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January 25, 2012

Ms. Alanna Gillis  
Acting Commission Secretary  
British Columbia Utilities Commission  
Sixth Floor – 900 Howe Street  
Vancouver, BC V6Z 2N3

Dear Ms. Gillis:

**RE: British Columbia Utilities Commission (BCUC)  
British Columbia Hydro and Power Authority (BC Hydro)  
Open Access Transmission Tariff (OATT)  
Revised OATT Attachment K - Transmission Planning Process**

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BC Hydro is applying to the BCUC pursuant to sections 59 through 61 of the *Utilities Commission Act (UCA)* for approval of a revised Attachment K to its OATT attached as Appendix 1 to this application. Revisions to Attachment K are required to align the transmission planning process with the multiple integrated planning processes of BC Hydro. These revisions maintain the spirit and intent of the existing Attachment K approved by BCUC Order No. G-102-09.

The purpose of the proposed Attachment K is to document the transmission provider's transmission planning process to support open and non-discriminatory access to the BC Hydro transmission system. However, Attachment K is not intended to describe the broader planning processes and more comprehensive consultations undertaken generally by BC Hydro as an integrated utility. The proposed Attachment K conforms with the Federal Energy Regulatory Commission (**FERC**) *pro forma* OATT and is designed to satisfy the nine planning principles set out in FERC Order No. 890 and related orders on rehearing.<sup>1</sup> The enclosed Attachment K tariff pages in Appendix 1 are to replace the current Attachment K in its entirety.

Pursuant to BCUC Order No. G-225-11, the BCUC granted relief from BC Hydro's existing Attachment K until January 31, 2012. BC Hydro requests that the BCUC grant continued relief from BC Hydro's obligations under its existing Attachment K until such time that revised Attachment K tariff pages are approved and come into effect.

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<sup>1</sup> Preventing Undue Discrimination and Preference in Transmission Service, FERC Stats & Regs. 31,241 (February 16, 2007) (Order No. 890); order on rehearing, 121 FERC 61297 (January 16, 2008) (Order No. 890-A); order on rehearing, 123 FERC 61,299 (June 23, 2008) (Order 890-B); order on rehearing, 126 FERC 61,228 (March 19, 2009) (Order 890-C); order on rehearing, 129 FERC 61,126 (November 19, 2009) (Order 890-D). Due to their length, BC Hydro has not attached FERC Order No 890 and subsequent orders on rehearing. They are available online at: <http://www.ferc.gov/industries/electric/indus-act/oatt-reform.asp>.

This application is organized as follows:

1. Background;
2. Description of Revised Attachment K;
3. Revised Attachment K Meets FERC's Planning Principles;
4. Consultation;
5. Implementation;
6. Suggested Regulatory Process; and
7. Conclusion and Orders Sought.

In addition, the following appendices are attached for reference:

Appendix 1 – Proposed Attachment K;

Appendix 2 – Black-line Comparing Existing vs. Proposed Attachment K;

Appendix 3 – Table Summarizing Changes;

Appendix 4 – Draft Order for Approval of Attachment K;

Appendix 5 – Draft Order for Approval of Continued Relief;

Appendix 6 – Extracts from BCTC's 2008 Application to Amend the OATT; and

Appendix 7 – BCOAPO Comments, BC Hydro acknowledgement of BCOAPO comments, Table Responding to BCOAPO Comments, and Black-line Comparing Posted Draft vs. Proposed Attachment K.

## **1. Background**

BC Hydro maintains an OATT that is comparable with the FERC *pro forma* OATT to maintain consistency with neighbouring transmission providers in the U.S. This approach mitigates "seams" issues, or differences between BC Hydro's transmission tariff terms and conditions and those of its neighbours in the U.S. Moreover, maintaining comparability with FERC's *pro forma* OATT allows Powerex Corp., BC Hydro's marketing affiliate, to maintain its power marketing authority from FERC to sell electricity in the U.S.

On November 21, 2008, the British Columbia Transmission Corporation (**BCTC**) applied to incorporate amendments to the OATT (**2008 OATT Application**) consistent with FERC Order No. 890 and related orders. BCTC's 2008 OATT Application provides an overview of FERC's

Order No. 890 reform and the revisions to BCTC's OATT. The relevant sections, sections 2 and 3.2, of the 2008 OATT Application are attached as Appendix 6 for reference.

Included within the package of amendments in the 2008 OATT Application was a new Attachment K to the OATT, which incorporated a transmission planning process consistent with nine planning principles outlined in FERC Order No. 890. Further details on these planning principles are provided below in section 3 of this application. On September 10, 2009, the BCUC approved the proposed amendments, including Attachment K, in BCUC Order No. G-102-09.

Subsequently, the *Clean Energy Act*, S.B.C 2010, c. 16 (**CEA**) was passed, integrating BC Hydro and BCTC and requiring BC Hydro to complete an integrated resource plan. On September 16, 2010, BC Hydro submitted an application to the BCUC seeking approval to amend the existing OATT, related tariff supplements and rate schedules to reflect the integration of BC Hydro and BCTC. Included in the application was a request that BC Hydro be granted relief from compliance with the terms of Attachment K to BC Hydro's OATT until January 1, 2012, in order to allow BC Hydro to fully assess its transmission planning process and determine how it would proceed with compliance with the CEA in conjunction with the UCA and the OATT. In BCUC Order No. G-192-10, dated December 9, 2010, the BCUC approved BC Hydro's request for relief from its obligations under Attachment K of the OATT until January 1, 2012.

On December 16, 2011, BC Hydro submitted an application to the BCUC requesting continued relief from its obligations under Attachment K to allow BC Hydro to seek comments from interested parties on its revised Attachment K. In BCUC Order No. G-225-11, dated December 29, 2011, the BCUC approved BC Hydro's request for relief from its obligations under Attachment K of the OATT until January 31, 2012.

## **2. Description of Revised Attachment K**

The purpose of Attachment K is to document the transmission provider's transmission planning process to support open and non-discriminatory access to its transmission system. The existing Attachment K accomplished this by describing a transmission planning process for growth capital expenditures. As a discrete planning process to be undertaken by an entity only responsible for transmission, the existing Attachment K prescribed the steps of the planning process in detail. While suitable for BCTC at the time, the planning process is too prescriptive for the broader processes and multiple activities undertaken by BC Hydro as an integrated utility.

Currently, transmission planning activities undertaken by BC Hydro are summarized as follows:

1. Long-Term Planning: BC Hydro undertakes long-term planning through the Integrated Resource Plan (**IRP**) development process as required by section 3 of the CEA. Typically, BC Hydro develops transmission plans for the highest transmission voltages with a thirty-year planning horizon as part of the IRP process.

2. **Transmission Capital Planning:** BC Hydro undertakes an annual process to develop detailed transmission planning requirements for all transmission voltages with a 10-year planning horizon.
3. **Regional and Inter-Regional Planning:** BC Hydro coordinates on a regional basis with other parties that have an interest in transmission development in B.C. through the British Columbia Coordinated Planning Group, as well as on an inter-regional basis through the Western Electricity Coordinating Council.

The transmission planning process described in Attachment K needs to be flexible enough to apply to all of BC Hydro's processes or to new planning processes that may arise in order to avoid frequent revisions. The existing Attachment K does not provide this flexibility. To address this issue, the revised Attachment K outlines the key procedural steps that BC Hydro will incorporate into each of its transmission planning activities undertaken in a particular planning cycle. These steps are drafted so as to be compatible with all of BC Hydro's planning activities. However, to be clear, Attachment K does not preclude further public and First Nations consultation in relation to planning, as appropriate or required.

The four key procedural steps, as outlined in Attachment K, to be followed by BC Hydro in undertaking its long-term, capital or regional transmission planning activities are as follows:

1. Each planning activity will be initiated by notifying interested parties. Interested parties will then be provided with opportunities to provide planning information, including requests for economic planning studies.
2. Taking into account information from interested parties, BC Hydro will develop and post a draft scope of transmission plan studies. Interested parties will be provided an opportunity to review and provide input on the draft.
3. Taking into account additional information from interested parties, BC Hydro will update the scope documentation as necessary and post the final scope of transmission plan studies. BC Hydro will then conduct the studies, including any economic planning studies. Following completion of the studies, BC Hydro will post the study results and a preliminary set of projects on its website. Interested parties will be provided an opportunity for input on these projects.
4. After considering input from interested parties, BC Hydro will develop and post a draft transmission plan, which will include, amongst other things, projects to meet transmission needs, projects in progress and projects to meet the requirements of transmission and interconnection service requests.

Final transmission plans will be posted on BC Hydro's website.

Attachment K outlines a process only, and does not impose any obligations on BC Hydro to construct any particular project or provide transmission or interconnection service to any

customer. The terms and conditions of transmission and interconnection services are as set out in other provisions of the OATT.

**3. Revised Attachment K Meets FERC Planning Principles**

FERC Order No. 890 requires that transmission providers adopt, as an attachment to each transmission provider’s OATT, a coordinated, open, and transparent transmission planning process on both local and regional levels. FERC did not prescribe *pro forma* provisions of the planning process, but instead ordered that each transmission provider develop its own planning process in accordance with the following nine planning principles: Coordination, Openness, Transparency, Information Exchange, Comparability, Dispute Resolution, Regional Participation, Economic Planning Studies, and Cost Allocation for New Projects.

The transmission planning process described in the proposed revised Attachment K is consistent with FERC Order No. 890 planning principles. Table 1 below summarizes the requirements of FERC Order No. 890’s planning principles and illustrates how BC Hydro’s transmission planning process satisfies each of the principles by referencing applicable sections in the proposed Attachment K.

**Table 1 FERC Order No. 890 Concordance Table**

FERC Order No. 890 Requirements	BC Hydro’s Process <sup>2</sup>
<b>Coordination</b>	
<ul style="list-style-type: none"> <li>Transmission providers must provide customers and other stakeholders with the opportunity to participate fully in the planning process.</li> <li>The planning process must provide for the timely and meaningful input and participation of customers and other stakeholders regarding the development of transmission plans, allowing customers and other stakeholders to participate in the early stages of development.<sup>3</sup></li> </ul>	<ul style="list-style-type: none"> <li>BC Hydro will announce the commencement of a transmission planning activity and provide opportunity for Interested Parties to submit planning information as described in section 4.</li> <li>BC Hydro will provide opportunities for Interested Parties to participate and provide input to the transmission planning process as described in sections 3, 5, 6 and 7. As set out in section 3, this may include opportunities to provide written comments or to participate in transmission planning meetings or focus groups.</li> </ul>

<sup>2</sup> All section references are to BC Hydro’s proposed Attachment K (Appendix 1).

<sup>3</sup> FERC Order No. 890, paragraphs 445, 451 and 452 and FERC Order No. 890-A, paragraphs 182 and 188.

FERC Order No. 890 Requirements	BC Hydro's Process <sup>2</sup>
<b>Openness</b>	
<ul style="list-style-type: none"> <li>Transmission planning meetings must be open to all affected parties including, but not limited to, all transmission and interconnection customers, state commissions and other stakeholders.</li> <li>Confidential and security sensitive information must be managed through the use of confidentiality agreements or password-protected access.<sup>4</sup></li> </ul>	<ul style="list-style-type: none"> <li>The planning process will be open to all Interested Parties as described in section 3.2.</li> <li>Confidential and security sensitive information will be protected by BC Hydro in accordance with guidelines to be developed as described in section 8.</li> </ul>
<b>Transparency</b>	
<ul style="list-style-type: none"> <li>Transmission providers must disclose to all customers and other stakeholders the basic criteria, assumptions, and data that underlie their transmission system plans.</li> <li>The information should enable customers, other stakeholders, or an independent third party to replicate the results of planning studies and thereby reduce the incidence of after-the-fact disputes regarding whether planning has been conducted in an unduly discriminatory fashion.<sup>5</sup></li> </ul>	<ul style="list-style-type: none"> <li>BC Hydro will post its own and customer-provided planning information on its website, as described in section 3.5.</li> <li>BC Hydro will post the draft scope of transmission plan studies on its website and Interested Parties may comment on the draft scope of transmission plan studies as described in section 5.1.</li> <li>BC Hydro will post updates to the scope as described in section 5.2.</li> <li>BC Hydro will post the draft transmission plan on its website and Interested Parties may comment on the draft transmission plan as described in section 7.1.</li> <li>BC Hydro will post updates to the transmission plan as described in section 7.2.</li> </ul>

<sup>4</sup> FERC Order No. 890, paragraphs 455 and 460 and FERC Order No. 890-A, paragraphs 192 and 194.

<sup>5</sup> FERC Order No. 890, paragraphs 461, 471 and 472 and FERC Order No. 890-A, paragraphs 195 and 199.

FERC Order No. 890 Requirements	BC Hydro's Process <sup>2</sup>
<b>Information Exchange</b>	
<ul style="list-style-type: none"> <li>Transmission providers must develop guidelines and a schedule for the submittal of information in consultation with their Network and Point-to-Point (<b>PTP</b>) customers. PTP customers are required to submit any projections that they have of a need for service over the planning horizon. The information exchanged should focus on system planning, not on studies in response to interconnection or transmission service requests.<sup>6</sup></li> </ul>	<ul style="list-style-type: none"> <li>BC Hydro will develop guidelines and announce the initiation of planning activities and post these on its public website as described in section 4.</li> <li>Network, transmission and interconnection customers will submit planning information as described in sections 3 and 4.</li> <li>BC Hydro will post its own and customer-provided planning information on its website, as described in section 3.5.</li> </ul>
<b>Comparability</b>	
<ul style="list-style-type: none"> <li>Transmission providers must develop, after considering the data and comments supplied by customers and other stakeholders, a transmission system plan that meets the specific service requests of their transmission customers and otherwise treats similarly-situated customers (e.g., Network and retail native load) comparably in transmission system planning.<sup>7</sup></li> </ul>	<ul style="list-style-type: none"> <li>Requests for service under the Tariff will continue to be treated in accordance with the Tariff, as described in section 1.</li> <li>BC Hydro will receive planning information from all customers and Interested Parties as described in section 4.1.</li> <li>All Interested Parties will be provided the same opportunities to participate in the transmission planning process described in sections 3, 5, 6 and 7.</li> <li>Interested Parties may also provide non-wires solutions for consideration along with other transmission alternatives, as described in section 4.1(e)</li> </ul>
<b>Dispute Resolution</b>	
<ul style="list-style-type: none"> <li>Transmission providers must have a dispute resolution process to manage disputes that arise from the planning process.<sup>8</sup></li> </ul>	<ul style="list-style-type: none"> <li>As described in section 10, resolution of disputes will be facilitated through BC Hydro's point of contact or through the BCUC complaint procedure.</li> </ul>

<sup>6</sup> FERC Order No. 890, paragraphs 480 and 486-488 and FERC Order No. 890-A, paragraphs 203 and 206.

<sup>7</sup> FERC Order No. 890, paragraphs 489, 494 and 495 and FERC Order No. 890-A, paragraphs 208 and 213.

<sup>8</sup> FERC Order No. 890, paragraphs 496 and 501-503 and FERC Order No. 890-A, paragraphs 217 and 220.

FERC Order No. 890 Requirements	BC Hydro's Process <sup>2</sup>
<b>Regional Participation</b>	
<ul style="list-style-type: none"> <li>In order to satisfy the regional participation principle, transmission providers must coordinate with interconnected systems (1) to share system plans to ensure that they are simultaneously feasible and otherwise use consistent assumptions and data, and (2) to identify system enhancements that could relieve congestion or integrate new resources.<sup>9</sup></li> </ul>	<ul style="list-style-type: none"> <li>As described in section 9, BC Hydro will engage in regional planning through participation in the Western Electricity Coordinating Council and the British Columbia Coordinated Planning Group or through direct engagement with other transmission providers.</li> <li>Interested Parties may participate in regional planning and BC Hydro will provide information on opportunities for such participation as described in section 9.3.</li> </ul>
<b>Economic Planning Studies</b>	
<ul style="list-style-type: none"> <li>Transmission providers need to take into account both reliability and economic considerations in their planning processes. The purpose of this principle is to ensure that customers may request studies that evaluate potential upgrades and other investments that could reduce congestion or integrate new resources and loads on an aggregated or regional basis.</li> <li>Customers must be given the right to request a defined number of studies annually.</li> <li>Transmission providers are not obligated to provide service as a result of the request for economic planning studies or to fund economic projects.</li> <li>The Transmission provider must clearly describe the process by which economic planning studies can be requested and how they will be prioritized.<sup>10</sup></li> </ul>	<ul style="list-style-type: none"> <li>BC Hydro will undertake Economic Planning Studies as described in section 6.1.</li> <li>BC Hydro will post guidelines on how Interested Parties can make requests for Economic Planning Studies as described in section 4.</li> <li>BC Hydro will evaluate and manage requests for economic planning studies to the appropriate planning activities as described in section 5.1.</li> </ul>
<b>Cost Allocation for New Projects</b>	
<ul style="list-style-type: none"> <li>Transmission providers must develop cost allocation methodologies for projects that are not identified through transmission or interconnection service requests.<sup>11</sup></li> </ul>	<ul style="list-style-type: none"> <li>As discussed in section 11, cost allocation for projects will remain in accordance with the principles of BC Hydro's OATT.</li> </ul>

<sup>9</sup> FERC Order No. 890, paragraphs 504 and 523-527 and FERC Order No. 890-A, paragraphs 222 and 226.

<sup>10</sup> FERC Order No. 890, paragraphs 529 and 542-551 and Order No. 890-A, paragraphs 228 and 235-240.

<sup>11</sup> FERC Order No. 890, paragraphs 552 and 557-561 and Order No. 890-A, paragraphs 241 and 250-254.

#### **4. Consultation**

On December 15, 2011, BC Hydro posted a draft of the proposed Attachment K on its public transmission scheduling website, with notification provided to those individuals who are subscribed for such transmission scheduling bulletins, and requested comments by January 3, 2012.<sup>12</sup> Comments were received from the British Columbia Old Age Pensioners Organization et al. (**BCOAPO**). No other comments were received. BC Hydro believes it has addressed the concerns of BCOAPO, either by amending its proposed Attachment K or clarifying the intent of the proposed Attachment K. Attached as Appendix 7 are the comments of BCOAPO, a table showing BC Hydro's responses to those comments, and a blackline version of Attachment K showing the changes made to address comments.

#### **5. Implementation**

The implementation of Attachment K will require the development of OATT business practices. Following the approval of the revised Attachment K, BC Hydro will develop and consult on proposed business practices that support Attachment K in accordance with section 4 of the OATT.

To allow BC Hydro sufficient time to develop and consult on the business practices to support Attachment K, BC Hydro requests that the revised Attachment K become effective no earlier than four months after the date on which the new tariff sheets are approved.

#### **6. Suggested Regulatory Process**

BC Hydro recommends that a written regulatory process is appropriate for review of the proposed revisions to Attachment K of the OATT. Based on the consultation on the existing and revised Attachment K, and the past regulatory proceedings described in section 1 above, BC Hydro believes that the provisions of Attachment K are not controversial and that interest in Attachment K has been, and appears to be, limited.

#### **7. Conclusion and Orders Sought**

BC Hydro requests that its revised Attachment K attached as Appendix 1 to this application be approved in accordance with the draft order attached as Appendix 4. Similar to the existing Attachment K, the revised Attachment K is consistent with the transmission planning requirements of FERC Order No. 890 and, specifically, fulfills the nine transmission planning principles as outlined by FERC. Maintaining comparability with FERC's *pro forma* transmission tariff maintains consistency with neighbouring transmission providers in the U.S. and enables Powerex Corp., BC Hydro's marketing affiliate, to maintain its power marketing authority to sell electricity in the U.S.

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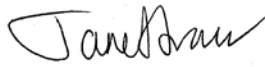
<sup>12</sup> Available at: [http://www.transmission.bchydro/transmission\\_scheduling/bulletins/2011](http://www.transmission.bchydro/transmission_scheduling/bulletins/2011).

January 25, 2012  
Ms. Alanna Gillis  
Acting Commission Secretary  
British Columbia Utilities Commission  
Open Access Transmission Tariff (OATT)  
Revised OATT Attachment K - Transmission Planning Process

In addition, BC Hydro also requests continued relief from the existing Attachment K until the revised Attachment K pages are approved and come into effect, as set out in the draft order attached as Appendix 5. BC Hydro respectfully requests that such relief be granted in advance of January 31, 2012.

For further information, please contact Sandra Jones at 604-623-4315 or by e-mail at [bchydroregulatorygroup@bchydro.com](mailto:bchydroregulatorygroup@bchydro.com).

Yours sincerely,



Janet Fraser  
Chief Regulatory Officer

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Enclosures (7)

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<p><b>TransAlta</b>                  Attention: Marcy Cochlan  <a href="mailto:marcy_cochlan@transalta.com">marcy_cochlan@transalta.com</a></p>	<p><b>TransCanada</b>                  Attention: Chris Best  <a href="mailto:chris_best@transcanada.com">chris_best@transcanada.com</a>                   Attention: Regulatory Department  <a href="mailto:tce_regulatory@transcanada.com">tce_regulatory@transcanada.com</a></p>	

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**Open Access Transmission Tariff (OATT)**

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**Appendix 1**

**Proposed Attachment K**

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**ATTACHMENT K****Transmission Planning Process****1. Purpose and Description of the Planning Process**

The purpose of this Attachment K is to support open and non-discriminatory access to the Transmission System. For greater certainty, Attachment K does not preclude further public and First Nations consultation in relation to planning, as appropriate or required.

This Attachment K describes a process to be followed for each of the Transmission Provider's three forms of transmission planning activities as set out below. Each transmission planning activity will include the generic planning elements described in this Attachment K as part of the broader planning requirements of the activity. Specifically, each planning activity will be initiated through notification to Interested Parties and will include the open and transparent development of the scope of transmission planning studies leading to the establishment of a set of Projects comprising the Transmission Plan. In its application, the planning process may vary depending on the needs and objectives of the specific transmission planning activity being undertaken. The Transmission Provider's planning activities may be mandated by provincial legislation or driven by corporate planning needs from year to year.

There are three forms of transmission planning activities that the Transmission Provider undertakes as required:

- (a) Long-term Planning: The first form of transmission planning occurs within the framework of the Transmission Provider's long-term planning. This activity provides a long-term plan relating to bulk Transmission System needs; i.e. typically those facilities at the highest voltage levels that are required to move energy over long distances. While focused at the bulk level, long-term planning considers a wide range of supply-side and demand-side options, resulting in an integrated system plan.

ACCEPTED: \_\_\_\_\_

ORDER NO. \_\_\_\_\_

- (b) **Transmission Capital Planning:** A second form of transmission planning is informed by the results of long-term planning and periodically assesses the Transmission System requirements over a shorter planning horizon. This transmission capital planning activity serves to identify the capital requirements necessary to fund Transmission System enhancements at all transmission voltage levels, as well as to meet the NERC transmission planning mandatory reliability standards as adopted in British Columbia by the BCUC.
- (c) **Regional Planning:** A third form of transmission planning includes consideration of other transmission owners that have an interest in transmission development undertaken within British Columbia. This is expected to take place through the framework of BCCPG and WECC. Within British Columbia, the BCCPG enables coordination, and where appropriate, integration of the transmission planning functions of its members. Outside of British Columbia, the BCCPG represents the interests of its members through participation in WECC planning groups, committees and subcommittees.

None of the three planning activities in Sections 1(a), (b), (c) guarantee Transmission Service. A Transmission Service request must be made separately by an Eligible Customer under the relevant provisions of the Tariff. This Attachment K does not place obligations on the Transmission Provider to construct upgrades or facilities identified in a study or in its Transmission Plan. This Attachment K supports, but does not replace the Transmission Provider's construction-related obligations in other portions of the Tariff. Point-to-Point Transmission Service, Network Integration Transmission Service and Interconnection Service requests are governed by and studied in accordance with other portions of the Tariff. Where possible, these study processes will be incorporated into the transmission planning activities described in this Attachment K.

ACCEPTED: \_\_\_\_\_

ORDER NO. \_\_\_\_\_

**2. Definitions**

**BCCPG** means the British Columbia Coordinated Planning Group or successor organization.

**Economic Planning Studies** means studies undertaken by the Transmission Provider with respect of economic upgrades such as congestion reduction or the integration of new resources.

**FERC** means the United States Federal Energy Regulatory Commission.

**Interested Party** means any person affected by the planning process described in this Attachment K, such as a transmission customer, interconnection customer, or neighbouring transmission provider.

**NERC** means the North American Electric Reliability Corporation.

**Planning Manual** means the documentation produced and updated from time to time by the Transmission Provider that describes the basic methodology, criteria and assumptions used by the Transmission Provider.

**Point of Contact** means the contact designated by the Transmission Provider to whom all information and inquiries related to the planning activities described in this Attachment K should be directed.

**Project** means a capital project or concept for a capital project to expand the capability of the Transmission System to meet potential requirements and opportunities.

**Tariff** means the Transmission Provider's Open Access Transmission Tariff.

**Transmission Plan** means the outline of one or more Projects that meet the needs identified in the study plan developed pursuant to Section 5 of this Attachment K.

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ACCEPTED: \_\_\_\_\_

ORDER NO. \_\_\_\_\_

**Transmission Planning Meeting** means a meeting to provide information and to solicit input from Interested Parties on the Transmission Provider's planning activities.

**WECC** means the Western Electricity Coordinating Council.

### **3. Information Exchange**

Throughout each transmission planning activity undertaken by the Transmission Provider, the Transmission Provider will ensure that there are opportunities for information exchange between the Transmission Provider and Interested Parties. The opportunities provided for information exchange in a particular planning activity will be dependent on the nature of the specific planning activity being undertaken and will be determined by the Transmission Provider. The requirements and timelines for information exchange opportunities will be posted to the Transmission Provider's public website.

#### **3.1 Point of Contact**

The Transmission Provider will designate a Point of Contact for each planning activity and will post the Point of Contact including contact details on the Transmission Provider's public website. The Point of Contact will maintain a comprehensive mailing list of Interested Parties. All information and inquiries related to the planning activities described in this Attachment K should be directed to the Point of Contact.

#### **3.2 Interested Party - Options for Providing Input**

The Transmission Provider may use one or more of the mechanisms in section 3.2.1, 3.2.2 and 3.2.3 for obtaining input from Interested Parties in a transmission planning activity.

##### **3.2.1 Written Comment Periods**

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The Transmission Provider may establish a comment period through which it will take into account the written comments of Interested Parties with respect to a particular phase of a planning activity. The requirements and timelines for providing written comments to the Point of Contact will be made available through the Transmission Provider's public website.

### **3.2.2 Transmission Planning Meetings**

The Transmission Provider may hold a Transmission Planning Meeting with Interested Parties with respect to a particular phase of a planning activity. The timing and agenda of any Transmission Planning Meeting will be made available through the Transmission Provider's public website.

### **3.2.3 Focus Groups**

The Transmission Provider will engage focus groups where appropriate. Where focus groups are engaged, the Transmission Provider will post their terms of reference and schedule on the Transmission Provider's public website.

### **3.3 Use of Feedback Received**

The Transmission provider will post input received from Interested Parties, or summaries of such input where appropriate, to its public website. The Transmission Provider will consider the input received from Interested Parties and may update the transmission planning documentation to reflect such input. Any such updates will be at the discretion of the Transmission Provider. The Transmission Provider will post the revised documents on its public website.

### **3.4 Guidelines for Submission of Planning Information**

The Transmission Provider will establish guidelines regarding the format, schedule and procedure for the submission of planning information to the Transmission Provider in accordance with Section 4 of this Attachment K. The guidelines will be posted on the

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Transmission Provider's public website and will address how and when customer planning information and requests for Economic Planning Studies are to be submitted and how Economic Planning Studies are to be evaluated.

### **3.5 Availability of Planning Information**

Subject to the need to protect confidential or security sensitive information, the Transmission Provider will post on an ongoing basis the following on its public website:

- (a) the Transmission Provider's Planning Manual;
- (b) the Transmission Provider's current Transmission Plan;
- (c) the status of network upgrades for Projects in progress;
- (d) information received from Interested Parties throughout the course of the planning process; and,
- (e) planning information developed in the course of the planning process, including: circulated draft and final study and Transmission Plans, minutes of meetings and customer comments.

Subject to the need to protect confidential information or security sensitive information, the Transmission Provider may also post other information the Transmission Provider considers relevant to the planning process, including information received from advisory groups, regional planning groups, and local and regional studies.

### **3.6 Inquiries**

At any time, Interested Parties may direct inquiries related to the transmission planning process to the Point of Contact identified on the Transmission Provider's public website. The Point of Contact will respond to such inquiries as deemed appropriate by the Transmission Provider.

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**4. Initiation of a Planning Activity**

The Transmission Provider will announce the initiation of a planning activity via electronic mail to Interested Parties and on its public website. The announcement will include:

- (a) a description of the planning activity being undertaken, including anticipated milestones and schedule;
- (b) instructions on how to access the Transmission Provider's planning information;
- (c) instructions on how to access the Transmission Provider's guidelines for providing planning information;
- (d) an outline of the anticipated opportunities that will be available to Interested Parties to provide input into the planning activity as contemplated in Section 3 of this Attachment K;
- (e) instructions on how to access the Transmission Provider's guidelines for making requests for Economic Planning Studies; and
- (f) the number of Economic Planning Studies that the Transmission Provider will undertake during the planning activity.

**4.1 Submission of Planning Information**

In accordance with the guidelines established for the submission of planning information in Section 3 of this Attachment K, the Transmission Provider will receive planning information from Eligible Customers and Interested Parties as follows:

- (a) Interested Parties may submit written requests for Economic Planning Studies.

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- (b) Network Customers shall provide updates to their long-term forecasts on Network Loads and Network Resources, Contingency Resource Plans and the other information contemplated by Section 31.6 and Attachment P of the Tariff.
- (c) Transmission Customers receiving Long-Term Firm Point-to-Point Transmission Service shall provide a 10-year projection of the need for and usage of Long-Term Firm Point-to-Point Transmission Service on the Transmission System including receipt and delivery points.
- (d) Interconnection Customers shall provide a 10-year forecast with respect to any planned additions or upgrades, including their status and expected In-Service Date, planned retirements and environmental restrictions.
- (e) Any Interested Party may also provide:
  - i. information related to non-wires solutions to offset or defer transmission investments, including targeted demand-side management and generation options; and
  - ii. any information on potential requirements or opportunities that the Interested Party believes should be considered in a particular planning activity.

If any Eligible Customer or Interested Party fails to provide data or otherwise participate as described in this Attachment K, then the Transmission Provider may plan the Transmission System based on the information available.

## **5. Communication of the Scope of Transmission Plan Studies**

### **5.1 Posting of Draft Scope of Transmission Plan Studies**

Once a planning activity has been initiated as outlined in Section 4 of this Attachment K, the Transmission Provider will notify Interested Parties via electronic mail and make the following information available through its public website:

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- (a) the expected start date and duration of the planning activity, and the tasks to be undertaken as part of the activity;
- (b) a high level review of the Transmission Provider's study methodology, data and Planning Manual;
- (c) a proposed list of studies that meet the Transmission Provider's needs and opportunities;
- (d) which, if any, requested Economic Planning Studies can be combined;
- (e) which Economic Planning Studies will be undertaken, and the appropriate planning activity for them to be undertaken;
- (f) a review of the Transmission Provider's coordination among the planning activities described in Section 1 of this Attachment K, including a description of those Economic Planning Studies that have been referred for consideration as part of a specific planning activity; and
- (g) an outline of the opportunities for Interested Parties to provide their input on the draft scope in accordance with Section 3 of this Attachment K.

## **5.2 Posting of Final Scope of Transmission Plan Studies**

The Transmission Provider will consider input provided by Interested Parties and may update the scope documentation relating to Transmission Plan Studies. Once completed, the Transmission Provider will notify Interested Parties via electronic mail and post the final scope document to its public website.

## **6 Completion of Studies**

Once the final scope document is completed, the Transmission Provider will complete the studies contemplated therein.

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**6.1 Economic Planning Studies**

- (a) The Transmission Provider will conduct the selected Economic Planning Studies within its planning scope.
- (b) The Transmission Provider may request proponents of selected Economic Planning Studies and other Interested Parties to supply information that is reasonably necessary for the Transmission Provider to conduct the selected Economic Planning Studies. Such information may include cost information for transmission and generation facilities and forecasts of demand. Any information so provided will be considered not to be confidential unless it is claimed as such in accordance with Section 8 of this Attachment K. The Transmission Provider will have no obligation to proceed with an Economic Planning Study if the Transmission Provider does not receive the information reasonably necessary to conduct the Economic Planning Study.

**6.2 Use of Customer Planning Information**

Subject to confidentiality and security restrictions, any information received from Interested Parties may be used by the Transmission Provider without restriction in its planning activities described in this Attachment K and in the Transmission Provider's other planning activities or studies, such as studies in response to requests for Transmission Service or interconnection. However, if the Transmission Provider reasonably determines that any information provided under this Attachment K is inappropriate or unreasonable for a particular purpose, the Transmission Provider will not use it for such purpose.

The good faith projections of anticipated Point-to-Point uses of the Transmission System or forecasted generation additions or upgrades provided by customers are additional data for consideration by the Transmission Provider in its planning activities. The Transmission Provider may consider such projections, for example, to support likely

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scenarios for new investments. The projections, however, will not be treated as a substitute for actual Point-To-Point reservations or interconnection requests.

### **6.3 Preliminary Set of Projects**

After the completion of the studies, the Transmission Provider will post the following on its public website:

- (a) study results; and
- (b) a preliminary set of Projects.

### **6.4 Notice of Preliminary Set of Projects**

The Transmission Provider will inform Interested Parties through electronic mail and its public website that a preliminary set of Projects has been developed and posted and will outline the opportunities for Interested Parties to provide input in accordance with Section 3 of this Attachment K.

## **7. Transmission Plan Development**

### **7.1 Draft Transmission Plan**

After considering input received from Interested Parties regarding the preliminary set of Projects, the Transmission Provider will develop and notify Interested Parties via electronic mail that the draft Transmission Plan has been posted on its public website.

The draft Transmission Plan will include the following:

- (a) Projects that have been selected to meet the Transmission Provider's needs and opportunities;
- (b) Projects that are in progress;

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- (c) Projects that meet the requirements of Transmission Service and Interconnection Service requests;
- (d) Projects that have been developed sufficiently for the Transmission Provider to seek approval from its Board of Directors; and
- (e) Projects for which no approval will be sought in the current planning cycle.

The Transmission Provider will outline what opportunities will be available to Interested Parties for providing input on the draft Transmission Plan in accordance with Section 3 of this Attachment K.

## **7.2 Final Transmission Plan**

The Transmission Provider will consider input received from Interested Parties and may update the Transmission Plan as appropriate. Once completed, the Transmission Provider will post the final Transmission Plan to its public website. This will be the final step of a transmission planning activity. The inclusion of a Project in its Transmission Plan does not mean that a decision has been made by the Transmission Provider to proceed with the project.

## **8. Confidentiality**

The Transmission Provider will develop guidelines with respect to how it will receive, use and disclose confidential and security sensitive information, including specifying how Interested Parties may submit information on a confidential basis and how a party seeking access to such information can request access to it. These guidelines will be posted on the Transmission Provider's public website.

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**9. Inter-Regional and Regional Planning**

The Transmission Provider will coordinate with interconnected systems through participation in sub-regional planning groups and through direct engagement with neighbouring systems, as appropriate.

**9.1 WECC Inter-Regional Planning**

As a member of WECC, the Transmission Provider will follow WECC's policies and procedures for inter-regional planning and will participate in WECC's planning activities as it deems appropriate. The Transmission Provider will post current links to WECC's procedures and guidelines on its public website as well as information detailing the Transmission Provider's participation in WECC's planning processes.

**9.2 BCCPG Regional Planning**

As a member of BCCPG, the Transmission Provider will follow BCCPG's policies and procedures for British Columbia regional planning and will participate in BCCPG's planning activities as it deems appropriate. The Transmission Provider will post current links to BCCPG's procedures and guidelines on its public website as well as information detailing the Transmission Provider's participation in BCCPG's planning processes.

**9.3 Participation in Inter-Regional and Regional Planning**

Interested Parties who are interested in any regional planning activities may contact the Transmission Provider's Point of Contact to obtain information with respect to opportunities for participation in these forums.

**10 Dispute Resolution Process**

The dispute resolution procedures described in Section 12 of the Tariff are not applicable to disputes arising from the transmission planning process described in this Attachment K. Interested Parties may bring to the attention of the Point of Contact any

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issue arising from the planning activities outlined in this Attachment K and the Transmission Provider will work with Interested Parties to attempt to resolve the issue. Interested Parties may also file a complaint with the BCUC with respect to any such issue.

#### **11. Cost Allocation**

The Transmission Provider will recover the costs of projects required for meeting service requests and system improvements in accordance with the provisions of the Tariff.

The Transmission Provider is not obligated to expand the Transmission System based on the results of Economic Planning Studies. Where the Transmission Provider decides to construct facilities based on the results of one or more Economic Planning Studies, it will do so in accordance with any transmission expansion, congestion or other similar policy developed by the Transmission Provider and in effect at that time, subject to BCUC approval. In these cases, the Transmission Provider will apply the cost allocation principles of the applicable policy under which the project is developed, subject to BCUC approval.

#### **12. No Participant Funding**

Interested Parties may participate in the activities associated with the transmission planning process described herein at their own cost.

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**Open Access Transmission Tariff (OATT)**

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**Appendix 2**

**Black-line Comparing Existing  
vs. Proposed Attachment K**

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**ATTACHMENT K**

**Transmission Planning Process**

1. ~~Description And Purpose Of The Planning Process~~ [Purpose and Description of the Planning Process](#)

~~This Attachment describes the Transmission Provider's biennial process for planning capital projects for the purpose of expanding the capability of the Transmission System to meet potential requirements and opportunities over a 10-year planning horizon. The Transmission Provider's Planning Process described in this Attachment begins with an Initiation Phase providing for the exchange of information between Stakeholders and the Transmission Provider. Over the course of the Planning Process, Stakeholders may make comments on draft plans, submit requests for Economic Planning Studies and participate in Consultation Meetings and Technical Review Groups. The Planning Process ends with the formation of a Transmission Plan, which is a collection of projects in various stages of development, from an initial study of the project to implementation, that are designed to meet the potential needs and requirements identified in the Planning Process.~~

~~After the completion of the Planning Process as described herein, the Transmission Provider in its sole discretion will select the projects in the Transmission Plan for inclusion in its Growth Capital Portfolio.~~

[The purpose of this Attachment K is to support open and non-discriminatory access to the Transmission System. For greater certainty, Attachment K does not preclude further public and First Nations consultation in relation to planning, as appropriate or required.](#)

[This Attachment K describes a process to be followed for each of the Transmission Provider's three forms of transmission planning activities as set out below. Each transmission planning activity will include the generic planning elements described in this Attachment K as part of the broader planning requirements of the activity. Specifically, each planning activity will be initiated through notification to Interested Parties and will](#)

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include the open and transparent development of the scope of transmission planning studies leading to the establishment of a set of Projects comprising the Transmission Plan. In its application, the planning process may vary depending on the needs and objectives of the specific transmission planning activity being undertaken. The Transmission Provider's planning activities may be mandated by provincial legislation or driven by corporate planning needs from year to year.

There are three forms of transmission planning activities that the Transmission Provider undertakes as required:

- (a) Long-term Planning: The first form of transmission planning occurs within the framework of the Transmission Provider's long-term planning. This activity provides a long-term plan relating to bulk Transmission System needs; i.e. typically those facilities at the highest voltage levels that are required to move energy over long distances. While focused at the bulk level, long-term planning considers a wide range of supply-side and demand-side options, resulting in an integrated system plan.
- (b) Transmission Capital Planning: A second form of transmission planning is informed by the results of long-term planning and periodically assesses the Transmission System requirements over a shorter planning horizon. This transmission capital planning activity serves to identify the capital requirements necessary to fund Transmission System enhancements at all transmission voltage levels, as well as to meet the NERC transmission planning mandatory reliability standards as adopted in British Columbia by the BCUC.
- (c) Regional Planning: A third form of transmission planning includes consideration of other transmission owners that have an interest in transmission development undertaken within British Columbia. This is expected to take place through the framework of BCCPG and WECC. Within British Columbia, the BCCPG enables coordination, and where appropriate, integration of the transmission planning functions of its members. Outside of British Columbia, the BCCPG represents the

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interests of its members through participation in WECC planning groups, committees and subcommittees.

None of the three planning activities in Sections 1(a), (b), (c) guarantee Transmission Service. A Transmission Service request must be made separately by an Eligible Customer under the relevant provisions of the Tariff. This Attachment K does not place obligations on the Transmission Provider to construct upgrades or facilities identified in a study or in its Transmission Plan. This Attachment K supports, but does not replace the Transmission Provider's construction-related obligations in other portions of the Tariff. Point-to-Point Transmission Service, Network Integration Transmission Service and Interconnection Service requests are governed by and studied in accordance with other portions of the Tariff. Where possible, these study processes will be incorporated into the ~~Planning Process~~ transmission planning activities described in this Attachment K.

**2. Definitions**

~~Consultation Meeting means a meeting to provide information and to solicit input from Stakeholders on the Transmission Provider's planning of the Transmission System. Consultation Meetings are open to all Stakeholders. The Transmission Provider will announce Consultation Meetings via e-mail to Stakeholders and will post the announcement on the Transmission Provider's public website.~~

~~Commission~~ BCCPG means the British Columbia ~~Utilities Commission~~ Coordinated Planning Group or successor organization.

~~Economic Planning Studies means studies that evaluate potential upgrades or other investments that could reduce congestion or integrate new resources and loads on an aggregated or regional basis. Stakeholders may request Economic Planning Studies in the Initiation Phase of the Planning Process. The Transmission Provider may limit the number of Economic Planning Studies it undertakes in each planning cycle, depending on available resources. Economic Planning Study Requests that are not performed may be carried forward to the next planning cycle for consideration. The conducting of an~~

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~~Economic Planning Study in no way imposes any obligation on the Transmission Provider to fund, assign cost responsibility, or otherwise determine whether any economic project should be implemented.~~ undertaken by the Transmission Provider with respect of economic upgrades such as congestion reduction or the integration of new resources.

~~First Nations Engagement Process means a process to consider the specific interests and needs of affected First Nations.~~

~~Initiation Phase means the stage of the Planning Process described in Section 3.~~

FERC means the United States Federal Energy Regulatory Commission.

Interested Party means any person affected by the planning process described in this Attachment K, such as a transmission customer, interconnection customer, or neighbouring transmission provider.

NERC means the North American Electric Reliability Corporation.

**Planning Manual** means the ~~document~~documentation produced and updated from time to time by the Transmission Provider that describes the basic methodology, criteria and assumptions used by the Transmission Provider ~~in the Planning Process.~~ **Planning**

~~Process means the process of planning Projects described in this Attachment for the purpose of expanding the capability of the Transmission System in order to meet potential requirements and opportunities. The Planning Process includes the Initiation Phase, Study Plan Development Phase, Study Phase, and Transmission Plan Development Phase.~~

**Point of Contact** means the contact ~~at the Transmission Provider~~ designated by the Transmission Provider to whom all information and inquiries related to the ~~Planning Process~~planning activities described in this Attachment K should be directed. ~~Point of Contact information shall be posted on the Transmission Provider's public website.~~

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**Project** means a capital project or concept for a capital project to expand the capability of the Transmission System to meet potential requirements and opportunities.

~~Stakeholder means any person affected by the Planning Process, such as a transmission customer, interconnection customer, or neighbouring transmission provider as the case may be.~~

~~Study Phase~~**Tariff** means ~~the phase of~~ the Transmission Provider's ~~Planning Process~~ described in ~~Section 5.~~Open Access Transmission Tariff.

~~Study Plan Development Phase~~ means ~~the stage of the Planning Process~~ described in ~~Section 4.~~

~~Technical Review Group~~ means ~~a group of Stakeholders formed to provide the Transmission Provider with input on the assessment of planning alternatives that meet in accordance with the Terms of Reference for Technical Review Groups found in Appendix 1 to this Attachment.~~

**Transmission Plan** means ~~a collection~~the outline of one or more Projects that ~~meets~~meet the needs identified in the study plan developed pursuant to Section ~~4.~~5 of this Attachment K.

~~Transmission Plan Development Phase~~ means ~~the phase of~~Planning Meeting means a meeting to provide information and to solicit input from Interested Parties on the Transmission Provider's ~~Planning Process described in Section 6.~~planning activities.

**WECC** means the Western Electricity Coordinating Council.

3. ~~Initiation Phase~~Information Exchange

Throughout each transmission planning activity undertaken by the Transmission Provider, the Transmission Provider will ensure that there are opportunities for information exchange between the Transmission Provider and Interested Parties. The opportunities

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provided for information exchange in a particular planning activity will be dependent on the nature of the specific planning activity being undertaken and will be determined by the Transmission Provider. The requirements and timelines for information exchange opportunities will be posted to the Transmission Provider's public website.

**3.1 ~~Initiation of the Planning Process~~Point of Contact**

The Transmission Provider will ~~announce the initiation of the Planning Process via electronic mail to Stakeholders and on its public website. The announcement will include a description of the planning process, including milestones and an anticipated schedule, instructions on how to access~~designate a Point of Contact for each planning activity and will post the Point of Contact including contact details on the Transmission Provider's ~~planning information and instructions for providing planning information and requests for Economic Planning Studies to the Transmission Provider. The announcement will also indicate the number of Economic Planning Studies that may be performed within the Planning Process.~~public website. The Point of Contact will maintain a comprehensive mailing list of Interested Parties. All information and inquiries related to the planning activities described in this Attachment K should be directed to the Point of Contact.

**3.2 Stakeholder Mailing List**

**Interested Party - Options for Providing Input**

The Transmission Provider ~~will maintain a Stakeholder mailing list including customers, neighbouring transmission providers, the Commission and affected parties that have expressed interest in the Transmission Provider's consultation activities. Stakeholders may request to be added to the list through the Transmission Provider's Point of Contact.~~may use one or more of the mechanisms in section 3.2.1, 3.2.2 and 3.2.3 for obtaining input from Interested Parties in a transmission planning activity.

**3.2.1 Written Comment Periods**

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The Transmission Provider may establish a comment period through which it will take into account the written comments of Interested Parties with respect to a particular phase of a planning activity. The requirements and timelines for providing written comments to the Point of Contact will be made available through the Transmission Provider's public website.

**3.2.2 Transmission Planning Meetings**

The Transmission Provider may hold a Transmission Planning Meeting with Interested Parties with respect to a particular phase of a planning activity. The timing and agenda of any Transmission Planning Meeting will be made available through the Transmission Provider's public website.

**3.2.3 Focus Groups**

The Transmission Provider will engage focus groups where appropriate. Where focus groups are engaged, the Transmission Provider will post their terms of reference and schedule on the Transmission Provider's public website.

**3.3 ~~Submission of Customer Planning Information~~Use of Feedback Received**

The Transmission provider will post input received from Interested Parties, or summaries of such input where appropriate, to its public website. The Transmission Provider will consider the input received from Interested Parties and may update the transmission planning documentation to reflect such input. Any such updates will be at the discretion of the Transmission Provider. The Transmission Provider will post the revised documents on its public website.

**3.4 Guidelines for Submission of Planning Information**

The Transmission Provider will establish ~~a business practice in consultation with customers~~guidelines regarding the format, schedule and procedure for the submission of planning information to the Transmission Provider. ~~The business practice in accordance~~

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with Section 4 of this Attachment K. The guidelines will be posted on the Transmission Provider's public website and will address how and when ~~the following will occur~~ customer planning information and requests for Economic Planning Studies are to be submitted and how Economic Planning Studies are to be evaluated.

**3.5 Availability of Planning Information**

Subject to the need to protect confidential or security sensitive information, the Transmission Provider will post on an ongoing basis the following on its public website:

- (a) the Transmission Provider's Planning Manual;
- (b) the Transmission Provider's current Transmission Plan;
- ~~(a) Stakeholders may submit written requests for Economic Planning Studies.~~ (c) the status of network upgrades for Projects in progress;
- (d) information received from Interested Parties throughout the course of the planning process; and,
- (e) planning information developed in the course of the planning process, including: circulated draft and final study and Transmission Plans, minutes of meetings and customer comments.

Subject to the need to protect confidential information or security sensitive information, the Transmission Provider may also post other information the Transmission Provider considers relevant to the planning process, including information received from advisory groups, regional planning groups, and local and regional studies.

**3.6 Inquiries**

At any time, Interested Parties may direct inquiries related to the transmission planning process to the Point of Contact identified on the Transmission Provider's public website.

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The Point of Contact will respond to such inquiries as deemed appropriate by the Transmission Provider.

**4. Initiation of a Planning Activity**

The Transmission Provider will announce the initiation of a planning activity via electronic mail to Interested Parties and on its public website. The announcement will include:

- (a) a description of the planning activity being undertaken, including anticipated milestones and schedule;
- (b) instructions on how to access the Transmission Provider's planning information;
- (c) instructions on how to access the Transmission Provider's guidelines for providing planning information;
- (d) an outline of the anticipated opportunities that will be available to Interested Parties to provide input into the planning activity as contemplated in Section 3 of this Attachment K;
- (e) instructions on how to access the Transmission Provider's guidelines for making requests for Economic Planning Studies; and
- (f) the number of Economic Planning Studies that the Transmission Provider will undertake during the planning activity.

**4.1 Submission of Planning Information**

In accordance with the guidelines established for the submission of planning information in Section 3 of this Attachment K, the Transmission Provider will receive planning information from Eligible Customers and Interested Parties as follows:

- (a) Interested Parties may submit written requests for Economic Planning Studies.

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- (b) Network Customers shall provide updates to their ~~10-year~~long-term forecasts on Network Loads and Network Resources, Contingency Resource Plans and the other information contemplated by Section 31.6 and Attachment P of the Tariff.
- (c) Transmission Customers receiving Long-~~Term Firm Point-to-Point~~ Transmission ~~service~~Service shall provide a 10-~~year~~ projection of the need for and usage of Long-~~Term Firm Point-to-Point~~ Transmission ~~service~~Service on the Transmission System including receipt and delivery points.
- (d) Interconnection Customers shall provide a 10-~~year~~ forecast with respect to any planned additions or upgrades, including their status and expected ~~in-service date~~In-Service Date, planned retirements and environmental restrictions.
- (e) Any ~~Stakeholder~~Interested Party may also provide:
  - i. information related to non-~~wires~~ solutions to offset or defer transmission investments, including targeted demand-~~side~~ management and ~~energy procurement~~generation options; and
  - ii. any information on potential requirements or opportunities that the ~~Stakeholder~~Interested Party believes should be considered in ~~the Planning Process~~a particular planning activity.

If any Eligible Customer or Interested Party fails to provide data or otherwise participate as described in this Attachment K, then the Transmission Provider may plan the Transmission System based on the information available.

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**5. Communication of the Scope of Transmission Plan Studies**

**5.1 Posting of Draft Scope of Transmission Plan Studies**

Once a planning activity has been initiated as outlined in Section 4 of this Attachment K, the Transmission Provider will notify Interested Parties via electronic mail and make the following information available through its public website:

- (a) the expected start date and duration of the planning activity, and the tasks to be undertaken as part of the activity;
- (b) a high level review of the Transmission Provider's study methodology, data and Planning Manual;
- (c) a proposed list of studies that meet the Transmission Provider's needs and opportunities;
- (d) which, if any, requested Economic Planning Studies can be combined;
- (e) which Economic Planning Studies will be undertaken, and the appropriate planning activity for them to be undertaken;
- (f) a review of the Transmission Provider's coordination among the planning activities described in Section 1 of this Attachment K, including a description of those Economic Planning Studies that have been referred for consideration as part of a specific planning activity; and
- (g) an outline of the opportunities for Interested Parties to provide their input on the draft scope in accordance with Section 3 of this Attachment K.

**5.2 Posting of Final Scope of Transmission Plan Studies**

The Transmission Provider will consider input provided by Interested Parties and may update the scope documentation relating to Transmission Plan Studies. Once completed,

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the Transmission Provider will notify Interested Parties via electronic mail and post the final scope document to its public website.

**6 Completion of Studies**

Once the final scope document is completed, the Transmission Provider will complete the studies contemplated therein.

**6.1 Economic Planning Studies**

(a) The Transmission Provider will conduct the selected Economic Planning Studies within its planning scope.

(b) The Transmission Provider may request proponents of selected Economic Planning Studies and other Interested Parties to supply information that is reasonably necessary for the Transmission Provider to conduct the selected Economic Planning Studies. Such information may include cost information for transmission and generation facilities and forecasts of demand. Any information so provided will be considered not to be confidential unless it is claimed as such in accordance with Section 8 of this Attachment K. The Transmission Provider will have no obligation to proceed with an Economic Planning Study if the Transmission Provider does not receive the information reasonably necessary to conduct the Economic Planning Study.

**3.46.2 Use of Customer Planning Information**

Subject to confidentiality and security restrictions, any information received from Interested Parties may be used by the Transmission Provider without restriction in its planning activities ~~under~~described in this Attachment K and in the Transmission Provider's other planning activities or studies, such as studies in response to requests for ~~transmission service~~Transmission Service or interconnection. However, if the Transmission Provider reasonably determines that any information provided under this

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Attachment K is inappropriate or unreasonable for a particular purpose, the Transmission Provider ~~may~~will not use it for such purpose.

The good faith projections of anticipated ~~point-Point-to-point-Point~~ uses of the ~~transmission system~~Transmission System or forecasted generation additions or upgrades provided by customers are additional data for consideration by the Transmission Provider in its planning activities. The Transmission Provider may consider such projections, for example, to support likely scenarios for new investments. The projections, however, will not be treated as a substitute for actual ~~point-to-point~~Point-To-Point reservations or interconnection requests.

**~~3.5~~ — Confidentiality**

~~If a Stakeholder wishes to submit confidential information, the Stakeholder may provide the information in accordance with section 9, provided that the Transmission Provider may use the information for planning purposes and present the information to the public on an aggregated basis or by any other method which the Transmission Provider reasonably believes will not compromise the confidentiality requirements of the Stakeholder.~~

**~~3.6~~ — Availability of Planning Information**

~~Subject to the need to protect confidential information or security sensitive information, the Transmission Provider will post on an ongoing basis the following on its Planning Web Page:~~

- ~~(a) the Transmission Provider's Planning Manual;~~
- ~~(b) the data used by the Transmission Provider in its planning and study work, including base case data;~~
- ~~(c) potential requirements and opportunities;~~

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~~(c) the Transmission Provider's latest Capital Plan, including current reports regarding the state of the Transmission System;~~

~~(d) the status of Network Upgrades for Projects in progress;~~

~~(e) Transmission Service and Interconnection Service requests pursuant to the Tariff and any studies and agreements related to such requests;~~

~~(f) information on regional planning activities, as described in Section 11;~~

~~(g) information received from customers throughout the course of the Planning Process; and,~~

~~(h) planning information developed in the course of the Planning Process, including draft and final study and transmission plans, minutes of meetings and customer comments.~~

~~Subject to the need to protect confidential information or security sensitive information, the Transmission Provider will also post the following information as it becomes available:~~

~~(a) information regarding existing transmission constraints;~~

~~(b) generation redispatch options that can relieve transmission constraints in the Transmission Provider's Balancing Authority Area; and,~~

~~(c) other information the Transmission Provider considers relevant to the Planning Process, including information received from policy advisory groups, regional stakeholder meetings, regional planning groups, the First Nation's Engagement Process, and local and regional studies.~~

~~Planning information that is confidential or security sensitive will be described on the Transmission Provider's public website and made available to participating Stakeholders in accordance with Section 9.~~

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~~4 — Study Plan Development Phase~~

~~4.1 — Draft Study Plan~~

~~Based on the planning information submitted to the Transmission Provider or made available by the Transmission Provider in accordance with Section 3, the Transmission Provider will prepare and post on the Planning Web Page a draft study plan. The Draft Study Plan will include:~~

- ~~(a) potential requirements and opportunities;~~
- ~~(b) study data and planning assumptions;~~
- ~~(c) a list of approved projects in progress and their status;~~
- ~~(d) a list of proposed studies for meeting the potential requirements and opportunities, including list of studies required for meeting interconnection and transmission service requests, including a description of the scope and deliverables for each study;~~
- ~~(e) a review of the possible opportunities for combining the studies described in 4.1(d);~~
- ~~(f) a review of potential non-wires solutions to the potential requirements and opportunities; and,~~
- ~~(g) if there are more Economic Planning Study requests than the Transmission Provider is able to undertake, suggested criteria for selecting Economic Planning Studies to be performed, such as whether the requested Economic Planning Studies: (a) address significant and recurring congestion; (b) integrate new generation resources or load or both on an aggregated or regional basis; or (c) reduce the overall cost of transmission.~~

~~4.2 — Consultation Meeting~~

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~~The Transmission Provider will schedule a Consultation Meeting after the posting of the draft study plan. In the Consultation Meeting, the Transmission Provider will~~

~~(a) provide a high level review of the Transmission Provider's study methodology, data and planning assumptions;~~

~~(b) review the proposed list of studies;~~

~~(c) discuss and determine which, if any, requested Economic Planning Studies can be combined;~~

~~(d) if necessary, determine with Stakeholders which Economic Planning Studies will be undertaken, including determining selection criteria, the weight to be given to the criteria and the ranking of studies according the criteria;~~

~~(e) review the Transmission Provider's coordination with WECC and any bilateral or multilateral initiatives in which the Transmission Provider is participating with neighbouring transmission providers, utilities or sub-regional planning groups, including any opportunities for Stakeholders to be involved in such activities;~~

~~(f) establish Technical Review Groups for specific projects based on stakeholder interest and schedule initial meetings to review the Terms of Reference (see Appendix A) and to develop a meeting schedule; and,~~

~~(g) establish a comment period for Stakeholders to provide written comments.~~

~~**4.3 Posting of Minutes and Materials**~~

~~As soon as practicable, the Transmission Provider will post on the its public website minutes of the Consultation Meeting along with any materials distributed at the Consultation Meeting, subject to the need to protect confidential or security-sensitive information.~~

~~**4.4 Written Comments**~~

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~~Stakeholders may provide written comments on the draft study plan to the Point of Contact within the comment period. Stakeholder comments on the draft study plan will be posted on the Planning Web Page.~~

**4.5 — Final Study Plan**

~~Taking into account the written comments of Stakeholders, the Transmission Provider will develop and post on the its public website a final study plan. The final study plan will include:~~

- ~~(a) a written description of potential requirements and opportunities;~~
- ~~(b) study data and planning assumptions;~~
- ~~(c) a list of studies designed to meet the potential requirements and opportunities, including a description of the scope and deliverables for each study;~~
- ~~(d) a list of the Economic Planning Studies selected to be performed by the Transmission Provider;~~
- ~~(d) a schedule for the completion of each identified task;~~
- ~~(e) a schedule of Technical Review Group meetings;~~
- ~~(f) a list of studies that involve multiple Balancing Authority Areas; and,~~
- ~~(g) for studies that involve multiple Balancing Authority Areas, a description of the Transmission Provider's coordination with the relevant regional planning groups and periodic progress updates to affected Transmission Customers.~~

**4.6 — Amendments to the Study Plan**

~~During the Study Plan Development Phase or Study Phase, the Transmission Provider may propose amendments to the study plan by notifying Stakeholders and posting on the~~

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~~Transmission Provider's public website a notice of the proposed amendment along with an explanation of the reason for the amendment and specify a period for Stakeholders' comments. Stakeholders may provide written comments on the draft study plan to the Point of Contact. The Transmission Provider will take into account written comments before formally amending the study plan. The amended study plan will be posted on the Transmission Provider's public website along with the written comments.~~

**5. ~~Study Phase~~**

**5.1 ~~Performance of Studies~~**

~~(a) Following the posting of the final study plan, the Transmission Provider will perform the studies identified in the study plan in order to develop a preliminary set of Projects that will meet the potential requirements or opportunities identified.~~

~~(b) Following the posting of the final study plan, the Transmission Provider conduct the selected Economic Planning Studies, except for those of regional scope.~~

~~(c) In accordance with WECC's Transmission Planning Protocol, the Transmission Provider will submit Economic Planning Studies to WECC during its study request window. Economic Planning Studies of regional scope will be prioritized and completed as part of a Western Interconnection synchronized study cycle in accordance with the Transmission Planning Protocol, which is open to interested parties. Economic Planning Studies of regional scope which are not given high priority in the process will be deferred, although the requesting party may request that the study be completed at its own cost. The Transmission Provider will conduct and participate in regional studies in accordance with the Transmission Expansion Protocol. Information on the Transmission Planning Protocol will be provided to Stakeholders in accordance with Section 11.~~

~~(d) The Transmission Provider may request proponents of selected Economic Planning Studies and other Stakeholders to supply information within their possession or~~

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~~control necessary for the Transmission Provider to the conduct the selected Economic Planning Studies. Such information may include cost information for transmission and generation facilities. The information provided will be considered not to be confidential unless it is claimed as such. Confidential information may be provided under protection of a confidentiality agreement in accordance with Section 9 of this Attachment. The Transmission Provider will have no obligation to proceed with an Economic Planning Study if the Transmission Provider does not receive the information reasonably necessary to conduct the Economic Planning Study.~~

~~(e) In conducting studies, the Transmission Provider will consider customer demand and generation based non-wires solutions on a comparable basis to transmission alternatives. the Transmission Provider will develop planning criteria, which will be included in the Transmission Provider's Planning Manual, describing how transmission and non-wires solutions will be considered on a comparable basis in the study process.~~

~~5.2~~ **Technical Review Groups**

~~The Transmission Provider will engage the Technical Review Groups formed in the Study Plan Development Phase in accordance with their Terms of Reference and schedule.~~

~~5.3~~ **6.3 Preliminary Set of Projects**

After the completion of the studies ~~pursuant to Subsection 5.1,~~ the Transmission Provider will post the following on ~~the~~ its public website:

- (a) study results; and,
- (b) a preliminary set of Projects.

~~5.4~~ **Consultation Meeting**

6.4 Notice of Preliminary Set of Projects

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The Transmission Provider will ~~schedule a Consultation Meeting after the~~inform Interested Parties through electronic mail and its public website that a preliminary set of Projects ~~is posted. At the Consultation Meeting the Transmission Provider will:~~has been developed and posted and will outline the opportunities for Interested Parties to provide input in accordance with Section 3 of this Attachment K.

- ~~(a) review the preliminary set of Projects for inclusion in the Transmission Plan;~~
- ~~(b) review the results of studies that support the development of the preliminary set of Projects;~~
- ~~(c) review the results of Economic Planning Studies; and,~~
- ~~(d) establish a comment period for Stakeholders to provide written comments.~~

**~~5.5~~ Posting of Minutes and Materials**

~~As soon as practicable, the Transmission Provider will post on the its public website minutes of the Consultation Meeting along with any materials distributed at the Consultation Meeting, subject to the need to protect confidentiality or security sensitive information.~~

**~~5.6~~ Written Comments**

~~Stakeholders may submit written comments within the comment period to the Point of Contact. The Transmission Provider will post on the its public website comments received from Stakeholders.~~

**~~6.7~~ Transmission Plan Development Phase**

**~~6.7.1~~ Draft Transmission Plan**

~~Taking into account the written comments of Stakeholders~~After considering input received from Interested Parties regarding the preliminary set of Projects, the Transmission

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Provider will develop and ~~post on the its public website, a~~ notify Interested Parties via electronic mail that the draft Transmission Plan has been posted on its public website. The draft Transmission Plan ~~which describes the Transmission Provider's growth capital portfolio with a 10-year planning horizon~~ will include the following:

- (a) Projects that ~~meet the need identified in the study plan~~ have been selected to meet the Transmission Provider's needs and opportunities;
- (b) Projects that are in progress;
- (c) Projects that meet the requirements of ~~transmission and interconnection service~~ Transmission Service and Interconnection Service requests;
- (d) Projects that have been developed sufficiently for the Transmission Provider to seek approval from its Board of Directors; and,
- (e) Projects for which no approval will be sought in the current planning cycle.

The Transmission Provider will ~~also specify a comment period~~.

**6.2** ~~Written Comments~~ Stakeholders may submit written comments outline what opportunities will be available to Interested Parties for providing input on the draft Transmission Plan ~~to the Point of Contact within the comment period~~ in accordance with Section 3 of this Attachment K.

**7.2 Final Transmission Plan**

The Transmission Provider will consider input received from Interested Parties and may update the Transmission Plan as appropriate. Once completed, the Transmission Provider will post ~~comments received from Stakeholders on~~ the final Transmission Plan to its public website. This will be the final step of a transmission planning activity. The inclusion of a Project in its Transmission Plan does not mean that a decision has been made by the Transmission Provider's ~~public website~~ to proceed with the project.

**6.3** ~~Final Transmission Plan~~

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**8. Confidentiality**

~~Taking the comments from Stakeholders into consideration as necessary, the~~The  
Transmission Provider will develop ~~a final Transmission Plan~~guidelines with respect to  
how it will receive, use and disclose confidential and security sensitive information,  
including specifying how Interested Parties may submit information on a confidential basis  
and how a party seeking access to such information can request access to it. These  
guidelines will be posted on the Transmission Provider's public website.

**~~7. Inquiries~~**

~~At any time, Stakeholders may direct inquiries related to the Planning Process to the Point~~  
~~of Contact, who will be identified on the Transmission Provider's public website.~~

**~~8. Dispute Resolution Process~~**

~~Stakeholders are encouraged to bring to the attention of the Point of Contact any issues~~  
~~that they may have arising out of the Planning Process. Stakeholders may also file a~~  
~~complaint with the Commission with respect to any such issue.~~

**~~9. Confidentiality~~**

~~In the event that a Stakeholder or the Transmission Provider claims that planning-related~~  
~~information is confidential, any party seeking access to such information must agree to~~  
~~adhere to the terms of a confidentiality agreement. The form of confidentiality agreement~~  
~~will be initially developed by the Transmission Provider and will be posted on its Planning~~  
~~Website. Stakeholders will have an opportunity to submit comments on the form of~~  
~~confidentiality agreement. Confidential information shall be disclosed only to those~~  
~~participants in the planning process that require such information and that execute the~~  
~~confidentiality agreement. The Transmission Provider will develop procedures for the~~  
~~submission and requesting of confidential information and make such procedures~~  
~~available for comment on its public website.~~

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~~10. Standards of Conduct~~

~~The Transmission Provider's conduct under this Attachment is subject to the Transmission Provider's Standards of Conduct.~~

~~11.9. [Inter-Regional and](#) Regional Planning~~

The Transmission Provider will coordinate with interconnected systems through ~~its~~ participation in ~~WECC~~ [sub-regional planning groups](#) and through direct engagement ~~of~~ [with](#) neighbouring systems. ~~As a system in the corner of the WECC interconnected system, the Transmission Provider has not found it necessary to join any subregional planning groups, although the Transmission Provider will coordinate with such subregional planning groups through WECC and as otherwise may be necessary. [as appropriate](#).~~

~~11.9.1 WECC [Inter-Regional Planning](#)~~

As a member of WECC, the Transmission Provider will follow ~~and participate in~~ WECC's policies and procedures for ~~Regional Planning Project Review, Project Rating Review, and Progress Reports. The Transmission Provider will also participate in the Transmission Planning Protocol of WECC's Transmission Expansion Planning Policy Committee~~ [inter-regional planning and will participate in WECC's planning activities as it deems appropriate](#). The Transmission Provider will post current links to WECC's procedures and guidelines on its public website as well as information detailing the Transmission Provider's participation in WECC's ~~regional~~ planning processes.

~~11.2 Other Regional Planning Activities~~

~~In addition to its participation in WECC processes, the Transmission Provider may engage neighbouring systems or sub-regional planning groups for the purpose of regional transmission planning and investment. As part of these regional planning activities, the Transmission Provider will seek opportunities to improve the overall efficiency and economic savings from increased inter-regional cooperation and integration. Once opportunities are identified, the Transmission Provider will seek to facilitate the required~~

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~~studies and implementation through working groups consisting of representatives from the Transmission Provider and other participating entities. The Transmission Provider will post on its public website information on such activities including notice of meetings, relevant materials and information on how interested parties may participate.~~

**9.2 BCCPG Regional Planning**

As a member of BCCPG, the Transmission Provider will follow BCCPG's policies and procedures for British Columbia regional planning and will participate in BCCPG's planning activities as it deems appropriate. The Transmission Provider will post current links to BCCPG's procedures and guidelines on its public website as well as information detailing the Transmission Provider's participation in BCCPG's planning processes.

**~~11.3~~ ~~Customer~~ 9.3 Participation in Inter-Regional and Regional Planning**

~~The Transmission Provider will provide on its public website information on how Stakeholders may participate in any of the Transmission Provider's regional planning activities, which may involve attending meetings, conference calls or submitting comments on particular projects. Stakeholders Interested Parties who are interested in any regional planning activities ~~are encouraged to~~ may contact the Transmission Provider's Point of Contact ~~so that the Transmission Provider may facilitate such~~ to obtain information with respect to opportunities for participation in these forums. ~~As described in Section 4, the Transmission Provider will also include a description of its regional planning activities in the Draft Study Plan, which customers may comment on and discuss with the Transmission Provider at the Consultation Meeting held for that purpose.~~~~

**10 Dispute Resolution Process**

The dispute resolution procedures described in Section 12 of the Tariff are not applicable to disputes arising from the transmission planning process described in this Attachment K. Interested Parties may bring to the attention of the Point of Contact any issue arising from the planning activities outlined in this Attachment K and the Transmission Provider will

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work with Interested Parties to attempt to resolve the issue. Interested Parties may also file a complaint with the BCUC with respect to any such issue.

**~~12.11.~~ Cost Allocation**

~~12.1~~ The Transmission Provider will recover the costs of projects required for meeting service requests and system improvements in accordance with the provisions ~~in~~of the ~~Transmission Provider's~~ Tariff.

~~12.2~~ The Transmission Provider is not ~~obliged~~obligated to expand the ~~system~~Transmission System based on the results of Economic Planning Studies. Where the Transmission Provider decides to construct facilities based on the results of one or more Economic Planning Studies, it will do so in accordance with ~~a~~any transmission expansion ~~or~~or congestion or other similar policy developed by the Transmission Provider and in effect at that time, subject to ~~Commission~~BCUC approval. In these cases, the Transmission Provider will apply the cost allocation principles of the applicable ~~transmission expansion or congestion~~ policy under which the project is developed, subject to ~~Commission~~BCUC approval.

**~~13.12.~~ No Participant Funding**

~~Stakeholders may participate in the Planning Process at their own cost. Interested Parties may participate in the activities associated with the transmission planning process described herein at their own cost.~~

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**Appendix 1 to Attachment K**

**Terms of Reference for Technical Review Groups**

~~Technical Review Groups formed in accordance with Attachment K are to be conducted in accordance with these Terms of Reference.~~

**1. Definitions**

~~(a) "Interested Person" means any transmission or interconnection customer or any other person directly impacted by the subject matter of a particular TRG and wishes to participate in the particular TRG;~~

~~(b) "Tariff" means the Transmission Provider's **Open Access Transmission Tariff** as may be amended from time to time by the British Columbia Utilities Commission; and~~

~~(c) "TRG" means a Technical Review Group formed pursuant to Attachment K of the Tariff.~~

**2. Purpose**

~~The TRG will provide an open, transparent forum whereby Interested Persons can review and provide feedback to the Transmission Provider in respect of planning alternatives for a transmission system requirement or opportunity identified by the Transmission Provider, which, in turn, provides a forum for the Transmission Provider to better understand the specific concerns of Interested Persons regarding planning alternatives to meet an identified transmission system requirement or opportunity.~~

**3. Establishment**

~~A TRG shall be established by the Transmission Provider in accordance with Attachment K of the Tariff. The TRG shall consist of at least one representative from the Transmission Provider, who shall be the facilitator, and representatives of at least two different Interested Persons.~~

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~~Participation in a TRG is entirely voluntary and done so at each Interested Person's own cost and expense.~~

**4. ~~Role of TRG~~**

~~The TRG may, with the benefit of results of any study determined to be relevant by the Transmission Provider, comment and provide feedback on planning alternatives to meet a transmission system requirement or opportunity identified by the Transmission Provider.~~

~~The TRG shall be advisory only and shall have no formal voting protocol.~~

**5. ~~Meetings~~**

**5.1 ~~General~~**

~~All meetings of a TRG will be open to all Interested Persons, subject to their agreement to comply with procedures to protect confidential or proprietary information as may be required by the Transmission Provider.~~

~~Meetings will be conducted to (i) provide an opportunity for the Transmission Provider to increase its understanding of Interested Persons' perspectives with respect to planning alternatives; (ii) offer Interested Persons an opportunity to be informed about transmission system requirements or opportunities identified by the Transmission Provider; (iii) review results of studies determined to be relevant by the Transmission Provider; and (iv) provide feedback with respect to planning alternatives.~~

**5.2 ~~Format~~**

~~In accordance with the terms of Attachment K, the Transmission Provider will post on the Planning Web Page the description of that identified requirement or opportunity and a brief review of the planning alternatives. An initial TRG meeting will be scheduled to, among other things, establish need for confidentiality, discuss views generally in relation to the planning alternatives and to submit written submissions, if desired. The Transmission~~

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~~Provider will then take away the input received from the Interested Persons and prepare a draft planning alternative informed by such input. The draft planning alternative will then be posted on The Planning Web Page for further review and comment by the Interested Persons within a specified period of time.~~

~~Although the TRG process is described sequentially, the actual activities may be performed on a flexible, iterative and non-sequential basis, depending on the needs and wishes of the Transmission Provider informed by input from the particular TRG.~~

**5.3 — Administrative Matters**

~~Meeting notices, including date, time, location and meeting agenda will be posted on the Transmission Provider's Planning Web Page. The agendas will identify the subject matter of the particular meeting, be posted on the Planning Web Page and be circulated to its distribution list in advance of the meetings to assist Interested Persons to choose their meeting attendance efficiently. A subscription page will be set up that allows Interested Persons to sign-up for email distribution.~~

~~The meetings will be informal and will be facilitated by a representative from the Transmission Provider, who will be responsible for guiding discussion, identifying issues to be covered, establishing governing rules as necessary and collecting appropriate information to inform the draft planning alternative.~~

~~Interested Persons are encouraged to provide, in a timely manner, input, comments, advice and questions into the process electronically by sending an email to the Transmission Provider's designated point of contact.~~

~~Where no confidentiality concerns have been raised and determined by the Transmission Provider to require any further action, the Transmission Provider will post all meeting-related notes, documents and draft or final planning alternatives on the Planning Web Page.~~

**6. — Draft Planning Alternative**

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~~While the Transmission Provider will be informed in its transmission planning by comments, input, feedback or recommendations from the TRG, any such comments, input, feedback or recommendations shall not be binding upon the Transmission Provider in any manner. In the event that a TRG is unable to reach a consensus on the attributes of a draft planning alternative, it shall be of no consequence to the Transmission Provider in its final determination of a planning alternative.~~

~~**7. Standards of Conduct**~~

~~Every TRG and all of its respective processes and procedures are subject to the Transmission Provider's Standards of Conduct.~~

~~**8. Confidentiality**~~

~~The Transmission Provider may, as a condition to participation, require Interested Persons to sign a non-disclosure agreement with respect to information gathered, exchanged or disclosed during the TRG process. Notwithstanding the foregoing, all of the information, input, comments and feedback provided in connection with a TRG will be deemed to be public and not confidential in nature unless otherwise expressly indicated to the Transmission Provider prior to disclosure to the Transmission Provider or TRG.~~

~~**9. Ownership**~~

~~Any and all documents, reports, analysis and other works prepared by a TRG shall be and remain the property of the Transmission Provider.~~

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**Appendix 3**

**Table Summarizing Changes**

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## Table of Changes

The table below summarizes the changes that have been made to the previously approved version of Attachment K.

### Summary of Changes to OATT Attachment K

Approved Version	Proposed Version	Section Name	Type of Change	Comments
1.	1.	Purpose and Description of Planning Process	Revised	The proposed version of Attachment K reflects transmission planning as undertaken by BC Hydro as an integrated utility to support open and non-discriminatory access to the Transmission System. The transmission planning process described in Attachment K can be applied to all current and future transmission planning activities undertaken by BC Hydro.
2.	2.	Definitions		
2.	-	Consultation Meeting	Renamed and revised	Changed to Transmission Planning Meeting. Moved certain process provisions to new section 3.2.2.
-	2.	BCCPG	New	Updated to include new definition required to describe aspects of regional planning that did not exist when Attachment K was last approved.
2.	2.	Economic Planning Studies	Revised	Updated based on definition in FERC Transmission Planning Process White Paper <sup>1</sup> . Moved certain process provisions to new section 6.1.
2.	-	First Nations Engagement Process	Removed	Definition not required. Currently this term is only used in section 3.6 and the proposed Attachment K is not as prescriptive with respect to outlining what additional information the Transmission Provider will post on its website. As noted in the proposed Attachment K, the transmission planning process outlined in Attachment K does not preclude further public and First Nations consultation in relation to planning, as appropriate or required.
-	2.	Interested Party	New and revised	Previously called Stakeholder.
2.	-	Initiation Phase	Removed	Definition not required.

<sup>1</sup> Federal Energy Regulatory Commission Transmission Planning Process White Paper (August 2, 2007) at page 15, available at <http://www.ferc.gov/industries/electric/indus-act/oatt-reform/order-890/white-paper.pdf>.

Approved Version	Proposed Version	Section Name	Type of Change	Comments
-	2.	NERC	New	New definition required.
2.	2.	Planning Manual	Revised	Updated with minor revision.
-	2.	Planning Process	Removed	Definition not required.
2.	2.	Point of Contact	Revised	Updated with minor revisions. Moved certain process provisions to new section 3.1.
2.	2.	Project	Revised	Updated the definition to reflect broader scope review undertaken during BC Hydro's different planning activities.
2.	-	Stakeholder	Renamed and revised.	Changed to Interested Party with minor revision.
2.	-	Study Phase	Removed	Definition not required.
2.	-	Study Plan Development Phase	Removed	Definition not required.
-	2.	Tariff	New	Term was used but not defined in approved version.
2.	-	Technical Review Group	Removed	Definition not required. Proposed version now refers to the broader term "focus groups".
2.	2.	Transmission Plan	Revised	Updated to clarify definition.
-	2.	Transmission Planning Meeting	New and revised	Previously called Consultation Meeting.
-	3.	Information Exchange	New	Section added to provide a single standardized description of different means to be used by the Transmission Provider to allow Interested Parties to participate in transmission planning.
3	4.	Initiation of a Planning Activity	Revised	<ul style="list-style-type: none"> <li>- Moved redundant information related to engagement to new section 3.</li> <li>- Minor updates to add increased definition around how planning activities will be initiated.</li> <li>- Minor updates to clarify and broaden the description of the type of information that can be included in a planning activity.</li> </ul>

Approved Version	Proposed Version	Section Name	Type of Change	Comments
4.	5.	Communication of the Scope of Transmission Plan Studies	Revised	<p>Previously called Study Plan Development Phase:</p> <ul style="list-style-type: none"> <li>- Moved redundant information related to engagement to new section 3.</li> <li>- Clarified that Attachment K reflects a single process that can be applied to any transmission planning activity undertaken by BC Hydro.</li> <li>- Reduced the prescriptive nature of Attachment K to allow flexibility in the application of transmission planning concepts to different planning activities while maintaining the openness and transparency requirements of FERC Order No. 890.</li> </ul>
5.	6.	Completion of Studies	Revised	<p>Previously called Study Phase.</p> <ul style="list-style-type: none"> <li>- Moved redundant information related to engagement to new section 3.</li> <li>- Minor changes to clarify the activities leading to the development of a preliminary set of Projects. Included reference to Economic Planning Studies.</li> </ul>
6.	7.	Transmission Plan Development	Revised	<p>Previously called Transmission Plan Development Phase.</p> <ul style="list-style-type: none"> <li>- Moved redundant information related to engagement to new section 3.</li> </ul>
7.	-	Inquiries	Moved	Moved to new section 3.6.
9.	8.	Confidentiality	Revised	Revised to reflect that details relating to the handling of confidential and security sensitive information will be included in business practices.
10.	-	Standards of Conduct	Removed	This provision is no longer required since planning information no longer falls within the definition of "Transmission function information" under BC Hydro's recently approved Standards of Conduct.
11.	9.	Inter-Regional and Regional Planning	Revised	Modified to include BCCPG. Moved redundant information related to engagement to new section 3.

Approved Version	Proposed Version	Section Name	Type of Change	Comments
8.	10.	Dispute Resolution Process	Revised	Revised to state that BC Hydro will work with Interested Parties to resolve disputes, but added clarification that dispute resolution under the Tariff is not applicable with respect to Attachment K.
12.	11.	Cost Allocation	Revised	Minor text revisions.
13.	12.	No Participant Funding	Revised	Minor text revisions.

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**Open Access Transmission Tariff (OATT)**

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**Appendix 4**

**Draft Order for Approval of Attachment K**

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**BRITISH COLUMBIA  
UTILITIES COMMISSION**

**ORDER  
NUMBER** G-

SIXTH FLOOR, 900 HOWE STREET, BOX 250  
VANCOUVER, BC V6Z 2N3 CANADA  
web site: <http://www.bcuc.com>

TELEPHONE: (604) 660-4700  
BC TOLL FREE: 1-800-663-1385  
FACSIMILE: (604) 660-1102

IN THE MATTER OF  
the Utilities Commission Act, R.S.B.C. 1996, Chapter 473

and

Application by British Columbia Hydro and Power Authority (BC Hydro)  
Amendment of Attachment K of the Open Access Transmission Tariff

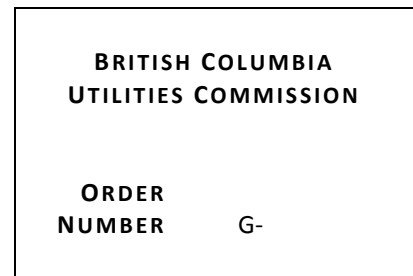
**BEFORE:**

, 2012

**ORDER**

**WHEREAS:**

- A. On September 16, 2010, British Columbia Hydro and Power Authority (BC Hydro), pursuant to sections 59 to 61 of the *Utilities Commission Act* (Act), submitted to the British Columbia Utilities Commission (Commission) an application to amend the Open Access Transmission Tariff (OATT) (2010 Application) to reflect the integration of BC Hydro and British Columbia Transmission Corporation (BCTC) pursuant to the *Clean Energy Act*, S.B.C. 2010, c. 16 (CEA).
- B. As part of the 2010 Application, BC Hydro sought an order from the Commission granting BC Hydro relief from compliance with the terms of the current Attachment K (Transmission Planning Process) to BC Hydro's OATT until January 1, 2012. Such relief was requested to allow BC Hydro to fully assess its transmission planning process and determine how it will proceed with compliance with the CEA in conjunction with the Act and the OATT;
- C. On December 9, 2010, the Commission issued Order No. G-192-10 approving, among other things, BC Hydro's request for relief from its obligations under the current Attachment K (Transmission Planning Process) of the OATT until January 1, 2012.
- D. On December 15, 2011, BC Hydro posted its proposed Attachment K for comment to BC Hydro OATT service customers on the Transmission-BC Hydro website.
- E. On December 16, 2011 BC Hydro also applied to the Commission for additional relief from its obligations under the current Attachment K (Transmission Planning Process) until January 31, 2012.
- F. On December 29, 2011 the Commission issued Order No. G-225-11 approving BC Hydro's request for relief from its obligations under the current Attachment K (Transmission Planning Process) until January 31, 2012.



- G. On January 3, 2012, the period for comment on the proposed Attachment K ended with one letter of comment (Letter of Comment) received.
- H. On January 25, 2012 BC Hydro, pursuant to sections 59 to 61 of the Act, submitted to the Commission an application for approval to amend Attachment K (Transmission Planning Process) of the OATT (Application) to reflect the transmission planning process of BC Hydro as an integrated electric utility having regard for the requirements of the CEA, the Act, and the transmission planning principles stipulated in FERC Order 890. Concerns raised in the Letter of Comment were addressed in the Application. BC Hydro requested that the revised Attachment K become effective at least four months after the date on which the new tariff sheets are approved.
- I. In the Application, BC Hydro also sought relief from its obligations under the current Attachment K (Transmission Planning Process) until such time as the Attachment K review process outlined in the Application is complete and the revised Attachment K is approved by the Commission and becomes effective.
- J. On January xx, 2012 the Commission issued Order No. G-xxx-xx approving BC Hydro's request for relief from its obligations under the current Attachment K (Transmission Planning Process) until such time as the Attachment K review process outlined in the Application is complete and the revised Attachment K is approved and becomes effective.
- K. On xxxx xx, 2012, the Commission issued OrderNo. G-xxx-xx establishing a regulatory process to review the Application materials, whereby xxxxxxxxxxxx
- L. Comments were received from xxxxxxxxxxxx
- M. BC Hydro responded to the comments received on xxxxxxxxxxxx
- N. The Commission has considered the Application, comments received and BC Hydro's response.

**NOW THEREFORE** the Commission orders as follows:

- 1. BC Hydro's proposed amendments to the OATT Attachment K (Transmission Planning) are approved and are effective four months from the date of this Order.

**DATED** at the City of Vancouver, in the Province of British Columbia, this      day of      , 2012.

BY ORDER

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**Open Access Transmission Tariff (OATT)**

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**Appendix 5**

**Draft Order for Continued Relief**

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**BRITISH COLUMBIA  
UTILITIES COMMISSION**

**ORDER  
NUMBER** G-

SIXTH FLOOR, 900 HOWE STREET, BOX 250  
VANCOUVER, BC V6Z 2N3 CANADA  
web site: <http://www.bcuc.com>

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BC TOLL FREE: 1-800-663-1385  
FACSIMILE: (604) 660-1102

IN THE MATTER OF  
the Utilities Commission Act, R.S.B.C. 1996, Chapter 473

and

Application by British Columbia Hydro and Power Authority (BC Hydro)  
Amendment of Attachment K of the Open Access Transmission Tariff

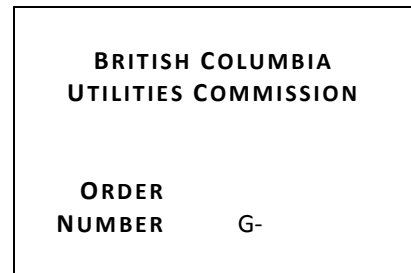
**BEFORE:**

, 2012

**ORDER**

**WHEREAS:**

- A. On September 16, 2010, British Columbia Hydro and Power Authority (BC Hydro), pursuant to sections 59 to 61 of the *Utilities Commission Act* (Act), submitted to the British Columbia Utilities Commission (Commission) an application to amend the Open Access Transmission Tariff (OATT) (2010 Application) to reflect the integration of BC Hydro and British Columbia Transmission Corporation (BCTC) pursuant to the *Clean Energy Act*, S.B.C. 2010, c. 16 (CEA).
- B. As part of the 2010 Application, BC Hydro sought an order from the Commission granting BC Hydro relief from compliance with the terms of the current Attachment K (Transmission Planning Process) to BC Hydro's OATT until January 1, 2012. Such relief was requested to allow BC Hydro to fully assess its transmission planning process and determine how it will proceed with compliance with the CEA in conjunction with the Act and the OATT;
- C. On December 9, 2010, the Commission issued Order No. G-192-10 approving, among other things, BC Hydro's request for relief from its obligations under the current Attachment K (Transmission Planning Process) of the OATT until January 1, 2012.
- D. On December 15, 2011, BC Hydro posted its proposed Attachment K for comment to BC Hydro OATT service customers on the Transmission-BC Hydro website.
- E. On December 16, 2011 BC Hydro also applied to the Commission for additional relief from its obligations under the current Attachment K (Transmission Planning Process) until January 31, 2012.
- F. On December 23, 2011, the Commission issued Order No. G-225-11 approving BC Hydro's request for relief from its obligations under the current Attachment K (Transmission Planning Process) until January 31, 2012.



- G. On January 3, 2012, the period for comment on the proposed Attachment K ended with one letter of comment (Letter of Comment) received.
- H. On January 25, 2012 BC Hydro, pursuant to sections 59 to 61 of the Act, submitted to the Commission an application for approval to amend the existing Attachment K (Transmission Planning Process) of the OATT (Application) to reflect the transmission planning process of BC Hydro as an integrated electric utility having regard for the requirements of the CEA, the Act, and the transmission planning principles stipulated in FERC Order 890. Concerns raised in the Letter of Comment were addressed in the Application.
- I. In the Application, BC Hydro also sought relief from its obligations under the current Attachment K (Transmission Planning Process) until such time as the Attachment K review process outlined in the Application is complete and the revised Attachment K is approved by the Commission and becomes effective.
- J. The Commission has considered BC Hydro’s request for relief from its obligations under Attachment K.

**NOW THEREFORE** the Commission orders as follows:

- 1. The Commission approves BC Hydro’s request for relief from its obligations under the current Attachment K of the OATT until revised Attachment K tariff pages are approved by the Commission and in effect.

**DATED** at the City of Vancouver, in the Province of British Columbia, this      day of      , 2012.

BY ORDER

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**Open Access Transmission Tariff (OATT)**

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**Appendix 6**

**Extracts from  
BCTC's 2008 Application to Amend the OATT**

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**2 – An Overview of Order No. 890 Reform**

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**1 2.0 AN OVERVIEW OF ORDER NO. 890 REFORM**

2 This Part has been included for background and is generally BCTC's summary of  
3 FERC commentary, except for Section 2.1.2 which is a summary of BCTC's tariff  
4 history.

**5 2.1 Background and Procedural History****6 2.1.1 Open Access Developments in the United States from 1980s****7 2.1.1.1 Legislative and Regulatory Acts Prior to Order No. 888**

8 Historically, many vertically integrated utilities did not allow independent power  
9 suppliers to use their transmission systems. Two pieces of legislation played a  
10 significant role in bringing about open access to the transmission systems in the  
11 United States: the Public Utilities Regulatory Policies Act of 1978 (PURPA) and the  
12 Energy Policy Act of 1992 (EPAcT 1992).

13 PURPA required electric utilities to interconnect with, and offer to purchase power  
14 from, qualifying cogeneration and small power production facilities at avoided cost  
15 rates set by state regulatory authorities. It gave FERC limited authority to order  
16 wholesale transmission on a case-by-case basis, upon application by an eligible  
17 entity. A consequence of PURPA was the emergence of a new class of power  
18 generators that were independent of traditional utilities.<sup>6</sup>

19 EPAcT 1992 allowed independent and affiliate generators to more easily enter the  
20 market to compete at wholesale and it expanded FERC's authority to order a  
21 transmitting utility to provide wholesale power transmission service, upon application  
22 on a case-by-case basis, to anyone selling power at wholesale. By the mid-1990s,  
23 FERC found that ordering wholesale transmission services case-by-case did not  
24 adequately address problems with undue discrimination in transmission access,  
25 which limited opportunities for wholesale power competition.<sup>7</sup>

26 To address the disparity in transmission service that utilities provided to third parties  
27 in comparison to their own uses of the transmission system,<sup>8</sup> FERC began requiring

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<sup>6</sup> Order No. 890, para. 14.

<sup>7</sup> Order No. 890, para. 16.

<sup>8</sup> Order No. 888, p. 5.

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## 2 – An Overview of Order No. 890 Reform

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1 transmission providers to “offer third parties access on the same or comparable basis,  
 2 and under the same or comparable terms and conditions, as the transmission  
 3 provider’s uses of its system.”<sup>9</sup> FERC applied this comparability standard in a variety  
 4 of contexts, culminating in a declaration that comparable services must be provided  
 5 through “open access” tariffs rather than only on a contract-by-contract basis. FERC  
 6 set for hearing 44 open access tariffs to determine what constituted comparable  
 7 service, all of which became subject to Order No. 888.<sup>10</sup>

### 8 **2.1.1.2 Order No. 888**

9 On 24 April 1996, FERC issued Order No. 888, which stated that it was designed “to  
 10 remove impediments to competition in the wholesale bulk power marketplace and to  
 11 bring more efficient, lower cost power to the Nation’s electricity consumers.” Order  
 12 No. 888 further stated that “[t]he legal and policy cornerstone of these rules is to  
 13 remedy undue discrimination in access to the monopoly owned transmission wires  
 14 that control whether and to whom electricity can be transported in interstate  
 15 commerce.”<sup>11</sup> To achieve its objective, Order No. 888 mandated that transmission  
 16 providers file open access transmission tariffs with “minimum terms and conditions of  
 17 non-discriminatory service” and offering Network, load-based service, point-to-point,  
 18 contract-based service, and ancillary services.<sup>12</sup> The pro forma tariff was “the basic  
 19 mechanism implementing the requirements of comparable open access  
 20 transmission.”<sup>13</sup>

21 Order No. 888 also required public utilities to “functionally unbundle” their wholesale  
 22 generation and transmission services.<sup>14</sup> Functional unbundling meant that  
 23 transmission providers took transmission service under the same tariff as other  
 24 transmission users (the comparability standard); separated rates for wholesale  
 25 generation, transmission, and ancillary services; and relied on the same Open  
 26 Access Same-Time Information System (OASIS) that its transmission customers

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<sup>9</sup> Order No. 888, p. 37, citing *American Electric Power Service Corporation*, 64 FERC ¶ 61,279 (1993), reh'g granted, 67 FERC ¶ 61,168; clarified 67 FERC ¶ 61,317 (1994).

<sup>10</sup> Order No. 888, pp. 35-41.

<sup>11</sup> Order No. 888, p. 1.

<sup>12</sup> Order No. 888, p. 4 to 5.

<sup>13</sup> Order No. 888-A, p. 21.

<sup>14</sup> Order No. 888, p. 57.

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**2 – An Overview of Order No. 890 Reform**

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1           relied on to obtain information about prices and available capacity of the transmission  
2           system.

**3   2.1.2   Development in BC****4   2.1.2.1   Wholesale Transmission Services (WTS) Tariff Decision**

5           In February 1997, BC Hydro filed a revised application to the Commission for WTS,  
6           outlining terms and conditions of its transmission services. BC Hydro modeled the  
7           WTS tariff on the Order No. 888 pro forma tariff.<sup>15</sup>

8           In the 1998 WTS Decision, the Commission approved BC Hydro's application for a  
9           tariff comparable to FERC's pro forma tariff (Tariff Supplement No. 30) as the tariff  
10          applicable for providing open-access transmission service on BC Hydro's  
11          transmission system. BCTC began its operations on 1 August 2003. From 1 August  
12          2003 to 31 March 2005, BCTC administered the WTS tariff on BC Hydro's behalf. On  
13          1 April 2005, BCTC began operating as a fully regulated independent utility offering  
14          wholesale transmission services under interim tariff terms and conditions approved by  
15          Commission Order G-25-05. The interim tariff "rolled over" the terms and conditions of  
16          the WTS tariff, with the necessary changes to reflect the fact that BCTC, not BC  
17          Hydro, was the transmission service provider.<sup>16</sup>

**18   2.1.2.2   The Commission's 2005 Approval of BCTC's OATT**

19          BCTC filed its first OATT application on 3 August 2004, seeking to replace BC  
20          Hydro's WTS tariff as the tariff applicable for the provision of open access  
21          transmission service on BC Hydro's transmission system. BCTC's proposed OATT  
22          remained comparable to the pro forma tariff to ensure consistency with other regional  
23          transmission providers. The proposed OATT included Point-to-Point (PTP)  
24          transmission service, Network Integration Transmission Service (NITS), and ancillary  
25          services and adopted, with adjustments to suit the BC market, most of the provisions  
26          of FERC's Standard Generator Interconnection Procedures (SGIP). In June 2005, the  
27          Commission approved BCTC's proposed OATT, subject to some modifications and  
28          directions.

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<sup>15</sup> *British Columbia Hydro and Power Authority, Wholesale Transmission Services* (April 23, 1998) (BCUC) at p. 30 [hereinafter, the "1998 WTS Decision"].

<sup>16</sup> *Application by British Columbia Transmission Corporation for Approval to Amend F2006 Rates* (March 8, 2005) Order G-25-05 (BCUC).

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**2 – An Overview of Order No. 890 Reform**

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1 On 2 February 2006, BCTC submitted a compliance filing, containing an OATT  
2 incorporating changes that resulted from the Commission's 2005 decision. The  
3 Commission approved the OATT tariff, which became effective 1 March 2006.

4 Since 1 March 2006, BCTC has made various other filings for amendments to the  
5 OATT, including filings related to restrictions on Network Economy service  
6 (Attachment Q) and the introduction of dynamic scheduling (Attachment O).

**7 2.2 Order No. 890**

8 In the years following Order No. 888, the electric industry continued to undergo  
9 economic and regulatory changes, such as the creation of Regional Transmission  
10 Organizations under FERC Order. No. 2000 and Standard Generator Interconnection  
11 Procedures under FERC Order No. 2003.<sup>17</sup>

12 On 16 September 2005, FERC issued a Notice of Inquiry seeking comments on the  
13 appropriate reforms of Order No. 888. Based on the comments received, FERC  
14 concluded that reform of the pro forma OATT was necessary to reduce the potential  
15 for undue discrimination and provide clarity in the obligations of transmission  
16 providers and customers.<sup>18</sup> Following the Notice of Inquiry, FERC issued a Notice of  
17 Proposed Rulemaking, in which it set out a proposal to remedy the flaws of Order No.  
18 888, and then Order No. 890 itself.<sup>19</sup>

19 Order No. 890 was issued on February 16, 2007 amending the pro forma tariff for the  
20 stated purposes of (1) strengthening the pro forma tariff to remedy opportunities for  
21 undue discrimination, (2) providing greater specificity to facilitate FERC's enforcement  
22 and monitoring; and (3) increasing the transparency of the rules for planning and use  
23 of the transmission system.<sup>20</sup>

24 While more of the details of the Order No. 890 reforms are discussed in Part 3 of this  
25 Application, the following outlines some of the key changes.

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<sup>17</sup> Order No. 890, paras. 19-21 and para. 26.

<sup>18</sup> Order No. 890, paras. 23-25.

<sup>19</sup> Order No. 890, para. 1.

<sup>20</sup> Order No. 890, cover page summary.

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**2 – An Overview of Order No. 890 Reform**

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**2.2.1 Consistency and Transparency of ATC Calculation**

Order No. 890 directs public utilities, working through the North American Electric Reliability Corporation (NERC) and North American Energy Standards Board (NAESB), to establish standards and business practices that ensure industry-wide consistency in ATC calculation components, calculation frequency, data inputs and exchange, and modeling assumptions. To increase transparency of ATC calculation, Order No. 890 requires that each transmission provider describe its ATC calculation methodology in Attachment C to its OATT.<sup>21</sup> This aspect of Order No. 890 will be considered further in Section 3.1 of this Application.

**2.2.2 Coordinated Open and Transparent Transmission Planning**

Order No. 890 requires transmission providers to have a coordinated, open, and transparent transmission planning process on both local and regional levels and to describe that process clearly in an Attachment K to the OATT.<sup>22</sup> The stated rationale for this requirement is to reduce opportunities for discrimination in transmission planning and to respond to declining transmission investment and increasing transmission congestion. This aspect of Order No. 890 will be considered further in Section 3.2 of this Application.

**2.2.3 Energy and Generation Imbalances**

Order No. 890 standardizes charges for generation and energy imbalance services by adopting a three-tired, graduated deviation band approach, based on incremental cost, accounting for the limited ability of intermittent resources to schedule precisely in advance, and providing an incentive for accurate scheduling. The standardized approach is designed to achieve more consistency amongst transmission providers in the application of energy imbalance charges and to provide the appropriate incentives to transmission customers. This aspect of Order No. 890 will be considered further in Section 3.3.1 of this Application.

**2.2.4 Credits for Network Customer Owned Facilities**

Order No. 890 establishes that to receive credits for its facilities, a transmission customer needs to demonstrate that its facilities are integrated into the operations of,

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<sup>21</sup> Order No. 890, paras. 207-210.

<sup>22</sup> Order No. 890, para. 437, fn. 246

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**2 – An Overview of Order No. 890 Reform**

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1 and provide benefits to, the transmission provider's grid. Prior to Order No. 890,  
2 Network Customers were able to receive credits for their new facilities only if the  
3 facilities were jointly planned with the transmission provider.<sup>23</sup> Order No. 890  
4 determines that the link between credits for new facilities and joint planning needs to  
5 be severed as it could act as a disincentive to coordinated planning, that is, to  
6 discourage a transmission provider from denying coordinated planning in order to  
7 avoid granting credits for customer-owned transmission facilities. This aspect of Order  
8 No. 890 will be considered further in Section 3.3.2 of this Application.

**9 2.2.5 Capacity Reassignment Pricing**

10 Order No. 890 lifts the price cap on reassignments of transmission capacity. Order  
11 No. 890 found that the price cap had served to reduce transmission options, impairing  
12 the development of a secondary market for transmission capacity.<sup>24</sup> Lifting the price  
13 cap is designed to develop the secondary market and give market participants  
14 additional options for acquiring transmission. This aspect of Order No. 890 will be  
15 considered further in Section 3.3.3 of this Application.

**16 2.2.6 Operational Penalties**

17 Order No. 890 specifies some circumstances when "operational penalties" will be  
18 assessed, including when a transmission customer uses transmission service that it  
19 has not reserved and when a transmission provider routinely fails to meet due  
20 diligence deadlines prescribed in the pro forma tariff.<sup>25</sup> Although Order No. 890 does  
21 not prescribe specific penalties or develop formulas for different violations in OATT,  
22 FERC's authority to assess civil penalties and fashion other remedies for OATT  
23 violations on a case-by-case basis is repeatedly asserted,<sup>26</sup> and revocation of an  
24 entity's market-based rate authority based upon a finding of specific factual nexus  
25 between an OATT violation and the entity's market-based rate authority is mentioned

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<sup>23</sup> Order No. 890, para. 729.

<sup>24</sup> Order No. 890, para. 779.

<sup>25</sup> See Order No. 890, paras. 834 and 1340.

<sup>26</sup> See Order No. 890, para. 1714. For instance, Order No. 890 states that it would evaluate the appropriateness of civil penalties in addition to unreserved use penalties on a case-by-case basis (Order No. 890, para. 842).

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**2 – An Overview of Order No. 890 Reform**

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1 as an available remedy.<sup>27</sup> This aspect of Order No. 890 will be considered further in  
2 Section 3.3.4 and 3.5.2 of this Application.

**3 2.2.7 Planning Redispatch and Conditional Firm Service**

4 Order No. 890 requires that transmission providers make available both a planning  
5 redispatch service and conditional firm service to long-term firm PTP service  
6 customers. Order No. 890 found that techniques involved in providing the service  
7 were used under certain conditions to serve native load and therefore comparable  
8 service should be available to transmission customers to avoid undue  
9 discrimination.<sup>28</sup> This aspect of Order No. 890 will be considered further in Section  
10 3.4 of this Application.

**11 2.2.8 Reform of Rollover Rights**

12 Order No. 890 extends the contract term eligible for the rollover right from one year to  
13 five years and increases the notice period for rollover from 60 days to one year before  
14 the expiration of contract. This aspect of Order No. 890 will be considered further in  
15 Section 3.5.1 of this Application.

**16 2.2.9 Reservation Priority**

17 To improve the overall functioning of the pro forma tariff, Order No. 890 amends and  
18 clarifies aspects of reservation priority provisions.

19 For example, Order No. 890 establishes the priority of pre-confirmed requests for  
20 transmission service to support the objective of efficient utilization of the transmission  
21 system by giving priority to customers that are committed to purchase service as well  
22 as by encouraging longer-term uses of the transmission system.<sup>29</sup>

23 As another example, Order No. 890 requests the transmission providers to propose a  
24 window period within which transmission service requests the transmission provider  
25 receives would be deemed to have been submitted simultaneously.<sup>30</sup>

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<sup>27</sup> Order No. 890, para. 1743.

<sup>28</sup> Order No. 890, para. 911.

<sup>29</sup> Order No. 890, para. 1401.

<sup>30</sup> Order No. 890, para. 1418.

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**2 – An Overview of Order No. 890 Reform**

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1           This aspect of Order No. 890 will be considered further in Section 3.5.3 of this  
2           Application.

3           **2.2.10 Designation of Network Resources**

4           Order No. 890 places new requirements on the qualification, documentation and  
5           undesignation of Network Resources by Network Customers so that future  
6           designations would be made in a more consistent, transparent manner. This aspect  
7           of Order No. 890 will be considered further in Sections 3.5.5, 3.5.6 and 3.5.7 of this  
8           Application.

9           **2.2.11 Creditworthiness**

10          Order No. 890 amends the pro forma tariff creditworthiness provisions and requires  
11          that they be included within a new Attachment L. The attachment is required to  
12          describe procedures and minimum information needed for a transmission provider to  
13          review the creditworthiness of its customers, including procedures to determine levels  
14          of secured and unsecured credit, types of acceptable collateral and security,  
15          procedures for providing notice of changes in credit levels, a procedure for providing  
16          customers written explanations of changes in credit determinations, and a reasonable  
17          opportunity for customers to post additional collateral or cure a lack of  
18          creditworthiness.<sup>31</sup> This aspect of Order No. 890 will be considered further in Section  
19          3.5.10 of this Application.

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<sup>31</sup> Order No. 890, paras. 1656-1658.

**3 – BCTC’s Proposed Changes in Response to Order No. 890**

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1 Attachment C filings are due 60 days after the date on which the relevant reliability  
2 standards or business practices take effect.

3 The NERC Board of Trustees has adopted the following standards: Available  
4 Transfer Capability, Transmission Reliability Margin Calculation Methodology, Area  
5 Interchange Methodology, and Rated System Path Methodology. Those standards  
6 have been filed with FERC.<sup>32</sup> The NERC Board of Trustees has deferred action on the  
7 violation risk factors for these standards, pending further analysis.<sup>33</sup>

8 BCTC will analyze relevant ATC calculation standards once they are all approved by  
9 FERC. BCTC will revise its ATC methodology in accordance with the relevant ATC  
10 calculation standards and file a revised Attachment C with the Commission for  
11 approval.

**12 3.2 Transmission Planning**

13 BCTC proposes a new Attachment K to its OATT that describes the planning process  
14 for the development of growth capital transmission projects.

15 BCTC’s proposed Attachment K planning process has four phases.

16 The initiation phase provides for the exchange of information between stakeholders  
17 and BCTC. Stakeholders will be provided with BCTC’s planning information so that  
18 they can participate in an informed way in the planning process. Customers will be  
19 asked to provide good faith estimates of their transmission service requirements for  
20 the 10 year planning horizon. Stakeholders may also submit requests for economic  
21 planning studies and other information that may be useful for BCTC’s planning, such  
22 as potential non-wires solutions to transmission investments.

23 The second phase is a study plan development phase in which BCTC develops a  
24 study plan for its growth capital projects. This is done in consultation with  
25 stakeholders, including a consultation meeting and an opportunity for stakeholders to  
26 provide written comments on a draft study plan.

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<sup>32</sup> NERC, ATC/TTC/AFC and CBM/TRM Revisions (Project 2006-07), <http://www.nerc.com/filez/standards/MOD-V0-Revision.html>.

<sup>33</sup> *Ibid.*

**3 – BCTC’s Proposed Changes in Response to Order No. 890**

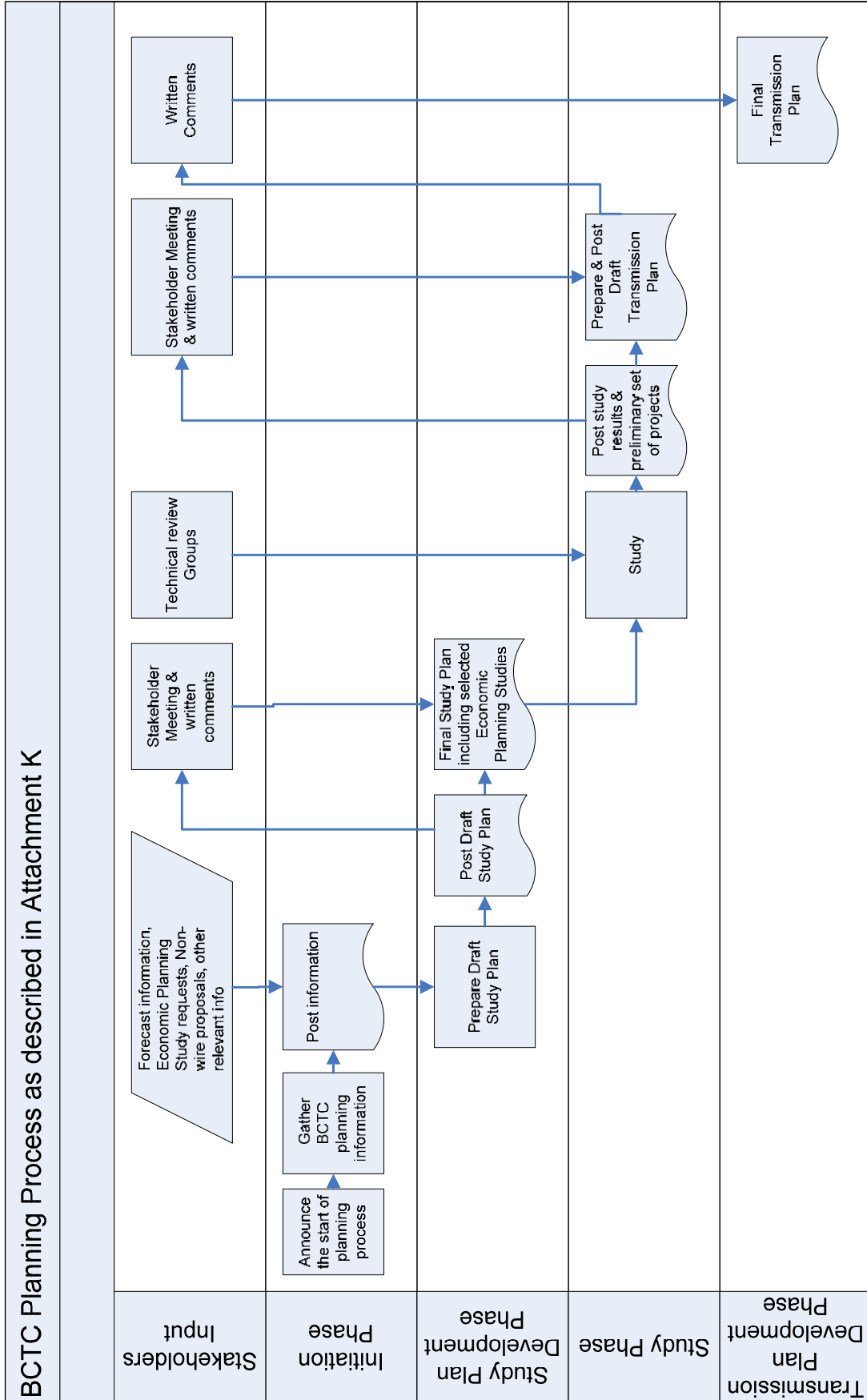
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1 The third phase is a study phase in which stakeholders may participate in technical  
2 review groups looking at particular projects of interest. This phase ends with a second  
3 consultation meeting to discuss and provide opportunities for comment on study  
4 results.

5 The final phase is a transmission plan development phase, in which BCTC develops  
6 and stakeholders may comment on a transmission plan, which is a collection of  
7 growth capital transmission projects in various stages of development that are  
8 designed to meet the potential needs and requirements of the transmission system as  
9 identified in the planning process. From this transmission plan, BCTC chooses  
10 projects for inclusion in its growth capital portfolio to be submitted to the Commission  
11 as part of its Capital Plan Application.

12 Figure 3-1 is a schematic diagram which outlines the planning process in BCTC’s  
13 proposed Attachment K.

Figure 3-1. BCTC Planning Process in Proposed Attachment K



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**3 – BCTC’s Proposed Changes in Response to Order No. 890**

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**3.2.1 Accompanying Amendments**

In accordance with Order No. 890, BCTC is proposing to amend its OATT to include references to the requirements of Attachment K. These amendments occur in sections 15.4, 16.1(e), 17.2(j), 28.2, 29.2(i), and 31.6 and are included in Appendix A to this Application. A number of these amendments require PTP and NITS customers to provide the information required by Attachment K as part of their requests for service.

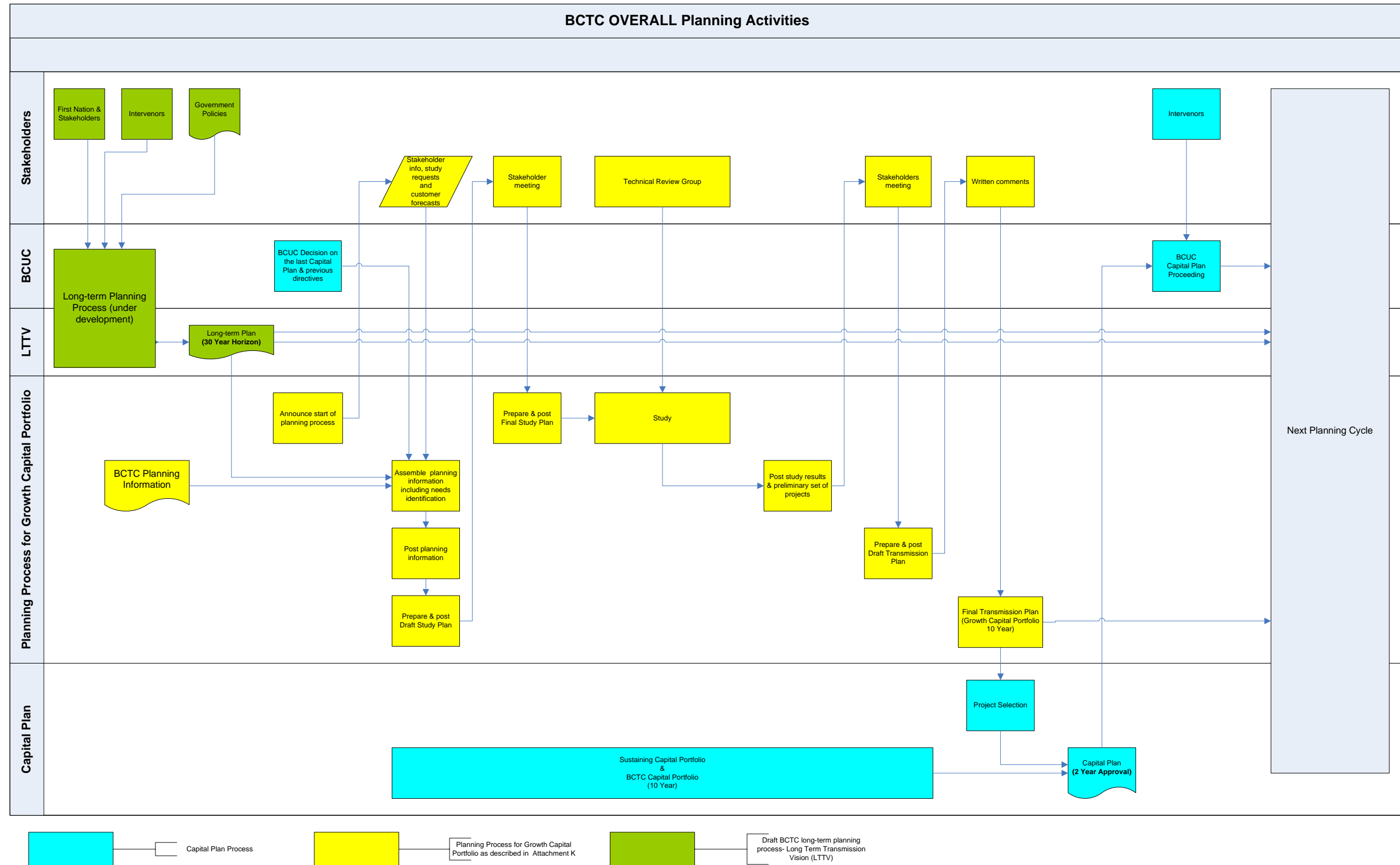
**3.2.2 Coordination with Other Planning Requirements**

The Attachment K planning process operates on a biennial schedule to coordinate with BCTC’s biennial filing of its capital plan with the Commission pursuant to section 44.2 and 45(6) of the UCA. As described above, the Attachment K planning process will produce a list of growth capital projects, out of which BCTC will select projects to be included in its BCTC’s Growth Capital Portfolio in the Capital Plan. Concurrent with the Attachment K planning process, BCTC will also be preparing its Sustaining and BCTC Capital Portfolios for inclusion in the Capital Plan.

Figure 3-2 is a diagram showing how the Attachment K process coordinates with BCTC’s other planning processes.

1

Figure 3-2. BCTC Overall Planning Activities



2

**3 – BCTC’s Proposed Changes in Response to Order No. 890**

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**3.2.3 Order No. 890 Planning Principles and BCTC's Attachment K**

BCTC’s proposed Attachment K responds to the requirement of Order No. 890 that each transmission provider must participate in and submit a coordinated and regional planning process that complies with nine planning principles: Coordination, Openness, Transparency, Information Exchange, Comparability, Dispute Resolution, Regional Participation, Economic Planning Studies, and Cost Allocation for New Projects. Order No. 890 requires the planning process to be documented in an attachment to the transmission provider’s OATT.<sup>34</sup>

The following summarizes the requirements of Order No. 890’s nine planning principles and reviews how BCTC’s proposed Attachment K satisfies each of the principles.

**3.2.3.1 Principle 1 – Coordination****3.2.3.1.1 Order No. 890 Requirements**

In order to satisfy the coordination principle, transmission providers must provide customers and other stakeholders with the opportunity to participate fully in the planning process. The purpose of the coordination requirement is to eliminate the potential for undue discrimination in planning by opening appropriate lines of communication between transmission providers, their transmission-providing neighbours, affected state authorities, customers, and other stakeholders. The planning process must provide for the timely and meaningful input and participation of customers and other stakeholders regarding the development of transmission plans, allowing customers and other stakeholders to participate in the early stages of development. In its planning process, each transmission provider must clearly identify the details of how its planning process will be coordinated with affected parties. While transmission providers must provide a reasonable and meaningful opportunity to meet, the number of meetings and the scope and format of such meetings are up to the transmission provider to determine. Affected parties must be given an opportunity to participate in the planning process to voice their concerns, not to “vote” on the transmission plan.<sup>35</sup>

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<sup>34</sup> Order No. 890, para. 437.

<sup>35</sup> See Order No. 890, paras. 445-454, and Order No. 890-A, paras 182-191.

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**3 – BCTC’s Proposed Changes in Response to Order No. 890**

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**3.2.3.1.2 BCTC’s Attachment K**

BCTC’s proposed Attachment K meets the coordination requirement in the following manner:

1. BCTC’s proposed process provides an appropriate line of communication that allows parties to participate and provide input into the planning process.
  - a) BCTC initiates its planning process by making an announcement on its public website as well as e-mailing the announcement to stakeholders. The stakeholder mailing lists will consist of stakeholders who have participated or have expressed interest in BCTC’s consultation processes as well as neighbouring transmission providers and the Commission. In the announcement, BCTC will include:
    - i. descriptions of the planning process, including milestones and anticipated schedules; and
    - ii. instructions to stakeholders for providing planning information to BCTC and submitting requests for economic planning studies.
  - b) BCTC will post its own and customer-provided planning information on its website, subject to confidentiality requirements. This information exchange takes place at the initiation of the planning process so that BCTC may take into account views expressed in developing its transmission plan and so that customers may participate in an informed manner.
  - c) The planning process includes two consultation meetings and, in addition, working groups that allow parties to provide input and written comments at each stage of the planning process.
    - i. One consultation meeting will be held during the Study Plan Development Phase. Prior to this consultation meeting, BCTC will provide stakeholders with a Draft Study Plan, which BCTC develops based on information exchanged earlier in the planning

### **3 – BCTC’s Proposed Changes in Response to Order No. 890**

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1 process, so that stakeholders will be able to make an informed  
2 contribution to the finalization of the Study Plan.

3 ii. During the Study Phase, BCTC will engage stakeholders  
4 impacted by specific issues by grouping them into subgroups,  
5 called Technical Working Groups, so that stakeholders can  
6 participate in a more detailed review of specific projects of  
7 interest.

8 iii. A second consultation meeting will be held at the completion of  
9 the Study Phase. Prior to this consultation meeting, BCTC will  
10 provide stakeholders with the results of studies performed in the  
11 Study Phase, including the results of Economic Planning studies.  
12 Stakeholders can comment on the results in the consultation  
13 meeting as well as provide written comments after the meeting.

14 iv. Stakeholders will also have the opportunity to comment on a draft  
15 transmission plan, which is a collection of growth capital projects  
16 in various stages of development that are designed to meet the  
17 potential needs and requirements of the transmission system as  
18 identified in the planning process.

19 d) BCTC will designate a “Point of Contact” as the single window for  
20 customers and stakeholders wishing to communicate with BCTC. This  
21 will ensure all inquiries from stakeholders will be dealt with efficiently.

22 2. As discussed further below, BCTC will coordinate on a regional basis through  
23 the Western Electricity Coordinating Council’s (WECC) regional planning  
24 processes. In the proposed Attachment K, BCTC commits to provide  
25 information to stakeholders with respect to their participation in these  
26 processes.

#### **3.2.3.2 Principle 2 – Openness**

##### **3.2.3.2.1 Order No. 890 Requirements**

29 In order to satisfy the openness principle under Order No. 890, transmission planning  
30 meetings must be open to all affected parties including, but not limited to, all

### **3 – BCTC’s Proposed Changes in Response to Order No. 890**

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1 transmission and interconnection customers, state commissions and other  
 2 stakeholders. Order No. 890 recognizes that it may be appropriate in certain  
 3 circumstances, such as at a particular meeting of a sub-regional group, to limit  
 4 participation to a relevant subset of these entities. But, as stressed by Order No. 890,  
 5 the overall development of the plan must remain open. While the process must be  
 6 open, confidential and security sensitive information must be managed through the  
 7 use of confidentiality agreements or password-protected access.<sup>36</sup>

#### 8 **3.2.3.2.2 BCTC’s Attachment K**

9 BCTC’s proposed Attachment K meets the openness principle in the following ways:

- 10 1. The planning process is open to all affected parties, such as transmission and  
 11 interconnection customers. This means that all affected parties may access  
 12 transmission planning information, participate in consultation meetings and  
 13 technical review groups, and provide written comments to BCTC.
- 14 2. BCTC will protect confidential and security sensitive information through the  
 15 use of confidentiality agreements. BCTC will develop a procedure for the  
 16 submitting and receiving of confidential information as indicated in Section 9  
 17 of Attachment K.

#### 18 **3.2.3.3 Principle 3 – Transparency**

##### 19 **3.2.3.3.1 Order No. 890 Requirements**

20 In order to satisfy the transparency principle, transmission providers must disclose to  
 21 all customers and other stakeholders the basic criteria, assumptions, and data that  
 22 underlie their transmission system plans. Order No. 890 concludes that this  
 23 information should enable customers, other stakeholders, or an independent third  
 24 party to replicate the results of planning studies and thereby reduce the incidence of  
 25 after-the-fact disputes regarding whether planning has been conducted in an unduly  
 26 discriminatory fashion. Among other things, Order No. 890 requires transmission

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<sup>36</sup> See Order No. 890, paras. 455-460, and Order No. 890-A, paras. 192-194.

### **3 – BCTC’s Proposed Changes in Response to Order No. 890**

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1 providers to make available information regarding the status of upgrades identified in  
2 their transmission plans in addition to the underlying plans and related studies.<sup>37</sup>

#### 3 **3.2.3.3.2 BCTC’s Attachment K**

4 BCTC’s proposed Attachment K meets the transparency principle in the following  
5 ways:

- 6 1. BCTC will post available planning information on its public web site. This  
7 information will include BCTC’s “Planning Manual,” which is a document  
8 BCTC will prepare to include its basic methodology, criteria and assumptions  
9 for its planning process.
- 10 2. Planning information that is subject to confidentiality or is security sensitive  
11 will only be released under protection of a confidentiality agreement.
- 12 3. In addition to providing stakeholders information on BCTC’s planning  
13 methodologies and criteria, BCTC will engage interested stakeholders in the  
14 Study Phase as part of the Technical Review Groups so that interested  
15 stakeholders may understand how BCTC arrives at the study results.

#### 16 **3.2.3.4 Principle 4 – Information Exchange**

##### 17 **3.2.3.4.1 Order No. 890 Requirements**

18 In order to satisfy the information exchange principle in Order No. 890, transmission  
19 providers must develop guidelines and a schedule for the submittal of information in  
20 consultation with their Network and PTP customers. Order No. 890 stresses that  
21 information collected by transmission providers to provide transmission service to  
22 their native load customers must be transparent and that equivalent information must  
23 be provided by transmission customers to ensure effective planning and  
24 comparability. PTP customers are also required to submit any projections that they  
25 have of a need for service over the planning horizon. The information exchanged  
26 should focus on system planning, not on studies in response to interconnection or  
27 transmission service requests.<sup>38</sup>

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<sup>37</sup> See Order No. 890, paras. 461-479, and Order No. 890-A, paras. 195-202.

<sup>38</sup> See Order No. 890, paras. 480-488, and Order No. 890-A, paras. 203-207.

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**3 – BCTC’s Proposed Changes in Response to Order No. 890**

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**3.2.3.4.2 BCTC’s Attachment K**

BCTC’s proposed Attachment K meets the information exchange principle in the following ways:

1. As part of announcing the initiation of the planning process, BCTC will provide a schedule for
  - (a) customers to provide planning information, including a forecast of loads and resources from Network Customers and a projection of the need and usage of PTP service from PTP customers; and
  - (b) customers and other stakeholders to provide additional information, including information on non-wires solutions that may defer or offset transmission investments.
2. BCTC makes its own planning information available to customers through its public web site.
3. BCTC will develop procedures in its business practices for customers and stakeholders for submitting information to BCTC, including data submission forms, to facilitate the exchange of information electronically.
4. BCTC will review with stakeholders in the initial consultation meeting how this information is used for planning.

**3.2.3.5 Principle 5 – Comparability****3.2.3.5.1 Order No. 890 Requirements**

Under the comparability principle, transmission providers must develop, after considering the data and comments supplied by customers and other stakeholders, a transmission system plan that meets the specific service requests of their transmission customers and otherwise treats similarly-situated customers (e.g., Network and retail native load) comparably in transmission system planning. Order No. 890 also requires that, where appropriate, customer demand resources be

### **3 – BCTC’s Proposed Changes in Response to Order No. 890**

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1            considered on a comparable basis to the service provided by comparable generation  
2            resources.<sup>39</sup>

#### 3    **3.2.3.5.2    BCTC’s Attachment K**

4            BCTC’s Attachment K meets the comparability principle in the following ways:

- 5            1.        Requests for specific PTP transmission service, Network service, and  
6            interconnection service will be treated in accordance with the OATT. The  
7            proposed Attachment K does not change these service request processes.
- 8            2.        All customers are required to provide information over the same 10-year  
9            planning horizon.
- 10          3.        All customers will be provided the same opportunities to participate in the  
11          planning process.
- 12          4.        Non-wires solutions proposed by customers or stakeholders will be  
13          considered on a comparable basis to the service provided by comparable  
14          transmission alternatives. BCTC proposes to develop criteria and to document  
15          the criteria in the Planning Manual on how these resources will be treated on a  
16          comparable basis.

#### 17    **3.2.3.6    Principle 6 – Dispute Resolution**

##### 18    **3.2.3.6.1    Order No. 890 Requirements**

19            In order to satisfy the dispute resolution principle, transmission providers must have a  
20            dispute resolution process to manage disputes that arise from the planning process.  
21            Order No. 890 states that the dispute resolution process must address both  
22            procedural and substantive planning issues, as the purpose for including a dispute  
23            resolution process is to provide a means for parties to resolve all disputes related to  
24            the planning process before turning to FERC.

25            Order No. 890 encourages the development of a three-step dispute resolution  
26            process consisting of negotiation, mediation, and arbitration. If appropriate,

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<sup>39</sup> See Order No. 890, paras. 489-495, and Order No. 890-A, paras. 208-216.

**3 – BCTC’s Proposed Changes in Response to Order No. 890**

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1 transmission providers may rely on existing dispute resolution processes already  
2 contained in their OATT.<sup>40</sup>

**3 3.2.3.6.2 BCTC’s Attachment K**

4 BCTC does not propose to provide an additional dispute resolution process related to  
5 the Attachment K planning process. BCTC notes that the legislative framework in  
6 British Columbia, and the role of the Commission within that framework, provides a  
7 more efficient forum than may exist in the United States, where FERC has jurisdiction  
8 over wholesale transmission but state regulators maintain an important role in  
9 ensuring resource adequacy. BCTC believes that if there are any disputes arising  
10 from the planning process that cannot be resolved informally between stakeholders  
11 and BCTC, then any stakeholder may raise the issue to the Commission in the  
12 context of a review of a BCTC capital plan, or by way of the Commission’s complaint  
13 process. BCTC believes that this process is preferable to a three-stage arbitration  
14 process, which could potentially delay or otherwise affect BCTC’s capital planning  
15 processes and thereby interfere with BCTC’s ability to comply with the planning  
16 requirements in the UCA .

**17 3.2.3.7 Principle 7 – Regional Participation****18 3.2.3.7.1 Order No. 890 Requirements**

19 In order to satisfy the regional participation principle, transmission providers must  
20 coordinate with interconnected systems (1) to share system plans to ensure that they  
21 are simultaneously feasible and otherwise use consistent assumptions and data, and  
22 (2) to identify system enhancements that could relieve congestion or integrate new  
23 resources. FERC explained that the specific features of the regional planning effort  
24 should take account of and accommodate, where appropriate, existing institutions, as  
25 well as physical characteristics of the region and historical practices.<sup>41</sup>

**26 3.2.3.7.2 BCTC’s Attachment K**

27 BCTC’s Attachment K meets the regional planning principle as follows:

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<sup>40</sup> See Order No. 890, paras. 496-503, and Order No. 890-A, paras. 217-221.

<sup>41</sup> See Order No. 890, paras. 504-528, and Order No. 890-A, paras. 222-227.



### **3 – BCTC’s Proposed Changes in Response to Order No. 890**

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1           (d)     The Transmission Planning Protocol of WECC’s Transmission  
 2                     Expansion Planning Policy Committee (TEPPC) supports and  
 3                     coordinates Economic Planning Studies on a regional basis. TEPPC’s  
 4                     role includes preparing and making available a transmission economic  
 5                     planning database, conducting transmission economic planning  
 6                     studies as part of a Western Interconnection synchronized study cycle,  
 7                     and facilitating collaborative efforts among subregional planning  
 8                     groups within the Western Interconnection. TEPPC prioritizes  
 9                     Economic Planning Studies and identifies the party (i.e., TEPPC, a  
 10                    subregional group or individual transmission provider) best able to  
 11                    conduct the study.

12           3.     BCTC’s other regional planning initiatives are done through direct interaction  
 13                   with neighbouring systems.

14           4.     As stated in Section 11 of Attachment K, BCTC will post on its public website  
 15                   information on its regional planning activities, including its coordination with  
 16                   WECC and bilateral planning meetings. BCTC will also review its regional  
 17                   planning activities with stakeholders at consultation meetings, including any  
 18                   opportunities for stakeholders to participate in such activities.

#### 19   **3.2.3.8     Principle 8 – Economic Planning Studies**

##### 20   **3.2.3.8.1    Order No. 890 Requirements**

21           The economic planning studies principle in Order No. 890 requires transmission  
 22                   providers to take into account both reliability and economic considerations in their  
 23                   planning processes. The purpose of this principle is to ensure that customers may  
 24                   request studies that evaluate potential upgrades and other investments that could  
 25                   reduce congestion or integrate new resources and loads on an aggregated or  
 26                   regional basis. Customers should be permitted to choose the studies that are of the  
 27                   greatest value to them, directing transmission providers to develop a means to allow  
 28                   the transmission provider and stakeholders to cluster or batch requests for economic  
 29                   planning studies so that the transmission provider may perform the studies in the  
 30                   most efficient manner. Customers must be given the right to request a defined  
 31                   number of studies annually, the costs of which will be recovered as a part of the

### **3 – BCTC’s Proposed Changes in Response to Order No. 890**

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1 overall pro forma tariff cost of service. Order No. 890, however, is clear that  
 2 transmission providers are not obligated to provide service as a result of the request  
 3 for economic planning studies or to fund economic projects.

4 Order No. 890 requires that a transmission provider clearly describe the process by  
 5 which economic planning studies can be requested and how they will be prioritized.  
 6 Additionally, it requires customers, stakeholders and merchants to provide economic  
 7 data.<sup>42</sup>

#### **3.2.3.8.2 BCTC’s Attachment K**

9 BCTC’s Attachment K meets the economic planning studies principle in the following  
 10 ways:

- 11 1. In the initiation phase of the process, stakeholders have the opportunity to  
 12 submit requests for economic planning studies, which will be posted on  
 13 BCTC’s Internet website.
- 14 2. In its draft study plan, BCTC will provide its proposed selection criteria for the  
 15 requested economic planning studies. At the initial consultation meeting,  
 16 BCTC will review the selection criteria with customers and determine if any  
 17 economic planning studies can be combined and the number of studies to be  
 18 performed.
- 19 3. Customers will have the opportunity to provide written comments on BCTC’s  
 20 selection criteria before BCTC selects the economic planning studies to be  
 21 performed.
- 22 4. The economic planning studies will be performed at the same time as other  
 23 studies so that consistent assumptions and data are used.
- 24 5. BCTC will present the results of the economic studies, but has no obligation to  
 25 fund, assign cost responsibility, or otherwise determine whether any economic  
 26 project should be implemented.

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<sup>42</sup> See Order No. 890, paras. 529-551, and Order No. 890-A, paras. 228-240.



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**3 – BCTC’s Proposed Changes in Response to Order No. 890**

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1 results of one or more Economic Planning Studies, it will do so in accordance  
2 with its transmission expansion policy, subject to Commission approval. In  
3 these cases, BCTC will apply the cost allocation principles of the applicable  
4 transmission expansion policy under which the project is developed, subject to  
5 Commission approval.

**6 3.2.4 Consultation**

7 BCTC consulted customers and stakeholders on its approach to Attachment K and  
8 provided a draft Attachment K for comments by customers and stakeholders, which  
9 are described in Appendix D. Customers’ comments were generally supportive of  
10 BCTC’s Attachment K proposal.

**11 3.3 Transmission Pricing****12 3.3.1 Energy and Generator Imbalance Service**

13 BCTC proposes not to adopt the Order No. 890 amendments related to Energy and  
14 Generator Imbalance service. Instead, BCTC proposes to retain its current energy  
15 imbalance service rate design as approved by the Commission. In reviewing the  
16 current wording of the rate schedule for Energy Imbalance Service, BCTC identified  
17 some opportunities to simplify the wording and these minor changes are reflected in  
18 Schedule 06 of the redlined OATT in Appendix A. In principle, BCTC’s Commission-  
19 approved energy imbalance rate design complies with Order No. 890. The following  
20 summarizes Order No. 890’s requirements, reviews BCTC’s current provisions  
21 related to energy imbalance service, and explains BCTC’s rationale for not adopting  
22 Order No. 890’s requirements.

**23 3.3.1.1 Order No. 890 Energy and Generator Imbalance Service**

24 Order No. 890 intends to standardize energy and generator imbalance service in  
25 order to provide overall consistency in the provision of service, to improve the  
26 incentive for accurate scheduling, and to relate imbalance charges to the cost of  
27 providing such service. The new imbalance provisions in Order No. 890 are based on  
28 three principles:

- 29 (a) The charges for service must be based on incremental cost or some multiple  
30 thereof;

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**Open Access Transmission Tariff (OATT)**

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**Appendix 7**

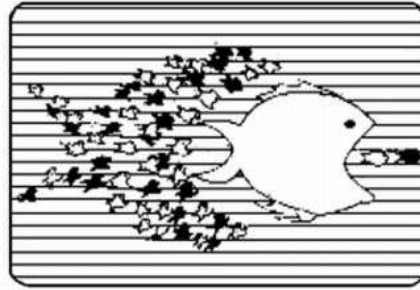
**BCOAPO Comments,  
BC Hydro Acknowledgement of BCOAPO Comments,  
Table Responding to BCOAPO Comments, and Black-line  
Comparing Posted Draft vs. Proposed Attachment K**

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**The  
British Columbia  
Public Interest  
Advocacy Centre**

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January 3, 2012

Ms. Janet Fraser  
Chief Regulatory Officer  
British Columbia Hydro and Power Authority  
333 Dunsmuir Street  
Vancouver BC V6B 5R3

Dear Ms. Fraser:

**Re: British Columbia Utilities Commission (BCUC)  
British Columbia Hydro and Power Authority (BC Hydro)  
Open Access Transmission Tariff (OATT)  
Application to Amend Attachment C**

On December 16, BC Hydro filed with the Commission a letter indicating that it was seeking comments from parties on the requested Amendment of the OATT's Appendix K by January 3, 2012. These are the brief comments of BCOAPO et al.

**SECTION 1**

- Pages 1-2 of the draft outline three forms of transmission planning activities. It is assumed, but not readily apparent that the planning phases outlined in the revised Sections 4, 5, 6 and 7 apply to all three types of activities. In our opinion, this should be clarified. If this assumption is incorrect, BC Hydro should consider applying Sections 4, 5, 6, and 7 to the three forms of transmission planning activities.

**SECTION 2**

- The definition of an "Interested Party" (page 3) is based on persons who have an interest "so as to ensure comparable open access transmission service and limit the potential for undue discrimination". However, it is likely that there are other reasons why persons may have a legitimate interest in the Transmission Provider's transmission planning process. These include First Nations with concerns regarding impact on aboriginal land claims and traditional land use, local municipalities and residents with concerns about impact on land use and the environment, and BC Hydro ratepayers concerned with rates and bill impacts. In our submission, a more inclusive wording is needed such as the one found in the current Attachment K which defines

an “Interested Party” as any person or group of persons affected by the Planning Process.

- The revised Attachment K does not include definitions for either “Customer” (as used in Section 4.1 – first paragraph) or “Eligible Customer” (as used in Section 4.1 – last paragraph). This should be addressed.

### **SECTION 3**

- In the current Attachment K there is a single Point of Contact designated for all transmission planning processes (see Definitions in Section 2). In contrast, the revised Attachment K appears to anticipate there potentially being a separate Point of Contact for each planning process (see revised Section 3.1). A related issue is the fact that under the current Attachment K the Transmission Provider maintains a single mailing list of stakeholders/interested parties (Section 2.2) which is used to notify interested parties regarding the initiation of all planning processes (Section 3.1).
- Also the revised Section 4 envisions the Transmission Provider announcing the initiation of a planning activity via electronic mail (to Interested Parties) and on its public website. However, there is no provision in the revised Attachment K for the maintenance of a comprehensive mailing list of Interested Parties like there is in the current version. This omission, combined with the apparent lack of a standard contact, increases the likelihood that some Interested Parties to a particular planning process will not receive early notification that the planning process has been initiated. Even in current regulatory processes, there are participants who do not have access to email or the internet who would be affected by this change.
- Overall, the approach used in the existing Attachment K where there is a single Point of Contact for all planning processes and a single contact list used to notify parties of upcoming planning processes (and on which parties can ask to be placed) is preferable and likely to ensure maximum opportunities for interested parties to become aware and participate.

### **SECTION 4**

- It is assumed that “Initiation of a Planning Activity” is a separate and unique planning process that is used as input to and precedes the development and posting of the Draft Scope of Transmission Planning Studies as described in Section 5. If this is not the case, it should be.
- The last paragraph in this section (bottom of page 8) suggests that the Transmission Provider is only obligated to consider solutions and opportunities that have been suggested by either Eligible Customers or Interested Parties and for which the required information is provided. BCOAPO respectfully disagrees. The primary obligation for transmission planning falls to the Transmission Provider. It is the Transmission Provider who is responsible for identifying and considering potential solutions that are technically feasible and at least potentially the most cost effective.

At the end of the process it is the Transmission Provider who is accountable for explaining why potential solutions were or were not included for study. BCOAPO does not support any wording that may suggest the exclusion of certain potential and reasonably obvious solutions could be justified simply on the basis that they were not raised by any of the Interested Parties during the Initiation or Draft Scope phases (as described in Sections 4 and 5) and to place this responsibility solely on Interested Parties is unfair and prejudicial especially since parties to these processes are required to participate without participant funding (per revised Section 12). For some, this will severely limit their ability to explore/support potential solutions during the planning processes described in Attachment K.

### **SECTIONS 5 and 7**

- Section 5 should require that the Transmission Provider formally notify Interest Parties when either; a) the information outlined in Section 5.1 or b) the final scope document described in Section 5.2 have been posted on its website. Similarly, Section 7.1 should require the Transmission Provider to formally notify Interested Parties when the Draft Transmission Plan has been posted on its website. It is noted that such notification of the Preliminary Set of Projects is required in Section 6.4.

Please do not hesitate to contact the undersigned should you have any questions regarding the feedback provided.

Sincerely,

**BC PUBLIC INTEREST ADVOCACY CENTRE**

*Original in file signed by*

Leigha Worth  
Acting Executive Director  
Barrister & Solicitor



**Janet Fraser**

Chief Regulatory Officer

Phone: 604-623-4046

Fax: 604-623-4407

[bhydroregulatorygroup@bhydro.com](mailto:bhydroregulatorygroup@bhydro.com)

January 12, 2012

The British Columbia Public Interest Advocacy Centre  
208-1090 West Pender Street  
Vancouver BC V6E 2N7

Attention: Leigha Worth

Dear Ms. Worth:

**RE: British Columbia Hydro and Power Authority (BC Hydro)  
Open Access Transmission Tariff (OATT)  
Application to Amend Attachment K  
BC Hydro Response to British Columbia Old Age Pensioners' Organization  
(BCOAPO) Comments**

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BC Hydro writes to acknowledge receipt of BCOAPO's letter of January 3, 2012 providing comments regarding the draft amendment to Attachment K of the OATT.

BC Hydro wishes to advise the BCOAPO that the issues and concerns identified in its letter, will be addressed in the application to the BCUC requesting approval of the amendment to Attachment K.

BC Hydro thanks the BCOAPO for providing these comments which have been helpful in finalizing the materials to be submitted to the BCUC later this month.

Yours sincerely,

A handwritten signature in black ink that appears to read 'Janet Fraser'.

Janet Fraser

Chief Regulatory Officer

sj/ma

**BCOAPO Comments and BC Hydro Responses**

<b>BCOAPO Comment</b>	<b>BC Hydro Response</b>
<b>SECTION 1</b>	
<p>Pages 1-2 of the draft outline three forms of transmission planning activities. It is assumed, but not readily apparent that the planning phases outlined in the revised sections 4, 5, 6 and 7 apply to all three types of activities. In our opinion, this should be clarified. If this assumption is incorrect, BC Hydro should consider applying sections 4, 5, 6, and 7 to the three forms of transmission planning activities.</p>	<p>Attachment K describes a single transmission planning process that will be applied to all three types of planning activities. BC Hydro has revised section 1 of Attachment K to read: "This Attachment K describes a process to be followed for each of the Transmission Provider's three forms of transmission planning activities as set out below. Each transmission planning activity will include the generic planning elements described in this Attachment K as part of the broader planning requirements of the activity."</p>
<b>SECTION 2</b>	
<p>The definition of an "Interested Party" (page 3) is based on persons who have an interest "so as to ensure comparable open access transmission service and limit the potential for undue discrimination". However, it is likely that there are other reasons why persons may have a legitimate interest in the Transmission Provider's transmission planning process. These include First Nations with concerns regarding impact on aboriginal land claims and traditional land use, local municipalities and residents with concerns about impact on land use and the environment, and BC Hydro ratepayers concerned with rates and bill impacts. In our submission, a more inclusive wording is needed such as the one found in the current Attachment K which defines an "Interested Party" as any person or group of persons affected by the Planning Process.</p>	<p>BC Hydro did not intend to change the scope of parties who may participate in the Attachment K planning process. To avoid confusion, BC Hydro has reverted back to the definition that was used for "Stakeholder" in the existing version of Attachment K. The revised definition of "Interested Party" is as follows: "Interested Party means any person affected by the planning process described in this Attachment K, such as a transmission customer, interconnection customer, or neighbouring transmission provider."</p>
<p>The revised Attachment K does not include definitions for either "Customer" (as used in section 4.1 – first paragraph) or "Eligible Customer" (as used in section 4.1 – last paragraph). This should be addressed.</p>	<p>Eligible Customer is an OATT defined term and since Attachment K is an attachment to the OATT, it is not necessary to redefine this term. BC Hydro has corrected the reference to "Customers" in section 4.1 to read as "Eligible Customers".</p>
<b>SECTION 3</b>	
<p>In the current Attachment K there is a single Point of Contact designated for all transmission planning processes (see Definitions in section 2). In contrast, the revised Attachment K appears to anticipate there potentially being a separate Point of Contact for each planning process (see revised section 3.1). A related issue is the fact that under the current Attachment K the Transmission Provider maintains a single mailing list of stakeholders/interested parties (section 2.2) which is used to notify interested parties regarding the initiation of all planning processes (section 3.1).</p>	<p>The designation of Points of Contact will be defined in business practices which are under development. Due to the varied nature of transmission planning activities undertaken by BC Hydro in the context of an integrated electrical utility, a single point of contact for all transmission planning activities is not feasible. The business practices will include centralized and clear instructions for participation by Interested Parties. Also, BC Hydro has revised section 3.1 to include the maintenance of a comprehensive mailing list of Interested Parties.</p>

<b>BCOAPO Comment</b>	<b>BC Hydro Response</b>
<p>Also the revised section 4 envisions the Transmission Provider announcing the initiation of a planning activity via electronic mail (to Interested Parties) and on its public website. However, there is no provision in the revised Attachment K for the maintenance of a comprehensive mailing list of Interested Parties like there is in the current version. This omission, combined with the apparent lack of a standard contact, increases the likelihood that some Interested Parties to a particular planning process will not receive early notification that the planning process has been initiated. Even in current regulatory processes, there are participants who do not have access to email or the internet who would be affected by this change.</p>	<p>As indicated above, BC Hydro has revised section 3.1 of Attachment K to include the maintenance of a comprehensive mailing list of Interested Parties.</p> <p>It is expected that the Attachment K business practices will include automatic notification to Interested Parties of information posted on BC Hydro’s public website. Interested Parties will require access to this website to view posted information and email access to receive the automatic notifications and to submit any information to the Point of Contact. This is consistent with the existing Attachment K and how BC Hydro currently communicates with its transmission customers regarding information bulletins.</p> <p>It is also noted that a planning activity may involve a large amount of technical material which is most efficiently shared and viewed electronically. Requiring hard copies to be mailed to Interested Parties would increase the burden and cost of the transmission planning process and, in BC Hydro’s view, is not necessary.</p>
<p>Overall, the approach used in the existing Attachment K where there is a single Point of Contact for all planning processes and a single contact list used to notify parties of upcoming planning processes (and on which parties can ask to be placed) is preferable and likely to ensure maximum opportunities for interested parties to become aware and participate.</p>	<p>Please see BC Hydro’s response above.</p>
<b>SECTION 4</b>	
<p>It is assumed that “Initiation of a Planning Activity” is a separate and unique planning process that is used as input to and precedes the development and posting of the Draft Scope of Transmission Planning Studies as described in section 5. If this is not the case, it should be.</p>	<p>BC Hydro confirms that this is the intent.</p>
<p>The last paragraph in this section (bottom of page 8) suggests that the Transmission Provider is only obligated to consider solutions and opportunities that have been suggested by either Eligible Customers or Interested Parties and for which the required information is provided. BCOAPO respectfully disagrees. The primary obligation for transmission planning falls to the Transmission Provider. It is the Transmission Provider who is responsible for identifying and considering potential solutions that are technically feasible and at least potentially the most cost</p>	<p>BC Hydro has revised the last paragraph of section 4.1 to clarify that the Transmission Provider is to plan the Transmission System based on the information available. It was not BC Hydro’s intention to limit the Transmission Provider’s responsibility to identify solutions or opportunities that are technically feasible and cost effective.</p>

<b>BCOAPO Comment</b>	<b>BC Hydro Response</b>
effective.	
<p>At the end of the process it is the Transmission Provider who is accountable for explaining why potential solutions were or were not included for study. BCOAPO does not support any wording that may suggest the exclusion of certain potential and reasonably obvious solutions could be justified simply on the basis that they were not raised by any of the Interested Parties during the Initiation or Draft Scope phases (as described in sections 4 and 5) and to place this responsibility solely on Interested Parties is unfair and prejudicial especially since parties to these processes are required to participate without participant funding (per revised section 12). For some, this will severely limit their ability to explore/support potential solutions during the planning processes described in Attachment K.</p>	<p>Please see BC Hydro's responses above.</p>
<b>SECTIONS 5 and 7</b>	
<p>Section 5 should require that the Transmission Provider formally notify Interested Parties when either; a) the information outlined in section 5.1 or b) the final scope document described in section 5.2 have been posted on its website. Similarly, section 7.1 should require the Transmission Provider to formally notify Interested Parties when the Draft Transmission Plan has been posted on its website. It is noted that such notification of the Preliminary Set of Projects is required in section 6.4.</p>	<p>BC Hydro has revised these sections in Attachment K to include notification to Interested Parties.</p>

**ATTACHMENT K****Transmission Planning Process****1. Purpose and Description ~~and Purpose~~ of the Planning Process**

The purpose of this Attachment K is to support open and non-discriminatory access to the Transmission System. For greater certainty, Attachment K does not preclude further public and First Nations consultation in relation to planning, as appropriate or required.

This Attachment K describes a process to be followed for each of the Transmission Provider's three forms of transmission planning activities as set out below. Each transmission planning activity will include the generic planning elements described in this Attachment K as part of the broader planning requirements of the activity. Specifically, each planning activity will be initiated through notification to Interested Parties and will include the open and transparent development of the scope of transmission planning studies leading to the establishment of a set of Projects comprising the Transmission Plan. In its application, the planning process may vary depending on the needs and objectives of the specific transmission planning activity being undertaken. The Transmission Provider's planning activities may be mandated by provincial legislation or driven by corporate planning needs from year to year.

There are three forms of transmission planning activities that the Transmission Provider undertakes as required:

- (a) Long-term Planning: The first form of transmission planning occurs within the framework of the Transmission Provider's long-term planning. This activity provides a long-term plan relating to bulk Transmission System needs; i.e. typically those facilities at the highest voltage levels that are required to move energy over long distances. While focused at the bulk level, long-term planning considers a wide range of supply-side and demand-side options, resulting in an integrated system plan.

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- (b) Transmission Capital Planning: A second form of transmission planning is informed by the results of long-term planning and periodically assesses the Transmission System requirements over a shorter planning horizon. This transmission capital planning activity serves to identify the capital requirements necessary to fund Transmission System enhancements at all transmission voltage levels, as well as to meet the NERC transmission planning mandatory reliability standards as adopted in British Columbia by the BCUC.
- (c) Regional Planning: A third form of transmission planning includes consideration of other transmission owners that have an interest in transmission development undertaken within British Columbia. This is expected to take place through the framework of BCCPG and WECC. Within British Columbia, the BCCPG enables coordination, and where appropriate, integration of the transmission planning functions of its members. Outside of British Columbia, the BCCPG represents the interests of its members through participation in WECC planning groups, committees and subcommittees.

~~The Transmission Provider will ensure that any transmission planning it undertakes under this Attachment K meets FERC's nine transmission planning principles and will specify on its website how these principles will be addressed at the onset of each planning activity. The nine FERC transmission planning principles are: coordination, openness, transparency, information exchange, comparability, dispute resolution, regional coordination, economic planning studies, and cost allocation.~~

None of the three planning activities in Sections 1(a), (b), (c) guarantee Transmission Service. A Transmission Service request must be made separately by an Eligible Customer under the relevant provisions of the Tariff. This Attachment K does not place obligations on the Transmission Provider to construct upgrades or facilities identified in a study or in its Transmission Plan. This Attachment K supports, but does not replace the Transmission Provider's construction-related obligations in other portions of the Tariff. Point-to-Point Transmission Service, Network Integration Transmission Service and

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Interconnection Service requests are governed by and studied in accordance with other portions of the Tariff. Where possible, these study processes will be incorporated into the transmission planning activities described in this Attachment K.

## 2. Definitions

**BCCPG** means the British Columbia Coordinated Planning Group or successor organization.

**Economic Planning Studies** means studies undertaken by the Transmission Provider with respect of economic upgrades such as congestion reduction or the integration of new resources.

**FERC** means the United States Federal Energy Regulatory Commission.

**Interested Party** means any person ~~or group of persons that have expressed an interest in the Transmission Provider's transmission planning process so as to ensure comparable open access transmission service and limit the potential for undue discrimination~~affected by the planning process described in this Attachment K, such as a transmission customer, interconnection customer, or neighbouring transmission provider.

**NERC** means the North American Electric Reliability Corporation.

**Planning Manual** means the documentation produced and updated from time to time by the Transmission Provider that describes the basic methodology, criteria and assumptions used by the Transmission Provider.

**Point of Contact** means the contact designated by the Transmission Provider to whom all information and inquiries related to the planning activities described in this Attachment K should be directed.

**Project** means a capital project or concept for a capital project to expand the capability of the Transmission System to meet potential requirements and opportunities.

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**Tariff** means the Transmission Provider's Open Access Transmission Tariff.

**Transmission Plan** means the outline of one or more Projects that meet the needs identified in the study plan developed pursuant to Section 5 of this Attachment K.

**Transmission Planning Meeting** means a meeting to provide information and to solicit input from Interested Parties on the Transmission Provider's planning activities.

[WECC means the Western Electricity Coordinating Council.](#)

### 3. Information Exchange

Throughout each transmission planning activity undertaken by the Transmission Provider, the Transmission Provider will ensure that there are opportunities for information exchange between the Transmission Provider and Interested Parties. The opportunities provided for information exchange in a particular planning activity will be dependent on the nature of the specific planning activity being undertaken and will be determined by the Transmission Provider. The requirements and timelines for information exchange opportunities will be posted to the Transmission Provider's public website.

#### 3.1 Point of Contact

The Transmission Provider will designate a Point of Contact for each planning activity and will post the Point of Contact including contact details on the Transmission Provider's public website. [The Point of Contact will maintain a comprehensive mailing list of Interested Parties.](#) All information and inquiries related to the planning activities described in this Attachment K should be directed to the Point of Contact.

#### 3.2 Interested Party - Options for Providing Input

The Transmission Provider may use one or more of the ~~following~~ mechanisms [in section 3.2.1, 3.2.2 and 3.2.3](#) for obtaining input from Interested Parties in a transmission planning activity.

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**3.2.1 Written Comment Periods**

The Transmission Provider may establish a comment period through which it will take into account the written comments of Interested Parties with respect to a particular phase of a planning activity. The requirements and timelines for providing written comments to the Point of Contact will be made available through the Transmission Provider's public website.

**3.2.2 Transmission Planning Meetings**

The Transmission Provider may hold a Transmission Planning Meeting with Interested Parties with respect to a particular phase of a planning activity. The timing and agenda of any Transmission Planning Meeting will be made available through the Transmission Provider's public website.

**3.2.3 Focus Groups**

The Transmission Provider will engage focus groups where appropriate. Where focus groups are engaged, the Transmission Provider will post their terms of reference and schedule on the Transmission Provider's public website.

**3.2.43.3 Use of Feedback Received**

The Transmission provider will post input received from Interested Parties, or summaries of such input where appropriate, to its public website. The Transmission Provider will consider the input received from Interested Parties and may update the transmission planning documentation to reflect such input. Any such updates will be at the discretion of the Transmission Provider. The Transmission Provider will post the revised documents on its public website.

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**3.33.4 Guidelines for Submission of Planning Information**

The Transmission Provider will establish guidelines regarding the format, schedule and procedure for the submission of planning information to the Transmission Provider in accordance with Section 4 of this Attachment K. The guidelines will be posted on the Transmission Provider's public website and will address how and when customer planning information and requests for Economic Planning Studies are to be submitted and how Economic Planning Studies are to be evaluated.

**3.43.5 Availability of Planning Information**

Subject to the need to protect confidential or security sensitive information, the Transmission Provider will post on an ongoing basis the following on its public website:

- (a) the Transmission Provider's Planning Manual;
- (b) the Transmission Provider's current Transmission Plan;
- (c) the status of network upgrades for Projects in progress;
- (d) information received from Interested Parties throughout the course of the planning process; and,
- (e) planning information developed in the course of the planning process, including: circulated draft and final study and Transmission Plans, minutes of meetings and customer comments.

Subject to the need to protect confidential information or security sensitive information, the Transmission Provider may also post other information the Transmission Provider considers relevant to the planning process, including information received from advisory groups, regional planning groups, and local and regional studies.

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**3.53.6 Inquiries**

At any time, Interested Parties may direct inquiries related to the transmission planning process to the Point of Contact identified on the Transmission Provider's public website. The Point of Contact will respond to such inquiries as deemed appropriate by the Transmission Provider.

**4. Initiation of a Planning Activity**

The Transmission Provider will announce the initiation of a planning activity via electronic mail to Interested Parties and on its public website. The announcement will include:

- (a) a description of the planning activity being undertaken, including anticipated milestones and schedule;
- (b) instructions on how to access the Transmission Provider's planning information;
- (c) instructions on how to access the Transmission Provider's guidelines for providing planning information;
- (d) an outline of the anticipated opportunities that will be available to Interested Parties to provide input into the planning activity as contemplated in Section 3 of this Attachment K;
- (e) instructions on how to access the Transmission Provider's guidelines for making requests for Economic Planning Studies; and
- (f) the number of Economic Planning Studies that the Transmission Provider will undertake during the planning activity.

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**4.1 Submission of Planning Information**

In accordance with the guidelines established for the submission of planning information in Section 3 of this Attachment K, the Transmission Provider will receive planning information from Eligible Customers and Interested Parties as follows:

- (a) Interested ~~parties~~ Parties may submit written requests for Economic Planning Studies.
- (b) Network Customers shall provide updates to their long-term forecasts on Network Loads and Network Resources, Contingency Resource Plans and the other information contemplated by Section 31.6 and Attachment P of the Tariff.
- (c) Transmission Customers receiving Long-Term Firm Point-to-Point Transmission Service shall provide a 10-year projection of the need for and usage of Long-Term Firm Point-to-Point Transmission Service on the Transmission System including receipt and delivery points.
- (d) Interconnection Customers shall provide a 10-year forecast with respect to any planned additions or upgrades, including their status and expected In-Service Date, planned retirements and environmental restrictions.
- (e) Any Interested Party may also provide:
  - i. information related to non-wires solutions to offset or defer transmission investments, including targeted demand-side management and generation options; and
  - ii. any information on potential requirements or opportunities that the Interested Party believes should be considered in a particular planning activity.

If any Eligible Customer or Interested Party fails to provide data or otherwise participate as described in this Attachment K, then the Transmission Provider ~~shall not be obligated to~~

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~~consider the Eligible Customer's or Interested Party's requirements during the planning process and~~ may plan the Transmission System based on the ~~most recent data received~~information available.

## 5. Communication of the Scope of Transmission Plan Studies

### 5.1 Posting of Draft Scope of Transmission Plan Studies

Once a planning activity has been initiated as outlined in Section 4 of this Attachment K, the Transmission Provider will notify Interested Parties via electronic mail and make the following information available through its public website:

- (a) the expected start date and duration of the planning activity, and the tasks to be undertaken as part of the activity;
- (b) a high level review of the Transmission Provider's study methodology, data and Planning Manual;
- (c) a proposed list of studies that meet the Transmission Provider's needs and opportunities;
- (d) which, if any, requested Economic Planning Studies can be combined;
- (e) which Economic Planning Studies will be undertaken, and the appropriate planning activity for them to be undertaken;
- (f) a review of the Transmission Provider's coordination among the planning activities described in Section 1 of this Attachment K, including a description of those Economic Planning Studies that have been referred for consideration as part of a specific planning activity; and
- (g) an outline of the opportunities for Interested Parties to provide their input on the draft scope in accordance with Section 3 of this Attachment K.

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**5.2 Posting of Final Scope of Transmission Plan Studies**

The Transmission Provider will consider input provided by Interested Parties and may update the scope documentation relating to Transmission Plan [Studies](#). Once completed, the Transmission Provider will [notify Interested Parties via electronic mail and](#) post the final scope document to its public website.

**6 Completion of Studies**

Once the final scope document is completed, the Transmission Provider will complete the studies contemplated therein.

**6.1 Economic Planning Studies**

- (a) The Transmission Provider will conduct the selected Economic Planning Studies within its planning scope.
- (b) The Transmission Provider may request proponents of selected Economic Planning Studies and other Interested Parties to supply information that is reasonably necessary for the Transmission Provider to conduct the selected Economic Planning Studies. Such information may include cost information for transmission and generation facilities and forecasts of demand. Any information so provided will be considered not to be confidential unless it is claimed as such in accordance with Section 8 of this Attachment K. The Transmission Provider will have no obligation to proceed with an Economic Planning Study if the Transmission Provider does not receive the information reasonably necessary to conduct the Economic Planning Study.

**6.2 Use of Customer Planning Information**

Subject to confidentiality and security restrictions, any information received from Interested Parties may be used by the Transmission Provider without restriction in its planning activities described in this Attachment K and in the Transmission Provider's other

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planning activities or studies, such as studies in response to requests for Transmission Service or interconnection. However, if the Transmission Provider reasonably determines that any information provided under this Attachment K is inappropriate or unreasonable for a particular purpose, the Transmission Provider will not use it for such purpose.

The good faith projections of anticipated ~~point~~[Point](#)-to-~~point~~[Point](#) uses of the Transmission System or forecasted generation additions or upgrades provided by customers are additional data for consideration by the Transmission Provider in its planning activities. The Transmission Provider may consider such projections, for example, to support likely scenarios for new investments. The projections, however, will not be treated as a substitute for actual Point-To-Point reservations or interconnection requests.

### **6.3 Preliminary Set of Projects**

After the completion of the studies, the Transmission Provider will post the following on its public website:

- (a) study results; and~~;~~
- (b) a preliminary set of Projects.

### **6.4 Notice of Preliminary Set of Projects**

The Transmission Provider will inform Interested Parties through electronic mail and its public website that a preliminary set of Projects has been developed and posted and will outline the opportunities for Interested Parties to provide input in accordance with Section 3 of this Attachment K.

## **7. Transmission Plan Development**

### **7.1 Draft Transmission Plan**

After considering input received from Interested Parties regarding the preliminary set of Projects, the Transmission Provider will develop and ~~post on its public website a~~[notify](#)

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[Interested Parties via electronic mail that the](#) draft Transmission Plan [has been posted on its public website](#). The draft Transmission Plan will include the following:

- (a) Projects that [have been selected to](#) meet the ~~needs identified in Section 5 of this Attachment K~~ [Transmission Provider's needs and opportunities](#);
- (b) Projects that are in progress;
- (c) Projects that meet the requirements of Transmission Service and Interconnection Service requests;
- (d) Projects that have been developed sufficiently for the Transmission Provider to seek approval from its Board of Directors; and
- (e) Projects for which no approval will be sought in the current planning cycle.

The Transmission Provider will outline what opportunities will be available to Interested Parties for providing input on the draft Transmission Plan in accordance with Section 3 of this Attachment K.

**7.2 Final Transmission Plan**

The Transmission Provider will consider input received from Interested Parties and may update the Transmission Plan as appropriate. Once completed, the Transmission Provider will post the final Transmission Plan to its public website. This will be the final step of a transmission planning activity. The inclusion of a Project in its Transmission Plan does not mean that a decision has been made by the Transmission Provider to proceed with the project.

**8. Confidentiality**

The Transmission Provider will develop guidelines with respect to how it will receive, use and disclose confidential and security sensitive information, including specifying how ~~customers~~ [Interested Parties](#) may submit information on a confidential basis and how a

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party seeking access to such information can request access to it. These guidelines will be posted on the Transmission Provider's public website.

## 9. Inter-Regional and Regional Planning

The Transmission Provider will coordinate with interconnected systems through ~~its~~ participation in ~~WECC, the BCCPG, other~~ sub-regional planning groups and through direct engagement ~~of~~with neighbouring systems, as appropriate.

### 9.1 WECC Inter-Regional Planning

As a member of WECC, the Transmission Provider will follow WECC's policies and procedures for inter-regional planning and will participate in WECC's planning activities as it deems appropriate. The Transmission Provider will post current links to WECC's procedures and guidelines on its public website as well as information detailing the Transmission Provider's participation in WECC's planning processes.

### 9.2 BCCPG Regional Planning

As a member of BCCPG, the Transmission Provider will follow BCCPG's policies and procedures for British Columbia regional planning and will participate in BCCPG's planning activities as it deems appropriate. The Transmission Provider will post current links to BCCPG's procedures and guidelines on its public website as well as information detailing the Transmission Provider's participation in BCCPG's planning processes.

### 9.3 Participation in Inter-Regional and Regional Planning

Interested Parties who are interested in any regional planning activities may contact the Transmission Provider's Point of Contact to obtain information with respect to opportunities for participation in these forums.

## 10 Dispute Resolution Process

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The dispute resolution procedures described in Section 12 of the Tariff are not applicable to disputes arising from the transmission planning process described in this Attachment K. Interested Parties ~~are encouraged to~~may bring to the attention of the Point of Contact any ~~issues~~issue arising ~~during~~from the planning activities outlined in this Attachment K and the Transmission Provider will work with Interested Parties to attempt to resolve the issue. Interested Parties may also file a complaint with the BCUC with respect to any such issue.

**11. Cost Allocation**

The Transmission Provider will recover the costs of projects required for meeting service requests and system improvements in accordance with the provisions of the Tariff.

The Transmission Provider is not obligated to expand the Transmission System based on the results of Economic Planning Studies. Where the Transmission Provider decides to construct facilities based on the results of one or more Economic Planning Studies, it will do so in accordance with any transmission expansion, congestion or other similar policy developed by the Transmission Provider and in effect at that time, subject to BCUC approval. In these cases, the Transmission Provider will apply the cost allocation principles of the applicable policy under which the project is developed, subject to BCUC approval.

**12. No Participant Funding**

Interested Parties may participate in the activities associated with the transmission planning process described herein at their own cost.

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