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September 8th, 2017

Mr. Patrick Wruck  
Commission Secretary and Manager  
Regulatory Support  
British Columbia Utilities Commission  
Suite 410, 900 Howe Street  
Vancouver, BC V6Z 2N3

Email: [Commission.Secretary@bcuc.com](mailto:Commission.Secretary@bcuc.com)

Dear Secretary Wruck,

**Re: Site C BCUC Inquiry Process**

We have now had an opportunity to review and compare the submissions of BC Hydro and others filed in this proceeding, and we request:

- public disclosure of additional BC Hydro information,
- implementation of additional procedural safeguards, and
- an opportunity for energy expert Robert McCullough (whose report was prepared for and filed jointly by PVLA and PVEA) to meet the Panel when he is in Vancouver on September 13<sup>th</sup>, 2017.

**A. PUBLIC DISCLOSURE OF ADDITIONAL BC HYDRO INFORMATION**

As with all BCUC public proceedings, this inquiry is intended to be open, transparent and inclusive.

However, our review of the BC Hydro submission and additional information filed by BC Hydro on the Site C project website makes it clear that these proceedings are not as open and transparent as other BCUC regulatory proceedings. Information and analysis that would normally be available is either withheld in full or heavily redacted such as Appendix O - Suspension / Termination: Cost Estimate Synopsis PUBLIC which has redactions on 17 of 65 pages.

Greater public disclosure of information will not put the timelines for completion of this inquiry in jeopardy, but instead will contribute to public confidence in the result.

Moreover, it is unclear whether issues of commercial sensitivity will be addressed in a timely manner through the readily available mechanisms of non disclosure agreements and confidentiality undertakings.

Bearing this in mind, we request the following information and analysis be immediately released in relation to the following critical areas:

1. A large number of documents in the B.C. Hydro submission are redacted. These include:

- a. Appendix J - Developments Since Current Load Forecast and Potential Future Developments Affecting Load (Including Electrification) PUBLIC
- b. Appendix B - Attachment 2 - Permits Issued
- c. Appendix O - Suspension / Termination: Cost Estimate Synopsis PUBLIC
- 2. Significant documents from earlier presentations are also redacted. For example:
  - a. Appendix E – 2014 Business Case
  - b. Basis of Project Estimate
  - c. 102 Site C Review - Deloitte questions, August 2017
  - d. 102 Site C Review - Deloitte questions, attachments, August 2017
  - e. 102A Site C Review - Responses to questions raised by Deloitte, August 2017
- 3. Many important calculations lack mathematical support. Workpapers are required to evaluate their accuracy:
  - a. Appendix H - Load Forecast Methodology Technical Appendix
  - b. Appendix K - Portfolio Analysis Assumptions and Load Resource Balances
  - c. Appendix L - Resource Options Considered
  - d. Appendix Q – Rate Impact Calculations
  - e. Appendix R - Rate Impact Calculations
  - f. Appendix R - Attachment 1 - Ratepayer Impact Calculations - Results and Inputs [SIC]

## **B. IMPLEMENTATION OF ADDITIONAL PROCEDURAL SAFEGUARDS**

Currently there is a very limited and procedurally weak process for testing the veracity of the information, reports and analysis in a timely and fair way.

We recognize that the inquiry process must be structured in a manner to meet the timelines set out in the terms of reference. However, these timelines do not necessitate foregoing procedurally fair and reliable mechanisms for openly testing the data, reports and analyses that have been filed in this proceeding.

Nevertheless, there is a solution which will substantively improve the procedural fairness of the process without putting the timelines in jeopardy.

We recommend that the BCUC allow for interrogatories by BC Hydro and experts who have made submissions and then require them to attend a 5 day public hearing at which point they provide their answers and may be cross examined on their reports.<sup>1</sup> This can happen in parallel with information workshops. BCUC can limit the number of witnesses. We respectfully suggest that this is entirely doable within the established timeframe and is an essential step to ensuring that reliable and rigorous analysis, based upon appropriate and accurate information, forms the basis of BCUC's ultimate advice to Cabinet

## **C. TECHNICAL PRESENTATIONS**

BCUC has indicated that if it requires further information or clarification on data and analysis submissions it will contact individuals and organizations to invite them to appear at a Technical Presentation Session. These

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<sup>1</sup> Examples include Marc Eliesen, Adrienne Peacock and Desmond Wilson, Guy Immega, Dr. Karen Bakker, Alexander N. Eunall, Richard Hendriks, Philip Raphals, Marc Lee, Nathan Coles, Jean-François Nolet, Bob Lindstrom, Robert McCullough and Harry Swain,

sessions will be open to the general public to attend but only those invited by the Panel will have the opportunity to participate.

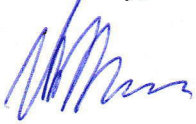
Several expert submissions reveal fundamental differences in the key areas of cost, need and alternatives. As well, the complex nature of expert submissions is such that technical presentations on key issues can only serve to help the BCUC Panel in its deliberations. Bearing this in mind, we wish to make the Panel aware that energy expert Robert McCullough (whose report was filed by PVLA and PVEA in this proceeding) will be in Vancouver on September 13<sup>th</sup> and would appreciate an opportunity to provide you with a technical presentation regarding his report.

Public confidence in the recommendations and outcomes arising from the BCUC Site C Inquiry process depend on ensuring that it is as open, transparent and as procedurally fair as possible compared to other BCUC processes.

We urge you to adopt the above recommendations and thereby increase public confidence in a process, the outcome of which, will figure prominently in the BC Government's deliberations on the fate of the largest capital expenditure in the history of this province.

Please confirm receipt of this letter and contact me if you have any questions. We request an early response as the inquiry process is in progress.

Yours truly,



Ken Boon President, Peace Valley Landowner Assoc.

Yours truly,



Ruth Ann Darnall President, Peace Valley Environment Assoc.