate whether Mrs. and Mr. Childs would prefer this to take place using overhead or underground construction.

125.2 If the Commission determines that the best option for the proposed transmission lines is overhead construction on the existing right of way, please indicate whether Mrs. and Mr. Childs would prefer this to take place using higher poles, thereby reducing EMFs, or using shorter poles, presumably reducing visual impacts.

125.3 Please provide colour photographs of Mrs. and Mr. Child’s backyard that allow a determination to be made of the location of plants and structures and their heights.

126.0 Exhibit C3-19B, Affidavit of Shari Boyce sworn October 5, 2005, para. 4

“As the power lines were present when we bought the house, my husband telephoned BC Hydro to inquire about their safety. A BC Hydro representative informed him that the electromagnetic field (“EMF”) in the vicinity of the poles was similar in strength to that near a refrigerator. My husband was also told that the lines would eventually be taken down and removed. Our realtor, George Ayling, further advised us that the power lines would be taken down at some point in the future.”

126.1 Please indicate whether this discussion took place prior to or after Ms. Boyce and her husband purchased the property in question.

126.2 Please provide the name of the person from BC Hydro who provided this advice and provide any written record of this communication and copies of all correspondence or other documentation confirming this communication.

126.3 Please confirm that, at the time Ms. Boyce and her husband bought the property in question, that she was aware of the BC Hydro right of way agreement registered against the title to the property.

126.4 Please advise whether Ms. Boyce or her husband reviewed the existing right of way agreement before purchasing their property.

126.5 Please advise whether Ms. Boyce or her husband sought any legal advice to confirm BC Hydro’s rights and obligations under the existing right of way agreement. If so, please indicate what that advice was.

127.0 Exhibit C3-19B, Affidavit of Shari Boyce sworn October 5, 2005, para. 8

127.1 Please provide colour copies of the photographs attached as Exhibit “A”.

128.0 Exhibit C3-19B, Affidavit of Shari Boyce sworn October 5, 2005, para. 9

“I am opposed to the proposal to bury any new high voltage lines for a number of reasons.”

128.1 If the Commission determines that the best route for the proposed transmission lines is along the existing right of way, please indicate whether Ms. Boyce would prefer this to take place using overhead or underground construction.
128.2 If the Commission determines that the best option for the proposed transmission lines is overhead construction on the existing right of way, please indicate whether Ms. Boyce would prefer this to take place using higher poles, thereby reducing EMFs immediately under the lines, or using shorter poles, presumably reducing visual impacts.

129.0 Exhibit C3-19B, Affidavit of Karen Sweet sworn October 5, 2005, para. 4

“The power lines were present when we bought the home. There was no real estate agent involved and we did not hear anything about the power lines when we bought the home. When my parents bought the home in 1967 or 1968 they were told that the lines would come down at some point. They purchased the home through DVA (Department of Veteran’s Affairs) who had been told the lines would be coming down. That was the impression I have been under all this time – that the lines would be removed when they were no longer useful.”

129.1 Please provide any written record of these communications and copies of all correspondence or other documentation confirming these communications.

129.2 Please confirm that, at the time Mrs. Sweet and her husband bought the property in question, they were aware of the BC Hydro right of way agreement registered against the title to the property.

129.3 Please advise whether Mrs. Sweet or her husband reviewed the existing right of way agreement before purchasing their property.

129.4 Please advise whether Mrs. Sweet or her husband sought any legal advice to confirm BC Hydro’s rights and obligations under the existing right of way agreement. If so, please indicate what that advice was.

130.0 Exhibit C3-19B, Affidavit of Karen Sweet sworn October 5, 2005, para. 5

130.1 Please provide colour copies of the photographs attached as Exhibit “A” to Mrs. Sweet’s Affidavit.

131.0 Exhibit C3-19B, Affidavit of Karen Sweet sworn October 5, 2005, para. 11 and 12

“I would not be happy with burying the lines, as they would not be insulated from what I understand and the higher voltage would still be going through our backyard. […]

I am also very upset about the prospect of installing huge steel poles. The current wood poles tend to blend in with the rest of the lot, but everyone would notice the much taller metal poles. […]”

131.1 If the Commission determines that the best route for the proposed transmission lines is along the existing right of way, please indicate whether Mrs. Sweet and her husband would prefer this to take place using overhead or underground construction.
If the Commission determines that the best option for the proposed transmission lines is overhead construction on the existing right of way, please indicate whether Mrs. Sweet and her husband would prefer this to take place using higher poles, thereby reducing EMFs immediately under the lines, or using shorter poles, presumably reducing visual impacts.

Exhibit C3-19B, Affidavit of Doug Adams sworn October 11, 2005, para. 4

“At the time we bought the house, we were aware of the power lines in the backyard.”

Please confirm that, at the time Mr. and Mrs. Adams bought their house, they were also aware of the BC Hydro right of way agreement registered against the title to the property.

Exhibit C3-19B, Affidavit of Doug Adams sworn October 11, 2005, para. 4

“I have measured the EMF in the house to be as high as 10 to 15 mG.”

Please provide full details of the date and time of day these measurements were taken, how the measurements were taken, where the readings in the house were taken and the corresponding measurements, and what the EMF readings were outside of the house at the edge of the right of way and underneath the transmission lines at the same time.

Exhibit C3-19B, Affidavit of Doug Adams sworn October 11, 2005, para. 10

“If BCTC could guarantee that the lines could be buried safely along the right of way, in a manner that would minimize the EMF beyond what is presently projected, then I would be less upset, although, as below, underground lines would still destroy our backyard. I am adamantly opposed to the burial of lines without a guarantee of very low EMF levels. I am also strongly opposed to any new overhead lines.

If the Commission determines that the best route for the proposed transmission lines is along the existing right of way, please indicate whether Mr. and Mrs. Adams would prefer this to take place using overhead or underground construction (as proposed in BCTC’s Application).

If the Commission determines that the best option for the proposed transmission lines is overhead construction on the existing right of way, please indicate whether Mr. and Mrs. Adams would prefer this to take place using higher poles, thereby reducing EMFs immediately under the lines, or using shorter poles, presumably reducing visual impacts.

Exhibit C3-19B, Affidavit of Doug Adams sworn October 11, 2005, Exhibit “A”

Please provide colour copies of the photographs attached as Exhibit “A”.

Exhibit C3-19B, Affidavit of Doug Adams sworn October 11, 2005, Exhibit “A”
136.0 Exhibit C3-19B, Affidavit of Shirley Hanken sworn October 3, 2005, para. 4

“The power lines were present when we moved in. The real estate agent mentioned that there was an easement, but we were unsure exactly what kind of easement it was. […]”

136.1 Please advise whether Mrs. or Mr. Hanken reviewed the existing easement agreement before purchasing their property.

136.2 Please advise whether Mrs. or Mr. Hanken sought any legal advice to confirm BC Hydro’s rights and obligations under the existing easement agreement. If so, please indicate what that advice was.

137.0 Exhibit C3-19B, Affidavit of Shirley Hanken sworn October 3, 2005, para. 6

137.1 Please provide colour copies of the photographs attached as Exhibit “A” to Mrs. Hanken’s Affidavit.

138.0 Exhibit C3-19B, Affidavit of Shirley Hanken sworn October 3, 2005, para. 11 and 12

“If the lines were buried it would devastate our garden. […] The overhead lines would be a terrible thing to do to our small community. […]"

138.1 If the Commission determines that the best route for the proposed transmission lines is along the existing right of way, please indicate whether Mrs. and Mr. Hanken would prefer this to take place using overhead or underground construction.

138.2 If the Commission determines that the best option for the proposed transmission lines is overhead construction on the existing right of way, please indicate whether Mrs. and Mr. Hanken would prefer this to take place using higher poles, thereby reducing EMFs immediately under the lines, or using shorter poles, presumably reducing visual impacts.

139.0 Exhibit C3-19B, Affidavit of Ray Mattei sworn October 5, 2005, para. 4

“The power lines were present at the time, but they were not a big concern. We were told by our realtor, Mr. Poole, that the lines were antique lines, and rarely used as backup lines. He showed us some documents and articles relating to EMF issues that suggested there were no health concerns to worry about. He did state that they would be taken down in the future. Before we bought the property I also talked to the firemen from the firehall directly behind our lot. They also told us that the lines were supposed to be taken down at some time. We decided to go ahead with the purchase, believing that there were no risks to our health, and that the right-of-way on our property was strictly aerial.”

139.1 Please confirm that, at the time Mr. and Mrs. Mattei bought the property in question, they were aware of the BC Hydro right of way agreement registered against the title to the property.

139.2 Please advise whether Mr. or Mrs. Mattei reviewed the existing right of way agreement before purchasing their property.

139.3 Please advise whether Mr. or Mrs. Mattei sought any legal advice to confirm BC Hydro’s
rights and obligations under the existing right of way agreement. If so, please indicate what that advice was.

140.0 Exhibit C3-19B, Affidavit of Ray Mattei sworn October 5, 2005, para. 8

140.1 Please provide colour copies of the photographs attached to Mr. Mattei’s Affidavit as Exhibit “A”.

141.0 Exhibit C3-19B, Affidavit of John Cross sworn October 18, 2005, para. 5 and 6

“Our property adjoins the BC Hydro right of way, situated to the east of it.

We were not concerned at the proximity of the existing power lines at the time we purchased the house, since no-one in the whole sales process made any mention of any concerns, and we were not aware of any of the issues that are currently of concern.”

141.1 Please advise whether Mr. or Mrs. Cross obtained a copy of and reviewed the existing right of way agreement before purchasing their property.

141.2 Please advise whether Mr. or Mrs. Cross sought any legal advice to confirm BC Hydro’s rights and obligations under the existing right of way agreement. If so, please indicate what that advice was.

142.0 Exhibit C3-19B, Affidavit of John Cross sworn October 18, 2005, General

142.1 Please indicate whether Mr. Cross and his wife are members of TRAHVOL.

143.0 Exhibit C3-19B, Affidavit of Mark Warwarick sworn October 6, 2005, para. 4

“The power lines were present when I moved in, and were my major concern about the house. I was told by my realtor and by my lawyer that the lines were a backup system, that this system was low voltage, and that it was not on all the time. With this information, I thought the lines were safe. I did not make any further enquiries to BCTC, but I did not receive full disclosure that the project to upgrade the voltage had been ongoing since 1995.”

143.1 Please confirm that, at the time Mr. Warwarick bought the property in question, he was aware of the BC Hydro right of way agreement registered against the title to the property.

143.2 Please advise whether Mr. Warwarick reviewed the existing right of way agreement before purchasing his property.

143.3 Please advise whether Mr. Warwarick sought any legal advice to confirm BC Hydro’s rights and obligations under the existing right of way agreement. If so, please indicate what that advice was.

144.0 Exhibit C3-19B, Affidavit of Mark Warwarick sworn October 6, 2005, para. 7

“If BCTC were to put underground lines in, my yard would be ruined. I would lose about 70 feet of space, which is quite a lot considering that I purchased the home for the big yard. My orchard
would be ruined, and I could no longer plant any more trees because of the underground restrictions. I certainly would not allow the dogs out in the backyard, and I would not use the backyard, either. I would be too worried about the effects of radiation from the unshielded lines.”

144.1 If the Commission determines that the best route for the proposed transmission lines is along the existing right of way, please indicate whether Mr. Warwarick would prefer this to take place using overhead or underground construction.

144.2 If the Commission determines that the best option for the proposed transmission lines is overhead construction on the existing right of way, please indicate whether Mr. Warwarick would prefer this to take place using higher poles, thereby reducing EMFs immediately under the lines, or using shorter poles, presumably reducing visual impacts.

144.3 Please provide colour photographs of Mr. Warwarick’s backyard that allow a determination to be made of the location of plants and structures and their heights.

145.0 Exhibit C3-19B, Affidavit of Cliff Holman sworn October 5, 2005, para. 12

“If the proposal to bury new higher voltage power lines were to go through, it would completely destroy the landscaping in our yard. BCTC would put the grass back, but I would have to start over with my grapevines, which are 6 years old, and with my apple and pear trees, which are over 10 years old. […]”

145.1 If the Commission determines that the best route for the proposed transmission lines is along the existing right of way, please indicate whether Mr. and Mrs. Hoffman would prefer this to take place using overhead or underground construction.

145.2 If the Commission determines that the best option for the proposed transmission lines is overhead construction on the existing right of way, please indicate whether Mr. and Mrs. Hoffman would prefer this to take place using higher poles, thereby reducing EMFs immediately under the lines, or using shorter poles, presumably reducing visual impacts.

146.0 Exhibit C3-19B, Affidavit of Pam Sutherland sworn October 5, 2005, General

146.1 Please provide colour photographs of Mr. and Mrs. Hoffman’s backyard that allow a determination to be made of the location of plants and structures and their heights.

147.0 Exhibit C3-19B, Affidavit of John Alexander (Sandy) McDonald sworn October 5, 2005, para. 12

“We are upset over the proposal. We do not like having this uncertainty with respect to what may happen to our home. We do not want the new proposal to go ahead. The construction will certainly be an inconvenience and would destroy the backyard. We have turned the yard into an orchard with a number of peach, pear and apple trees. The proposed area for burying the lines is precisely where our trees are. We are concerned that the orchard would be ruined. The
uncertainty of the current situation upsets us very much."

147.1 If the Commission determines that the best route for the proposed transmission lines is along the existing right of way, please indicate whether Mr. and Mrs. McDonald would prefer this to take place using overhead or underground construction.

147.2 If the Commission determines that the best option for the proposed transmission lines is overhead construction on the existing right of way, please indicate whether Mr. and Mrs. McDonald would prefer this to take place using higher poles, thereby reducing EMFs immediately under the lines, or using shorter poles, presumably reducing visual impacts.

147.3 Please provide colour photographs of Mr. and Mrs. McDonald's backyard that allow a determination to be made of the location of plants and structures and their heights.

148.0 Exhibit C3-19B, Affidavit of Hardave Parhar sworn October 6, 2005, para. 3

“The power lines were present at the time we purchased the house, but we were not concerned about them intersecting our property. Indeed, the realtor we first dealt with brought a device to measure the EMF levels, and the realtor assured us that the EMF readings near the house were insignificant. We inquired about the long-term plans for the power lines prior to purchasing the house, and BC Hydro said at that time that there was no intention to bury the lines. BC Hydro stated that the lines were used occasionally to supply overflow power to the Gulf Islands, and the utility did not say that the lines were used to transmit power to Vancouver Island. BC Hydro stated that if there was any change in the status quo, it would be to get rid of the lines.”

148.1 Please provide the name of the BC Hydro representative who provided this advice and provide any written record of these communications and copies of all correspondence or other documentation confirming these communications.

148.2 Please confirm that, at the time Ms. Parhar and her husband bought the property in question, they were aware of the BC Hydro right of way agreement registered against the title to the property.

148.3 Please advise whether Ms. Parhar or her husband reviewed the existing right of way agreement before purchasing their property.

148.4 Please advise whether Ms. Parhar or her husband sought any legal advice to confirm BC Hydro’s rights and obligations under the existing right of way agreement. If so, please indicate what that advice was.

149.0 Exhibit C3-19B, Affidavit of Hardave Parhar sworn October 6, 2005, para. 6

“If BCTC went forward with the proposal to bury the new and more powerful lines, or if it added new overhead lines, we would be very upset about the potentially increased health risks, the damage to our yard, and the greatly reduced value of our property. In fact, we challenged our recent BC Assessment Authority assessment of our property, and they reduced the assessed value of our home by $85,000 due to the presence of the power lines alone.”

149.1 If the Commission determines that the best route for the proposed transmission lines is along the existing right of way, please indicate whether Ms. Parhar and Mr. Bhatti would
prefer this to take place using overhead or underground construction.

149.2 If the Commission determines that the best option for the proposed transmission lines is overhead construction on the existing right of way, please indicate whether Ms. Parhar and Mr. Bhatti would prefer this to take place using higher poles, thereby reducing EMFs immediately under the lines, or using shorter poles, presumably reducing visual impacts.

149.3 Please provide colour photographs of Ms. Parhar and Mr. Bhatti's backyard that allow a determination to be made of the location of plants and structures and their heights.

150.0 Exhibit C3-19B, Affidavit of Lorraine Baker sworn October 5, 2005, para. 4

“The power lines were present when I bought my home, but no information about them was disclosed to me at the time of purchase. It seemed like a hush-hush situation. I knew the right of way existed, but I was not informed of anything beyond that. Even my realtor did not appear to know anything about it.”

150.1 Please confirm that, at the time Ms. Baker bought her house she was aware of the BC Hydro right of way agreement registered against the title to the property.

150.2 Please advise whether Ms. Baker reviewed the existing right of way agreement before purchasing her property.

150.3 Please advise whether Ms. Baker sought any legal advice to confirm BC Hydro’s rights and obligations under the existing right of way agreement. If so, please indicate what that advice was.

151.0 Exhibit C3-19B, Affidavit of Lorraine Baker sworn October 5, 2005, para 8

“I feel very deceived by this entire process. Before the last election, we residents were assured that new lines would not be installed. However, after the election we were told not only that new lines might be installed, but that we might have to pay for some of the costs of the installation if the lines were put underground.”

151.1 Please provide copies of all correspondence or communications from BCTC assuring the residents that new lines would not be installed.

151.2 Please confirm that Ms. Baker is referring to the costs of advancing the second underground circuit. If not, please indicate what costs Ms. Baker is referring to and provide copies of all documents indicating that residents might be responsible for these costs if the lines were put underground.

152.0 Exhibit C3-19B, Affidavit of Lorraine Baker sworn October 5, 2005, para 10

“There was a lot of work to do because the previous owner had not tended his yard and it was completely overgrown. There were entire trees that needed to be removed. I put in a whole new lawn. A lot of hard work and money has gone into my garden.”

152.1 Please indicate whether Ms. Baker contacted BCTC or BC Hydro prior to undertaking this work. If so, please indicate when that communication took place and provide copies of all correspondence or other communications confirming that communication.
152.2 Please provide colour photographs of Ms. Baker’s backyard that allow a determination to be made of the location of plants and structures and their heights.

153.0 Exhibit C3-19B, Affidavit of Lorraine Baker sworn October 5, 2005, para. 14

“I do not want BCTC to bury the lines. Nor do I want them installing larger overhead lines.”

153.1 If the Commission determines that the best route for the proposed transmission lines is along the existing right of way, please indicate whether Ms. Baker would prefer this to take place using overhead or underground construction.

153.2 If the Commission determines that the best option for the proposed transmission lines is overhead construction on the existing right of way, please indicate whether Ms. Baker would prefer this to take place using higher poles, thereby reducing EMFs immediately under the lines, or using shorter poles, presumably reducing visual impacts.

154.0 Exhibit C3-19B, Affidavit of Earl Bowling sworn October 5, 2005, para. 2 and 3

“My wife, Pearl Bowling, and I have lived in this home continuously since December 1957. […] The power lines were not present when we built this home.”

154.1 The first of the 138 kV circuits was installed and activated in 1956. Please reconcile this with the referenced statement.

155.0 Exhibit C3-19B, Affidavit of Earl Bowling sworn October 5, 2005, General

155.1 If the Commission determines that the best route for the proposed transmission lines is along the existing right of way, please indicate whether Mr. and Mrs. Bowling would prefer this to take place using overhead or underground construction.

155.2 If the Commission determines that the best option for the proposed transmission lines is overhead construction on the existing right of way, please indicate whether Mr. or Mrs. Bowling would prefer this to take place using higher poles, thereby reducing EMFs immediately under the lines, or using shorter poles, presumably reducing visual impacts.

155.3 Please provide colour photographs of Mr. and Mrs. Bowling’s backyard that allow a determination to be made of the location of plants and structures and their heights.

156.0 Exhibit C3-19B, Affidavit of Lesley Cecchetto sworn October 5, 2005, para. 4

“No one mentioned anything about them, except that there was an easement.”

156.1 Please advise whether Mrs. or Mr. Cecchetto reviewed the existing right of way agreement before purchasing their property.

157.0 Exhibit C3-19B, Affidavit of Lesley Cecchetto sworn October 5, 2005, para. 8

“If BCTC buried the new higher voltage power lines along the current right of way, it would take out the whole yard, and we could not grow anything on it. Our garden would be gone. Our
greenhouse is right on the path, and it would be gone too. If they put in the overhead lines, then the steel posts would be an eyesore."

157.1 If the Commission determines that the best route for the proposed transmission lines is along the existing right of way, please indicate whether Mrs. and Mr. Cecchetto would prefer this to take place using overhead or underground construction.

157.2 If the Commission determines that the best option for the proposed transmission lines is overhead construction on the existing right of way, please indicate whether Mrs. or Mr. Cecchetto would prefer this to take place using higher poles, thereby reducing EMFs immediately under the lines, or using shorter poles, presumably reducing visual impacts.

157.3 Please provide colour photographs of Mrs. and Mr. Cecchetto’s backyard that allow a determination to be made of the location of plants and structures and their heights.

158.0 Exhibit C3-19B, Affidavit of Maureen Broadfoot #2 sworn October 19, 2005, Affidavit of Maureen Broadfoot #3 sworn October 19, 2005

158.1 Please provide a copy of all materials that TRAHVOL has distributed to its members on the VITR, Vancouver Island Cable or Juan de Fuca projects.