

Fred James

Chief Regulatory Officer

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July 30, 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
Confirmation of Completion of Bucket 2 Items to BCUC and Registered
Interveners**

BC Hydro writes pursuant to BCUC Order No. G-158-19 to confirm completion of all Bucket 2 items to the BCUC and registered interveners.

Background

During the on-site visit conducted by the Western Electricity Coordinating Council (**WECC**) Certification Team (**CT**) in May 2019, the WECC CT identified a number of "Bucket 2 items" that had to be completed by BC Hydro prior to it recommending BC Hydro's full certification.

The Bucket 2 items were listed in Attachment 3 to the WECC Reliability Coordinator Certification Report (the **WECC Report**), which was filed for information purposes as Attachment 1 to BC Hydro's July 4, 2019 correspondence (Exhibit B-13). Since the on-site visit in May 2019, BC Hydro worked towards completion of all Bucket 2 items and confirms that it submitted its final item for review and confirmation to the WECC CT on Monday, July 29, 2019.

Status of Bucket 2 Items

The below table provides a summary of the Bucket 2 items including BC Hydro's date of completion and date of submittal to the WECC CT for confirmation of completion.

Bucket 2 Item No.	BC Hydro Date of Completion/Date of Submittal by BC Hydro to WECC CT for Confirmation of Completion
Item 1: categorize the RC workstations as BES Cyber Assets given the BES reliability operating services they support and the integral role these workstations will play in the real -time operations of the RC Control Center	BC Hydro completed item 1 on July 15, 2019 and provided evidence of completion to the WECC CT on July 23, 2019
Item 2: include voltage limit (PU) guidance in the SOL Methodology	BC Hydro completed item 2 on July 12, 2019 and provided evidence of completion to the WECC CT on July 12, 2019
Item 3: expand restoration Reliability Related Tasks to include synchronization training	BC Hydro completed item 3 on July 8, 2019, and provided evidence of completion to the WECC CT on July 12, 2019
Item 4: update the IRO -002 documentation to include testing the data infrastructure within the control center	BC Hydro completed item 4 on July 26, 2019 and provided evidence of completion to the WECC CT on July 29, 2019
Item 5: provide "final" copies of all procedures that have been submitted for the RC certification	BC Hydro completed item 5 on July 12, 2019 and provided evidence of completion to the WECC CT on July 12, 2019
Item 6: provide executed copies of the RC-RC agreements with PEAK RC and AESO	BC Hydro completed item 6 on July 17, 2019 and provided evidence of completion to the WECC CT on July 23, 2019

Bucket 2 Item No.	BC Hydro Date of Completion/Date of Submittal by BC Hydro to WECC CT for Confirmation of Completion
<p>Item 7: provide the following training documents prior to shadow operations: (a) final task list for support personnel; (b) evidence that task qualification has been completed for RC operators and support personnel; and (c) provide NERC credentials for all RC operators</p>	<p>BC Hydro completed item 7(a) on July 17, 2019 and provided evidence of completion to the WECC CT on July 23, 2019</p> <p>BC Hydro completed item 7(b) on July 29, 2019 and provided evidence of completion to the WECC CT on July 29, 2019</p> <p>BC Hydro completed item 7(c) on May 31, 2019 and provided evidence of completion to the WECC CT on July 12, 2019</p>
<p>Item 8: provide the following documentation for IRO-010: (a) completed "Attachment 2"; (b) evidence the data request has been sent to all applicable entities (e.g., neighbouring RC's, TOPs); and (c) evidence the data mapping has been completed</p>	<p>BC Hydro completed item 8(a) on July 12, 2019 and provided evidence of completion to the WECC CT on July 12, 2019</p> <p>BC Hydro completed item 8(b) on July 17, 2019 and provided evidence of completion to the WECC CT on July 23, 2019</p> <p>BC Hydro completed item 8(c) on July 22, 2019 and provided evidence of completion to the WECC CT on July 23, 2019</p>

BC Hydro has been in discussion with WECC with respect to the confirmation process and has been advised by WECC that they are aware of the BCUC schedule and are working towards confirmation of completion to avoid delay. In order to maintain the schedule, BC Hydro is of the view that confirmation by WECC of completion of the remaining Bucket 2 items must be received by Tuesday August 6, 2019, the date of BC Hydro's final argument being filed. To that end, BC Hydro will stay in contact with WECC and provide further updates with respect to the confirmation process as the information becomes available.

Other Updates

On July 8, 2019, BC Hydro commenced shadow operations with PEAK. Those operations have been going well and have provided opportunities for the B.C. Reliability Coordinator (**BCRC**) personnel to improve their readiness for assuming the RC responsibilities in September 2019.

BC Hydro has been engaging with the registered entities of B.C. to ensure readiness for a September transition to the BCRC as follows:

- Multiple conference calls have been held with BC Hydro BA/TOP and FortisBC TOP to walk through procedures and confirm changes.
- Email update provided to all MRS entities on July 19, 2019.
- Conference calls have been scheduled with MRS entities for July 31, 2019, August 14, 2019 and August 28, 2019 to report on updates, summarize the role of the BCRC and any expected changes.
- BC Hydro is in the process of establishing the RC website.

BC Hydro has also been working with the current and future RC providers within the Western Interconnection and can report the following:

- RC Coordination agreement has been executed with California ISO (RC West).
- The Western Interconnection Data Sharing Agreement is ready for execution. Detailed discussions continue to take place to prepare for transition of required data from PEAK ahead of their closure in December 2019.

For further information, please contact Geoff Higgins at 604-623-4121 or by email at bchydroregulatorygroup@bchydro.com.

Yours sincerely,



Fred James
Chief Regulatory Officer

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Copy to: BCUC Project No. 1598978 (Application for RC Registration with the MRS Program) Registered Intervener Distribution List.

WECC
Attention: Julie Blair
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