

August 30, 2017

BCUC INQUIRY RESPECTING SITE C

F 41-2

VIA ELECTRONIC MAIL

Commission Secretary
B.C. Utilities Commission
Sixth Floor, 900 Howe Street
Vancouver, BC Canada V6Z 2N3

Attention: Mr. Patrick Wruck

Dear Mr. Wruck:

RE: BCUC Inquiry Respecting Site C

Please accept this letter as a submission to the *BC Utilities Enquiry Respecting Site C* from the District of Hudson's Hope. We thank the Commission for the opportunity to make this submission to an impartial regulatory body, albeit late in the project development, on a very short timeline and under very narrow terms of reference.

Hudson's Hope is the municipality most affected by Site C. There are impacts during construction, mainly as a result of shoreline protection, but the most significant impacts are the permanent ones resulting from the 100+ year operation of the project. The District loses infrastructure and sections of a well-used community park. Just under 20% of the reservoir resulting from Site C would be located within municipal boundaries.

BC Hydro is by far the largest landowner within the District of Hudson's Hope, largely because of Site C. The District would lose over 4600 acres (1700 hectares) to inundation, highway relocation or the statutory right-of-way (SRoW) placed on land adjacent to the reservoir which is at risk to sloughing or erosion. No permanent structures would be allowed on the SRoW, thus it effectively removes choice waterfront property from present or future development. In addition to the above, four years ago, Hydro's Site C project acquired nine quarter sections (over 1400 acres or 565 hectares), which is distant from the reservoir.

We trust that the above qualifies the District as an "interested party." (Terms of Reference [ToR] 3(d)).

ToR 3 (a)

We support the information requests submitted by David Austin, (*The Clean Energy Association of BC (CEBC)*) and Devlin Gailus Watson (*Prophet River and West Moberly First Nations*). In order to accurately assess the implications of the three options, one has to have access to the

detailed budget and modeling that went into arriving at the \$8.335 billion figure. Rate-payers and taxpayers would be obliged to pay for the project, but they have not been provided with information that allows them to know what they are receiving for their massive expenditure and debt-load. Have all the costs been accounted for? There is no way of knowing without seeing the total breakdown. Those who are obliged to pay for this project have a right to know what the detailed costs are estimated to be, and how those costs were arrived at.

One example of costs which we do not believe were included is Crown land. Site C would alienate a considerable amount of it, some within the District of Hudson's Hope. To the best of our knowledge, the Crown land would be a free transfer to BC Hydro from the province.

The District recently had need of some Crown land as well but the people of Hudson's Hope were not fortunate enough to receive a free transfer. For 18.9 hectares, the District was required to pay \$188,900 plus timber values of \$4,809.78, a cost of \$10,249.19 per hectare. (see attachment #1).

Clearly Crown land has value and the province has a well-established method of assessing that value. The Crown land that is alienated is part of the true cost of Site C and BC Hydro should pay for it the same as local governments and other entities are required to.

ToR 3(b)4

Integrated distributed generation offers proven, commercially feasible electricity supply, as BC Hydro's grid-tie program demonstrates. For over 50 years, the BC Hydro system has provided firm power for the province. The emergence of non-firm renewables such as solar and wind creates opportunity for an additional role for the Hydro system: backing up the renewables.

By the end of the year Hudson's Hope will have installed what will be the largest municipal solar project in British Columbia, with total peak output of approximately 500 kw. The footprint of roof and wall-mounted panels is very small and the reduction in demand on the Hydro system is significant. It is a good program with enormous potential for expansion throughout the province, as the back-log in the Hydro grid-tie office illustrates.

We note that on August 18 of this year, Hydro announced that they were no longer accepting applications for the Standing Offer program over 100 kw although the under 100 kw continues. If there is need for new generation, grid-tie is a non-invasive source that takes advantage of the existing system.

Thank you for the opportunity to make this submission.

Yours truly,





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