

BC HYDRO - 2008 LTAP

EXHIBIT

C5-1

**VANPORT STERILIZERS INC.**

by fax transmission to (604) 660 1102
total No. of pages , including cover, 2 (two)

19, June 2008

**BC Utilities Commission
Sixth Floor, 900 Howe Street
Vancouver, BC
V6Z 2N3**

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JUN 19 2008**ATTN. Ms. Erica Hamilton, Commission Secretary**

Routing _____

RE; Application for Intervenor Status, BC Hydro - 2008 LTAP

With regard to the BC Hydro 2008 Long Term Acquisition Plan and to the conclusions stated in the attached Appendix F4a and, in Appendix F4b, please be advised that VPS does not agree with the conclusions and plans to challenge them on the basis that,

1), no meaningful review could be achieved by focusing the scope of the sewage treatment analysis on the 1992 Acres Engineering Letter Report, a report which itself was based on a arbitrary re-design of the original 1990 proposal, and all of which has been superceded by more recent developments.

2), there is no basis to the conclusion that the project could not adjust to a municipal wastewater production flow regime. In fact, the problems of the deficit of off-peak storage capacity and also of on-peak flow capacity were solved with the proposed staged development option, and, by VPS identifying new routes, new storage sites and new treatment methods.

3), there is no basis to the conclusion that the project would have a net negative energy impact on the BC Hydro system as the required base-load generation could be secured on a self-financed basis from a project-owned and operated plant that could also sell its surplus to BC Hydro. This generation could also be supplemented with surplus hydropower generated during the freshet, and/or, by generation obtained on the open market from plants not contracted to BC Hydro.

2.

4), there is no basis to the conclusion that it would make sense to sell 'zero-emission' power first to BC Hydro as the review ignored any discussion of critical power marketing issues relevant to pumped hydro.

5), there is no basis to the conclusion that the length-to-head ratio of any of the JHRP storages is unacceptable as any estimate of the 'ideal' ratio would have to account for the fact that none of the input costs of the recycle infrastructure would be borne by BC Hydro.

6), there is no basis to the conclusion that the Jordan River would suffer severely by our proposed inputs of seawater. In fact, our proposal is to build an Ocean Pumped Hydro storage plant in the 'Forebay' area that would be operated largely independent of both the JRHP and the Jorvic SRP, with a portion of the OPH storage also diverted to support a series of land-based fish farms feeding their effluent into Epcor's Sooke STP.

VPS has now recognized that any evaluation of the Jorvic SRP as a conventional pumped storage hydro project is doomed to fail, both because the project is not a conventional storage scheme, and, because it can be designed to operate as a merchant plant that can effectively compete with BC Hydro, and, in this respect, we reiterate our belief that BC Hydro has abused its monopoly and acted to prevent competition by deliberately restricting the scope of these reviews, as well as acting to prevent our participation in them, thereby costing VPS the loss of significant economic opportunities related to early development of merchant pumped storage hydro plants (including at Britannia Mines).

Therefore, we respectfully request registration as an Intervenor in this proceeding with a view to securing an order that provides funding to a qualified independent consultant who engages VPS in a comprehensive review of the Jorvic pipeline, its targeted energy market(s) and related projects.

Thank you for your consideration.


Richard Tennant, President