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Utilities Commission

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October 7, 2019

Sent via eFile/email

CREATIVE ENERGY BEATTY/EXPO PLANTS CPCN AND REORGANIZATION	EXHIBIT A-35

Mr. Rob Gorter
Director, Regulatory Affairs and Customer Relations
Creative Energy Vancouver Platforms Inc.
Suite 1 - 720 Beatty Street
Vancouver, BC V6B 2M1
rob@creative.energy; info@creative.energy

Re: Creative Energy Vancouver Platforms Inc. – Application for Certificate of Public Convenience and Necessity for the Expo–Beatty Plants and Reorganization – Project Number 1598962 – Panel Information Request No. 1 on the Specified Scope

Dear Mr. Gorter:

The Panel has reviewed the evidence on record for the proceeding and has determined there is a need for additional information and further clarification on a number of issues. Accordingly, please find enclosed the Panel Information Request (IR) No. 1 on the Specific Scope to Creative Energy Vancouver Platforms Inc. (Creative Energy). Please file your responses by **Friday, October 11, 2019 at noon**.

The Panel also requests that if either Creative Energy or registered Interveners consider there to be a need for process to allow for additional arguments on the specific content of the responses to the Panel IRs, they inform the British Columbia Utilities Commission in writing by **Tuesday, October 15, 2019.**

Sincerely,

Original signed by:

Patrick Wruck
Commission Secretary

LJ/aci
Enclosure

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Creative Energy Vancouver Platforms Inc.
Application for a Certificate of Public Convenience and Necessity for the Expo and Beatty Plant Project and Approvals Related to Reorganization

PANEL INFORMATION REQUEST NO. 1 ON THE SPECIFIED SCOPE TO CREATIVE ENERGY VANCOUVER PLATFORMS INC.

1.0 Reference: CONTINGENCY PLAN
Exhibit B-28, BCUC IR 4.1
Boiler #6

In response to the British Columbia Utilities Commission's (BCUC) Information Request (IR) 4.1, Creative Energy Vancouver Platforms Inc. (Creative Energy) states:

> At a high level, the sequence and approximate duration of the major tasks is as follows:
>
> Shutdown #1
> Prior to July 1st
> - Decommission Plant
> - Re-build west plant wall
> - Abatement of Boilers and balance of plant
> - Relocate Boiler #5 & other equipment
>
> Following July 1st
> - Construct temporary flue for Boiler #5
> - Tie-in Boiler #5 and other equipment (mainly feedwater pumps)
> - Connect temporary power to Boiler #5 and other equipment
> - Hydrostatic testing and flushing of new steam and feedwater piping
>
> …
>
> This sequence puts the critical work in advance of July 1st, to the extent possible, and minimizes the dependency on delivery of unique or long-lead items in the latter half of the shutdowns…
>
> This approach minimizes the chance of the critical path being disrupted between July 1st and the restart of the Beatty Plant each year.
>
> …
>
> Moreover, it is important to understand that Boiler #6, which has a functional capacity of 170,000 PPH is largely untouched throughout the shutdowns. The risk of a failed restart of the Beatty Plant is almost entirely mitigated by (i) the in-service Expo Plant, and (ii) the general preservation of Boiler #6. Boiler #6 is the newest boiler in the plant, is in excellent working order, can be driven with a steampowered forced draft fan and a steam-powered feedwater pump (located underneath the boiler) and a freestanding flue adjacent the boiler and to the East.

It is entirely reasonable to assume that Boiler #6 can be fired following Beatty Shutdown #1, noting that the only Boiler #6 connections being touched during the shutdown are the feedwater connections and the electrical power, and any issue with either of those connections can be remedied in a very short timeframe. [Emphasis added]

1.1 Please explain in detail how Boiler #6 will be recommissioned in the event of a failed restart of the Beatty Plant and provide a description of the work to be completed in order to have the boiler operational. Please outline the timeline under which this will be completed.

1.2 If required by the BCUC, please confirm, or explain otherwise, that Boiler #6 will be recommissioned and fully operational prior to the planned Beatty Plant restart date of September 16th.

1.2.1 Please provide the earliest possible date on which Boiler #6 will be fully operational.

1.2.2 To ensure that Boiler #6 is fully operational prior to the planned restart of the Beatty Plant, please explain whether Creative Energy would need to reschedule any critical work that would impact the project schedule. If so, please provide details of the critical work rescheduled and the resulting risk to the project.

1.3 Please provide a detailed explanation of all work that is to be done to Boiler #6 during the shutdown.

1.4 Please provide a detailed explanation of the work to be completed in the area around Boiler #6 during the shutdowns and confirm whether the work will be completed by the date provided in response to IR 1.2.1.

1.4.1 If not confirmed, please explain the risks to Creative Energy's ability to operate Boiler #6.

1.5 In the event that Boiler #6 is required because of a failed restart of the Beatty Plant, please confirm that the boiler will remain in operation until a such time that it is no longer needed.

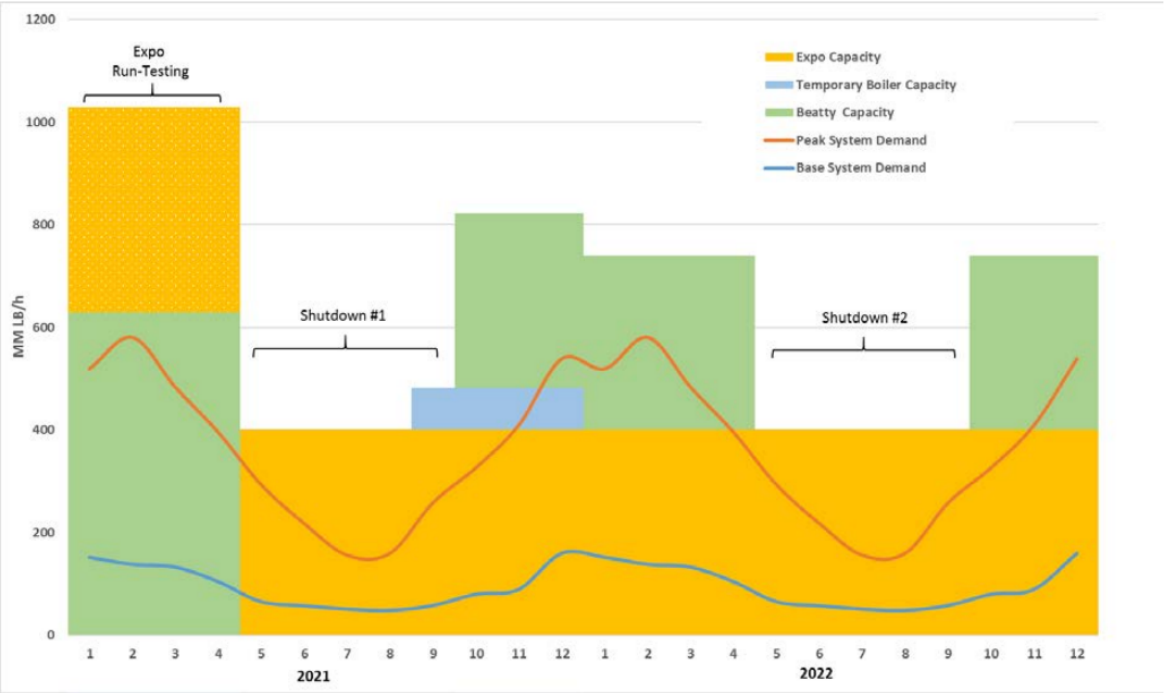
1.5.1 Please explain what impact this would have on the project.

1.5.2 Please explain whether Creative Energy can continue to safely advance with the work scheduled after the restart of the Beatty Plant with Boiler #6 in operation.

2.0 Reference: CONTINGENCY PLAN
Exhibit B-28, BCUC IR 5.1
Peak Loads

In response to BCUC IR 5.1, Creative Energy states:

> In the scenario where Creative Energy is not able to restart the entire Beatty Plant on the planned restart date of September 16th, Creative Energy would nevertheless have 400,000 PPH of capacity available at the Expo Plant plus 82,500 PPH of temporary boiler capacity at 701 Expo Boulevard, 170,000 PPH of functional capacity expected from Boiler #6, and the option to bring in more temporary boiler capacity that would be available to serve customers within 10 weeks of placing the order.
>
> The figure below depicts the capacity of the temporary boiler, presuming it is onsite for 4 months, commencing in September 2021. This scenario mitigates the incremental risk of a failed restart generated by the work being performed during Shutdown #1. [Emphasis added]
>
> …



2.1 Please update the figure above to separately illustrate the capacity of Boiler #6.

2.1.1 For the same period, please provide a table comparing the actual peak load in pounds per hour (pph), the available boiler capacity (pph) and the peak load met by the available boiler capacity (pph and percentage).