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British Columbia Utilities Commission
Sixth Floor, 900 Howe Street, Box 250
Vancouver, BC, V6Z 2N3
Attn: Patrick Wruck, Commission Secretary
By Email: commission.secretary@bcuc.com

Dear Sir:

Re: Re: BCUC Review of Thermal Energy Systems Regulatory Framework Guidelines ~
Project No. 1599043
B.C. Sustainable Energy Association Submission on draft Terms of Reference

These are the comments of the intervener B.C. Sustainable Energy Association on the draft Terms of Reference, per Order G-341-19.¹

BCSEA's view is that the proposed scope and content of the review is appropriate.

Within the proposed scope of the review, BCSEA suggests inclusion of Energy Sources at a descriptive level. The TES Guidelines were developed in the context of increasing implementation of Thermal Energy Systems as a mechanism to reduce GHG emissions in B.C. The Guidelines state that the energy sources for Thermal Energy Systems may include waste heat, renewable energy or non-renewable energy.² BCSEA believes it would be useful for the review to have information on the energy sources of the Thermal Energy Systems that have been the subject of the Guidelines.

All the above is respectfully submitted.

Yours truly,

William J. Andrews



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¹ Exhibit A-2.

² “A Thermal Energy System consists of equipment or facilities for the production, generation, storage, transmission, sale, delivery or provision of heat, hot water and/or cooling from one or more thermal energy sources and through a distribution system. Energy sources may include waste heat, renewable (solar, ground/water source or air source heat pumps, geothermal, biomass etc.) as well as non-renewable energy sources...” [underline added] TES Guidelines, Appendix A to Order G-27-15, p.5 of 35.