

**Fred James**

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May 1, 2019

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

Dear Mr. Wruck:

**RE: British Columbia Utilities Commission (BCUC or Commission)  
British Columbia Hydro and Power Authority (BC Hydro)  
British Columbia Mandatory Reliability Standards (MRS) Program  
Planning Authority (PA)/Planning Coordinator (PC) Functional Role**

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BC Hydro writes to provide a summary of BC Hydro's progress and proposed process to expand its registered PA/PC function beyond its own asset footprint.

BC Hydro is prepared to expand its PA/PC function beyond its own asset footprint to include the footprints of B.C. entities who are either registered as a Transmission Planner (**TP**) themselves, or who have an agreement with another entity to perform the TP function on their behalf under the B.C. MRS Program. This approach is in alignment with the PA/PC functional entity mapping approach used by Bonneville Power Association and the California Independent System Operator. BC Hydro is a registered TP for its asset footprint only and will not be taking on the TP function for any other registered entity in B.C. Presently, FortisBC Inc. is the only other registered TP in B.C. apart from BC Hydro.

BC Hydro has developed a three-phase process for expansion of its registered PA/PC function.

Phase 1: BC Hydro is currently performing an internal incremental activity and cost estimate for expanding the scope of its PA/PC function for reliability standards already adopted and effective in B.C. as well as those PA/PC specific reliability standards currently held in abeyance. This Phase 1 process is expected to be complete in approximately summer 2019.

Phase 2: BC Hydro will conduct PA/PC outreach workshops with all B.C. registered entities in fall 2019. The workshops are planned to be conducted with the support of the Western Electricity Coordinating Council (**WECC**) and the BCUC to explain:

- the PA/PC and TP functions;
- BC Hydro's PA/PC functional scope expansion;
- the role and responsibilities of BC Hydro as a PA/PC in relation to TP registered entities;
- the role and responsibilities of TP registered entities in B.C., and
- the limitations of BC Hydro as a registered TP for its own system.

The workshops are also intended to have WECC educate B.C. entities, currently registered as Generator Owners, Transmission Owners, and/or Distribution Providers, on the benefits of ensuring there is a TP for their footprint, the reliability risks that they face by not having a TP, and to walk through the TP associated reliability standard requirements and WECC's audit approach. These outreach workshops are expected to follow a similar model as used by United States MRS entities in conjunction with WECC when embarking upon their PA/PC functional relationships. The timeline is subject to WECC's availability.

Phase 3: After outreach, BC Hydro will then file a PA/PC assessment report to the BCUC by approximately spring 2020. The PA/PC assessment report will include all PA/PC applicable reliability standards currently adopted and effective in B.C. as well as those held in abeyance.

As additional entities in B.C. register to be TP or have an agreement with another entity to perform the TP function on their behalf, BC Hydro may determine to expand its PA/PC footprint to include these entities.

For further information, please contact Geoff Higgins at 604-623-4121 or by email at [bchydroregulatorygroup@bchydro.com](mailto:bchydroregulatorygroup@bchydro.com).

Yours sincerely,



Fred James  
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