

March 13, 2020

British Columbia Utilities Commission
Commission Secretary
Suite 410, 900 Howe Street
Vancouver, BC Canada V6Z 2N3

Re: British Columbia Utilities Commission – Review of Thermal Energy Systems Regulatory Framework
Guidelines – Project No. 1599043 – Terms of Reference

Dear Patrick Wruck,

In Exhibit A-6, the Panel sought clarification with respect to my submission recommending the inclusion of information on the greenhouse gas emission of thermal energy systems. My clarification is outlined in Exhibit D-11-2 that requests data in the units of GHGs/KWh produced by energy sources 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.

In Exhibit A-7, I was advised that: “However, the BCUC does not require the reporting of GHG emissions for Stream A TES, and thus does not have this information and cannot provide it. Stream B TES typically provide information on GHG emissions as part of Certificate of Public Convenience and Necessity applications, and this information is posted on the BCUC’s website.”

There is no listing that I could find for Stream B TES CPCN Applications on the BCUC website.

However, I did manage to find a Stream B CPCN Application related to SFU.

In that CPCN, it states:

“At full buildout, the UniverCity NUS will save approximately 10,110 MWh of electricity annually, compared to the benchmark (electric baseboards for heating).”

“Although it is not part of this application, once the permanent plant is built, the expected GHG emission reduction will be over 2,700 tonnes of CO2 annually. (p. 38)”

Although the CPCN specifies the GHG emission reduction, it does not appear to state the GHG/KWh produced by the wood based biomass facility. Further, as the benchmark for energy savings is electric baseboards and assuming electricity in BC is 93% clean, how can we assume that these lower cost TES solutions although cost effective are cleaner than electric energy and should this be considered in the review process as part of the public interest?

My status as an interested party impairs my ability to proceed any further but the question of GHG emissions versus costs needs to be examined.

Regards,
Don Flintoff
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