



# ENGAGEMENT SUMMARY REPORT

Proposed amendment to the Greenhouse Gas Reduction (Clean Energy) Regulation  
to advance renewable energy projects that displace diesel use in BC Hydro  
Non-Integrated Areas

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December 21, 2023

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## Executive Summary

In the fall of 2023, the British Columbia (BC) Ministry of Energy, Mines and Low Carbon Innovation (the Ministry) engaged with First Nations and civic governments on a proposed amendment to the Greenhouse Gas Reduction (Clean Energy) Regulation (GGRR) under the *Clean Energy Act*, which would require the British Columbia Utilities Commission to allow BC Hydro to recover the costs from ratepayers of Energy Purchase Agreements for Indigenous-owned renewable energy projects in Non-Integrated Areas (NIAs) signed before December 31, 2029, up to a prescribed total expenditure limit.

The Ministry developed an engagement plan, intentions paper, and information session presentation on the proposed regulatory amendment. Engagement packages and invitations were sent to First Nations with NIA communities in their territories, neighbouring First Nations who share territory with NIA communities, Indigenous organizations with an interest in the topic, and civic communities located within NIAs. Information was also posted publicly on the Ministry website.

First Nations and civic government representatives provided feedback on the use of the GGRR as a regulatory tool; the definition of Indigenous-owned renewable energy projects; types of renewable energy projects covered by the amendment; the proposed time-limit of December 31, 2029 for the signing of EPAs that would be covered by the amendment; and principles for the development of a total expenditure limit as well as several related topics. Participants noted that transparency was particularly important in defining and calculating costs in negotiations with BC Hydro and designing the total expenditure limit.

The Ministry will review the feedback received to assess whether to proceed with the proposed regulatory amendment. If the proposed regulatory amendment is supported by those engaged, the Ministry will proceed and initiate Phase 2 of the engagement process.

## Introduction

The CleanBC Remote Community Energy Strategy (RCES) is a multi-stakeholder initiative led by the Ministry to reduce the use of fossil diesel fuel for electricity generation and heating in remote communities by 80% by 2030. The use of regulatory measures to support renewable energy generation projects that displace diesel in remote communities served by BC Hydro, referred to as Non-Integrated Areas (NIAs), is a RCES priority.

NIAs are not connected to the integrated BC Hydro grid but instead rely on distributed microgrids that are powered by a mix of diesel and renewable energy generation. NIAs collectively consume about 85% of the diesel used for electricity generation in remote communities in British Columbia, representing up to 50,000 tonnes of greenhouse gas emissions per year. Most NIAs are governed by Indigenous nations.

BC Hydro plans to enter into several Energy Purchase Agreements (EPAs) to purchase electricity from new renewable energy projects in NIAs. BC Hydro is required to seek acceptance of each EPA by the British Columbia Utilities Commission (BCUC) under section 71 of the *Utilities Commission Act (UCA)*.

In determining whether to accept an EPA, the BCUC must consider whether the EPA is in the public interest based on a variety of factors, including the interests of ratepayers, the purchase price of the electricity, and the need for energy. The BCUC may not be prepared to accept upcoming EPAs where the cost of electricity is above the cost of diesel, despite the associated climate and Indigenous reconciliation benefits of implementing renewable electricity projects in remote communities.

To provide enhanced certainty for renewable energy projects in NIAs, the Ministry proposed to bring forward an amendment to the Greenhouse Gas Reduction (Clean Energy) Regulation (GGRR) for Cabinet consideration. The GGRR amendment would require the BCUC to allow BC Hydro to recover the costs from ratepayers of EPAs for Indigenous-owned renewable energy projects in NIAs signed before December 31, 2029, up to a maximum expenditure cap.

In the fall of 2023, the Ministry engaged with impacted Indigenous Nations and civic governments on the proposed regulatory amendment. Additional information on the intention of the proposed regulatory amendment can be found in Appendix A.

This report is a summary of the feedback received during the fall 2023 engagement activities.

## Engagement Approach

### Objectives

The purpose of the engagement process was to inform interested Indigenous nations and civic communities about the GGRR's potential role in advancing renewable energy projects in NIAs and to collect input on its application.

Planned engagement was separated into two phases. In Phase 1, the Ministry was interested in understanding the views and concerns of Rights and Title Holders, Indigenous organizations, and civic governments with regards to:

- A) The use of the GGRR as a regulatory tool;
- B) The definition of Indigenous-owned renewable energy projects;
- C) The types of renewable energy projects covered by the amendment;
- D) The proposed time-limit of December 31, 2029, for the signing of EPAs that would be covered by the amendment; and
- E) Principles for the development of a total expenditure limit.

This report is a summary of feedback received during Phase 1 of engagement. The Ministry will use the feedback provided to assess whether to proceed with a GGRR amendment and initiate Phase 2 of the engagement process. In Phase 2, the Ministry will share additional information about the proposed amendment based on input from Phase 1, such as the total expenditure limit for Indigenous-owned renewable energy projects in NIAs.

Additional information on the engagement approach can be found in Appendix B.

## Principles

Recognizing that engagement fatigue is prevalent amongst First Nations generally, but especially among those with NIA communities, the Ministry was committed to the following principles to allow for meaningful opportunities to participate:

- Engaging Rights and Title Holders and others over an extended timeframe;
- Being available to answer questions, collect feedback, and schedule ad hoc meetings;
- Providing multiple avenues for the provision of feedback including verbal and written;
- Providing materials in advance of engagement opportunities in accessible formats; and
- Adjusting the process wherever possible to accommodate the needs of participants.

## Limitations

The proposed GGRR amendment is intended to be a short-term solution to address the uncertainty of EPA approval for renewable energy projects in NIA communities. It is not intended as a substitute for broader, long-term regulatory changes required to address other policy issues associated with diesel reduction in NIAs.

In the future, legislative amendments could also be proposed that would enable decision-making by the BCUC that balances ratepayer impacts with climate, reconciliation, and other objectives. Such amendments would need to consider implications for utilities and ratepayers across the province and were considered out of scope for the current proposed regulatory amendment.

## Process and timeline

The engagement process included developing an intentions paper on the proposed regulatory amendment (see Appendix A); drafting an engagement plan (see Appendix B); inviting impacted First Nations and civic governments to engage (see Appendix C); posting materials publicly on the Ministry website, hosting two virtual information sessions (see Appendix D); hosting on-request, one-on-one sessions with Indigenous Nations and civic governments; developing Frequently Asked Questions (FAQ) from the information sessions and individual sessions (see Appendix E); and releasing this summary engagement report. The timeline for Phase 1 engagement is provided in Table 1.

*Table 1. Timeline of engagement activities*

<b>Timeline</b>	<b>Activity</b>
Aug/Sept 2023	Develop draft engagement plan with input from the First Nations NIA Working Group
Sept 28, 2023	Distribute Intentions Paper and post on Ministry website
Sept 28, 2023	Send invitation packages to impacted Indigenous Nations and civic governments
Oct 17, 2023	Host virtual information session #1
Oct 24, 2023	Host virtual information session #2
Nov 20, 2023	Develop and share Frequently Asked Questions (FAQs)
Nov 30, 2023	Suggested deadline for submitting written and oral feedback
Dec 31, 2023	Develop and share summary engagement report

## Invitations

Invitations were sent to First Nations with NIAs in their territory, neighboring First Nations who share territory with NIA communities, Indigenous organizations with an interest in the topic, and civic communities that are located within NIAs. The invitation list is provided in Appendix F.

## Information sessions

The two virtual information sessions were led by Ministry staff. Representatives from BC Hydro joined the sessions to help answer questions related to BC Hydro activities. The Ministry presented the same presentation at each information session, which included background information, rationale for the proposed regulatory amendment, and points on which it was seeking input. The information session presentation is provided in Appendix H. Participants asked questions, raised points of concern, and provided feedback throughout both sessions.

## Participant Feedback

### Participation

A total of 28 individuals, representing seven First Nations, three civic governments, one organization representing a First Nation, and two interested organizations participated in one or both information sessions. A list of session participants is provided in table 2.

Table 2. Attendance numbers for virtual information sessions.

Attendance numbers				
session date	Participants	First Nations	Civic Governments	Organizations
Oct 17	11	3	1	2
Oct 24	17	7	2	4

Representatives of two First Nations and three civic governments participated in virtual meetings with the Ministry. A list of meeting participants is provided in table 3.

Table 3. Participant numbers in individual meetings.

Participants	First Nations	Civic Governments
9	2	3

Representatives from First Nations, Indigenous organizations, civic governments and organizations, and interested organizations participated in the information sessions and/or individual meetings are provided in Table 4.

Table 4. First Nations, Indigenous, civic and interested organizations represented in engagement activities.

First Nations	Regional Districts
Gitga'at	Central Coast
Nuxalk	Northern Rockies
Old Masset Village Council	Indigenous Organizations
Skidegate Band Council	First Nations Leadership Council
Tsilhqot'in	Interested Organizations
Uchucklesaht	Urban Systems
Ulkatcho	Pembina Institute
	Community Improvement District
	Atlin

## Key Themes

Throughout responding to the Intentions Paper, participating in virtual information sessions and/or individual meetings, and submitting written feedback, participants expressed concerns regarding the following key themes:

- defined costs for the total expenditure limit;
- predictability and equity in EPA negotiations with BC Hydro;
- load growth and infrastructure upgrades;
- impacts on ratepayers, especially on those in NIAs; and
- transparent information sharing.



In the first information session, the primary topics of discussion included the intent of the proposed amendment and potential impact on ratepayers, particularly those within NIAs. A participant requested a list of the NIAs, which may be found in Appendix G.

In the second information session, the discussion focused on EPA negotiations, the total expenditure limit, and the need for regulatory change with broader scope than the proposed GRR amendment. Written feedback received covered the same topics in further detail.

### Summary of Feedback on Proposed Amendment

The Ministry requested feedback on the following topics specifically:

- A. The use of the GRR as a regulatory tool;
- B. The definition of Indigenous-owned renewable energy projects;
- C. The types of renewable energy projects covered by the amendment;
- D. The proposed time-limit of December 31, 2029, for the signing of EPAs that would be covered by the amendment; and
- E. Principles for the development of a total expenditure limit.

Below is a summary of this feedback, as well as additional feedback received on related topics.

#### A. Use of the GRR as a regulatory tool

The proposed GRR amendment is intended to provide enhanced certainty for renewable energy projects in advanced stages of development in NIAs. The Ministry is aware of fourteen projects that may sign EPAs before December 31, 2029, but additional projects may come forward. The proposed regulatory amendment will strengthen certainty of BCUC acceptance of EPAs filed by BC Hydro.

The BCUC retains the ability to determine which ratepayers should bear the cost of any EPA that falls within the proposed GRR amendment. The Ministry considers it low risk that the BCUC would assign the incremental costs exclusively to one or more NIA customers, given that this would contradict the intent of the GRR amendment.

Participants expressed frustration with the limits of the proposed amendment and hoped to see this amendment as a start to a broader suite of regulatory changes. Participants shared that they were interested in further regulatory changes with broader scope and emphasized the desire to achieve 100% diesel displacement in NIAs.

A participant questioned if the GRR amendment was the right regulatory tool and whether it would have any effect on EPA negotiations. There was interest in knowing what other policies and mandates are being pursued by the Ministry to support renewable project development in NIAs. One participant wanted information on what work was being done within the Ministry on legislative changes that had greater scope than the proposed regulatory amendment.

For one participant, the limited scope of the proposed regulatory amendment was worrisome given coming elections and environmental protection measures. Another participant reminded the group that members of the RCES Working Group<sup>1</sup> have recommended the development of an Indigenous Energy Act.

There also was concern shared that this amendment would limit BCUC's authority, while BC Hydro would still be mandated to negotiate the lowest EPA rate possible in support of economic efficiency. The concern expressed was that the proposed regulatory amendment would not "level the playing field" in negotiations between First Nations and BC Hydro.

A participant asked for an update on initiative agreements enabled under the *Low Carbon Fuels Act*. The Ministry responded that *Low Carbon Fuels Act* implementation is taking longer than expected, but staff will share more information when it is available.

#### B. Definition of Indigenous-owned renewable energy projects

The Ministry received no feedback on this subject.

#### C. Types of renewable energy projects covered by the amendment

In considering the total expenditure limit and equitable access for renewable energy projects, one participant suggested that biomass projects could be removed from the scope of the amendment, if necessary given the high cost of biomass projects.

#### D. Proposed time-limit of December 31, 2029, for the signing of EPAs that would be covered by the amendment

There was a shared concern among participants that the proposed timeline could be limiting. It was shared that many First Nations are struggling to expand their communities and do not want to be in a position where they run out of time to develop renewable energy projects and potentially limit future growth.

A participant spoke of concern that six years was not enough time to be ready for EPAs. Another participant added that the later projects will likely be more expensive, but they will be important to reaching 100% diesel reduction. The time limit might not support these projects.

#### E. Principles for the development of a total expenditure limit

Equity and access for all First Nations' projects were raised as important considerations for the expenditure limit. A participant stated that First Nations should not be pitted against each other because of an expenditure limit. There was also concern that earlier projects might use up much of the expenditure limit. Participants suggested some avenues to ensure equal opportunity for First Nations:

- create a minimum expenditure allowance per community;
- incentivize earlier projects so they act quickly;
- separate the avoided cost of diesel from all other costs; and
- make a base or floor amount for the EPA price.

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<sup>1</sup> In 2021, the Ministry invited representatives from remote Indigenous nations to participate in a working group to inform the continued development of RCES. The resulting RCES Working Group produced a [comprehensive recommendations report](#), which highlighted the need for regulatory and legislative support for diesel-displacing renewable energy projects in remote communities.

Additional recommendations shared by participants on principles for the development of the expenditure limit included:

- the limit should be based on 100% diesel displacement;
- the limit should be based on a purchase price that reflects a return on investment;
- the amendment should include a reasonable formula for determining a price for diesel; and
- the expenditure limit should be separated into two parts: one to recover the avoided cost of diesel and the other to recover any other costs required to enable project development.

Participants wanted clarity on what costs would be considered eligible for cost recovery from ratepayers under the expenditure limit and how these costs would be calculated.

A participant also expressed concern regarding BCUC's ability to analyze costs within the expenditure limit in the absence of certainty around recoverable costs.

Two participants were reluctant to comment on the total expenditure limit without more baseline information, particularly the cost of diesel in each community and what costs BC Hydro will be able to recover from ratepayers.

Another participant asked if NIAs would be involved in determining what costs would be included in the expenditure limit.

## Additional Feedback

### Transparency

Participants noted that transparency was particularly important to the calculation and definition of costs in EPAs and the total expenditure limit. Participants expressed that an accurate assessment of the viability of renewable energy projects depends on transparent information being available from BC Hydro and the Ministry. It was shared that predictability in commercial negotiations means First Nations can be more efficient with their own resources.

Participant expressed a number of key areas requiring improved transparency and standardization:

- Cost of diesel or standardized guidance on how to calculate the cost;
- The amount of renewable energy penetration required to offset/be comparable to the cost of diesel;
- The time horizon when comparing renewable energy projects to diesel generation;
- Whether externalities like the cost of carbon and cost of fuel spills, for example, can be included in the cost of service; and
- Baseline assumptions for the cost of fuel today and how this cost will escalate over time.

### EPA negotiations

EPA negotiations were discussed throughout the engagement process. Many participants had significant concerns about transparency and standards around pricing and EPAs. Participants discussed how every NIA community should have access to the avoided cost of diesel, as a means to determine the cost-effectiveness and viability of a project.

One participant asked about current EPA's and whether they would be renegotiated should the proposed regulatory amendment proceed. The Ministry responded that the amendment will not force renegotiations of EPAs.

#### Rate payer impacts

Several participants spoke of their apprehension about ratepayer impacts, particularly rate increases borne solely by NIA communities.

One participant expressed the need for ratepayer protection given the lack of information on the expenditure limit, which makes rate impacts uncertain and unpredictable.

#### Economic reconciliation

Many participants view renewable energy project development as a path to economic reconciliation. Economic reconciliation was defined, in part, as long-term and stable economic development.

A participant expressed that in the absence of more information, such as the avoided cost of diesel in each community, the proposed regulatory amendment only provides predictability for BC Hydro, not First Nations, and that it does not align with reconciliation.

#### Load growth

Some participants expressed the importance of including infrastructure upgrades and opportunities for load growth in negotiations with BC Hydro, as these are considered vital to First Nations' economic development.

Participants agreed that economic development was an important aspect of their diesel reduction efforts and did not want renewable energy project development to be limited by current electricity demand. Participants suggested that the proposed regulatory amendment should not close any doors on future load growth to promote economic development.

Another participant spoke of communities being constrained by lack of utilities and that capacity for load growth was key to a region's success.

#### Grid stability

A participant linked economic development and energy reliability. It also was expressed that grid stability is required to ensure renewable energy projects can be installed without concern for failure or diminished power quality.

#### Grant funding

Participants raised the issue of how grant funding should be treated in EPA negotiations with BC Hydro. The recommendation was for grant funding to be treated as a First Nation's equity contribution. One participant noted that grant funding should not be used to subsidize BC Hydro's capital expenditures.

#### Diesel reduction targets

Some participants expressed concern about targets for diesel reduction in remote communities. There was a strong desire among participants to get to the target of 100% diesel reduction in remote communities. It was also expressed that First Nations should be allowed to pursue their own targets, including 100% renewable energy penetration, and not be limited to an 80% target by BC Hydro.

A participant requested that BC Hydro set and publish their own diesel reduction targets for NIAs. Another participant thought the proposed regulatory amendment fell short of supporting an already established target, the CleanBC 80% by 2030 diesel reduction target.

## Next Steps

Feedback on the proposed regulatory amendment was submitted up until December 19, 2023.

The Ministry will continue to review feedback received to assess whether to proceed with the proposed regulatory amendment. If the proposed regulatory amendment is supported by those engaged, the Ministry will proceed and initiate Phase 2 of the engagement process, which will include an update on the proposed expenditure limit and process and timeline for submitting the proposed regulatory amendment to Cabinet for consideration.

# INTENTIONS PAPER

Proposed amendment to the Greenhouse Gas Reduction (Clean Energy) Regulation to advance renewable energy projects that displace diesel use in BC Hydro Non-Integrated Areas

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September 28, 2023

## Introduction

The Province of British Columbia (the Province) has a CleanBC goal of reducing the use of fossil-based diesel fuel for electricity generation and heating in remote communities by 80% by 2030. The CleanBC Remote Community Energy Strategy (RCES) is a multi-stakeholder initiative led by the Ministry of Energy, Mines and Low-Carbon Innovation (the Ministry) to achieve this goal. The use of regulatory measures to support renewable energy generation projects that displace diesel in remote communities served by BC Hydro, referred to as Non-Integrated Areas (NIAs), is a RCES priority.

NIAs are not connected to the integrated BC Hydro grid but instead rely on distributed microgrids that are powered by a mix of diesel and renewable energy generation. NIAs collectively consume about 85% of the diesel used for electricity generation in remote communities in British Columbia (B.C.), representing up to 50,000 tonnes of greenhouse gas emissions per year. Most NIAs are governed by Indigenous nations.

The Province has invested significant resources towards the development of renewable energy projects in remote communities, including \$59 million in the Community Energy Diesel Reduction (CEDR) program administered by the New Relationship Trust. Several of the projects supported by CEDR and federal funding partners will reach the construction stage in the next 1-3 years, with additional projects reaching an advanced stage of development within 5 years.

BC Hydro plans to enter into several new Energy Purchase Agreements (EPAs) to purchase electricity from these new renewable energy projects. BC Hydro is required to seek acceptance of each EPA by the British Columbia Utilities Commission (BCUC) under section 71 of the *Utilities Commission Act* (UCA).

In determining whether to accept an EPA, the BCUC must consider whether the EPA is in the public interest based on a variety of factors, including the interests of ratepayers, the purchase price of the electricity, and the need for energy. The BCUC may not be prepared to accept upcoming EPAs where the cost of electricity is above the cost of diesel, despite the associated climate and Indigenous reconciliation benefits of implementing renewable electricity projects in remote communities.

In many NIA communities, the total cost of transitioning to renewable energy is higher than the cost of diesel generation. This is primarily because the transition involves the combined operation of existing diesel generators (for backup and reliability), the commissioning of new, renewable energy generation and, in some cases, battery systems. Some of the upcoming renewable energy projects are expected to be near the cost of diesel generation, but others will be higher. If the BCUC does not accept the EPAs, these projects will not move ahead, and the Province will not achieve its diesel reduction goals in remote communities.

## Engagement to date

In 2021, the Ministry of Energy, Mines, and Low-Carbon Innovation (the Ministry) invited representatives from remote Indigenous nations to participate in a working group to inform the continued development of RCES. The resulting RCES Working Group produced a comprehensive recommendations report<sup>2</sup>, which highlighted the need for regulatory and legislative support for diesel-displacing renewable energy projects in remote communities.<sup>3</sup>

In March 2023, the Ministry hosted engagement sessions with Indigenous nations in NIA communities to discuss the need for regulatory changes to facilitate the development of Indigenous-owned renewable energy projects. The aim of this early engagement was to confirm the Ministry's understanding of previous feedback from remote communities and to discuss potential regulatory responses.

During the engagement session on March 9, 2023, the Ministry presented a list of policy issues for consideration. The following issues are associated with renewable energy project development in NIAs:

- Uncertainty of project approval;
- Cost of upgrades;
- Unexpected costs;
- Uncertainty of purchase price; and
- Purchase price amount.

The Ministry then reviewed existing regulatory tools that could respond to the issues above. Under existing legislation, there are three main regulatory tools to support the implementation of renewable energy projects in NIAs, including:

- *Clean Energy Act*: Under the authority of section 18 of the *Clean Energy Act*, Cabinet may amend the Greenhouse Gas Reduction (Clean Energy) Regulation (GGRR) to require the BCUC to allow BC Hydro to recover the costs from ratepayers of EPAs for a class of projects that result in greenhouse gas reductions, such as diesel-displacing projects in NIAs.
- *Utilities Commission Act* exemption: Under the authority of section 22 of the *Utilities Commission Act* (UCA), the Minister responsible for the *Hydro and Power Authority Act* may exempt parties from the requirement to file an EPA under section 71 of the UCA.

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<sup>2</sup> [https://www2.gov.bc.ca/assets/gov/farming-natural-resources-and-industry/electricity-alternative-energy/community-energy-solutions/rces\\_working\\_group\\_final\\_report\\_2022\\_06\\_01](https://www2.gov.bc.ca/assets/gov/farming-natural-resources-and-industry/electricity-alternative-energy/community-energy-solutions/rces_working_group_final_report_2022_06_01)

Exemptions may be issued on a case-by-case basis and cannot be issued for a group or class of projects.

- *Utilities Commission Act* direction: Under the authority of section 3 of the UCA, Cabinet may direct the BCUC to accept EPAs for a class of projects, such as diesel-displacing renewable energy generation projects in NIA communities and require the costs of those agreements to be recovered from all ratepayers.

Lastly, the Ministry reviewed possible parameters to guide the use of regulatory tools. The parameters that were put forward for discussion included:

- Project timing;
- Type of project;
- Project cost;
- Project ownership structure; and
- Ratepayer recovery.

The Ministry heard that Indigenous-led renewable energy projects are key to achieving the goals of many Indigenous nations, including energy sovereignty, economic development, and cultural revitalization. As such, participants were highly invested in understanding the implications of regulatory changes for projects in development and stressed the importance of ongoing BCUC oversight and involvement.

Participants also emphasized the need for more information regarding the regulatory tools and requested that the Ministry cultivate a deeper understanding of the resources needed for Indigenous nations to participate in engagement. The information that follows is partly a response to these requests. A full summary of the feedback received through the early engagement sessions is available in a [summary report](#).<sup>4</sup>

## Proposed approach

To provide enhanced certainty for renewable energy projects in NIAs, the Ministry proposes to bring forward an amendment to the Greenhouse Gas Reduction (Clean Energy) Regulation (GGRR) for Cabinet consideration. The GGRR amendment would require the BCUC to allow BC Hydro to recover the costs from ratepayers of EPAs for Indigenous-owned renewable energy projects in NIAs signed before December 31, 2029, up to a maximum expenditure cap.

Further background information on the GGRR and proposed amendment is provided below.

*What is the GGRR and how has it been used?*

Within the [Greenhouse Gas Reduction \(Clean Energy\) Regulation](#)<sup>5</sup> (GGRR), Cabinet can use one or more criteria to define a class of projects, programs, contracts, or expenditures which utilities may carry out to reduce greenhouse gas emissions. A project, program, contract, or expenditure

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<sup>4</sup> [https://www2.gov.bc.ca/assets/gov/farming-natural-resources-and-industry/electricity-alternative-energy/community-energy-solutions/summary\\_of\\_virtual\\_engagements\\_with\\_indigenous\\_nations\\_in\\_non-integrated\\_areas\\_-\\_march\\_2023.pdf](https://www2.gov.bc.ca/assets/gov/farming-natural-resources-and-industry/electricity-alternative-energy/community-energy-solutions/summary_of_virtual_engagements_with_indigenous_nations_in_non-integrated_areas_-_march_2023.pdf)

<sup>5</sup> [https://www.bclaws.gov.bc.ca/civix/document/id/complete/statreg/102\\_2012](https://www.bclaws.gov.bc.ca/civix/document/id/complete/statreg/102_2012)



that falls within the defined class is called a “prescribed undertaking.” The BCUC must not prohibit a utility from carrying out a prescribed undertaking and must allow a utility to recover the costs it incurs to carry out a prescribed undertaking in rates.

The GRR was put in place in 2012 and has been amended over time to include a variety of new prescribed undertakings. For example, in June 2020 amendments added a prescribed undertaking for electric vehicle charging stations, allowing utilities to recover costs from ratepayers for public fast charging infrastructure that meets the defined criteria.

*What would the GRR amendment specify?*

The Ministry proposes to amend the GRR to add a prescribed undertaking related to diesel reduction in NIAs. The prescribed undertaking would ensure that BC Hydro is able to recover the costs of an EPA for Indigenous-owned renewable energy projects in NIAs that are signed before December 31, 2029, up to a maximum expenditure cap.

The Ministry, in consultation with Indigenous nations, may need to provide a definition of Indigenous-owned renewable energy projects that displace diesel in NIAs, for the purposes of the GRR amendment. The definition would also specify which renewable energy technologies are considered a prescribed undertaking under the amendment.

The amendment would be time-limited to align with the timeline of the RCES diesel reduction target, which aims to reduce diesel for electricity and heating in remote communities by 80% by 2030. EPAs signed before the proposed date of December 31, 2029, would be considered under the amendment. If approved by Cabinet, the GRR amendment would come into effect in 2024, enabling a five-year window for the negotiation and signing of EPAs.

The amendment would also include a maximum expenditure limit. The inclusion of a total expenditure limit is intended to protect ratepayers while also promoting diesel reduction in NIAs. The Ministry has not yet determined the amount of the maximum expenditure limit.

*Why propose a GRR amendment over other possible regulatory tools?*

Among the available regulatory tools, a GRR amendment provides broad regulatory coverage for renewable energy projects in NIAs while retaining BCUC oversight in the acceptance of EPAs. A GRR amendment also permits flexibility, as it does not preclude the Minister from issuing future exemptions under section 22 of the UCA. The Ministry, for example, may consider the need for exemptions for renewable energy projects in NIAs whose EPAs are submitted for approval by the BCUC before a GRR amendment can be brought into effect.

*What are the key advantages of using the GRR?*

A GRR amendment provides more certainty around EPA approval for Indigenous-led renewable energy projects in NIAs. It aims to support the clean energy objectives held by many Indigenous nations and supports the CleanBC diesel reduction goal for remote communities.

The 5-year timeline for the GRR amendment provides enhanced certainty for renewable energy projects in NIAs with EPAs signed prior to December 31, 2029, while limiting ratepayer

impacts to currently known projects. The GGRR amendment could be further amended to extend beyond 2029, if deemed necessary at that time.

*What are the limitations of a GGRR amendment?*

The GGRR amendment is designed to be a short-term solution to address uncertainty of EPA approval for known renewable energy projects in NIA communities. It is not intended as a substitute for broader, long-term regulatory changes that may be required to address other policy issues associated with diesel reduction in NIAs.

In the future, legislative amendments could also be proposed that would enable decision-making by the BCUC that balances ratepayer impacts with climate, reconciliation, and other objectives. Such amendments would need to consider implications for utilities and ratepayers across the Province and are considered out of scope for the current proposal.

BC Hydro is currently engaging with NIA communities on two regulatory submissions that will support diesel reduction efforts. In December 2023, BC Hydro plans to submit a proposal for the regulatory oversight of long-term resource plans in the NIAs to the BCUC. In March 2024, BC Hydro plans to submit a NIA Strategy that outlines a strategic plan to improve the accessibility of clean, reliable, and affordable energy in the NIAs. BC Hydro also intends to release information about its upcoming commercial strategy in Fall 2024, which will introduce more certainty around purchase price.

*What is the ratepayer impact of this approach?*

The potential ratepayer impact of the EPAs for renewable energy projects in NIAs that would be covered by the proposed GGRR amendment would depend on the expenditure limit established in regulation; the Ministry expects the amendment to have a minimal impact on rates.

The BCUC retains the ability to determine which ratepayers should bear the cost of any EPA that falls within the proposed GGRR amendment. The Ministry considers it low risk that the BCUC would assign the incremental costs exclusively to one or more NIA customers, given that this would contradict the intent of the GGRR amendment.

*What is the process and timeline for a potential GGRR amendment?*

The Ministry is interested in consulting Indigenous nations and civic governments with NIA communities on the proposed GGRR amendment. Following this consultation, the Ministry will consider whether to proceed with recommending the GGRR amendment to Cabinet for consideration.

If the GGRR amendment is supported by those consulted, the Ministry would prepare drafting instructions for legislative counsel. Legislative counsel would prepare draft text for the GGRR amendment and Ministry staff would submit this text along with additional information for Cabinet review in Spring 2024.

*What kind of input is the Ministry currently seeking?*

The Ministry is currently seeking input on the following aspects of the GGRR amendment:

- A. The use of the GGRR as a regulatory tool;
- B. The definition of Indigenous-owned renewable energy projects;
- C. The types of renewable energy projects covered by the amendment;
- D. The proposed time-limit of December 31, 2029, for the signing of EPAs that would be covered by the amendment; and
- E. Principles for the development of a total expenditure limit.

## Request for feedback

The Ministry requests feedback on the proposed amendment to the GGRR. Verbal and written feedback is welcome, as are comments on the consultation process. The Ministry requests that responses to this proposal be submitted by **November 30, 2023**.

The Ministry intends to host virtual information sessions:

Tuesday, **October 17, 2023** – 2:00pm – 4:00pm

Tuesday, **October 24, 2023** – 10:00am – 12:00pm

Further details will be shared on the [Ministry's website](#)<sup>6</sup> and emailed directly to invited Indigenous nations, Indigenous organizations, and civic governments.

Additional information about the consultation process can be found in the Ministry's [Draft Engagement Plan](#)<sup>7</sup> and by contacting the Community Clean Energy Branch as follows:

[communitycleanenergy@gov.bc.ca](mailto:communitycleanenergy@gov.bc.ca)

Community Clean Energy Branch  
B.C. Ministry of Energy, Mines and  
Low-Carbon Innovation  
P.O. Box 9314 Stn Prov Govt  
Victoria, B.C. V8W 9N1

## Capacity funding

First Nations may be eligible for capacity support through the [Declaration Act Engagement Fund](#)<sup>8</sup> (DAEF) to support participation in this engagement. There is currently no funding available to support the participation of Indigenous organizations or civic governments.

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<sup>6</sup> <https://www2.gov.bc.ca/gov/content/industry/electricity-alternative-energy/community-energy-solutions/remote-community-energy-strategy-rces#:~:text=The%20CleanBC%20Remote%20Community%20Energy,80%20per%20cent%20by%202030>.

<sup>7</sup> [https://www2.gov.bc.ca/assets/gov/farming-natural-resources-and-industry/electricity-alternative-energy/community-energy-solutions/draft\\_engagement\\_plan\\_on\\_proposed\\_amendment\\_to\\_ggrr\\_09142023.pdf](https://www2.gov.bc.ca/assets/gov/farming-natural-resources-and-industry/electricity-alternative-energy/community-energy-solutions/draft_engagement_plan_on_proposed_amendment_to_ggrr_09142023.pdf)

<sup>8</sup> <https://newrelationshiptrust.ca/apply-for-funding/declaration-act-engagement-fund-daef-2/declaration-act-engagement-fund-daef/>

# DRAFT ENGAGEMENT PLAN

Proposed amendment to the Greenhouse Gas Reduction (Clean Energy) Regulation to advance renewable energy projects that displace diesel use in BC Hydro Non-Integrated Areas

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September 28, 2023

## Initiative Overview

The CleanBC Remote Community Energy Strategy (RCES) is a multi-stakeholder initiative led by the Ministry of Energy, Mines and Low-Carbon Innovation (EMLI) to reduce the use of fossil diesel fuel for electricity generation and heating in remote communities by 80% by 2030.

In 2021, the Ministry invited representatives from seven remote Indigenous nations to form the RCES Working Group and advise the Ministry on the development of the strategy. In June 2022, the RCES Working Group submitted [a recommendations report](#) to the Ministry highlighting the need for regulatory interventions to support renewable energy projects in remote communities served by BC Hydro, also known as Non-Integrated Areas (NIAs).

In March 2023, the Ministry partnered with BC Hydro to conduct early engagement with remote Indigenous nations on the development of regulatory measures to support the advancement of renewable energy projects in NIAs. Representatives from NIAs were invited to (1) comment on the Ministry's characterization of issues associated with renewable energy development in NIAs, (2) identify questions regarding existing regulatory tools, and (3) inform the parameters for potential regulatory amendments.

In April 2023, the Ministry circulated a draft summary report of the virtual sessions and written responses to check for corrections. Based on feedback from the early engagement process, Ministry staff then prepared a decision note for Minister Josie Osborne recommending that Government initiate a process to amend existing regulations to support renewable energy projects in NIAs.

In August 2023, the Minister directed staff to:

Consult with impacted Indigenous Nations and civic governments and bring forward for Cabinet consideration a Greenhouse Gas Reduction (Clean Energy) Regulation amendment which would require the British Columbia Utilities Commission to allow BC Hydro to recover the costs from ratepayers of Energy Purchase Agreements (EPAs) for Indigenous-owned renewable energy projects in NIAs signed before December 31, 2029, up to a prescribed total expenditure limit.

The Ministry now wishes to engage Indigenous nations on the proposed amendment to the GGRR. The following draft engagement plan outlines the engagement process with respect to the amendment.<sup>9</sup> The Ministry may consider additional regulatory changes to support renewable energy projects in NIAs in the future. Any future amendments would include separate engagement processes.

## Objectives

The purpose of the proposed engagement process is to inform interested Indigenous nations and civic communities about the GGRR's potential role in advancing renewable energy projects in NIAs and to collect input on its application. The objectives for the engagement process are separated into two phases.

In Phase 1, the Ministry is interested in understanding the views and concerns of Rights and Title Holders, Indigenous organizations, and civic governments with regards to:

- A) The use of the GGRR as a regulatory tool;
- B) The definition of Indigenous-owned renewable energy projects;
- C) The types of renewable energy projects covered by the amendment;
- D) The proposed time-limit of December 31, 2029, for the signing of EPAs that would be covered by the amendment; and
- E) Principles for the development of a total expenditure limit.

Input on these topics, as well as other emergent topics identified through the engagement process, will first be used to assess whether to proceed with a GGRR amendment. If a GGRR amendment is supported by those engaged, the Ministry will initiate Phase 2 of the engagement process.

In Phase 2, the Ministry would share additional information about the proposed amendment based on input from Phase 1, such as the total expenditure limit for Indigenous-owned renewable energy projects in NIAs. More information on the process is described under "Engagement Methods" below.

## Limitations

The GGRR amendment is designed to be a short-term solution to address uncertainty of EPA approval for known renewable energy projects in NIA communities. It is not intended as a substitute for broader, long-term regulatory changes that may be required to address other policy issues associated with diesel reduction in NIAs.

In the future, legislative amendments could also be proposed that would enable decision-making by the BCUC that balances ratepayer impacts with climate, reconciliation, and other objectives. Such amendments would need to consider implications for utilities and ratepayers across the Province and are considered out of scope for the current proposal.

## Engagement Groups

The Ministry plans to invite the following groups to engage:

- Indigenous nations with NIAs in their territory;

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<sup>9</sup> The GGRR is a Cabinet-approved regulation made under the authority of the *Clean Energy Act*. The GGRR lists various classes of projects that reduce greenhouse gas emissions in British Columbia

- Neighboring Indigenous nations who share territory with NIA communities or projects;
- Indigenous organizations with an interest in the topic; and
- Civic communities that are located within NIAs.

The Ministry expects that Indigenous nations with NIA communities will have a significant interest in the process. As a treaty partner, the Ministry also wishes to ensure that all Maa-nulth First Nations have the opportunity to share their views. The Ministry is available to engage with modern treaty nations separately from other Indigenous nations.

### Preliminary Identification of Impacts

The Ministry is conducting a preliminary impact assessment on the proposed GGRR amendment to understand any potential adverse impacts. The preliminary impact assessment will examine alignment with treaties, existing legislation, and the Ministry's reconciliation mandates. It will review which groups may experience potential governance, economic, environmental, socio-cultural, and health impacts. The impact assessment will be updated with information gathered during the engagement process.

Broadly conceived, the proposed GGRR amendment is a response to the interests expressed by RCES Working Group members, in alignment with the Ministry's commitments towards Indigenous peoples and action on climate change. It aims to support Indigenous nations with NIA communities by advancing the approval of EPAs for Indigenous-led renewable energy projects.

### Engagement Principles

Recognizing that engagement fatigue is prevalent amongst Indigenous nations generally, but especially among those with NIA communities, the Ministry is committed to:

- Engaging Rights and Title Holders and others over an extended timeframe;
- Being available to answer questions, collect feedback, and schedule ad hoc meetings;
- Providing multiple avenues for the provision of feedback including verbal and written;
- Providing materials in advance of engagement opportunities in accessible formats; and
- Adjusting the process wherever possible to accommodate the needs of Indigenous nations.

### Engagement Methods

The Ministry proposes an engagement process with two phases. In Phase 1, the Ministry plans to release an intentions paper to provide Indigenous nations, Indigenous organizations, and civic communities with an opportunity to familiarize themselves with the details of the proposed GGRR amendment. The Ministry will post the intentions paper on the [Ministry website](#) and send electronic copies to each invited nation, organization, and civic government by email.

Following the release of the intentions paper, the Ministry will host at least two information sessions to discuss the proposed GGRR amendment. The Ministry will update the supporting material for the intentions paper based on the questions received during the information session, via email, and other discussions. Supporting material may include a Frequently Asked Questions document.

**The information sessions are intended to clarify the proposed GGRR amendment, but they are not the only opportunity to provide the Ministry with feedback. The Ministry encourages Indigenous nations,**

**civic governments, and/or groups formed by these participants to write to the Ministry and schedule meetings with Ministry staff as needed.**

At the end of Phase 1, the Ministry will issue a summary report to all those who participated in the engagement. The report will also be available on the [Ministry’s website](#). The Ministry will then consider whether to proceed with the proposed GRR amendment.

If a GRR amendment is supported by those consulted, the Ministry will initiate Phase 2 of the engagement process. Phase 2 would begin with the preparation of a draft regulatory text by the Ministry’s legislative counsel, including a consultation draft for review.

Throughout the engagement process, Ministry staff will be available to meet online with representatives from Indigenous nations, organizations, and civic communities. The Ministry will also accept written responses at the following addresses:

[communitycleanenergy@gov.bc.ca](mailto:communitycleanenergy@gov.bc.ca)

Community Clean Energy Branch  
 B.C. Ministry of Energy, Mines and  
 Low-Carbon Innovation  
 P.O. Box 9314 Stn Prov Govt  
 Victoria, B.C. V8W 9N1

### Timeline

The following timeline presents tentative dates for the engagement process. It is subject to change based on feedback from those participating in the process.

	<b>Milestone</b>	<b>Target Date</b>
Phase 1	Draft Engagement Plan Review	Ongoing
	Release Intentions Paper	September 18, 2023
	Information Sessions	Tuesday, October 17, 2023 2:00pm – 4:00pm
		Tuesday, October 24, 2023 10:00am – 12:00pm
	Frequently Asked Questions Document	November 2023
	Deadline for Submitting Input on Phase 1	November 30, 2023
	Summary Report of Engagement Outcomes	December 2023
*Decision whether to proceed with proposed GRR amendment*		
Phase 2	Update on Proposed Amendment	Winter 2024
	Cabinet Review	Spring 2024

## Intended Outputs

EMLI will be drafting several documents over the course of the engagement process, which will include:

- Impact Assessment
- Engagement Plan
- Invitation List
- Letter of Invitation
- Intentions Paper
- Information Session Presentation
- Supplementary Material (e.g. Frequently Asked Questions)
- Issues Management Record
- Engagement Summary Report
- Consultation Draft of Regulatory Text

## Participant Funding

Funding is available to First Nations through the [Declaration Act Engagement Fund \(DAEF\)](#) administered by the New Relationship Trust. The DAEF provides non-repayable funding contributions to First Nations to support their capacity to engage with the Province of B.C. There is currently no funding to support the participation of other Indigenous organizations, or of civic communities.

## Roles and Responsibilities

EMLI is responsible for drafting engagement material, sending out invitations, responding to requests for information, hosting meetings, organizing online information sessions, and publishing summary reports. EMLI does not currently have the funds to hire an external facilitator for these tasks.

BC Hydro is not a formal partner in this engagement process. However, BC Hydro is responsible for providing information to EMLI to assist in engagement sessions.

New Relationship Trust is responsible for administering funding to support the participation of First Nations in the engagement process.

NIA First Nations Working Group is reviewing and providing feedback on Ministry documents throughout the engagement process.



## Appendix C – Invitation Letter

# Invitation Letter

Dear [Chief and Council],

On behalf of the BC Community Clean Energy Branch, I am writing to invite you to participate in an engagement process organized by the Ministry of Energy, Mines, and Low-Carbon Innovation.

The Ministry is seeking feedback on a proposed amendment to the Greenhouse Gas Reduction (Clean Energy) Regulation (GGRR).

The proposed amendment would support the development of renewable energy projects in remote communities served by BC Hydro, known as Non-Integrated Areas (NIAs). The Ministry is seeking input from Rights and Title Holders, Indigenous organizations, and civic governments on the proposed amendment.

I have attached a formal letter of invitation along with three additional documents:

- An intentions paper describing the proposed GGRR amendment;
- A draft engagement plan describing the Ministry's engagement process; and
- A summary of virtual engagements with Indigenous nations in NIAs from March 2023.

The Ministry intends to hold information sessions regarding the proposed amendment:

- Tuesday, **October 17, 2023** – 2:00pm – 4:00pm
- Tuesday, **October 24, 2023** – 10:00am – 12:00pm

Further details regarding the information sessions will be available from the [Community Clean Energy Branch website](#) and sent directly to invited participants.

Verbal and/or written feedback is requested by **November 30, 2023**. Comments may be submitted to:

[communitycleanenergy@gov.bc.ca](mailto:communitycleanenergy@gov.bc.ca)

Community Clean Energy Branch  
B.C. Ministry of Energy, Mines and Low-Carbon Innovation  
P.O. Box 9314 Stn Prov Govt  
Victoria, B.C. V8W 9N1

I appreciate your attention during the busy fall season and thank you for considering this invitation. I look forward to your response.

Sincerely,

Sean LeRoy  
Acting Executive Director, Built Environment  
Energy Decarbonization Division  
B.C. Ministry of Energy, Mines and Low-Carbon Innovation

## Frequently Asked Questions (FAQs)

Proposed amendment to the Greenhouse Gas Reduction (Clean Energy) Regulation to advance renewable energy projects that displace diesel use in BC Hydro Non-Integrated Areas

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### **Which projects would the proposed amendment apply to?**

The proposed GGRR amendment would apply to renewable energy projects in Non-Integrated Areas (NIAs) with Energy Purchase Agreements (EPAs) that are signed between the date the amendment comes into effect (estimated in Spring 2024) and December 31, 2029. It would not prompt the renegotiation of existing EPAs.

### **How does this amendment relate to purchase prices for renewable electricity?**

The proposed amendment is meant to provide more certainty regarding project acceptance by the British Columbia Utilities Commission (BCUC). Without regulatory support, the BCUC may not be prepared to accept EPAs for renewable energy projects in NIAs that cost more than BC Hydro's avoided cost of diesel. If adopted, the proposed amendment would apply to all eligible projects, up to a total expenditure limit, regardless of individual purchase prices negotiated with BC Hydro.

### **How does this amendment affect diesel reduction targets?**

The proposed amendment is designed to help the Province meet its goal to reduce fossil diesel fuel for electricity generation and heating in remote communities by 80% by 2030. The proposed amendment would not set any additional targets.

### **Why has a deadline of December 31, 2029, been selected?**

The proposed 5-year timeframe aligns with the Province's 2030 diesel reduction target. It is designed to provide regulatory support to renewable energy projects that are in advanced stages of development. It may also provide momentum to accelerate newer projects. The Ministry will continue to evaluate progress towards the 2030 diesel reduction target and the need for additional regulatory support.

### **Will the Ministry make legislative changes to support renewable energy projects in NIAs?**

The Ministry is aware that legislative change is a priority for many Indigenous nations with remote communities and is committed to further exploration with the CleanBC Remote Community Energy Strategy Working Group and the First Nations Non-Integrated Area Working

Group. These discussions will happen alongside other Ministry processes such as the Indigenous Clean Energy Opportunity (ICEO) process and the BC Hydro Task Force.

### **What costs would this amendment enable BC Hydro to recover?**

The proposed amendment would enable BC Hydro to recover the costs of EPAs for new renewable energy projects from ratepayers. The Ministry has not yet determined whether additional costs should be proposed for inclusion in the amendment, such as infrastructure expenditures and costs related to operations and maintenance.

### **How will the expenditure limit be decided?**

The Ministry has gathered information on projects that are in advanced stages of development and could secure EPAs before December 31, 2029. These projects provide a foundation for establishing an expenditure limit. However, the Ministry has not yet determined the principles for calculating the costs of these projects and welcomes feedback on these principles.

To date, the Ministry has heard that the expenditure limit should be large enough to encompass all the expected projects and maybe more, to ensure that projects do not have to compete with one another, and that later projects are not disadvantaged.

The Ministry is aware of questions around the treatment of government grant funding within EPA negotiations and Ministry staff are investigating further. Comments about BC Hydro's commercial strategy can be directed to BC Hydro via their engagement process on the [NIA Community Renewable Energy Offer](#).

### **Will the expenditure limit be a specified dollar value, or will it be calculated based on a formula that considers the avoided cost of diesel?**

The Ministry does not plan to include a formula for calculating the avoided cost of diesel as part of the expenditure limit. The Ministry is looking for ways to streamline the decision-making process to advance the acceptance of EPAs and believes that specifying an overall dollar value within the GGRR amendment is the simplest way of implementing an expenditure limit. Providing a formula for calculating the expenditure limit may introduce more uncertainty and slow the decision-making process. As noted earlier, the Ministry welcomes feedback on principles for establishing an expenditure limit.

### **What happens after this initial round of engagement?**

Based on feedback from Phase 1, Ministry staff will seek a decision from the Minister about whether to proceed with the proposed amendment. If the Ministry proceeds, Phase 2 of the engagement will include an update on the total expenditure limit and further opportunities to provide feedback.

## Appendix E – Information Session Notes

### Virtual Information Session One, October 17, 2:00pm-4:00pm

Questions during the presentation are provided below. [Questions were not received in the online chat.](#)

NIA – asked to repeat if communities that retain diesel backup are included or not.

EMLI – the amendment will support communities that are diesel dependent and are building or expanding renewable energy generation, replacing diesel as the primary energy source. Those communities may keep diesel as back-up. This amendment is about providing certainty that EPAs will go forward in those communities; allows more certainty so BCUC will approve their EPAs and projects can move to construction.

NIA – Toad River, a small community on the Alaska Hwy, is diesel dependent and BC Hydro operates the diesel generator – is the community eligible?

EMLI & BCH – Yes

EMLI – I want to note that Toad River is the first non-indigenous community to apply to CEDR. We are very excited to see where Toad River goes.

NIA – Thank you

NIA – Thanks for the presentation, it was very informative. You mentioned how there was a low risk of an increase in the cost to ratepayers impacting just remote communities. Please elaborate on “low risk.” Why can’t there be no risk to remote communities? How can these higher costs NOT fall back on communities?

EMLI – Low risk means that our intent is that this amendment does not solely impact the cost to remote community ratepayers. We don’t think utilities will go against this intent. The reason this isn’t “no risk” is because in the March engagement session, attendees wanted BCUC to retain their role for oversight.

EMLI – We can review other options if we find that BCUC determines that the cost to ratepayers will only be paid by remote communities.

NIA – I am not clear on what are we doing to fundamentally shift the EPA process. Is this amendment only happening to make sure that the impact to ratepayer doesn’t just affect remote communities? Can you show us a slide of an example to help understand the intent of the GGRR amendment proposal.

EMLI – We are concerned that BCUC won’t approve EPAs in remote communities. This amendment will make sure that the EPAs will be approved. If BCUC wanted to charge costs back to NIAs only, we would look at other options.

NIA – Can you show us a slide of an example to help understand the intent of the GGRR amendment proposal. Can you provide an example?

EMLI – That is a good idea – we can look into that.

NIA – You said that there are 44 remote communities. Is there a way we can see that list?

EMLI – We can follow up with a list (map shown on screen).

NIA – Based on the [participant’s] question, are we redefining what is in the public interest? i.e. The price will be higher, but reducing GHG is in the public interest. Rejigging what is viewed as what is in the public’s interest?

EMLI –The goal of this amendment is to define a class of projects that are in the public interest because they result in GHG reductions.

NIA – I want to understand a little better how this amendment will change the nature of BC Hydro’s relationship with remote communities. Will BC Hydro or BCUC be determining how the impact on the cost of ratepayers will be reallocated? [The BCUC will determine how ratepayer impacts are allocated.]

BCH – Re: how does this change the nature of negotiations of EPA? I don’t think it will, but it will change the way we go about EPAs. We don’t normally take EPA that we don’t think will make it to BCUC. This amendment will help us because we know that the first few projects/EPAs would go ahead and get approved but as more clean energy projects happen, the next projects/EPA would be more challenging financially to get approved. This amendment would help level the playing field.

NIA – So just to clarify on rate recovery, BCUC will be the ones to decide? BC Hydro doesn’t determine how the rates are recovered? Please explain.

EMLI – The *Utilities Commission Act (UCA)* tells us what powers are assigned. Typically, BC Hydro costs are allocated across all clients, industrial, residential, and commercial.

NIA – In the public interest, what other factors will this regulatory tool bring? Valuing GHG attribution/admissions? Are environmental, social, and public benefits being expanded?

EMLI – There currently is no direction from the Minister to change factors. EPAs will be considered by these factors “Indigenous owned, in an NIA, EPA signed before December 31, 2029, and within the prescribed total expenditure limit”. [An EPA needs to be signed before Dec 2029, but the project doesn’t need to be complete.] We’re plugging into an existing regulatory tool with new criteria. We can set what the principles can be for the expenditure limit though. The offer of one-to-one engagement extends to you too if you want to discuss it more.

NIA – Thank you, I will have more questions.

EMLI – I would like to express my gratitude to the NIA working group for their support and help. They are a busy group of people who gave excellent input. All the input we have received so far is much appreciated. Thank you everyone for joining. Everyone is welcome to join the next meeting. The information presented will be the same, but we might update the slides based on feedback received today.

## Virtual Information Session Two, October 24, 10:00am-12:00 pm

Questions during the presentation are presented below in black. Questions received in the online chat are presented in blue.

**NIA – What is the process for decision at end of phase 2, who decides? How does EMLI feel about the 80% target in absence of BC Hydro setting a target for the NIAs?**

EMLI – We will take the feedback from engagement back to Minister Josie Osborne; the Minister will decide. The province views the 80% target as a collective target, not based on individual targets for each community.

NIA – BC Hydro has not announced their target yet (they say it's to be determined). Has that changed? Does the Province think these targets are achievable seeing that BC Hydro doesn't have a target?

EMLI – We're doing research on where we're at and how far we still need to go to reach the 80% by 2030. Research includes what resources are available in each remote community to get us to the 80% target. Work is underway right now.

NIA – Does BC Hydro have any comment?

BCH – We are currently engaging on our strategy. Part of that will include setting our target. BC Hydro is developing performance metrics and targets and supporting studies that will inform their target.

NIA – I support the previous comment. It is important that BC Hydro has a target.

**NIA – Was the Oct 17th well attended? Because this does not have much attendance. Can we ensure the metrics on engagement are included in the report?**

EMLI – Yes, we can include that in the report.

EMLI – We can share those numbers in the summary report. We are meeting with nations one-on-one as requested. The virtual information sessions are only one opportunity to engage.

**NIA – The FN NIA engagement with BC Hydro started in March. It is the end of October. The KEY point in the NIA Diesel Reduction Strategy is the diesel reduction targets. This should have been completed, or drafted for review, months ago. WHEN will we have them?**

**NIA – Yes, what is BC Hydro's timeline for identifying a target and engaging with FN for feedback on that target as part of the LTRP? That would be helpful thanks**

**NIA – You say 'many' projects will be above the avoided cost of diesel. How many are CURRENTLY being developed that are above the avoided cost of diesel?**

EMLI – I can't give an exact number but the projects we intend to support are all current projects on the table that will be keeping diesel as a backup and that expect to have EPAs in the next 5 years.

NIA – On cost the of diesel question, you need to get a sense of the cost of diesel in your community; it's an important metric. This will tell you if your project will be viable. Key things that are helpful to know – what is the time horizon when we're comparing clean energy to diesel? Everyone should have the same one. Can we include externalities like cost of carbon, cost of fuel spills? What are our base assumptions of the beginning cost of fuel and how these will escalate over time? Scaling of operational costs so renewable energy projects more than balances these out? Standardized guidance that everyone uses?

NIA – It would be helpful for project proponents or even communities just starting to know what the current cost of diesel in their community is. Would it be possible to help communities by estimating the cost of diesel, including the time horizon used and which other factors are considered? What are the other assumptions involved (like inflation and rising cost of diesel)? Also is there an estimated time of when the amount of renewable energy projects offset the cost of maintaining or administering diesel stations? It would be important to have standardized guidance on how to calculate the cost so that everyone is on the same page.

BCH – There are a broad range of costs. Happy to talk about ways to estimate these. Recommend directing questions to one of the BC Hydro engagement sessions.

NIA – Back in the day [First Nations] had an EPA with BC Hydro that factored the avoided cost of diesel. I am concerned that EPAs now won't include that and won't include the return of the cost of investment, that this amendment will benchmark a price that will no longer be in the community. There's a range of return on investment (ROI). BC Hydro said you can never get an ROI. 10% ROIs is what regular utilities get. This would be well above the avoided cost of diesel; ROI would be more aligned in reconciliation. BC Hydro's position is that we can only give you the avoided cost of diesel.

You say "many" projects will be above the avoided cost of diesel. How many are CURRENTLY being developed that are above the avoided cost of diesel?

NIA – BC Hydro won't pay avoided cost of diesel now so what makes it a concern is they will be paying above that identified cost later?

NIA – Since I am new, is there a location or source for these plans being referenced? (EMLI referred NIA to the Intentions Paper)

NIA – Is there a definition on what costs in this proposed amendment that BC Hydro can recover? Is it only costs for the electricity purchased?

NIA – In agreement with comments made, and in review of the proposed approach currently on screen, what policies and mandates will EMLI be developing in conjunction with reg change? Can these draft policies and mandates be circulated to FN in conjunction with this reg change? If EMLI does not have plans for this adjoining work can you please clarify why?

NIA – Can we clarify [participant's] questions, sorry I did not catch everything, the re-coup will only go "up to" the avoided cost of diesel? Is that accurate EMLI?

EMLI – We will be issuing a report on the Remote Community Energy Strategy (RCES) early in the new year with an update on the RCES action plan. There are many policies and plans that EMLI is working on, not all of them related directly to the GGRR amendment, but important nonetheless, e.g., streamlining funding.

NIA – Which ones are "directly related" that you are working on, those should be presented here along with the reg change and along with timelines?

EMLI – This is the major policy piece that we are working on at the moment. Happy to schedule a conversation following this session if you have further questions.

NIA – The price of diesel is averaged by BC Hydro. They (used to) look at the past 20 years, if I'm not mistaken. Even the past five years skews the numbers lower. The amendment should include a reasonable formula for determining a price of diesel.

NIA – I want to talk about transparency so that everyone understands the proper pricing. And the avoided cost of diesel. A lot of communities do not know what that is. Especially if BC Hydro is the sole proprietor. I also think that engagement needs more attendance to be meaningful. If we're talking about regulatory change, we need better attendance. What is "meaningful engagement" and how do we report back? How many Indigenous representatives? How many local governments? I would like to see it reflected in the report back.

EMLI – We'll be collating the number of attendees plus the one-on-one sessions.

EMLI – We haven't landed yet on which costs will be included in the undertaking. We believe the cost of the EPA would form part of it, plus potentially other costs a First Nation or BC Hydro incurs to enable the project to proceed. The purpose of the GRRR amendment is to ensure these projects are built so that full and complete projects go ahead.

NIA – Broad is not what is needed. We want specific information. We would like more specific answers to our questions in order to fill in the gap.

NIA – What cost could BC Hydro recoup through this regulatory amendment?

EMLI – the amendment helps make sure the BC Hydro recoups cost. The cost to the First Nation is not specifically included.

NIA – I have a question about total expenditure limit, will this include economic reconciliation? If we're looking at cost of displacing diesel, I'm looking at economic reconciliation for long-term, and stable. Let's start talking about total expenditure limit.

EMLI – Let's talk more about the total expenditure limit (back to the presentation).

NIA – will the presentation and FAQ be online and mailed out to nations?

EMLI – Yes, we'll make the presentation and FAQ available by email and on our website.

This is the current website where the documents will be posted [Current Engagement - Province of British Columbia \(gov.bc.ca\)](https://www2.gov.bc.ca)

NIA – About the expenditure limit and equity, what about creating minimum expenditure allowance per community so all communities can access? Incentivize earlier projects so they act quickly. I have concerns about the time limit – I know that the initial batch of projects are important, but my concern is that they will still have further actions required. The final 20% diesel reduction will be the most expensive so there needs to be more incentives to get to 100% as the final target. The last projects will be more expensive but really important if we want to get 100% reduction. The time limit might not support those projects. As for the total expenditure amount, it will depend on what EPA prices are achievable.



NIA – I have a comment on the expenditure limit and ensuring equity between communities. I think it should be separated into two parts. The first part should be for BC Hydro to recoup the avoided cost of diesel. I do not want it framed as total recoverable costs. And the second part should be for everything else. One total cost will be big.

RCES WG asked for an Indigenous Energy Act – is that coming? In terms of if this is the right regulatory measure to use? GGRR. Other options that might be better, it feels like Indigenous projects have been shoe-horned into this regulatory tool. In terms of the incentive, the community will be the most penalized. Penalties shouldn't go to the communities. Why can't BC Hydro be penalized instead? Also, you cannot pit nations against each other for the expenditure limit or for funding. Make a base/floor amount for the EPA price.

EMLI – EMLI is on the same page; we don't want to pit nations against each other. Equitable access is important. Are there any other principles we should consider?

NIA – Another question, where are we with the [partnership] agreement?

EMLI – We would have to check with the Low Carbon Fuels team, but implementation of the *Low Carbon Fuels Act* is taking longer than expected. We can send out a timeline for that. I know you want us to do something broader. What we are doing now with this amendment is trying to move forward as quickly as we can to honour the current projects in development.

NIA – I just want to know that at least someone is working on the bigger legislative change.

NIA – Very supportive of the previous comment on breaking expenditure into avoided cost of diesel vs additional amount.

NIA – How could the expenditure limit be determined if BC Hydro has not published the cost of diesel across the NIAs?

NIA – ... Good discussion and look forward to the next meeting, I would like to see more. Given the climate of issues today and the proposed regulation worries me about what's coming - election, federal direction, and environment protection measures.

NIA – For the intention paper, we need more baseline information. For me the main one is what is the avoided cost of diesel? Also, other projects in the province that get subsidized don't get discredited, Nations also shouldn't. What baseline should we use to ensure First Nations are not being exploited? We don't want to be penalized for wanting to displace 100%. How can this be equitable. First Nations shouldn't have to take that brunt when we're working hard towards energy sovereignty. If a Nation wants to pursue 100% energy autonomy, we should be able to, not the 80% max set by BC Hydro.

NIA – On the economic development side, why can't we expand the grid? Microgrids limit the amount of energy a community can use. It constrains growth, and caps output and ability to grow without getting the grid in there. If disconnected, communities can't sell energy to the grid.

NIA – [Name] brings up valid point. I have concerns around question 4 and time limit, I don't know if it's a wise date to pick. We are handcuffed, it's hard to expand our community. We don't want to be in a position where we run out of time. We don't want to limit our future growth.

EMLI– what do you think would be a good time period or are you suggesting no time period?

NIA – It's just that it's only 6 years. We are heavily reliant on diesel, there's a lot of work to do.

EMLI – We will make note of that.

NIA – In terms of economic development and energy reliability, I want to make sure that EMLI is looking at these as linked and how there could be doors that are open or closed based on what policy decisions are made. We don't want to limit communities by only looking at current needs. We should also be looking at the increasing energy demand based on future economic development. Hopefully EMLI is thinking about this for their future strategies.

NIA – Last week I asked if negotiations between BC Hydro and Nations will be impacted, and I was told that they would not necessarily change. The amendment would remove a primary barrier that an EPA would not be accepted by BCUC. Now, I'm hearing about these current concerns on EPA negotiation, significant concerns about negotiations between BC Hydro and communities. Is this the right regulatory tool? Because this amendment will limit BCUC power, but BC H Hydro will still have the goal of economic efficiency and is mandated to get the lowest EPA rate they can get away with. How is this tool levelling the playing field for negotiations?

NIA – If a study is being done, will Nations be questioned and part of the process?

EMLI – We can include more details of the research in the follow-up FAQ document.

BCH – What you've said is correct. BC Hydro is a purchaser of electricity. That is our role, we are mandated. I can't comment on your question since that is more about regulatory measures.

BCH – Regarding the chat, yes, we're doing studies and are looking forward to our long-term resource planning framework that we want to be collaborative with Nations. Want a pathway to 100% clean energy. Feedback from Nations is included in the research.

EMLI – In looking at the amendment, this also puts pressure on EMLI and BC Hydro. For BC Hydro, it's to sign EPAs quickly. For EMLI, it puts pressure on us to keep working on other policy and regulation amendments that need to be done.

NIA – [directed to BC Hydro] Who is running that research?

BCH – The Pembina Institute is working on it.

NIA – What will happen to current EPAs? Will they not be renegotiated because EMLI isn't directing BC Hydro to do that?

EMLI – It won't force the renegotiation of EPAs.

EMLI – But it could apply to a renegotiation potentially.

NIA – I don't think there is any EPA that is less than the avoided cost of diesel. But I know that BC Hydro won't be interested in renegotiating EPAs.

NIA – Government should look at Ministry of Forests and make specific permitting legislative changes for First Nations community clean energy projects

NIA – Pembina is leading an assessment of diesel reduction projects in Independent communities, which to my best understanding is one phase of three in the research. Communication has gone out to independent communities with diesel reducing projects. I would be happy to speak more on this research if anyone has questions.

EMLI – Phase one is research with remote communities that independently own and operate their micro-grids (not NIAs)

EMLI – Time for last comments.

NIA – Happy that we are starting on this path.

NIA – I think this is the only engagement on this. I'm hopeful that one day these projects that are not owned by Nations but are on Nation land will be required to involve Nations.

EMLI– Happy to discuss your questions about the connection to the grid offline.

NIA – Very supportive of a minimum expenditure amount per community. For the max expenditure, it should include more factors than just the avoided cost of diesel. We should also try for 100% diesel displacement, we have time, money, people.

NIA – The devil is in the details, looking forward to getting in to. Also looking forward to the engagement for legislative changes.

NIA – I hope to see this as a start to a broader suite of actions.

## Appendix F – Invitation List

<b>NIA First Nation or Organization</b>
Dease River First Nation
Gitga'at First Nation
Council of the Haida Nation
HaiCo
Heiltsuk Nation
Kwadacha Nation
Nuxalk Nation
Old Massett Village Council
Skidegate Band Council
Tahltan Band Council
Tahltan Central Government
Taku River Tlingit First Nation
Tsay Keh Dene Nation
Uchucklesaht Tribe Government
Ulkatcho First Nation
First Nations Summit (FNS)
Union of BC Indian Chiefs (UBCIC)
BC Assembly of First Nations (BCAFN)
First Nations Leadership Council
First Nations Energy and Mining Council
<b>Neighbouring First Nations with Tsay Kay Dene</b>
Doig River First Nation
Halfway River First Nation
West Moberly First Nation
<b>Neighbouring First Nations with Gitga'at</b>
Gitxaala Nation
<b>Neighbouring First Nations with Dease River</b>
Kaska Dena Council
Liard First Nation
Liard First Nation
Ross River Dena Council
Fort Nelson First Nation
<b>Neighbouring First Nations with Dease River</b>
Kaska Dena Council
Liard First Nation
Liard First Nation
Ross River Dena Council
Fort Nelson First Nation
<b>Neighbouring First Nations with Anahim/Nimpo Lake</b>
Tsilhqot'in National Government

<b>Maa-nulth Treaty Society (Uchucklesaht)</b>
Huu-ay-aht First Nations
Ka:'yu:'k't'h'/Che:k'tles7et'h' First Nations
Toquaht Nation
Yuuʔuʔiʔath Government
<b>Regional Districts/Electoral Areas/Civic Communities</b>
Area C –Central Coast
Area D – North Coast
Area E – North Coast
Area F – Kitimat-Stikine
Area J Columbia Shuswap
Northern Rockies
Masset
Toad River
Atlin

## Appendix G – List of NIA communities

First Nation	Remote Communities
Haida	Masset, Old Masset
	Port Clements
Ulkatcho	Anahim Lake
	Nimpo Lake
Tsay Keh Dene	Tsay Keh Dene
Kwadacha	Fort Ware
Tahltan	Telegraph Creek
Gitga'at	Txalgiuw / Hartley Bay
	Toad River
Dzawada'enuxw	Ukwanalís / Kingcome Inlet
Dease River	Good Hope Lake
Xeni Gwet'in	Xeni Gwet'in
Kwikwasut'inuxw Haxwa'mis	Gwa'yas'dums / Health Bay
Lhoosk'uz Dene	Kluskus Lakes
Da'naxda'xw	Tsatsisnukwomi / New Vancouver
	Jade City
Uchucklesaht	Ehthlateese
Tlatlasikwala	Bull Harbour
Gwawaenuk	Heghums / Hopetown
Daylu Dena	Lower Post
Nuxalk	Bella Coola
	Hagensborg, Firvale
Haida	Daajing Giids
	Sandspit
	Skidegate
	Tlell
Kitasoo / Xai'xais	Klemtu
Wuikinuxv	Oweekeno / Rivers Inlet
Haíłzaqv (Heiltsuk)	Bella Bella
	Shearwater
Hesquiaht	Refuge Cove, Hot Springs Cove
Taku River Tlingit	Atlin
Tahltan	Dease Lake
Takla Lake	Takla Landing
	McBride
Tahltan	Iskut, Eddontenajon
Gitxaala	Lach Klan / Kitkatla
Ka:'yu:'k't'h' / Che:k:tles7et'h'	Houpsitas / Walter's Cove



Ministry of  
Energy, Mines and  
Low Carbon Innovation



## Regulatory Support for Renewable Energy Projects in Non-Integrated Areas

Virtual Information Sessions

October 17, 2023, 2:00pm - 4:00pm

October 24, 2023, 10:00am- 12:00pm

Presented by Ministry of Energy, Mines and Low Carbon Innovation (EMLI)  
to First Nations, Modern Treaty Nations, civic governments,  
and Indigenous organizations



Ministry of  
Energy, Mines and  
Low Carbon Innovation



### Agenda

- Welcome (10 min)
- Roundtable of Introductions (20 min)
- Presentation by EMU (30 min)
- Discussion (50 min)
- Next Steps (10 min)



## Engagement Process

- Early Engagement (March 2023)
  - Confirm policy issues and explore regulatory options
- Phase 1 (October-November 2023)
  - Solicit feedback on proposed regulatory approach
- Phase 2 (January – April 2024)
  - Submit regulatory amendment for Cabinet consideration



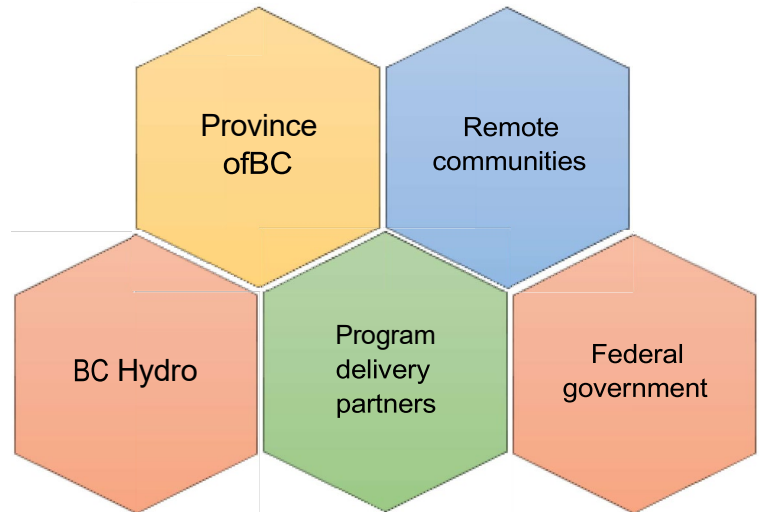
## Phase 1 of Engagement Process

- Outputs:
  - Draft Engagement Plan
  - Intentions Paper
  - **Virtual Information Sessions**
  - Frequently Asked Questions
  - Summary Report of Engagement Outcomes
- Virtual Sessions
  - Purpose: review Intentions Paper, identify and answer questions, note feedback
  - Not intended to replace one-on-one engagement



## CleanBC Remote Community Energy Strategy (RCES)

- Multi-stakeholder initiative to reduce diesel electricity generation and heating in remote communities by 80% by 2030
- Supports Indigenous economic development and reconciliation objectives



## Remote communities at-a-glance

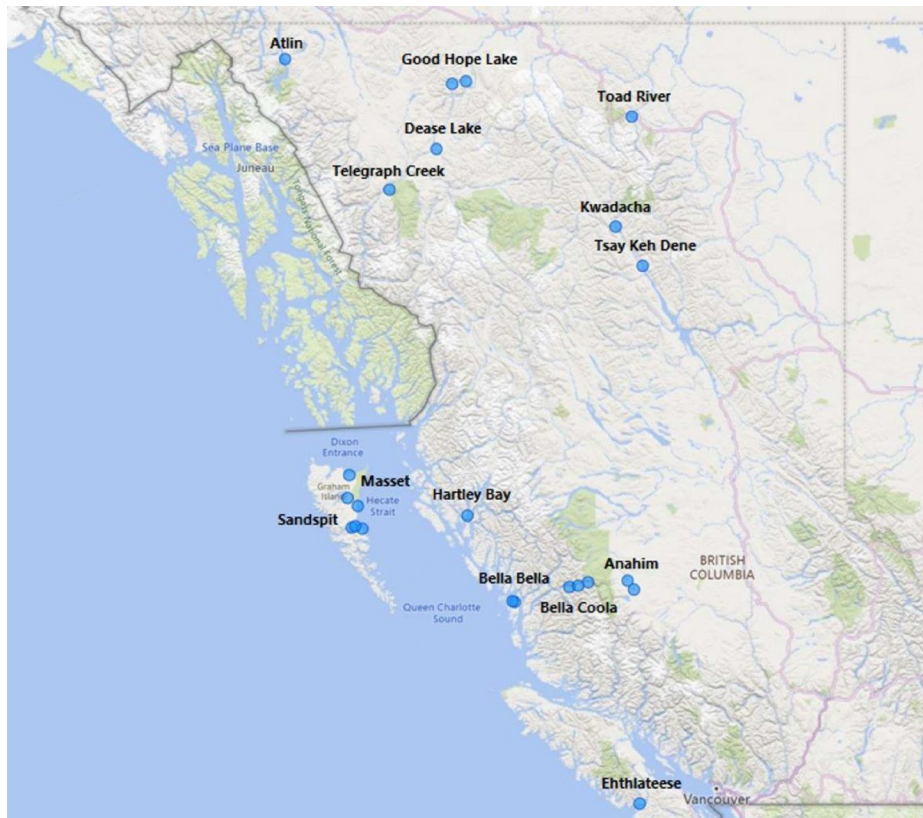
- 44 remote communities in BC
  - 29 communities served by BC Hydro
  - 10 communities with independently-owned micro-grids
  - 5 communities at the end of the transmission line with back-up diesel use
- Most remote communities are governed by Indigenous nations





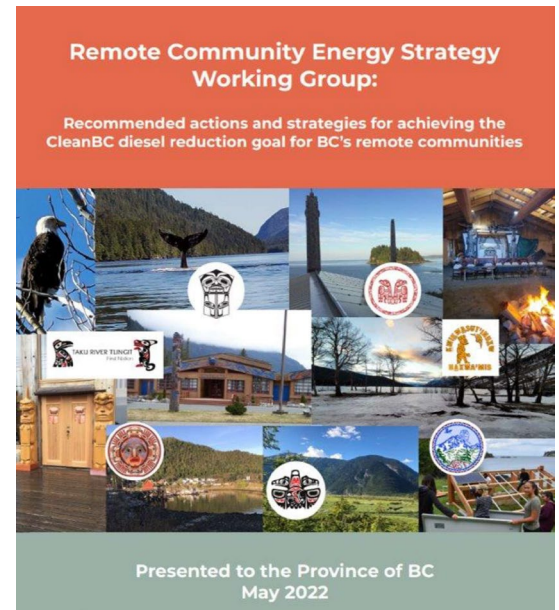
## BC Hydro Non-Integrated Areas (NIAs)

- NIAs are remote communities served by BC Hydro
- There are 14 NIAs containing 29 remote communities
- Powered by a combination of diesel and renewable energy
- Represent around 85% of provincial diesel consumption for electricity generation



## Context for Regulatory Support

- In 2021, EMLI created the RCES Working Group to inform strategy development and align with UN Declaration
- 9 members representing 7 Indigenous nations
- Recommendations report translated into RCES Action Plan
- One immediate action is to develop regulatory measures to support near-term renewable energy projects in NIA communities



## Why Regulatory Support to Increase Project Acceptance?

- Several renewable energy projects in advanced stages of development
- Each project will require an Energy Purchase Agreement (EPA) with BC Hydro
- BC Hydro must file EPAs with the British Columbia Utilities Commission (BCUC) who must consider whether the EPA is in the public interest



## Why Regulatory Support to Increase Project Acceptance?

- BCUC may not be prepared to accept the EPAs as many of them are expected to be above the cost of diesel
- If the BCUC does not accept the EPAs, these projects will not move ahead
  - Indigenous nations will not achieve their renewable energy goals
  - Province will not achieve its diesel reduction goals



## Early Engagement Process

- In March 2023, EMLI partnered with BC Hydro to organize 3 virtual engagement sessions with NIA communities
- The engagement sessions reviewed:
  - Policy issues associated with renewable energy development in NIA communities
  - Existing regulatory tools to respond to these issues
  - Parameters to guide the use of regulatory tools



## Early Engagement Results

- Participants highlighted:
  - Capacity constraints and the need for more information
  - Desire to retain BCUC oversight in EPA acceptance
- A summary report containing additional feedback is available on EMLI's website <sup>1</sup>
- Based on feedback, Minister Josie Osborne directed staff to further consult with Indigenous nations and civic governments on a proposed amendment to the **Greenhouse Gas Reduction (Clean Energy) Regulation (GGRR)**

<sup>1</sup> - <https://www2.gov.bc.ca/gov/content/industry/electricity-alternative-energy/community-energy-solutions/remote-community-energy-strategy-rces/remote-community-energy-strategy-engagement>



## Proposed Approach

The Ministry proposes to bring forward an amendment to the Greenhouse Gas Reduction (Clean Energy) Regulation (GGRR) for Cabinet consideration

This amendment would require BCUC to allow BC Hydro to recover the costs from ratepayers of EPAs for Indigenous-owned renewable energy projects in NIAs, signed before December 31, 2029, up to a prescribed total expenditure limit



## What is the GGRR and how has it been used?

- The GGRR is an existing regulatory tool that was first introduced in 2012
- Within the GGRR, Cabinet can use one or more criteria to define a class of projects, programs, contracts, or expenditures, which utilities may employ to reduce greenhouse gas (GHG) emissions
- Any activity that falls within the defined class is called a “prescribed undertaking”
- The BCUC must not prohibit the utility from carrying out a prescribed undertaking and must allow the utility to recover the associated costs through rates
- The GGRR has been amended over time for various purposes, for example, adding a prescribed undertaking for electric vehicle charging stations



## Why propose a GGRR amendment over other possible regulatory tools?

- Provides broad (vs. individual) regulatory coverage for renewable energy generation projects in NIAs
- Retains (limited) BCUC oversight in the acceptance of EPAs
- Permits flexibility, as it does not preclude the Minister from issuing future exemptions under section 22 of the *Utilities Commission Act*



## What are the key advantages of using the GGRR?

- Provides more certainty around EPA acceptance for Indigenous-led renewable energy projects in NIA communities
- More timely solution to meet diesel reduction goals than legislative changes
- Timeline could be extended if deemed necessary



## What are the limitations of using the GGRR?

- The proposed amendment is currently framed as a short-term solution
- Not intended to replace legislative amendments that could incorporate climate and reconciliation objectives into the *Utilities Commission Act*



## What is the ratepayer impact of this approach?

- The potential rate impact of the EPAs covered by the proposed amendment would depend on the established expenditure limit
- EMLI considers it low risk that the BCUC would assign the incremental costs exclusively to NIA customers

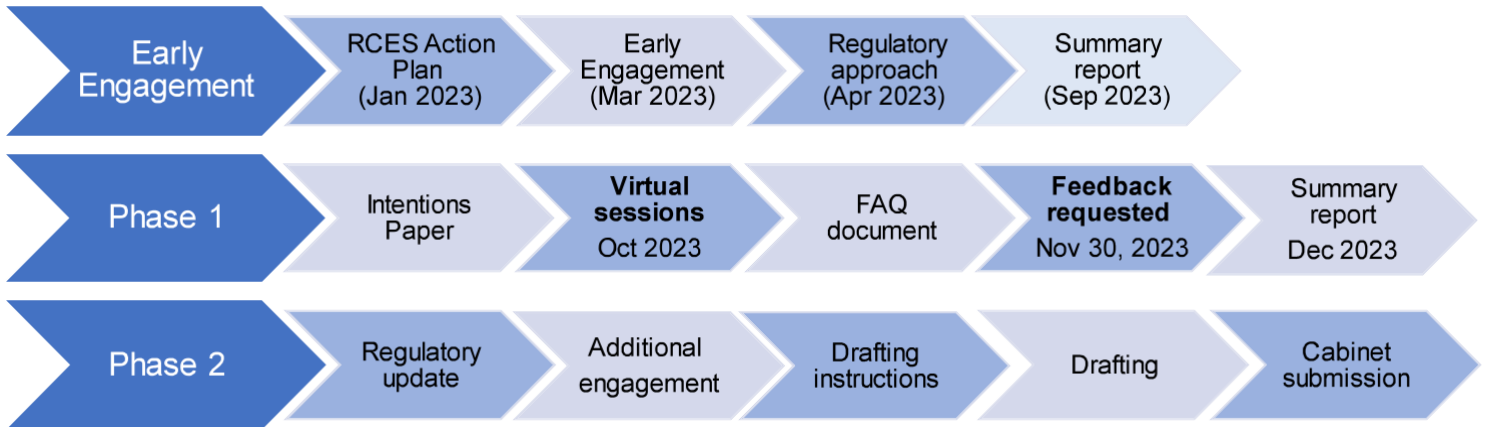


## What kind of input is EMLI currently seeking?

1. The use of the GGRR as a regulatory tool
2. The definition of Indigenous-owned renewable energy projects
3. The types of renewable energy projects covered by the amendment
4. The proposed time-limit of December 31, 2029
5. Principles for the development of a total expenditure limit



## Regulatory Engagement Timeline



### Next steps

- Feedback is requested by **November 30, 2023**
- **EMU** staff are available for individual meetings
- Written responses can be submitted to:

[communitycleanenergy@gov.bc.ca](mailto:communitycleanenergy@gov.bc.ca)

Community Clean Energy Branch  
B.C. Ministry of Energy, Mines and Low Carbon Innovation  
P.O. Box 9314 Stn Prov Govt  
Victoria, B.C. V8W 9N1



## Discussion

- Questions regarding the information presented?
- Questions regarding the engagement process?
- Feedback on the proposed amendment?



## What kind of input is EMLI currently seeking?

1. The use of the GGRR as a regulatory tool
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