



GSX Concerned Citizens Coalition

The Georgia Strait Crossing Concerned Citizens Coalition
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Joan Hesketh,
Executive Director
Environmental Assessment Office
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**Re: Environmental Assessment Certificate E03-03,
the Vancouver Island Generation Project
and the Duke Point Power Project**

Dear Ms. Hesketh,

Further to the GSX Concerned Citizens Coalition's ("GSXCCC") letter of 5 January, addressed to Minister Abbott and copied to your office, we wish to reiterate our information concerning material reasons why the Environmental Assessment Certificate issued to Vancouver Island Energy Corporation with respect to the Vancouver Island Generation Project (VIGP) should not be applied to the Duke Point Power (DPP) project without an appropriate public process.

While VIGP and DPP have many similarities, they have the following material differences:

- DPP has consigned the majority of its capacity and energy to BC Hydro within an Electricity Purchase Agreement (EPA) that provides for flexible dispatchability. The EPA, Appendix 3, contains detailed specifications (including ramp up time, fuel use, and payment formula) for multiple monthly cold, warm, and hot starts. VIGP, in contrast, was a base load plant.
- The nominal capacity of DPP is 252 MW without duct firing and 280 MW with duct firing. The capacities of VIGP were 265 MW and 295 MW respectively. These differences betray differences in equipment. In fact, the exact models of key DPP components may not have been selected as yet.
- In the BCUC hearing concerning DPP, a BC Hydro representative signaled a desire for the addition of dual fuel capability:

MS. HEMMINGSEN: ... We could conceivably enter into an agreement with them to revise the terms of their EPA. I would also like to get the dual fuel capability option in there as well ...

(BCUC Hearing, Ex parte in camera session, Transcript 8, p. 1742, lines 7-14)

Pursuant to Section 4 of the Certificate, any material change to the design, location, construction, or operation of the Project requires that VIEC apply in writing for an amendment. We are advised that no such application has been made. However, news reports today are that DPP intends to commence construction almost immediately.

Please advise GSXCCC what process will be followed by the EAO or the Minister of Sustainable Resource Development to ascertain and assess possible material changes in the project. Please advise GSXCCC what steps have already been taken by the EAO or the Minister to carry out that process and what steps remain to be taken. Please advise us what opportunities will be made available to the public to have input into this process. We also ask that you inform the GSXCCC if any application is received in respect of the Environmental Assessment Certificate.

We again remind you that there was strong public concern about the VIGP proposal in 2003, and we urge you not to permit the VIGP Certificate to be used for a *de facto* different project or to make any changes in the Certificate without a thorough review, including full public participation.

Sincerely,

Thomas Hackney, President

cc. George Abbott, Minister, Sustainable Resource Management