

**Fred James**  
Chief Regulatory Officer  
Phone: 604-623-4046  
Fax: 604-623-4407  
[bhydroregulatorygroup@bchydro.com](mailto:bhydroregulatorygroup@bchydro.com)

July 7, 2020

Via email:

**To: Registered Entities in the Mandatory Reliability Standards Program**

**RE: British Columbia Utilities Commission (BCUC or Commission)  
British Columbia Hydro and Power Authority (BC Hydro)  
Mandatory Reliability Standards (MRS) North American Electric Reliability  
Corporation (NERC) COVID-19 Compliance Response  
Compliance with BCUC Order No. R-13-20 Directive 2**

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BC Hydro writes in compliance with Directive 2 of BCUC Order No. R-13-20 (the **Order**) to notify each entity registered in the MRS Program that the BCUC has established a regulatory process to review BC Hydro's assessment of NERC's proposed delayed effective dates.

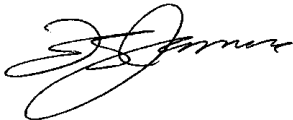
A copy of the Order, including the regulatory timetable establishing a written process, is provided in Attachment 1 and is also posted as Exhibit A-2 on the BCUC website at this [link](#).

BC Hydro placed a copy of its assessment on its website at:  
<https://www.bchydro.com/content/dam/BCHydro/customer-portal/documents/corporate/regulatory-planning-documents/regulatory-filings/reports/2020-06-17-bchydro-covid-19-compliance-bcuc.pdf>.

B.C. Registered Entities are requested to submit written comments to the BCUC and BC Hydro by July 10, 2020.

For further information, please contact the undersigned.

Yours sincerely,



Fred James  
Chief Regulatory Officer

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Enclosure (1)

...2/

July 7, 2020

Via email:

To: Registered Entities in the Mandatory Reliability Standards  
Program

Mandatory Reliability Standards (MRS) North American Electric Reliability  
Corporation (NERC) COVID-19 Compliance Response  
Compliance with BCUC Order No. R-13-20 Directive 2



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Copy to:

**BCUC**

Attention: Marija Tresoglavic  
commission.secretary@bcuc.com

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**Mandatory Reliability Standards**  
**NERC COVID-19 Compliance Response**  
**Compliance with BCUC Order No. R-13-20 Directive 2**

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**Attachment 1**  
**BCUC Order No. R-13-20**



**ORDER NUMBER  
R-13-20**

IN THE MATTER OF  
the *Utilities Commission Act*, RSBC 1996, Chapter 473

and

British Columbia Hydro and Power Authority  
Mandatory Reliability Standard Assessment North American Electric Reliability Corporation  
COVID-19 Compliance Response

**BEFORE:**

W. M. Everett, QC, Panel Chair  
E. B. Lockhart, Commissioner

on July 2, 2020

**ORDER**

**WHEREAS:**

- A. On June 17, 2020, British Columbia Hydro and Power Authority (BC Hydro) submitted to the British Columbia Utilities Commission (BCUC), its assessment of the proposed delayed effective dates for fourteen Mandatory Reliability Standards (MRS) identified by the North American Electric Reliability Corporation (NERC) in an informational letter to the BCUC dated April 24, 2020 (NERC Letter) (Report). In the Report, BC Hydro recommended delaying the effective dates for six of the fourteen MRS that currently have implementation dates in British Columbia (BC) in the second half of 2020, due to the impacts of the COVID-19 pandemic;
- B. On March 18, 2020, the United States (US) Federal Energy Regulatory Commission (FERC) and NERC provided industry guidance to ensure grid reliability amid potential COVID-19 impacts (Guidance);
- C. On March 19, 2020, the BCUC issued Letter L-11-20 to all Entities registered with the British Columbia Mandatory Reliability Standards Program (MRS Program), advising that the BCUC is using regulatory discretion that aligns with measures in the Guidance, and that the BCUC will consider the impact of the COVID-19 outbreak for specific aspects of compliance with MRS, as specified in Letter L-11-20. Letter L-11-20 included Direction to ensure Bulk Electric System (BES) reliability amid potential COVID-19 virus impacts and related compliance with MRS;
- D. On April 6, 2020, NERC filed a motion with FERC to defer the implementation, by three to six months, of reliability standards scheduled to become effective in whole or in part during the second half of 2020 (Motion). FERC granted that Motion on April 17, 2020;
- E. In the NERC Letter, NERC indicated registered entities in the US were granted deferral of three to six months for reliability standards with implementation dates scheduled to become effective in the US in the second

half of 2020 and suggested the BCUC also consider a three to six month delay for fourteen MRS scheduled to go into effect in the second half of 2020 in BC;

- F. Aware of the Motion and in connection with the NERC Letter, and in consideration of its responsibilities outlined in the *Utilities Commission Act* (UCA) to assess reliability standards including effective dates in BC, BC Hydro sent a request for feedback to Registered Entities in the MRS Program requesting them to comment on the deferral of effective dates of MRS identified in the NERC Letter; and
- G. Pursuant to section 125.2(5) of the UCA, if the BCUC receives a report under section 125.2(3) of the UCA, the BCUC must make the report available to the public in a reasonable manner, and for a reasonable period of time and consider any comments in response to the report.

**NOW THEREFORE** pursuant to sections 58 to 61 of the UCA, the BCUC orders as follows:

- 1. A written comment process is established for the review of the Report in accordance with the Regulatory Timetable as set out in Appendix A to this order.
- 2. BC Hydro is directed to have the Report available on its external website and notify all Entities registered in the British Columbia Mandatory Reliability Standards Program of the review process by providing them with a copy of this order and/or the link on the BCUC's website within five business days of the date of this order.

**DATED** at the City of Vancouver, in the Province of British Columbia, this                    2nd                    day of July 2020.

BY ORDER

*Original Signed By:*

W. M. Everett, QC  
Commissioner

Attachment

British Columbia Hydro and Power Authority  
Mandatory Reliability Standard Assessment North American Electric Reliability Corporation  
COVID-19 Compliance Response

**REGULATORY TIMETABLE**

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Action	Date (2020)
Written Public and Registered Entities comments to the BCUC and BC Hydro on the COVID-19 Compliance Response	Friday, July 10
BC Hydro Reply Comments	Friday, July 17
BCUC Information Request (IR) No. 1 (if necessary)	Friday, July 24
BC Hydro Responses to BCUC IR No. 1 (if necessary)	Wednesday, August 5
Further Regulatory Process	To Be Determined