

**From:** [Don Flintoff](#)  
**To:** [Commission, Secretary](#)  
**Subject:** British Columbia Utilities Commission – Review of Thermal Energy Systems Regulatory Framework Guidelines – Project No. 1599043 – Submission on the draft Terms of Reference, Exhibit A-6  
**Date:** Thursday, March 5, 2020 6:09:12 PM

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Dear Commission Secretary,

In response to Exhibit A-6, the Panel requested clarification with respect to my submission recommending the inclusion of information on the greenhouse gas emission of thermal energy systems. Specifically, the Panel requests clarification on whether the submission recommends information be provided on the greenhouse gas emissions of thermal energy systems that have been approved by the British Columbia Utilities Commission to date.

I believe it would be useful for the review to have comparative information on the various energy sources of the Thermal Energy Systems and their current GHG emissions per KWh produced by energy source so that their emissions can be easily compared to that of natural gas and electric energy in BC which is also both considered clean in BC.

The question is not one of whether the thermal energy systems have been approved but rather how this benefits the ratepayers of existing regulated public utilities (i.e. BC Hydro, FortisBC, etc.).

Further, as BC Hydro's energy production is considered clean energy and it publishes their GHG/kWh, I am seeking a technical comparison based on greenhouse gas emissions by the various energy suppliers to gain further insight to the GHGs/kWh generated by each energy source.

Also, are the existing ratepayers of existing regulated public utilities (i.e. BC Hydro, FortisBC, etc.) negatively impacted by these thermal energy systems which operate in parallel with other existing clean energy services already provided by those existing regulated public utilities? In other words do the existing regulated utilities and their ratepayers incur stranded assets (under-utilized assets through a reduction in the number of customers available) and additional costs through having to pay municipal taxes on their rights-of-way if the service are not utilized to their full extent?

Regards,

Donald Flintoff

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