September 25, 2017

BC Utilities Commission
Site C

It is a pleasure to be here on behalf of 520 Commercial tree fruit growers who are members of the BC Fruit Growers' Association. My name is Glen Lucas, I manage the BC Fruit Growers Association and our office is in Kelowna. Our vision is a prosperous, sustainable, and innovative tree fruit sector in BC that grows flavourful, high quality products that improve health.

With regard to Site C, the agriculture sector associations have a long experience with Site C - opposing it 20 years ago when it was turned down. Our reason then and now is the destruction of valuable farmland in the Peace River valley. The BCFGA previously opposed Site C due to its support for the ALR. Our association's support for the ALR has strengthened since Site C was last proposed in the mid-1990s.

Site C is underway, and the question posed to the BCUC is "should it be completed, delayed or stopped?" We trust that the BCUC will do a good job in completing its work on this delayed and now rushed assessment.

We wish to contribute four ideas to the BCUC's consideration of Site C:

First, while Agriculture land is not directly to be taken into account, we feel that the economic analysis should at least note the value of the farmland being flooded and the annual income it generates.

Second, a problem with Site C is that it is a "large bite". Others have pointed out that wind, solar, tidal and other types of power are smaller projects, taking the risk out the energy demand estimates. At a conference held two years ago on the Columbia River Treaty, we asked several energy engineers about the cheapest source of electrical power - we were expecting an answer of hydro power, with wind, tidal and solar efficiencies improving every year. However, the answer was a surprise: everyone we asked replied that the cheapest source of energy is conservation.

Third, we would like to propose addition of another energy source which would be much more flexible in scale than Site C. It is speculative at this time, but here in the Okanagan, we have high plateau reservoirs for water supply. Hydro power is usually not a factor in these projects, as the municipal water utilities are focused on water supply and quality, not electricity generation. While the volume of water in Okanagan reservoirs does not compare to Site C, the elevations for the reservoirs are 1,000 meters higher than the discharge. We would need reservoirs 1/10 the size of site C to generate the same power in the Okanagan. Further, if BC Hydro invested in OKanagan reservoirs to increase their size, this investment provide other benefits - such as flood prevention, environmental or 'fish flows', and human uses. There are several reservoirs, making the idea of power generation more flexible than the Site C mega project.

Fourth, our association has studied the Columbia River Treaty (due to its negative impact on the BC tree fruit and vegetable sectors) and appreciate the suggestion of returning the CRT's

downstream benefit (50% of all power generated by Columbia River dams in the US) to BC, rather than selling it to areas outside BC as is currently done. We also recognize that bringing this power home will require investment in power transmission. There is metion that counting on the downstream CRT benefits is risky due to the possibility of either the US or Canada cancelling the CRT on 10 years notice. However, we suggest the focus be on a minimum of 10 years certainty under the CRT, versus the risk of Site C relying on unreliable energy projections.

We would be very pleased if the BCUC considered the flexibility and other benefits of these smaller scale power generation ideas, compared to the large scale of site C and the risk that it poses. We also propose including the cost of lost farmland in the Site C analysis.

BCUC has a respected role in reviewing Site C, and we appreciate your efforts.

Thank you for listening.