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Via email: Project No. 1598978 Application for Reliability Coordinator (RC) Registration with the Mandatory Reliability Standards (MRS) Program Registered Interveners B.C. MRS Program Registered Entities

March 1, 2019

**RE: Project No. 1598978
British Columbia Utilities Commission (BCUC or Commission)
British Columbia Hydro and Power Authority (BC Hydro)
Application for Reliability Coordinator (RC) Registration with the
Mandatory Reliability Standards (MRS) Program
Draft Documents for Stakeholder Process**

BC Hydro writes to provide all Registered Entities in the BC MRS Program and registered interveners in the above referenced proceeding with certain draft documents related to BC Hydro's proposed performance of the Reliability Coordinator (**RC**) role in B.C., as described below.

Pursuant to BCUC Order No. G-32-19, BC Hydro was directed to provide a draft of certain documents identified as:

- (a) An RC code of conduct that BC Hydro would follow if it is registered as the RC;
- (b) The terms of reference for the RC registered Entities oversight group referred in BC Hydro's response to BCUC Information Request (**IR**) No. 1;
- (c) The terms of reference for the RC, Balancing Authority, Transmission Operator working group referred in BC Hydro's response to BCUC IR No. 1; and
- (d) A document setting out a dispute resolution mechanism to be applied in the event of a dispute between the registered Entities in relation to the carrying out of the RC function.

BC Hydro has developed the above-referenced documents and provides a draft of each as attachments to this letter, as follows:

- 1. BC Hydro Reliability Coordinator Standards of Conduct (**Attachment 1**);
- 2. Terms of Reference for the British Columbia Reliability Coordinator Registered Entities Oversight Group (**Attachment 2**); and
- 3. Terms of Reference for Balancing Authority/Transmission Operator Operations Working Group (**Attachment 3**).

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Program Registered Interveners

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BC Hydro has not provided a separate stand-alone dispute resolution document, but rather, and as discussed at the procedural conference, has incorporated a dispute resolution mechanism in Attachment 2 which provides for a process to resolve disputes with respect to matters within the scope of responsibilities of the registered entities oversight group.

To ensure that Registered Entities and Interveners have sufficient time to review and provide feedback on the draft documents, BC Hydro is recommending the following consultation process and dates for review:

Activity	Date
BC Hydro provides draft documents	March 1, 2019
Registered Entities and Intervener Comments and revisions on draft documents to BC Hydro	March 12, 2019
Conference Call to discuss comments and provide feedback on draft documents	March 14, 2019
BC Hydro provides revised version of draft documents to Registered Entities and Interveners for review and comment	April 1, 2019
Conference call to discuss revisions and final comments from Registered Entities and Interveners	April 5, 2019
BC Hydro provides final version of documents to Registered Entities and Interveners	April 10, 2019

BC Hydro encourages all parties to provide written comments on the draft documents to the attention of bhydroreliabilitycoordination@bchydro.com. BC Hydro proposes to host the conference calls on March 14, 2019 and April 5, 2019 at 10:00 a.m. and asks that all participants interested in participating in the conference calls RSVP with the names and number of people attending two days in advance (i.e., by March 12, 2019 and April 3, 2019) to the following email address: bhydroreliabilitycoordination@bchydro.com. BC Hydro will provide call-in details to all parties who RSVP'd one day before the scheduled call.

Yours sincerely,



Asher Steed
Manager Provincial Reliability Coordination Operations

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Enclosure

**Application for Reliability Coordinator (RC)
Registration with the Mandatory Reliability
Standards (MRS) Program**

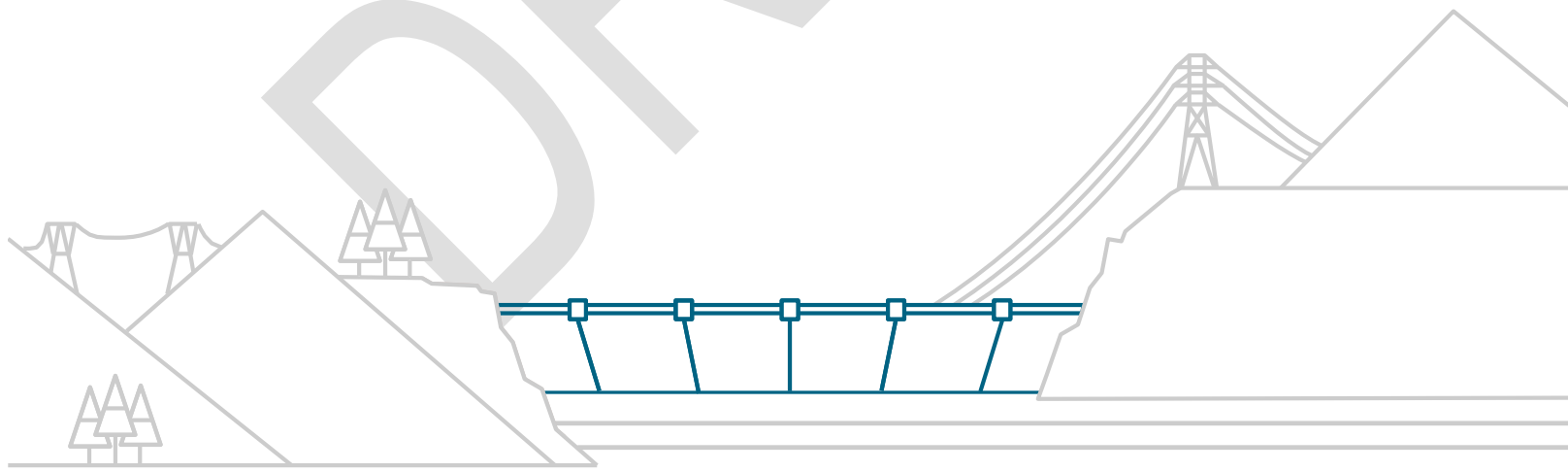
Attachment 1

**BC Hydro Reliability Coordinator
Standards of Conduct**

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Reliability Coordinator Standards of Conduct

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Introduction

British Columbia Hydro and Power Authority (“BC Hydro”) as Reliability Coordinator (the “RELIABILITY COORDINATOR”) must treat all users of the interconnected transmission systems in a fair and non-discriminatory manner. BC Hydro as RELIABILITY COORDINATOR will conduct its affairs in conformance with the following standards:

1. General rule

1.1. Independence

Except as provided in paragraph 1.3 of this section, the RELIABILITY COORDINATOR, its employees, or the employees of any of its affiliates who perform RELIABILITY COORDINATOR functions (“RELIABILITY COORDINATOR employees”) must operate independently of employees/persons who actively and personally engage on a day-to-day basis in the sale for resale, or the submission of offers to sell, of electric energy or capacity, demand response, virtual transactions, or financial or physical transmission rights, all as subject to an exclusion for bundled retail sales (“Marketing function employees”). “Operate independently” does not mean or require corporate separation of the RELIABILITY COORDINATOR from the Transmission Provider or Marketing function employees or functions.

1.2. Priority

RELIABILITY COORDINATOR employees will act in a manner that treats all users of the interconnected transmission systems in a fair and non-discriminatory manner and gives priority to the reliability of the electric power transmission system for which the RELIABILITY COORDINATOR is responsible.

1.3. Emergency actions

Notwithstanding any other provision of these Standards of Conduct, in emergency circumstances that could jeopardize operational reliability, the RELIABILITY COORDINATOR may take whatever steps are necessary to maintain system reliability.

1.4. Reporting deviations from these Standards

The Chief Compliance Officer will be responsible for RELIABILITY COORDINATOR Standards of Conduct compliance. Any deviations from these RELIABILITY COORDINATOR Standards of Conduct shall be reported to the Chief Compliance Officer whose contact information will be available on the RELIABILITY COORDINATOR website or made through the Standards of Conduct Helpline: 604-623-3726 or Hotline: 1-866-364-9376. The Chief Compliance Officer will report on the RELIABILITY COORDINATOR website the details of any deviation from these Standards of Conduct in a timely manner.

2. Rules governing employee conduct

2.1. Prohibitions

RELIABILITY COORDINATOR employees are prohibited from:

2.1.1. Marketing functions - Conducting Marketing functions except as outlined in 1.3 above.

2.1.2. Access to control facilities - Allowing access for Marketing function employees to the system control center or similar facilities used for RELIABILITY COORDINATOR functions that differs in any way from the access available to non-affiliated TRANSMISSION CUSTOMERS.

- 2.1.3. Disclosing non-public transmission function information - Disclosing to any Marketing function employees non-public information relating to the planning, directing, organizing or carrying out of day-to-day transmission operations, including the granting and denying of transmission service requests. If a RELIABILITY COORDINATOR employee discloses information in a manner contrary to the requirements of this subparagraph, the RELIABILITY COORDINATOR must, as soon as practicable, post such information on its web site and inform the affected Transmission Provider to post such information on its OASIS.
- 2.1.4. Sharing market information. Sharing market information acquired from nonaffiliated TRANSMISSION CUSTOMERS or potential non-affiliated Transmission Customers, or developed in the course of performing RELIABILITY COORDINATOR functions, with any Marketing function employees.

2.2. Transfers

RELIABILITY COORDINATOR employees or Marketing function employees are not precluded from transferring between such functions as long as such transfer is not used as a means to circumvent these Standards of Conduct. Notices of any employee transfer to or from RELIABILITY COORDINATOR functions must be reported on the RELIABILITY COORDINATOR web site. The information to be posted must include: the name of the transferring employee, the respective titles held while performing each function (i.e., on behalf of the RELIABILITY COORDINATOR, marketing function or transmission provider, or marketing function or transmission affiliate), and the effective date of the transfer. The information posted under this section must remain on the RELIABILITY COORDINATOR web site for 90 days.

2.3. Books and records

- 2.3.1. Available for audit - The RELIABILITY COORDINATOR must keep sufficient records of its activities available for audit.
- 2.3.2. Separate records - The RELIABILITY COORDINATOR must maintain its records separately from those of any affiliates and these must be available for inspection by the British Columbia Utilities Commission.

3. Rules governing maintenance of written procedures.

3.1. Publicly available

The RELIABILITY COORDINATOR must provide an explanation for posting on its RELIABILITY COORDINATOR web site describing the implementation of these Standards of Conduct in sufficient detail to demonstrate that the RELIABILITY COORDINATOR employees operate independently from marketing function employees and that it is otherwise in compliance with these requirements. The RELIABILITY COORDINATOR will post on its website a copy of this RELIABILITY COORDINATOR Standards of Conduct.

3.2. Provided to all employees

A copy of this RELIABILITY COORDINATOR Standards of Conduct document shall be given to all employees with RELIABILITY COORDINATOR responsibilities. Such employees will be required to provide a declaration confirming that they have received a copy of this RELIABILITY COORDINATOR Standards of Conduct.

3.3. Training

The RELIABILITY COORDINATOR will provide RELIABILITY COORDINATOR employees with information sessions and material so that the individuals concerned are aware of the rules contained in these RELIABILITY COORDINATOR Standards of Conduct.

3.4. Other Codes of Conduct

RELIABILITY COORDINATOR employees are also subject to the BC Hydro Code of Conduct and to the BC Hydro Standards of Conduct (Transmission) as if the RELIABILITY COORDINATOR employees were transmission function employees.

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**Application for Reliability Coordinator (RC)
Registration with the Mandatory Reliability
Standards (MRS) Program**

Attachment 2

**Terms of Reference for the
British Columbia Reliability Coordinator
Registered Entities Oversight Group**

Terms of Reference**British Columbia Reliability Coordinator Registered Entities Oversight Group****I. Purpose:**

This Terms of Reference prescribes the membership, responsibilities, and procedures of the BC Reliability Coordinator Registered Entities Oversight Group (Oversight Group) and its working groups. In these terms of reference, “BCRC” refers to the BC Hydro organizational unit “Provincial Reliability Coordination Operations”, or any successor organizational unit with the functional responsibility for performing the Reliability Coordinator (RC) function for British Columbia under the Mandatory Reliability Standards (MRS).

II. Establishment:

The Oversight Group is a standing committee established by the BCRC to ensure that MRS-registered entities in British Columbia have input and oversight with respect to the BCRC’s ongoing performance of the RC function for British Columbia. In performing the RC function, and pursuant to these Terms of Reference, BCRC management and staff and the Oversight Group shall at all times act in the interests of reliability for the Province of British Columbia, which is the BCRC’s Reliability Coordinator Area, and for the Western Interconnection. Issues and concerns raised by members of the Oversight Group will be addressed in a fair and non-discriminatory manner.

III. Composition and Governance**Membership:**

Each MRS-registered entity in the BCRC Reliability Coordinator Area (including BC Hydro) may nominate up to two employees as members of the Oversight Group. Each entity will be limited to two members on the Oversight Group regardless of the number of functions that it is registered under MRS to perform, and each registered entity will be entitled to one vote on any matter being considered by the Oversight Group, regardless of the number of members representing it on the Oversight Group or the number of functions that it is registered under MRS to perform. Decisions of the Oversight Group will be made by consensus of all members present at a meeting considering the applicable decision unless this Terms of Reference specifies otherwise.

The BCRC manager (or his or her designate) will attend all meetings of the Oversight Group but will not be a member. Other BCRC staff may attend meetings as the BCRC Manager determines is appropriate in view of the meeting agenda.

Staff of the British Columbia Utilities Commission (BCUC) will be invited to attend meetings but will not be considered members of the Oversight Group.

Leadership:

The Oversight Group shall have a Chair and a Vice-Chair, who are responsible for presiding over Oversight Group meetings and interfacing with BCRC management on meeting preparation and logistics.

The Chair and Vice-Chair shall be selected from among the members of the Oversight Group once every two years by a nomination process. Members of the Oversight Group may submit to the management of the BCRC their nomination for Chair and Vice-Chair. BCRC management will then confirm with each nominee their willingness to stand for appointment or election, as applicable. If there is more than one nomination proposed for either of the positions, an election shall be held for the position(s) with more than one nomination, with each registered entity represented on the Oversight Group being entitled to one vote in respect of each such position. Following the election, the member with the most votes in favour for each position subject to the election will be appointed to the respective position(s). If only one nomination is submitted for a position, the nominated person shall be appointed by acclamation of the members of the Oversight Group (provided they consent to the appointment).

A similar nomination and, if required, election process will also take place to fill any mid-term vacancy in the role of Chair or Vice-Chair. If no member is nominated as Chair or as Vice Chair, the BCRC manager (and his or her designate, if both positions are vacant) will fill the position(s) on an interim basis.

IV. Role and Responsibilities of the Oversight Group:

The Oversight Group's role and responsibility is to provide input and guidance to BCRC management on all matters relating to the BCRC's performance of the RC function. This includes: (1) oversight of each of the RC working groups that is established; (2) input and guidance to BCRC management on operational issues relating to RC service; (3) input and recommendations with respect to overarching reliability coordinator policies and procedures; and (4) an annual review of composition and structure of any working groups.

The Oversight Group may create working groups, as appropriate, to assist in performing its functions. Working groups are further discussed in Section IX of these Terms of Reference.

V. Role of the BCRC:

BCRC management will provide its subject matter experts and representatives who will support, communicate, and work collaboratively with members of the Oversight Group and its working groups. BCRC staff will facilitate the meetings and provide written meeting minutes. BCRC staff will collect and review all comments made by members of the Oversight Group, working groups, and other commenters, and will be responsible for discussing them with the Oversight Group or appropriate working group.

In addition, the BCRC manager shall provide a report annually on the performance of its RC services and the general state of reliability within the Western Interconnection to the Oversight Group.

VII. Consideration of Oversight Group Input:

The members of the Oversight Group and BCRC management are expected to work collaboratively to ensure that the RC's overarching policies, procedures and operational practices reflect, wherever possible, a broad consensus of the Oversight Group regarding best practices for the Reliability Coordinator function. In order to facilitate the development of such consensus, BCRC management will provide notice of any proposed substantive changes to its overarching RC policies and provide

the members of the Oversight Group with an opportunity to provide comments on any such changes. BCRC management will also work collaboratively with the Oversight Group to refer such matters to any appropriate working group.

VIII. Process for Resolving Disputes:

Where there is a difference of opinion between the membership of the Oversight Group and BCRC management on matters within the scope of responsibilities of the Oversight Group, BCRC management will implement a proposal adopted by all members of the Oversight Group present at a meeting of the Oversight Group, unless the BCRC management determines that doing so would: (1) pose an unacceptable risk to reliability in its judgment as the Reliability Coordinator, (2) be inconsistent with, or would not be required by, the reliability standards or other applicable law, or (3) be cost prohibitive as determined by the BCRC acting reasonably. In any such instance, the BCRC management will document the reasons for its decision in writing and provide them to the Oversight Group for review and discussion.

If the BCRC has determined not to implement a proposal adopted by all members of the Oversight Group for one of the reasons set out above and, after review and discussion of the BCRC's written reasons, the Oversight Group and BCRC management cannot resolve any remaining differences, then the Oversight Group may, by at least a 2/3 majority vote of all members of the Oversight Group present at a meeting of the Oversight Group, decide to further review the matter with one or more of the BC Hydro Chief Compliance Officer, the BC Hydro Executive Vice President of Operations, or an independent subject matter expert that is selected and retained by the Oversight Group to provide advice on the matter at issue. Any parties involved in dispute resolution described above will make all reasonable efforts to resolve a dispute within 60 days of the matter being initiated for further review by the Oversight Group.

To initiate any further review and dispute resolution as described above, the Oversight Group shall provide the BCRC management, in writing, with a summary of its response to the BCRC management's prior written reasons and a proposal for resolution. If the Oversight Group decides that an independent subject matter expert should be retained, the BCRC will retain an expert selected by the Oversight Group and will initially pay any applicable costs of the expert's service, subject to reimbursement by the membership of the Oversight Group (allocated equally among each registered entity represented on the Oversight Group). The expert will be required to enter into an appropriate non-disclosure agreement covering any confidential information the expert may receive and any resulting analysis or work product that is produced, and the BCRC management will then expeditiously provide the expert with any information necessary to be able to evaluate the matter. The non-disclosure agreement will not prevent the Oversight Group from sharing the conclusions reached by the subject matter expert, if appropriate, with the BCUC or WECC.

If any of the above options for further review and dispute resolution are undertaken, the Oversight Group and BCRC management shall give careful consideration to the analysis and findings produced by the applicable reviewer and shall reconsider the issue in light of the outcome of that analysis. The BCRC management will document in writing any substantive response it may have to the analysis and findings and will share this response with the members of the Oversight Group.

Claims or disputes asserting that BCRC or any MRS-registered entity (including BC Hydro) was or is not in compliance with MRS, or claims that BC Hydro failed to perform a specific task or function required of a Reliability Coordinator under MRS, will not be subject to resolution by the Oversight Group.

IX. Working Groups:

The Oversight Group may establish, as appropriate, standing working groups that are organized according to the primary functions that comprise RC service. These working groups will draw upon their collective expertise to perform assigned tasks related to the scope of the Oversight Group. Each working group will report on the status of any activities at each meeting of the Oversight Group. The Oversight Group will offer feedback and direction to the working groups as appropriate. Each working group will have a Terms of Reference drafted and agreed to by a majority of the Oversight Group members before meeting. On an annual basis, the Oversight Group and BCRC management will review the structure, composition and terms of reference of the working groups and implement any appropriate changes.

The working groups may, as necessary, form smaller task force teams to address a specific purpose within a specific timeframe. The working groups will have the responsibility to annually review the relevance and need for any task force teams.

The Oversight Group will have an initial standing working group called the Balancing Authority/ Transmission Operator (BA/TOP) Operations Working Group. This group will provide an opportunity for entities registered as a Balancing Authority or Transmission Operator within British Columbia to work closely with BCRC management and staff on issues of common interest. The initial Terms of Reference of the BA/TOP Operations Working Group are set out in Appendix A.

X. Meetings:

The Oversight Group is expected to meet on a semi-annual basis, with additional meetings where determined to be necessary by the Chair or BCRC management, or by a request of the majority of the members of the Oversight Group. Meetings may take place in person or by telephone/webinar and will be documented with minutes. Meetings are limited to the members of the Oversight Group, BCRC management and staff, and BCUC staff. Other guests may be invited if agreed by the Chair and BCRC management to provide relevant expertise or background in respect of specific agenda items.

Generally, it is anticipated that meeting agendas will include:

- Discussion of BCRC services
- Reporting by BCRC management on reliability performance metrics
- Reporting by working groups of the Oversight Group
- Consideration of BCRC procedures that impact MRS-registered entities in British Columbia, including proposed substantive changes
- Strategic planning and direction for the RC function
- Potential changes to governance or oversight of the RC function.

Additional agenda items may be added upon the request of Oversight Group members to the Chair or BCRC management provided at least two weeks in advance of the meeting.

An agenda for each Oversight Group meeting will be developed and distributed jointly by the Chair and BCRC management in advance of the meeting. The agenda will be made available to all members of the Oversight Group.

XI. Confidentiality:

Non-public information received or developed by the Oversight Group or its working groups (or by individual members of those bodies acting in their capacity as members) may not be disclosed outside the Oversight Group structure and BC Hydro without express authorization of the Oversight Group and the BCRC. Members of the Oversight Group and its working groups shall enter into a suitable non-disclosure agreement that establishes the procedures to be followed in connection with the use and sharing of non-public information.

XII. Document Sharing:

The BCRC will implement and maintain a secure SharePoint extranet site where Oversight Group, working group and any task force documents will be posted for review and, if applicable, comment by the applicable participants.

XIII. Modifications to Terms of Reference:

The Oversight Group will review the Terms of Reference on an annual basis, or as necessary, to determine whether any revisions are warranted. Any future revisions to the Terms of Reference must be approved by the Oversight Group and the BCRC.

Any proposed revisions to this Terms of Reference will be submitted to the full Oversight Group for review and consideration, and will not be recommended to the BCRC for approval unless all registered entities represented on the Oversight Group have approved the proposed change. The BCUC staff representative will have an opportunity to provide input and feedback on proposed changes to the Terms of Reference before the Oversight Group votes on a recommendation to the BCRC.

**Appendix A - Terms of Reference for Balancing Authority/Transmission Operator
Operations Working Group**

[Terms of Reference for BA/TOP Operations Working Group (Attachment 3) of this filing will be located here]

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**Application for Reliability Coordinator (RC)
Registration with the Mandatory Reliability
Standards (MRS) Program**

Attachment 3

**Terms of Reference for
Balancing Authority/Transmission Operator
Operations Working Group**

**Terms of Reference for Balancing Authority/Transmission Operator
Operations Working Group**

Balancing Authority/ Transmission Operator (BA/TOP) Operations Working Group (Operations Working Group)

In these terms of reference, “BCRC” refers to the BC Hydro organizational unit “Provincial Reliability Coordination Operations”, or any successor organizational unit with the functional responsibility for performing the Reliability Coordinator (RC) function for British Columbia under the Mandatory Reliability Standards (MRS).

The Operations Working Group has been established by the BCRC to provide an opportunity for routine engagement between the BCRC and the Oversight Group members performing the Balancing Authority (BA) and Transmission Operator (TOP) functions. This document has been, and any future revisions will be, approved by the Oversight Group and the BCRC.

Issues and concerns raised by members of the Operations Working Group will be addressed in a fair and non-discriminatory manner.

Membership:

The Operations Working Group is comprised of the following members:

BCRC:

- BCRC Manager
- BCRC real-time operations representative
- BCRC next-day operations representative

BC Hydro BA/TOP:

- BC Hydro management representative
- BC Hydro real-time operations representative
- BC Hydro next-day operations representative

FortisBC TOP:

- FortisBC management representative
- FortisBC real-time operations representative
- FortisBC next-day operations representative

Teck Metals TOP

- Teck Metals management representative

If there are changes to the list of entities registered as a BA or as a TOP in British Columbia under MRS after the establishment of the Operations Working Group, the membership of the group will be revised to ensure inclusion of all registered entities performing the BA and/or TOP function and to remove members of any entities that are no longer registered as a BA or TOP.

The Operations Working Group will have a Chair and a Vice-Chair. Upon the establishment of the Operations Working Group, the BCRC Manager will be the Chair and one of the FortisBC members of the Operations Working Group will be appointed as the Vice-Chair. Each Chair and Vice-Chair will serve a two-year term. Future appointments to the positions of Chair and Vice-Chair will be determined by consensus of all members of the Operations Working Group.

Role of the Operations Working Group

The Operations Working Group's role is to review, provide input and make recommendations to BCRC management regarding processes with direct impacts on the BA and TOP functions. This includes: (1) procedures for next-day operations; (2) procedures for real-time operations including emergencies; (3) joint operator training for RC/BA/TOP (e.g. restoration training); and (4) coordination of activities to support the reliable operation of the Bulk Electric System within British Columbia.

Interaction with the Oversight Group

The Operations Working Group will report on activities to meetings of the Oversight Group and periodically between meetings if determined to be appropriate by a consensus of all of the membership of the Operations Working Group. The reports will normally be provided by the Chair of the Operations Working Group.

Meetings

The Operations Working Group is expected to meet on a quarterly basis, with additional meetings where necessary as decided by the members. The meetings may take place in-person or via webinar/conference call. At least one meeting each year will be conducted in person, with the location alternating between the Lower Mainland and Interior regions of British Columbia. An agenda for each Oversight Committee meeting will be developed jointly between the Chair and BCRC management and will be distributed in advance of the meeting. Additional agenda items may be added upon the request of Operations Working Group members to the Chair or BCRC management provided at least two weeks in advance of the meeting. The BCRC staff will arrange for the preparation of meeting minutes and tracking of decisions and action items.

Confidentiality:

Non-public information received or developed by the Operations Working Group (or by individual members acting in their capacity as members) may not be disclosed outside the Operations Working Group structure and BC Hydro without express authorization of the Operations Working Group and the BCRC. Members of the Operations Working Group shall enter into a suitable non-disclosure agreement that establishes the procedures to be followed in connection with the use and sharing of non-public information.

Document Sharing:

The BCRC will implement and maintain a secure SharePoint extranet site where Operations Working Group documents will be posted for review and, if applicable, comment by the members and by members of the Oversight Group.

Modifications to Terms of Reference

The Operations Working Group will review the Terms of Reference on an annual basis, or as necessary, to determine whether any revisions are warranted. Any proposed revisions to this Terms of Reference will be submitted to the Oversight Group and BCRC management for review and consideration.

On an annual basis, the Oversight Group and BCRC management will also review the structure, composition and terms of reference of the Operations Working Group and implement any appropriate changes.