

## Chapter 4: Consultation

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## Introduction

This chapter sets out the consultation process that occurred to develop the 2021 Integrated Resource Plan (**2021 IRP**, filed as Appendix B to the 2021 IRP Application). It describes the results of this process and how the results informed the 2021 IRP. This chapter is structured as follows:

- The consultation process;
- Incorporating phase one input into the Draft Integrated Resource Plan;
- Summarizing phase two feedback on the Draft Integrated Resource Plan; and
- Considering phase two feedback on the Draft Integrated Resource Plan.

## The Consultation Process

A broad and extensive consultation process occurred during the development of BC Hydro's 2021 IRP. The following objectives guided the overall design of our consultation activities:

- Accessible: make it simple and easy for British Columbians to participate;
- Inclusive: provide opportunities to gather input from diverse perspectives of BC Hydro customers and B.C. residents impacted by our activities;
- Layered: provide both high-level opportunities as well as opportunities to participate at a more detailed level;
- Impactful: align the input sought with the information that decision-makers require to make informed decisions; and
- Transparent: record feedback received and produce consultation reports that demonstrate how feedback was considered and reflected.

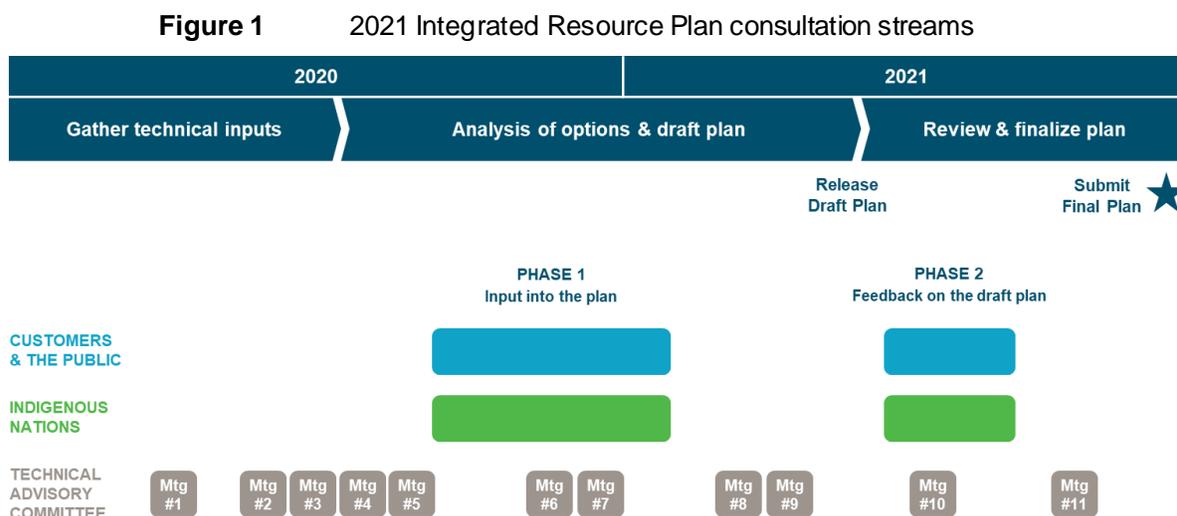
The consultation process was referred to as “Clean Power 2040”. Information about our engagement activities, including consultation materials, detailed feedback received, and consultation reports is available at [www.bchydro.com/cleanpower2040](http://www.bchydro.com/cleanpower2040).

## We Undertook Three Streams of Consultation

BC Hydro undertook consultation through three streams, which included a public and customer stream, an Indigenous Nations stream, and a technical stream. Engagement efforts were valuable in supporting the alignment of the 2021 IRP elements with broad values and interests, understanding related interests for future planning and

subsequent applications, and checking our planning assumptions and analysis with technical experts along the way.<sup>1</sup>

The three consultation streams are illustrated in [Figure 1](#) below.



## We conducted two phases of broad consultation

The public and customer, and Indigenous Nations consultation streams each occurred in two phases.

Phase one occurred from September 2020 until February 2021 and was focused on seeking input on what matters to people about planning topics before we developed the Draft Integrated Resource Plan. This enabled us to consider participants' values and interests while drafting the plan and, in many cases, reflect those values and interests into the Draft Integrated Resource Plan. The Draft Integrated Resource Plan was released on June 21, 2021. It is included as Appendix D to the 2021 IRP Application.

Phase two occurred from June 2021 to September 2021 and was focused on gathering feedback on the elements identified in the Draft Integrated Resource Plan and the extent to which those elements aligned with participant values and interests. This feedback was then used to inform the 2021 IRP.

While the information and engagement materials we provided were similar across the public and customer and Indigenous Nations streams, as described below, the methods, depth and delivery were tailored to the fit the needs of the audiences.

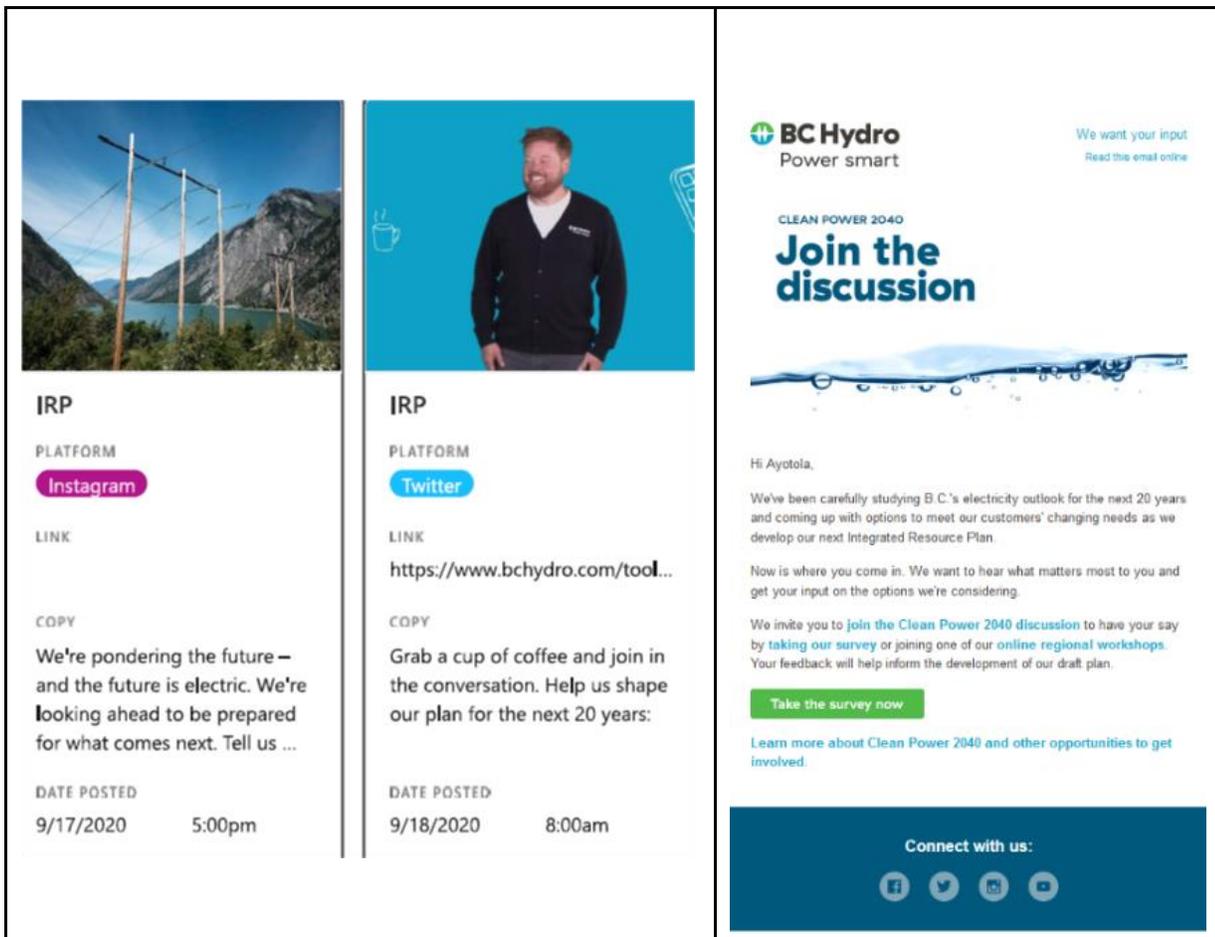
<sup>1</sup> Throughout this chapter we refer to the elements of the Draft Integrated Resource Plan and/or 2021 IRP elements which, in both cases, refers to each of the Base Resource Plan elements and one Contingency Resource Plan element (utility-scale batteries) as outlined in Chapter 7 to Chapter 9 of the 2021 IRP and Chapter 7 and Chapter 8 of the Application.

## Public and Customer Stream

### Phase One

Notification of opportunities to get involved in the planning process occurred through broad public awareness activities, including various social media platforms (i.e., Twitter and Facebook), newsletter, and email lists. [Figure 2](#) below shows a sample of some of the notifications we used. Introductory informational videos were also used to generate interest in our long-term planning process – click [here](#) to view one of the videos.

**Figure 2 Engagement Notification Samples**



BC Hydro used an array of forums to gather what matters to people about our initial planning objectives and planning topics. These forums included online engagement surveys (a short and a long survey), public interactive workshops, local government sessions, an online digital dialogue, a telephone town hall, and a youth engagement.

Across all of our forums, 6,337 people participated in our phase one consultation.<sup>2</sup> This included 6,063 survey respondents, 64 digital dialogue participants, 25 local government representatives, 57 public workshop participants, 98 telephone town hall participants, 29 youth engagement participants, and one written submission.

Appendix F-1 to the 2021 IRP Application provides details on the public and customer consultation process, including notification, forums, number of participants, and input from phase one. Additional related materials are found on BC Hydro's Clean Power 2040 website at [www.bchydro.com/cleanpower2040](http://www.bchydro.com/cleanpower2040).

## ***Phase Two***

In phase two, we asked for feedback on the Draft Integrated Resource Plan by asking how its elements aligned with participant values and interests.

The methods used to gather feedback on the Draft Integrated Resource Plan were similar to those used in phase one in that all of the same forums were used. For phase two, we made the Draft Integrated Resource Plan available for review. We also added a customer survey with a representative sample of BC Hydro's residential customers and provided opportunity for feedback through an online comment form.

Across all of our forums, 2,537 people participated in our phase two consultation.<sup>3</sup> This included 2,001 survey respondents, 60 digital dialogue participants, 48 local government representatives, 11 written submissions from organizations, eight public session participants, 117 telephone town hall participants, 278 submissions from individuals, and 14 youth engagement participants.

Appendix F-2 to the 2021 IRP Application provides details on the phase two public and customer consultation process. Additional related materials are found on BC Hydro's Clean Power 2040 website at [www.bchydro.com/cleanpower2040](http://www.bchydro.com/cleanpower2040).

## ***Indigenous Nations Stream***

BC Hydro's objectives in consulting Indigenous Nations on the 2021 IRP were to advance reconciliation through meeting the duty to consult and to support BC Hydro's commitment to implementing the principles of the United Nations Declaration on the Rights of Indigenous Peoples and the Truth and Reconciliation Commission Calls to Action. In addition to the objectives stated in The Consultation Process section above, BC Hydro had the following considerations in consulting with Indigenous Nations:

- Identifying Indigenous interests and values early in the planning process: BC Hydro commenced engagement early in the development of the 2021 IRP, before developing a draft plan;

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<sup>2</sup> Individuals may have participated in more than one forum.

<sup>3</sup> Individuals may have participated in more than one forum. Numbers do not include group presentations.

- Ensuring multiple methods and opportunities for Indigenous engagement: ensuring that the timing and format of consultation reflects Indigenous Nations' capacity during the Provincial state of emergency due to the COVID-19 pandemic; and
- Continuing engagement: BC Hydro recognizes that the 2021 IRP is the first step in engaging with Indigenous Nations on BC Hydro's strategy to meet future electricity demand. BC Hydro will continue to engage with Indigenous Nations in implementing the 2021 IRP and on future projects in response to the plan, which will be subject to separate consultation and approval processes.

BC Hydro invited the BC First Nations Energy and Mining Council to participate in the consultation on the development of the 2021 IRP to provide a province-wide Indigenous perspective.<sup>4</sup>

BC Hydro provided capacity funding to the BC First Nations Energy and Mining Council to participate in both the Indigenous Nations consultation stream and the Technical Advisory Committee and provide reports with their input into the development of and feedback on the Draft Integrated Resource Plan.

### ***Phase One***

In phase one, all Indigenous Nations and Tribal Councils in B.C. were invited to participate in consultation.<sup>5</sup>

Indigenous Nations could provide input through full-day regional workshops, supplemental meetings with some individual Indigenous Nations, an online engagement survey and written correspondence. A consultation workbook was distributed to provide additional information on planning topics of interest.

In phase one, 64 Indigenous Nations, Tribal Councils, and Indigenous organizations participated in some aspect of the Indigenous consultation process. The virtual regional workshops were attended by 84 Indigenous representatives, representing 50 Indigenous Nations. Surveys were submitted by 59 Indigenous respondents. BC Hydro also held supplemental meetings with 10 Indigenous Nations and organizations.

Appendix E-1 to the 2021 IRP Application provides details on the Indigenous consultation process, including notification, forums, number of participants, consultation materials and input from phase one.

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<sup>4</sup> The BC First Nations Energy and Mining Council is a First Nations policy and facilitating organization to support First Nations. It is accountable to, and receives direction from, the First Nations Leadership Council and the First Nations of BC. BC First Nations Energy and Mining Council does not represent Indigenous rights holders in matters relating to consultation and accommodation.

<sup>5</sup> This means all Indigenous Nations in B.C. listed in the Province of British Columbia's Profile of Indigenous Peoples. In addition, Gitxsan Laxyip (Watershed) groups were added to our notification list in phase two. All Tribal Councils were contacted unless BC Hydro's current communication protocol with the Tribal Council or Indigenous Nations indicated engagement with individual Nations was preferred.

## ***Phase Two***

In phase two, all Indigenous Nations and Tribal Councils in the B.C. were invited to participate and provide feedback on the Draft Integrated Resource Plan. Similar methods were used to gather feedback on the Draft Integrated Resource Plan as was used in phase one consultation. For phase two consultation, we made the full Draft Integrated Resource Plan available for review.

In phase two, 53 Indigenous Nations, Tribal Councils, and Indigenous organizations participated in some aspect of the Indigenous consultation process. The virtual regional workshops were attended by 58 Indigenous representatives, representing 41 Indigenous Nations. Surveys were submitted by 19 Indigenous respondents. BC Hydro also held supplemental meetings with 11 Indigenous Nations and organizations.

Appendix E-2 to the 2021 IRP Application provides details on the Indigenous consultation process including notification, forums, number of participants, consultation materials, and input from phase two.

### ***Technical stream***

BC Hydro's technical consultation consisted of engagement with a Technical Advisory Committee.

We also updated our electricity Resource Options Database through engagement with industry experts and in collaboration with FortisBC. The Resource Options Database is a planning input to the 2021 IRP and is described in Chapter 6, section 6.3 and Appendix J of the 2021 IRP Application.

Finally, we consulted on how our transmission planning aligned with Attachment K of BC Hydro's Open Access Transmission Tariff. Attachment K sets minimum requirements when BC Hydro undertakes Transmission System planning activities. Generally, Attachment K is intended to ensure that interested parties can participate in and provide input into transmission planning and that planning is undertaken in an open and public manner. In turn, BC Hydro commits to considering such input received. A description of this consultation and how we have fulfilled the requirements of Attachment K is found in Appendix F-4 to the 2021 IRP Application.

### ***The Technical Advisory Committee***

The 2021 IRP Technical Advisory Committee was established in February 2020 to provide ongoing, detailed, technical advice and feedback from a group of knowledgeable parties with experience relevant to BC Hydro's resource planning.

The Technical Advisory Committee mandate, as outlined in its Terms of Reference, was to provide feedback on planning inputs, assumptions, and analysis to BC Hydro during the 2021 IRP development prior to the plan being filed with the Commission.

The Technical Advisory Committee members represented diverse interests including customer groups, Indigenous, environmental, independent power producers, sustainable energy, municipal government, low income, other utilities, and academics.

BC Hydro representatives chaired and moderated the Technical Advisory Committee sessions. Staff representatives from the Ministry of Energy, Mines and Low Carbon Innovation and the Commission were invited to attend the meetings as observers.

The Technical Advisory Committee met eleven times for discussions on planning assumptions, planning inputs and analysis, as well as to provide feedback on the Draft Integrated Resource Plan.

The Technical Advisory Committee Consultation Summary Report is provided in Appendix F-3 to the 2021 IRP Application. It includes the Terms of Reference, membership, more details on the process, along with a summary of input and feedback received and how that feedback was considered in the development of the 2021 IRP. Additional related materials are found on BC Hydro's Clean Power 2040 website at [www.bchydro.com/cleanpower2040](http://www.bchydro.com/cleanpower2040).

## Incorporating Phase One Input into the Draft Integrated Resource Plan

During the first phase of consultation we sought input on planning objectives and key topic areas associated with the development of the 2021 IRP. The following provides a summary of some of the themes we heard during phase one of consultation, and how this input informed various elements of the Draft Integrated Resource Plan.<sup>6</sup>

### Phase one input on planning objectives

BC Hydro sought input on the relative priority that consultation participants would place on initial planning objectives as well as whether BC Hydro had identified the right objectives. The objectives were:

- Keeping costs down for customers;
- Reducing greenhouse gas emissions through clean electricity;
- Limiting land and water impacts;
- Supporting reconciliation with Indigenous peoples; and
- Supporting the growth of B.C.'s economy.

Public and customer participants' top priority was reducing greenhouse gas emissions through clean electricity. Keeping costs down for customers and limiting land and water impacts were the second and third priority objectives.

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<sup>6</sup> A more extensive summary of input from phase one can be found in Appendix E-1 and Appendix F-1 to the 2021 IRP Application.

Indigenous participants' top priority was supporting reconciliation with Indigenous peoples. Limiting land and water impacts was the second priority objective for Indigenous participants.

Supporting reconciliation with Indigenous peoples was initially framed as a stand-alone planning objective and, therefore, something that could be traded-off with other planning objectives. Although supporting reconciliation had strong support, input from Indigenous participants viewed it as being inappropriately expressed as an objective that could be traded-off against other objectives when comparing alternatives. We heard that all the other planning objectives have Indigenous interests that cannot be easily separated from supporting reconciliation. Based on this perspective, BC Hydro considered Indigenous interests as part of each planning objective.

There were many different Indigenous interests expressed related to the United Nations Declaration on the Rights of Indigenous People including revenue sharing, historic redress, Indigenous ownership in the clean energy sector and environmental stewardship.

### **ALIGNMENT WITH PHASE ONE INPUT ON PLANNING OBJECTIVES**

One of the top priorities of Indigenous participants was limiting land and water impacts. Keeping costs down and limiting land and water impacts were two of the top priorities for the public and customers. The Draft Integrated Resource Plan included the following elements that are consistent with these priorities:

- Advancing and expanding our energy conservation and demand response programs;
- Introducing voluntary opt-in time-varying rates, rather than default opt-out rates, as a new capacity resource; and
- Upgrading the existing transmission system to the South Coast through improvements to existing substations and the addition of supplemental substations to avoid the need for new transmission lines - and the land corridors associated with them.<sup>7</sup>

### **Phase one input on demand-side measures**

Public and customer participants expressed strong support for BC Hydro's conservation programs and time-varying rates. Support was also expressed for demand response initiatives.

Indigenous participants expressed support for conservation and openness to time-varying rates but emphasized the importance of engaging with Nations to consider their unique circumstances in developing demand-side measures programs.

The public and customers, and Indigenous participants expressed concerns about fairness and equity regarding time-varying rates. They expressed that if implemented, time-varying rates might unduly penalize those unable to

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<sup>7</sup> In this context, substations may refer to substations and capacitor stations.

adjust their electricity consumption to take advantage of the rates. Data privacy concerns were also raised with demand response programs.

Technical Advisory Committee members expressed the importance of developing a plan that was flexible and was able to respond to uncertainty. Technical Advisory Committee members encouraged BC Hydro to develop stronger demand-side measures resource options in the development of the Draft Integrated Resource Plan.

### **ALIGNMENT WITH PHASE ONE INPUT ON DEMAND-SIDE MEASURES**

Consistent with input received, demand-side measures were emphasized in the Base Resource Plan of the Draft Integrated Resource Plan. The Draft Integrated Resource Plan incorporated a ramping up of energy efficiency programs when needed and time-varying rates and demand response programs to help shift electricity use to off-peak times. In response to input regarding demand-side measures, the Draft Integrated Resource Plan:

- Addressed customer choice: considering equity and affordability, and data privacy issues noted by some participants, the Draft Integrated Resource Plan included pursuing voluntary opt-in time-varying rates and supporting demand response programs, where customers can opt-in to participate, rather than needing to opt-out of a default rate that may not be well-suited to them;
- Addressed flexibility and scalability: considering Technical Advisory Committee input on portfolio flexibility, the demand-side measures in the Draft Integrated Resource Plan provided a scalable portfolio that could ramp up over time as required to meet future customer needs and to avoid or defer the need for capital investments;
- Expanded the consideration of demand-side measures options: considering Technical Advisory Committee input to broaden demand-side measure options, new, higher levels of demand-side measures resource options were analyzed; and
- Addressed the unique circumstances of Indigenous communities: considering Indigenous input to take into account the unique circumstances of their communities so programs are accessible and responsive to their community's needs, BC Hydro will continue to offer demand-side measure programs which attempt to address the unique barriers faced by Indigenous communities in implementing energy savings measures.

### **Phase one input on expiring electricity purchase agreements**

Public and customer participants' top priorities regarding expiring electricity purchase agreements were to keep costs as low as possible, followed by maintaining contracts that support reconciliation and create opportunities with Indigenous Nations as well as continuing contracts to have the flexibility to respond to future needs.

Questions were raised from the public and customers and the Technical Advisory Committee about how expiring electricity purchase agreements would be valued.

Indigenous participants expressed a strong interest in renewing electricity purchase agreements that benefit Indigenous communities. Participants suggested BC Hydro should do more to create opportunities for Indigenous participation in the clean energy industry which was linked to supporting reconciliation.

This included recommendations from the BC First Nations Energy and Mining Council to prioritize renewal of electricity purchase agreements for independent power projects with Indigenous ownership along with other recommendations to encourage Indigenous ownership of these projects. These recommendations are set out in the BC First Nations Energy and Mining Council report dated January 29, 2021 and their Technical Advisory Committee submission dated January 2021, both included in Appendix E-1.

### **ALIGNMENT WITH PHASE ONE INPUT ON EXPIRING ELECTRICITY PURCHASE AGREEMENTS**

The Draft Integrated Resource Plan included market-price-based renewal option for clean and renewable electricity purchase agreements expiring over the next five years. This renewal option would:

- Maintain contracts at a market-based price. This would provide additional certainty to BC Hydro that these lower-cost projects would be available to displace more expensive greenfield supply when additional resources would otherwise be needed in the future; and
- Be consistent with the priority among public, customers and Indigenous participants to limit land and water impacts. Relying on existing infrastructure helps reduce or defer the land and water impacts associated with building new infrastructure.

The Draft Integrated Resource Plan assumed that projects fueled by natural gas would not be renewed. This also aligned with input from the public and customers placing a high priority on reducing greenhouse gas emissions through clean electricity.

The Draft Integrated Resource Plan described the renewal of all clean electricity purchase agreements expiring over the next five years, including those projects with Indigenous Nations ownership. Independent power producers do not generally disclose to BC Hydro the details about Indigenous involvement or participation in relation to their clean energy projects, including whether there is Indigenous ownership. There may be other Indigenous economic involvement in independent power projects with expiring electricity purchase agreements that is not disclosed to BC Hydro.

Priority renewal of electricity purchase agreements with Indigenous Nations ownership is unnecessary because BC Hydro is offering market-based renewals to all electricity purchase agreements expiring over the next five years, including those projects which have Indigenous Nations ownership.

## **Phase one input on upgrading BC Hydro's system**

The majority of public and customer participants expressed broad support for upgrading BC Hydro's system, which included upgrades to transmission infrastructure. The highest number of comments favoured upgrading existing assets because it was perceived to be a low-cost option with lower environmental impact compared to new

infrastructure. Those that supported this option expressed concerns and questions about the need and cost for additional transmission lines.

Indigenous participants expressed that BC Hydro should use its existing infrastructure, instead of building new infrastructure, in order to mitigate further environmental impact. Indigenous participants were interested in Transmission upgrades and related Transmission ownership opportunities.

### **ALIGNMENT WITH PHASE ONE INPUT ON UPGRADING BC HYDRO'S SYSTEM**

The Draft Integrated Resource Plan described upgrading the existing transmission system to the South Coast through improvements to existing substations and the addition of supplemental substations. This avoids the need for new transmission lines, and the land impacts associated with them.<sup>8</sup>

Upgrading the existing transmission system to the South Coast aligns with one of the priority objectives among the public, customer and the Indigenous Nation participants of limiting land and water impacts. It also aligns with the preference among participants to first upgrade existing infrastructure before building new infrastructure. This was also the lowest cost supply option, which aligns with the priority to keep costs down.

Consultation on the 2021 IRP is the first opportunity to engage potentially affected Indigenous Nations on this conceptual level transmission upgrade plan. We will be engaging Indigenous Nations further with respect to the implementation of this Base Resource Plan element of the 2021 IRP. This will involve BC Hydro undertaking further, early engagement with affected Indigenous Nations as more specific plans for the transmission upgrades are developed.

### **Phase one input on BC Hydro small plants at or reaching end-of-life**

Public and customer participants' highest priority for BC Hydro's small generation plants was decommissioning facilities and restoring the environmental habitat, followed by keeping costs as low as possible. An interest was expressed for BC Hydro to work with communities and/or Indigenous Nations to explore local redevelopment options; as well as an interest for further analysis of costs and benefits.

For Indigenous Nations participants, continuing to pursue opportunities that support reconciliation with Indigenous Nations was ranked as the top priority, followed closely by decommissioning facilities and restoring the environmental habitat. Participants indicated it was important to discuss plans for these facilities with the Indigenous Nations whose territory they are located in. There was interest expressed by participants in exploring Indigenous ownership in, and BC Hydro divestment of, small generation plants as part of reconciliation.

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<sup>8</sup> In this context, substations may refer to substations and capacitor stations

## **ALIGNMENT WITH PHASE ONE INPUT ON BC HYDRO SMALL PLANTS AT OR REACHING END-OF-LIFE**

The Draft Integrated Resource Plan set out a schedule for undertaking a structured approach to evaluate six small generation plants that are at or are approaching end-of-life on a facility-by-facility basis to determine whether to decommission or refurbish. The Draft Integrated Resource Plan included engaging with affected Indigenous Nations and local communities as part of this process.

This approach was consistent with the input received through consultation because:

- A case-by-case approach allows for a meaningful engagement process with affected Indigenous Nations and local communities; and
- Using a case-by-case, staged approach allows us to manage costs.

In addition, if decisions on these small generation plants are made later, those decisions can be informed by updated assessments of future needs based on actual load and forecast load in future years.

## **Phase one input on local new power supply: utility-scale batteries and pumped hydro storage**

Almost two-thirds of public and customer participants supported the use of utility-scale batteries and pumped hydro storage as a local storage solution. This response also saw the highest neutral percentages. Participants supported the relative flexibility of placement and smaller physical footprint of batteries compared to larger capital infrastructure. Participants opposing batteries cited harmful environmental impact in terms of production, materials used, and disposal.

For Indigenous Nations participants, local power sources, including pumped hydro storage and batteries, ranked closely with upgrading the system, and secondary to conservation.

The BC First Nations Energy and Mining Council supports new power sources such as utility-scale batteries and pumped hydro storage so long as they are aligned with United Nations Declaration of the Rights of Indigenous Peoples. Specifically, the BC First Nations Energy and Mining Council commented that in fulfilling its commitments under the *Declaration on the Rights of Indigenous Peoples Act*, the Province and BC Hydro should be working with local Nations to develop opportunities for Indigenous partnerships and ownership of assets throughout the supply chain, and this should include opportunities related to utility-scale batteries or pumped hydro storage. These comments are set out in the BC First Nations Energy and Mining Council report dated January 29, 2021 and their Technical Advisory Committee submission dated January 2021, both included in Appendix E-1.

## **ALIGNMENT WITH PHASE ONE INPUT ON LOCAL, NEW POWER SUPPLY: UTILITY-SCALE BATTERIES AND PUMPED HYDRO STORAGE**

The Draft Integrated Resource Plan included exploring utility-scale batteries in the South Coast to prepare for the cost-effective deployment if needed under a future contingency plan. Further, BC Hydro analysis showed that

batteries are preferred over pumped hydro storage given their short lead times, relatively small footprint, and flexibility to deploy in incrementally sized installations.

## Summary of Phase Two Feedback on the Draft Integrated Resource Plan

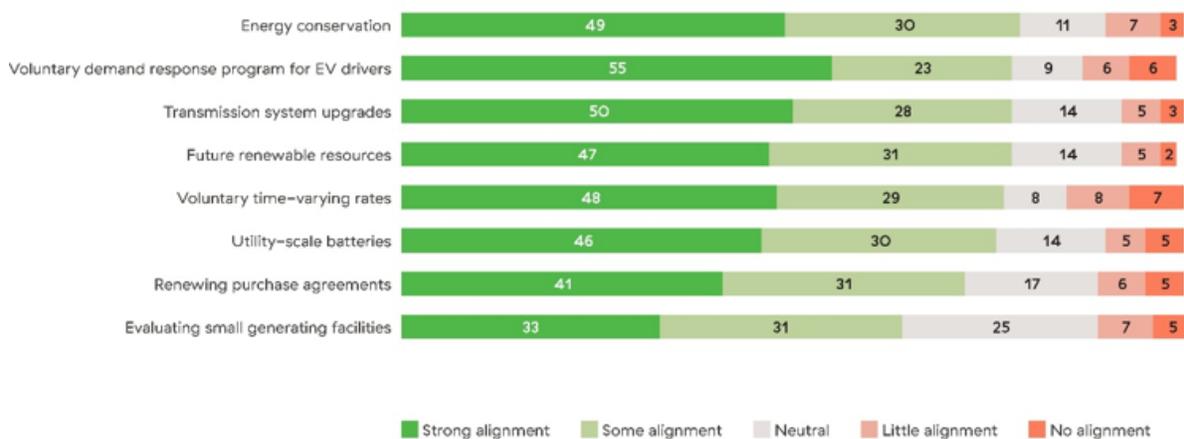
The We Undertook Three Streams of Consultation section, above, highlights how the development of the Draft Integrated Resource Plan reflected the interests and values BC Hydro heard during phase one consultation. The Draft Integrated Resource Plan was released on June 21, 2021, and we next gathered feedback about how the Draft Integrated Resource Plan aligned with participant values and interests gathered in phase one consultation.

Below is a summary of feedback on the Draft Integrated Resource Plan from each of the three consultation streams.

### Public and customer feedback

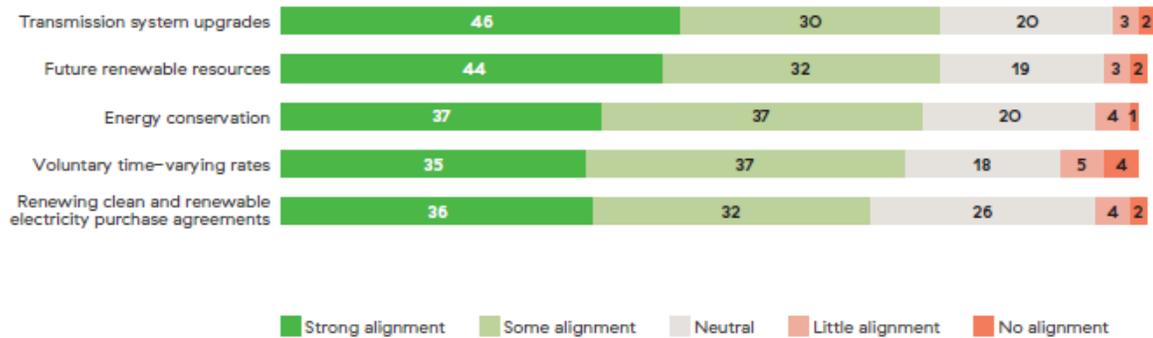
Feedback on the Draft Integrated Resource Plan showed strong positive alignment with all draft elements. [Figure 1](#) below shows results of the public survey, which includes responses from 1,149 participants.

**Figure 1 Public Survey Results (Per Cent)**



[Figure 2](#) shows results of the customer survey, which includes responses from 852 participants and is a representative BC Hydro customer sample.

**Figure 2 Customer Survey Results (Per Cent)**



As shown above, most participants indicated positive alignment with the elements in the Draft Integrated Resource Plan. Among the most common mentions under the final feedback section of the surveys was overall support for the Draft Integrated Resource Plan. However, some members of the public and customers did raise concerns. Thematically, these included:

- Equity and affordability concerns with time-varying rates;
- Concerns that our market-price-based approach to renewing electricity purchase agreements of clean energy projects may not provide fair value to the independent power producers; and
- Local community concern was raised about the assumption that the natural gas-fueled Island Generation Electricity Purchase Agreement would not be renewed, citing loss of jobs, loss of community tax benefits, and concerns regarding Vancouver Island reliability.

Additional feedback themes included interest in how BC Hydro is preparing for electrification, continued interest in renewable resources, distributed generation, and opportunities for customer-based generation.

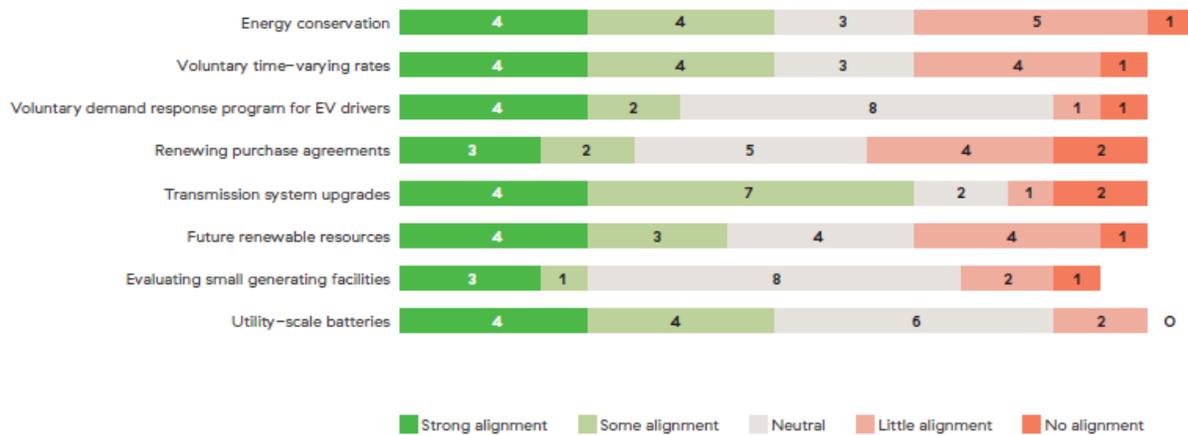
A full summary of public and customer feedback on each element of the Draft Integrated Resource Plan is included in Appendix F-2 to the 2021 IRP Application.

## Indigenous feedback

Overall, Indigenous feedback was mainly aligned with or neutral on each element of the Draft Integrated Resource Plan. Most of the interests and concerns raised related to implementation issues with respect to specific elements of the Draft Integrated Resource Plan. This is based on feedback from regional workshops, supplemental meetings, survey responses, and written submissions.

[Figure 3](#) below shows Indigenous survey responses regarding the Draft Integrated Resource Plan. As there were only 19 survey respondents, the numbers shown below represent the actual number of responses and not percentages.

**Figure 3 Indigenous Survey Results (Number of Responses)**



Themes we heard from the Indigenous feedback on the Draft Integrated Resource Plan included:

- Ensuring actions take into consideration the circumstances of Indigenous communities and that those communities are involved in decisions affecting them;
- A strong interest in new clean energy development opportunities (i.e., in addition to electricity purchase agreement renewals), which was linked by participants to supporting reconciliation and incorporating the principles of the United Nations Declaration on the Rights of Indigenous Peoples; and
- A strong interest in low carbon economic development opportunities in the northern B.C., including a proactive approach to increased transmission capacity to the North Coast.

A specific issue was also raised on the proposed timing of the small plant evaluation for the Alouette facility.

We also heard feedback from Indigenous participants on issues that were not within the scope of the 2021 IRP. BC Hydro’s response to these issues is found in the section, Response to What We Heard from Indigenous Participants About Matters Outside the Scope of the 2021 IRP, below.

A full summary of Indigenous feedback on each element of the Draft Integrated Resource Plan is included in Appendix E-2 to the 2021 IRP Application.

## Technical Advisory Committee feedback

Although some feedback from Technical Advisory Committee members spoke to their general alignment with the elements of the Draft Integrated Resource Plan, most of the Technical Advisory Committee member feedback focused on the underlying assumptions and analysis.

Themes we heard from the Technical Advisory Committee included:

- Provide additional analysis, including the implications of pursuing even higher levels of energy efficiency, time-varying rates and demand response combinations, while addressing equity issues in program design;

- Provide more information about and consider incorporating other community benefits in the approach to renewing expiring electricity purchase agreements. Two Technical Advisory Committee members expressed their view that the market-price-based approach doesn't fully reflect the economic and social benefits provided by these facilities. Other Technical Advisory Committee members expressed support for lower prices and a market-price-based approach to energy purchase agreement renewals, in principle. One Technical Advisory Committee member expressed support for competitive market rates in the short term and increasing the prices when need develops. One Technical Advisory Committee member expressed the need for renewal offers to be in the ratepayers' interest;
- Provide a stronger profile on the climate emergency and be more proactive on electrification. This included recognizing and explicitly indicating that the Accelerated electrification scenario meets Provincial greenhouse gas emissions reduction targets. Prior to the release of its Electrification Plan, BC Hydro was also encouraged to be more proactive on electrification, and do more to incent electrification;
- Provide more information and analysis on the Contingency Resource Plans, including information about when and how BC Hydro may move from the Base Resource Plan to one of the Contingency Resource Plans (particularly to meet the Accelerated electrification scenario). This information should include costing, resource lead-times, order of priorities and decision markers.

The nature of the Technical Advisory Committee member feedback was different from that of other streams where we asked how elements aligned with values and interests. Given the overall focus on detailed planning assumptions and analysis of the Technical Advisory Committee member feedback, a response table is provided in Appendix F-3 to the 2021 IRP Application.

## Considering Phase Two Feedback on the Draft Integrated Resource Plan

This section first provides, in Response to What We Heard from Indigenous Participants About Matters Outside the Scope of the 2021 IRP, a response to feedback we heard from Indigenous participants on matters outside of the scope of the 2021 IRP. It then summarizes the feedback we heard during phase two consultation for each Draft Integrated Resource Plan element and how this feedback was considered when finalizing the 2021 IRP.

### Response to What We Heard from Indigenous Participants About Matters Outside the Scope of the 2021 IRP

During the engagement, we heard feedback from Indigenous participants on certain issues that are outside the scope of the 2021 IRP. These included revenue sharing, historic redress and Indigenous participation in clean generation and/or transmission projects, including Indigenous-owned utilities.

In June 2021, the Province signalled its desire to “engage First Nations to identify and support clean energy opportunities related to CleanBC, the Comprehensive Review of BC Hydro, and the B.C. Utilities Commission Inquiry on the Regulation of Indigenous Utilities”, as proposed action 4.34 within its Draft *Declaration on the Rights of Indigenous Peoples Act* Action Plan. On November 17, 2021, the Government of B.C. and the First Nations Leadership Council and the BC First Nations Energy and Mining Council, launched a jointly designed and co-led Indigenous Clean Energy Opportunities engagement process. This process presents the opportunity to explore what First Nations participation in existing and emerging clean energy opportunities might look like in order to benefit the broadest possible range of First Nation communities and meet First Nations’ interests around clean energy, including around economic development, energy security, self-governance, and electricity affordability.

The jointly-led process is also intended to facilitate an open dialogue between the Province and First Nations to meaningfully explore and develop recommendations for policy, regulatory or program supports to enable greater Indigenous participation in the clean energy sector. This could include electricity, clean gasses and biofuels. This process may provide an avenue to discuss matters of interest that are outside the scope of the 2021 IRP.

Incorporating the principles of the United Nations Declaration on the Rights of Indigenous People, and the Truth and Reconciliation Calls to Action into BC Hydro’s business is much broader than the 2021 IRP. BC Hydro is working with Indigenous Nations to find meaningful paths to reconciliation through many areas of our business. Building relationships with Indigenous Nations, particularly those most impacted by our presence in their territory, will continue to be a focus for BC Hydro and will inform how we incorporate the principles of United Nations Declaration on the Rights of Indigenous People into our business.

As a result of the significant interest in BC Hydro’s plan to implement the principles of the United Nations Declaration on the Rights of Indigenous People, BC Hydro used the regional workshops and online survey in the summer of 2021 to also engage Indigenous Nations on this topic. However, we note that this consultation goes beyond the scope of BC Hydro’s 2021 IRP.

## **Demand-Side Measures: Energy Efficiency**

BC Hydro asked participants how the Base Resource Plan element to continue with current energy conservation programs and ramp up when needed aligned with their values and interests, and to state their reasons.

### **PUBLIC AND CUSTOMERS**

Overall, 79% of public survey respondents expressed positive alignment with this element, while 10% indicated little or no support. Customer survey results were consistent with these results, with 74% positive alignment and 5% little or no alignment.

In terms of themes from the survey and forums, participants thought this element was a pragmatic, cost-effective approach that will contribute to sustainability, and protect the environment and reduce greenhouse gas emission. Participants also highlighted the importance of education and incentives.

Participants expressed interest in BC Hydro doing more, sooner. Participants commented on the importance of providing clarity on why BC Hydro is asking customers to consume more electricity through fuel switching and at the same time asking customers to conserve energy.

## **INDIGENOUS NATIONS**

Overall, Indigenous feedback was mainly aligned with or neutral on this element of the plan.

Similar to input received in the first round of consultation, Indigenous participants wanted BC Hydro to consider the unique circumstances of their communities so that programs are accessible and responsive to their community's needs. There was an interest in seeing more support for programs targeting the needs of Indigenous communities, particularly in rural, remote, and cold weather climates.

Affordability was a concern as customers' bills can be affected differently depending on their ability to access and benefit from energy savings from demand-side measure programs.

The BC First Nations Energy and Mining Council supported this element provided energy efficiency programs were in accordance with United Nations Declaration on the Rights of Indigenous Peoples. BC First Nations Energy and Mining Council proposed that BC Hydro continue its support for energy efficiency planning that is led by First Nations in their communities and proposed to expand the availability of energy specialist positions to help facilitate this. These comments are set out in the BC First Nations Energy and Mining Council report dated July 31, 2021 and their Technical Advisory Committee submission dated July 2021, both included in Appendix E-2.

## **HOW FEEDBACK WAS CONSIDERED**

In response to feedback that BC Hydro should do more in the area of energy efficiency, BC Hydro prefers a staged approach to gain experience and learning and so additional resources are timed with increases in need.

With regard to the relationship between consuming more electricity by fuel switching while also conserving electricity, BC Hydro's demand-side measures programs have always been about encouraging the smart and efficient use of electricity. Helping our customers switch from fossil fuels to clean electricity helps us reduce greenhouse gas emissions. In this way, our growth and conservation strategies are complementary. We can encourage residential customers to improve home insulation to reduce heating energy and costs, while also encouraging them to switch from a gas to an electric vehicle.

BC Hydro considers equity and access issues for the public and Indigenous participants when designing specific programs. Energy efficiency programs are designed to address barriers to energy efficiency. BC Hydro's Demand Side Management Expenditures Schedule, filed as part of our Fiscal 2023 to Fiscal 2025 Revenue Requirements Application, includes increased funding for programs for lower-income customers.

BC Hydro has a Conservation and Energy Management Advisory Committee, which provides feedback on BC Hydro's demand-side measures initiatives. The committee seeks input from a wide variety of perspectives, including Indigenous interests, as well as residential and lower-income customers. The work of this committee can

help BC Hydro continue to improve access to demand-side measures program offerings for lower-income and Indigenous customers.

In response to the Indigenous Nations input and feedback, which asks BC Hydro to consider the circumstances of Indigenous communities:

- BC Hydro will continue to implement demand-side measure program offers designed for Indigenous customers, which attempt to address the unique barriers Indigenous communities face in implementing energy savings measures. These program offers have evolved over time to support the needs of Indigenous customers. Some aspects of current program offers that address this need include: training and salary support to enable Indigenous-led installation of energy savings measures in their communities; increased rebates on advanced energy savings measures to enable Indigenous Nations to undertake home energy upgrades during a renovation; and, support for energy champion positions in Indigenous organizations and communities to develop local capacity in energy management and climate action; and
- BC Hydro has recently partnered with the BC First Nations Energy and Mining Council, along with FortisBC and the Province to establish a one-year energy program specialist position. This position will provide support to First Nations by sharing information about available programs, helping communities to decide which programs meet their needs, assisting in determining eligibility requirements and helping communities to apply to these programs.

Consistent with the overall consultation results described above, the Base Resource Plan energy efficiency element was unchanged between the Draft Integrated Resource Plan and the 2021 IRP.

## **Demand-Side Measures: Voluntary Time-Varying Rates and Demand Response Program**

BC Hydro asked participants how the Base Resource Plan element to pursue voluntary time-varying rates and supporting demand response programs aligned with their values and interests and to state their reasons.

### **PUBLIC AND CUSTOMERS**

Overall, 77% of public survey respondents expressed positive alignment with this element, while 15% indicated little or no support. Customer survey results were similar, with 72% positive alignment and 9% little or no alignment.

Reasons why participants were aligned with this element included: because it's easy to implement, has worked elsewhere, is cost-effective by deferring new infrastructure and provides customers with the opportunity to lower their electricity bills.

Participants expressed support for the voluntary opt-in nature of this element. Participants also recognized this element could support them in managing their electricity use.

Those not aligned cited the concern that some customers would be penalized if they cannot shift their electricity use.

## **INDIGENOUS NATIONS**

Overall, Indigenous feedback was mainly aligned with, or neutral on, this Base Resource Plan element.

There was concern that time-varying rates could penalize Indigenous customers who are unable to shift their electricity use in response.

Most of the feedback relating to this Base Resource Plan element was that rates are less affordable for customers in rural and northern areas, particularly where they rely on electricity to heat their homes, and that time-varying rates should not exacerbate affordability challenges.

The BC First Nations Energy and Mining Council reiterated its support of this Base Resource Plan element on certain conditions, including that the element take into account the circumstances of Indigenous communities and that First Nations are directly engaged in program design and delivery. These comments are set out in the BC First Nations Energy and Mining Council report dated July 31, 2021 and their Technical Advisory Committee submission dated July 2021, both included in Appendix E-2.

## **HOW FEEDBACK WAS CONSIDERED**

In response to input and feedback received from customer and public and Indigenous Nations, the voluntary opt-in nature of time-varying rates and demand response programs were maintained for the 2021 IRP.

## **Demand-Side Measures: Electric Vehicle Peak Reduction**

BC Hydro asked participants how the draft Base Resource Plan element to pursue voluntary time-varying rates and demand response programs targeting electric vehicle drivers aligned with their values and interests, and to state their reasons.

## **PUBLIC AND CUSTOMERS**

Overall, 78% of public survey respondents expressed positive alignment with this element, while 12% indicated little or no support. Respondents thought this element was an effective, easy way to shift more demand to off-peak times.

Participants who were not aligned stated that electric vehicle owners may not be able to shift their charging hours, or that they, personally, did not own an electric vehicle.

## **INDIGENOUS NATIONS**

Overall, Indigenous feedback was mainly aligned with or neutral on this element of the Base Resource Plan. Specific feedback on this element was limited.

## **HOW FEEDBACK WAS CONSIDERED**

The electric vehicle peak reduction Base Resource Plan element was included unchanged in the 2021 IRP.

## Expiring electricity purchase agreements

BC Hydro asked participants how the Base Resource Plan element to offer a market-price-based renewal option for clean and renewable electricity purchase agreements that are expiring over the next five years aligned with their values and interests, and to state their reasons.

### **PUBLIC AND CUSTOMERS**

Overall, 72% of public survey respondents expressed strong or some alignment with this element, while 11% indicated little or no support. The customer survey results were similar with 68% expressing positive alignment, 26% neutral, and 6% expressing little or no alignment.

Participants aligned with this element stated it was because it keeps costs low. In addition, renewing existing electricity purchase agreements avoids new environmental impacts

Concerns focused on the market-price aspect of this element, including:

- Market price may be too low to ensure viability of the projects; and
- Contract renewals should be higher than the market price to reflect the benefits these projects bring to communities in B.C.

Participants also had questions about what market price means, how it is determined and implementation details.

Local community feedback expressed opposition for not contemplating renewing Island Generation natural gas-fired project. Opposition noted the potential loss of jobs, and community benefits in the way of taxes, as well as the removal of dependable power benefits for Vancouver Island.

### **INDIGENOUS NATIONS**

Overall, Indigenous feedback was mainly aligned with or neutral on this Base Resource Plan element.

There was substantial interest in new independent power producer opportunities with Indigenous ownership or revenue sharing. Some participants expressed disappointment that the Standing Offer Program is no longer an available opportunity.<sup>9</sup>

The BC First Nations Energy and Mining Council provided the following feedback:

- Electricity purchase agreements with Indigenous ownership should be renewed and new opportunities should be allowed, funded, and encouraged;
- Electricity purchase agreements and the desire to be independent power producers are linked to the United Nations Declaration on the Rights of Indigenous Peoples; and

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<sup>9</sup> The Standing Offer Program was for developers of small and clean energy projects to sell electricity to BC Hydro. It has been indefinitely suspended.

- Most importantly, these electricity purchase agreements shouldn't be at market rates but instead at preferred rates similar to historical rates. There clearly will be a need for power in the next 10 years, so preparing now benefits everyone.

The BC First Nations Energy and Mining Council Report provided the following recommendations:

- Give priority for electricity purchase agreements with Indigenous ownership;
- Work with Indigenous independent power producers to determine a price that enables continued operation;
- Consider premium pricing for Indigenous-owned projects;
- Provide price increases when electricity needs increase; and
- Require consent from relevant Indigenous Nations for electricity purchase agreements without Indigenous ownership to facilitate agreements between the independent power producer-owner and affected Nation(s).

The above comments are set out in the BC First Nations Energy and Mining Council report dated July 31, 2021 and their Technical Advisory Committee submission dated July 2021, both included in Appendix E-2.

## **HOW FEEDBACK WAS CONSIDERED**

In finalizing this Base Resource Plan element, BC Hydro considered the viability of projects given the market price forecast and the cost of service of clean or renewable facilities with electricity purchase agreements expiring in the next five years. BC Hydro expects that most of these facilities will have a low cost of service for the next 20 years and will be able to operate economically with market-based pricing.

Given BC Hydro's current electricity surplus, offering market-based prices strikes a balance between providing additional certainty to BC Hydro and minimizing cost risks. Renewing electricity purchase agreements allow these lower cost projects to be available and displace more expensive greenfield supply when additional resources would otherwise be needed in the future. At the same time, a market-based priced approach minimizes cost risk to BC Hydro.

For these reasons, BC Hydro is not contemplating offering higher than market-based prices other than adjustments to the price which may be appropriate to reflect certain circumstances such as proximity to load centres.

No changes were made to this Base Resource Plan element between the Draft Integrated Resource Plan and the 2021 IRP.

### ***Responding to Feedback on Electricity Purchase Agreements with Indigenous Ownership***

BC Hydro is aware of three electricity purchase agreements with some form of Indigenous ownership interest and these independent power producers would be eligible to pursue renewal.

Priority renewal of electricity purchase agreements with Indigenous ownership is unnecessary because BC Hydro is offering market-based renewals to all electricity purchase agreements expiring over the next five years, including those projects that have Indigenous ownership.

BC Hydro understands many of the BC First Nations Energy and Mining Council recommendations related to electricity purchase agreement renewals and clean energy development are intended to increase the opportunities for Indigenous involvement in the clean energy sector.

As discussed in section, Response to What We Heard from Indigenous Participants About Matters Outside the Scope of the 2021 IRP, the Indigenous Clean Energy Opportunities engagement process is intended to facilitate an open dialogue between the Province and First Nations to meaningfully explore and develop recommendations for policy, regulatory or program supports to enable greater Indigenous participation in the clean energy sector, including electricity, clean gasses and biofuels.

### ***Addressing feedback on Island Generation***

The 2021 IRP assumes that the contract with Island Generation is not renewed. As the Load Resource Balances demonstrate, Island Generation is not required to meet system planning requirements. This, in addition to considering the greenhouse gas emissions associated with the facility, meant this resource was not included in the Base or Contingency Resource Plans.

In July 2021, BC Hydro detected oil leaks and buckling in the above-ground portions of some of its submarine cables, which extend from the Sunshine Coast to Vancouver Island. Initial repairs have been completed. However, additional work will likely be required over the next two to four years.

BC Hydro expects to take the cables out of service for short periods of time to ensure that the repairs can be completed safely. BC Hydro customers on Vancouver Island will not be impacted by any intermittent cable outages.

BC Hydro is planning on working with Capital Power to determine if the Island Generation facility can provide additional economic back-up capacity and supply in the short-term while the repairs are made. If an agreement is reached, it will be submitted to the BC Utilities Commission for acceptance under section 71 of the *Utilities Commission Act*.

## **Small Plants at or Reaching End-of-Life**

BC Hydro asked participants how the approach to evaluating small generation plants with the proposed timelines aligned with their values and interests, and to state their reasons.

### **PUBLIC AND CUSTOMERS**

Overall, 64% of public survey respondents expressed strong or some alignment with this Base Resource Plan element, 25% stated they were neutral, while 12% indicated little or no support.

Reasons for alignment with this element included that a case-by-case evaluation was a prudent approach, and support for local community and Indigenous Nations engagement. Feedback from participants also indicated they did not have enough knowledge to make an informed decision.

Reasons for non-alignment included participants providing a preference for a specific outcome, such as support for decommissioning, redevelopment, or moving to distributed generation.

## **INDIGENOUS NATIONS**

Indigenous feedback on this Base Resource Plan element of the plan was mainly neutral.

One First Nation was opposed to the timeframe for addressing the future of the Alouette facility. They wanted the future of the facility addressed before or at the time BC Hydro is seeking a renewal of its water license.

The BC First Nations Energy and Mining Council feedback was that it is essential to engage with and fund local and affected First Nations on a case-by-case basis; to seek and follow their suggestions which may include dismantle and restore, or transfer of ownership. BC First Nations Energy and Mining Council believes BC Hydro's structured decision-making process must include engagement with the Indigenous Nations specifically affected by each facility. Nations should have input into decisions and different options should be explored, including economic development and ownership opportunities in redevelopments as well as decommissioning and rehabilitation of the sites. The above comments are set out in the BC First Nations Energy and Mining Council report dated July 31, 2021 and their Technical Advisory Committee submission dated July 2021, both included in Appendix E-2.

## **HOW FEEDBACK WAS CONSIDERED**

Consistent with the overall consultation results described above, this Base Resource Plan element was unchanged between the Draft Integrated Resource Plan and the 2021 IRP.

We are continuing to engage with one First Nation regarding the timing for determining the future of the Alouette facility.

## **Transmission Upgrades**

BC Hydro asked participants how the Base Resource Plan element to advance step one transmission upgrades to the South Coast and prepare for step two aligned with their values and interests, and to state their reasons. This element includes early engagement with potentially affected Indigenous Nations.

## **PUBLIC AND CUSTOMERS**

Overall, 78% of public survey respondents expressed strong or some alignment with this element, while 8% indicated little or no support. The customer survey results were similar.

Participants' reasons for alignment included views that transmission upgrades were necessary, cost-effective, and important to meet growing demand in the South Coast while limiting impacts on the environment. Participants supported the advancement of upgrades instead of new transmission lines.

Participants who were not aligned with this element primarily advocated for investments in local renewable generation sources.

## **INDIGENOUS NATIONS**

Overall, Indigenous feedback was mainly aligned with or neutral on this Base Resource Plan element.

There was very little feedback on this element during discussions at regional workshops and supplemental meetings. There was some positive feedback that this approach limited land and water impacts by using existing infrastructure and right-of-ways. It was also noted that there are ongoing impacts from the existing infrastructure. Some potentially affected Nations indicated the importance of involvement in decision making and of obtaining their consent for future upgrades.

The BC First Nations Energy and Mining Council believes BC Hydro should prioritize future projects that provide ownership and revenue sharing opportunities for Indigenous Nations and limit the potential for new impacts on lands and waters.

BC First Nations Energy and Mining Council states that it is imperative to engage with potentially affected Indigenous Nations and obtain their informed consent. BC Hydro and the Province should also use these opportunities to explore revenue and other benefit sharing whenever new electricity infrastructure is needed.

The above comments are set out in the BC First Nations Energy and Mining Council report dated July 31, 2021 and their Technical Advisory Committee submission dated July 2021, both included in Appendix E-2.

## **HOW FEEDBACK WAS CONSIDERED**

Consistent with the overall consultation results described above, no changes were made to the Base Resource Plan element to advance step one transmission upgrades to the South Coast and prepare for step two.

The Prince George to Terrace Capacitor Project, which is a transmission project that has been ongoing for several years and the subject of extensive consultation, was not included in the Draft Integrated Resource Plan but is included in the 2021 IRP as a Contingency Resource Plan Near-term Action. This change between the Draft Integrated Resource Plan and the 2021 IRP was made as BC Hydro refined the scope of the Near-term Actions. Considering enquiries from the Technical Advisory Committee about when and how BC Hydro may move from the Base Resource Plan to one of the Contingency Resource Plans, BC Hydro re-examined the Near-term Actions to make sure that they allowed BC Hydro to prepare to implement the Contingency Resource Plans, if required. A Near-term Action to advance the Prince George to Terrace Capacitor Project is required to make sure that BC Hydro is prepared to implement the Contingency Resource Plan for the North Coast liquified natural gas and mining scenario.

## **Future Resources**

BC Hydro asked participants how the Base Resource Plan element's approach to future resources aligned with their values and interests, and to state their reasons. This element calls for BC Hydro to plan to acquire new energy and capacity resources starting in fiscal 2031.

## **PUBLIC AND CUSTOMERS**

Overall, 78% of public survey respondents expressed strong or some alignment with this element, while 7% indicated little or no support. The customer survey results were consistent with the public survey results.

Participant feedback focused on the development of new resources, rather than electricity purchase agreement renewals or BC Hydro asset upgrades. Participants supported the development of new renewable power generation, local distributed generation, and incentives for customer-based generation.

Some participants indicated they would like to see BC Hydro advance new resources earlier than 2031, with the view that BC Hydro should be getting ready and that sometimes long lead times are needed for processes to occur, for either distributed resources or for procurement processes.

## **INDIGENOUS NATIONS**

Overall, Indigenous feedback was mainly aligned with or neutral on this Base Resource Plan element.

There were very few comments from the regional workshops directed at this element. However, comments during other parts of the regional workshops and from the first round of consultation indicate there is a strong interest in Indigenous participation in future clean energy project development.

The BC First Nations Energy and Mining Council believes BC Hydro should prioritize future projects that provide ownership and revenue sharing opportunities for Indigenous Nations and limit the potential for new impacts on lands and waters. The above comments are set out in the BC First Nations Energy and Mining Council report dated July 31, 2021 and their Technical Advisory Committee submission dated July 2021, both included in Appendix E-2.

BC Hydro's responses to these interests are found in the section, Response to What We Heard from Indigenous Participants About Matters Outside the Scope of the 2021 IRP, above.

## **HOW FEEDBACK WAS CONSIDERED**

Given the current demand supply outlook, there is time before BC Hydro needs to make a decision on future resources. A deferred decision allows us to retain flexibility and learn more about cost and performance improvements that may occur with future resources.

Given the interest in customer-based generation, BC Hydro analyzed a customer-based combined solar and batteries resource option. As discussed in Chapter 6 of the Application, this resource option was not selected because of economic reasons. It remains a potential component for future resources.

In response to the feedback about the need to be ready for different future outcomes, as discussed in Chapter 8, section 8.2 of the Application, BC Hydro will be monitoring for signposts that indicate changes from our load and resource balances and determine when the development of our next integrated resource plan needs to be initiated.

Consistent with the overall consultation results described above, this element was unchanged between the Draft Integrated Resource Plan and the 2021 IRP.

## Contingency Planning and Utility-Scale Batteries

BC Hydro asked participants how the Contingency Resource Plan element to explore utility-scale batteries in the South Coast aligns with their values and interests, and to state their reasons.

Discussions also occurred with respect to contingency planning generally.

### **PUBLIC AND CUSTOMERS**

Overall, 76% of public survey respondents expressed strong or some alignment with this element, while 5% indicated little or no support.

Reasons for the positive alignment were that utility-scale batteries are an effective way to prepare for different demand scenarios in the future, particularly those where electricity consumption increases.

Those who were not aligned with this element were primarily of the view that batteries may not be the most sustainable solution. Environmental concerns were also expressed regarding their production and disposal. Some favoured other solutions over batteries.

### **INDIGENOUS NATIONS**

Overall Indigenous feedback was mainly aligned with or neutral on this Contingency Resource Plan element.

There was an interest in further exploring the use of battery technology, but there were concerns about the full lifecycle environmental impacts from mining to disposal.

There was an interest in Indigenous economic opportunities associated with utility-scale batteries.

There was also an interest in smaller-scale distributed applications for batteries to provide greater reliability and resiliency for Indigenous communities. There was an interest from some Indigenous participants in piloting battery projects at a community level.

Apart from utility-scale batteries, there was interest from Indigenous participants in low carbon economic development opportunities in the North facilitated by taking a proactive approach to increasing transmission capacity to the North Coast.

### **HOW FEEDBACK WAS CONSIDERED**

Consistent with the overall consultation results described above, no changes were made to the utility-scale battery element between the Draft Integrated Resource Plan and the 2021 IRP.

As appropriate, BC Hydro will engage early with Indigenous Nations and the public that may be potentially affected.

Environmental impacts of batteries will be explored further during future project development.

BC Hydro is including a Near-term Action of advancing the Prince George to Terrace Capacitor Project on the North Coast. This Near-term Action is described in Chapter 8, section 8.3.2.