

Vancouver

26-Mar-18

REGISTRY

This is the 1st affidavit
of M. Durivage in this case and was
made on March 13, 2018

No. S174308
Vancouver Registry

IN THE SUPREME COURT OF BRITISH COLUMBIA

BETWEEN:

INDUSTRIAL ALLIANCE INSURANCE AND FINANCIAL
SERVICES INC.

PLAINTIFF

AND:

WEDGEMOUNT POWER LIMITED PARTNERSHIP
WEDGEMOUNT POWER (GP) INC.,
WEDGEMOUNT POWER INC.
THE EHRHARDT 2011 FAMILY TRUST
POINTS WEST HYDRO POWER LIMITED PARTNERSHIP
by its general partner POINTS WEST HYDRO (GP) INC.
CALAVIA HOLDINGS LTD.
SWAHEALY HOLDINGS LIMITED
BRENT ALLAN HARDY
DAVID JOHN EHRHARDT
28165 YUKON INC.
PARADISE INVESTMENT TRUST
SUNNY PARADISE INC.

DEFENDANTS

AFFIDAVIT

I, MAXIME DURIVAGE, of 1080 Grande Allée West, Quebec City, Quebec G1K 7M3
SWEAR THAT:

1. I am the Director, Private Placements working for the Plaintiff, Industrial Alliance Insurance and Financial Services Inc. ("IA"), and as such, have personal knowledge of the facts and matters hereinafter deposed to, save and except where the same are stated to be based on information and belief, and where so stated I verily believe them to be true.

2. I have read the Affidavit of Bruce Chow made January 19, 2018 (the "**Chow Affidavit**"), the Affidavit of Melinda McKie (the "**McKie Affidavit**"), the Affidavit of Paul Chambers (the

"Chambers Affidavit"), the Affidavit of Michael Potyok (the "Potyok Affidavit"), the Affidavit #2 of Luc Fournier (the "Fournier Affidavit"), and the Affidavit of Stefanie Leduc (the "Leduc Affidavit") sworn in this matter. I have adopted the capitalized terms used in the Fournier Affidavit.

3. Paragraphs 3 through 12 of the Fournier Affidavit accurately set out the background facts of this matter.

4. On June 14, 2017, I attended a meeting between IA and BCH to discuss the Project following the appointment of the Receiver. Vic Rempel, Ryan Hefflick, Olha Lui and Joanne McKenna attended the meeting on behalf of BCH. I attended on behalf of IA along with Luc Fournier and Stéfanie Leduc. I understood that Olha Lui and Joanne McKenna represented the BCH department responsible for EPAs. During this meeting, Olha Lui informed us that IA should not worry about the EPA remaining valid even if the COD was not achieved by September 30, 2017. Olha Lui explained that the time did not start until the facility study was finalized. Paragraph 4 of the Leduc Affidavit accurately reflects my memory and understanding of that meeting.

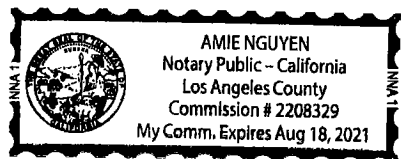
SWORN BEFORE ME at the City of)
Los Angeles, in the State of California,)
this 13 day of March, 2018.)

Amie Nguyen)
A Notary Public in and for State of)
California.)

My commission expires: 8/18/2021)

I attach here my official seal:)

Maxime Durivage)
MAXIME DURIVAGE)



No. S174308
Vancouver Registry

IN THE SUPREME COURT OF BRITISH COLUMBIA

BETWEEN:

INDUSTRIAL ALLIANCE INSURANCE AND FINANCIAL
SERVICES INC.

PLAINTIFF

AND:

WEDGEMOUNT POWER LIMITED PARTNERSHIP
WEDGEMOUNT POWER (GP) INC.
WEDGEMOUNT POWER INC.
THE EHRHARDT 2011 FAMILY TRUST
POINTS WEST HYDRO POWER LIMITED PARTNERSHIP by
its general partner POINTS WEST HYDRO (GP) INC.
CALAVIA HOLDINGS LTD.
SWAHEALY HOLDING LIMITED
BRENT ALLAN HARDY
DAVID JOHN EHRHARDT
28165 YUKON INC.
PARADISE INVESTMENT TRUST
SUNNY PARADISE INC.

DEFENDANTS

AFFIDAVIT

GOWLING WLG (CANADA) LLP
Barristers & Solicitors
Suite 2300, 550 Burrard Street
Vancouver, BC V6C 2B5

Tel. No. 604.683.6498
Fax No. 604.683.3558

File No. L67090009

DS