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October 28, 2022

Sara Hardgrave
Acting Commission Secretary and Manager
Regulatory Services
British Columbia Utilities Commission
Suite 410, 900 Howe Street
Vancouver, BC V6Z 2N3

Dear Sara Hardgrave:

**RE: British Columbia Utilities Commission (BCUC or Commission)
British Columbia Hydro and Power Authority (BC Hydro)
Mandatory Reliability Standards Assessment Report No. 16 (Report No. 16)
Extension in Accordance with Section 3(2) of
the Mandatory Reliability Standards Regulation**

BC Hydro writes to request an extension in accordance with section 3(2) of the Mandatory Reliability Standards Regulation (**Regulation**) to ensure compliance with the Regulation and to accommodate the current assessment process.

Extension Request for Report No. 16

Section 3 of the Regulation sets out that BC Hydro must provide a report to the BCUC within one year of the date that a reliability standard is adopted by the Federal Energy Regulatory Commission (**FERC**). Subsection 3(2) of the Regulation provides for an application to be filed to extend the time by which BC Hydro must provide this report.

For efficiency, rather than submitting a separate assessment report for each reliability standard, BC Hydro batches reliability standards adopted by FERC within BC Hydro's annual assessment period of December 1 to November 30 (**Assessment Period**) and files one assessment report with the BCUC each year. As a result, certain reliability standards included in the Report No. 16 Assessment Period (December 1, 2021 to November 30, 2022) will have been adopted by FERC more than one year prior to the filing date of Report No. 16, to be filed on May 1, 2023. Accordingly, BC Hydro requests an extension to allow it to include its assessment for those reliability standards adopted by FERC between December 1, 2021 and April 30, 2022 to go beyond the one year that is outlined in the Regulation.

Extension Request for Reports No. 17-20

BC Hydro has annually requested, and the Commission has approved, an extension of the deadline for filing each assessment report over the past decade to accommodate the current assessment process, which has proven to be efficient and effective. Similar extension requests will be required each year the current assessment process is followed. To reduce the administrative burden on BC Hydro and the Commission, in addition to the extension for Report No. 16 set out above, BC Hydro requests an extension for the following four reports (i.e., Reports No. 17-20), each to be filed within five months of the end of the relevant Assessment Period.

BC Hydro notes that there could be a scenario where it may need to file an additional Assessment Report, for example where BC Hydro needs to work in parallel with interconnected entities to secure the real-time reliability of the system (e.g., for the Balancing Authority and Reliability Coordinator functions). As set out in Assessment Report No. 15, should BC Hydro or the Commission determine that a particular reliability standard is sufficiently critical to reliability that it warrants immediate implementation, BC Hydro confirms that it would file a reliability standard-specific assessment report and not wait until its next 'batch' assessment report.

For further information, please contact Alicia Henderson at 604-623-4381 or by email at BCHydroRegulatoryGroup@bchydro.com.

Yours sincerely,



Chris Sandve
Chief Regulatory Officer

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