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GSC Concerned Citizens Association 302 – 733 Johnson St, Victoria, BC, V8W 3C7 250-381-4463 www.sqwalk.com

Hon. Richard Neufeld Minister of Energy and Mines Legislative Buildings Victoria, BC, V8V 1X4

and

Hon. George Abbott Minister of Sustainable Resource Management Legislative Buildings Victoria, BC, V8V 1X4

April 4, 2005

Dear Ministers Abbott and Neufeld,

## Re: Compliance Energy Corporation coal-fired thermal electric proposal

The BC Sustainable Energy Association and the GSX Concerned Citizens Coalition are writing to urge you: (a) to designate as a reviewable project under the Environmental Assessment Act the Compliance Energy Corporation proposal for a coal-fired thermal electric power plant near Princeton, British Columbia; and (b) to direct the BC Utilities Commission review the project to determine whether it is in the public interest.

Coal-fired thermal generation is one of the most polluting and greenhouse-gas-intense forms of generation. Allowing a coal-fired generation plant in BC would significantly impair efforts to control air quality in BC and to reduce BC's contribution to global climate change. It would also harm Canada's position in the international community, where nations are making increasingly urgent efforts to control greenhouse gas emissions and minimize global climate change. It would also harm BC's strategic position for the development of modern energy industries that can address our present needs without unduly harming our future prospects.

Allowing the Compliance proposal would set a BC precedent. It is incumbent on the BC Government not to do so without a full and thorough assessment of the positive and negative implications and of whether, on balance, the project is in the public interest.

A full and thorough environmental review is required in order to assess both the environmental effects of the plant and alternative technologies that may be available to reduce or mitigate its environmental harm. The terms set for the environmental review should clearly define the criteria by which the environmental and other attributes of the proposal will be evaluated and allow opportunities for public input and the testing of evidence.

A Utilities Commission review is required in order to determine whether the proposal is in the public interest. As you know, the Environmental Assessment Act does not provide for a balancing of the negative environmental effects of a project against its possible benefits, including economic, and therefore the environmental assessment is not able to determine whether a project is in the public interest.

The Utilities Commission assessment should include an oral public hearing, with at least one round of information requests.

Sincerely,

Thomas Hackney
President
GSX Concerned Citizens Coalition

Guy Dauncey
President
BC Sustainable Energy Association

cc:

Jim O'Rourke, President, Compliance Energy Corporation Joan Hesketh, Executive Director Environmental Assessment Office