

**B.C. FIRST NATIONS ENERGY & MINING COUNCIL**

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June 23, 2009

Commission Secretary  
BC Utilities Commission  
Box 250, 900 Howe St.  
Vancouver, B.C.  
V6Z 2N3

Attention: Commission Secretary: Ms. Erica Hamilton

Dear Ms. Hamilton:

**Re: BCFNemc Supplementary Response to Staff Discussion Paper on s. 5 Transmission Inquiry Scope**

Attached as an email attachment is a supplementary response on scope following the June 18, 2009 workshop.

Please be advised that members of our team shall be attending the June 24, 2009 Conference.

Yours truly,

*“Peter Dimitrov”*  
Barrister & Solicitor

Attached: “Supplementary Comments on  
Commission Staff Discussion Draft on Scope

## **BCUC INQUIRY INTO BC'S LONG TERM TRANSMISSION INFRASTRUCTURE BC FIRST NATIONS ENERGY & MINING COUNCIL INTERVENTION**

### **Supplementary Comments on Commission Staff Discussion Draft on Scope**

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#### **Overview:**

The BC First Nations Energy and Mining Council (BCFNemc) submitted comments on the Commission Staff Discussion Draft on Scope of the Inquiry on June 10, 2009. Following the workshop on scoping issues on June 18, 2009, the BCFNemc has additional comments on the draft scope for the inquiry. These comments are supplementary to the BCFNemc comments submitted on June 10, 2009. The BCFNemc intends to adopt both submissions at the pre-hearing conference scheduled for June 24, 2009. The BCFNemc will also provide comments on certain legal issues under separate cover.

#### **Scoping of Initial Scenarios**

The BCFNemc appreciates BC Hydro's proposal for an early engagement process in July and believes it will be of considerable assistance to the process. The BCFNemc recommends that the BCUC formalize the early engagement process as part of the overall inquiry schedule. The BCFNemc intends to participate in the early engagement process.

The BCFNemc believes it will be necessary very early in the proceeding to develop a common understanding and vocabulary with respect to the scenarios that will be analysed during the inquiry. For example, within a scenario there may be many different regions, indicators, attributes or other variables considered. To this end, it would assist the BCFNemc to have BC Hydro and/or BCTC provide a logic map or diagram showing how they envision each scenario would be developed, and the list of indicators, attributes or other variables that would be considered in each scenario, both as inputs to the scenarios and outputs from the analysis. The BCFNemc respectfully submits that it would assist intervenors and the Commission to have a draft outline of such a diagram circulated in advance of the early engagement sessions for comment and discussion. For example such a diagram could expand on the discussion at pages 1 and 2 of the BC Hydro comments on the Commission Staff discussion draft.

Finally, the BCFNemc submits that in addition to the objectives of the early engagement process described in BC Hydro's submission (at page 3), a further objective of the early engagement process should be to develop an initial definition of scenarios to be included with the September 18 filing.

#### **Exports or Inter-jurisdictional Trade**

The BCFNemc remains unclear with respect to how the issues related to exports (or inter-jurisdictional trade) are intended to be addressed during the inquiry. In particular, the priority that export opportunities will be given for future developments is not clear. If export markets are intended to be a driver for future generation and transmission development, rather than simply an opportunity that can be realized as a result of infrastructure developed for domestic use, it will have material implications for the planning

process. It may be possible that this distinction can be addressed by developing different scenarios (e.g. scenarios that represent different priorities for development of inter-jurisdictional trade opportunities). This seems consistent with the Commission staff's comments at the June 18<sup>th</sup> workshop with respect to export scenarios related only to self-sufficiency based infrastructure planning versus scenarios where additional exports justified on other objectives are considered. However, the BCFNemc recommends that the Commission provide additional guidance with respect to how exports or inter-jurisdictional trade opportunities are to be considered during the inquiry.

### **Integration of Generation and Transmission**

The BCFNemc reiterates its concern with respect to integration of generation and transmission considerations in the planning process. In particular the BCFNemc believes that the extent to which generation resource decisions implicitly influence transmission resource decisions and vice versa should be addressed during the inquiry.

### **Transmission**

The BCFNemc notes the comments in the staff discussion draft on scope that state initial focus on the bulk transmission system should not prevent consideration of regionally significant transmission, irrespective of voltage. The BCFNemc reiterates its earlier comments regarding First Nation concerns with respect to the lack of grid access and continued reliance on diesel generation.

### **Public Consultation and Engagement**

The BCFNemc found the presentation and discussion on meaningful public engagement at the June 18 workshop to be useful. The BCFNemc encourages the Commission to commit to meaningful public engagement.

### **Areas Inappropriate for Development**

The BCFNemc is concerned that the consideration of areas inappropriate for development not be too narrow. In the BCFNemc's view a standard limited to imminent government decisions is too restrictive. The suggestion during the workshop that there be a spectrum of areas inappropriate for development (described by some parties to the workshop as "red, yellow or green areas") seems to provide a useful approach to adopt for the inquiry.