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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 clarification of comment on draft
Terms of Reference

I am writing in response to the Commission Panel's March 3, 2020 request for clarification¹ of BCSEA's February 14, 2020 comments² on the draft Terms of Reference. For reference, the request is as follows:

"The Panel requests the BCSEA provide clarification on its submission recommending the inclusion of information on the energy sources of thermal energy systems that have been the subject of the Thermal Energy Systems Regulatory Framework Guidelines. Specifically, the Panel requests clarification on whether:

- the BCSEA recommends information be provided on thermal energy systems that have been approved by the British Columbia Utilities Commission to date, or
- whether the BCSEA is requesting that the energy sources of thermal energy systems be included as an item in the draft Terms of Reference."³

To respond and provide clarification, BCSEA's recommendation is line with the first bulleted wording. BCSEA's submission is that the TES Guidelines Review would benefit from information regarding the types of Primary thermal energy source(s) and Peaking/Backup energy sources for Thermal Energy Systems under the Commission's jurisdiction. BCSEA expects that the Commission would be in the best position to assemble and provide this information, as the Commission will have received this information under the TES Stream A Registration form⁴ and in CPCN Applications for Stream B TESs.

By way of background, it appears that the only information on TES energy sources on the Commission's website is for Stream B TESs, within the page for the relevant CPCN proceeding.

¹ Exhibit A-5.

² Exhibit C-4-2.

³ Bullets added for readability.

⁴ Order G-27-15, Appendix A

BCSEA is not aware of information on the Commission's website regarding the types of energy sources for Stream A TESSs. The Commission's orders approving registration of a Stream A TESS are accessible on the Commission's Decisions page,⁵ however the orders do not indicate the energy source. The Commission's 2017/2018 Annual Report⁶ does list Thermal Energy Sales for 2017 by Revenue and GJ, for specific Thermal Energy Systems and Total All Thermal Energy Utilities. The Annual Report also lists Thermal Energy System Regulated Entities (companies) and their respective TESSs, on page 79.

In summary, BCSEA suggest that the Review would be enhanced by information on the types of energy sources of the Thermal Energy Systems regulated by the Commission. This would provide useful context for the Review, given the importance of GHG emissions reductions in the rationale for many Thermal Energy Systems. The suggestion is that the information would be drawn from filings in the Commission's possession, rather than from external sources.

Yours truly,

William J. Andrews



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⁵ <https://www.ordersdecisions.bcuc.com/bcuc/en/hav.do>. Search for “thermal energy system”.

⁶ <https://www.bcuc.com/Documents/AnnualReports/2019//BCUC%E2%80%93Annual-Report%E2%80%93final%E2%80%9320181015.pdf>, p.74