



March 19, 2020

Sent via email

Letter L-11-20

To: All Entities Registered with the British Columbia Mandatory Reliability Standards Program

Re: COVID-19 – Direction from the British Columbia Utilities Commission to Ensure Bulk Electric System Reliability Amid Potential COVID-19 Virus Impacts and Related Compliance with Mandatory Reliability Standards

The global pandemic COVID-19 is moving quickly and its impact on British Columbians is growing. Accordingly, in response to the current COVID-19 pandemic, and the state of emergency declared in British Columbia, the British Columbia Utilities Commission (BCUC) provides the following guidance to ensure that owners, operators and users of the Bulk Electric System (BES) can focus their resources on keeping people safe and the lights on during this unprecedented public health emergency.

The BCUC is using regulatory discretion that aligns with measures announced by the Federal Energy Regulatory Commission (FERC) and the North American Electric Reliability Corporation (NERC) (attached), to advise all Registered Entities that they will consider the impact of the COVID-19 outbreak in complying with Mandatory Reliability Standards as follows:

- The effects of COVID-19 will be considered an acceptable basis for non-compliance with obtaining and maintaining personnel certification, as required in Reliability Standard PER-003-1 and PER-003-2 (effective April 1, 2020), for the period of March 1, 2020 to December 31, 2020. Registered Entities should notify their Regional Entities and Reliability Coordinators when using system operator personnel that are not NERC-certified.
- The effects of COVID-19 will be considered an acceptable reason, on a case-by-case basis, for delayed periodic data submittals and/or non-compliance with Reliability Standard requirements involving periodic actions that would have been taken between March 1, 2020 and July 31, 2020. Registered entities should notify their Regional Entities of any periodic actions that will be missed during this period.
- Regional Entities will postpone on-site audits, certifications and other on-site activities at least until July 31, 2020. Registered Entities should communicate any resource impacts associated with remote activities to their Regional Entities.

The BCUC recognizes the uncertainties regarding the response to and recovery from the COVID-19 outbreak and will continue to evaluate the situation to determine whether to extend these dates. Our shared goal is to ensure all Registered Entities balance the concerns for the health and welfare of their workforce while staying focused on the mission of maintaining grid reliability and supplying power to consumers across British Columbia.

While this relief is provided, each Entity is expected to make its best effort to comply with Mandatory Reliability Standards applicable to its registered functions and to ensure the reliability of the BES is maintained. Further, given the ever-present risks related to Critical Infrastructure Protection (CIP), Entities are reminded that compliance with CIP standards must remain a high priority of all Entities and that efforts to maintain cyber

protections are critical. Compliance relief will take into account the nature of these efforts on a case-by-case basis.

Sincerely,

Original signed by:

Patrick Wruck
Commission Secretary

Attachment

CAS/ad

cc: Western Electricity Coordinating Council
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