

May 15th 2020

Submitted electronically @ BCHydroReview@gov.bc.ca

RE: BluEarth Renewables (“BluEarth”) response to BC Hydro Phase II Interim Report

BluEarth would like to thank the Ministry of Energy, Mines and Petroleum Resources for the opportunity to comment on the Comprehensive Review of BC Hydro – Phase II Interim Report. BluEarth is a leading independent renewable power producer that acquires, develops, builds, owns and operates wind, hydro, and solar projects. Since our inception in 2010, we have acquired or developed \$1.5 billion of wind, hydro and solar projects across Canada and the United States. BluEarth is proud to be investing in British Columbia - both in people and resources. Currently, we have 11 operating facilities totaling 120 MW with 21 full-time employees in operations. We work side by side with our First Nations partners to provide ongoing, long term benefits to the regions we operate in, in addition to contributing \$4.5 million annually in provincial taxes and royalties.

In addition to supporting Clean Energy BC’s submission, BluEarth has chosen to comment on the Phase 2 interim report given the importance of the Comprehensive Review of BC Hydro will be in informing the 2021 Integrated Resource Plan (IRP). As an owner of operating projects as well as development opportunities in the Province, we are keenly following the development of the 2021 IRP to inform our future investment strategy. We acknowledge the challenges and uncertainty of the energy transition faced by BC Hydro (and other utilities in many jurisdictions) that have been identified in the Phase II Interim Report. We are supportive of the move to a 100% clean grid and the need to look at new ways to meet customer demand, however we are concerned with some of the preliminary positions articulated in the report. Specifically, we do not support the proposal to remove self-sufficiency provisions in the *Clean Energy Act* and rely on other jurisdictions to meet BC’s long-term electricity needs and CleanBC goals. Further, given the Province’s commitment to UNDRIP and the recommendations in the BCUC’s final report on the Indigenous Utilities Regulation Inquiry, we suggest the Interim Report prematurely dismisses the opportunity and impact of First Nation partnerships in Independent Power Projects.

The decision to eliminate self-sufficiency in the *Clean Energy Act* should be carefully considered and extensively consulted upon due to the impact this will have on economic opportunities in the province for both private sector investment and jobs, First Nations opportunities, CleanBC goals, long-term rate impacts and resiliency. We support CEBC’s request for further consultations on the Report and suggest comments around the supply/demand balance in the Province are out of place until the 2021 IRP has concluded.

BluEarth remains committed to contributing to the BC economy for the good of all British Columbians. As the Ministry finalizes the Phase II report recommendations and BC Hydro continues through the IRP process, we are hopeful that our industry’s ability to partner with First Nations to supply affordable, clean, safe, reliable, low cost, renewable power can continue to play a central role in the future of the Province. Thank you for the opportunity to provide feedback to the Interim report and we look forward to further discussions.

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