

Written Submission re YEC LNG proposal

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To: Yukon Utilities Board

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Re: Letter of Comment on YEC LNG Project Application

To the Board:

March 15, 2014

I would like to have the following made part of the public record of the YEC LNG Project review.

There is a need for an accurate net present value case to be made for the project when compared to investing similar public funds in demand shifting to reduce peak loads and in aggressively promoting electrical efficiency and conservation. These techniques when combined with building envelope insulation retrofits and off-peak hours electro-thermal heat storage systems, such as via iron oxide bricks, and a move to time of day metering and billing, would likely free up considerable KWHRS for other tasks than standby to meet peak demand, at a much lower cost to the public purse than the proposed life-cycle costs of the LNG project.

Given the fragility of the Yukon's sparse road network the proponent must demonstrate that, given their proposal, they can continue to deliver power given massive climate change melt events, such as the 2012 Alaska Highway wash-out, which would have prevented delivery of the proposed LNG tankers for at least a week. Weight and balance as well as fugitive emissions issues from LNG tanks preclude their transport by cargo aircraft. Thus, flying LNG tankers over a washed out highway is not possible.

Hard questions have to be asked as to the proponent's choice of site for their proposed

project, which is within 500-600M of the approach threshold for a 747-capable airport, and which is directly underneath the Northern missed-approach route for float aircraft up to Cessna Caravan and turbo-Otter size in terms of aircraft crash fuel loads which could fall on the proposed facility.

Given that current city of Whitehorse fire fighter crew sizes are 2 fire fighters per pumper truck, it falls to the proponent to explain how existing city fire fighting resources would suppress an aircraft crash fire at the proposed LNG facility, and how such existing fire fighters would evacuate the roughly 5000 people living in Riverdale within a 2km evacuation zone from the proposed LNG plant, over a single two-lane bridge, in a timely manner.

The proponent also needs to demonstrate the life-cycle length training system they will put into place to produce appropriate numbers of high-pressure certified welders and other certified pressurized gas handling equipment specialists in a territory which struggles to train and certify domestic heating system specialists, and in which a major propane distributor has recently been convicted and fined for using un-certified staff.

Given these risks to the public purse, and to public safety, I urge the Board to regard the LNG proposal within a much wider perspective, that of how the regulated utility may best deliver the objective of stable power and warm homes to its power users, be that through the freeing up of currently wasted KWHRs by energy efficiency and conservation measures, shifting demand off peak hours, or that of alternatives to LNG generation, such as wind, solar and geothermal, the latter being particularly adapted to space heating.

Sincerely,
Paul Davis