



This is the 1<sup>st</sup> affidavit  
of P. Chambers in this case and was  
made on March 13<sup>th</sup>, 2018

NO. S-174308  
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**

I, Paul Chambers, of 2800 - 1055 Dunsmuir Street, Vancouver, British Columbia, V7X 1P4  
SWEAR THAT:

1. I am a Vice President of Deloitte Restructuring Inc. ("**Deloitte**" or the "**Receiver**"), the court appointed Receiver and Manager of Wedgemount Power Limited Partnership ("**Wedgemount LP**"), Wedgemount Power (GP) Inc. ("**Wedgemount GP**"), and Wedgemount Power Inc. (collectively, the "**Wedgemount Entities**") 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 am authorized to swear this Affidavit on behalf of the Receiver.

3. I have read the Affidavit of Bruce Chow made January 19, 2018 (the "**Chow Affidavit**") and the Affidavit of Melinda McKie (the "**McKie Affidavit**") sworn in this matter. I have adopted the capitalized terms used in the McKie Affidavit, unless otherwise defined herein.

### **Receivership**

4. To the best of my knowledge, the McKie Affidavit is accurate in all respects. I make this affidavit to provide some further comments on some of the meetings, calls and correspondence mentioned in the McKie Affidavit and to outline a few other matters.

5. On May 18, 2017, I was on the initial call which took place between the Receiver and BCH representatives. This call is referred to in paragraph 9 of the Chow Affidavit and paragraphs 10 and 11 of the McKie Affidavit. I do not recall Mr. Chow being on that call. The McKie Affidavit provides an accurate description of what took place on that call.

6. I attended the June 6 Meeting with BCH representatives Mr. Hefflick and Mr. Rempel, together with Ms. McKie and the Receiver's engineering consultant, Michael Potyok of Midgard Consulting Inc. Paragraphs 15-19 of the McKie Affidavit accurately reflect what took place at the June 6 Meeting.

7. Attached hereto as **Exhibit "A"** is a copy of my contemporaneous notes of the June 6 Meeting (the "**June 6 Meeting Notes**"). The June 6 Meeting Notes are dated June 5, 2017 due to the fact that I dated the notes by reference to the date on my watch, which incorrectly stated that the date was June 5, 2017 on the morning of June 6, 2017. However, I can confirm that the June 6 Meeting Notes are in fact notes of the June 6 Meeting.

8. I specifically recall Mr. Hefflick and Mr. Rempel advising the Receiver that because the Draft Interconnection Study Report was only in draft form there was no Target COD set and consequently there was no COD deadline of September 30, 2017 for the Receiver

to be concerned about. This is reflected on page 3 of the June 6 Meeting Notes, where I recorded that "EPA tied to finalizing of facilities study. Still in draft, so not kicked in." That approach was consistent with the Receiver's view of the EPA terms.

9. I also recall that Mr. Hefflick and Mr. Rempel indicated that achieving COD by the end of the summer of 2017 may be challenging from BCH's perspective. In particular, they mentioned that BCH has certain interconnection design review and approval processes that take time to complete. They also expressed concern that it may be difficult for BCH to engage a contractor to construct the distribution line within this timeframe once the interconnection route and engineering design had been fully determined. Further, since the construction would likely take place during the summer, BCH raised concerns about the roads near the Project being busy which would potentially cause problems if road closures would be required to get the work completed. BCH indicated that all of these issues, in addition to prospective permitting timelines, would potentially make a COD in the late summer of 2017 challenging.

10. I also attended the June 15 Meeting to discuss the Project. Paragraphs 20 and 21 of the McKie Affidavit accurately reflect what took place at the June 15 Meeting.

11. In reliance upon the BCH representations at the June 6 Meeting, the representations I was aware of which BCH had made to IA, the Receiver's understanding of the EPA terms, and the fact that BCH was actively working with the Receiver to advance the Project, I had no reason to believe that BCH would attempt to terminate the EPA.


12. As a result, I was surprised when I received a voicemail and an email from Ms. McKenna on September 19, 2017, advising me that she was not at that time able to provide the Receiver with the assurances with respect to the EPA that the Receiver had sought in its email dated September 11, 2017 (attached as Exhibit E to the McKie Affidavit), as she was waiting for information that she expected to receive on September 20, 2017. Attached hereto as **Exhibit "B"** is a copy of the email dated September 19, 2017 that I received from Ms. McKenna.


13. On October 13, 2017, the Receiver provided BCH with updated (95%) design drawings for the interconnection distribution line and point of interconnection following the FSR Route for BCH's review. Attached hereto as **Exhibit "C"** is a copy of the email I sent to Mr. Rempel, with a copy to Mr. Chow and Ms McKenna (among others), dated October 13, 2017.

14. In the fall of 2017, well after September 30, 2017, the Receiver and its engineering consultants continued to work with BCH to advance the interconnection engineering design. For example, on October 27, 2017, Mr. Acharya of BCH provided feedback and comments on the drawings that the Receiver had provided to BCH on October 13, 2017, and requested that the Receiver's engineering consultant, Clean Energy Consulting Inc., address BCH's comments and notify BCH before the design was finalized for work order. Attached hereto as **Exhibit "D"** is a copy of the email dated October 27, 2017 received from Mr. Acharya by Matthew Obee of Clean Energy Consulting Inc. and subsequently forwarded to me on the same day.

15. I attended the meetings on September 25, 2017, October 6, 2017 and November 20, 2017 which the Receiver had with BCH. The McKie Affidavit accurately sets out what took place at those meetings. During those meetings, I had no sense from BCH that it would attempt to terminate the EPA altogether, but rather it appeared that BCH might try to negotiate an amendment of the EPA. Given all the progress made in advancing the Project and based on all the correspondence and meetings with BCH since the Receiver's appointment, I was surprised when Ms. McKenna indicated for the first time, on the January 19, 2018 call she had with Ms McKie and I, that BCH was seeking leave to terminate the EPA for the Project altogether.

SWORN BEFORE ME at the City of  
Vancouver, British Columbia, this 13<sup>th</sup> day  
of March, 2018.

  
A Commissioner for Affidavits in and for  
the Province of British Columbia

  
\_\_\_\_\_  
**PAUL CHAMBERS**

**DOMINICA A. DAVIS**  
*A Commissioner for Taking Affidavits  
Within the Province of British Columbia*  
Suite 2800 - 1055 Dunsmuir Street  
Vancouver, B.C. V7X 1P4  
Appointment Expires: November 30, 2019

/

The attached is Exhibit "A"  
referred to in the affidavit #1  
of Paul Chambers sworn before  
me at VANCOUVER, British Columbia.  
this 13<sup>th</sup> day of MARCH, 2018



\_\_\_\_\_  
A Commissioner for taking Affidavits in  
the Province of British Columbia

BL 10000

Jan 5, 2017

Vic + Ryan

Comm Op. Date (COD) - all req. met per EPA.

In Service Date -> ready to receive power

ISA -> 2 wire to Inverter -> COD.

↓  
Commissioning  
Process.

↳ from EPA  
group

Substation, field work

DGA = Interim Agreements.

Nothing to present. Indentify IA

- ① scope of work
- ② financial commitment

Facilities Study completed Dec 2016 (ASCT)

cost estimate sign. higher

scope of work changes

underground crossings of Hwy 99 - concern  
Poi

Timelines for permitting issue  
show WRP to take that risk

BEH section ready to go, selected ready to go  
SLAD route - tenure issues

- ① confirmation from developer.  
to secure private line whichever route that is
- ② scope of work agreeable.

Issued for construction drawing  
Then use to lobby.

SLAD discussions going well, then didn't  
Peter Zell: not finalized to his satisfaction  
Rd option in infancy of design.  
10 yr tenure with belt buckle - ~~road~~ way work  
2 yr job won't work.

interview, properties, EPA.

Good conversations to have with Obbel (renew energy)

- ① IFC
- ② Zook + GBT.

- reserves
- contract
- load closure
- prop dead date

can identify schedule once name drawings.

confirm Sept -> forward P. Study -> OGA -> Hunt -> Electr.

EPA tied to knowledge of facilities study  
not in draft, so not kicked in.

L.C. Brent Handys \$347k, Westwood Power  
PBC requested to release 465 Ltd.  
Equity contribution  
Active until Aug 2012.

⊕ direction to Hydro re: letter of credit



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The attached is Exhibit "B"  
referred to in the affidavit #1  
of Paul Chambers sworn before  
me at VANCOUVER British Columbia.  
this 13<sup>TH</sup> day of MARCH, 2018



\_\_\_\_\_  
A Commissioner for taking Affidavits in  
the Province of British Columbia

**From:** McKenna, Joanne <Joanne.McKenna@bchydro.com>  
**Sent:** September-19-17 11:44 AM  
**To:** Chambers, Paul (CA - British Columbia)  
**Cc:** McKie, Melinda (CA - British Columbia); Hefflick, Ryan; Rempel, Vic; Magnus C. Verbrugge (mverbrugge@blg.com); McKenna, Joanne  
**Subject:** RE: Wedgemount Power LP in Receivership

Hi Paul, as per my voicemail, we are currently waiting on information that I expect to receive tomorrow afternoon. I will call you as soon as I have it. At this time, I can't provide you with the assurances that you are seeking.

Joanne

---

**Joanne McKenna** | Sr. Manager, Distributed Generation, Business & Economic Development

**BC Hydro**  
 333 Dunsmuir St, 17th floor  
 Vancouver, BC V6B 5R3

**P** 604-623-4162  
**M** 604-505-7413  
**E** [Joanne.McKenna@bchydro.com](mailto:Joanne.McKenna@bchydro.com)

[bchydro.com](http://bchydro.com)

**Smart about power in all we do.**

---

**From:** Chambers, Paul (CA - British Columbia) [mailto:pachambers@deloitte.ca]  
**Sent:** 2017, September 19 11:16 AM  
**To:** McKenna, Joanne  
**Cc:** McKie, Melinda (CA - British Columbia); Hefflick, Ryan; Rempel, Vic; Magnus C. Verbrugge (mverbrugge@blg.com)  
**Subject:** RE: Wedgemount Power LP in Receivership

Hello Joanne,

Just following up on my email below.

Would it be help if we had a call? Given the timing, we would appreciate a response in the next couple of days if possible.

Many thanks,

**DELOITTE RESTRUCTURING INC.**  
 In its capacity as Court-appointed Receiver and Manager of Wedgemount Power Limited Partnership, Wedgemount Power (GP) Inc., and Wedgemount Power Inc., and not in its personal capacity

**Paul Chambers**  
 Vice President | Financial Advisory  
 Deloitte Restructuring Inc.  
 2800 - 1055 Dunsmuir Street, Vancouver, BC V7X 1P4  
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[pachambers@deloitte.ca](mailto:pachambers@deloitte.ca) | [deloitte.ca](http://deloitte.ca)

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**From:** Chambers, Paul (CA - British Columbia)  
**Sent:** Monday, September 11, 2017 11:13 AM  
**To:** McKenna, Joanne <[Joanne.McKenna@bchydro.com](mailto:Joanne.McKenna@bchydro.com)>  
**Cc:** McKie, Melinda (CA - British Columbia) <[mmckie@deloitte.ca](mailto:mmckie@deloitte.ca)>; Hefflick, Ryan <[Ryan.Hefflick@bchydro.com](mailto:Ryan.Hefflick@bchydro.com)>; Rempel, Vic <[Vic.Rempel@bchydro.com](mailto:Vic.Rempel@bchydro.com)>; Magnus C. Verbrugge ([mverbrugge@blg.com](mailto:mverbrugge@blg.com)) <[mverbrugge@blg.com](mailto:mverbrugge@blg.com)>  
**Subject:** RE: Wedgemount Power LP in Receivership

Good morning Joanne,

We are conscious that the second anniversary of the Target COD is approaching, as defined in the EPA (i.e. Sept 30, 2017).

Based on our discussions in May of this year, we understand that the 2 year termination provision set-out in paragraph 8.1(a) of the EPA is not applicable since the Interconnection Study Report remains in draft form and the Estimated Interconnection Facilities Completion Date remains subject to change pursuant to paragraph 3.9 of the EPA.

Please can you confirm this for us?

By way of update, the Receiver is continuing to advance planning and design for the interconnection, and we have had several meetings with Vic Rempel and Ryan Hefflick in this regard. The Receiver is also expecting to retain a contractor to finish the intake construction in the next couple of weeks.

Many thanks,

**DELOITTE RESTRUCTURING INC.**  
 In its capacity as Court-appointed Receiver and Manager of Wedgemount Power Limited Partnership, Wedgemount Power (GP) Inc., and Wedgemount Power Inc., and not in its personal capacity

**Paul Chambers**  
 Senior Manager | Financial Advisory  
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**From:** McKenna, Joanne [<mailto:Joanne.McKenna@bchydro.com>]  
**Sent:** Friday, May 19, 2017 9:18 AM  
**To:** Chambers, Paul (CA - British Columbia)  
**Subject:** RE: Correspondence

Hi Paul, my address is correct. Ryan Hefflick's email is [ryan.hefflick@bchydro.com](mailto:ryan.hefflick@bchydro.com). If you could copy him on any emails that would be great.

Thank-you, Joanne

---

**Joanne McKenna** | Sr. Manager, Distributed Generation, Business & Economic Development

**BC Hydro**  
 333 Dunsmuir St, 17th floor  
 Vancouver, BC V6B 5R3

P 604-623-4162  
M 604-505-7413  
E [Joanne.McKenna@bchydro.com](mailto:Joanne.McKenna@bchydro.com)

[bchydro.com](http://bchydro.com)

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**From:** Chambers, Paul (CA - British Columbia) [<mailto:pachambers@deloitte.ca>]  
**Sent:** 2017, May 18 4:44 PM  
**To:** McKenna, Joanne  
**Subject:** Correspondence

Hi Joanne,

Thank you for your participation in the call this afternoon.

Just checking I have the correct email address for you. Please also provide the email addresses of any other of your team members that you would like to be copied on correspondence moving forward.

We expect to send you the letter, as requested, first thing in the morning.

Kind regards,

**DELOITTE RESTRUCTURING INC.**

In its capacity as Court-appointed Receiver and Manager of Wedgemount Power Limited Partnership, Wedgemount Power (GP) Inc., and Wedgemount Power Inc., and not in its personal capacity

**Paul Chambers**

Vice President | Financial Advisory  
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The attached is Exhibit "C"  
referred to in the affidavit #1  
of Paul Chambers sworn before  
me at VANCOUVER, British Columbia.  
this 13<sup>th</sup> day of MARCH, 2018

  
A Commissioner for taking Affidavits in  
the Province of British Columbia

**From:** Rempel, Vic <Vic.Rempel@bchydro.com>  
**Sent:** October-13-17 3:29 PM  
**To:** Acharya, Om  
**Cc:** Chambers, Paul (CA - British Columbia); McKenna, Joanne; Chow, Bruce; McKie, Melinda (CA - British Columbia); Matt Obee (matthew.obee@cleanenergyconsulting.ca); Michael Potyok; Chow, Warren  
**Subject:** RE: WPLP Interconnection

Hi Om.

The 95% overhead line design dwgs for the FSR o/h alternative are accessible via the site link below.

Please review/comment/accept as appropriate. Regards

---

**Victor Rempel** | Manager, Distribution Generator Interconnections

BC Hydro

P 604 528 2623  
E [vic.rempel@bchydro.com](mailto:vic.rempel@bchydro.com)

---

**From:** Chambers, Paul (CA - British Columbia) [mailto:pachambers@deloitte.ca]  
**Sent:** 2017, October 13 2:36 PM  
**To:** Rempel, Vic  
**Cc:** McKenna, Joanne; Chow, Bruce; McKie, Melinda (CA - British Columbia); Matt Obee (matthew.obee@cleanenergyconsulting.ca); Michael Potyok  
**Subject:** WPLP Interconnection

Vic,  
As discussed at our meeting last week, I attach a link below to the updated (95%) overhead line design drawings for the FSR interconnection routing, as drafted by Clean Energy. If you have any difficulties downloading the drawings, please let me know.

<https://cleanenergy.eqnyte.com/fl/6UKSE0lzZG>

As regards the overhead line component, this drawings set is nearly finalized pending final acceptance from CN, MOTI, Transport Canada, and FLNRO.

Additionally, an assessment of foundation requirements for structures located adjacent to the highway near the bank of the Green River is pending with pole and anchor setting prescriptions for those specific structures to follow. All other works are to be undertaken in accordance with BC Hydro standards of practice. It is our understanding that environmental reviews are in place and that the project CEMP will cover these works.

Feel free to discuss with Matt Obee of Clean Energy on 604-301-3060 if you have any queries or comments.

Kind regards,

**DELOITTE RESTRUCTURING INC.**  
In its capacity as Court-appointed Receiver and Manager of Wedgemount Power Limited Partnership, Wedgemount Power (GP) Inc., and Wedgemount Power Inc., and not in its personal capacity

**Paul Chambers**  
Vice President | Financial Advisory

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The attached is Exhibit "D"  
referred to in the affidavit #1  
of Paul Chambers sworn before  
me at VANCOUVER, British Columbia.  
this 13<sup>th</sup> day of MARCH, 2018



\_\_\_\_\_  
A Commissioner for taking Affidavits in  
the Province of British Columbia

14

**From:** Matthew Obee <matthew.obee@cleanenergyconsulting.ca>  
**Sent:** October-27-17 4:40 PM  
**To:** Chambers, Paul (CA - British Columbia)  
**Cc:** Michael Potyok; Peter Helland; Matt Good  
**Subject:** FW: OE Design Review Comments - Section 2 (p48 to POI and Crossings) for Revised Design  
**Attachments:** RE: WPLP Interconnection; OE Design Review Comments - Section 2 (p48 to POI and Crossings) Revised Design.docx

Paul,

We received comments from BCH. Will review next week and call to discuss.

Matthew Obee, P.Eng.  
 C: 604.351.7691  
 P: 604.301.3060  
 F: 604.301.3061  
 450 – 1090 W. Georgia St  
 Vancouver, BC V6E 3V7  
[matthew.obee@cleanenergyconsulting.ca](mailto:matthew.obee@cleanenergyconsulting.ca)  
[www.cleanenergyconsulting.ca](http://www.cleanenergyconsulting.ca)

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---

**From:** Acharya, Om [mailto:Om.Acharya@bchydro.com]  
**Sent:** October 27, 2017 4:36 PM  
**To:** Nathan Jolly <nathan.jolly@cleanenergyconsulting.ca>; Matthew Obee <matthew.obee@cleanenergyconsulting.ca>  
**Cc:** Chhokar, Gurpreet <Gurpreet.Chhokar@bchydro.com>; Rempel, Vic <Vic.Rempel@bchydro.com>; Chow, Warren <Warren.Chow@bchydro.com>  
**Subject:** OE Design Review Comments - Section 2 (p48 to POI and Crossings) for Revised Design

Nathan,

We have reviewed the revised design you submitted for OE review. Attached are the OE Comments (including comments from our Quality Assurance Personnel) for you to address and notify us before the design is finalized for work order.

Let me know if any question.

THANKS

=====

**Om P Acharya, P.Eng.**  
 Regional Distribution Engineer, AIM & DE  
**BC Hydro**  
 6911 Southpoint Drive, Edmonds, Burnaby, BC V3N 4X8

Tel 604-528-3445  
 Cell 250-714-8222  
 Email [om.acharya@bchydro.com](mailto:om.acharya@bchydro.com)

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**Sent:** October-13-17 3:29 PM  
**To:** Acharya, Om  
**Cc:** Chambers, Paul (CA - British Columbia); McKenna, Joanne; Chow, Bruce; McKie, Melinda (CA - British Columbia); Matt Obee (matthew.obee@cleanenergyconsulting.ca); Michael Potyok; Chow, Warren  
**Subject:** RE: WPLP Interconnection

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**Flag Status:** Flagged

Hi Om.

The 95% overhead line design dwgs for the FSR o/h alternative are accessible via the site link below.

Please review/comment/accept as appropriate. Regards

---

**Victor Rempel** | Manager, Distribution Generator Interconnections

BC Hydro

P 604 528 2623  
E [vic.rempel@bchydro.com](mailto:vic.rempel@bchydro.com)

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**Sent:** 2017, October 13 2:36 PM  
**To:** Rempel, Vic  
**Cc:** McKenna, Joanne; Chow, Bruce; McKie, Melinda (CA - British Columbia); Matt Obee (matthew.obee@cleanenergyconsulting.ca); Michael Potyok  
**Subject:** WPLP Interconnection

Vic,

As discussed at our meeting last week, I attach a link below to the updated (95%) overhead line design drawings for the FSR interconnection routing, as drafted by Clean Energy. If you have any difficulties downloading the drawings, please let me know.

<https://cleanenergy.egnyte.com/fl/6UKSEOlzZG>

As regards the overhead line component, this drawings set is nearly finalized pending final acceptance from CN, MOTI, Transport Canada, and FLNRO.

Additionally, an assessment of foundation requirements for structures located adjacent to the highway near the bank of the Green River is pending with pole and anchor setting prescriptions for those specific structures to follow. All other works are to be undertaken in accordance with BC Hydro standards of practice. It is our understanding that environmental reviews are in place and that the project CEMP will cover these works.

Feel free to discuss with Matt Obee of Clean Energy on 604-301-3060 if you have any queries or comments.

Kind regards,

**DELOITTE RESTRUCTURING INC.**  
In its capacity as Court-appointed Receiver and Manager of Wedgemount Power Limited Partnership, Wedgemount Power (GP) Inc., and Wedgemount Power Inc.,

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and not in its personal capacity

**Paul Chambers**

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## BC Hydro Distribution: Design Review Comments

ESP: Clean Energy		Date: Oct 27, 2017	
Project Number/Title: Wedgemount IPP – Section 2 (P48 to POI+Crossings) 95% Review – Design Changed based on Sep 9, meeting with Nathan Jolly		Design Number: Section 2 (P48 to POI+Crossings)- 0004.114222	
Reviewer: Om Acharya (including QA, Gurpreet Chhokar)		Review Stage: 1	
#	Document Page #	BCH Comment	ESP Comments
1	General Comments	I am assuming approvals from various stakeholders outlined in 65% review have been obtained.	
2		Rail crossing: Contact from Rail company needs to be added on construction plot/notes for crews to coordinate work with, as rail flaggers will be required.	
3	Structure Data Sheet 1383.2-T-9005	On Structure Data Sheet 1383.2-T-9005 some of the u/b poles are referencing standards with one circuit STR 50 & 51. ES43 Section H U/B standards should be referenced. Otherwise detail drawing will need to be created for structure and accepted by BCH O.E.	
4	Structure Data Sheet 1383.2-T-9005	Lead lengths for anchors have not been specified I.E. Anchor to be installed 5.0m south of pole.	
5		Stub poles need to be digitized on Construction drawings. Also staking coordinates for stub poles need to be provided.	
6		Separate anchors have to be installed for Telus. Telus is responsible for Down Guy installation to their anchors.	

7		For removal poles with Telus should indicate "Cut pole to Tel" not "To be removed". Poles that are hydro only should be indicated as "to be removed".	
8	Structure 54 -- 1382.2-T-2005	Drawing for modified structure needs to be stamped and sealed.	
9	DAD/PA#	N/A	
10	Drawing		
11			
12	Pole Permit	N/A	
13	Passport Estimate	N/A	
14	JPF	JPF not included and there for not reviewed. Please include JPF with WO construction package.	
15	Pole 48 -- AMEC and Clean Energy	Common Pole - Need to have a discussion/meeting with AMEC in order to finalize the design (both parties acceptance required) as discussed before.	
16	Railway Crossing	Approval from CN is required	
17	Hwy 99 Crossing	MOTI approval required	
18	Transmission Line Crossings	BCH Transmission Approval required. However, I don't see any issue.	
19	Green River Crossing	NAV Canada approval required.	
20	SbD Spreadsheet	Needed to be prepared?	

**Hydro**

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Notes:



No. S-174308  
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

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**AFFIDAVIT**

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Barristers & Solicitors  
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File No. L67090009

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