LAWSON LUNDELL LLP

BARRISTERS & SOLICITORS

# ENERGY LAW NEWSLETTER

Summer 2005

WESTERN CANADIAN BUSINESS LAW

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## INTRODUCTION

Welcome to Lawson Lundell LLP's energy law newsletter. This quarterly publication is dedicated to keeping readers informed about developments in the energy sector in Western Canada. For more information about the articles in this newsletter please contact Jeff Christian at 604-631-9115. For more information about Lawson Lundell LLP's energy law practice please contact Chris Sanderson at 604-631-9183. Back copies of this newsletter may be found on our web-site at www.lawsonlundell.com in the Energy Law Practice Group section.

## REGIONAL

### NEB Renews Commitment to Goal-Oriented Regulation

At its annual workshop held in Calgary from June 6 to 8, 2005, the National Energy Board (NEB) pledged its commitment to goal-oriented regulation as a key priority for the regulator in the coming years. Seeking to align itself with the Federal Government's Smart Regulation initiative and to reduce the administrative burden on business, the NEB is looking to implement a style of regulation that identifies and focuses on outcomes, rather than prescribing the means by which specific results must be achieved. Goal-oriented regulation uses a mix of goal-based, performance–based and prescriptive components to create a regulatory framework that allows increased flexibility for regulated companies to manage risks and adapt to changing conditions. Non-legislative industry standards, codes of practice and Guidance Notes will continue to offer documented representation of acceptable methods.

### Mackenzie Gas Projects – Update

On April 28, 2005, Imperial Oil, on behalf of the Mackenzie Gas Project co-venturers, announced a decision to halt "project execution activities" – citing insufficient progress on the finalization of benefits and access agreements and the establishment of a clear regulatory process. Imperial indicated that substantial progress would have to be made in these two areas before it would be ready to proceed to public hearings. However, the proponents continued all work associated with advancing the regulatory review processes before the NEB and the Joint Review Panel (JRP), which is conducting an environmental and socio-economic review of the project.

The preliminary phases of the NEB regulatory review are largely complete. The only remaining preliminary step before the applications are ready for the public hearing phase of review is for the proponents to file reply evidence, which was due on July 28, 2005. On July 13, 2005, in response to an enquiry from the NEB, the proponents stated that there are still a number of outstanding issues that need to be resolved prior to advancing to the public hearing stage of the NEB regulatory process, which makes it unlikely that any NEB hearing will start before November 2005.

On July 18, 2005, the JRP, following an Environmental Impact Statement conference convened in Yellowknife, Northwest Territories on June 26 -29, 2005, announced that it had determined that there is sufficient information to proceed to the public hearing phase of its review, subject to certain information being filed by late September 2005. This also means that the JRP will not be in a position to start a public hearing before November 2005.

## ALBERTA

### AEUB Finds Calgary-Area Critical Sour Gas Project Can be Done Safely

On June 22, 2005, the Alberta Energy and Utilities Board (AEUB) issued Decision 2005-060 conditionally approving Compton Petroleum Corporation's (Compton) application for licences to drill six critical sour gas wells from a single well pad located 1.1 km east of the Calgary city limits. The Board agreed with Compton that it was possible to safely drill and complete four of the six proposed wells, and confirmed that if Compton can gain the Board's approval of its Emergency Response Plan which is currently incomplete, the Board would issue licences for the four wells. As previously reported in our newsletter, Compton had also applied for a reduction to the Emergency Planning Zone (EPZ) for both the drilling and completion operations, seeking to reduce the EPZ from 12 km and 15 km respectively (based on calculated hydrogen sulphide release rates) to 4 km. Deciding that a 4 km EPZ was not sufficiently protective of public safety, the Board directed Compton to use an EPZ of 9.7 km, composed of an evacuation zone of 5 km and a sheltering zone of 4.7 km. Compton was also directed to use an Awareness zone of 15 km (EAZ). Declaring to have adopted a particularly cautious approach given the proximity of the proposed wells to densely populated areas, the Board imposed 14 further conditions, including requirements to conduct a major ERP deployment exercise prior to entering the first sour zone, and to abandon the wells within a specified period.

Compton has until August 15, 2005, to advise the Board whether it intends to proceed with updating the deficient ERP. If so, it will have until November 1, 2005, to complete the revised ERP following appropriate consultation with all affected parties. The Calgary Health Region, an intervener in the proceeding, has applied to the Alberta Court of Appeal for leave to appeal the Board's Decision on the basis that the Board failed to consider site-specific health risks in making its decision. The future South Calgary Hospital, scheduled for completion in 2010, is located within the Board-designated EPZ and EAZ.

### Alberta Court of Appeal Confirms AEUB Test for Prudence

The Alberta Court of Appeal recently confirmed the test for prudence applied by the AEUB in assessing the managerial decisions of a public utility. ATCO Gas and Pipelines Ltd. (ATCO) sought to appeal the AEUB's 2001 decision that ATCO acted imprudently in managing its gas supplies for the winter of 2000/2001 when it decided to switch withdrawal strategies out of the Carbon gas storage facility from a flexible to a flat withdrawal strategy. ATCO was ordered to pay $4 million to its customers to compensate them for missed cost savings. ATCO appealed this decision to the Court. In *ATCO Gas and Pipelines Ltd. v. Alberta (Energy and Utilities Board)*, 2005 ABCA 122 issued March 29, 2005, the Court confirmed the prudence test set by the Board, and clarified that the Board's application of that test is not reviewable. A utility will be found prudent if it exercises good judgment and makes decisions which are reasonable at the time they are made, based on information the owner of the utility knew or ought to have known at the time the decision was made. Although entitled to a fair return, a utility must take into account the best interests of its customers when making decisions. Agreeing that the appropriate standard of prudence is not what a reasonable businessman would have done in the circumstances but rather what a reasonable public utility would have done, the Court concluded that the Board properly acknowledged the presumption of managerial prudence when it decided to uphold ATCO's decision unless it was satisfied that ATCO had acted unreasonably. Having been satisfied that the change in withdrawal strategy was unreasonable, the Board properly ordered the utility to compensate its customers for cost savings lost as a result of the imprudent conduct.

## BRITISH COLUMBIA

### BC Court of Appeal Confirms Actionable Duty of Good Faith on Public Utilities

In *Princeton Light & Power Co. Ltd. v. Macdonald*, 2005 BCCA 296, the BC Court of Appeal recognized an actionable common law duty of good faith and fair dealing of a public utility towards its customers.

In *Princeton*, M. was charged by the public utility, Princeton Light & Power Co. Ltd. (Princeton Light), for unauthorized use of electric power on a property that he owned and rented out to tenants. A tenant rented the property for approximately three years from June 1996 to March 1999. A second tenant took possession at that point to June 1999, at which time the RCMP found a marijuana grow-op on the property and a power bypass ahead of the electricity meter, and arrested the second tenant for cultivating marijuana.

Princeton Light disconnected electrical service to the property shortly thereafter, and would only re-connect upon receipt from M. of $18,546.01 (the amount Princeton Light concluded it was owed for the unauthorized use). Princeton Light calculated this amount by projecting three months of stolen power (during the term of the second tenancy) backwards three years to the beginning of the first tenancy. Princeton Light justified the nearly three and a half years of back billing on the grounds that its meter readers had from time to time noted a marijuana smell during the course of the first tenancy, and because meter readings during the first tenancy allegedly showed a "drastic change" from previous usage. Both grounds were challenged at trial and found to be unreasonable.

In December 1999, with the onset of winter, M. applied to the B.C. Utilities Commission (Commission) for a reconnection order pending resolution of back-billing dispute. The Commission rejected the application, finding that the utility had acted in accordance with its filed Tariff.

Without electricity, M. was unable to rent the premises, and without the rental income he could not pay the back-bill. M. was unable to make his mortgage and tax payments, the bank brought foreclosure proceedings, and the property was sold in 2001.

At trial, the jury dismissed Princeton Light's action to enforce its back-bill, and found Princeton Light had no reasonable grounds to believe the unauthorized use of power had begun before March 1999 and that M. had been treated in bad faith. The jury awarded M. $19,672.61 as compensatory damages and $62,000 as punitive damages. The B.C. Court of Appeal upheld the decision.

The *Princeton* decision determined two issues. First, the Commission did not have exclusive jurisdiction to determine the factual question of whether the grounds relied upon by the utility to justify the period of back-billing were reasonable. Second, public utilities can be held liable for punitive damages if they breach the duty of good faith and fair dealing to customers implied in standard form service agreements. Nothing in the Tariff gives rise to this duty; it is a common law cause of action. The Court of Appeal found that the over-billing was accompanied by unfounded allegations of participation in or covering up of criminal behaviour, and that the large amount of punitive damages was justified because of what it viewed as "arbitrary, callous and oppressive conduct by a monopolistic public utility providing an essential service in a regulated industry."

### BC Hydro Terminates Duke Point EPA

The long-running effort to construct a natural gas thermal generation plant on Vancouver Island, first at Port Alberni and, for the last three years, at Duke Point near Nanaimo, appears to have ended. As previously reported, an Electricity Purchase Agreement (EPA) between BC Hydro and Duke Point Power (DPP) was accepted for filing by the B.C. Utilities Commission on February 17, 2005, after a contentious hearing in January and February of this year. Leave to appeal the Commission's decision was sought by the Joint Industry Electricity Steering Committee (JIESC) and a group of environmental NGOs on numerous procedural and substantive grounds. The leave application was dismissed on all grounds by Mr. Justice Thackray sitting in Court of Appeal Chambers. The would-be appellants then sought reconsideration of Mr. Justice Thackray's decision on three of these grounds and, on

June 13, 2005, persuaded two of the three presiding judges to grant leave on one ground of appeal involving the treatment of confidential information filed with the Commission.

Subsequent to the Court of Appeal's decision, BC Hydro announced that in light of the ongoing delays associated with the project, it had exercised its rights under an Extension Agreement with respect to the original EPA to terminate the contract.

Since BC Hydro announced its decision, DPP has asked the Commission to inquire into the basis for BC Hydro's decision and to determine whether plans exist to reliably serve Vancouver Island. Meanwhile, BC Hydro has indicated that it is seeking short-term measures to resolve potential capacity shortfalls on Vancouver Island in the near term and is issuing a larger than anticipated call for energy on a province-wide basis to deal with, amongst other things, the loss of the potential power from the DPP project. While all of the dust from the efforts to construct new generation on Vancouver Island may not yet have settled, it seems clear that BC Hydro's efforts to construct or purchase from a major gas thermal plant on the Island have come to an end.

## NUNAVUT

### Government of Nunavut Approves General Rate Increase

The Government of Nunavut has accepted the Utilities Rate Review Council's (Council) report and recommendations on the Qulliq Energy Corporation's (Qulliq) General Rate Application filed on September 28, 2004. In doing so, Qulliq's request to move away from community based cost of service rates and towards territory-wide postage stamp rates was rejected. Effective April 1, 2005, all existing rates increased by 16.5%. Prior to April 1, 2005, the rates had been based on the 1997/98 operating and capital expenditure allocations included within the Northwest Territories Power Corporation cost of service study. The community based rate structure requires some communities to pay significantly higher rates than other communities.

As part of its acceptance of the rate increase, the Government of Nunavut has agreed to provide $22 million to Qulliq in subsidies. Despite the rate increase and government subsidies, Qulliq is still left with insufficient revenue to fund capital expenditures.

In order to address its shortage of funds for capital expenditures, Qulliq submitted a Capital Stabilization Fund Application to Council for consideration in May 2005. This application, if approved, would allow Qulliq to temporarily apply a capital stabilization rider of between 5.648¢ and 7.04¢ per kWh per consumer. The capital stabilization rider is designed as an interim measure to respond to the need, as identified by the Council, to rebalance and stabilize the portion of rates derived from capital expenditures. The Council is accepting written submissions on the proposed capital stabilization rider until August 2005.

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# Feature Article: Meeting Greenhouse Gas Emissions Reduction Targets

## Introduction

As discussed in our April 2005 newsletter, the Kyoto Protocol (the "Protocol") to the United Nations Framework Convention on Climate Change ("UNFCCC") came into force on February 16, 2005. The federal government's steps towards the implementation of Canada's Protocol commitments include national greenhouse gas ("GHG") emission reporting requirements applicable to major industrial emitters[1] and a new federal plan for implementation of the Protocol[2].

The federal government's implementation plan, "Moving Forward on Climate Change: A Plan for Honouring our Kyoto Commitment," outlines a new emissions reduction plan for large emitters, including companies in the mining, manufacturing, oil and gas, and thermal electricity sectors (known as "large final emitters" or "LFEs"). The federal government also plans to implement systems by which individuals or organizations that reduce or sequester emissions may apply to a government body for offset credits that may be used in achieving the emissions reduction or limitation requirements that the Canadian government may require from LFEs in the future.

A Notice of Intent to Regulate Greenhouse Gas Emissions by Large Final Emitters (LFEs) was published on July 15, 2005, in the Canada Gazette, Part I, outlining how emission-reduction targets would be set, the mechanisms through which LFEs could meet their targets and the preferred regulatory option for implementing the system, under the Canadian Environmental Protection Act, 1999 (CEPA 1999). The LFE system will establish clear emission-reduction targets and give industry multiple avenues for meeting their target, including through contributions to a new Technology Investment Fund established in Budget 2005. Companies that have surplus emission reductions may sell them to other companies or to the Climate Fund. This approach provides a financial incentive for companies to exceed their targets.

In this article we discuss the methods by which a Party to the Protocol may obtain offset credits and how Canadian companies may be able to use flexibility mechanisms to manage their own GHG expected emission reduction requirements and to participate in related investment opportunities.

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[1] See our April 2004 newsletter, "New Canada-Wide Greenhouse Gas Emission Reporting Requirements.", available on our website at www.lawsonlundell.com in the Environmental Law Practice Section.

[2] See our May 2005 Special Edition: Environmental & Energy Law Newsletter, "New Federal Plan for Kyoto Commitment Implementation.", available on our website at www.lawsonlundell.com in the Environmental Law Practice Section.

## The UNFCC and the Protocol

Signatories to the UNFCCC are categorized as Annex I, Annex II, and Non-Annex I Parties. Annex I Parties, of which there are currently 41[3], include the industrialized countries that belonged to the Organisation for Economic Co-operation and Development in 1992, as well as countries with economies in transition ("EIT Parties"), such as the Russian Federation, the Baltic States, and Central and Eastern European States.

Annex II Parties include only the OECD members of Annex I. The UNFCCC imposes additional obligations on Annex II Parties. They are required to financially assist developing countries in undertaking emissions reduction measures, and to promote the development and transfer of environmentally friendly technologies to EIT Parties and developing countries. Canada is an Annex I and an Annex II Party.

Non-Annex I Parties include developing countries. There are currently 148 Non-Annex I Parties to the UNFCCC. These Parties receive special consideration under the UNFCCC to reflect their limited capacity to implement climate change prevention and reduction mechanisms.

The Protocol reinforces the UNFCCC by creating individual, legally-binding emissions reduction or limitation targets for Annex I Parties. These individual targets are listed in Annex B to the Protocol. UNFCCC Parties are bound by these targets only if they have also become Parties to the Protocol. In achieving these targets, Annex I Parties may utilize the mechanisms discussed in this article.

## Flexibility Mechanisms

The Protocol creates a number of mechanisms that Parties to the Protocol, e.g. Canada, may use to offset their emissions in order to comply with their Protocol obligations. These mechanisms include:

- carbon sinks (increasing the amount of GHGs removed from the atmosphere in the land use, land use change and forestry ("LULUCF") sectors);
- joint implementation;
- clean development mechanism; and
- emissions trading.

These "flexibility mechanisms" are designed to help Parties reduce the costs of achieving their emissions reduction targets. The mechanisms permit Parties to achieve their targets by reducing either emissions or existing atmospheric GHGs in countries other than Canada, where implementation costs may be considerably less. However, Parties may only use the flexibility mechanisms to supplement domestic action;

[3] U.S. is included in Annex I and II to the UNFCCC, but is not a signatory to the Kyoto Protocol.

a significant portion of their efforts must still be concentrated on reducing emissions in their home territory. In addition, users of the mechanisms must comply with the procedures and reporting obligations created by the UNFCCC and the Protocol.

The mechanisms are not equally available to all Parties; their availability depends on a Party's classification under the UNFCCC. Projects under each type of mechanism give rise to distinct types of carbon credits, which are traded separately in emissions trading exchanges.

## Carbon Sinks

Carbon "sinks" operate to remove GHGs from the atmosphere. For example, forests are carbon sinks because, during their growth period, they remove more carbon dioxide from the atmosphere than they produce. The Protocol permits Annex I Parties to earn "removal units" ("RMUs") by undertaking sink-enhancing activities, such as increasing areas of forested land. Sink-enhancing activities may be implemented for credit as part of clean development or joint implementation projects, and the RMUs generated will be tradable.

Eligible sink-enhancing activities include afforestation, reforestation, and reductions in deforestation (e.g., harvesting reductions). Afforestation involves the creation of forest where none previously existed, while reforestation involves the replacement of previously existing forest. Cropland management, grazing land management and revegetation activities may also generate credits if they reduce GHG production or increase GHG removal from the atmosphere.

Only net removals resulting from sink activities can be counted, and Parties are subject to individual caps as to the amount of credit that can be claimed through forest management. It will likely be more difficult to obtain credits through sink-enhancing activities than through other mechanisms, since sink-enhancement projects are considered to be less reliable than other types of projects; for example, if a forest burns down, greenhouse gases will be unintentionally re-released into the atmosphere. As well, it may be difficult to calculate the results of sink activities.

## Joint Implementation

The joint implementation mechanism provides that an Annex I Party may receive credit for implementing a project that reduces emissions or removes existing atmospheric GHGs in the territory of another Annex I Party. The Annex I Party implementing the project can apply the emission reduction units ("ERUs") or RMUs generated by the project in calculating its own target.

Most joint implementation projects will likely be employed by developed Annex I countries in Annex I countries with economies in transition, where such projects are likely to be implemented at low cost. An example of an eligible emission-reducing activity would be an energy efficiency project. A reforestation project in another Annex I country could generate RMUs.

## Clean Development Mechanism

This mechanism, described in Article 12 of the Protocol, permits Annex I Parties to achieve certified emission reductions ("CERs") by implementing emission-reduction or GHG-removal projects in non-Annex I Party territories. CERs obtained through Clean Development Mechanism activities may be applied as credits in calculating the implementing Party's emissions. To generate credits, a project must be voluntary and approved by all involved parties, and it must produce real, measurable, long-term benefits that would not have existed in the absence of the project.

An example of a project that has been implemented by a Canadian company for credit under the Clean Development Mechanism is a methane capture and combustion treatment project in Chile. This project involves the treatment of swine manure to reduce methane release into the atmosphere. A Japanese company is also involved in the project.

A project being implemented under the Clean Development Mechanism in Honduras involves the construction of a small-scale hydroelectric plant. This project consists of two power stations located 1 km apart on two separate rivers; the stations have a total installed capacity of 8.6 MW and an estimated annual generation of 50.63 GWh. The objective is to reduce GHG emissions by generating electrical power to replace equivalent fossil fuel power production.

## Emissions Trading

This mechanism, addressed in Article 17 of the Protocol, allows Annex I Parties to acquire "units" from, or sell them to, other Annex I Parties. Units that may be acquired include RMUs, ERUs, CERs, assigned amount units ("AAUs")[4], temporary CERs ("tCERs"), and long-term CERs ("lCERs"); these accounting units are applied as credits when calculating a Party's success in meeting its emissions targets. Each unit is the equivalent of one metric tonne of $CO_2$ emissions.

[4] AAUs are an assigned quota for each Annex B country and no further AAUs can be created. All Kyoto credits (CERs, ERVs, RMUs) are project-based and can only be issued after reductions have been verified. Lawson Lundell can provide advice on the relative risks and contract provisions to minimize risks from each type of carbon credit.

Securities exchanges are already handling carbon trading; the European Climate Exchange, for example, has been in operation since January 2005. It is now a wholly-owned subsidiary of the Chicago Climate Exchange, which in turn is owned by the Climate Exchange, based in the Isle of Man.

## Opportunities for Canadian Companies

A variety of opportunities exist for Canadian companies to take advantage of these mechanisms as offsets against their future GHG emission reduction requirements or as investment opportunities. Hydroelectric and waste treatment plants have already been discussed, and there are also numerous other types of projects in which a Canadian company may participate and for which it may acquire emissions reduction units. For example, in Brazil, a proposal has been submitted for a landfill project that will reduce GHG emissions by collecting and flaring the methane gas produced at each of several landfill sites. The project is also intended to reduce emissions attributable to the displacement of grid electricity. The achievement of these goals requires the implementation of gas collection and leachate drainage systems; it also requires the development of a modular electricity generation plant and a generator compound at each landfill site.

Regardless of the project activity involved, a project participant must follow mandatory proposal and approval procedures in order to qualify for reduction credits. For example, to acquire emissions reduction credits for implementing a Clean Development Mechanism project activity, the procedure is as follows:

- In the project activity design phase, project participants must submit a standardized "project design document" containing specific information about the proposed activity. If the participants are proposing to use new instead of "approved" methodologies, further documentation must be submitted to the Executive Board, again in a standardized format; this documentation will be made publicly available for review and comment.

  If participants use an "approved methodology," they may proceed with the validation of the CDM project activity and submit the project design document for registration. An approved methodology is one that has previously been approved by the Executive Board.

- Validation, the next step, involves the independent evaluation by a designated operational entity ("DOE") of a project activity, based on the project design document, to determine if it meets the requirements set out in various policy documents. A DOE is an entity designated by the Conference of the Parties as qualified to validate proposed CDM project activities and to verify and certify GHG emissions reductions.

- Once a project activity has been validated, it must be registered. Registration involves the formal acceptance by the Executive Board of a validated project as a Clean Development Mechanism project activity. Without registration, a project may not be verified or certified and CERs may not be issued with respect to that project activity. To obtain registration, the "designated operational entity" must submit an activity registration form and pay a registration fee.

- Verification / certification is the final step in the approval of a CDM project activity. Verification involves periodic independent review and determination by the DOE of GHG emissions reductions that have occurred as a result of a registered project activity. Certification occurs when the DOE provides written assurance that, during a specific time period, a project activity achieved those emissions reductions determined in the verification phase.

The starting date for a CDM project activity is the date on which implementation of a project activity begins or construction associated with the project activity starts.

While project participants will likely provide private funding for many projects, funds created pursuant to Canadian emissions reduction legislation[5] are also intended to provide subsidies for the implementation of approved project activities. Companies that have surplus emission reductions may sell them to other companies, to the Climate Fund, or trade them in the carbon market.

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[5] *Greenhouse Gas Technology Investment Fund Act* (Canada; not yet in force); *Canada Emission Reduction Incentives Agency Act* (Canada; not yet in force); these funding mechanisms are briefly described in our May 2005 newsletter "New Federal Plan for Kyoto Commitment Implementation."

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