August 30, 2017

Via email: SiteCSubmission@bcuc.com

Commission Secretary
British Columbia Utilities Commission
Sixth Floor, 900 Howe Street
Vancouver, BC V6Z 2N3

Attention: Patrick Wruck

Dear Mr. Wruck:

Re: Site C Inquiry – Submissions of Prophet River First Nation and West Moberly First Nations

We are counsel for Prophet River and West Moberly First Nations (the “Treaty 8 Nations”). As you are aware, the Treaty 8 Nations have been extensively involved in the review of the Site C Project since 2011. The Nations have produced several reports that speak directly to the issues that the Commission is tasked with considering. We have included copies of these reports and submissions for your reference. We understand that once we have access to the submissions of BC Hydro and the Commission’s Preliminary Report that the Treaty 8 Nations will have the opportunity to make further submissions.

The purpose of this letter is to provide a summary of the Treaty 8 Nations’ position with regards to the questions facing the Commission.

1. Cost

For several years, BC Hydro stated that the budget for Site C was $7.9 billion and they were confident in that number. They provided only a summary of construction costs.
There was no independent review of the costs of the Project. KPMG produced a four-page letter reviewing BC Hydro's methodology, nothing more.\(^1\)

The Joint Review Panel (the "JRP") could not determine the accuracy of the costs, need for the Project and rejected the purported regional benefits of the Project. While the JRP stated that "Site C will seem cheap one day", this was not a finding of the panel. A $9 billion project may seem cheap if it is amortized over 80 years (which is the current plan – project will be paid off in 2094). BC Hydro's position is that if Site C lasts 100 years, at some point in the future it will pay for itself. Thus the statement must not be taken as a conclusion of the Panel, but a statement that if amortized long enough, Site C may someday seem cheap. While the statement seems superficially attractive, to paraphrase the line from the movie Field of Dreams – "if you build it they will come", it has not been borne out. Unfortunately, demand is not materializing and the Liberal government has been offering inducements and subsidies to industry to drive demand.

The $7.9 billion budget was the number they put forward to the JRP. The JRP concluded that it could not conclude on the likely accuracy of the Project costs and recommended a referral to the BCUC (Recommendation 46). In addition, the Project that was reviewed by the JRP was to have a 70/30 debt to equity ratio. Several participants, both during and after the hearings questioned the veracity of BC Hydro's cost estimates. They were right.

Two months after issuing the Environmental Assessment Certificate, the Province made a Final Investment Decision (the "FID") to proceed with Site C, but the cost had ballooned to the tune of $900 billion, without a shovel being put in the ground and BC Hydro would be providing no equity – the Project would be financed with 100% government debt. As a result of these two significant changes, any comments by the JRP about Site C being the "least expensive" option no longer are true.

Without a requirement to provide any financial return – because there is no equity with which to provide a return – the unit energy cost can be decreased, but this is the equivalent of a mirage.

The JRP concluded that such distortion should not occur for Site C:

Yet a principal reason private power producers face higher costs of capital is that they bear most performance risks. In BC Hydro's case, those risks are no less real but are borne by the customer or taxpayer, not BC Hydro. This is no reason to artificially reduce BC Hydro's [Weighted Average Cost of Capital], especially if it is to be used as a surrogate for the [Social Discount Rate].

\(^1\) KPMG Commentary Letter.
Further, BC Hydro defined its WACC as based on a supposed average of 80 percent debt and 20 percent equity. The former is cheap—it is, after all, guaranteed by a triple-A entity with taxing powers—and the latter is shadow-priced by the return on equity BCUC allows to Fortis, a private competitor. But BC Hydro’s equity is largely fictional. It is only “deemed” to have equity; in fact it has deferral accounts. Between the EIS and the IRP, the definition went from 80:20 to 70:30 — and the WACC declined. Such an accounting marvel should not be allowed to drive choices that would affect the B.C. economy and landscape for many decades.²

In BCUC hearings a representative of BC Hydro confirmed that the Province expects zero return on investment on Site C for 70 years. Dr. Harry Swain, Chair of the JRP, has opined that BC might be able to recover $2 billion of the $9 billion projected cost over the life of the Project.

2. Need

In spite of a currently large energy surplus, BC Hydro took the position that there was an urgent need for Site C to be operational by 2024. The JRP rejected these claims finding that some power from Site C may be needed by 2028.

While it is possible that there may be a need for some power in 2028, there will be a loss of at least $800 million over four years (likely at least seven years) as such power will have to be exported. It is likely much greater losses given demand has been flat for 10 years and will be so for the foreseeable future. Given that a liquefied natural gas sector has not materialized, it is more likely that the No LNG scenario — no power until 2033 at the earliest, the end of the JRP review period — is the most likely scenario.

Importantly, the JRP identified significant restrictions regarding what they could consider “existing resources” in this calculation. Two of note, the Canadian Entitlement, which is approximately 1,300 MW, under the Columbia River Treaty and the Burrard Thermal Plant, at 900 MW are equivalent to two Site Cs. Neither resource is considered under the Clean Energy Act as a resource that BC Hydro can draw upon for domestic purposes. The Treaty 8 Nations wrote to Ministers Bennett and deJong prior to the FID setting out a portfolio, including the Canadian Entitlement that is at least $2 billion cheaper than Site C ($3 billion with the $9 budget).³ We enclose a copy of that letter for your reference.

The JRP rejected BC Hydro's need calculations and recommended they construct a reasonable long-term pricing scenario and that this be reviewed by the BCUC prior to construction (Recommendation 47). That of course, did not happen.

Site C will produce power at a minimum of $100 MW, notwithstanding the amazing accounting marvel they have performed, raising the cost of the Project by almost $1 billion, while bringing down the cost per MW. Site C power will have to be exported for many years, certainly more than the four years initially put forward by BC Hydro. The current export market pays approximately $23 MW and is not likely to rise anytime soon given the current energy glut in North America. The result is the taxpayers of British Columbia subsidizing cheap power for the citizens of Alberta and California.

The JRP concluded that BC Hydro had not fully demonstrated the need for the Project on the 20-year timetable that they conducted their review.

3. Demand Moderation

Demand for power has been relatively flat the last ten years and does not appear to be increasing in the foreseeable future. However, BC Hydro has consistently overstated demand. The JRP correctly noted that Liquified Natural Gas, if developed will use natural gas to provide the power necessary for liquefaction, not hydro-electric.

Demand-side management ("DSM") is to account for at least 66% of load growth through 2020, then falls to 55% in 2033. The JRP concluded that the potential savings from DSM are likely understated. Importantly, the JRP concludes that net demand in 2033 is likely to be 65 terawatt hours, which is 4.2 TWh less than the 69.2 TWh proposed by BC Hydro. This difference represents 80% of the energy capacity of Site C.

As a result, the JRP recommended referring the load forecast and DSM to the BCUC. Again, this did not occur. However, since that time, the 2012 load forecast, on which the 2013 Integrated Resource Plan was based, has collapsed. Even BC Hydro now admits that needs for capacity and energy have shifted several years into the future. As a result, the 2016 load forecast is significantly lower than the 2012 load forecast which was the subject of the JRP review. Thus, the concerns raised by the JRP and the Treaty 8 Nations around costs, need and demand moderation are amplified by the 2016 load forecast.

Recently, as demand is not materializing, BC Hydro has all but abandoned DSM for load growth to try and make a case for Site C. As the JRP pointed out as any economist will

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4 Without considering the existing resources of Burrard Thermal and Columbia River Entitlement there would be at least 7 years of surplus.
5 Program on Water Governance, Reassessing the Need for Site C ("UBC Study") at p. 29-30.
6 UBC Study at p. 32.
7 UBC Study at p. 79-82.
opine, as rates rise, ratepayers behavior will change and they will use less power and seek out consumer products that are more energy efficient. BC Hydro’s approach was based on the assumption that DSM becomes zero by 2034. BC Hydro’s position on DSM is ridiculous and was thoroughly discredited by the Treaty 8 Nations in their letter to Ministers Bennett and DeJong, just prior to the FID.8

4. Alternatives

The Commission’s terms of reference provide you to provide a response to the following question:

Given the energy objectives set out in the Clean Energy Act, what, if any other portfolio of commercially feasible generating projects and demand-side management initiatives could provide similar benefits (including firming; shaping; storage; grid reliability; and maintenance or reduction of 2016/17 greenhouse gas emission levels) to ratepayers at similar or lower energy costs as the Site C Project?

We have addressed the demand-side management issue above. Throughout the JRP phase and leading up to the FID, the Treaty 8 Nations provided myriad alternatives that were cheaper and met the “objectives of the Clean Energy Act” in particular, the requirement that 93% of electricity be generated in BC from renewable resources. We have provided you with copies of these reports for your reference.

The Joint Review Panel was supportive of the objectives of the Clean Energy Act, but also the hypocrisy of the government in amending, clarifying or modifying such objectives when it suited their purposes, including providing an exception from the GHG targets for a liquefied natural gas industry that has yet to materialize.9 The Commission should also not feel so constrained by these objectives.

The 93% requirement is curious, and in the Treaty 8 Nations’ submission was geared to render Site C a fait accompli. By disallowing the operation of Burrard Thermal and use of the Columbia River Treaty Entitlement, as it is not generated in BC, the government stacked the deck to make Site C the most attractive option. They also misled the public, the First Nations and the JRP on the estimated cost of the Project.10

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8 Letter from Treaty 8 Tribal Association to Ministers Bennett & DeJong, dated December 10, 2014 at p. 4-7.
10 Importantly, the initial Site C Budget of $7.9 billion contained a contingency of $730 million so it is unclear why a further $400 million project reserve is necessary as well.
In spite of this, the Treaty 8 Nations put forward a number of supply alternatives that were not only competitive with the initial Site C budget, but cheaper, without the significant adverse impacts on the environment or the First Nations' Treaty rights.¹¹ The JRP concluded that a number of supply alternatives are competitive, although in the long-term Site C would produce less expensive power. Importantly, these comments were made in the context of a $7.9 billion project with 70/30 debt/equity ratio, not the Project approved in the FID. The JRP asked BC Hydro to conduct a sensitivity analysis, which found that a 10 percent increase in the cost of the Project would, even based on BC Hydro's own skewed analysis tip the scales in favour of alternatives, which would be cheaper by a sum of $120 - $230 million.¹²

A subsequent review, performed by respected economist Robert McCullough, found that Site C may well be as much as twice as expensive as an alternative portfolio.¹³ We enclose a copy of that study for your reference.

One alternative that was not investigated by BC Hydro during the JRP phase was geothermal. The JRP chastised BC Hydro for not conducting any research into the geothermal potential notwithstanding BC Hydro's own estimates that the resource may offer up to 700 MW of firm, economic power with low environmental costs.¹⁴ Subsequently, the Canadian Geothermal Energy Association produced a report, finding, inter alia, that the potential for geothermal is greater than 700 MW, the resource has a lower unit energy cost and capital cost, produces more permanent jobs, avoids costly transmission upgrades and plants can be built on demand.¹⁵

Finally, the JRP questioned BC Hydro's methodology as the cost of alternatives remained constant, not accounting for technological changes which drive down the price of alternatives such as wind and solar. This issue is addressed in more detail in the UBC study, which finds an alternative portfolio to be $1.25 billion cheaper than Site C today, given that the cost of wind energy, in particular, has plummeted since 2014.¹⁶

5. Greenhouse Gas Emissions

While it was not a focus of the JRP hearings, BC Hydro and the BC Government attempted to justify the approval of the Project based on a comment from the JRP that

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¹¹ Raphals, P. Need for, Purpose of and Alternatives to the Site C Hydroelectric Project, Abridged Version, April 2014, at p. 38-41.
¹⁶ UBC Report at p. 93-94.
[Site C] “would produce a vastly smaller burden of greenhouse gases than any alternative save nuclear power.”17

However, subsequent analysis from the Program for Water Governance comes to a different conclusion. That report finds that:

The Site C dam does not deliver energy and capacity at significantly lower greenhouse gas emissions than a fully optimized Alternative Portfolio put forward by BC Hydro (which includes wind energy). The difference in lifecycle GHG emissions, if a difference exists at all, is at most 1% of BC’s current emissions.18

The study found that Site C would produce annual emissions of 500 to 1000kt/year of CO2 during the period of 2024-2030, which is a critical period for emissions reductions if Canada is to meet its commitments to reduce GHG emissions, whereas the alternative portfolio that was examined avoids this spike.19

On a macro level, emissions in the province are currently projected to increase 39 per cent above 2014 levels by 2030, according to the Pembina Institute.20 The province will not meet its 2020 target to reduce emissions by 33 per cent below 2007 levels. The GHG issue is a red herring. Whether Site C is built, an alternative portfolio chosen, or the province chooses to rely on existing resources (eg. Canadian Entitlement), the impact on the province’s ability to meet its GHG targets is negligible. In contrast, had the Pacific Northwest LNG export facility gone ahead, its annual emissions would be more than 120 times the potential GHG emissions benefits of Site C, and would represent over 95% of British Columbia’s 2050 emissions reduction target set out in the Clean Energy Act.21

6. Costs of Cancellation of Contracts

Unfortunately, we have not been able to review the numerous construction contracts that BC Hydro has executed for the Project as they have not been made available to us. However, the major contract for Main Civil Works provides unfettered discretion for BC Hydro to cancel and limited recourse for contractors to seek compensation, beyond work that has been completed and decommissioning costs and a 15% markup.22 We expect that similar contractual language is in the other contracts that BC Hydro has entered into and once we are provided with access we may provide further submissions for the Commission to consider.

19 GHG Study at p.8-10.
21 GHG Study at p. 23.
22 Sections 17.1 and 17.2 of the Main Civil Works Contract.
Importantly, Contractors cannot make claims for “consequential damages” such as loss of profit or anticipated revenue. Thus, while the value of the contracts “awarded” may well be $4 billion, the actual value, if the Project is cancelled or suspended, will be based on actual work done, plus decommissioning costs.

7. The Public Interest – Justification for the Project

In 1983, the BCUC concluded that the Project could not be justified and that “an Energy Project Certificate for Site C should not be issued until (1) an acceptable forecast demonstrates that construction must begin immediately in order to avoid supply deficiencies and (2) a comparison of alternative feasible system plans demonstrates, from a social benefit-cost point of view, that Site C is the best project to meet the anticipated supply deficiency.” Very little has changed in the 24 years since the BCUC issued its report.

As part of its terms of reference, the JRP was asked to opine whether the Project could be justified under the Canadian Environmental Assessment Act (“CEAA”). While a different statute, the test remains essentially the same and asks whether the significant adverse environmental effects can be justified if there is a public benefit.

In the Peace Valley Landowners decision, which challenged the federal Order in Council authorizing the Project under CEAA, Justice Manson held that:

The Joint Review Panel determined that the significant adverse effects of the Project are not justified. The Panel determined:

- a) Justification must rest on an unambiguous need for the power, but that need had not been established;
- b) Justification must also rest on analysis showing that financial costs are sufficiently attractive to make tolerable the substantial environmental, social and other costs, but that the financial costs of the Project had not been sufficiently established.

The implication is clear - not having found an “unambiguous need for the power”, the Project could not be justified. The purported benefits of the Project are illusory and the impact on the public purse and ratepayers if the Project is completed will be significant. Given the infringement of First Nations’ Treaty rights, the significant adverse effects on the environment and the financial burden on the current and future ratepayers of this project, the Project is not in the public interest.

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24 Peace Valley Landowner Association v. Canada (Attorney General), 2015 FC 1027 at para. 34.
The issue of the cost of cancelling or delaying the Project is an important one, but must be balanced against the obvious benefits of cancellation, particularly the avoidance of a massive surplus created by the Dam that will have to be sold at a significant discount. The power is not needed now or anytime in the foreseeable future, either domestically or for export. The cost of completing the Project is uncertain. The "point of no return" is not when the Province has spent $2 billion or $3 billion, but when a decision is made to sink a further $8 - $10 billion knowing that the government never will be able to recover it from ratepayers or export it.

We trust that you find these submissions of assistance. Should you have any questions, please feel welcome to contact the writer.

Yours truly,
DEVLIN GAILUS WATSON

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JWG/irl
Encls.

cc. Clients
<table>
<thead>
<tr>
<th>Tab</th>
<th>Document Description</th>
<th>Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.</td>
<td>KPMG Commentary Letter</td>
<td>May 9, 2011</td>
</tr>
<tr>
<td>3.</td>
<td>Letter from Treaty 8 Tribal Association to Ministers Bennett &amp; DeJong Regarding Need and Alternatives</td>
<td>December 10, 2014</td>
</tr>
<tr>
<td>4.</td>
<td>Program on Water Governance – Reassessing the Need for Site C</td>
<td>April 2017</td>
</tr>
<tr>
<td>5.</td>
<td>Raphals, P. Need for, Purpose of and Alternatives to the Site C Hydroelectric Project, Abridged Version</td>
<td>April 2014</td>
</tr>
<tr>
<td>11.</td>
<td>Main Civil Works Contract, Schedule 2 – General Conditions, sections 17.1 and 17.2</td>
<td>December 21, 2015</td>
</tr>
<tr>
<td>12.</td>
<td>BCUC Recommendations for Site C Project - Excerpts</td>
<td>May 3, 1983</td>
</tr>
</tbody>
</table>
May 9, 2011

Dear Ms. Yurkovich and Mr. Assimes:

Re: Site C Clean Energy Project (the “Project”) - Commentary Letter

The BC Hydro Integrated Team (“Project Team”) has completed an updated project cost estimate and corresponding financial model (“Financial Model”). Acting in our role as financial advisor to BC Hydro, KPMG LLP (“KPMG”) has been asked to review the Financial Model prepared by the Project Team. Specifically, BC Hydro requested our comments on the logical and arithmetic integrity of the Financial Model, as well as the reasonableness and appropriateness of the approach, methods and processes used in developing the assumptions (“Assumptions”) transcribed in the Financial Model.

In this context, it is our understanding that the objective of the Financial Model (the “Financial Model Objectives”) is to function as a tool to:

1. consolidate key input data with respect to capital costs;
2. calculate interest during construction;
3. assess the financial implications of constructing the Project; and
4. calculate the levelled unit energy cost for the Project.

Our comments are organized as follows:

A. Scope of Review;
B. Methodology
C. Findings; and
D. Restrictions.

This is Exhibit B, referred to in the affidavit of Michael Savvidani made before me on this 13th day of February, 2015.
A. Scope of Review

The scope of our commentary is based on reviewing only the project documentation made available to us by the Project Team and interviewing members of the Project Team, BC Hydro, Partnerships BC and Pacific Liaison. Our review focused on the following:

1. the approach, methods and processes followed by the Project Team in developing the Assumptions contained in the financial model;
2. the transcription of Assumptions into the Financial Model; and
3. the construction of the base case Financial Model, insofar as its logical and arithmetic integrity is concerned, as an analytical tool that BC Hydro may use to achieve the Financial Model Objectives.

Our work did not include any of the following:

- assessing or verifying the commercial risks associated with the Project, nor commenting on the possibility of the financial projections contained in the Financial Model of being achieved;
- reviewing consistency of the Financial Model with externally linked files or verification of the contents and calculations of externally linked files in any way;
- considering any formula containing implicit assumptions, external references;
- reviewing the accuracy or appropriateness of visual elements (such as graphs) included within the Financial Model;
- assessing the completeness of the Assumptions or inputs used in the Financial Model;
- reviewing or testing of any sensitivity analysis of the Financial Model, including assessing the impact in the Financial Model of differing assumptions from base case; or
- providing any opinion or assurance regarding the functionality, accuracy or correctness of Microsoft Excel, the software program in which the Model was developed and operates, not the operating system that any users uses to run the Financial Model in Microsoft Excel.

The procedures we used to perform the work set out above do not constitute an audit or review made in accordance with any generally accepted auditing standards or company law or assessment of the technical feasibility or technical engineering review or compliance with applicable legislation.
B. Methodology

Our work is based on the following methodology:

- **Document Review** – reviewing project documents made available to us by the Project Team;
- **Interviews with Project Team Members** – conducting six interview sessions with Project Team Members. The interviews were used to develop an understanding of the process followed in creating the Assumptions contained in the Financial Model;
- **Review the process employed to develop the Financial Model assumptions**;
- **Review the transcription of inputs into the Financial Model** – we compared the Assumptions contained in the project documentation that was made available to us to those inputs used in the Financial Model; and
- **Verification of logical and arithmetic integrity of the Financial Model** – we reviewed the formula contained in the Financial Model for logical and arithmetic integrity.

KPMG employed BTY Group (a cost management and project management consultancy with extensive local experience) to aid in document review and Assumptions process review.

C. Findings

Our comments regarding each item in the scope of our work is addressed as follows:

1. **The approach, methods and processes followed by the Project Team in developing the Assumptions**

   The Financial Model was populated from Assumptions developed by the Project Team for direct, indirect and other costs, contingencies, and reserves.

   Various teams were involved in the development of these Assumptions. The teams were comprised of BC Hydro employees and external consultants selected by the Project Team based on their experience and qualifications.

   The direct cost estimate was developed by the Site C Integrated Engineering Team. Upon its completion, a peer review was undertaken by BC Hydro’s Generation Engineering Cost Estimating Team to verify pricing of the direct construction costs and compliance with BC Hydro’s estimating practices. The peer review also served to examine the cost estimate for major scope omissions.

   Other Assumptions were developed with assistance from subject-matter experts on the Integrated Project Team, BC Hydro Treasury Group, and Partnerships BC.

   For additional oversight, we understand that the process followed by the Site C Project Team also included consultation with its Technical Advisory Board and Executive Project Board.
We have reviewed the Assumption development process and it shows a level of care and diligence consistent with an infrastructure project at this stage of development. Based on our review, it is our view that the Project Team has followed reasonable and appropriate processes for developing the Assumptions used in the Financial Model.

In addition, we found that the Unit Energy Cost calculations are consistent with methodologies described in the project documentation made available to us. It is our understanding that this methodology is approved by the British Columbia Utilities Commission for the evaluation of energy generation options.

2. Transcription of the Assumptions contained in the project documentation into the Financial Model

In respect of this review, our major findings are as follows:

- **Application of inflation rates** – The project documentation made available to us refers to the CPI index of 2.1% for use in the Financial Model. However, we noted in the Financial Model that two inflation rates (2.0% and 2.1%) were used throughout.

- **Reference to Source Documents** – There were some examples where inputs have been hardcoded into the financial model or embedded within formulas of the Financial Model. In some instances no source document was provided to support these hard-coded numbers. One such example is the Forecast Return on Equity contained on the RAW-FN Reserve worksheet.

- **Transposition Error** – There was one instance of a transposition error on cell C13 on Cal-UEC worksheet in the Financial Model, which was inputted as 6.986, but the project documentation made available to us contained an assumption of 6.896.

Based on our review, with the exception of the above, we believe that the Assumptions have been properly transcribed into the Financial Model.

With respect to the exceptions and findings noted, as stated above, we did not calculate the financial effect on the Financial Model as the calculation of such sensitivities is beyond the scope of our work.

3. The construction of the Financial Model, insofar as its logical and arithmetic integrity is concerned

Based on our review of the calculations in the Model, together with management responses to queries, the more substantive issues that we identified related primarily to:

- **Hard Coded Numbers** – Many hard-coded numbers have been included in the Financial Model that do not seem to impact any of the calculations. From a presentation standpoint, these numbers may be confusing to a reviewer of the Financial Model. However, were management to run financial sensitivities in the model based on changes in inputs, confusion may exist in determining which inputs are active inputs in the calculation. Changing an inactive input will not reflect appropriately in the final calculations.
• **Side Calculations** - There were a number of side calculations that do not affect the final calculations. From a presentation standpoint, these numbers may be confusing to a reviewer of the Financial Model but do not appear to have an impact on the final numbers calculated.

• **Labeling** - In some instances the labeling contained within the Financial Model was inconsistent with the actual calculation. For example, in the calculation of contingencies the label is, "Last 25% of the Work Package" whereas the actual allocation of the contingency varied from 4-23 months in length. From a presentation standpoint, this labelling may be confusing to a reviewer of the Financial Model but does not have an impact on the final numbers calculated.

Based on the work we have performed and taking into account the above noted findings, the Financial Model appears to have been constructed appropriately, insofar as its logic and arithmetic integrity is concerned.

With respect to the exceptions and findings noted, as stated above, we did not calculate the financial effect on the Financial Model.

**Restrictions**

This report is addressed to BC Hydro. We will not accept responsibility to any other party to whom the report may be shown or who may acquire a copy of the report.

Our review findings, as set out in our report, apply only to the specified version of the Financial Model and that has been made available to us by the Project Team. We will not be under any obligation to perform any work, take account of or comment on any intervening events or model changes after the issue of our report in final form to BC Hydro.

Yours very truly,

Gary Webster
604-646-6367