

Mandatory Reliability Standards

Assessment Report 17 Workshop

January 08, 2024

Presented by:

BCUC

BC Hydro



January 08, 2024

Safety Moment – Are you ready for winter weather?

Winter is great for a lot of reasons...



Winter also brings new safety hazards...



- Keep your feet on the ground
- Winter footwear and clothing
- Be aware of your surroundings
- Plan your travel
- Winter tires
- Adjust your driving

Agenda



<u>Section</u>	<u>Topic</u>	<u>Duration</u>
1	Introductions	15 min
2	Reliability Regulations Landscape in B.C.	20 min
3	Assessment Reports	20 min
4	How to Provide Feedback	20 min
5	Q&A and Closing	20 min

Note: Today's workshop is process oriented. Other questions, e.g., registration/ technical details/ interpretation of standard, etc. should be directed to the appropriate contact.



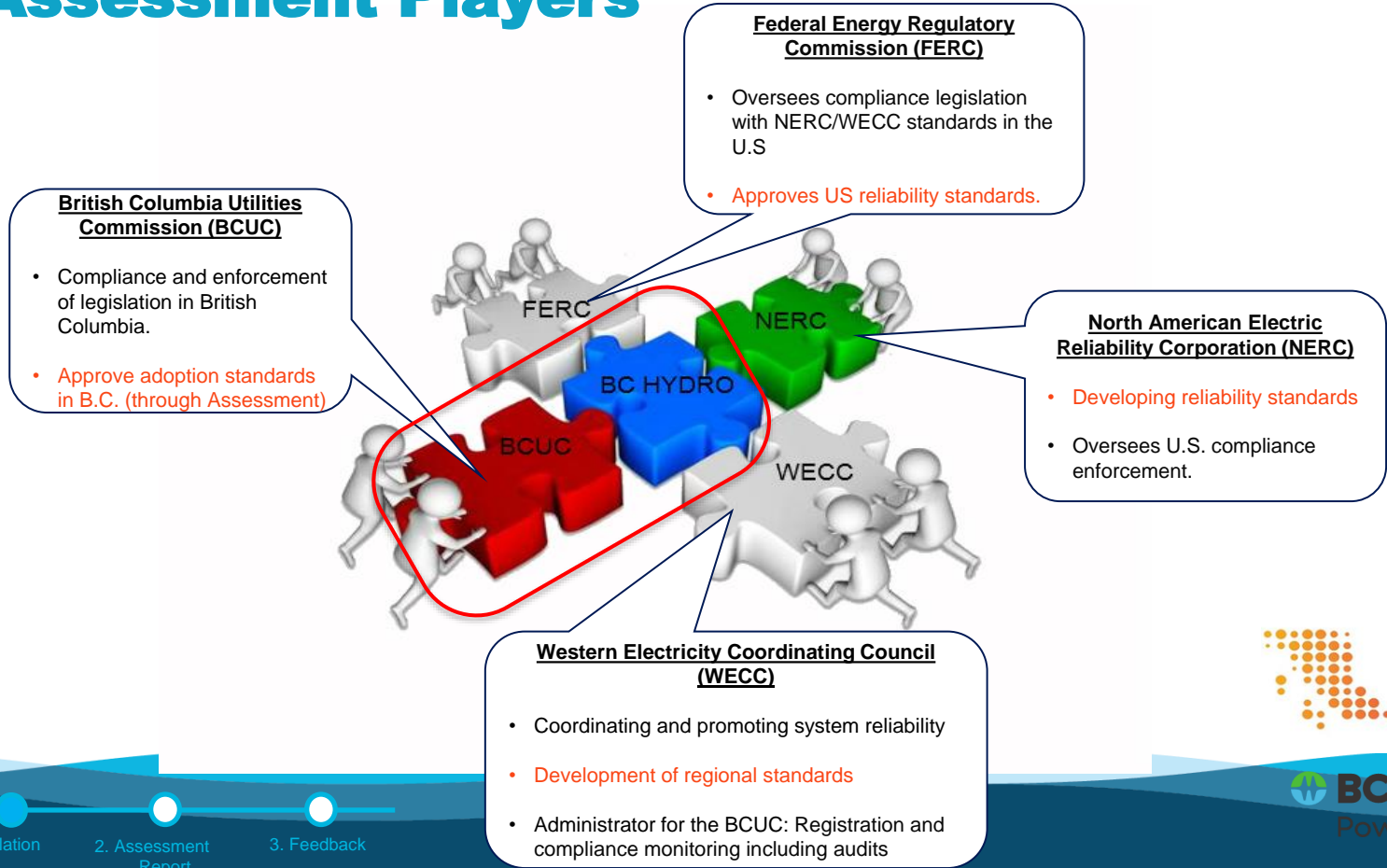
Reliability Regulations Landscape in B.C.

Nicole Manalili,

British Columbia Utilities Commission



Key Assessment Players



Mandatory Reliability Standards (MRS) in B.C.

MRS Legislation

- **2007 British Columbia Energy Plan**

- Included a Policy Action to “ensure that the province remains consistent with North American transmission reliability standards”

- **Utilities Commission Act**

- Section 125.2 establishes the adoption of MRS in B.C., gives the BCUC jurisdiction for MRS oversight in B.C., and assigns BC Hydro the responsibility to review each MRS and report on their suitability for adoption in B.C.
- Recent amendments to the Act and MRS Regulation shifted the applicability of the reliability standards from the Regulation to the Act
- MRS standards may only be fully adopted or rejected by the BCUC and may not be altered or revised. However, the BCUC may specify a BC effective date that would differ from the US effective date.

- **MRS Regulation**

- The provincial government issued the MRS Regulation which directs BC Hydro to provide a report to the BCUC within one year after MRS are adopted by FERC



Mandatory Reliability Standards (MRS) in B.C.

MRS Report Filing Process

- Upon receipt of the Assessment Report, the BCUC makes the report available to the public for comment
- The BCUC considers any comments received in reply to the publication and may issue Information Requests to BC Hydro and/or other Registered Entities

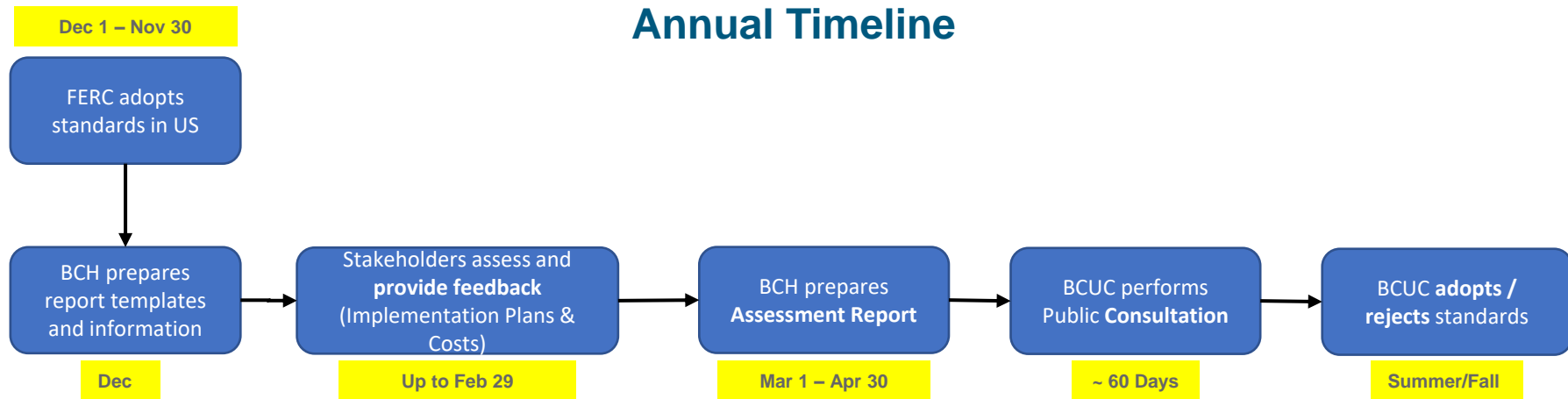
MRS Adoption in B.C.

- The BCUC adopts the MRS assessed in the report if the BCUC considers that the MRS are required to maintain or achieve consistency in B.C. with other jurisdictions that have adopted the MRS
- The BCUC is not required to adopt an MRS if the BCUC determines, after a hearing, that the MRS is not in the public interest



Adopting Mandatory Reliability Standards in B.C.

Annual Timeline



Mandatory Reliability Standards (MRS) in B.C.

MRS Compliance

- The B.C. Government has vested the BCUC with the authority and the responsibility for MRS compliance and enforcement
- The BCUC has the ability to levy monetary penalties for confirmed MRS violations
- The BCUC Rules of Procedure, which includes the Registration Manual, Compliance Monitoring Program and Penalty Guidelines, sets out the administrative framework for the monitoring of compliance with adopted MRS in B.C.
- The BCUC has an administration agreement with WECC to assist with monitoring compliance and registration



Assessment Report Scope

Thomas Graham,
BC Hydro



Assessment Report Scope Definition

The scope of Reliability Standards and Terms for consideration in each annual Report is limited to the following:

- Standards adopted by an Order issued by the Federal Energy Regulatory Commission (**FERC**) in the United States; and,
- Which the Order became effective between December 1st of the previous year to November 30th of the current year.
- Assessment 17 timeframe:
 - *December 1, 2022, to November 30, 2023*



Assessment Report 17 – Scope (1/3)

O&P standards in scope are:

Standard	Status	BC Hydro current recommendation
EOP-011-3	Revised	Abeyance*
EOP-012-1	New	Abeyance**
IRO-010-5	Revised	Assess as normal
MOD-001-1a	Retired	Retire in line with US***
MOD-004-1	Retired	Retire in line with US***
MOD-008-1	Retired	Retire in line with US***
MOD-028-2	Retired	Retire in line with US***
MOD-029-2a	Retired	Retire in line with US***
MOD-030-3	Retired	Retire in line with US***
PRC-002-4	Revised	Assess as normal
TOP-003-6.1	Revised Errata	Assess as normal

* Recommending abeyance for EOP-011-3 as FERC deferred their decision on whether to approve or modify NERC's proposed EOP-011-3 implementation date in the U.S. (and retirement of EOP-011-2) until NERC submits a revised applicability section for EOP-012-1. Therefore, there is a suitability issue as the implementation date for the US is not known.

** Recommending abeyance as EOP-012-1 is expected to be superseded by EOP-012-2 upon the same October 1, 2024, effective date in the U.S. pending FERC approval of EOP-012-2. This will render EOP-012-1 as never being effective, leaving a suitability issue for adoption in B.C. if EOP-012-1 is adopted under Assessment Report No. 17.

*** BCH has recommended to the BCUC through Quarterly Assessment Report No. 4 that the BCUC retire the MOD Standards in alignment with the U.S. effective retirement date of February 1, 2024, because of the assessed undue burden of remaining in compliance after this date. FERC approved the retirement of these Standards in their entirety without replacement because they provide little or no reliability benefit, are administrative in nature or relate expressly to commercial or business practices or are redundant with other Reliability Standards. FERC Docket No. RM19 17 001.

Assessment Report 17 – Scope (2/3)

CIP standards in scope are:

Standard	Status	BC Hydro current recommendation
CIP-003-9	Revised	Assess as normal



Assessment Report 17 – Scope (3/3)

NERC Glossary of Terms in scope:

Continent-wide Term	Link to Project Page	FERC Approval Date	U.S Effective Date	BC Hydro current recommendation
Generator Cold Weather Critical Component	Project 2021-07	2023-02-16	2024-10-01	Abeyance*
Extreme Cold Weather Temperature	Project 2021-07	2023-02-16	2024-10-01	Abeyance*
Generator Cold Weather Reliability Event	Project 2021-07	2023-02-16	2024-10-01	Abeyance*

* Recommended for abeyance as these Terms are associated with EOP-012-1. EOP-012-1 is expected to be superseded by EOP-012-2 upon the same October 1, 2024, effective date in the U.S. pending FERC approval of EOP-012-2. This will render EOP-012-1 as never being effective, leaving a suitability issue for adoption in B.C. if EOP-012-1 is adopted under Assessment Report No. 17. Likely EOP-011-4 and EOP-012-2 will be in scope for Assessment Report 18, along with the associated Terms listed here.

Assessment Report 17

Feedback

Where to find more information?

New standards, glossary of terms and redlines can be found on the BC Hydro Reliability website: <https://www.bchydro.com/energy-in-bc/operations/transmission/transmission-system/reliability.html>

When?

All feedback is due by end of day on **February 29, 2024** (Thursday).
Feedback received after this time will not be considered.



How to Provide Feedback

Patricia Robertson

BC Hydro



Registered Entity Feedback

Comments are evaluated against the following criteria:

- **Adverse Reliability Impacts:** Less stringent requirements than currently adopted standards or practices otherwise mandated in utility tariffs or business practices approved or endorsed by the BCUC.
- **Suitability Assessment (Technical/Administrative):**
 - a) Issues with requiring NERC Approval/Participation in order to implement.
 - b) Issues with ongoing provision of information to NERC or WECC due to a lack of clarity on reporting instructions, references to undefined processes or reporting tools, etc.
 - c) References to standards/glossary terms that are not yet FERC/BCUC approved or otherwise under BCUC assessment.
 - d) Any other issues that would affect an entity's ability to implement the requirements of a standard/glossary term (i.e., Planning Authority/Planning Coordinator input required for which the role(s)/responsibilities are under consideration by the BCUC).



Registered Entity Feedback

Comments are evaluated against the following criteria (cont.):

- Only **Adverse Reliability Impact** or **Suitability Assessment** comments will be considered as part of BC Hydro's recommendations, as only they fall under the scope of the established Assessment Report process
- Examples of issues **NOT** falling under the criteria of **Adverse Reliability Impact** or **Suitability Assessment** comments include:
 - Issues with entity functional registrations
 - Requests to change standard language or glossary terms/definitions – the BCUC does not have the authority to change standards or glossary terms
- Other issues should be discussed with the BCUC separately



Registered Entity Feedback

MRS adoption recommendations are formed from your feedback

In the Assessment Report, BC Hydro will:

- Aggregate and summarize all provided costs
- Recommend implementation timelines based on entity feedback in combination with FERC approved recommended implementation times



Registered Entity Feedback

Your feedback is important in the evaluation process

- All feedback comments will be kept verbatim
- If your feedback seems unclear, BC Hydro will contact you and ask for revisions/clarification and resubmission
- BC Hydro will **NOT** make changes to entity feedback – feedback forms are taken verbatim and appended to the Assessment Report for BCUC’s reference



How to Provide Feedback

Feedback spreadsheet walkthrough:

- All feedback needs to be entered into the provided spreadsheet against individual requirements
- Spreadsheet found on the BC Hydro Reliability website: <https://www.bchydro.com/energy-in-bc/operations/transmission/transmission-system/reliability.html>

Assessment 15 - O&P Standards Feedback											
Disclaimer: This information has been prepared as input into BC Hydro's Assessment 15 report on Mandatory Reliability Standards and is based on information available to BC Hydro as of the date sent. It should not be relied upon for any other purpose.											
Entity Name and Function											
INFORMATIONAL COLUMNS											
Standard	FERC Approved New/Revised/Retired Standard/Requirement - <i>Link to NERC site</i>	RS AW - <i>Link to NERC site</i>	Standard Name and Description	Current BCUC Standard - <i>Search</i> https://www.bcuc.com/OurWork/Proceedings	FERC Approved Revision - <i>Read the documents found here:</i> https://www.bchydro.com/energy-in-bc/operations/transmission/transmission-system/reliability.html	FERC Approved Revision Mapping Document - <i>Link to mapping document</i>	Functional Applicability of FERC Approved Standards/Requirements	FERC Order No. or Letter - <i>Link to Federal Register</i>	Effective Date of FERC Rule Approving the Standard	FERC Approved Standard/Requirement Implementation Time - <i>Link to NERC Implementation Plan</i>	US Enforcement Date
BAL-002-WECC-3	BAL-002-WECC-3 B1	Not available	Contingency Reserve To specify the quantity and types of Contingency Reserve required to ensure reliability under normal and abnormal conditions.	BAL-002-WECC-2a Assessment 10 Order: R-39-17	BAL-002-WECC-3 Redline R1. No change	N/A	BA, RSG	Docket No. RM19-20-000 Approving Standard BAL-002-WECC-3	2021-06-28	Effective immediately on receipt of regulatory approval.	2021-06-28
BAL-002-WECC-3	BAL-002-WECC-3 B2	Not available	Contingency Reserve To specify the quantity and types of Contingency Reserve required to ensure reliability under normal and abnormal conditions.	BAL-002-WECC-2a Assessment 10 Order: R-39-17	BAL-002-WECC-3 Redline R2. Reserved (requirement retired)	N/A	BA, RSG	Docket No. RM19-20-000 Approving Standard BAL-002-WECC-3	2021-06-28	Effective immediately on receipt of regulatory approval.	2021-06-28



In Summary

Your feedback is important in the evaluation process:

- B.C. has a separate assessment process and timeline subsequent to the U.S. adoption of standards
- Every year BC Hydro, with feedback from Registered Entities, reviews each MRS assessing the suitability for adoption in B.C. and files a report with the BCUC
- **Deadline for feedback is end of the day February 29, 2024.** Feedback received after this date will **NOT** be considered
- The BCUC must adopt the MRS assessed in the report unless after a hearing it determines that the MRS is not in the public interest



Thank You!

If further information is required or there are any further questions, please contact:

BCUC – MRS@bcuc.com

BC Hydro – BCHydroReliabilityStandards@bchydro.com

Questions?



Sources of Information

- BCUC MRS website: <https://www.bcuc.com/WhatWeDo/MRS>
- BCUC website for Current and archived MRS orders: <https://www.bcuc.com/OurWork/Proceedings>
- NERC website: <https://www.nerc.com/pa/Stand/Pages/default.aspx>
- WECC website: www.wecc.org
- NERC/WECC hosted standards drafting/implementation and compliance webinars
- WECC Reliability & Security Outreach Meetings
- Western Interconnection Forum (WICF): <http://www.wicf.biz/>



