

TAHLTAN

Central Government

October 18, 2017

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

Dear Sir/Madam:

Re: Tahltan Central Government comments on Alternative Portfolios

Further to the Commission's letter of October 11, 2017 (Ex. A-22), the Tahltan Central Government (TCG) provides the following comments regarding the Alternative Portfolios prepared by Commission staff (Ex. A-22-1).

The TCG's mandate is to represent the aboriginal title and rights of all Tahltan members to Tahltan territory, located generally in northwest BC. Our territory is rich in resources, including hydroelectric resources. The TCG has established productive relationships with energy project proponents who work with our Nation on a respectful basis, most notably through our partnership with Alta Gas on the 195 MW Forrest Kerr project. The success of this project demonstrates that the TCG is prepared to consider energy projects that cause minimal impact to our lands, waters and fisheries, while ensuring a meaningful role for our people in the design, construction and operation of the projects.

The TCG is aware that Cliff Grandison, President of Alaska Hydro Corporation, has made submissions to the Site C Inquiry (Ex. F11). The gist of Mr. Grandison's submission is that the Commission should consider the More Creek Hydroelectric Project, which is located in Tahltan territory, as a technically and financially viable component of an alternative generation portfolio in the event Site C does not proceed. The TCG is also aware that the Commission's Preliminary Report notes that the More Creek project is in the "pre-development stage", and the Commission is accordingly "reluctant to draw any conclusions" from Mr. Grandison's submissions (Ex. A-13, Appendix A p. 28). We have reviewed the Alternative Portfolios spreadsheet and the summary of portfolio scenarios provided in Ex. A-22. We note that none of three illustrative Alternative Portfolios includes any proposed hydroelectric storage options. We infer from this that the Commission has excluded the More Creek project from the list of generation assets the Commission views as offering viable alternatives to the generation capacity represented by Site C.



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The TCG supports the Commission's decision to exclude the More Creek hydroelectric project from the list of potential generation assets being considered as alternatives to the commissioning of Site C. The More Creek project is located wholly in Tahltan territory. It requires the construction of an 85 m high dam that would flood, and thereby destroy, a 20 km long stretch of More Creek. Over 2100 ha of land would be flooded to create a 2680 ha reservoir. The impacts of this project would be significant, including the destruction of riverine fish habitat and fisheries and loss of cultural sites. In addition, the inundation of More Creek would flood the access road for the Galore Creek Mine, a mining project for which the Tahltan Nation has an established participation agreement.

Based on the information the TCG has to date regarding this project, it does not have the support of our Nation. We accordingly urge the Commission to maintain its current assessment that the More Creek hydroelectric project should not be considered a viable component of an alternative generation portfolio to the commissioning of Site C.

Sincerely,



Nalaine Morin, BASC, EP
Project Manager – Tahltan Central Government

cc. TCG Executive

