

Aboriginal Training and Inclusion Plan

Site C Clean Energy Project Revision 1: June 5, 2015



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Revision History

Version	Date	Comments
Draft	10-17-2014	Draft
Rev 0	05-19-2015	Final Plan
Rev 1	06-05-2015	Final Plan, Revision 1

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1.0 Background

1.1 The Site C Clean Energy Project

The Site C Clean Energy Project (the Project) will be the third dam and generating station on the Peace River in northeast B.C. The Project will provide 1,100 megawatts of capacity and about 5,100 gigawatt hours of energy each year to the province's integrated electricity system. The Project will be a source of clean, reliable and cost-effective electricity for BC Hydro's customers for more than 100 years.

The key components of the Project are:

- an earthfill dam, approximately 1,050 metres long and 60 metres high above the riverbed;
- an 83 kilometre long reservoir that will be, on average, two to three times the width of the current river;
- a generating station with six 183 MW generating units;
- two new 500 kilovolt AC transmission lines that will connect the Project facilities to the Peace Canyon Substation, along an existing right-of-way;
- realignment of six segments of Highway 29 over a total distance of approximately 30 kilometers; and
- construction of a berm at Hudson's Hope.

The Project will also include the construction of temporary access roads, a temporary bridge across the Peace River, and worker accommodation at the dam site.

1.2 Project Benefits

The Project will provide important benefits to British Columbia and Canada. It will serve the public interest by delivering long term, reliable electricity to meet growing demand; contribute to employment, economic development, ratepayer, taxpayer and community benefits; meet the need for electricity with lower GHG impact than other resource options; contribute to sustainability by optimizing the use of existing hydroelectric facilities, delivering approximately 35 per cent of the energy produced at the W.A.C. Bennett Dam, with only five per cent of the reservoir area; and include an honourable process of engagement with First Nations and the potential for accommodation of their interests.

1.3 Environmental Assessment Process

The environmental assessment of the Project has been carried out in accordance with the Canadian Environmental Assessment Act, 2012 (CEAA 2012), the BC Environmental Assessment Act (BCEAA), and the Federal-Provincial Agreement to Conduct a Cooperative Environmental Assessment, Including the Establishment of a Joint Review Panel of the Site C Clean Energy Project. The assessment considered the environmental, economic, social, heritage and health effects and benefits of the Project, and included the engagement of Aboriginal groups, the public, all levels of government, and other stakeholders in the assessment process.

Detailed findings of the environmental assessment are documented in the Site C Clean Energy Project Environmental Impact Statement (EIS), which was completed in accordance with the Environmental Impact Statement Guidelines (EIS Guidelines) issued by the Minister of Environment of Canada and the Executive Director of the Environmental Assessment Office of British Columbia. The EIS was submitted to regulatory agencies in January 2013, and amended

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in August 2013 following a 60 day public comment period on the assessment, including open house sessions in Fort St. John, Hudson's Hope, Dawson Creek, Chetwynd, town of Peace River (Alberta) and Prince George.

In August 2013, an independent Joint Review Panel (JRP) commenced its evaluation of the EIS, and in December 2013 and January 2014 undertook five weeks of public hearings on the Project in 11 communities in the Peace region, including six Aboriginal communities. In May 2014, the JRP provided the provincial and federal governments with a report summarizing the Panel's rationale, conclusions and recommendations relating to the environmental assessment of the Project. On completion of the JRP stage of the environmental assessment, the CEA Agency and BCEAO consulted with Aboriginal groups on the JRP report, and finalized key documents of the environmental assessment for inclusion in a Referral Package for the Provincial Ministers of Environment and Forests, Lands and Natural Resource Operations.

Construction of the Project is also subject to regulatory permits and authorizations, and other approvals. In addition, the Crown has a duty to consult and, where appropriate, accommodate Aboriginal groups.

1.4 Environmental Assessment Findings

The environmental assessment of the Project focused on 22 valued components (VCs), or aspects of the biophysical and human setting that are considered important by Aboriginal groups, the public, the scientific community, and government agencies. In the EIS, valued components were categorized under five pillars: environmental, economic, social, heritage and health. For each VC, the assessment of the potential effects of the Project components and activities during construction and operations was based on a comparison of the biophysical and human environments between the predicted future conditions with the Project, and the predicted future conditions without the Project.

Potential adverse effects on each VC are described in the EIS along with technically and economically feasible mitigation measures, their potential effectiveness, as well as specific follow-up and related commitments for implementation. If a residual effect was found on a VC, the effect was evaluated for significance. Residual effects were categorized using criteria related to direction, magnitude, geographic extent, context, level of confidence and probability, in accordance with the EIS Guidelines.

The assessment found that the effects of the Project will largely be mitigated through careful, comprehensive mitigation programs and ongoing monitoring during construction and operations. The EIS indicates that the Project is unlikely to result in a significant adverse effect for most of the valued components. However, a determination of a significant effect of the Project was found on four VCs: Fish and Fish Habitat, Wildlife Resources, Vegetation and Ecological Communities, and Current Use of Lands and Resources for Traditional Purposes.

1.5 Environmental Assessment Conclusion

On October 14, 2014, the Provincial Ministers of Environment and of Forests, Lands and Natural Resource Operation decided that the Project is in the public interest and that the benefits provided by the Project outweigh the risks of significant adverse environmental, social and heritage effects (http://www.newsroom.gov.bc.ca/2014/10/site-c-project-granted-environmental-assessment-approval.html). The Ministers have issued an Environmental Assessment Certificate setting conditions under which the Project can proceed.

Further, on November 25, 2014, the Minister of Environment of Canada issued a Decision Statement confirming that, while the Project has the potential to result in some significant adverse effects, the Federal Cabinet has concluded that those effects are justified in the

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circumstances. The Decision Statement sets out the conditions under which the Project can proceed.

1.6 Development of Mitigation, Management and Monitoring Plans

Mitigation, management and monitoring plans for the Project have been developed taking into account the measures proposed in the EIS, information received during the Joint Review Panel hearing process, and the Report of the Joint Review Panel on the Project. Those plans are consistent with, and meet requirements set out in, the conditions of the Environmental Assessment Certificate and of the Decision Statement issued on October 14, 2014 and November 25, 2014 respectively.

In addition, in accordance with environmental best practices (Condition 3.1), these plans were informed by the best available information and knowledge, based on validated methods and models, undertaken by qualified individuals and apply the best available economically and technologically feasible mitigation strategies. These plans contain provisions for review and update as new information on the effects of the Project and on the efficacy of the mitigation measures become available.

2.0 Aboriginal Training and Inclusion Plan

2.1 Plan Objectives and Scope

This Aboriginal Training and Inclusion Plan (Plan) describes how BC Hydro will implement the mitigation measures directed toward Aboriginal groups pursuant to sections 17 (Labour Market), 18 (Regional Economic Development), and 28 (Population and Demographics) of the EIS. As monitoring is not a component of these mitigations, no monitoring is included in this Plan. This Plan is aligned with the Labour and Training Plan, and the Business Participation Plan.

The Plan has been developed in accordance with Condition 54 of the Environmental Assessment Certificate (EAC), as indicated in the table below.

EAC Condition 54	Plan Reference
The EAC Holder must develop an Aboriginal Training and Inclusion Plan.	
The Aboriginal Training and Inclusion Plan must include at least the following:	
Description of a protocol and plan for the communication of employment opportunities to Aboriginal groups.	Section 5.1 Communication of Potential Employment Opportunities
Inclusion of evaluation criteria for hiring and training Aboriginal persons in contractor procurement packages.	Section 5.2 Inclusion of Evaluation Criteria for Hiring and Training Aboriginal People
Strategies for capacity building, education, and training associated with Aboriginal participation in the labour market, including construction, trades, and other indirect and induced sectors for Aboriginal workers, as these jobs	Section 5.2.1 Strategies for Capacity Building, Education, and Training Associated with Aboriginal

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are lik constru	ely to be longer lived than those related strictly to uction.	Participation in the Labour Market
Resources and funding arrangements to support training, industry, and Aboriginal partnership opportunities in the region. Provide \$30,000 to the to the Minerva Foundation for three years to support Treaty 8 First Nation women in northeast BC wishing to participate in the Minerva Foundation's Combining Our Strength Initiative (\$10,000 provided to date.). This is in addition to funding provided to date to Northern Lights College Foundation (\$1 million over five years), Northern Development Opportunities Program (\$175,000), Northern Opportunities School District Counsellor (\$184,000), NENAS NEATT Program (\$100,000) and Oho Education (\$16,600).		Section 5.2.2 Resources and funding arrangements to support training, industry and Aboriginal partnership opportunities in the region
opport	inal Business Participation Strategy to maximize unities for Aboriginal businesses, incorporating at ne following:	Section 5.2.3 Aboriginal Business Participation Strategy
0	Obtaining information from Aboriginal suppliers in the LAA, and from other Aboriginal groups with whom BC Hydro is engaged about the Project, about their business capacity and capabilities to provide goods and services for the Project	Section 5.2.3.3 Information gathering
0	Direct engagement with the local Aboriginal business community, including sponsoring and participating in Aboriginal business events and conferences.	Section 5.2.3.2 Direct engagement with the local Aboriginal business community
0	Implementation of BC Hydro's Aboriginal Contract and Procurement Policy.	Section 5.2.3.1 BC Hydro's Aboriginal Contract and Procurement Policy

2.2 Consultation

Many of the conditions require BC Hydro to consult or collaborate with certain government agencies and Aboriginal groups in respect of measures and plans required by the conditions.

BC Hydro began consultation on the Project in late 2007, before any decision to advance the Project to an environmental assessment. BC Hydro's consultation with the public, stakeholders, regional and local governments, regulatory agencies, and Aboriginal groups is described in EIS Section 9, Information Distribution and Consultation.

Additional information on the consultation process and a summary of issues and concerns raised during consultation are provided in:

 Volume 1 Appendix G, Public Information Distribution and Consulting Supporting Documentation

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- Volume 1 Appendix H, Aboriginal Information Distribution and Consultation Supporting Documentation
- Volume 1 Appendix I, Government Agency Information Distribution and Consultation Supporting Documentation
- Volume 5, Appendix A01 to A29, Parts 2 and 2A, Aboriginal Consultation Summaries
- Technical Memo: Aboriginal Consultation

Draft versions of a number of the mitigation, management and monitoring plans required by the conditions were submitted to applicable government agencies and Aboriginal groups for comment on October 17, 2014.

Comments on these draft plans were received from various government agencies and Aboriginal groups during November and December 2014, and were considered in the revisions to these plans. BC Hydro's consideration of these comments is provided in the consideration tracking tables that accompany each plan.

On December 15, 2014, Treaty 8 Tribal Association (T8TA), on behalf of West Moberly, Saulteau and Prophet River First Nations, submitted to BC Hydro a letter in response to BC Hydro's request for comment on the Plans sent on October 17, 2014. The letter included several appendices, including the Joint Review Panel (JRP) Report and transcripts from the JRP hearings in December 2013 and January 2014. BC Hydro responded to the three First Nations on January 21, 2015 noting that the October 17 2014 request for comments on the plans was to provide an opportunity to the First Nations to submit to BC Hydro any information they wanted to provide in relation to the Plans. BC Hydro advised that it was aware of the information referred to in T8TA's letter when the plans were prepared, and advised that it was preparing a table setting out where any mitigation measures identified by representatives of the three First Nations during the hearings are considered in the draft plans and would provide that to the First Nations once complete. Accordingly BC Hydro's responses to those mitigation measures identified by the representatives of the three First Nations during the JRP hearings were provided to the EAO in a separate table by letter dated May 19, 2015. Aside from the December 15, 2014 letter, BC Hydro has not received further comments from these First Nations. A letter of understanding dated April 30, 2015 respecting provision of capacity funding to support review of the plans was entered into by BC Hydro and Saulteau First Nations (on behalf of Saulteau, West Moberly and Prophet River First Nations).

New draft plans (i.e., Housing Plan and Housing Monitoring and Follow-Up Program, and the quarry/pit development plans) were provided to the entities identified in the EAC conditions on April 7, 2015. The Vegetation and Wildlife Mitigation and Monitoring Plan was revised based on comments received on the October 17, 2014 version and based on discussions with Environment Canada and the BC Ministry of Environment, and was re-submitted to applicable entities on April 7, 2015.

Comments on the revised plans were requested by May 11, 2015 to allow for review, consideration of comments and finalization of the plans 30 days prior to the commencement of construction.

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Comments were received by this requested date from:

- Fort Nelson First Nation
- Ministry of Forests, Lands and Natural Resource Operations (FLNRO), and
- Métis Nation British Columbia.

The Peace River Regional District submitted their comments on the plan on May 14, 2015. FLNRO submitted additional comments on May 15, 2015, including comments from the BC Ministry of Environment.

BC Hydro considered the comments provided and prepared final plans. On May 19, 2015, BC Hydro submitted the following mitigation, management and monitoring plans to the BC Environmental Assessment Office (BC EAO) for review:

- Construction Environmental Management Plan
- Construction Safety Management Plan
- Fisheries and Aquatic Habitat Management Plan
- Vegetation and Wildlife Mitigation and Monitoring Plan
- Vegetation Clearing and Debris Management Plan
- Aboriginal Plant Use Mitigation Plan
- Aboriginal Training and Inclusion Plan
- Business Participation Plan
- Emergency Services Plan
- Healthcare Services Plan
- Labour and Training Plan
- Cultural Resources Mitigation Plan
- Heritage Resources Management Plan
- Housing Plan and Housing Monitoring and Follow-Up Program
- Wuthrich Quarry Development Plan
- West Pine Quarry Development Plan; and
- Del Rio Pit Development Plan.

The CEA Agency and Environment Canada submitted comments on the revised plan on May 22, 2015. These comments were considered and the final plans were revised accordingly and submitted on June 5, 2015 to the entities identified in the EAC conditions.

3.0 Baseline Conditions

Baseline conditions relevant to this plan are found in sections 17 (Labour Market), 18 (Regional Economic Development) and 28 (Population and Demographics) of the EIS and are included in this Plan as Appendix A.

4.0 Potential Project Effects

The table below summarizes the potential Project effects as described in the EIS sections 17, 18 and 28:

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EIS Section	Potential Project Effect	
17 Labour Market	 Change in demand for direct and indirect construction phase labour A comparison of the Project labour requirements against the baseline and forecast local labour supply and demand by skill category, where the data are available 	
18 – Regional Economic Development	 Change in business opportunities Change in LAA business and contracting profile, capabilities, and capacity 	
28 – Population and Demographics	 Changes to PRRD population, with specific reference to City of Fort St. John Changes to Aboriginal community populations 	

With respect to these potential Project effects, BC Hydro's list of mitigation measures is included in Appendix B.

5.0 EAC Condition 54: Mitigation Measures

5.1 Communication of potential employment opportunities to Aboriginal groups

Contracts awarded by BC Hydro will contain an Aboriginal Inclusion and Reporting Requirements Schedule, which includes a requirement for contractors to make reasonable commercial efforts to provide employment opportunities for Aboriginal persons. An aspect of the role of the Aboriginal Opportunities Coordinator described in the Schedule is to coordinate, on behalf of the contractor, opportunities for Aboriginal businesses and Aboriginal persons in the performance of the work under that specific contract. A sample of the Aboriginal Inclusion and Reporting Requirements Schedule used in the Early Work Clearing (RFP 1875), posted in June 2014, is included in Appendix C.

Contracts will also include language requiring contractors to post jobs on BC Hydro's website or other location, and to make reasonable efforts to participate in Peace Region job fairs on an annual basis. Major contractors will also be required to advertise jobs for Project-related work in publications and with employment agencies identified by BC Hydro in Northern BC.

5.2 Inclusion of Evaluation Criteria for Hiring and Training Aboriginal People

Evaluation criteria considering the Aboriginal Content of bid proposals will be included in all procurement processes. These criteria require proponents to describe how their business practices support or benefit Aboriginal peoples, such as training and/or mentoring programs for Aboriginal employees and/or subcontractors that may be involved in performing the work. The proposal must also include a draft Aboriginal Inclusion Plan. A sample of the Aboriginal Content evaluation criteria used in the Early Works Clearing (RFP 1875) is included in Appendix D.

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5.2.1 Strategies for Capacity Building, Education, and Training Associated with Aboriginal Participation in the Labour Market

BC Hydro is implementing capacity-building initiatives, which provide funding or resources in order to provide training, improve skills or increase business capacity in Aboriginal businesses. Initiatives completed to date and those which are ongoing are described below.

In addition, BC Hydro will consider proposals from Aboriginal groups and training organizations for potential capacity building, education, and training opportunities associated with participation in the labour market.

5.2.2 Resources and Funding Arrangements to Support Training, Industry, and Aboriginal Partnership Opportunities in the Region

BC Hydro recognised the importance of supporting training opportunities for skills development, training and job readiness both before and during the early phases of construction, and therefore initiated its training support mitigation measures during the pre-construction phase. Specific initiatives are described below.

5.2.2.1 BC Hydro Trades and Skilled Training Bursary at Northern Lights College

BC Hydro has made a contribution \$1 million in funding to support trades and skills training bursaries at Northern Lights College. Announced in September 2012 by the Honourable Rich Coleman, Minister of Energy, Mines and Natural Gas, the funding will be disbursed over a five-year period to support the development of skilled workers in the north, targeting those students who may not otherwise have access to post-secondary education. Fifty per cent of the funding for bursaries is dedicated to Aboriginal students and applications. The first BC Hydro Trades and Skilled Training bursaries were awarded for the fall 2013 school year. The bursaries are available to students pursuing an identified list of programs and are offered at Northern Lights College's campuses in Northeast BC. While the list of may be revised from time to time, and the current list of programs supported by the Bursary includes the following:

- Aircraft Maintenance Engineering
- Automotive Service Technician Foundation and Apprenticeship
- o Carpentry Foundation (Residential Construction) and Apprenticeship
- Commercial Transport Technician Apprenticeship
- Cook Training
- Early Childhood Education and Care Diploma
- Electrician Foundation and Apprenticeship
- Heavy Duty Equipment Technician Apprenticeship
- Heavy Duty/Commercial Transport Technician Foundation
- Industrial Instrumentation Mechanic Foundation and Apprenticeship
- Millwright Foundation and Apprenticeship
- Plumber Foundation and Apprenticeship
- Practical Nursing Diploma
- Social Services Worker Diploma
- o Welding 1 Level C, B, A and Apprenticeship

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As of April 29, 2015, 44 Aboriginal students had benefitted from the bursary. The program provides up to \$5,000 to assist qualifying individuals for payment of tuition and other expenses in respect of the identified programs. This award focuses on increasing participation in trades training and supporting the development of skilled workers in Northeast British Columbia. Additional funding to cover the costs associated with living expenses (defined broadly and including childcare, transportation, etc.) may also be available based on financial need and personal circumstances of the applicant.

For more information about the bursary, please contact Northern Lights College:

http://www.nlc.bc.ca/AboutNLC/NLCFoundation/StudentAwardsGrants.aspx?udt_1736_param_detail=615

5.2.2.2 Northern Opportunities Partnership

In July 2011, BC Hydro entered into a three-year funding agreement with Northern Opportunities, a partnership of the school districts of Fort Nelson (SD #81), Peace River North (SD #60), and Peace River South (SD #59), Northern Lights College, local First Nations, industry and local communities with an objective to provide young people with a seamless learning pathway from secondary school to post-secondary training, leading to career success. A dual-credit program offered in the Peace Region combines high school, college studies and work-based training, enabling students to earn both a high school diploma and advanced credit in post-secondary and/or industry certification at the same time. The program covers academic, trades and apprenticeship and vocational programs, and is open to both Aboriginal and non-Aboriginal students. The program has had good success and strong graduation rates for both Aboriginal and non-Aboriginal students.

As a Northern Opportunities Partner, BC Hydro sits as a member of the Northern Opportunities' Community Learning Council. BC Hydro has extended its funding for an additional two years, covering 2014-2015.

In 2013, BC Hydro provided \$184,000 in funding to Northern Opportunities for the creation of a school district career counsellor position to encourage students to stay in school and facilitate a transition into trades and career training. This position will service the four school districts that partner with Northern Opportunities, specifically School Districts 60, 59, 81 and the Chalo School. This counsellor role has been identified as key to supporting and encouraging high school students to remain in school and to transition into trades and career training.

More information about the Northern Opportunities partnership can be found here: http://northernopportunities.bc.ca/

5.2.2.3 Partnership with the North East Native Advancing Society (NENAS)

Working in partnership with the NENAS, BC Hydro assisted in developing a proposal to secure funding from the Industry Training Authority (ITA) to support essential skills and pre-trades training program, North East Aboriginal Trades Training (NEATT). NENAS was successful in securing funding from the ITA for a two-year program, which began its first intake in the spring of 2012. NEATT offers two key streams: an 8-week Essential Skills for Apprenticeship program that is tailored to an individual learner's needs, and an 8-week Pre-Apprenticeship Exploration program that prepares individuals to enter into formal trades training.

In late 2012, BC Hydro provided \$100,000 over two years to NENAS in support of advancing NEATT participants into trades training not currently offered by Northern Lights College for those trades that are of interest to BC Hydro for the Site C Project, such as heavy duty equipment operators. The funding was used to defray tuition and related costs for those students pursuing trades training.

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While the NEATT program is now complete, BC Hydro remains interested in engaging with NENAS on projects that seek to meet the objectives of this Plan.

More information about NENAS can be found here: http://www.nenas.org/

5.2.2.4 College of New Caledonia's Heavy Equipment Operator Training

BC Hydro is in discussions with the College of New Caledonia (CNC) with respect to providing support to students interested in its Heavy Equipment Operator training in Mackenzie, B.C. The 12-week program offers intensive, hands-on experience in equipment operation, routine maintenance, and practical field operations. The objective is to have students learn through real-time, project-based learning on real equipment. First Nations that have expressed an interest to date in participating in the program include McLeod Lake and Kwadacha.

More information about CNC's Heavy Equipment Operator training can be found here: http://www.cnc.bc.ca/programs-courses/Mackenzie/Heavy_Equipment_Operator.htm

5.2.2.5 Minerva Foundation Combining Our Strength Initiative

On July 3, 2014, BC Hydro signed an agreement with the Minerva Foundation to provide funding to support Treaty 8 First Nation women of northeast BC participate in the Combining Our Strength Initiative. BC Hydro will provide Minerva with a total of \$30,000, to be paid in three separate installments of \$10,000 per year, for the fiscal years 2014-15, 2015-16, and 2016-17.

More information on the Minerva Foundation Combining Our Strength Initiative can be found here: https://theminervafoundation.com/lead/combining-our-strength/

5.2.2.6 OHO Education

On September 12, 2013, BC Hydro C provided Oho Education funding in the amount of \$4833 for a two-day training program for Treaty 8 Aboriginal Education Coordinators and Leaders located in northeast BC. Oho Education is an Aboriginal business with the goal of making custom designed education systems and accessory materials available to Aboriginal communities across Canada.

Due to the success of this initial program, BC Hydro agreed to fund continued work with BC Treaty 8 Aboriginal Education Coordinators in 2014. A total of \$25,765.25 was provided to Oho Education by three corporate groups within BC Hydro.

More information on OHO Education can be found here: http://ohoeducation.com/

5.2.3 Aboriginal Business Participation Strategy

BC Hydro's Aboriginal Business Participation Strategy is aligned with the broader Business Participation Plan. Described below are initiatives particular to BC Hydro's efforts to engage Aboriginal businesses in the Project.

5.2.3.1 BC Hydro's Aboriginal Contract and Procurement Policy

BC Hydro is committed to the advancement of economic opportunities for Aboriginal groups, both to build their capacity and to develop more sustainable long-term relationships. BC Hydro's Aboriginal Contract and Procurement Policy¹ is intended to increase the involvement of Aboriginal groups in economic opportunities associated with BC Hydro's business activities by allowing certain procurement practices, including:

https://www.bchydro.com/content/dam/hydro/medialib/internet/documents/about/company_information/partners_vendors/PV_aboriginal_contract_policy.pdf

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¹ Available at:

- Capacity-building initiatives, where BC Hydro provides funding or resources in order to provide training, improve skills, or increase business capacity in Aboriginal businesses
- Directed Aboriginal procurement, such as set-asides, restricted tendering, and single source negotiations
- The use of Aboriginal evaluation criteria in procurement packages. This provides an
 incentive for primary contractors to establish working relationships with First Nations
 groups, and increases the likelihood of Aboriginal participation in the construction
 contracts while maintaining a competitive environment that provides maximum benefits
 to ratepayers.
- The use of an Aboriginal business directory. BC Hydro's Aboriginal Business Directory is accessible by BC Hydro to suppliers and contractors, and enables BC Hydro to promote partnerships between non-Aboriginal, First Nations, and Aboriginal businesses in contract work for BC Hydro.

To date, BC Hydro has sought to provide economic benefits and to support capacity-building opportunities for Aboriginal people prior to and during the construction phase of the Project. BC Hydro has been building Aboriginal business capacity through the use of directed procurement activities, both prior to and during the Environmental Assessment process on the Project.

The following criteria are used by BC Hydro to determine whether a business can qualify as an Aboriginal Business:

- a. If the business is a sole proprietorship, it must be wholly owned by an Aboriginal person
- b. If the business is a corporation, it must have at least 51 per cent of the equity (including any common or voting shares) owned by one or more Aboriginal Businesses or Aboriginal People;
- c. If the business is a partnership or joint venture, it must have at least 51 per cent of the ownership rights (including any voting rights) directly held by one or more Aboriginal Businesses or Aboriginal People or,
- d. As determined by BC Hydro in its sole discretion from time to time, any other business with a substantial amount of ownership rights held by one or more Aboriginal Businesses or Aboriginal Peoples.

When an Aboriginal Business has six or more full-time employees at the date of submitting the bid, at least a third of the employees are Aboriginal Peoples, and this ratio must be maintained throughout the duration of the contract. "Aboriginal" is defined as First Nations, Métis, and Inuit.

5.2.3.2 Direct Engagement with the Local Aboriginal Business Community

BC Hydro has engaged the local Aboriginal Business community through the initiatives outlined below. Where appropriate, BC Hydro will continue to employ these and other mechanisms to engage the local business community in opportunities that arise as a result of the Project:

- **Site C Business Directory**: businesses can register themselves on this Directory, and self-identify as Aboriginal businesses. The Directory is used to distribute information about upcoming events and procurements, including those procurements posted to BC Bid. More information on the Site C Business Directory can be found here: https://www.sitecproject.com/business-and-job-opportunities/site-c-business-directory
- Business information sessions were held in the communities of Chetwynd, Dawson Creek, Fort St. John, Prince George, and Vancouver in fall 2011 and fall 2012. An

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additional session in the District of Hudson's Hope was added in fall 2012. BC Hydro partnered with business organizations and the District of Hudson's Hope to host and promote the business information sessions. Aboriginal businesses were provided notification of the sessions. The sessions provided an early opportunity for businesses to hear directly from members of the Project team about Project design, as well as about potential future business opportunities. Attendees were asked to provide feedback on how they would like to be engaged about potential business opportunities in the future.

- Business-to-Business sessions with proponents for large contracts associated with the Project. For the Worker Accommodation contract, a session for the general business community was held July 29, 2014, and one specifically for Aboriginal businesses was held July 30, 2014. Similar sessions were held for the Main Civil Works contract proponents in September 2014, and may be held again in the future as the Project proceeds through the construction phase.
- In February 2012, BC Hydro sponsored and participated in the inaugural **Aboriginal Business Match** (ABM) Conference in Prince George. Now an annual event, the conference brings together top business and economic development decision-makers from more than 150 First Nations and Tribal Councils with businesses, investors, customers, and suppliers looking to do business in First Nation communities. With the unique conference format, representatives from the Site C team have been able to have one-on-one meetings with Aboriginal businesses and to build an awareness of regional First Nation suppliers and promote potential upcoming opportunities arising from the Site C project. BC Hydro and the Site C team sponsored and attended the event in 2013 and 2014. For 2015, the ABM BC conference will be expanded into ABM West and will include community decision makers from BC and Alberta.
- On request from Aboriginal groups, BC Hydro's procurement and Aboriginal Business staff have attended consultation and community meetings to review BC Hydro's Aboriginal Contact and Procurement Policy, and assist Aboriginal businesses with registration with the BC Hydro/Site C Aboriginal Business Directory. Additionally, regular check-in meetings were held with Aboriginal businesses doing work on the project to understand their capacity and interests with respect to ongoing work for the Project, should it proceed to construction.

5.2.3.3 Information Gathering

In addition to the methods outlined above, BC Hydro has done market sounding outreach with local Aboriginal businesses in order to understand their capacity and interest in participating in work with the Site C Project.

The socio-economic effects assessment included in the EIS did consider, where made available to BC Hydro, information about the business capacity of the Aboriginal communities in the region. Much of the information considered in that assessment was provided by the communities themselves in community baseline profiles that were prepared for consideration of BC Hydro.

Since the completion of the EIS, BC Hydro has continued to gather information about the specific business interests and capabilities for Aboriginal communities in the region. This work will be ongoing through the construction phase of the Project.

5.3 Schedule

BC Hydro proposes to carry out the activities described in this Plan on an ongoing basis, through the construction phase of the Project.

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5.4 Spatial Description of Plan Area

BC Hydro proposes that this plan cover the geographic area described as the Local Assessment Area in the EIS. The area is defined as the Peace River Regional District and the Northern Rockies Regional Municipality, which, together, are known as the Northeast Development Region.

6.0 Reporting

BC Hydro will prepare and submit an annual summary of activities carried out under this plan to the EAO, CEA Agency and Aboriginal Groups. For the purposes of this plan, Aboriginal Groups include:

- Blueberry River First Nations
- Dene Tha' First Nation
- Doig River First Nation
- Duncan's First Nation
- Fort Nelson First Nation
- Halfway River First Nation
- Horse Lake First Nation
- Kelly Lake Métis Settlement Society
- McLeod Lake Indian Band
- Métis Nation BC
- Prophet River First Nation
- Saulteau First Nations
- West Moberly First Nations

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Appendix A: Baseline Conditions

Baseline Conditions are described in Sections 17, 18, and 28 of the EIS.

Section 17 (Labour Market):

Aboriginal Peoples

The labour market baseline for Aboriginal peoples in the LAA focused on its labour supply features, using the following key indicators (where data are publicly available):

- Labour force size, participation rate, unemployed numbers, and unemployment rate of the Aboriginal population and First Nations communities in the LAA
- Occupation and industry affiliation of the labour force of the Aboriginal population and First Nations communities in the LAA

Comparison between the Aboriginal and non-Aboriginal labour forces in the LAA is presented to determine similarities and differences in relation to these labour force characteristics.

Aboriginal Labour Force Indicators

The Aboriginal population accounted for 10.4% of the labour force in the LAA in 2006, with an unemployment rate of the Aboriginal labour force (14.6%) over three times more than the rate for the non-Aboriginal labour force in the LAA.

The monthly Labour Force Survey includes a question to determine if a respondent identifies as an Aboriginal person. The unemployment rate for Aboriginal persons living off-reserve in the LAA in 2011 was 8.8%, compared to 4.4% for non-Aboriginal persons. This survey does not include respondents living in First Nations communities.

Labour force indicators for the Aboriginal population and First Nations communities in the LAA are presented in Table 1.

Table 1. Labour Market Statistics for the Aboriginal Population in the LAA

Population and First Nations Communities	Labour Force (persons)	Employed (persons)	Participation Rate (%)	Unemployed (persons)	Unemployment Rate (%)	
Labour Force Survey data	(2011) ^a					
Non-Aboriginal Population ('000)	35.7	34.1	76.8	1.6	4.4	
Aboriginal Population (off-reserve only) ('000)	3.4	3.1	69.5	0.3	8.8	
Census of Population data (2006)						
Non-Aboriginal Population	34,350	32,775	76.9	1,580	4.6	
Aboriginal Population (on-reserve & off-reserve)	3,970	3,390	70.5	580	14.6	

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Doig River First Nations	35	30	53.3	10	30
Halfway River First Nation	NA	NA	50.0	NA	50
Prophet River First Nation	NA	NA	64.3	NA	33
West Moberly First Nations	NA	NA	50.0	NA	NA

NOTE:

The Labour Force Survey data reported in this table are an annual average, whereas the census data are for the week prior to Census Day (May 16, 2006). The Labour Force Survey provides the most up-to-date data on labour force characteristics, but the Census of Population provides a more accurate point-in-time estimate. The Labour Force Survey is conducted on a large sample of the Canadian population, approximately 100,000 persons and 54,000 households on a monthly basis. Responding to this survey is mandatory. The 2006 Census of Population also used a sampling procedure, but had a larger sample: one in five Canadian households. The larger sample of the Census of Population provides for a more accurate estimate of labour force characteristics.

NA - data not available

Sources: First Nations Community Baseline Reports (see Volume 3 Appendix B First Nations Community Baseline Reports, Part 7 Community Baseline Report and EIS Integration Summary Table for Doig River First Nation, Halfway River First Nation, Prophet River First Nation, and West Moberly First Nations); Statistics Canada (2007, 2009); BC Stats (2012a)

Most First Nations communities in the LAA experience higher unemployment rates and lower participation rates than the Aboriginal population living off-reserve in the LAA. The higher unemployment rates in most First Nations communities in the LAA compared to the Aboriginal population residing in non-Aboriginal communities are likely due to the limited wage-based economic activity in the First Nations communities and the longer commuting distances to the centres with job opportunities. This differential between Aboriginal people living on Indian Reserves and Aboriginal people living off Indian Reserves is typical across the province; the unemployment rate for Aboriginal people living on-reserve in 2006 was 25.0%, twice as much for Aboriginal people living off-reserve, 11.9% (BC Stats 2012b).

The First Nations communities that are close to the main centres of economic activity in the LAA have lower levels of unemployment compared to those living further away. For example, the First Nations communities of the West Moberly First Nations are currently experiencing strong employment. The community is about 30 km from Chetwynd, 30 km from Hudson's Hope and 90 km from Fort St. John, all of which are strong economic centres. There is an anecdotal reference in the Baseline Community Profile of Doig River First Nations, Halfway River First Nation, Prophet River First Nation and West Moberly First Nations that the current unemployment rate in the West Moberly First Nations community is low, "...everybody that wants to work is working and almost all of them have good jobs" (T8FNs Community Assessment Team and The Firelight Group Research Cooperative 2012a:124) and in Volume 3 Appendix B First Nations Community Baseline Reports, Part 7 Community Baseline Report and EIS Integration Summary Table for Doig River First Nation, Halfway River First Nation, Prophet River First Nation, and West Moberly First Nations).

The situation of high unemployment and low participation rates is more acute in First Nations communities that are more remote from the main nodes of economic activity, including Doig River First Nation, Halfway River First Nation and Prophet River First Nation. Several observations about challenges with transportation to work and training challenges for Aboriginal persons living in First Nations communities were reported, A couple were as follows, "..."no job,

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no vehicle...no vehicle, no job"; people do not generally own vehicles..." (T8FNs Community Assessment Team and The Firelight Group Research Cooperative 2012b: row 66) and in Appendix B; Volume 3 Appendix B First Nations Community Baseline Reports, Part 7 Community Baseline Report and EIS Integration Summary Table for Doig River First Nation, Halfway River First Nation, Prophet River First Nation, and West Moberly First Nations.

In addition to historical, social, and systemic barriers, adult residents of these communities face weak on-reserve economic activity and commuting challenges, including higher transportation costs, to access off-reserve jobs. These challenges are reflected in their higher unemployment rates compared to the rate for Aboriginal persons living off-reserve in the LAA. For example, the Halfway River First Nation, located approximately 115 km and a one-and-a-half-hour drive from Fort St. John, has a high unemployment rate, 50% in the 2006 Census. Anecdotal reporting indicates most residents rely on social assistance and those who work rely on seasonal jobs (T8FNs Community Assessment Team and The Firelight Group Research Cooperative 2012a:104) and in Volume 3 Appendix B First Nations Community Baseline Reports, Part 7 Community Baseline Report and EIS Integration Summary Table for Doig River First Nation, Halfway River First Nation, Prophet River First Nation, and West Moberly First Nations. The high unemployment and seasonal work situation is similar for the Prophet River First Nation community, which is located 90 km south of Fort Nelson and 350 km north of Fort St. John.

The earnings of well-qualified Aboriginal persons (age 35 to 54 with college credentials, working 40+ weeks per year, mostly full time) in the LAA are less than their comparable non-Aboriginal counterparts in the LAA. There is also a large difference in earnings in favour of Aboriginal persons living off-reserve (80.9% of the earnings of non-Aboriginal persons) compared to those living on-reserve (54.8% of the earnings of non-Aboriginal persons) (BC Stats No date).

Aboriginal Labour Force and Skills

The occupational profiles of the Aboriginal and non-Aboriginal labour forces in the LAA are summarized in Table 2. A high proportion of the Aboriginal labour force has skills in occupations associated with construction and resource-based primary industries, such as truck drivers, construction labourers, and tradespersons. The non-Aboriginal population has similar proportions of its labour force with these skills. By comparison, these occupation groups account for much lower shares of the province-wide labour force.

Table 2. Labour Force by Occupation, LAA (2006)

Occupation	Aboriginal (%)	Non-Aboriginal (%)
Management	5	8
Business, finance, and administration	11	15
Natural and applied sciences, and related	4	5
Health	2	4
Social science, education, government service, and religion	5	6
Art, culture, recreation, and sport	1	2
Sales and service	26	22

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Trades, transport and equipment operators, and related	28	25
Occupations unique to primary industry	11	10
Occupations unique to processing, manufacturing, and utilities	5	5

NOTES:

Source: Statistics Canada (2007)

Aboriginal persons in the LAA were more likely to be employed as trades, transport and equipment operators, and in sales and service occupations, as well as occupations unique to the primary industry, than were non-Aboriginal persons in 2006. By comparison, non-Aboriginal residents in the LAA were more represented in management and natural and applied sciences occupations than Aboriginal residents.

An example of the trades orientation of First Nations employment is provided in the community profile for West Moberly First Nations, which reported that 16 to 18 of its members are self-employed, with seven member-operated businesses. The focus is on enterprises that serve the oil and gas, forestry, and construction industries (Volume 3 Appendix B First Nations Community Baseline Reports, Part 7 Community Baseline Report and EIS Integration Summary Table for Doig River First Nation, Halfway River First Nation, Prophet River First Nation, and West Moberly First Nations).

Educational attainment is an important factor in the employment situation of the Aboriginal labour force and its occupational distribution. The gap in education levels between Aboriginal and non-Aboriginal persons in the LAA was similar to that of the province. High school non-completion rates for Aboriginal youth have been a major public policy concern for several years. A high school diploma is an important qualification across economic sectors. The unemployment rate in 2006 for Aboriginal persons aged 35 to 54 in the LAA without high school graduation was 20.0%; for those with a high school diploma, the unemployment rate was a much lower 8.1%. The high school completion rates in the LAA for Aboriginal and non-Aboriginal residents (aged 25 to 64) were low in both cases: 25% and 29% respectively, but similar to the provincial levels. There was a gap, however, between Aboriginal persons in the LAA living off-reserve and those who reside on-reserve; the latter's high school completion rate is much lower, 15%, compared to 28% for the former group.

Although the high school graduation rates are similar between Aboriginal and non-Aboriginal persons in the LAA, the gap in their post-secondary qualifications rates is large, 34% versus 51%, respectively. The post-secondary qualifications rate for Aboriginal persons in the LAA is low within the provincial Aboriginal population; the current province-wide post-secondary qualifications rate is 48.9% for Aboriginal persons (BC Stats 2012b).

Although researchers have found that insufficient educational qualifications are the main barrier for Aboriginal persons when accessing employment opportunities (MNP 2012; Sharpe et al. 2009), they are not the only barriers. Sharpe et al. (2009) found that Aboriginal persons with the same level of educational qualifications as a non-Aboriginal person are likely to be unemployed, pointing to other barriers at play. In a survey-based study for Industry Training Authority, MNP (2012) cited these other barriers:

Lack of readiness and awareness, e.g., at community level, relative to life skills

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- Geographic barriers, e.g., access to transportation, ability to relocate
- Funding, e.g., for individuals, for programs
- Difficulty in securing employer sponsorship
- Lack of Aboriginal awareness within workplaces

The Baseline Community Profile of Doig River First Nations, Halfway River First Nation, Prophet River First Nation and West Moberly First Nations cited the following employment barriers: lack of child care, lack of education and training, isolated location and poor transportation options, emotional health issues, alcohol and drug problems, lack of life skills, higher-than-average health concerns and disabilities, racism/discrimination at work sites, destructive nature of resource extraction jobs, and greater exposure to economic downturns (T8FNs Community Assessment Team and The Firelight Group Research Cooperative 2012a:231–232) and in Volume 3 Appendix B First Nations Community Baseline Reports, Part 7 Community Baseline Report and EIS Integration Summary Table for Doig River First Nation, Halfway River First Nation, Prophet River First Nation, and West Moberly First Nations).

The industries in the LAA in which Aboriginal and non-Aboriginal persons work are similar. Both segments had about one-fifth of their labour force working in resource-based industries, mainly oil and gas, and forestry. In 2006, Aboriginal persons in the LAA were more likely to be employed in public administration and construction than their non-Aboriginal counterparts. Non-Aboriginal persons were more represented in business services, in wholesale trade, and in professional, scientific, and technical services. The industry distribution for the Aboriginal and non-Aboriginal labour forces in the LAA is summarized in Table 3.

Table 3. Labour Force by Industry, LAA (2006)

Occupation	Aboriginal (%)	Non-Aboriginal (%)
Agriculture and other resource-based industries	20	21
Construction	13	10
Manufacturing	5	6
Wholesale trade	2	4
Retail trade	12	11
Finance and real estate	3	4
Health care and social services	5	6
Educational services	5	6
Business services	14	16
Other	20	17

NOTES:

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Source: Statistics Canada (2007)

There are limited data on occupational and industry characteristics of residents of First Nations communities. The census data (Table 4) show that public administration forms a sizable share of employment in the Doig River First Nation community.

Few First Nations communities in B.C. have large-scale employers within the boundaries of their Indian Reserves. The situation in the First Nations communities in the LAA is typical of most communities in the province; the band administration and First Nation health and education services are the main in-community employers. In addition, there are small construction, forestry service, and oil and gas service companies that are operated by a First Nation or by a First Nation member living in and basing their company in the Indian Reserve community. For example, the Community Profile report for Doig River First Nation stated that "Main economic activities in the community of Doig River include community administration, oil and gas work (seismic, facility construction, maintenance, first aid and safety, and reclamation), forestry, general labour, and agriculture. On-reserve labour also staffs the on again, off again convenience store, learning centre and daycare centre." (T8FNs Community Assessment Team and The Firelight Group Research Cooperative 2012a:92) and in Volume 3 Appendix B First Nations Community Baseline Reports, Part 7 Community Baseline Report and EIS Integration Summary Table for Doig River First Nation, Halfway River First Nation, Prophet River First Nation, and West Moberly First Nations.)

Table 4. Labour Force by Industry Group, First Nations in the LAA (2006)

Occupation	Public Administration	Services-Producing Industries	Goods-Producing Industries
Doig River First Nation	30.8	23.1	46.2
B.C. Indian Reserve communities	21.3	48.6	30.0

NOTES:

Source: Statistics Canada (2007)

Effects Assessment

An Aboriginal labour market (or sub-market) exists within the LAA, which is based on Aboriginal labour force supply and LAA-based employer demand, including employment demand generated by the Project. There are also labour markets in the LAA based on community geographies, including First Nations communities.

In Section 17.4.1 of the EIS, there is an assessment of the labour demand change associated with the Project's construction expenditure, including the amount (in person-years) and occupational characteristics of direct, indirect, and induced employment generated in the LAA and the province. The results of this assessment of Project-generated labour demand are directly applicable to the Aboriginal labour market, as the change in employment demand stemming from the Project potentially affects employment opportunities for members of the Aboriginal labour force.

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The Project's labour demand is compared to baseline and forecast Aboriginal labour supply to assess potential effects on the Aboriginal labour market in the LAA and on the labour markets of First Nations communities in the LAA. The Aboriginal labour force, although a segment of the labour force in the LAA, has its own distinct attributes, including size of the labour force, residential location of labour force members, number of unemployed, occupational skills, educational attainment, and social and historical circumstances, as described in Section 17.3.5.

Adverse effects would occur if members of the Aboriginal labour force in the LAA were unable to access, fairly and equitably, Project employment opportunities.

As outlined in Section 17.4.2, the local capacity to help fill Project employment demand is two-dimensional; one dimension is the number of unemployed persons that comprise the residual portion above the 5% natural unemployment rate, and the other is the occupational skills capabilities of unemployed persons within the LAA. This unemployed part of the labour force with crafts skills presents the local capacity to fill a minority, an estimated 5% to 20% of the Project's crafts employment demand.

Although the Aboriginal labour force is a small proportion (approximately 10%) of the total labour force in the LAA, it has historically comprised a much higher portion, one-fifth to one-third, of the total unemployed in the LAA. From the point of view of the size of the pool of unemployed persons in the LAA, the Aboriginal labour force could fill a sizable minority of the local share of crafts employment. This contribution is subject to the Aboriginal unemployed having appropriate experience and abilities to fill these positions, including trainee positions, and having fair and equitable access to these Project employment opportunities.

The available data on the occupational skills of Aboriginal persons in the LAA (as described in Section 17.3.5.2) point to a portion of the Aboriginal labour force having certain qualifications to fill Project crafts positions. Almost 30% of the Aboriginal labour force has occupational skills that fall into the trades, transport, and equipment operators and related category. Data are not available on the occupational skills of the Aboriginal unemployed in the LAA, but if their occupational distribution is the same as for the whole Aboriginal labour force in the LAA, then, at this time, approximately 100 unemployed Aboriginal persons in the LAA may have suitable skills to fill crafts positions in the Project's labour force. This amount or capacity will vary with the number of unemployed in the Aboriginal labour force and the composition of their capabilities.

Another potential source of capacity to help fill labour demand in the Aboriginal population is the group of adults who are not currently part of the Aboriginal labour force. The 2011 participation rate of the Aboriginal labour force was seven percentage points under the rate for non-Aboriginal persons (BC Stats 2012a). If the Aboriginal participation rate was the same as the rate for non-Aboriginal persons, then there would be approximately 350 more persons in the Aboriginal labour force in the LAA. The occupational qualifications of these persons not in the current Aboriginal labour force are not known.

The Project employment demand also presents a potential opportunity for underemployed Aboriginal persons to secure more desirable work and wages or salary, possibly in apprenticeship or operator positions. A less-qualified unemployed person could potentially fill the position they left. Movement from employment in another entity to a Project-related position could result in drawing down unemployment if a local unemployed person moves into the paid workforce as a result. This movement also contributes to improved utilization of labour capacity in the LAA.

The full or even partial realization of this potential employment in the Project's construction phase will not occur in the absence of direct efforts to address the challenges and barriers to securing and maintaining suitable employment that are faced by many in the Aboriginal labour

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force. There has been strong demand for labour in the LAA, which is reflected in relatively low overall unemployment rates since 2003 and the extensive sourcing of labour from outside the LAA, yet the Aboriginal unemployment rate in the LAA remains high relative to the non-Aboriginal population over this period. This set of circumstances indicates that there are employment challenges and barriers for many members of the Aboriginal labour force in the LAA, even in a situation of strong employment demand.

The Treaty 8 First Nations' Impact Pathways Report observed that:

"in general, there are also strong concerns by the T8FNs that even beneficial effects they do encounter are likely to be less beneficial for them than is likely for other, non-Aboriginal populations, due to a variety of built-in systemic hurdles to full engagement in the wage economy by the T8FNs and their members...There is a strong impression that outsiders and non-Aboriginal people are most likely to benefit from Site C" (T8FNs Community Assessment Team and The Firelight Group Research Cooperative 2012b:24-25) and in Volume 3 Appendix B First Nations Community Baseline Reports, Part 7 Community Baseline Report and EIS Integration Summary Table for Doig River First Nation, Halfway River First Nation, Prophet River First Nation, and West Moberly First Nations). Several similar observations about barriers faced by the Aboriginal labour force in regard to securing employment associated with the Project were made in the Site C Initial Impact Pathways Report. Another example is "Variety of systemic hurdles to maximizing T8FNs engagement in employment during construction and operations of Site C, should it proceed; lack of training, low educational status, stigma of working on this project and psycho-social effects, lack of quality work environment in primarily non-Aboriginal companies; etc.; also, relatively short-term nature of construction; what incentive is there for T8FNs to engage"

-T8FNs Community Assessment Team and The Firelight Group Research Cooperative 2012b) and in Appendix B, row 64; Volume 3 Appendix B First Nations Community Baseline Reports, Part 7 Community Baseline Report and EIS Integration Summary Table for Doig River First Nation, Halfway River First Nation, Prophet River First Nation, and West Moberly First Nations

An adverse effect would also occur if Project demand for labour during the construction phase results in staffing gaps in the organizations and enterprises located in First Nations communities (i.e., Indian Reserve communities) due to some of their employees leaving the community to take up Project construction employment.

There is an observation in the Treaty 8 First Nations' Impact Pathways Report in regard to the Project that "...out-migration of those local people with highest business acumen impacts on both the person leaving (loss of connection to home, subject to increased social isolation in a non-Aboriginal community) and the people left behind (family cohesion, "brain drain", reduced capacity to run community infrastructure)." (T8FNs Community Assessment Team and The Firelight Group Research Cooperative 2012, Appendix B, row 50) and in Volume 3 Appendix B First Nations Community Baseline Reports, Part 7 Community Baseline Report and EIS Integration Summary Table for Doig River First Nation, Halfway River First Nation, Prophet River First Nation, and West Moberly First Nations).

Since these small First Nations communities have high levels of unemployment and the on-reserve organizations and businesses have relatively small staffs, then many staffing gaps due to movement of persons from the employ of a First Nation community entity to an off-reserve entity associated with Project construction could be filled by unemployed on-reserve residents or by sourcing suitably qualified persons from outside the community. Employment demand in the LAA has been strong since 2003. Future employment growth in the LAA is

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projected to be similarly strong, as outlined in Section 17.3.4. The Project will add incrementally to this employment growth, and its contribution will vary in scale over the construction schedule. It will attract some persons from businesses and organizations based in First Nations communities, but this, in part, is the expected churn in employment when persons seek new opportunities and others fill their former positions. The Project will contribute to staffing pressures that these small communities face now and will likely face even in the absence of the project.

Section 18 (Regional Economic Development):

Business Profile - Aboriginal Peoples

Businesses owned by Aboriginal persons and organizations are found in First Nations communities and non-Aboriginal communities (both incorporated and unincorporated) in the LAA. Information and data have been collected for this section from several sources to describe them.

The main source of data to assist with identifying the number, size, and industry of businesses for geographic areas in Canada is Statistics Canada's Business Register. The Business Register data for the LAA cited in Section 18.3.1.1 includes businesses owned by Aboriginal persons and organizations, as well as non-Aboriginal persons and organizations. However, there is no ownership breakdown in this data, as Aboriginal identification of ownership is not collected for the Business Register initiative. Survey data to track the basic features of Aboriginal businesses is not regularly collected in B.C. or Canada.

The small business (defined herein as a business with 20 or less employees) per capita rate (for the total adult population 25–64 years) in the LAA is approximately 0.09 (calculated with 2011 Business Register data and 2006 Census of Population data). Applying this rate to the Aboriginal population (25–64 years) in the LAA gives an estimate of approximately 330 businesses owned by Aboriginal persons or organizations in the LAA. The proportion of small businesses in the LAA that are construction, transportation, or primary industry focused (forestry for example) is 42% (based on Table 20-6 in the Business Register data). These are the types of small businesses that are likely to be interested in seeking contracts connected with the construction of the Project. Using this parameter, there could be an estimated 140 small businesses owned by either Aboriginal persons or organizations in the LAA that would be in a position to consider seeking construction, excavation, transportation, and related contracts associated with the project.

As described in Section 18.3.2.3, BC Hydro created a Site C Business Directory for businesses to state their characteristics and capabilities for undertaking contractual work associated with the Project. As of March 12, 2012, there were 380 registrants that listed their business address; 178 are based in B.C., 48 had self-identified Aboriginal ownership, and all but four of the latter were Aboriginal businesses based in the LAA. The Aboriginal business registrants based in the LAA accounted for 12% of the total registration and 14% of the B.C. registration.

Interest and activity in business is growing within First Nations communities in the LAA. West Moberly First Nations is an example as it seeks to "...move from a reactive labour-oriented resource extraction economy involved at the front end of development (e.g., cutting seismic lines) toward value-added, higher skill and long-term revenue-generating opportunities (e.g., equity shares in resource development companies)" (T8FNs Community Assessment Team and The Firelight Group Research Cooperative 2012a:125). Sources included Volume 3 Appendix B First Nations Community Baseline Reports, Part 7 Community Baseline Report and EIS

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Integration Summary Table for Doig River First Nation, Halfway River First Nation, Prophet River First Nation, and West Moberly First Nations.

Although interest and activity is growing, barriers and challenges for Aboriginal persons in Canada to start and grow businesses have been noted in several reports and studies (Federal–Provincial Ministers Working Group on Aboriginal Participation in the Economy 2001). It summarized the major documented barriers and challenges, including:

Inadequate connections and linkages between Aboriginal communities and traditional economies with the mainstream economy

Systemic barriers, misconceptions, and stereotypes about Aboriginal people

Many Aboriginal businesses and communities lack business expertise in marketing, bookkeeping, manufacturing, and management skills

Aboriginal businesses often lack equity and have difficulty acquiring adequate business financing

Access to loan guarantees, and equity and debt financing are issues for both business and community development

More recent reports that surveyed Aboriginal business owners and representatives of First Nations economic development corporations noted similar barriers and challenges (CCAB 2011; CCAB and Environics Research Group 2011). The Site C Impact Pathways Report (T8FNs Community Assessment Team and The Firelight Group Research Cooperative 2012b) itemized the barriers in the context of the LAA "...barriers identified by T8FNs include: the 'old boys network', lack of interest on the part of potential joint venture partners, lack of start-up funding, high housing costs, and lack of sufficient resources to purchase equipment; there is a lack of training in business development; First Nations lack experience in many sectors; lack of knowledge among members about how to start up and operate a business; failure to properly prepare for the next contract; limited activity and industry partnership agreements in PRFN area" (Appendix B, row 51 in T8FNs Community Assessment Team and The Firelight Group Research Cooperative 2012b).

Table 5 summarizes the types and range of businesses in the First Nations communities of Doig River First Nation, Halfway River First Nation, Prophet River First Nation, and West Moberly First Nations.

Table 5. Current Business Activity of First Nations in the LAA (2012)

First Nation	Business Activity
Doig River First Nation	 Economic development function in band administration First Nation-owned businesses, including Doig River Energy, an oil and gas industry service company 2011 directory of member-owned businesses listed 13 enterprises Road building, general contractors, forestry, oilfield (maintenance, facility construction, turnarounds), seismic, first aid and safety services, reclamation
Halfway River First Nation	 First Nation-owned ranch 2011 estimate of five on-reserve members with businesses Gravel excavation and sales
Prophet River	First Nation-owned Prophet River Operations Ltd.

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First Nation	 Restaurant and commercial services, camps, and catering Four or five member-owned contracting companies
West Moberly First Nations	 Several First Nation-owned businesses, including Dunne-za Ventures LP (contract services for mineral development and forestry sectors), joint venture in Dokie Wind Farm, Tsay-Keh-Ne-Cheleh Ranch, partnerships in two non-replaceable forest licences with Canfor, and Dunne-Za Lodge (on Moberly Lake) Gravel extraction and sales Estimate of seven member-owned businesses Logging and backhoe contracting business

NOTE:

SOURCE: VOLUME 3 APPENDIX B FIRST NATIONS COMMUNITY BASELINE REPORTS, PART 7 COMMUNITY BASELINE REPORT AND EIS INTEGRATION SUMMARY TABLE FOR DOIG RIVER FIRST NATION, HALFWAY RIVER FIRST NATION, PROPHET RIVER FIRST NATION, AND WEST MOBERLY FIRST NATIONS)

Typically, each First Nation in the LAA has at least one First Nation-owned business that provides a range of contracting services, such as excavation, road building, vegetation clearing, and first aid, to primary resource industries in the region. Table 6 summarizes the sectoral focus, services, and clients of several First Nations-owned companies.

Table 6. First Nations-Owned Contracting Businesses in the LAA

Company	Business Activity
Dunne-za Ventures LP (West Moberly First Nations)	 Sectoral focus – oil & gas, forestry and mining sectors Contracting services – right-of-way clearing, road building, reclamation, logging, trucking, bridge design, first aid, and project management Clients – such as Encana, Shell Canada Energy, Devon Canada, Canfor, West Fraser, Tembec, Pine Valley Coal, Peace River Coal, and Western Canadian Coal Operations base – Fort St. John, B.C.
Duz Cho Construction LP (McLeod Lake Indian Band)	 Sectoral focus – oil & gas, wind energy, and mining sectors; a sister company, Duz Cho Logging Ltd., is a full-phase timber harvesting and forest road construction contractor Contracting services – right-of-way clearing, road building, reclamation, logging, trucking, excavation, camp and catering services, bulk fuel supply, and card lock systems Clients – such as Shell Canada, Walter Energy, Teck Resources, BC Hydro, Mortenson Canada, Arcis Corporation, and LXL Consulting Operations base – Chetwynd, B.C.
4 Evergreen Resources LP (Saulteau First Nations)	 Sectoral focus – oil & gas, forestry, and mining sectors Contracting services – right-of-way clearing, road building, reclamation, logging, trucking first aid, bridge design, and project management Clients – such as EnCana, Shell Canada Energy, Devon Canada, Canfor, West Fraser, Tembec, Pine Valley Coal, Peace River

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	Coal, and Western Canadian Coal Operations base – Moberly Lake, B.C.
Blueberry River Enterprises GP Ltd. (Blueberry River First Nation)	 Sectoral focus – oil & gas, forestry, and mining sectors Contracting services – Construction, alteration, repair, and development of earthworks, including right-of-way clearing, seismic clearing, road building, and site clearing; it also provides air curtain incineration services for vegetation clearing Clients – not named, but Blueberry River Enterprises GP Ltd. was nominated by Spectra Energy for a B.C. Aboriginal Business Award in 2011 Operations base – Charlie Lake, B.C.

NOTE:

Sources: Dunne-za Ventures (2012); Duz Cho Construction LP (2012); 4 Evergreen Resources LP (No date); Blueberry River Enterprises GP Ltd. (No date)

Since 2010, and in accordance with BC Hydro's Aboriginal Procurement Policy, Site C's Engineering team provided direct award contracts to Blueberry River Enterprises (a Blueberry River First Nations company) and 4 Evergreen Resources (a Saulteau First Nations company) to carry out early season work in advance of the finalization of a competitive process for general construction services. In that process, two Aboriginal businesses were successful in receiving contracts: Renegade Construction Inc. (owned by a Doig River First Nation member) and Dunne-za Ventures (a West Moberly First Nations company). All four companies provided general contractor support for the engineering field investigation program throughout the project area.

Two regional organizations have specific mandates to support development of Aboriginal businesses: Treaty 8 Tribal Association and Northeast Aboriginal Business Centre. The latter provides small business planning and operations advisory services to Aboriginal persons and Aboriginal businesses in northeast B.C. from its office in Fort St. John (Northeast Aboriginal Business Centre No date). The former has a community and economic planning function, which assists its First Nation members to create economic self-sufficiency (Treaty 8 Tribal Association No date). It has an economic development strategy project underway that will benefit the following Treaty 8 communities: Doig River First Nation, Halfway River First Nation, Prophet River First Nation, Saulteau First Nations, and West Moberly First Nations.

Section 28 (Population and Demographics):

Population: Age, Gender, Marital Status, and Household Characteristics

Demographic characteristics are described for the LAA and for Aboriginal communities within the LAA. Demographic data were not yet available from the 2011 Census.

The median age of the population living in the LAA in 2006 was 34.2 years, compared to 40.8 years for the province (BC Stats 2010). In 2010, the median age of people living in the LAA was estimated to be 34.7 years (BC Stats 2011a).

Males made up 51% of the population in 2006, as compared to 49% for the province (BC Stats 2010).

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The marital status of the population in the LAA at 49% (of the population 15 years and older) is comparable to the provincial rate of 50%. The LAA has a relatively higher proportion of single and separated persons at 39%, as compared to 35% provincially.

In 2006, the average size of private households in the LAA was 2.6 persons versus 2.5 persons for the province. The lower proportion of one-person households and the higher share of multiple-person households in the LAA are consistent with the higher average household size.

For families (excluding one-person private households), there was an average of 1.1 children at home, compared to 1.0 provincially.

The Aboriginal population in the LAA was approximately 12% of the overall population of the LAA. The median age of the Aboriginal population is young, at 26 years compared to 34 generally. The gender split and mobility data for the Aboriginal population mirror that of the general population, in that there are more males than females and there is considerable population movement.

Population and demographic information for Aboriginal people in the LAA is presented in Table 7

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Table 7. First Nation Population Profile in the Local Assessment Area (Peace River Regional District), 2006

Demographic Description	Aboriginal Population (On- and Off-reserve)	Percentage (%)	Non-Aboriginal Population	Percentage (%)
Population count	6,985	-	58,264	-
Median age	26.0	-	34.2	-
Gender				
Male	3,615	51.7	29,895	51.3
Female	3,375	48.3	28,370	48.7
Mobility				
Lived at the same address 1 year ago	5,380	78.4	46,320	81.1
Lived at the same address 5 years ago	3,210	50.0	28,750	53.4

Note:

Source: Statistics Canada (2007a, 2007b)

Population and demographic information for the First Nations communities of Doig River First Nation, West Moberly First Nations, Prophet River First Nation and Halfway River First Nation are shown in Table 8. The on-reserve populations are small but fluctuate over time: Doig River First Nation had 139 people living on-reserve in 2001 and 128 in 2011. Halfway River First Nation also saw a decline in their on-reserve population, from 160 in 2003 to 145 in 2012. Each of the Doig River, Prophet River, and Halfway River First Nations saw population increases of 15% to 30% between census years. West Moberly population change is difficult to estimate, as information about its population in 2006 was not available. Mobility statistics are not available for all communities; however, for West Moberly First Nations and Prophet River First Nation, less than 50% of members lived in the same community five years prior and West Moberly First Nations saw only 20% of members living in the same community five years earlier.

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Table 8. First Nation Community Population Profiles

First Nation	Populat	ion	Population Under the Age of 15 (%) (2011)	Gende On-Re Popul (2012)	eserve ation	Gender – Off-Reserve Population (2012)		On-Reserve population		Mobility (% of Population) (2006) a
	(2003)	(2012)		Male (%)	Female (%)	Male (%)	Female (%)	(2003)	(2012)	
West Moberly	NA	237	70.0	41 (48)	44 (52)	68 (46)	81 (54)	NA	85	25
Doig River	NA	NA	NA	NA	NA	NA	NA	139 b	128 c	NA
Prophet River	195	260	25.8	55 (52)	50 (48)	NA	NA	NA	105	50
Halfway River	225	255	27.1	80 (55)	65 (45)	NA	NA	160	145	70

NOTES:

Population information is not consistently available for First Nations groups on an annual basis. As such, this table reports on the closest approximate annual population.

- a Mobility refers to the population that has lived in the same community for five or more years
- b Population information for Doig River First Nation is for 2006
- c Population information for Doig River First Nation is for 2011

NA - data not available

Source: Volume 2 Appendix B First Nations Community Baseline Reports, Part 7 Community Baseline Report and EIS Integration Summary Table - Doig River First Nation, Halfway River First Nation, Prophet River First Nation, West Moberly First Nations

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Appendix B: List of EIS Mitigation Measures

The following mitigation measures are described in the EIS:

Section 17 (Labour Market):

- Enhance local labour market participation via training and skill development, focused on increasing the local labour market participation rate and skill level of LAA population
- Provide \$1 million to the Northern Lights College Foundation to fund student bursaries, focusing on trades and skills training to support the development of skilled workers in the LAA
- Enter into a three-year (2011-2014) funding agreement with Northern Opportunities, a
 partnership of the school districts of Fort Nelson, Peace River North, and Peace River
 South, Northern Lights College, local First Nations, industry and local communities, with
 the objective of providing young people with a seamless learning pathway from
 secondary school to post-secondary training, which is open to Aboriginal and nonAboriginal students
- Support Aboriginal training initiatives and students:
 - Consider commitments respecting capacity building, education, and training associated with Aboriginal participation in the labour market
 - Support training, industry, and Aboriginal partnership opportunities in the region
 - Support the North East Native Advancing Society (NENAS) with \$100,000 in funding over two years (2013-2014) to support trades training under its North East Aboriginal Trades Training Program

Section 18 (Regional Economic Development):

- Continue outreach initiatives to make Aboriginal businesses aware of Project contracting opportunities
- Where identified by Aboriginal groups as an interest, BC Hydro will consider commitments respecting capacity building, education, and training associated with Aboriginal participation in labour market opportunities
- Implement a Business Participation Strategy: continue to notify Aboriginal groups of business information sessions, and about opportunities to register with BC Hydro's Aboriginal Business Director (refer to Volume 1 Appendix F Project Benefits Supporting Documentation)
- Continue to engage directly with the Aboriginal business community in the LAA and elsewhere in the province, including providing opportunities to sponsor and participate in Aboriginal business events and conferences
- BC Hydro's Aboriginal Contract and Procurement Policy includes a commitment to increasing Aboriginal participation in providing its goods and services. Activities to achieve this objective include set-asides, direct awards, select tenders, and the inclusion of Aboriginal content in bidding documents
- BC Hydro will seek information from Aboriginal suppliers in the LAA, and from other Aboriginal groups with whom BC Hydro is engaged, about their business capacity and capabilities to provide goods and services for the Project
 - Dedicate \$500,000 of the \$1 million provided to Northern Lights College to Aboriginal student Bursaries
 - Develop a plan for inclusion of Aboriginal persons in its Project contracted workforce, including communication of employment opportunities, and evaluation

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criteria for hiring and training Aboriginal persons in contractor procurement packages

Section 28 (Population and Demographics):

• Procurement of local Aboriginal businesses for Project construction contracts where feasible.

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Appendix C: Sample Aboriginal Inclusion and Reporting Requirement Schedule

APPENDIX L – ABORIGINAL INCLUSION AND REPORTING REQUIREMENTS

Interpretation

Definitions

In this Appendix L – Aboriginal Inclusion and Reporting Requirements, in addition to the definitions set out in GC. 1.1 of Appendix A – General Conditions (Construction) and in Appendix B – Supplementary General Conditions, if any:

"Aboriginal Inclusion Performance Report" has the meaning set out in Section 2.3 of this Appendix L – Aboriginal Inclusion and Reporting Requirements;

"**Aboriginal Inclusion Plan**" has the meaning set out in Section 2.2 of this Appendix L – Aboriginal Inclusion and Reporting Requirements; and

"Aboriginal Opportunities Coordinator" or "AOC" has the meaning set out in Section 3.1 of this Appendix L – Aboriginal Inclusion and Reporting Requirements.

Commitments

Commitments

The Contractor will use reasonable commercial efforts to achieve the following in the performance of the Work:

Provision of business opportunities for Aboriginal Businesses;

Provision of employment opportunities for Aboriginal persons;

Provision of training opportunities for Aboriginal persons;

Aboriginal Inclusion Plan

The Contractor will cause the AOC to prepare and sign a written plan (the "**Aboriginal Inclusion Plan**") that sets out a plan by which the commitments as described in Section 2.1 of this Appendix L – Aboriginal Inclusion and Reporting Requirements for contracting of Aboriginal Business and the employment and training of Aboriginal persons can be achieved in the performance of the Work. The Aboriginal Inclusion Plan will, at a minimum:

- (a) identify specific scopes of the Work which the Contractor and BC Hydro agree have reasonable potential to provide contracting of Aboriginal Businesses and the employment and training of Aboriginal persons in the performance of the Work; and
- (b) identify targets (such as number of employees or dollar value of Work) for contracting with Aboriginal Businesses and employing and training targets for Aboriginal persons in the performance of the Work.

Prior to commencing any Work at the Site the Contractor will submit the Aboriginal Inclusion Plan to BC Hydro under GC 4.21 of Appendix A – General Conditions.

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The Contractor will cause the AOC to update and sign the Aboriginal Inclusion Plan monthly, in consultation with BC Hydro.

Reporting

The Contractor will prepare monthly a report (the "**Aboriginal Inclusion Performance Report**") of the actual amount of:

- (a) the number and value of contracts with Aboriginal Businesses relating to the performance of the Work;
- (b) the number of Aboriginal persons, and number of hours, employed in the performance of the Work; and
- (c) the number of Aboriginal persons, and number of hours, who have received training, and the type of training received;

in the reporting period, together with variances from the targets as set out in the Aboriginal Inclusion Plan, as may be updated under Section 2.2 of this this Appendix L – Aboriginal Inclusion and Reporting Requirements. All information in the Aboriginal Inclusion Performance Report will be separated to identify the specific Aboriginal groups that have been involved in the reporting period.

The Contractor will submit the Aboriginal Inclusion Performance Report as part of its payment applications as described in GC 5.3(a)(iii) of Appendix A – General Conditions.

Aboriginal Opportunities Coordinator

The Contractor will, within 60 days of the Effective Date appoint a person (the "**Aboriginal Opportunities Coordinator**" or "**AOC**") to be a coordinator of opportunities for the involvement of Aboriginal Businesses and Aboriginal persons in the performance of the Work.

Objective of Aboriginal Opportunities Coordinator

The primary objective of the position of the AOC is to identify business opportunities for Aboriginal Businesses and employment and training opportunities for Aboriginal persons, to participate directly or indirectly in the performance of the Work including:

- (a) identifying a match between skill sets and experience in local Aboriginal groups, including but not limited to Blueberry River First Nations, Doig River First Nation, Fort Nelson First Nation, Halfway River First Nation, McLeod Lake Indian Band, Prophet River First Nation, Saulteau First Nations and West Moberly First Nations, and the skill sets the Contractor requires for the performance of the Work; and
- (b) identifying training opportunities to provide the skills required for Aboriginal persons to participate in the performance of the Work.

Qualifications for Aboriginal Opportunities Coordinator

The AOC will be a person who:

- (a) has sufficient knowledge, experience and expertise to understand the Contractor's work plan for the performance of the Work, including;
- (b) the methods the Contractor will use to perform the Work;
- (c) the number and nature of Subcontractors the Contractor intends to engage for the performance of the Work;

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- (d) the amount of labour the Contractor will require from time to time in the performance of the Work, broken down into different activities that will be required for the performance of the Work; and
- (e) the skills and experience the Contractor will reasonably require the labour to have to perform the various Work activities; and
- (f) has the knowledge, experience and expertise as required to assess the capacity of Aboriginal Businesses and Aboriginal persons associated with local Aboriginal groups, including but not limited to Blueberry River First Nations, Doig River First Nation, Fort Nelson First Nation, Halfway River First Nation, McLeod Lake Indian Band, Prophet River First Nation, Saulteau First Nations and West Moberly First Nations that might be employed in the performance of the Work; and
- (g) has the interpersonal skills as required to meet with representatives of the Contractor, BC Hydro and with Aboriginal Businesses and Aboriginal persons as described in this Schedule 16 [Aboriginal Inclusion] for the purpose of identifying opportunities for the contracting of Aboriginal Businesses and the employment and training of Aboriginal persons in the performance of the Work.

Contractor Briefings of Aboriginal Opportunities Coordinator

No less than once every two weeks the Contractor's senior Site management and BC Hydro's senior Site management will meet with the AOC to cooperate and collaborate on ways to achieve the commitments as set out in Section 2.1 of this Schedule, which collaboration will at a minimum include:

- a review of the existing skills and experience of identified Aboriginal Businesses who
 have expressed interest in contracting and Aboriginal persons who have expressed an
 interest in being employed in the performance of the Work or who potentially might be
 interested;
- (b) a review of the Contractor's Work plan for the next 12 months to identify potential and practical contracting of Aboriginal Businesses and the employment and training of Aboriginal persons;
- (c) a review and update of the Aboriginal Inclusion Plan as described in Section 0 of this Appendix L Aboriginal Inclusion and Reporting Requirements; and
- (d) a review of the Aboriginal Inclusion Performance Report.

Aboriginal Opportunities Coordinator Duties

The AOC will prepare and sign the Aboriginal Inclusion Plan and all updates to the Aboriginal Inclusion Plan, all as required under Section 2.2 of this Appendix L – Aboriginal Inclusion and Reporting Requirements.

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Appendix D: Sample Aboriginal Inclusion Evaluation Criteria

SCHEDULE 8 – ABORIGINAL INCLUSION

ABORIGINAL INCLUSION						
Title	Proposal Contents					
Aboriginal	The Proponent should submit the following information:					
Inclusion	Information regarding the Proponent's Aboriginal Inclusion, supported by relevant documentation. See Section [xxx] of the RFP for the definition of "Aboriginal Business" and other relevant terms.					
	Describe how the Proponent's business practices support or benefit Aboriginal peoples, i.e. training and/or mentoring programs for Aboriginal employees and/or Aboriginal subcontractors that may be involved in performing the Work.					
	State the names of Aboriginal persons employed, including the date of employment, position, and their expected role or activities in performing the Work.					
	Include a draft of the Aboriginal Inclusion Plan as described in Section 2.2 of Appendix L [Aboriginal Inclusion and Reporting Requirements] of the Agreement.					

ATTACHMENT A EVALUATION CRITERIA

	Evaluation Criteria	Weighting
1.	Overall Cost to BC Hydro	40%
2.	Proponent's capacity and capability to perform the Work	25%
3.	The Proponent's qualifications, expertise and experience, including any Subcontractor(s)	20%
4.	The Proponent's record regarding Quality, Safety and Protection of the Environment	10%
5.	Aboriginal Inclusion	5%
6.	Financial and Bonding Capacity	Pass / Fail

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It is anticipated that the Proponent that is evaluated to have the highest weighting will be selected as the Preferred Proponent, but BC Hydro reserves the right for the Evaluation Committee to decline to recommend any Proponent which the Evaluation Committee, acting reasonably and fairly, determines would, if selected, result in greater overall cost or material risk to BC Hydro as compared to another Proponent, considering any relevant factors, including a Proponent's financial resources, safety record, claims and litigation history, work history and environmental record.

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