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October 11, 2024

Brenda Ambrosi
Manager, Market Policy & Operations
BC Hydro

RE: BC Hydro's Updated Business Practices

Dear Ms. Ambrosi,

Powerex and BC Power Supply (BCPS) appreciate the opportunity to comment on the recent amendments to the "Processing of Short-Term Point-to-Point Transmission Service Requests" and "Processing of Long-Term Firm Point-to-Point Transmission Service Requests" business practices posted on September 26, 2024. We understand that the amended business practices attempt to remediate TSR processing errors, and we have several comments related to the proposed language. Powerex and BCPS offer the following joint comments for consideration.

Firstly, Powerex and BCPS recognize that errors can occur with software or manual interventions, and it is appropriate for BC Hydro to investigate the matter. However, the remediation of the error depends on the situation and the proposed language in Section 5.0 of the Processing of Short-Term PTP Transmission Service Requests (TSRs) business practice appears to take a one size fits all approach when it states "BC Hydro will return the queue back to the state that was last established". A reversion of the entire queue to a previous state may not be an appropriate remedy to an error. As BC Hydro knows, OASIS queue processing does not always appear to be sequential based on Assignment Reference (AREF), because TSRs may remain in a pending state on a particular path while TSRs on another path may continue to be processed. Reverting the entire queue to a state prior to the error would be unnecessary and unwarranted because it would negatively affect unrelated paths.

For example, TSRs on a particular path (e.g. AB-BC), as well as any dependent paths (e.g. AB-US) may be evaluated by the transmission provider and remain queued or received, while TSRs on an unrelated path (US-BC) may continue to be processed even if they are entered later in time. This ensures that processing across all transmission paths is not held up for the processing of a single request on an unrelated path. This common and industry recognized processing of the OASIS queue ensures the first-come, first-served principle of the OATT are maintained, while efficiently processing requests that may

not appear to be sequential based on AREF. We strongly encourage BC Hydro to amend the proposed language to state that the errors may require reversion of some of the TSRs for a particular path(s) in the queue.

Secondly, Powerex and BCPS note that it may not be feasible to revert or re-process the queue after an error has occurred when the TSRs are for an hourly or daily time horizon that may have already started service or is close to starting service. There is a potential time lag associated with an investigation, and it may not be feasible to revert a significant number of TSRs and re-process prior to the start time(s).

Powerex and BCPS suggest that BC Hydro carefully evaluate each situation and determine the feasibility of undertaking manual remediation of the processing. The evaluation must also consider the impacts to transmission customers as a result of the investigation timelines. For example, BC Hydro simply stopping the processing of all transmission requests, either for a day or several days, until an investigation is complete, has material and negative consequences. BC Hydro's bulletin posting on January 23, 2024, related to errors in monthly service request processing on January 22nd, is a perfect example of a situation where BC Hydro could remedy the error prior to the service start time and was able to do so without any impacts to short-term processing of hourly or daily service.

Finally, Powerex and BCPS suggest that the reference towards Section 13.2(a) of the OATT, which only pertains to Long Term PTP requests, is limited, and perhaps this reference should be amended to incorporate OATT Reservation Priority by referencing Section 13.2 and 14.2 instead.

Powerex and BCPS have proposed the following suggested updates to the business practice language, under Section 5.0, to help address the scenarios and concerns raised in our comments above:

5.0 APPROACH TO REMEDYING ERRORS IN TSR PROCESSING

Though rare, technical errors in the automated system and/or manual errors may occur on the processing of TSRs.

Upon discovery of the error, BC Hydro will investigate the issue(s) fully. ~~As appropriate and as practical, BC Hydro shall attempt to address such errors, when appropriate and practicable, while adhering pertaining to the overarching principles of the OATT and, following good utility practices.~~

5.1 Approach to remedying errors that impact the transmissions service queue


In the rare circumstance where an error has been made and ~~the queue sequence is out of order~~ transmission service requests in the queue have been processed incorrectly, (no longer in compliance with OATT 13.2 (a)), BC Hydro will attempt to revert ~~turn~~ the TSRs processed in error to a QUEUED or previous state on OASIS based on reservation priority (as required under OATT 13.2 and 14.2), ~~queue back to the state that was last established at the most recent time of~~

compliance. Depending upon the error, a reversion of TSRs may be required for a particular path and its dependant paths but may not be required on all posted paths, provided BC Hydro has sufficient time to remedy such errors. BC Hydro shall continue to process the TSRs on all paths that are not impacted by the error, and depending upon the error BC Hydro may continue to process requests that are not in the same time horizon of the error.

BC Hydro will evaluate each situation on a case-by-case basis. There may be cases or instances of short-term processing of Hourly or Daily requests where reversion of the queue processing may not be feasible. It may be infeasible because, for example, TSRs may have already started service or the number of TSRs to revert and re-process is significant such that the issue cannot be remedied in a timely manner. In the case where manual intervention is required to approve revert TSRs to a previous state and re-process the queue bring the queue back into compliance, the approval process will first be reviewed and signed-off by a BC Hydro manager. Additionally, BC Hydro will post a transmission bulletin on its website to notify all Transmission Customers of the manual approval/rectification of the queue, with a written explanation, as appropriate.

In closing, Powerex and BCPS appreciate the opportunity to comment, and are open to discussing our comments further to help answer any questions or concerns.

Sincerely,


Raj Hundal

Director, Market Policy and Practices