



June 11, 2009

Erica M. Hamilton  
Commission Secretary  
British Columbia Utilities Commission  
Sixth Floor, 900 Howe Street  
Vancouver, B.C.  
V6Z 2N3

Dear Madam:

**Re: Inquiry into British Columbia's Long-Term Transmission Infrastructure  
Order G-30-09  
Staff Discussion Draft on Scope of the Inquiry ("Draft")**

Set out below are the IPPBC's comments on the Draft of Scope of the Inquiry. As there is going to be a follow-up workshop and pre-hearing conference on the Scope of the Inquiry, these views are very preliminary in nature and may change after more discussion and review. Unless otherwise stated the comments follow the headings contained in the Draft.

### **Generation**

1. Fundamental to the determination of sources of electricity supply ("Supply") is the proximity of the Supply to transmission/distribution wires. For example, if a source of supply is 100 kilometers away from the nearest interconnection point, the question is whether it should be included as a source of Supply for the purposes of the Inquiry. It would be helpful to have some indication of whether proximity to generation/distribution wires is a constraint in relation to the extent of the Supply. The IPPBC does not want proximity to necessarily be used as a constraint but would like to know in broad terms how this matter will be dealt with.
2. If possible, data from the BC Hydro's Long Term Acquisition Plan ("LTAP") or other sources should be cross checked against B.C. Government data bases such as Applications for Conditional Water Licences, wind land tenures, geothermal tenures, woodwaste supply etc.
3. The methodology used to produce the "Approximate cost" should be within scope. It will be a function in part of the terms and conditions of the buyer's electricity purchase agreement including among other things wind integration costs, freshet caps and firm and non-firm prices.



4. The methodology used to produce the “Capacity rating type” should be within scope.
5. Although the concept of developing technologies appears to be very broad, it should be made clear that technologies that can be used to store electricity such as batteries in electric/hybrid vehicles are within scope.
6. The methodology used to determine “regions” should be in scope.
7. The benefits of a diverse portfolio of renewable technologies should be in scope as well as any impacts of climate change, if any, on existing or new generation.

### **Assessment of Demand**

1. The impacts of greenhouse gas initiatives on the demand for electricity in potential export markets should be in scope.
2. Although set out in Section 6(b)(i) of the Section 5 Terms of Reference, it is not clear whether the interpretation of the: “additional 3,000 GWh of supply per year from electricity generating facilities within the Province as soon as practicable but no later than 2026” is within scope and whether this requirement has to be met before exports could commence.
3. To be consistent with the statement “The scenarios identified in the Terms of Reference consider heightened requirements arising from fuel switching to electricity as a greenhouse gas reduction strategy, and regional long-term economic expansion” the “High Demand” scenario should be based on high fuel switching and not just “plug-in electric vehicles”.
4. The statement under the heading “Not in Scope” is too broad. It appears to unintentionally negate Section 7(c) of the Section 5 Terms of Reference.

Yours truly,

“Original signed by David Austin”

David Austin

Cc Applicants and Interveners