

June 11, 2009

From:

Burke Mountain Naturalists
RPO Box 52540 Coquitlam Centre
Coquitlam, BC V3B 7J4

To:

Erica Hamilton, Commission Secretary, BCUC
commissionsecretary@bcuc.com

**Re: BCUC Section 5 Transmission Inquiry
Commission Staff Discussion Draft on Scope**

The Burke Mountain Naturalists offer the following comments.

1. We are pleased to see this inquiry take place as it is very important for BCUC to provide assurance that future electricity transmission facilities will be built in a timely and efficient manner to best meet the future needs of BC residents while also assuring minimal environmental impacts. One of our concerns with recent IPP developments has been the absence of any strategic plan under which to evaluate proposed new electricity sources. The outcome of this inquiry may help to address this knowledge gap.
2. Given that information contained within the new BC Hydro LTAP is considered to be in scope, how will the inquiry deal with the fact that this LTAP is not expected to be approved by BCUC for several months?
3. When considering generation capacity, we feel it is important to distinguish between facilities that can provide base load and those which provide intermittent power. Thus, when considering a range or number of viable options, one of the criteria under consideration should be the ability to provide base load and/or meet peak demand periods.
4. We disagree with the statement that, with regard to discussion of areas inappropriate for development, only generation resources - and not transmission lines - should be considered in scope. Transmission lines are part and parcel of generating resources and should be considered along with all other associated infrastructure including power houses, penstocks, access roads, etc. Often, some of the major environmental impacts of projects are associated with the transmission line component. Therefore, it is important, when considering areas, e.g., parks, that should be off limits for electricity generation, that proposed transmission lines be a component under consideration. In our view, the omission of transmission lines from consideration would result in a flawed and incomplete analysis.
5. We also feel it is important to consider costs and cost allocation of new transmission facilities as an in scope item. In particular, it is important that consideration be given to the parties that will bear these costs so as to ensure an equitable distribution of such costs.

Sincerely

Elaine Golds, Conservation Chair