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December 17, 2021

Mr. Patrick Wruck
Commission Secretary and Manager
Regulatory Support
British Columbia Utilities Commission
Suite 410, 900 Howe Street
Vancouver, BC V6Z 2N3

Dear Mr. Wruck:

RE: Project No. 1598932
British Columbia Utilities Commission (BCUC or Commission)
British Columbia Hydro and Power Authority (BC Hydro)
Mandatory Reliability Standards (MRS) TPL-001-4 Assessment Report
Semi-Annual Report No. 6
Responses to BCUC Staff Information Request No. 1

BC Hydro writes to provide its responses to BCUC Staff Information Request No. 1.

1.0 Reference: SEMI-ANNUAL REPORT NO. 6
BCUC Order R-27-18A, Appendix B, p. 8; Mandatory
Reliability Standards TPL-001-4 Assessment Report, dated
July 30, 2021, p. 1
Requirement R4

By Order R-27-18A, issued on June 28, 2018, effective dates were established for the implementation of Mandatory Reliability Standards (MRS) TPL-001-4. On page 8 of Appendix B states the effective dates are "R2-R6 and R8: July 1, 2020."

On page 1 of Semi-Annual Report No. 6, BC Hydro provides the following information project information for Requirement R2:

BC Hydro Cost Incurred to Date		BC Hydro Updated Cost Estimate		Cost Variance		Completion Status
One Time (\$)	Ongoing (\$)	One Time (\$)	Ongoing (\$)	One Time (\$)	Ongoing (\$)	Complete, In progress, not yet started
\$8,240	\$0	\$400,000	Unknown at this time	\$0	\$0	In Progress

- 1.1. Please confirm that Requirement R4 has not been fully implemented by the July 1, 2020 effective date, as approved by the BCUC.

RESPONSE:

Not confirmed. BC Hydro fully implemented Requirement R4 as of the effective date of July 1, 2020. BC Hydro has completed its assessments in accordance with TPL-001-4 Requirement R4. These assessments have identified events and contingencies that may require Corrective Action Plans which BC Hydro is considering in accordance with the timelines set out in Section A.5 of the Standard.

- 1.1.1. If confirmed, please explain the cause of the delay and provide the implementation plan and the expected date of completion.

RESPONSE:

Not applicable, please refer to BC Hydro's response to BCUC IR 1.1.

- 1.1.2. If confirmed, please describe the current residual risk and any potential impact to the Bulk Electrical System.

RESPONSE:

Not applicable, please refer to BC Hydro's response to BCUC IR 1.1.

- 1.1.3. If not confirmed, please explain why the status is still "In Progress."

RESPONSE:

The completion status for Requirement R4 was marked as "in progress" in error. BC Hydro intended to signal that it is in the process of considering whether the one-time expenses allocated for undertaking a stakeholder process per the Footnote 12 process set out in Attachment 1 of the Standard were required.

The stakeholder process may have been an outcome of the assessments performed under the Standard if the events and contingencies were of the type identified in Table 1 in Attachment 1 of the Standard that allows Non-Consequential Load Loss with a stakeholder process; however, the need for a stakeholder process does not signal that BC Hydro's performance of the Requirement R4 of the TPL-001-4 Standard is not complete. The \$400,000 cost estimate, as reported in our TPL-001-4

Assessment Report¹ filed on May 3, 2017, had been carried forward from prior reports.

Given that Requirement R4 has been fully implemented and BC Hydro has not identified any events or contingencies that require a stakeholder process under the Footnote 12 process set out in Attachment 1 of the Standard, the one-time cost estimate will be revised to \$0 and the status will be reported as “Complete” in our upcoming Semi-Annual Report No. 8, to be filed in July 2022.

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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¹ Letter dated May 3, 2017 – BC Hydro submitting BC Hydro Mandatory Reliability Standards TPL-001-4 Assessment Report (Exhibit B-1).