



June 11, 2009

Ms. Erica Hamilton  
Commission Secretary  
British Columbia Utilities Commission  
Sixth Floor, 900 Howe Street, Box 250  
Vancouver, BC V6Z 2N3

Dear Ms. Hamilton

**Re: British Columbia Utilities Commission  
Project No. 3698545 / Order G-30-09  
Inquiry into British Columbia's Long-Term Transmission Infrastructure**

In response to your letter of May 21, 2009, and Order G-47-09 inviting written submissions to the British Columbia Utilities Commission (the Commission) on the Staff Discussion Draft on Scope of the Inquiry (Discussion Paper), the Coast Forest Products Association provides the following response.

The discussion paper identifies and includes issues that staff considered within the scope of the inquiry. From a forest sector perspective the draft is somewhat unclear as to what may be considered within the scope of the inquiry. Key for the forest sector is the transmission of the power supply and the impact of transmission corridors on the land base and future access to timber. As transmission corridors do not "share" the forest land base, instead converting the land base to single use and reducing the harvestable timber area, we have the following comments and questions:

**Assessment of Generation, item (iii) areas inappropriate for development such as parks and protected areas:**

We are unclear as to the rationale the Commission will utilize to designate areas inappropriate for development such as parks and protected areas. While we recognize the interest in preserving parks and protected areas, there may be situations in which these sites may be the most feasible physical and economic choice. In such cases, our view is that such decisions should not be automatically excluded and out of scope of the commission's considerations.

**In-Scope:**

In response to bullet 2: "Generating, capability, type and geographic area," we believe that there should be a sub-bullet that requires the consideration of existing transmission infrastructure and how new ones would link in with least impact on harvestable forest land.

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### **Not in Scope (b):**

In response to bullet (b) “[the commission may not] *make determinations with respect to the specific routing or technological specifications of electricity transmission projects*” we accept that the Commission may not make determinations on specific projects, we cannot agree that it should not be making determinations with respect to the specific routing of electricity transmission projects.

### **Assessment of Demand (6):**

We are unclear as to what is implied by the reference to the Terms of Reference paragraph 6. (a) (i) in light of the position that the commission will not make determinations on specific routing as noted above.

(a) *Take a long term view of transmission development to support:*

- (i) *Additional transmission infrastructure and capacity that would accommodate reasonably foreseeable resource and economic development;*

A long term view of transmission development to support additional infrastructure and capacity that accommodates reasonably foreseeable resource and economic development would, in our view, require determinations on specific routing, or at minimum instructions on how such routing would be determined so as not to negatively impact resource and economic development.

### **Assessment of Transmission:**

Our comment in reference to Assessment of Demand above applies to this section as well.

### **Assessment of Transmission, In Scope:**

While we acknowledge that the bulk transmission system is an appropriate starting point for analysis of the transmission system, we underscore the point that it “*should not prevent the consideration of regionally significant transmission.*” We believe it must also consider existing infrastructure and how to best link in new transmission lines.

### **Assessment of Transmission, Not in Scope:**

From a coastal forest sector perspective the lower voltage transmission systems from the smaller run-of-river IPPS impact the harvestable forest land base and access to timber, such as through no fly zones for heli-logging. It is our view that the commission needs to consider how to best capture increased power generation within limited corridors.

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In summary, we believe that the routing of electricity transmission projects, and the impact of such routing on the forest sector and other natural resource industries, should be included as "in scope" for the purposes of the inquiry. If this is not practical, we would appreciate the enquiry otherwise establishing clear and consultative parameters that can be applied to routing determinations.

Thank you for the opportunity to comment.

Yours truly,



R.M. (Rick) Jeffery  
President and CEO  
Coast Forest Products Association

