

# STANDING OFFER PROGRAM REVIEW ENGAGEMENT GUIDE

**APRIL 2014** 

**BChydro C**FOR GENERATIONS

### **ABOUT BC HYDRO**

## BC HYDRO IS ONE OF CANADA'S LARGEST ELECTRIC UTILITIES, SERVING 95 PER CENT OF B.C.'S POPULATION

BC Hydro is a crown-owned utility that supplies, purchases and delivers power to 95 per cent of B.C.'s population.
BC Hydro operates 31 hydroelectric facilities and three thermal generation plants that use natural gas. In addition, BC Hydro has been purchasing power from Independent Power Producers for over 20 years. More than 80 Independent Power Producers are delivering electricity to BC Hydro's grid and make up 20 per cent of the total domestic electricity supply.

BC Hydro's mandate is to provide British Columbians with reliable and affordable electricity. As a crown-owned utility,

BC Hydro is required to support Provincial energy objectives as defined in the *Clean Energy Act*, including to:

- Generate at least 93% of the electricity in British Columbia from clean or renewable resources.
- Keep rates among the most competitive in North America.
- Use renewable power to help achieve provincial greenhouse gas reduction targets.
- Foster the development of First Nations and rural communities through the use and development of clean or renewable resources.

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### WHAT IS THE STANDING OFFER PROGRAM?

THE PROGRAM ENCOURAGES THE DEVELOPMENT OF SMALL AND CLEAN OR RENEWABLE ENERGY PROJECTS THROUGHOUT THE PROVINCE

The Standing Offer Program (the "SOP") is a province-wide, non-competitive program that allows BC Hydro to buy power from developers with small, clean energy projects for a pre-set price. To accommodate smaller developers, the process is streamlined with a simplified contract and decreased transaction costs.

- Projects must be less than 15 megawatts (MW) in size.
- The target amount of electricity acquired by BC Hydro under the SOP is 150 gigawatt hours per year (GWh/year).
- Projects must deliver clean or renewable energy as defined by the Clean Energy Act.

The SOP Rules ("the Rules") explain the current SOP eligibility requirements, the payment price offered and the application process. These Rules and additional information can be found at www.bchydro.com/standingoffer.

#### **SOP QUICK FACTS**

- As of March 2014, 13 SOP projects have Electricity Purchase Agreements (EPAs) with BC Hydro; of these, 10 projects have been built and are delivering 217 GWh/year.
- Currently, 8 SOP applications are being reviewed.
   If these projects meet all the criteria and receive an EPA, BC Hydro will have an additional 380
   GWh of annual energy coming online over the next four years.



## WHY ARE WE DOING A REVIEW?

## BC HYDRO IS COMMITTED TO MEETING THE OBJECTIVES OF THE SOP AND IMPLEMENTING PROGRAM IMPROVEMENTS

Every few years BC Hydro conducts a review of the SOP to determine if the program is meeting its objectives to support small, clean energy projects and to make improvements or other modifications.

The previous review took place in 2010 and the revised Program was launched on January 25, 2011.

In this round of review of the SOP, BC Hydro will be guided by the following principles:

- to align electricity purchases with the electricity requirements of BC Hydro customers,
- to strike a balance between supporting the clean energy sector and acquiring cost-effective energy for BC Hydro customers, and



 to support economic development of First Nations communities by promoting First Nations participation in the SOP.

#### BC HYDRO'S CLEAN ENERGY STRATEGY

RESPONDING TO FIRST NATIONS AND STAKEHOLDER FEEDBACK

In consulting on BC Hydro's long-term Integrated Resource Plan to meet future electricity demand, BC Hydro received feedback from First Nations and stakeholders seeking greater opportunity in clean energy development. In response to this input, BC Hydro developed a Clean Energy Strategy to support the clean energy sector and promote clean energy opportunities for First Nations.

The Clean Energy Strategy advances a number of actions, some of which include:

- increasing the SOP's annual target volume of energy from 50 GWh/year to 150 GWh/year,
- increasing the maximum project size under the Net Metering Program from 50 kW to 100 kW,
- introducing a Micro-SOP component within the overall SOP annual target to enable projects sized above 100 kW and up to 1 MW,
- engaging with First Nations and Independent Power Producers on how to introduce new elements to the SOP to promote First Nations participation, and
- as the need for the next major call for power emerges, engaging First Nations and the clean energy sector on how to promote First Nations participation in a new call for power.

# ALIGNING THE SOP WITH THE ELECTRICITY REQUIREMENTS OF BC HYDRO CUSTOMERS

In planning to meet future demand, BC Hydro assesses how much electricity it can produce and rely upon from its current generating facilities, its contracts with Independent Power Producers, and its current conservation plan.

BC Hydro's recently approved long-term Integrated Resource Plan recommended several actions to ensure BC Hydro customers continue to receive low-cost, reliable electricity. These actions included pursuing conservation and efficiency measures, managing the existing portfolio of Independent Power Producer resources, advancing Site C and supporting the clean energy sector.

The Energy Supply Demand Outlook graph below shows how the approved Integrated Resource Plan actions, including the 150 gigawatt hour per year SOP target, contributes to a forecasted positive energy balance.

## ELECTRICITY FOR THE LIQUEFIED NATURAL GAS INDUSTRY

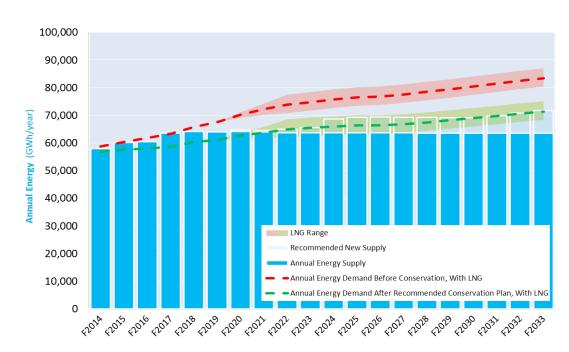
BC Hydro has sufficient supply to meet the initial 3,000 GWh/year of liquefied natural gas (LNG) load and is preparing to meet further LNG requirements as they emerge.

BC Hydro understands that while most LNG producers will use direct-drive natural gas turbines to run the cooling process to convert natural gas to liquid form, some are expected to use electricity for ancillary requirements such as lighting, control systems and office requirements. Others may choose electricity for all their energy needs.

As the LNG industry develops, BC Hydro will continue to support the needs of this sector.

### ENERGY SUPPLY-DEMAND OUTLOOK

Energy is the amount of electricity that can be produced or used over a period of time measured in gigawatt-hours (one GWh = one million kilowatt hours).



Fiscal Year (year ending March 31)

## WHAT IS INCLUDED IN THE REVIEW?

#### RESPONDING TO FIRST NATIONS AND STAKEHOLDER FEEDBACK

Starting in December 2013, BC Hydro began an internal assessment of the program based on feedback received through proponent comments, letters, First Nations and stakeholder input into the Integrated Resource Planning process, and First Nations and stakeholder on specific SOP projects.

The feedback from all these avenues informed the items BC Hydro is examining in this review. BC Hydro is unable to change some of the issues identified at this time. Other issues are in the process of being changed. Several of these issues are engagement topics included in this guide:

- 1. increasing certainty for SOP applicants,
- 2. modifications to the SOP Rules,

- 3. examining the project cluster rule, and
- 4. promoting First Nations participation.

A list of issues that BC Hydro is examining as part of this review can be found on page 15.



#### OTHER OPPORTUNITIES FOR SMALL DEVELOPERS

#### **NET METERING**

BC Hydro's Net Metering Program is designed for residential and commercial customers who wish to connect a small electricity generating unit to the BC Hydro distribution system.

- For projects sized up to 100 kW.
- BC Hydro currently has an application with the British Columbia Utilities Commission to raise the maximum allowable project size from 50 kW to 100 kW.
- Once this application is approved, BC Hydro
  will be communicating the change on our
  website and to our list of interested stakeholders.
  To learn more or to join this list, please visit us at
  www.bchydro.com/netmetering.

#### **MICRO-SOP**

BC Hydro's Micro-SOP will be designed for customers or small developers that are too small for the SOP but too large to apply for the Net Metering Program.

- For projects sized above 100 kW and up to 1 MW.
- Is currently under development and is expected to be launched by summer 2014.
- To get involved in the Micro-SOP design, please email us at standing.offer@bchydro.com.

## SOP REVIEW MEETING SCHEDULE

## FIRST NATIONS AND STAKEHOLDER MEETINGS WILL BE HELD ACROSS THE PROVINCE IN EARLY APRIL 2014

BC Hydro wants to hear from you as the SOP is reviewed and updated. To attend a First Nations or stakeholder meeting, please register online at www.bchydro.com/standingoffer.

If you are unable to attend a meeting, please visit us at www.bchydro.com/standingoffer to review engagement materials, fill out a feedback form, and view updates on the review process.

Community	Date	Time		Location
Terrace	Tuesday, April 1	First Nations Meeting	9:30 – 11:30 a.m.	Best Western Inn
		Stakeholder Meeting	1:00 – 3:30 p.m.	4553 Greig Avenue
Kamloops	Thursday, April 3	First Nations Meeting	9:30 – 11:30 a.m.	Ramada Inn
		Stakeholder Meeting	1:00 – 3:30 p.m.	555 Columbia Street West
Nanaimo	Monday, April 7	First Nations Meeting	9:30 – 11:30 a.m.	Vancouver Island Conference Centre
		Stakeholder Meeting	1:00 – 3:30 p.m.	101 Gordon Street
Vancouver	Tuesday, April 8	First Nations Meeting	9:30 – 11:30 a.m.	The Westin Grand
		Stakeholder Meeting	1:00 – 3:30 p.m.	433 Robson Street
Prince George	Friday, April 11	First Nations Meeting	9:30 – 11:30 a.m.	Sandman Signature
		Stakeholder Meeting	1:00 – 3:30 p.m.	2990 Recplace Drive

BC Hydro will be hosting regional meetings for First Nations and stakeholders in April, followed by more informal discussions in June for those interested in further understanding the potential changes to the program. Feedback from this engagement will be considered as BC Hydro drafts the revised SOP which is targeted to be released in fall 2014.

If you are interested in further discussions on the SOP review, please email us at standing.offer@bchydro.com.

# ENGAGEMENT TOPIC: INCREASING CERTAINTY FOR SOP APPLICANTS

In response to feedback from First Nations, stakeholders and government, BC Hydro is examining ways to increase certainty and provide more timely information for project developers in the SOP.

#### MANAGING THE 150 GIGAWATT HOUR PER YEAR TARGET

In response to feedback, BC Hydro has increased the target for the SOP from 50 to 150 GWh/year. BC Hydro will be treating this as a "soft" target. In some years BC Hydro may acquire slightly more than the target while in other years BC Hydro may acquire slightly less than the target. BC Hydro is creating high-level principles that will guide how we manage the annual incremental volume of energy commitments under the SOP.

These principles may include:

- consistency and transparency in the process,
- fairness (e.g., first come, first served approach or some other criteria),
- opportunities spread across multiple developers rather than just one or two developers using the full volume,
- geographically diverse projects,

- queue position not transferable,
- simplified process; minimal change to SOP process/rules, and
- if the full volume is not used one year, the remaining quota will not be carried forward to the next year.

Please share your thoughts on this set of principles, including which principles are a priority, on page 2 of the Feedback Form.

#### MANDATORY PRE-APPLICATION MEETING

BC Hydro is considering making the pre-application meeting mandatory for all developers wishing to submit an application to the Program. The pre-application meeting is currently optional.

The purpose of a mandatory pre-application meeting would be to respond to a project developer's questions about the SOP as well as for BC Hydro to request and review high-level project information. This exchange of information would allow BC Hydro to do a 'pre-assessment' of the project's eligibility in advance of major expenditures by the developer.

Information required could include:

- project description,
- number of projects,
- location (latitude and longitude),
- anticipated size of each project,
- generation technology/fuel,
- status of permits,

- First Nations participation,
- identification of potentially impacted First Nations and status of First Nations consultation,
- potential point of interconnection, and
- target commercial operation date (COD).

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#### MANDATORY PRE-APPLICATION MEETING ... CONTINUED

#### CONSIDERATIONS

A pre-assessment could give project developers a good indication, based on project information, of whether their SOP application would likely be accepted by BC Hydro, and therefore awarded an EPA.

A pre-assessment could help project developers avoid investing money in projects that are not feasible due to the large scope of network upgrades required to support the project type or size.

A pre-assessment could give projects developers an early indication of whether BC Hydro would exercise its discretion (for example with respect to the project clusters rule or delay of target COD) with respect to their projects.

A pre-assessment could give developers a clearer indication of what their likely target COD might be (with respect to the 150 GWh/year target).

BC Hydro is seeking input on making the pre-application meeting mandatory. Please share your feedback on **page 3 of the Feedback Form**.

#### COMMERCIAL OPERATION DATE (COD) DEFERRAL

Currently under the SOP, the Rules permit BC Hydro to defer a project's COD by one year *before* the EPA is offered and then further discretion to defer a project's COD by one year *after* the EPA is offered (Buyer Target COD Deferral section 3.11 of the EPA).

BC Hydro is considering removing the section from the EPA that allows BC Hydro to defer a project's COD after an EPA is offered, in an effort to increase developer certainty. However, BC Hydro will retain the discretion in the SOP Rules to reschedule a project's COD by up to three years *prior to offering* an EPA. Deferral of the target COD up to three years in advance of offering an EPA will allow BC Hydro the ability to work with developers early in the process to find a COD.

This discretion enables BC Hydro to more effectively manage the target energy volume for the Program of 150 GWh/year. BC Hydro would regularly publish the annual volume of expected energy from the SOP, to inform project developers of the status of the annual target.

#### **CONSIDERATIONS**

No deferrals after the EPA is offered should give project developers more certainty of their COD. Three years may be an unacceptable length of time to delay CODs for some developers.

BC Hydro would consider reimbursing developers for certain costs if BC Hydro requests to delay the target COD. For example, BC Hydro would cover the cost of interconnection re-studies.

Please comment on how BC Hydro discretion to reschedule or defer target CODs could affect your project on **page 3 of the Feedback Form**.

## ENGAGEMENT TOPIC: MODIFICATIONS TO THE SOP RULES

#### **REGIONAL PRICING**

BC Hydro currently adjusts the price paid to SOP proponents based on the location of the project to reflect transmission infrastructure costs and the impact of electricity losses as the generated electricity is moved throughout the province to load centres. These load centres are distributed throughout the province. Currently the main load centre is located in the Lower Mainland.

In response to feedback, BC Hydro is considering removing the regional pricing structure and creating a single 'postage-stamp' rate that would be based on an average of the current SOP prices, and which would be the same for all projects across the province.

#### **Current Regional Pricing Schedule**

(2014\$/MWh)

• Vancouver Island: \$106.91

• Lower Mainland: \$108.42

Kelly/Nicola: \$101.44

• Central Interior: \$103.78

• Peace Region: \$99.18

• North Coast: \$100.55

• South Interior: \$103.49

• East Kootenay: \$106.84

#### **Example of Potential Postage-Stamp Rate**

(2014\$/MWh)

• \$103.83

#### **CONSIDERATIONS**

A 'postage-stamp' rate may be seen as more fair to developers than regional pricing as a project in any location in B.C. is paid the same price. However, proponents located in the Lower Mainland, East Kootenays and Vancouver Island would receive a lower rate than they currently do under the regional pricing structure.

BC Hydro may not be minimizing the overall cost of energy acquisitions for the ratepayers as energy acquired in some regions may be more expensive than others due to higher transmission-related costs.

Transmission-related costs will be updated from time to time to reflect new information. These updates could increase or decrease the relative regional prices either positively or negatively. Transmission-related costs would also impact a single 'postage-stamp' rate.

Please share your feedback on BC Hydro removing the regional pricing structure and creating a single 'postage-stamp' rate on page 4 of the Feedback Form.

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#### **NETWORK UPGRADES**

Developers and First Nations have identified that one of the most expensive and uncertain parts of the SOP are the network upgrade costs. In some locations across the province, BC Hydro does not have adequate infrastructure which may lead to prohibitively high interconnection costs making a project unviable. BC Hydro is considering how to address developers' concerns regarding network upgrade costs.

Currently BC Hydro will contribute up to \$150 per kilowatt of project capacity towards network upgrades with the rest of the cost borne by the developer, including the costs of all interconnections studies.

BC Hydro, in collaboration with the Provincial government, could explore the opportunity to allocate money under the First Nations Clean Energy Business Fund to assist with network upgrade costs. Therefore, these funds may not be available for other uses, e.g., feasibility studies. BC Hydro could also explore with the Federal government the opportunity to use national funding sources to assist with network upgrade costs.

#### **EXISTING FUNDING SOURCES**

- ecoENERGY for Aboriginal and Northern Communities Program supports the adoption of renewable energy.
- Aboriginal Business Development Program works with Aboriginal entrepreneurs to provide a range of services, supports and funding.
- First Nation Regeneration Fund seeks to regenerate Aboriginal economies by financing Aboriginal equity stakes in run-of-river power projects.
- First Nations Clean Energy Business Fund promotes increased First Nation participation in the clean energy sector.

Please provide suggestions for how BC Hydro could improve the interconnections process to create greater certainty around network upgrade costs for proponents on page 5 of the Feedback Form.

#### PROJECTS WITHIN THE FORTISBC SERVICE AREA

BC Hydro is considering disallowing projects within the FortisBC service area from being eligible for the SOP unless they are able to connect directly to the BC Hydro system. Currently projects in the FortisBC area are allowed to apply to the SOP and 'wheel' their electricity through the FortisBC system. This creates significant complexity in developing and managing the EPAs and it contradicts the premise of the SOP as a simple, straightforward process to acquire cost-effective energy. Therefore, BC Hydro is considering removing projects within the FortisBC service area from being eligible for the SOP.

#### **CONSIDERATIONS**

Projects within the FortisBC service area complicate the administration and contract management thereby increasing costs, resources and time for BC Hydro.

If projects within the FortisBC service area are not allowed into the SOP, this is no longer a province-wide program.

Projects within the FortisBC service area may have to spend more money to connect directly to the BC Hydro system via a private line.

Please indicate whether disallowing projects in the FortisBC service area into the SOP unless they are able to connect directly to the BC Hydro system could affect your project(s) on **page 6 of the Feedback Form**.

## ENGAGEMENT TOPIC: EXAMINING THE CLUSTER RULE

BC Hydro intends to maintain the project cluster rule (rule 2.6) as it serves to uphold the intent of the SOP, which is to enable several new small, standalone clean energy projects in B.C. The rule allows BC Hydro to prevent a large project from being split into smaller projects in an attempt to be eligible for the SOP. The rule also ensures there is room for many developers to participate in the SOP, versus one developer with a cluster of projects consuming the SOP target volume for years at a time. Evidence of a project cluster includes common ownership and shared tenures, permits, facilities, shared fuel source or other infrastructure such as roads, interconnection facilities, power lines or point of interconnection.

BC Hydro currently has the discretion to allow certain clusters of projects in exceptional cases if the projects benefit BC Hydro, the ratepayer or the Province. In an effort

## BC Hydro has been contacted regarding the following potential project clusters:

Region	Number of Clusters	Sum of Potential Projects Capacity	Potential Energy Volume*
North West	1	72 MW	221 GWh/yr
North East	2	75 MW	230 GWh/yr
South Coast	5	300 MW	920 GWh/yr
Southern Interior	2	80 MW	245 GWh/yr

<sup>\*</sup>Assuming 35% project capacity factor.

to increase transparency and give developers greater certainty, BC Hydro will include, in the SOP Rules, examples of when project clusters would be allowed. Examples may include avoiding undue environmental effects, improving system reliability, and/or meeting other BC Hydro goals.

#### **CONSIDERATIONS**

Currently, BC Hydro is aware of close to a dozen potential clusters of projects in different regions of the province. The sum of the capacity of these potential projects could be over 500 MW, which, assuming a 35% average capacity factor for all projects, would be over 1,500 GWh/year in energy.

The cluster rule assists BC Hydro in managing the SOP volumes, and ensuring opportunities for economic development are spread across developers and communities. Without the cluster rule the SOP target of 150 GWh/year would be taken up by cluster projects with no room for other projects.

Some developers may have projects that are only economically viable if they are allowed to build a cluster of projects due to inadequate infrastructure.

Project clusters can offer significant efficiencies in infrastructure and interconnections. Therefore a cluster could decrease the overall environmental footprint. BC Hydro is interested in gaining a better understanding of the circumstances where a cluster could demonstrate a broader benefit.

BC Hydro expects that it would exercise discretion under the cluster rule in exceptional circumstances only. Please comment on what BC Hydro should consider in evaluating whether to exempt a project from the cluster rule on page 6 of the Feedback Form.

## ENGAGEMENT TOPIC: PROMOTING FIRST NATIONS PARTICIPATION

Feedback received through proponent comments, letters, First Nations and stakeholder input into the Integrated Resource Planning process, and First Nations and stakeholder input received on specific SOP projects indicates a desire for increased First Nations participation in the clean energy sector. In response to this feedback, BC Hydro is engaging on how to promote First Nations participation in its power acquisitions processes, and specifically in the SOP.

A range of mechanisms could be employed to encourage greater First Nations participation in the SOP. However, not all mechanisms may be endorsed by all First Nations and developers. To promote First Nations participation, BC Hydro is considering including First Nations participation as eligibility criteria within the SOP Rules. This eligibility criteria could follow either a flexible approach that requires a First Nations letter of support or Band Council resolution, or a prescriptive approach requiring one or more participation models. BC Hydro is aware of a range of participation models that exist.

#### Some examples could include:

- a joint venture between a First Nation and a developer,
- First Nations equity stake in a project,
- royalties paid to First Nations by developers,
- asset transfer from the developer to a First Nation,
- a revenue-sharing agreement between First Nations and a developer,
- an education, training or employment agreement between First Nations and a developer, and
- other arrangements.

#### **CONSIDERATIONS** Identifying specific eligibility Requiring some of these BC Hydro would need to Requiring a prescriptive parameters may be too participation models may reallocate resources to First Nations participation restrictive to promote the impose additional monitor the level of model provides guidance participation of different commercial costs on and clarity to developers First Nations participation in First Nations in different developers, which could a project beyond the initial and First Nations. circumstances. BC Hydro make their projects assessment at the time of does not want to restrict unviable. EPA signing. innovative business transactions that work for First Nations and developers.

Please share your thoughts on BC Hydro requiring a minimum amount of First Nations participation as an eligibility criterion for the SOP on pages 7 and 8 of the Feedback Form.

## PROMOTING FIRST NATIONS PARTICIPATION

... CONTINUED

#### PRICE ADJUSTMENTS FOR FIRST NATIONS PARTICIPATION

BC Hydro recognizes that other jurisdictions have provided a price adder to encourage First Nations participation. A price adder is a monetary incentive added to the price paid for electricity if the project meets a minimum level of First Nations participation. BC Hydro is concerned about the effect of a price adder on BC Hydro rates and, therefore, may consider using a negative price adjustment if a project does not have a certain level of First Nations participation.

#### **CONSIDERATIONS**

A negative price adjustment may promote increased First Nations participation without impacting BC Hydro rates.

A decrease in price for those projects without First Nations participation may mean that some projects are no longer economically viable.

Customer-driven projects confined to existing business premises or industrial sites may be exempted from price adjustments as they may not lend themselves to First Nations participation.

Please provide your feedback on a negative price adjustment for projects that do not include First Nations participation on page 7 of the Feedback Form.

#### PROMOTING FIRST NATIONS PARTICIPATION IN POTENTIAL FUTURE CALLS FOR POWER

The SOP is an immediate and ongoing opportunity for First Nations and other clean energy developers to develop small, clean energy projects. Currently BC Hydro has a positive energy balance and does not have immediate plans to undertake another larger call for power.

However, BC Hydro's Integrated Resource Plan includes a Clean Energy Strategy to ensure we are ready to respond to the future electricity need when it arises. Part of the strategy involves engaging with First Nations and stakeholders on how to promote First Nations participation in future calls for power as the need for a call emerges. Rather than wait, BC Hydro is looking for input now on how First Nations can participate in future power calls.

Please provide comments on First Nations participation in future power calls on page 9 of the Feedback Form.

# OTHER SOP ITEMS INCLUDED IN THE REVIEW: FOR REFERENCE

	ISSUE	PROPOSED CHANGE
ELIGIBILITY	<b>Maximum Project Size:</b> First Nations and other developers have requested that BC Hydro increase the SOP maximum project size.	<b>No change</b> as the maximum size is legislated at 15 MW, and helps manage volume while BC Hydro is in a positive energy balance.
ELIGII	<b>Previous, Current, Future EPAs:</b> Developers view the 5-year "blackout period" to apply to SOP after a terminated EPA as being too long.	<b>No change</b> helps manage volume while BC Hydro is in a positive energy balance.
PRICE	<b>Base Price Issues:</b> Price too low according to developers; price too high relative to current long run marginal cost of new supply; pricing should be technology- or fuel-specific.	<b>No change</b> as BC Hydro is in a positive energy balance. BC Hydro is technology/fuel neutral as long as it is clean or renewable.
PR	<b>Energy Delivery:</b> Some Independent Power Producers may generate more energy than the maximum 15 MW nameplate capacity.	To ensure BC Hydro does not purchase energy above the legislated maximum, we will set hourly delivery caps and pay \$0 for energy delivered over 15 MW.
EPA	<b>EPA Term:</b> Should minimum EPA term be less than 20 years?	Maintain minimum 20-year term for greenfield projects; allow a minimum 10-year term for customerbased generation.
	<b>Auxiliary Fuel:</b> Clarify Auxiliary Fuel definition and associated EPA terms.	Update Auxiliary Fuel definition and EPA language.
	<b>EPA Section 10.7:</b> Standard or Distribution Generator Interconnection Agreement has replaced Facilities Agreement and Interconnection Agreement.	Replace references and update EPA language.
	<b>EPA Appendix 3:</b> Inconsistency between SOP EPA and Interconnection Agreement on when network upgrade security is due.	Change language to indicate that network upgrade security timing is per the Interconnection Agreement.
RULES	<b>Conflict of Interest:</b> Add language in SOP Rules that states that BC Hydro needs to be aware of any conflicts or potential conflicts of interest before the EPA is executed.	BC Hydro will draft and add language.
	Rule 2.8: Wording "participate in the SOP" is confusing.	Change to "submit an application to the SOP".
	<b>Rule 2.15:</b> Wording is not explicit: "BC Hydro will be assessing the adequacy of First Nations consultation"	BC Hydro will reword.
	Rule 5.2: Distribution interconnection study terms outdated.	Update interconnection study terms.
	<b>Rule 5.12:</b> Revenue metering is now addressed through the interconnections process.	Replace reference/contact information for Revenue Metering with Interconnections.
ATION	<b>Paper-Intensive Process:</b> BC Hydro requests that several documents be submitted in hard copy, i.e., paper.	Determine what aspects of the SOP Application and associated review can be paperless.
APPLICATION	<b>Section 3 - Permits, Site Control and Zoning:</b> List of relevant permitting/site control/zoning requirements may be outdated.	Update the permitting/site control/zoning requirement list.

This is for information only and is not binding on BC Hydro. If there is any conflict between this document and the SOP Rules, as there may be from time to time, the SOP Rules prevail.

For more information about BC Hydro's Standing Offer Program, please go to: www.bchydro.com/standingoffer

### **BC** Hydro

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bchydro.com

