

Name: Andrew Shadrack

Date: October 11, 2017

I oppose the building of Site C and attach a letter of comment on the Preliminary Report as to the issues that I believe the Commission should factor in to assessing the cost of Building Site C.



Phone: [Redacted]
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October 10th, 2017

British Columbia Utilities Commission
Sixth Floor, 900 Howe Street, Box 250
Vancouver, B.C., V6Z 2N3

Attention: Patrick Wruck, Commission Secretary

Dear Sir:

Re: Comment on Preliminary Report Site C Inquiry

1. Under "*Panel analysis and preliminary findings on the Site C UEC*" the Commission notes:

"The Panel finds that if Mikisew Cree First Nation is correct in its submissions relating to either the potential downstream impacts on the PAD (Peace Athabasca Delta) or litigation relating to potential treaty infringements of Site C then this could impact the costs to Site C and ratepayers, and therefore result in an upward adjustment of the UEC for Site C energy.

The Panel is unclear how, or whether, this is a direct cost to ratepayers. It appears to the Panel that this is a cost that would be borne by taxpayers. We invite further comment on this issue" (A-13, BCUC Site C Inquiry, Preliminary Report, page 87).

A review of the terms and conditions of the 2007 Duncan Dam Water Use Plan, as granted by the BC Comptroller of Water Rights, clearly indicates that BC Hydro has to address and pay for environmental cost mitigations as part of its day to day operations:

https://www.bchydro.com/content/dam/hydro/medialib/internet/documents/environment/pdf/wup_duncan_dam_project_water_use_plan_december_2007.pdf

Thus, in relation to the issues raised by the Misikew Cree in particular, the Commission must factor into its assessment the potential for BC Hydro's cost of operating Site C being increased due to expanded requirements determined as necessary by the BC Comptroller of Water Rights, should the Misikew Cree and other First Nations be successful in their court cases concerning operations of Site C and Treaty Rights?.

2. Second, in the Preliminary Report I see no factoring in of an increase in the operational costs of the BC Fish and Wildlife Compensation Program - an adjunct program that is funded directly by the BC Hydro ratepayers. These costs also need to be factored into the operational cost of Site C.

3. Third, I see no factoring in of the cost of transmitting and delivering Site C power to point-of-use, in terms of power lost during transmission and actual cost of delivering power, and both capital cost of building/upgrading a transmission line and operating a new/upgraded line. Anecdotally, I have been told that the capital cost of building additional transmission lines and/or upgrading could be as high as an additional \$5 billion on top of existing Site C construction costs.

4. Finally, section 2(b) of the *Clean Energy Act* specifically states that increased energy demand must be reduced by 66% by 2020 through adoption of demand side measures and implementation of energy conservation.

Therefore, technically speaking, before Site C can be built in accordance with prescription of the *Clean Energy Act*, increased energy demand needs to be three times that of the production level of Site C.

For the Earth,
Andy Shadrack