



June 3rd, 2021

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

Subject: British Columbia Utilities Commission (“BCUC”) – Inquiry into the Regulation of Safety
Reply Submission on Proposed Stage 1 Sub Issues

Dear Mr. Wruck,

In compliance with Appendix A to Order G-34-21, Borealis GeoPower Inc. provides to the panel its Intervener Reply Submission on the Proposed Stage 1 Sub Issues.

Please find Borealis GeoPower Inc.’s brief comments attached.

Warm Regards,

Michael Bisnaire
Lead – Corporate Affairs
Borealis GeoPower Inc.

Borealis GeoPower Inc. – Intervener Reply Submission on Proposed Stage 1 Sub Issues

Borealis GeoPower Inc. thanks the Interveners for their thoughtful comments about the Proposed Stage 1 Sub Issues and looks forward to the finalization of the Stage 1 Sub Issues and the subsequent submissions on those issues.

Upon review of the submissions by the other interveners to this Inquiry, Borealis writes in reply to the intervener submissions.

Various interveners commented on the potential benefits of addressing select Proposed Sub Issues in Stage 2 rather than Stage 1. Borealis agrees with addressing these issues at a later stage, should the effectiveness of the inquiry benefit from doing so.

On page 3 of Appendix A to BC Hydro's April 29, 2021 Submission on the Proposed Stage 1 Sub Issues, BC Hydro submitted the following with respect to the sub issue of whether the safety of the environment be more explicitly considered:

BC Hydro is unsure what "safety of the environment" encompasses, but, regardless, the BCUC has no jurisdiction to regulate or set standards for the environment, because the UCA does not provide the BCUC such jurisdiction. Accordingly, BC Hydro respectfully submits that this question be removed.

In reply, Borealis respectfully submits that this question should not be removed and that it should be given the opportunity to be fully addressed by the Inquiry participants during the Intervener Evidence and/or Argument components of Stage 1 of the Inquiry. While BC Hydro may submit that the BCUC has no jurisdiction to regulate or set standards for the safety of the environment, other interveners may disagree.

With respect to Borealis's proposal to add a question under Sub Issue 6 regarding the BCUC's mandate to ensure that the regulation of safety by other regulatory bodies imposes the least possible economic burden on the public utility, while still ensuring safety, BC Hydro submitted the following on June 3, 2021:

BC Hydro respectfully submits that the BCUC does not have jurisdiction to assess the efficiency of another regulatory body's regulation of safety, nor does it have jurisdiction to ensure that another regulatory body's regulation of safety is as efficient as possible. Accordingly, in BC Hydro's view, BGP's proposed question should not be added to the Final Stage 1 Sub Issues.

In reply, Borealis respectfully submits that this question with regards to regulatory overlaps be given the opportunity to be fully addressed by the Inquiry participants during the Intervener Evidence and/or Argument components of Stage 1 or Stage 2 of the Inquiry, whichever is best.

