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May 29, 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:

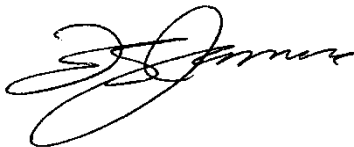
**RE: Project No. 1598978**  
**British Columbia Utilities Commission (BCUC or Commission)**  
**British Columbia Hydro and Power Authority (BC Hydro)**  
**Application for Reliability Coordinator (RC) Registration with the**  
**Mandatory Reliability Standards (MRS) Program**  
**Responses to BCUC Information Request No. 2**

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BC Hydro writes in compliance with BCUC Order No. G-98-19 to provide, as Exhibit B-11, its responses to BCUC Information Request (IR) No. 2.

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  
Chief Regulatory Officer

st/ma

Enclosure (1)

<b>British Columbia Utilities Commission</b> Information Request No. <b>2.18.1</b> Dated: <b>May 10, 2019</b> British Columbia Hydro & Power Authority Response issued <b>May 29, 2019</b>	Page 1 of 1
British Columbia Hydro & Power Authority <b>Application for Reliability Coordinator Registration with  the Mandatory Reliability Standards Program</b>	<b>Exhibit:  B-11</b>

**18.0 Reference: Reliability Coordinator Standards of Conduct  
Exhibit B-10, Attachment 1, pp. 1–4  
Reliability Coordinator Functional Registration**

Following consultation with registered interveners, British Columbia Hydro and Power Authority (BC Hydro) submitted its Reliability Coordinator Standards of Conduct (RC SoC) that BC Hydro states it would follow if registered as the RC for British Columbia. The Standards of Conduct adopted by BC Hydro is different from the North America Electric Reliability Corporation (NERC) RC Standards of Conduct.

2.18.1 Did BC Hydro consider the NERC RC Standards of Conduct when developing its own standards of conduct?

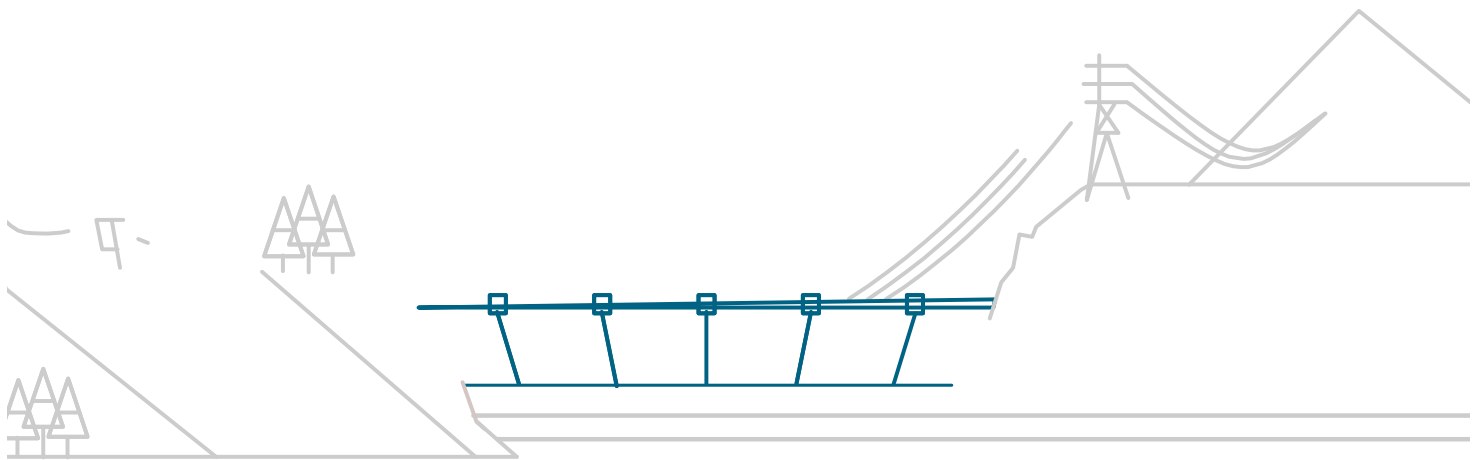
**RESPONSE:**

**Yes. BC Hydro prepared the RC SoC based on the NERC RC Standards of Conduct, modified to remove reporting obligations to NERC, and to be consistent with BC Hydro’s existing Standards of Conduct (Transmission). BC Hydro has had a Standards of Conduct (Transmission) applicable to transmission function information in place since November 1998 and many of the RC employees are already subject to and familiar with these Standards of Conduct (Transmission). In addition, feedback received during the consultation process was incorporated into the RC SoC that related to reporting deviations from the RC SoC.**

**The attachment to this response is a comparison of BC Hydro’s RC SoC as against the NERC RC Standards of Conduct and a clean version including changes indicated in BC Hydro’s response to BCUC IRs 2.19.1 and 2.23.1.**

~~NERC~~ **BC HYDRO**

# Reliability Coordinator Standards of Conduct



## Introduction

~~An entity performing the functions of British Columbia Hydro and Power Authority (“BC Hydro”) as Reliability Coordinator (the “RELIABILITY COORDINATOR”)~~ must treat all ~~users~~ System Users of the interconnected transmission systems in a fair and non-discriminatory manner. ~~A BC Hydro as RELIABILITY COORDINATOR must conduct~~ has developed these Standards of Conduct to provide the framework to support conducting its affairs in conformance with ~~the following standards:~~ this objective.

### 1. General rule:

#### 1.1. Independence:

Except as provided in paragraph ~~1.21.3~~ of this section, the RELIABILITY COORDINATOR, ~~its employees, or the employees of any of its affiliates who perform RELIABILITY COORDINATOR functions (“RELIABILITY COORDINATOR employees”)~~ Employees must operate independently of ~~employees/persons who engage in retail (energy purchases for or sales to native load customers) or wholesale (energy purchases or sales for resale) merchant functions (“Merchant employees”).~~ [Note: Marketing Function Employees. “Operate independently” does not mean or require corporate separation of the RELIABILITY COORDINATOR from the Transmission Provider or Merchant employees or merchant Marketing Function Employees or functions.]

#### 1.2. Priority

RELIABILITY COORDINATOR Employees will act in a manner that treats all System Users 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. ~~1.2.~~Emergency actions:

Notwithstanding any other provision of these ~~standards~~ Standards of ~~conduct~~ Conduct, in emergency circumstances that could jeopardize operational ~~security,~~ reliability, the RELIABILITY ~~COORDINATORS~~ COORDINATOR may take whatever steps are necessary to maintain the reliability of the electric power transmission system ~~security.~~

#### 1.4. Responsibilities

~~1.3. Reporting deviations from these Standards.~~ RELIABILITY COORDINATORS must report to NERC and the appropriate REGIONAL COUNCIL(S) the details of any deviation from these standards of conduct, within 24 hours of such deviation. NERC staff will post the reports to the NERC RELIABILITY COORDINATOR web site. The Chief Compliance Officer will be responsible for RELIABILITY COORDINATOR Standards of Conduct compliance.

RELIABILITY COORDINATOR Managers shall review these Standards of Conduct with RELIABILITY COORDINATOR Employees annually and shall report on these reviews to the Chief Compliance Officer annually and on request.

#### 1.5. Reporting deviations from these Standards

Any deviations from these RELIABILITY COORDINATOR Standards of Conduct shall be reported immediately after discovery by anyone having knowledge of an event or situation in which a RELIABILITY COORDINATOR Employee acted in a manner contrary to these Standards of Conduct. Reporting may be done anonymously or not, and anyone who reports in good faith a situation that is contrary to these Standards of Conduct will not be the subject of retaliation or of administrative or disciplinary measures. Reporting shall be directed 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 shall promptly investigate any matter reported in good faith, and shall do so in a fair, impartial, and confidential manner and will report on the RELIABILITY COORDINATOR website a summary of any deviation from these Standards of Conduct in a timely manner.

Further to an investigation, the Chief Compliance Officer shall issue any decision or take any corrective action that he or she considers appropriate.

**2. Rules governing employee conduct:**

**2.1. Prohibitions-**

RELIABILITY COORDINATOR ~~employees~~Employees are prohibited from:

- 2.1.1. ~~Merchant~~Marketing functions- ~~Conducting MerchantMarketing functions-except as outlined in 1.2 above.~~
- 2.1.2. Access to control facilities- ~~Allowing access for Merchant-employees~~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~~System Users.
- 2.1.3. Disclosing ~~system non-public transmission function~~ information- ~~Disclosing to Merchant-employees any information concerning the transmission system through non-public-communications conducted off the OASIS, through access to information not posted on the OASIS that is not at the same time available to non-affiliated Transmission Customers without restriction, or through information on the OASIS that is not at the same time publicly available to all OASIS users (such as E-mail)~~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~~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 ~~the NERC RELIABILITY COORDINATOR~~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 non- affiliated ~~TRANSMISSION-CUSTOMERS~~System Users or potential non-affiliated ~~TransmissionCustomers~~System Users, or developed in the course of performing RELIABILITY COORDINATOR functions, with any ~~Merchant-employees~~Marketing Function Employees.

**2.2. Transfers-**

RELIABILITY COORDINATOR ~~employees or Merchant-employees~~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~~Standards of ~~conduct~~Conduct. Notices of any employee transfer to or from RELIABILITY COORDINATOR functions must be reported ~~to NERC and the appropriate REGIONAL COUNCIL(S)- NERC staff will post the reports to the NERC 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, ~~merchant~~marketing function or transmission provider, or ~~merchant~~marketing function or transmission affiliate), and the effective date of the transfer. The

information posted under this section must remain on the ~~NERC~~[RELIABILITY COORDINATOR](#) web site for 90 days.

**2.3. Books and records-**

2.3.1. Available for audit.~~A - The~~ [RELIABILITY COORDINATOR](#) must keep sufficient records of its activities available for audit.

2.3.2. Separate records.~~A - The~~ [RELIABILITY COORDINATOR](#) must maintain its records separately from those of any affiliates and these must be available for inspection by ~~NERC and the appropriate Regional Council(s)~~[the British Columbia Utilities Commission](#).

2.3.3. [An annual report of the deviations from this Standards of Conduct, as reported in accordance with section 1.5 shall be submitted to the Registered Entities Oversight Group and posted on the RELIABILITY COORDINATOR website.](#)

**3. Rules governing maintenance of written procedures.**

**3.1. Publicly available.~~A~~**

[The](#) [RELIABILITY COORDINATOR](#) must ~~provide~~[post](#) an explanation ~~for posting on the NERC~~[its](#) [RELIABILITY COORDINATOR](#) web site describing the implementation of these ~~standards~~[Standards](#) of ~~conduct~~[Conduct](#) in sufficient detail to demonstrate that the [RELIABILITY COORDINATOR](#) ~~employees~~[Employees](#) operate independently from ~~merchant employees~~[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 ~~the signed~~[this RELIABILITY COORDINATOR](#) Standards of Conduct document shall be given to all employees with [RELIABILITY COORDINATOR](#) responsibilities.

~~AGREEMENT~~[As part of the process of being designated a NERC RELIABILITY COORDINATOR, \[Name of Organization\] hereby agrees to abide by the terms of the foregoing NERC Reliability Coordinator Standards of Conduct. Such employees will be required to provide a declaration confirming that they have received and read 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.](#)

**4. Definitions**

Chief Compliance Officer - means the person BC Hydro has designated to be responsible for RELIABILITY COORDINATOR Standards of Conduct compliance.

RELIABILITY COORDINATOR Employees – means employees of BC Hydro or employees of any of its affiliates who perform RELIABILITY COORDINATOR functions. The definition includes both employees as well as personnel hired on contract by the Reliability Coordinator Manager to perform Reliability Coordinator functions.

*{Name of Organization}*

By: \_\_\_\_\_

Title: \_\_\_\_\_

Date: \_\_\_\_\_

~~NORTH AMERICAN ELECTRIC RELIABILITY COUNCIL~~

By: \_\_\_\_\_

Title: \_\_\_\_\_

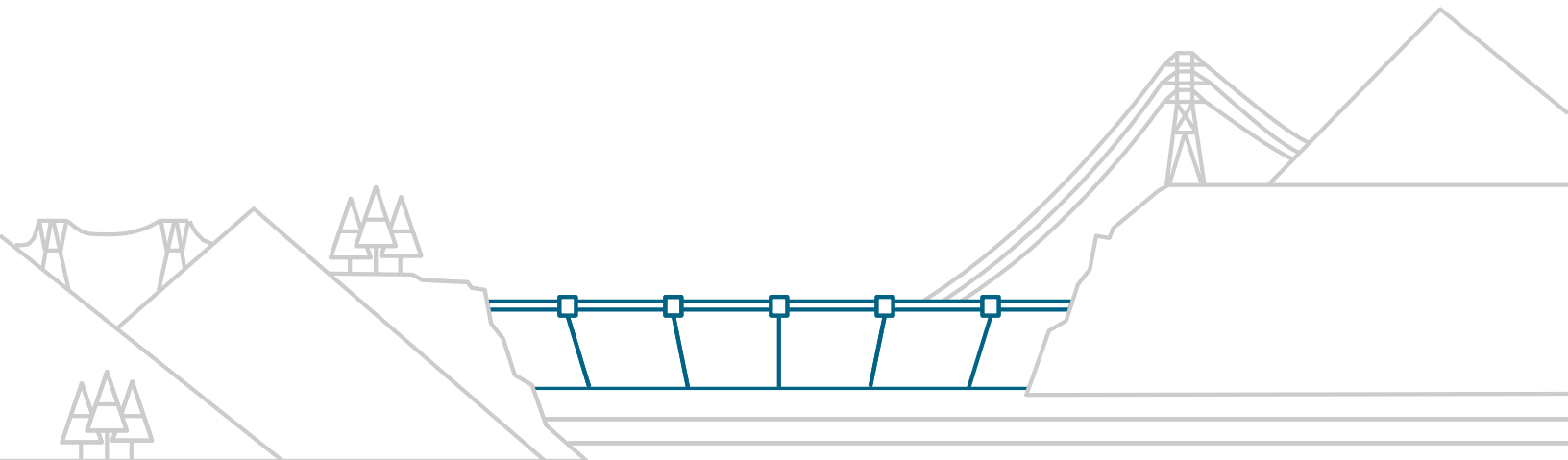
System User - Any user of the interconnected transmission system for which the Reliability Coordinator is responsible.

Date: \_\_\_\_\_

Marketing Function Employees - employees/persons who are involved 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.

# BC HYDRO

## Reliability Coordinator Standards of Conduct





## **Introduction**

British Columbia Hydro and Power Authority (“BC Hydro”) as Reliability Coordinator (the “RELIABILITY COORDINATOR”) must treat all System Users of the interconnected transmission systems in a fair and non-discriminatory manner. BC Hydro as RELIABILITY COORDINATOR has developed these Standards of Conduct to provide the framework to support conducting its affairs in conformance with this objective.

### **1. General rule**

#### **1.1. Independence**

Except as provided in paragraph 1.3 of this section, the RELIABILITY COORDINATOR Employees must operate independently of 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 System Users 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 the reliability of the electric power transmission system.

#### **1.4. Responsibilities**

The Chief Compliance Officer will be responsible for RELIABILITY COORDINATOR Standards of Conduct compliance.

RELIABILITY COORDINATOR Managers shall review these Standards of Conduct with RELIABILITY COORDINATOR Employees annually and shall report on these reviews to the Chief Compliance Officer annually and on request.

#### **1.5. Reporting deviations from these Standards**

Any deviations from these RELIABILITY COORDINATOR Standards of Conduct shall be reported immediately after discovery by anyone having knowledge of an event or situation in which a RELIABILITY COORDINATOR Employee acted in a manner contrary to these Standards of Conduct. Reporting may be done anonymously or not, and anyone who reports in good faith a situation that is contrary to these Standards of Conduct will not be the subject of retaliation or of administrative or disciplinary measures. Reporting shall be directed 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 shall promptly investigate any matter reported in good faith, and shall do so in a fair, impartial, and confidential manner and will report on the RELIABILITY COORDINATOR website a summary of any deviation from these Standards of Conduct in a timely manner.

Further to an investigation, the Chief Compliance Officer shall issue any decision or take any corrective action that he or she considers appropriate.

## **2. Rules governing employee conduct**

### **2.1. Prohibitions**

RELIABILITY COORDINATOR Employees are prohibited from:

- 2.1.1. Marketing functions - Conducting Marketing functions.
- 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 System Users.
- 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 non-affiliated System Users or potential non-affiliated System Users, 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.
- 2.3.3. An annual report of the deviations from this Standards of Conduct, as reported in accordance with section 1.5 shall be submitted to the Registered Entities Oversight Group and posted on the RELIABILITY COORDINATOR website.

### **3. Rules governing maintenance of written procedures.**

#### **3.1. Publicly available**

The RELIABILITY COORDINATOR must post an explanation 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 and read 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.

### **4. Definitions**

**Chief Compliance Officer** - means the person BC Hydro has designated to be responsible for RELIABILITY COORDINATOR Standards of Conduct compliance.

**RELIABILITY COORDINATOR Employees** – means employees of BC Hydro or employees of any of its affiliates who perform RELIABILITY COORDINATOR functions. The definition includes both employees as well as personnel hired on contract by the Reliability Coordinator Manager to perform Reliability Coordinator functions.

**System User** - Any user of the interconnected transmission system for which the Reliability Coordinator is responsible.

**Marketing Function Employees** - employees/persons who are involved 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.

<b>British Columbia Utilities Commission</b> Information Request No. <b>2.18.2</b> Dated: <b>May 10, 2019</b> British Columbia Hydro & Power Authority Response issued <b>May 29, 2019</b>	Page 1 of 1
British Columbia Hydro & Power Authority <b>Application for Reliability Coordinator Registration with  the Mandatory Reliability Standards Program</b>	<b>Exhibit:  B-11</b>

**18.0 Reference: Reliability Coordinator Standards of Conduct  
Exhibit B-10, Attachment 1, pp. 1–4  
Reliability Coordinator Functional Registration**

Following consultation with registered interveners, British Columbia Hydro and Power Authority (BC Hydro) submitted its Reliability Coordinator Standards of Conduct (RC SoC) that BC Hydro states it would follow if registered as the RC for British Columbia. The Standards of Conduct adopted by BC Hydro is different from the North America Electric Reliability Corporation (NERC) RC Standards of Conduct.

2.18.2 Please outline any differences or deviations between BC Hydro and NERC's RC Standards of Conduct. Please explain the reasons for any differences and/or deviations.

**RESPONSE:**

**Please refer to BC Hydro's response to BCUC IR 2.18.1.**

<b>British Columbia Utilities Commission</b> Information Request No. <b>2.19.1</b> Dated: <b>May 10, 2019</b> British Columbia Hydro & Power Authority Response issued <b>May 29, 2019</b>	Page 1 of 1
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**19.0 Reference: Reliability Coordinator Standards of Conduct  
Exhibit B-10, Attachment 1, p. 2  
Introduction**

BC Hydro's RC SoC states:

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 has developed these Standards of Conduct to provide the framework to support conducting its affairs in conformance with this objective.

- 2.19.1 Please confirm whether "users" in the above sentence is referring to the defined term "system users" as included in Section 4 of the RC SoC. If not, please explain.

**RESPONSE:**

**Confirmed. BC Hydro will change the term "users" in the introduction to "System Users". Please refer to the attachment in BC Hydro's response to BCUC IR 2.18.1.**

<b>British Columbia Utilities Commission</b> Information Request No. <b>2.20.1</b> Dated: <b>May 10, 2019</b> British Columbia Hydro & Power Authority Response issued <b>May 29, 2019</b>	Page 1 of 2
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**20.0 Reference: Reliability Coordinator Standards of Conduct  
Exhibit B-10, Attachment 1, p. 3  
Rules Governing Employee Conduct**

BC Hydro's RC SoC states:

RELIABILITY COORDINATOR Employees are prohibited from:

2.1.1. Marketing functions - Conducting Marketing functions.

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 System Users.

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 non-affiliated System Users or potential non-affiliated System Users, or developed in the course of performing RELIABILITY COORDINATOR functions, with any Marketing Function Employees.

2.20.1 By virtue of the definition of "Marketing Function Employees" and the specific restrictions being limited to information sharing/access between the two specific groups "Reliability Coordinator Employees" and "Market Function Employees," please explain whether this implies that RC Employees are permitted to disclose information or provide access generally to non-RC function employees (including members of the public and employees of BC Hydro subsidiary companies).

**RESPONSE:**

**The RC SoC are not intended to prohibit RC Employees from working collaboratively with employees outside the RC function. That does not mean that RC Employees are permitted to disclose information or provide access generally to anyone that is not a Marketing Function Employee without restriction. In addition to the prohibitions set out in the RC SoC, RC Employees are also subject to BC Hydro's Code of Conduct and Standards of Conduct (Transmission), as well**

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British Columbia Hydro & Power Authority <b>Application for Reliability Coordinator Registration with the Mandatory Reliability Standards Program</b>	<b>Exhibit: B-11</b>

**as agreements with third parties that may impose additional confidentiality provisions or restrictions on disclosure or data sharing. Subject to all such prohibitions and restrictions, RC Employees are permitted to disclose information to non-RC function employees who are not Marketing Function Employees where such information will assist the non-RC function employee with performance of their responsibilities at BC Hydro.**

<b>British Columbia Utilities Commission</b> Information Request No. <b>2.21.1</b> Dated: <b>May 10, 2019</b> British Columbia Hydro & Power Authority Response issued <b>May 29, 2019</b>	Page 1 of 1
British Columbia Hydro & Power Authority <b>Application for Reliability Coordinator Registration with  the Mandatory Reliability Standards Program</b>	<b>Exhibit:  B-11</b>

**21.0 Reference: Reliability Coordinator Standards of Conduct  
Exhibit B-10, Attachment 1, p. 4  
Definitions**

BC Hydro's RC SoC states:

Reliability Coordinator Employees means employees of BC Hydro or employees of any of its affiliates who perform Reliability Coordinator functions. The definition includes both employees as well as personnel hired on contract by the Reliability Coordinator Manager to perform Reliability Coordinator functions.

2.21.1 Please confirm, or otherwise explain, whether Chief Compliance Officer and the RC Manager(s) are also required to abide by the terms set out in the RC SoC, including all outlined provisions.

**RESPONSE:**

**The RC Manager performs a RC function and so therefore is a Reliability Coordinator Employee and is required to abide by the terms set out in the RC SoC. The Chief Compliance Officer is not included in the definition of Reliability Coordinator Employees and thus the full RC SoC is not considered applicable to the role of Chief Compliance Officer. However, the Chief Compliance Officer does have a role in implementation of the RC SoC as indicated in sections 1.4 and 1.5 of the RC SoC.**

**Please also refer to BC Hydro's response to BCUC IR 2.22.1.**



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**21.0 Reference: Reliability Coordinator Standards of Conduct  
Exhibit B-10, Attachment 1, p. 4  
Definitions**

BC Hydro's RC SoC states:

Reliability Coordinator Employees means employees of BC Hydro or employees of any of its affiliates who perform Reliability Coordinator functions. The definition includes both employees as well as personnel hired on contract by the Reliability Coordinator Manager to perform Reliability Coordinator functions.

2.21.2 Please comment on whether Section 4 "Definitions" would be more appropriately placed at the beginning of the document to provide better context to the reader.

**RESPONSE:**

**BC Hydro does not see a substantive benefit to placing the section 4 "Definitions" at the beginning of the SoC as the document is short and there are only four defined terms.**

<b>British Columbia Utilities Commission</b> Information Request No. <b>2.22.1</b> Dated: <b>May 10, 2019</b> British Columbia Hydro & Power Authority Response issued <b>May 29, 2019</b>	Page 1 of 1
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**22.0 Reference: Reliability Coordinator Standards of Conduct  
Exhibit B-10, Attachment 1, p. 4  
Reporting Deviations from these Standards**

BC Hydro's RC SoC states:

Any deviations from these RELIABILITY COORDINATOR Standards of Conduct shall be reported immediately after discovery by anyone having knowledge of an event or situation in which a RELIABILITY COORDINATOR Employee acted in a manner contrary to these Standards of Conduct. Reporting may be done anonymously or not, and anyone who reports in good faith a situation that is contrary to these Standards of Conduct will not be the subject of retaliation or of administrative or disciplinary measures. Reporting shall be directed 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 shall promptly investigate any matter reported in good faith, and shall do so in a fair, impartial, and confidential manner and will report on the RELIABILITY COORDINATOR website a summary of any deviation from these Standards of Conduct in a timely manner.

2.22.1 Please explain who performs the investigation if the subject of the reported deviation from the RC SoC is the Chief Compliance Officer.

**RESPONSE:**

**The Chief Compliance Officer is not a Reliability Coordinator Employee. Any potential deviations by the Chief Compliance Officer that may hypothetically arise may be reviewed by BC Hydro's General Counsel.**

<b>British Columbia Utilities Commission</b> Information Request No. <b>2.23.1</b> Dated: <b>May 10, 2019</b> British Columbia Hydro & Power Authority Response issued <b>May 29, 2019</b>	Page 1 of 1
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**23.0 Reference: Reliability Coordinator Standards of Conduct  
 Exhibit B-10, Attachment 1, p.4  
 Rules Governing Maintenance of Written Procedures**

BC Hydro's RC SoC states:

A copy of this Reliability Coordinator Standards of Conduct 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.

2.23.1 Please confirm that the sentence should read: "Such employees will be required to provide a declaration confirming that they have received and read a copy of this Reliability Coordinator Standards of Conduct."

**RESPONSE:**

**Confirmed. BC Hydro agrees with the recommended change proposed in this IR and will incorporate it into the BC Hydro RC SoC accordingly. Please refer to the attachment in BC Hydro response to BCUC IR 2.18.1.**

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**24.0 Reference: Reliability Coordinator Standards of Conduct  
 Exhibit B-10, Attachment 1, p. 4  
 Books and Records**

BC Hydro's RC SoC states: "An annual report of the deviations from this Standards of Conduct, as reported in accordance with section 1.5 shall be submitted to the Registered Entities Oversight Group and posted on Reliability Coordinator website."

2.24.1 Please confirm that a copy of this annual report will be filed with the British Columbia Utilities Commission (BCUC).

**RESPONSE:**

**BC Hydro will post a copy of the report on its public RC website. If the BCUC wishes to receive a copy for informational purposes, BC Hydro will provide it.**

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**24.0 Reference: Reliability Coordinator Standards of Conduct  
Exhibit B-10, Attachment 1, p. 4  
Books and Records**

BC Hydro's RC SoC states: "An annual report of the deviations from this Standards of Conduct, as reported in accordance with section 1.5 shall be submitted to the Registered Entities Oversight Group and posted on Reliability Coordinator website."

2.24.2 Would BC Hydro be amenable to reporting any deviations of the RC SoC to the BCUC within 30 days of discovery? Please explain your response.

**RESPONSE:**

**In accordance with section 1.5 of the RC SoC, following an investigation BC Hydro will post a summary of any deviations to the RC SoC on its website in a timely manner, which may not always be done within 30 days of discovery. BC Hydro will provide a copy to the BCUC for informational purposes at the time of posting.**

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**25.0 Reference: British Columbia Reliability Coordinator Oversight Group  
Exhibit B-10, Attachment 2, p. 1  
Purpose**

BC Hydro Terms of Reference for the British Columbia Reliability Coordinator Registered Entities Oversight Group (TOROG) states:

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) functions for British Columbia under the Mandatory Reliability Standards (MRS).

2.25.1 Please confirm that the BCRC is entirely made up of BC Hydro employees.

**RESPONSE:**

**Confirmed. The BCRC is comprised entirely of BC Hydro employees at this time.**

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**25.0 Reference: British Columbia Reliability Coordinator Oversight Group  
Exhibit B-10, Attachment 2, p. 1  
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BC Hydro Terms of Reference for the British Columbia Reliability Coordinator Registered Entities Oversight Group (TOROG) states:

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) functions for British Columbia under the Mandatory Reliability Standards (MRS).

2.25.1 Please confirm that the BCRC is entirely made up of BC Hydro employees.

2.25.1.1 If confirmed, please explain why it was necessary to identify BCRC as a standalone entity given that it represents a division of BC Hydro.

**RESPONSE:**

**BC Hydro has determined that the RC function will be performed by dedicated employees that do not perform the existing functions of BC Hydro (i.e., Balancing Authority, Transmission Operator, Transmission Service Provider). To ensure clarity in communications for entities outside BC Hydro, BC Hydro considered it beneficial to identify the BCRC as an organizational unit within BC Hydro. For example, FortisBC, as a Transmission Operator, will have reason to contact either BC Hydro as the Balancing Authority, Transmission Operator or Reliability Coordinator. Because the BC Hydro RC staff work independently from Balancing Authority and/or Transmission Operator staff, BC Hydro considered it helpful to distinguish communications between BCRC and BC Hydro Balancing Authority and/or Transmission Operator functions.**

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**25.0 Reference: British Columbia Reliability Coordinator Oversight Group  
Exhibit B-10, Attachment 2, p. 1  
Purpose**

BC Hydro Terms of Reference for the British Columbia Reliability Coordinator Registered Entities Oversight Group (TOROG) states:

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) functions for British Columbia under the Mandatory Reliability Standards (MRS).

2.25.2 Please provide a list of intended members of the BCRC, including job titles.

**RESPONSE:**

**The existing and intended members of the BCRC currently include the following:**

Name	Title
Asher Steed	Manager, Provincial Reliability Coordination Operations
Troy Campbell	Reliability Coordination Operations Specialist
Martin Hanlon	Reliability Coordination Operations Specialist
Tony Nguyen	Reliability Coordination Operations Specialist
Mark Prosperi-Porta	Reliability Coordination Operations Specialist
Erica Simpson	Reliability Coordination Operations Specialist
Bryan Wolosnick	Reliability Coordination Operations Specialist
Muthanna Abusbeaa	Reliability Coordination Senior Engineer
Ben Braconnier	Reliability Coordination Senior Engineer
Eric Desjardins	Reliability Coordination Specialist Engineer
VACANT	Reliability Coordination Operations Specialist
VACANT	Reliability Coordination Compliance Advisor
VACANT	Reliability Coordination Administrative Support Assistant



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**25.0 Reference: British Columbia Reliability Coordinator Oversight Group  
Exhibit B-10, Attachment 2, p. 1  
Purpose**

BC Hydro Terms of Reference for the British Columbia Reliability Coordinator Registered Entities Oversight Group (TOROG) states:

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) functions for British Columbia under the Mandatory Reliability Standards (MRS).

2.25.3 Please confirm, or otherwise explain, if BC Hydro employees and contractors that are part of BCRC will be solely dedicated to performing the RC function. If not, please explain.

**RESPONSE:**

**The staff that are part of the BCRC are primarily devoted to performing the RC function. It is expected that these staff may support BC Hydro as necessary, for example, to represent BC Hydro at industry committees or MRS related initiatives.**

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**26.0 Reference: British Columbia Reliability Coordinator Oversight Group Exhibit B-10, Attachment 2, p. 1; Attachment 1, p. 4 Membership**

BC Hydro's TOROG states:

Each MRS-registered entity in the BCRC Reliability Coordinator Area (including BC Hydro) is entitled to appoint two representatives as members of the Oversight Group. Representatives must be employees of the entity. Each entity will be limited to two members of the Oversight Group regardless of the number of functions that 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, if it has at least one member representing it on the Oversight Group and is register for at least one MRS function.

BC Hydro's TOROG also states:

The BCRC manager (or his or her designate) will attend 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.

Section 4 of BC Hydro's RC SoC states:

Reliability Coordinator Employees – means employees of BC Hydro or employees of any of its affiliates who perform Reliability Coordinator functions. The definition includes both employees as well as personnel hired on contract by the Reliability Coordinator Manager to perform Reliability Coordinator functions.

2.26.1 Please confirm that a contractor can represent BC Hydro on the BCRC, or in any function related to performing RC duties?

**RESPONSE:**

**Confirmed. BC Hydro could hire a contractor to perform the duties of the RC function. However, BC Hydro currently plans to staff the BCRC roles with BC Hydro employees and has no plans to hire contract staff to perform the duties.**

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**26.0 Reference: British Columbia Reliability Coordinator Oversight Group Exhibit B-10, Attachment 2, p. 1; Attachment 1, p. 4 Membership**

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BC Hydro's TOROG also states:

The BCRC manager (or his or her designate) will attend 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.

Section 4 of BC Hydro's RC SoC states:

Reliability Coordinator Employees – means employees of BC Hydro or employees of any of its affiliates who perform Reliability Coordinator functions. The definition includes both employees as well as personnel hired on contract by the Reliability Coordinator Manager to perform Reliability Coordinator functions.

2.26.2 Please confirm that MRS-registered entities, including BC Hydro, cannot be represented on the Oversight Group by a contractor?

**RESPONSE:**

**Confirmed. The Terms of Reference was drafted such that MRS registered entities, including BC Hydro, would be represented by employees of each MRS registered entity on the Oversight Group.**

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**26.0 Reference: British Columbia Reliability Coordinator Oversight Group Exhibit B-10, Attachment 2, p. 1; Attachment 1, p. 4 Membership**

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BC Hydro's TOROG also states:

The BCRC manager (or his or her designate) will attend 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.

Section 4 of BC Hydro's RC SoC states:

Reliability Coordinator Employees – means employees of BC Hydro or employees of any of its affiliates who perform Reliability Coordinator functions. The definition includes both employees as well as personnel hired on contract by the Reliability Coordinator Manager to perform Reliability Coordinator functions.

2.26.2 Please confirm that MRS-registered entities, including BC Hydro, cannot be represented on the Oversight Group by a contractor?

2.26.2.1 If so, please explain why MRS-registered entities appear to be limited to employee-only representation at Oversight Group meetings, given that many MRS-registrants, other than BC Hydro, may not have sufficient internal resources available to dedicate to MRS-related matters.

**RESPONSE:**

**The TOROG was drafted to ensure that representation at the Oversight Group is reflective of the MRS registered entities of B.C. Feedback was received during our entity consultation period recommending 'employee-only' representation. BC Hydro has not received any feedback from entities expressing concern with this requirement.**

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**26.0 Reference: British Columbia Reliability Coordinator Oversight Group Exhibit B-10, Attachment 2, p. 1; Attachment 1, p. 4 Membership**

BC Hydro's TOROG states:

Each MRS-registered entity in the BCRC Reliability Coordinator Area (including BC Hydro) is entitled to appoint two representatives as members of the Oversight Group. Representatives must be employees of the entity. Each entity will be limited to two members of the Oversight Group regardless of the number of functions that 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, if it has at least one member representing it on the Oversight Group and is register for at least one MRS function.

BC Hydro's TOROG also states:

The BCRC manager (or his or her designate) will attend 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.

Section 4 of BC Hydro's RC SoC states:

Reliability Coordinator Employees – means employees of BC Hydro or employees of any of its affiliates who perform Reliability Coordinator functions. The definition includes both employees as well as personnel hired on contract by the Reliability Coordinator Manager to perform Reliability Coordinator functions.

2.26.2 Please confirm that MRS-registered entities, including BC Hydro, cannot be represented on the Oversight Group by a contractor?

2.26.2.2 Please clarify why BCRC staff are permitted to attend meetings when other entities are limited to only two representatives during the oversight group meetings. Please clarify if other MRS entities may invite their own employees to attend the oversight group meetings and please explain your response.

**RESPONSE:**

**The BCRC manager and staff are performing the RC function, therefore it is necessary to have applicable BCRC subject matter expertise present to support the items on any given meeting agenda and to be available to address questions arising from the Oversight Group. As such, BC Hydro expects the staff in attendance will vary depending on the agenda items.**

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**BC Hydro believes it is prudent to limit the number of representatives to two employees for each entity to ensure that meetings are effective. This does not limit engagement with entities outside of the TOROG.**

**Further, as indicated in section IX of the TOROG, “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”. This may include invitees of registered entities as deemed appropriate.**

**BC Hydro notes that during the engagement period with MRS registered entities, no comments were made expressing concern about the TOROG limiting each entity to two representatives.**

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**27.0 Reference: British Columbia Reliability Coordinator Oversight Group  
 Exhibit B-10, Attachment 2, p. 1  
 Membership**

BC Hydro's TOROG states:

Decisions of the Oversight Group will be made by consensus of all members present at a meeting (including members present at the meeting by conference call) considering the applicable decision unless this Terms of Reference specifies otherwise. Where used in this Terms of Reference, 'consensus' will mean either positive agreement of all relevant parties entitled to participate in a decision or vote on a matter, or the absence of any objection from any relevant party to participate in a decision or vote in a matter. For greater certainty, if a party that is entitled to participate in a decision or vote on a matter abstains from such participation or vote, the abstention will not prevent a consensus.

2.27.1 Please explain what happens if consensus is not reached on a matter being considered by the Oversight group. Please provide an example to demonstrate your response.

**RESPONSE:**

**The Oversight Group, as part of its role and responsibilities, is to provide “input and guidance to the BCRC on all matters relating to the BCRC’s performance of the RC function”, it is not to decide how the BCRC will perform the function. The members of the Oversight Group and BCRC are expected to work collaboratively as set out in section VI of the TOROG.**

**If consensus is not reached on a matter being considered by the Oversight Group, further process could take place to seek to bring the group to “consensus” as such term is defined in section III of the TOROG including, exploring and understanding the reasons preventing consensus and the consideration of other options as potential solutions.**

**A working example may be as follows:**

**A revised standard with new requirements has been adopted in B.C. and will be effective for the RC and other function types. The issue has been brought to the Oversight Group for discussion to reach a consensus on how the RC will implement new procedures relating to the standard in coordination with the other affected functions. A broad discussion takes place to generate ideas on implementation of the new requirements. Several proposals are considered and are short-listed based on support amongst members. At this stage it is important to understand the reasoning behind any concerns or lack of support. The group**

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would go through a period of addressing each concern to reach a point where there are no parties against implementing the chosen option. Consensus is reached when there are no disagreements on how to proceed. Entities may choose to abstain if they feel the issue is not relevant to them. In this example, there may be some entities for which the standard does not apply and so they are minimally affected by the chosen option and believe abstention is appropriate. As long as no entities object to proceeding with the chosen option, then consensus has been reached.

If the Oversight Group cannot ultimately reach consensus on the input and guidance to be provided to the BCRC regarding implementation of the new standard, within a reasonable period of time the BCRC may proceed to make what it considers to be the best choice for implementation of the new standard and will continue to seek guidance and input from the Oversight Group as implementation proceeds.



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**27.0 Reference: British Columbia Reliability Coordinator Oversight Group  
Exhibit B-10, Attachment 2, p. 1  
Membership**

BC Hydro's TOROG states:

Decisions of the Oversight Group will be made by consensus of all members present at a meeting (including members present at the meeting by conference call) considering the applicable decision unless this Terms of Reference specifies otherwise. Where used in this Terms of Reference, 'consensus' will mean either positive agreement of all relevant parties entitled to participate in a decision or vote on a matter, or the absence of any objection from any relevant party to participate in a decision or vote in a matter. For greater certainty, if a party that is entitled to participate in a decision or vote on a matter abstains from such participation or vote, the abstention will not prevent a consensus.

2.27.1 Please explain what happens if consensus is not reached on a matter being considered by the Oversight group. Please provide an example to demonstrate your response.

2.27.1.1 If a consensus cannot be reached, will the matter being considered be referred to the BCUC for adjudication, if required? Please explain why or why not.

**RESPONSE:**

**After a period of attempting to reach consensus, the Oversight Group may seek other assistance to help in moving an issue forward. This could include assigning the issue to a working group as discussed in section VIII of the TOROG, or the help of an external facilitator. The TOROG does not contemplate BCUC adjudication of decisions by the Oversight Group.**

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**27.0 Reference: British Columbia Reliability Coordinator Oversight Group  
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BC Hydro's TOROG states:

Decisions of the Oversight Group will be made by consensus of all members present at a meeting (including members present at the meeting by conference call) considering the applicable decision unless this Terms of Reference specifies otherwise. Where used in this Terms of Reference, 'consensus' will mean either positive agreement of all relevant parties entitled to participate in a decision or vote on a matter, or the absence of any objection from any relevant party to participate in a decision or vote in a matter. For greater certainty, if a party that is entitled to participate in a decision or vote on a matter abstains from such participation or vote, the abstention will not prevent a consensus.

2.27.2 Please provide an example to demonstrate a matter being considered by the Oversight group when consensus is reached.

**RESPONSE:**

**Please refer to BC Hydro's response to BCUC IR 2.27.1.**

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**27.0 Reference: British Columbia Reliability Coordinator Oversight Group  
Exhibit B-10, Attachment 2, p. 1  
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BC Hydro's TOROG states:

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2.27.3 Please confirm or otherwise explain that BC Hydro would be entitled to only one vote on any matter being considered by the Oversight Group.

**RESPONSE:**

**Confirmed. BC Hydro is entitled to only one vote on any matter being considered by the Oversight Group.**

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**27.0 Reference: British Columbia Reliability Coordinator Oversight Group  
Exhibit B-10, Attachment 2, p. 1  
Membership**

BC Hydro's TOROG states:

Decisions of the Oversight Group will be made by consensus of all members present at a meeting (including members present at the meeting by conference call) considering the applicable decision unless this Terms of Reference specifies otherwise. Where used in this Terms of Reference, 'consensus' will mean either positive agreement of all relevant parties entitled to participate in a decision or vote on a matter, or the absence of any objection from any relevant party to participate in a decision or vote in a matter. For greater certainty, if a party that is entitled to participate in a decision or vote on a matter abstains from such participation or vote, the abstention will not prevent a consensus.

2.27.4 Please explain if the BCRC will be reviewing all matters considered by the Oversight Group with or without consensus reached by members. Please explain your response.

**RESPONSE:**

**Yes, the BCRC will be reviewing all matters considered by the Oversight Group because the Oversight Group's role is to provide input and guidance to BCRC management on matters relating to the BCRC's performance of the RC function.**

**Section VI of the TOROG states:**

**"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 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."**

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**28.0 Reference: British Columbia Reliability Coordinator Oversight Group  
Exhibit B-10, Attachment 2, p. 3  
Process for Resolving Disputes**

BC Hydro's TOROG states:

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 a consensus of all members of the Oversight Group present at a meeting of the Oversight Group (including members present at the meeting by conference call), 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.

2.28.1 Please confirm whether BC Hydro's representatives in the oversight committee may also be part of the BCRC?

**RESPONSE:**

**BC Hydro intends for its representatives to the RC Oversight Group to be staff who are not performing the RC function.**

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**28.0 Reference: British Columbia Reliability Coordinator Oversight Group  
Exhibit B-10, Attachment 2, p. 3  
Process for Resolving Disputes**

BC Hydro's TOROG states:

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 a consensus of all members of the Oversight Group present at a meeting of the Oversight Group (including members present at the meeting by conference call), 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.

2.28.1 Please confirm whether BC Hydro's representatives in the oversight committee may also be part of the BCRC?

2.28.1.1 If confirmed, please explain whether this creates an imbalance of power in the mechanisms proposed for resolving disputes.

**RESPONSE:**

**Please refer to BC Hydro's response to BCUC IR 2.28.1.**

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**29.0 Reference: British Columbia Reliability Coordinator Oversight Group  
Exhibit B-10, Attachment 2, p. 3  
Process for Resolving Disputes**

BC Hydro's TOROG states:

If the BCRC has determined not to implement a proposal adopted by a consensus of 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 (including members present at the meeting by conference call) 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.

2.29.1 Please provide a flow chart that fully outlines the entire dispute resolution process. Please also include examples of instances when an independent subject matter expert, Chief Compliance Officer or the BC Hydro Executive Vice President of Operations may be sought for advice on the matter.

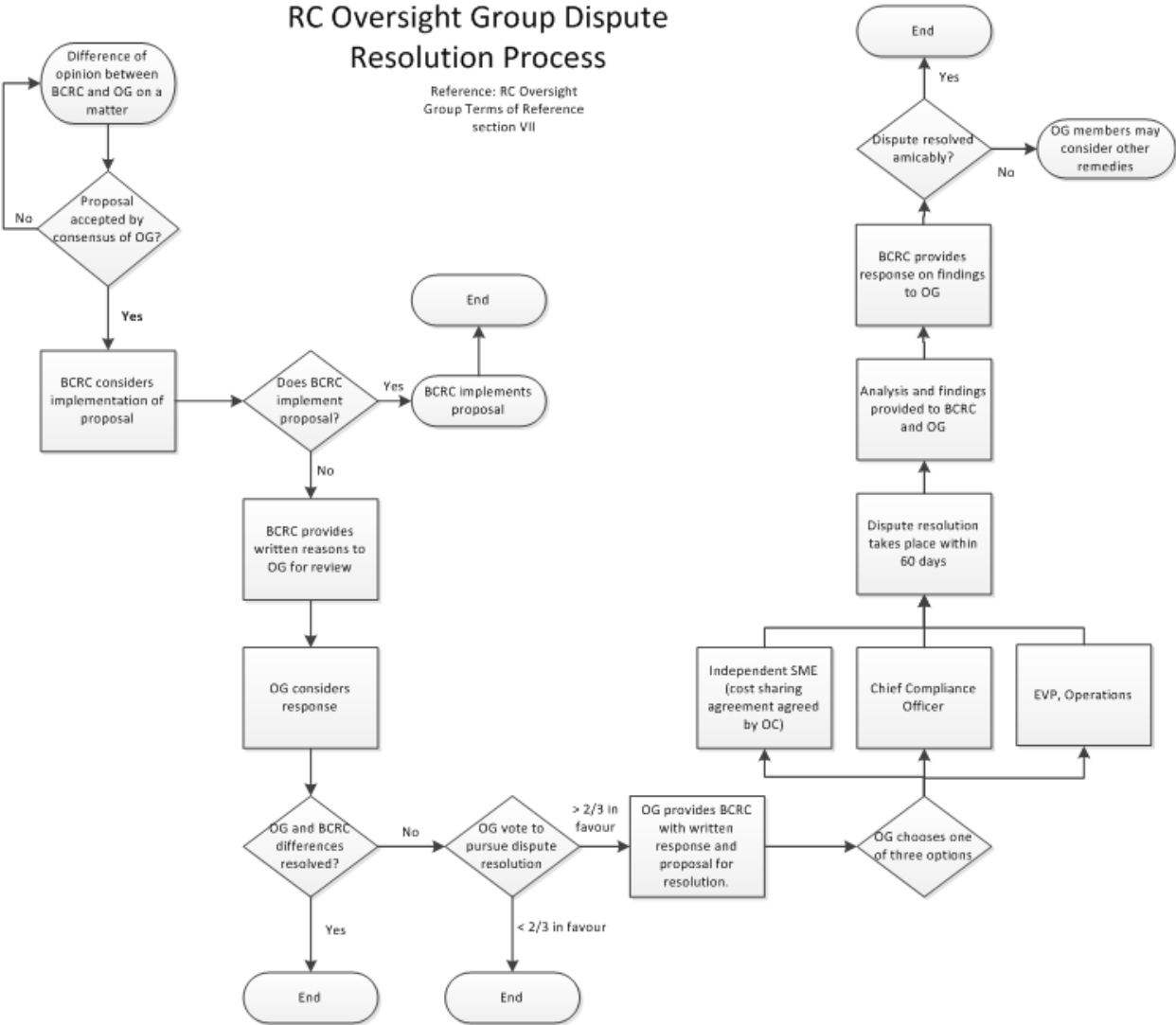
**RESPONSE:**

**Please refer to the attached flowchart that outlines the dispute resolution process as described in section VII Process for Resolving Disputes of the TOROG.**

**Examples of instances when a subject matter expert, Chief Compliance Officer or the BC Hydro Executive Vice President of Operations may be sought for advice on a matter are provided below:**

**Example – A dispute has arisen in regards to policies and procedures that apply to the RC function. The Oversight Group may seek resolution through further review with the BC Hydro Chief Compliance Officer or an independent subject matter expert that has applicable experience.**

**Example – A dispute has arisen in regards to a process or tool that may have financial impacts to the registered entities. The Oversight Group may seek resolution through further review with the BC Hydro Executive Vice President of Operations or an independent subject matter expert.**





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2.29.2 If disputes cannot be resolved amicably, please confirm whether these disputes will be referred to the BCUC for adjudication. Please explain.

**RESPONSE:**

**If a dispute cannot be resolved and the dispute relates to a subject matter within the BCUC's jurisdiction, the dispute may be referred to the BCUC for a decision.**

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**30.0 Reference: British Columbia Reliability Coordinator Oversight Group  
Exhibit B-10, Attachment 2, p. 4  
Process for Resolving Disputes**

BC Hydro's TOROG states: "Claims or disputes asserting that the 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."

2.30.1 Please explain the mechanisms that will be implemented in resolving disputes arising from claims asserting that the BCRC/BC Hydro was not in compliance with the MRS or claims that BC Hydro failed to perform a specific task or function required of a Reliability Coordinator under MRS.

**RESPONSE:**

**Claims of non-compliance with MRS may be dealt with by the BCUC, in accordance with the *Utilities Commission Act* and the British Columbia Utilities Commission Rules of Procedure for Reliability Standards in British Columbia.**

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**31.0 Reference: British Columbia Reliability Coordinator Oversight Group  
Exhibit B-10, Attachment 2, p. 5  
Modifications to Terms of Reference**

BC Hydro's TOROG states:

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 members 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 by consensus. 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.

2.31.1 Upon finalization of any future amendments to the terms of reference, please confirm whether BC Hydro will be submitting these documents for BCUC's approval.

**RESPONSE:**

**BC Hydro is not submitting the Oversight Group and Working Group terms of reference for BCUC approval, nor does it anticipate seeking BCUC approval for any future amendments.**

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Exhibit B-10, Attachment 2, p. 5  
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2.31.1 Upon finalization of any future amendments to the terms of reference, please confirm whether BC Hydro will be submitting these documents for BCUC's approval.

2.31.1.1 Would this also apply to the RC SoC?

**RESPONSE:**

**BC Hydro is not submitting the RC SoC for BCUC approval, nor does it anticipate seeking BCUC approval for any future amendments.**

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**31.0 Reference: British Columbia Reliability Coordinator Oversight Group  
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2.31.1 Upon finalization of any future amendments to the terms of reference, please confirm whether BC Hydro will be submitting these documents for BCUC's approval.

2.31.1.2 If BC Hydro does not intend to seek BCUC's approval, please confirm if BC Hydro intends to file any revisions of the TOROG and RC SoC and other relevant documents to the BCUC for information purposes. Please explain.

**RESPONSE:**

**BC Hydro confirms that it will file with the BCUC revisions to the RC SoC, and Terms of Reference for the Oversight Group and its working group(s), for informational purposes.**

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**32.0 Reference: Oversight Group and Operations Working Group  
 Exhibit C2-5, FortisBC Inc. Submission on Four Key  
 Documents, p. 2**

FortisBC Inc. (FortisBC) in its letter dated April 15, 2019 (Exhibit C2-5) stated that:

If at the conclusion of this regulatory process the BCUC approves BC Hydro's registration as Reliability Coordinator, it is possible that once tested in practice the April 10 Documents (or aspects of them) may not work well, or may work in unanticipated ways, FBC and/or others could well have comments to make on the documents at that stage. The terms of reference provide for periodic review (by, as applicable, the Oversight Group and Operations Working Group) and there may also be benefit in the BCUC convening a later process to see whether matters are working well.

- 2.32.1 Please confirm that BC Hydro is supportive of FortisBC's proposal for BCUC to convene a process at a later stage to review the effectiveness of the Oversight Group and Operations Working Group to ensure all system users of the interconnected transmission systems are treated in a fair and non-discriminatory manner.

**RESPONSE:**

**BC Hydro does not believe it is necessary for the BCUC to convene a further process or timetable to review the effectiveness of the Oversight Group and Operations Working Group at this time.**

**The terms of reference provide for periodic review (by, as applicable, the Oversight Group and Operations Working Group) to determine whether any revisions may be warranted. This review process may address unanticipated consequences or other proposed changes to be reviewed and approved by the Oversight Group and the BCRC.**

**In addition, a BCUC staff representative is invited to participate in meetings of the Oversight Group and will have an opportunity to provide input and feedback on any proposed changes to the terms of reference as part of the review process.**

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2.32.2 If so, please outline any future processes that BC Hydro believes would be an appropriate forum for BCUC to conduct such a review.

**RESPONSE:**

**Please refer to BC Hydro's response to BCUC IR 2.32.1.**