

August 13, 2019

E-Filed

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cferguson@lawsonlundell.comBritish Columbia Utilities Commission  
Sixth Floor - 900 Howe Street  
Vancouver, BC V6Z 2N3Attention: Patrick Wruck, Commission Secretary

Dear Mr. Wruck:

**Re: British Columbia Hydro and Power Authority (BC Hydro)  
Application for Reliability Coordinator (RC) Registration with the Mandatory  
Reliability Standards Program – Project No. 1598978**

BC Hydro writes further to the regulatory timetable established for the above-noted proceeding to provide the below reply submissions to the two intervener arguments filed.<sup>1</sup>

On Friday, August 9, 2019, FortisBC Inc. (**FortisBC**) submitted its final argument where it provided its support for BC Hydro's Application and commented that "there is no evidence that BC Hydro's registration as the RC would not be in the public interest."<sup>2</sup>

In its submissions, FortisBC reiterated its general support for the Governance Documents,<sup>3</sup> the governance framework established by BC Hydro for the role of RC<sup>4</sup> and again requested that BC Hydro establish and convene the initial meetings of the RC Registered Entities Oversight Group and the RC BA/TOP Operations Working Group as soon as reasonably possible in order to facilitate the transition to BC Hydro as the provincial RC.<sup>5</sup> BC Hydro agrees with FortisBC and confirms that BC Hydro will reach out to registered entities upon approval of its registration request to arrange the initial meetings of these groups.

On Monday, August 12, 2019, BCOAPO submitted its final argument and, similar to FortisBC, expressed that in consideration of BC Hydro's technical capability to assume the role of RC and

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<sup>1</sup> Unless stated otherwise, defined terms and acronyms have the same meaning as in BC Hydro's final argument, filed August 6, 2019.

<sup>2</sup> See FortisBC final argument, at paragraph 18.

<sup>3</sup> See FortisBC final argument, at paragraphs 5 and 6 and paragraph 7 for its support of the RC SoC.

<sup>4</sup> See FortisBC final argument, at paragraph 16.

<sup>5</sup> See FortisBC final argument, at paragraph 10.

in the absence of evidence that BC Hydro's registration would not be in the public interest, BC Hydro's Application should be approved.<sup>6</sup>


In its submissions, BCOAPO also reiterated its support for the Governance Documents developed during the consultation process and its adoption of FortisBC's position on public interest issues.<sup>7</sup> However, on page 2 of its submissions, BCOAPO suggests that it would not object to adjustment(s) of the Governance Documents by the Commission if deemed necessary. BCOAPO further provides that it may be appropriate to include a provision in the RC SoC requiring the RC to provide a copy of the annual report outlining any deviations from the RC SoC to the BCUC.

While BC Hydro made certain minor adjustments to the Governance Documents in response to some suggestions by the BCUC in its IRs, it does not agree with the suggestion by BCOAPO that the BCUC adjust the Governance Documents generally or in the specific manner suggested. As BC Hydro has already provided, it is not seeking Commission approval of any of the Governance Documents nor does it anticipate seeking approval for any future amendments. As noted by BCOAPO and confirmed by BC Hydro in its IR response, BC Hydro will be posting a copy of the annual report on the RC website and has stated that it does not object to providing the BCUC with a copy of the annual report for information purposes.<sup>8</sup> As such, BCOAPO's suggestion would appear both duplicative and unnecessary.

In light of the overall support from both FortisBC and BCOAPO of its Application, BC Hydro reiterates its request that the Commission issue its final order accepting its registration application and register BC Hydro as the RC for B.C. as soon as possible and with an effective date of September 2, 2019, to ensure a smooth transition by BC Hydro to the performance of the RC function.

Yours very truly,

LAWSON LUNDELL LLP



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<sup>6</sup> See BCOAPO final argument, at page 2.

<sup>7</sup> See BCOAPO final argument, at page 1.

<sup>8</sup> See BC Hydro's response to BCUC IR 2.24.1.