

**Fred James**

Chief Regulatory Officer

Phone: 604-623-4046

Fax: 604-623-4407

[bchydroregulatorygroup@bchydro.com](mailto:bchydroregulatorygroup@bchydro.com)

August 12, 2020

Ms. Marija Tresoglavic  
Acting Commission Secretary and Manager  
Regulatory Support  
British Columbia Utilities Commission  
Suite 410, 900 Howe Street  
Vancouver, BC V6Z 2N3

Dear Ms. Tresoglavic:

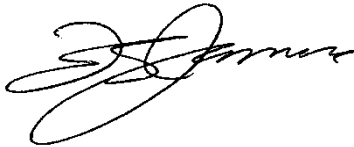
**RE: Project No. 1599103  
British Columbia Utilities Commission (BCUC or Commission)  
British Columbia Hydro and Power Authority (BC Hydro)  
Mandatory Reliability Standards (MRS) Assessment Report No. 13 (Report)  
Addressing Reliability Standards for Adoption in British Columbia  
Responses to BCUC Information Request No. 1**

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BC Hydro writes in compliance with BCUC Order No. R-10-20 to provide, as Exhibit B-3, its responses to BCUC Information Request No. 1.

For further information, please contact Chris Sandve at 604-974-4641 or by email at [bchydroregulatorygroup@bchydro.com](mailto:bchydroregulatorygroup@bchydro.com).

Yours sincerely,



Fred James  
Chief Regulatory Officer

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Enclosure

<b>British Columbia Utilities Commission</b> Information Request No. <b>1.1.1</b> Dated: <b>July 31, 2020</b> British Columbia Hydro & Power Authority Response issued <b>August 12, 2020</b>	Page 1 of 1
British Columbia Hydro & Power Authority <b>Mandatory Reliability Standards (MRS) Assessment  Report No. 13</b>	<b>Exhibit:  B-3</b>

**1.0 TPL-007-3**

**Reference: Special Considerations  
Exhibit B-1, Section 2.1, pp. 2–3  
Reliability Standards with Reliability Requirements for  
Planning Authority (PA)/Planning Coordinator (PC) Functions**

In British Columbia Hydro and Power Authority’s (BC Hydro) Mandatory Reliability Standards (MRS) Assessment Report No. 13 (Report), page 3 states “BC Hydro recommends that the TPL-007-3 Revised Standard be ordered by the BCUC to be held in abeyance and be of no force or in effect in B.C. until the PC matter is resolved.”

Footnote 2 on page 2 of the Report states:

The TPL-007-3 Revised Standard includes a new Variance for Canadian registered entities. This Variance provides an option by which Canadian registered entities may leverage operating experience, observed Geomagnetic Disturbance (GMD) effects, and ongoing research to define alternative benchmark GMD events or supplemental GMD planning event(s) for their GMD Vulnerability Assessments. This Variance also recognizes the unique regulatory frameworks specific to Canadian jurisdictions, particularly with respect to provincial processes for approving investments identified in Corrective Action Plans.

1.1.1 Please describe to what standard or how BC Hydro is currently managing for potential GMD events while TPL-007-3 is held in abeyance.

**RESPONSE:**

**To manage GMD events while the TPL-007 standard is held in abeyance, BC Hydro has an existing System Operating Order which describes the phenomena associated with geomagnetic disturbances, their impact on power system operation, and operating procedures to follow during such disturbances. This System Operating Order complies with the MRS standard EOP-010-1 Geomagnetic Disturbance Operations.**

**For transmission system planning purposes BC Hydro has been working with the WECC GMD study working group to assess potential Geomagnetically Induced Currents (GIC) under certain extreme conditions. BC Hydro has submitted its system modeling data to WECC for GMD studies and attends WECC GMD study working group meetings. BC Hydro is in the process of refining its GMD modeling and will continue with further studies to identify any potential GMD vulnerabilities.**

<b>British Columbia Utilities Commission</b> Information Request No. <b>1.2.1</b> Dated: <b>July 31, 2020</b> British Columbia Hydro & Power Authority Response issued <b>August 12, 2020</b>	Page 1 of 1
British Columbia Hydro & Power Authority <b>Mandatory Reliability Standards (MRS) Assessment</b> <b>Report No. 13</b>	<b>Exhibit:</b> <b>B-3</b>

## 2.0 MRS Recommended Effective Dates

**Reference: Assessment of Individual Standards  
Exhibit B-1, Section 5.3, p. 21; BC Hydro MRS Assessment  
Report No. 12 Addressing Reliability Standards for Adoption  
in British Columbia, BCUC Order R-21-19, Attachment A, p. 1;  
Attachment D-1, p. 3  
Recommended Effective Dates**

Table 3 on page 21 of the Report, BC Hydro's consolidated recommended effective date for CIP-003-8, states:

Coincide with BC CIP-003-7 Implementation Plan effective dates. In connection with the recommendation to adopt the standard, BC Hydro recommends that a BC specific CIP-003-8 Implementation Plan be incorporated into the BC MRS program pursuant to an order of the BCUC providing for the administration of adopted reliability standards.

By British Columbia Utilities Commission (BCUC) Order R-21-19, the effective date for CIP-003-7 is October 1, 2019 and the CIP-003-7 Implementation Plan included as Attachment D-1 contains the phased-in effective dates for the following requirements:

- R1, Parts 1.2.2 and 1.2.3 and R2 (Att. 1, Sec 2 & 3) - October 1, 2023
- R1, Parts 1.2.5 and 1.2.6 and R2 (Att. 1, Sec. 1, 4 & 5) – October 1, 2021

1.2.1 Please clarify whether BC Hydro recommends that CIP-003-8 be effective immediately after BCUC adoption and, if so, does BC Hydro consider the first day of the first quarter after adoption to also be appropriate.

### RESPONSE:

**BC Hydro confirms that it recommends CIP-003-8 be effective immediately after BCUC adoption with the exceptions for initial compliance. The exceptions for initial compliance are outlined in the BCUC Implementation Plan for CIP-003-8 as provided in Appendix D – Attachment D-1 of the Application. BC Hydro considers the first day of the first quarter after adoption to also be appropriate with the exceptions as noted above.**

<b>British Columbia Utilities Commission</b> Information Request No. <b>1.2.2</b> Dated: <b>July 31, 2020</b> British Columbia Hydro & Power Authority Response issued <b>August 12, 2020</b>	Page 1 of 1
British Columbia Hydro & Power Authority <b>Mandatory Reliability Standards (MRS) Assessment</b> <b>Report No. 13</b>	<b>Exhibit:</b> <b>B-3</b>

## 2.0 MRS Recommended Effective Dates

**Reference: Assessment of Individual Standards**  
**Exhibit B-1, Section 5.3, p. 21; BC Hydro MRS Assessment**  
**Report No. 12 Addressing Reliability Standards for Adoption**  
**in British Columbia, BCUC Order R-21-19, Attachment A, p. 1;**  
**Attachment D-1, p. 3**  
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- R1, Parts 1.2.5 and 1.2.6 and R2 (Att. 1, Sec. 1, 4 & 5) – October 1, 2021

1.2.2 Please clarify whether BC Hydro recommends the above phased-in effective dates for CIP-003-8.

**RESPONSE:**

**Confirmed.**

<b>British Columbia Utilities Commission</b> Information Request No. <b>1.2.3</b> Dated: <b>July 31, 2020</b> British Columbia Hydro & Power Authority Response issued <b>August 12, 2020</b>	Page 1 of 1
British Columbia Hydro & Power Authority <b>Mandatory Reliability Standards (MRS) Assessment</b> <b>Report No. 13</b>	<b>Exhibit:</b> <b>B-3</b>

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**Reference: Assessment of Individual Standards  
Exhibit B-1, Section 5.3, p. 21; BC Hydro MRS Assessment  
Report No. 12 Addressing Reliability Standards for Adoption  
in British Columbia, BCUC Order R-21-19, Attachment A, p. 1;  
Attachment D-1, p. 3  
Recommended Effective Dates**

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Coincide with BC CIP-003-7 Implementation Plan effective dates. In connection with the recommendation to adopt the standard, BC Hydro recommends that a BC specific CIP-003-8 Implementation Plan be incorporated into the BC MRS program pursuant to an order of the BCUC providing for the administration of adopted reliability standards.

By British Columbia Utilities Commission (BCUC) Order R-21-19, the effective date for CIP-003-7 is October 1, 2019 and the CIP-003-7 Implementation Plan included as Attachment D-1 contains the phased-in effective dates for the following requirements:

- R1, Parts 1.2.2 and 1.2.3 and R2 (Att. 1, Sec 2 & 3) - October 1, 2023
- R1, Parts 1.2.5 and 1.2.6 and R2 (Att. 1, Sec. 1, 4 & 5) – October 1, 2021

1.2.3 Please discuss any negative impacts or risks, if any, that would result in CIP-003-8 adopting the same implementation timeline as CIP-003-7.

### RESPONSE:

**There are no negative impacts or risks resulting from adopting the same implementation timeline as CIP-003-7 for CIP-003-8. No additional time is required to become compliant because the only material revision within CIP-003-8 is in relation to Requirement 2, Attachment 1, section 5.2.2 which gives entities the flexibility to determine if any additional mitigation actions are necessary.**

<b>British Columbia Utilities Commission</b> Information Request No. <b>1.3.1</b> Dated: <b>July 31, 2020</b> British Columbia Hydro & Power Authority Response issued <b>August 12, 2020</b>	Page 1 of 3
British Columbia Hydro & Power Authority <b>Mandatory Reliability Standards (MRS) Assessment</b> <b>Report No. 13</b>	<b>Exhibit:</b> <b>B-3</b>

### 3.0 B. MRS RECOMMENDED EFFECTIVE DATES

**Reference: Assessment of Individual Standards  
 Exhibit B-1, Section 5.3, pp. 21–24; Appendix C-3, pp. 1-12  
 Recommended Effective Dates**

In the Report, Table 3 on pages 21 to 23 details recommended effective dates for each of the standards along with recommendations from BC Hydro and other stakeholders. Appendix C-3 on pages 1 to 12 of the Report provides information on the United States (US) implementation times and enforcement dates that the Federal Energy Regulatory Commission (FERC) has for each standard. A summary of the information is provided in the BCUC Staff Table 1 below:

BCUC Staff Table 1: Summary of Differences in Recommended Effective Dates			
Standard	BC Hydro Recommended Effective Date	Feedback Exceptions to Recommended Effective Date	FERC Approved Standard/Requirement Implementation Time Provided and US Enforcement Date
CIP-005-6	First day of first calendar quarter, 30 months after BCUC adoption.	<b>BC Hydro</b> – First day of first calendar quarter, 24 months after BCUC adoption <b>Coast Mountain Hydro Limited Partnership (CMHL)</b> - R1: No change to standard, no additional time required to implement; R2: Implementation target for October 1, 2021 <b>Fortis BC Inc. (FBC)</b> - Recommended that CIP-005-6 CIP-010-3, and CIP-013-1 have the same effective date 24–36 months after BCUC approval	Implementation Time: First day of the first calendar quarter that is 18 months following applicable regulatory approval US Enforcement Date: October 1, 2020 (three month delay due to COVID-19; original enforcement date: July 1, 2020)
CIP-008-6	First day of first calendar quarter, 30 months after BCUC adoption.	<b>BC Hydro</b> – First day of first calendar quarter, 18 months after BCUC adoption <b>CMHL</b> - Implementation target for October 1, 2021 <b>FBC</b> – Recommended effective date is 24–36 months after BCUC approval	Implementation Time: First day of the first calendar quarter that is 18 months following applicable regulatory approval US Enforcement Date: January 1, 2021

<b>British Columbia Utilities Commission</b> Information Request No. <b>1.3.1</b> Dated: <b>July 31, 2020</b> British Columbia Hydro & Power Authority Response issued <b>August 12, 2020</b>	Page 2 of 3
British Columbia Hydro & Power Authority <b>Mandatory Reliability Standards (MRS) Assessment</b> <b>Report No. 13</b>	<b>Exhibit:</b> <b>B-3</b>

BCUC Staff Table 1: Summary of Differences in Recommended Effective Dates			
Standard	BC Hydro Recommended Effective Date	Feedback Exceptions to Recommended Effective Date	FERC Approved Standard/Requirement Implementation Time Provided and US Enforcement Date
CIP-010-3	First day of first calendar quarter, 30 months after BCUC adoption.	<b>BC Hydro</b> – First day of first calendar quarter, 24 months after BCUC adoption <b>CMHL</b> - Implementation target for October 1, 2021 <b>FBC</b> – Recommended that CIP-005-6 CIP-010-3, and CIP-013-1 have the same effective date 24–36 months after BCUC approval	Implementation Time: First day of the first calendar quarter that is 18 months following applicable regulatory approval US Enforcement Date: October 1, 2020 (three month delay due to COVID-19; original enforcement date: July 1, 2020)
CIP-013-1	First day of first calendar quarter, 30 months after BCUC adoption.	<b>BC Hydro</b> – First day of first calendar quarter, 24 months after BCUC adoption <b>CMHL</b> - Implementation target for October 1, 2021 <b>FBC</b> – Recommended that CIP-005-6 CIP-010-3, and CIP-013-1 have the same effective date 24–36 months after BCUC approval	Implementation Time: First day of the first calendar quarter that is 18 months following applicable regulatory approval US Enforcement Date: October 1, 2020 (three month delay due to COVID-19; original enforcement date: July 1, 2020)

1.3.1 Given that FERC has provided an 18 month implementation timeline for entities in the US, please provide the justification for BC Hydro’s recommendation for a 30 month implementation timeline after BCUC adoption for each CIP-005-6, CIP-008-6, CIP-010-3 and CIP-013-1.

**RESPONSE:**

To clarify, FERC’s 18-month implementation timeline does not include the three months of COVID-19 relief. With the three-month delay due to COVID-19, U.S. entities are given 21-months to implement the standards. The recommended 30-month implementation timeline in the Application includes six-months of COVID relief in B.C. The COVID-19 relief is related to safety and health measures as described in section 2.3 of the Application. The 24-months, absent the six-month buffer, was based on BC Hydro and entity feedback.

<b>British Columbia Utilities Commission</b> Information Request No. <b>1.3.1</b> Dated: <b>July 31, 2020</b> British Columbia Hydro & Power Authority Response issued <b>August 12, 2020</b>	Page 3 of 3
British Columbia Hydro & Power Authority <b>Mandatory Reliability Standards (MRS) Assessment</b> <b>Report No. 13</b>	<b>Exhibit:</b> <b>B-3</b>

In addition, BC Hydro notes that the CIP-005-6, CIP-010-3, and CIP-013-1 standards were adopted by FERC order in October 2018 and CIP-008-6 by FERC order in June 2019. Accordingly, U.S. entities will have likely engaged in significant work to develop the necessary processes and procedures in anticipation of the effective dates prior to COVID-19. B.C. entities have yet to begin this work as the above standards have yet to be adopted by the BCUC. It is reasonable therefore to allow B.C. entities the additional six months due to COVID-19 uncertainties.

BC Hydro recognized that there are significant uncertainties regarding the duration of COVID-19. NERC's motion for deferral also recognized that there are significant uncertainties regarding the duration of the outbreak and the subsequent recovery. As such, NERC will continue to evaluate the circumstances to determine whether additional implementation delays may be warranted.