

SIXTH FLOOR, 900 HOWE STREET, BOX 250
VANCOUVER, BC V6Z 2N3 CANADA
web site: <http://www.bcuc.com>



**BRITISH COLUMBIA
UTILITIES COMMISSION**

**ORDER
NUMBER R-53-15**

TELEPHONE: (604) 660-4700
BC TOLL FREE: 1-800-663-1385
FACSIMILE: (604) 660-1102

IN THE MATTER OF
the Utilities Commission Act, R.S.B.C. 1996, Chapter 473

and

**An Implementation Plan for Monitoring Compliance with
British Columbia Reliability Standards in 2016**

BEFORE:

L. F. Kelsey, Commissioner
C. A. Brown, Commissioner
H. G. Harowitz, Commissioner
K. A. Keilty, Commissioner
D. M. Morton, Commissioner

November 19, 2015

O R D E R

WHEREAS:

- A. British Columbia Utilities Commission (Commission) Order G-123-09 approved Rules of Procedure, including the Compliance Monitoring Program (CMP) appended thereto, setting out the administrative framework for monitoring compliance with adopted Reliability Standards in British Columbia and revisions to the CMP were approved by Commission Order R-34-15;
- B. Commission Order G-12-09 appointed the Western Electricity Coordinating Council (WECC) as the Commission's Administrator to assist the Commission in carrying out its functions related to Reliability Standards in the manner described in the Administration Agreement between the WECC and the Commission dated October 8, 2009, and renewed August 21, 2014;
- C. Pursuant to section 3.1 of the CMP, by November 1 of each year, the Administrator will propose an Implementation Plan for the following calendar year for Commission approval. On October 30, 2015, WECC submitted an Extension Request to file the 2016 Implementation Plan by November 16, 2015 and the same day the Commission granted WECC the extension;
- D. On November 13, 2015, WECC proposed an Implementation Plan for the calendar year 2016 (2016 Implementation Plan) for Commission approval, including a list of minimum Reliability Standards to be actively monitored, methods to be used for monitoring, an Audit Plan with Audit Schedule, and Periodic Data Submittal requirements;

**BRITISH COLUMBIA
UTILITIES COMMISSION**

**ORDER
NUMBER** R-53-15

2

- E. Pursuant to section 3.1.3 of the CMP, the approved Implementation Plan is to be posted on the WECC website with appropriate links from the Commission's website; and
- F. The Commission reviewed and considered the 2016 Implementation Plan submitted by WECC and determined that it should be approved.

NOW THEREFORE pursuant to subsection 125.2(10) of the *Utilities Commission Act* and section 3.1 of the Compliance Monitoring Program, the British Columbia Utilities Commission orders as follows:

1. The 2016 Implementation Plan attached as Attachment A to this order is approved.
2. Entities subject to Reliability Standards in British Columbia must comply with the terms of the 2016 Implementation Plan unless otherwise ordered by the Commission.
3. The 2016 Implementation Plan must be posted on the Western Electricity Coordinating Council's website with links from the Commission's website throughout the calendar year 2016.
4. As new and revised standards are approved by the Commission and become effective in British Columbia, the revised and additional standards may be added to the Actively Monitored Standards List for monitoring in the same manner as the standards and requirements they are replacing. The Western Electricity Coordinating Council may make minor changes to schedules or monitoring as required.

DATED at the City of Vancouver, in the Province of British Columbia, this 20th day of November 2015.

BY ORDER

Original signed by:

D. M. Morton
Commissioner

Attachment



British Columbia Utilities Commission (BCUC)

Western Electricity Coordinating Council (WECC)

2016 Implementation Plan for Monitoring Compliance with British Columbia Reliability Standards

November 13, 2015

Table of Contents

| | |
|--|-----------|
| 1. Introduction and Context | 3 |
| 2. Compliance Monitoring Program Administrator (WECC) | 4 |
| 2.1 <i>WECC Operating Area</i> | <i>4</i> |
| 3. 2016 Program Implementation – Monitoring..... | 5 |
| 3.1 <i>Compliance Audits.....</i> | <i>5</i> |
| 3.2 <i>Self-Certifications</i> | <i>6</i> |
| 3.3 <i>Spot-Checks.....</i> | <i>6</i> |
| 3.4 <i>Compliance Violation Investigations (CVI)</i> | <i>6</i> |
| 3.5 <i>Self-Reports</i> | <i>6</i> |
| 3.6 <i>Periodic Data Submittals</i> | <i>7</i> |
| 4. Reliability Standards Subject to the 2016 Implementation Plan..... | 7 |
| 4.1 <i>Actively Monitored Reliability Standards</i> | <i>7</i> |
| 5. Violation Review Process | 8 |
| 5.1 <i>Initial Review</i> | <i>8</i> |
| 5.2 <i>BC Find, Fix, Track Process</i> | <i>8</i> |
| 5.3 <i>Contents of Notice of Alleged Violation.....</i> | <i>10</i> |
| 6. Mitigation Plans | 11 |
| 6.1 <i>Proposed Mitigation Plans.....</i> | <i>11</i> |
| 6.2 <i>Implementation of Mitigation Plans</i> | <i>12</i> |
| 6.3 <i>Completion of Mitigation Plans</i> | <i>12</i> |
| 7. Compliance Outreach..... | 12 |
| 7.1 <i>Compliance User Group (CUG)</i> | <i>13</i> |
| 7.2 <i>Critical Infrastructure Protection (CIP) User Group (CIPUG).....</i> | <i>13</i> |
| 7.3 <i>Compliance webCDMS and EFT Server Training.....</i> | <i>13</i> |
| 7.4 <i>Open Webinars.....</i> | <i>13</i> |
| 7.5 <i>Questions and Answers by Subject Matter Experts (SME)</i> | <i>14</i> |
| 7.6 <i>Compliance Questions and Answers</i> | <i>14</i> |

Appendices

Appendix A – Actively Monitored Standards List

Appendix B – Audit Schedule

1. Introduction and Context

The British Columbia Utilities Commission (BCUC) is responsible for monitoring and assessing compliance with approved British Columbia Reliability Standards. The BCUC and the Western Electricity Coordinating Council (WECC) have entered into an Administration Agreement under which WECC will assist the BCUC in monitoring compliance with Reliability Standards. In accordance with the BCUC/WECC Administration Agreement:

- The BCUC grants WECC the authority to act as the BCUC's Administrator in the administration of the approved Reliability Standards program in British Columbia. This grant of authority is restricted to the actions and obligations specified in the [Rules of Procedure](#), including the [Registration Manual](#) and [Compliance Monitoring Program](#), and as otherwise ordered by the BCUC.
- WECC is to submit annually to the BCUC, for review and approval, an Implementation Plan for the following calendar year. The goal of the Implementation Plan is to meet the requirements of the Rules of Procedure, generally, and those specifically identified in the Compliance Monitoring Program. In the event of any conflict between this Implementation Plan and the Compliance Monitoring Program, this Implementation Plan governs.

The WECC Compliance Department worked with BCUC staff to develop this annual Implementation Plan. This Implementation Plan is the operating plan of the Compliance Monitoring Program and identifies the Reliability Standards for which WECC will assist the BCUC to monitor and assess compliance and the methods for monitoring compliance during 2016.

Unless directed otherwise by the BCUC:

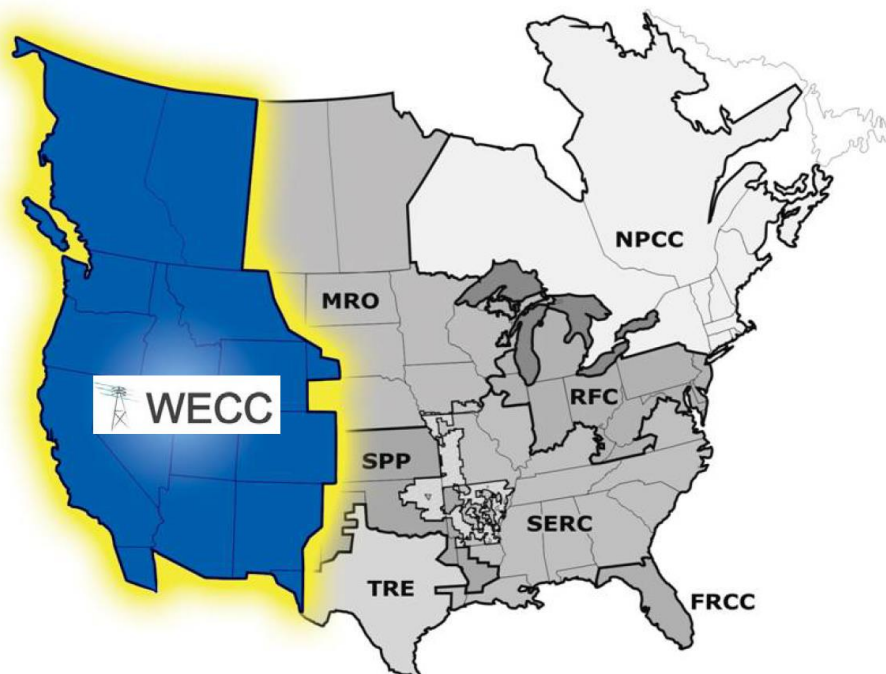
- Reliability Compliance is monitored from each Entity's Compliance Date, as defined in the Rules of Procedure. The Entity's registration date is not determinative for this purpose.
- Any assignment of responsibility for compliance with Reliability Standards requires a valid written notice of assignment be sent to the BCUC with a copy to WECC, transferring responsibility for compliance with the requirement(s), including reporting, to another registered Entity.

This Implementation Plan includes references to the WECC Web Compliance Data Management System (webCDMS) and to the Enhanced File Transfer (EFT) Server currently used by WECC for electronic submittal and distribution of documents. webCDMS is WECC's primary compliance data system used for compliance monitoring processes. The EFT Server is used as a file upload solution for Audits and Spot-Checks, as well as ad-hoc requests. For convenient reference, webCDMS and EFT Server usage details are available on the WECC website at: <https://www.wecc.biz/Pages/Compliance-BritishColumbia.aspx>

In the event that WECC may designate any other process for submittal of data, information, or communications regarding compliance with Reliability Standards, WECC will provide Entities with prompt notification and appropriate details of the process.

2. Compliance Monitoring Program Administrator (WECC)

2.1 WECC Operating Area



3. 2016 Program Implementation – Monitoring

WECC Compliance staff will work under the direction of the BCUC to assist with monitoring compliance with the Reliability Standards adopted by the BCUC in a manner consistent with the BCUC Compliance Monitoring Program (CMP) and the monitoring processes specified therein, as outlined below.

Reliability Standards adopted by the BCUC can be accessed from the BCUC website or found using the following link:

<https://www.wecc.biz/Standards/Pages/Default.aspx>

3.1 Compliance Audits

WECC will conduct a Compliance Audit of every Entity registered as a Balancing Authority (BA) and/or Transmission Operator (TOP) every three (3) years. All other Entities may be subject to Compliance Audits every six (6) years or as approved by the BCUC. Any portion of a Compliance Audit may be conducted on- or off-site, as determined to be appropriate by WECC. The Audit Schedule is subject to scheduling adjustments.

A Compliance Audit generally encompasses the period of three (3) years preceding the start of the Compliance Audit and may not go back beyond the completion date of the Entity's last Compliance Audit. Compliance Audits may include a review of compliance with all Reliability Standards applicable to the Entity. Compliance Audits will review, at a minimum, all applicable Reliability Standards identified in Appendix A under the column marked "Compliance Audit." Compliance Audits will include a review of any matters subject to a Compliance Violation Investigation in the previous year, as well as the status of mitigation plans, and also may include an examination of other items if requested by the BCUC. During the Compliance Audit, WECC may expand an audit's scope if it determines such an expansion is appropriate.

Subject to possible adjustments, the WECC Compliance Audit Schedule for Entities scheduled for Compliance Audits during the program year can be identified in Appendix B. In addition, at least 90 days prior to the commencement of a scheduled Compliance Audit, WECC will:

- 1) notify the Entity of the Compliance Audit;
- 2) identify the Compliance Audit Committee members and their recent employment history; and
- 3) request information.

Reliability Standards Audit Worksheets (RSAW) for those Reliability Standards selected for audit in 2016 will be provided to the Entities with the Notice of Compliance Audit.

When the draft Audit Report review process is complete, as described in the CMP, WECC will provide the final Audit Report to the BCUC and the Entity. The final Audit

Report is considered to be accepted by the BCUC 30 days after WECC provides it unless the BCUC directs otherwise.

Section 2.1 of the CMP provides information about Compliance Audits.

3.2 Self-Certifications

Self-Certifications will not be a required component of compliance monitoring during the 2016 Implementation Plan year. Existing monitoring methods may be used by the Administrator to request demonstration of compliance.

3.3 Spot-Checks

WECC may perform Spot-Checks at any time. Spot-Checks may be performed either on- or off-site at WECC's discretion.

Spot-Checks may require submission of information by the Entity to WECC. WECC will provide at least 20 days advance notice of a Spot-Check to the Entity and will provide a copy of the notice to the BCUC. The notice will include the reason(s) for the Spot-Check, the Reliability Standards subject to the Spot-Check, and the date the Entity is to submit or otherwise make the required information available to WECC.

Section 2.3 of the CMP provides information about Spot Checks.

3.4 Compliance Violation Investigations (CVI)

After BCUC approval, WECC may perform a CVI at any time circumstances indicate a Possible Violation of a Reliability Standard, or as otherwise directed by the BCUC. WECC will notify the Entity within three (3) business days of the decision to initiate a CVI and the reason(s) for the investigation.

Section 2.4 of the CMP provides information about CVIs.

3.5 Self-Reports

Entities are encouraged to file Self-Reports with WECC when they become aware of a Possible Violation of a Reliability Standard. An Entity should Self-Report a Possible Violation after it has evaluated the potential non-compliance and determined that an actual violation of a Reliability Standard has occurred. Filing a Self-Report is encouraged regardless of whether the Reliability Standard requires reporting on a pre-defined schedule, such as through Periodic Data Submittals.

WECC will review Self-Reports and may request that the Entity provide clarification or additional information. WECC will notify the Entity of the results of its review in a notification of Find, Fix, Track Processing, Notice of Alleged Violation or in a notification of Self-Report dismissal.

Section 2.5. of the CMP provides information about Self-Reporting.

The webCDMS Regional Entity Quick Start Guide provides information regarding Self-Report submittals.

3.6 Periodic Data Submittals

Some Reliability Standards require the periodic submittal of information to demonstrate compliance with the requirements of the standard. Entities are required to provide to WECC Periodic Data Submittals for all applicable Reliability Standards identified in Appendix A under the column marked "Periodic Data Submittal."

The reporting intervals and timing are contained within the applicable Reliability Standards. WECC will issue a request to the Entity for a Periodic Data Submittal at least 20 days prior to the required submittal date.

WECC will review the Periodic Data Submittals and may request the Entity to provide clarification or additional information. If WECC identifies a Possible Violation, then it may (and if directed by the BCUC will), provide the BCUC and the Entity with a notification of Find, Fix, Track Processing or Notice of Alleged Violation, as explained in Section 5 of this Implementation Plan.

Section 2.6 of the CMP provides information about Periodic Data Submittals.

The webCDMS Regional Entity Quick Start Guide provides information concerning the Periodic Data Submittal process.

4. Reliability Standards Subject to the 2016 Implementation Plan

Each Entity is responsible for compliance with all Reliability Standards adopted by the BCUC that apply to the functions for which each Entity is registered. However, a subset of those Reliability Standards may be actively monitored as set forth in this Implementation Plan for 2016.

4.1 Actively Monitored Reliability Standards

For 2016, WECC will actively monitor, at a minimum, the Reliability Standards identified in Appendix A using the monitoring processes specified in Appendix A. As revisions and additions to Reliability Standards are approved by the BCUC, the revised and additional standards may be added to the Actively Monitored Standards List (AML) for monitoring in the same manner as the standards and requirements they are replacing for the appropriate time period.

The AML for British Columbia was developed in coordination with the process used for selecting areas of focus recommended by the North American Electric Reliability Corporation (NERC) and WECC. This process incorporates some elements of NERC's Reliability Assurance Initiative (RAI) by focusing the annual compliance monitoring plan

on those standards and requirements related to industry and regional perspectives on greater risks to the reliability of the bulk electric system.

Entities are responsible for compliance with all BCUC-approved Reliability Standards in effect for their applicable function(s) at all times.

5. Violation Review Process

5.1 Initial Review

The Administrator will consider all evidence provided in conjunction with a possible non-compliance with a Reliability Standard and will proceed as follows, unless ordered otherwise by the Commission.

- 5.1.1 If the Administrator considers that there is no evidence to substantiate a Possible Violation, no further process applies and the Administrator will notify the Entity and the Commission that the Possible Violation is dismissed and no further action is required.
- 5.1.2 If the Administrator identifies a Possible Violation as one that may be processed under the BC Find, Fix, Track (FFT) Process, the Administrator will follow the BC FFT Process described in section 4.2 of the CMP.
- 5.1.3 If the Administrator identifies a Possible Violation as one that may not be processed under the BC FFT Process, the Administrator will follow the Alleged Violation Process in section 4.3 of the CMP.
- 5.1.4 If a Possible Violation has been identified and considered under one monitoring process, the Administrator will not review the same occurrence if it is subsequently identified as a Possible Violation under another monitoring process unless it appears that significant additional information is available. If significant additional information is available, the scope of a Possible Violation may be expanded.

5.2 BC Find, Fix, Track Process

The Commission may approve alterations to the BC FFT process if such alterations appear to present material benefits for furthering reliability objectives and promoting administrative efficiencies in the BC MRS Program. Alterations to the BC FFT Process may be included in the annual Implementation Plan or otherwise approved by the Commission.

- 5.2.1 The Administrator will perform an FFT review on a Possible Violation before considering following the Alleged Violation process.
- 5.2.2 Unless the Commission orders that other factors are to be considered, the

Administrator will consider the following in performing an FFT review:

- 1) The underlying facts and circumstances (i.e., what happened, how, why, where and when);
- 2) The specific Reliability Standard(s) possibly violated;
- 3) Whether the Entity has mitigated or begun mitigation of the Possible Violation or not. A Mitigation Plan for a Possible Violation in the FFT process generally requires the expected completion be within three (3) months of submittal. Considering the recent approval and implementation of the FFT Process in BC, Possible Violations of Reliability Standards qualifying for FFT processing and considered to warrant a mitigation period longer than three months are still being evaluated.
- 4) The Administrator's assessment of potential and actual level of risk to reliability, including mitigating factors during the period of non-compliance;
- 5) Information that the Administrator may have about the perceived strength of the Entity's compliance program, including preventive and corrective processes and procedures, internal controls and culture of compliance;
- 6) Information that the Administrator may have about the Entity's compliance record; and
- 7) Whether aggravating factors are present.

5.2.3 The Administrator will notify the Commission and the Entity in writing that it will follow the BC FFT Process. If, within thirty (30) days after that notice is sent, either: (a) the Commission directs the Administrator to proceed under any other process, or (b) the Entity provides a written request to the Administrator, with a copy to the Commission, requesting that the Alleged Violation process be followed instead, then the Administrator will instead follow the Alleged Violation process or such other process the Commission may direct.

5.2.4 Unless the Commission orders otherwise, Possible Violations that are processed under the BC FFT Process will not be processed as Alleged Violations and will not become Confirmed Violations. A Possible Violation resolved through the BC FFT Process will not be classified as a contravention under the Act and will not attract administrative penalties. However, the existence of earlier Possible Violations that have been resolved through the BC FFT Process will be part of the Entity's compliance history that may be considered by the Commission in determining penalties for other contraventions for the Entity.

5.2.5 Mitigation information is an important consideration of whether a Possible Violation is considered for the BC FFT process. Nonetheless, if a Possible

Violation included in the BC FFT Process has not yet been mitigated, the Entity must submit a Mitigation Plan to the Administrator, or a description of how the Possible Violation has been mitigated, within thirty (30) days after the Administrator notifies the Entity that it will follow the BC FFT Process. The provisions of section 5.0 of the CMP dealing with Mitigation Plans are applicable.

- 5.2.6 In order for a Possible Violation to be considered as resolved through the BC FFT Process, an Entity must provide an Attestation acceptable to the Administrator describing the remediation work completed.
- 5.2.7 The Commission will consider a Possible Violation matter closed when the Administrator reports it to the Commission as a Remediated FFT Issue, unless the Commission provides notice to the Administrator and the Entity at any time that further review will be required.
- 5.2.8 The Administrator will report items processed as FFTs to the Commission within thirty (30) days of notifying an Entity of an FFT.
- 5.2.9 If at any point it appears to the Commission that Remediated FFT Issue status was achieved on the basis of a material misrepresentation of facts, the Commission may direct the Administrator to reprocess the matter as an Alleged Violation. The duration of the Alleged Violation may be considered to begin with the original start date of what had been considered to be a Remediated FFT Issue. Particulars of misrepresentation may be considered by the Commission in determining any sanctions that the Commission may determine to be applicable.
- 5.2.10 The Commission may publish status reports including the name of Entities with Possible Violations in the BC FFT Process or Remediated FFT Issues and details of the nature of the Possible Violations and Remediated FFT Issues, unless disclosure relates to a cyber-security incident or would jeopardize the security of the bulk power system.
- 5.2.11 If the Administrator identifies a Possible Violation as not one that the Administrator would approach as an FFT under the BC FFT process, the Alleged Violation process described in section 4.3 of the CMP would proceed.

5.3 Contents of Notice of Alleged Violation

If WECC concludes, based on the facts and circumstances, that evidence exists to indicate an Entity has violated a Reliability Standard, WECC will issue a Notice of Alleged Violation to the BCUC and the Entity's Compliance Contact.

WECC will treat a Notice of Alleged Violation as confidential.

The Notice of Alleged Violation will contain:

- The Reliability Standard and specific requirements that are the subject matter of the Alleged Violation;
- The date(s) the Alleged Violation occurred (or is occurring);
- A description of the facts and evidence that allegedly demonstrate or constitute the Alleged Violation;
- A description of the severity of the violation;
- Reference Violation Risk Factor (VRF) and Violation Severity Level (VSL) factors relevant to the circumstances of the Alleged Violation.
- A proposed penalty amount, if any, which references the base penalty range for the potential contravention under the BC Penalty matrix.
- A detailed reminder of:
 - i. the Entity's rights and obligations pursuant to the Entity's response to the Notice of Alleged Violation, as described in Section 4.3 and 4.4 of the BCUC CMP; and
 - ii. the processes associated with submission of Mitigation Plans, as described in Section 5.0 of the BCUC CMP.

Section 4.3 of the CMP provides information about a Notice of Alleged Violation.

6. Mitigation Plans

The BCUC and WECC strongly encourage Entities to thoroughly and swiftly mitigate any suspected non-compliance as soon as that non-compliance has been discovered. Entities must submit Mitigation Plans in accordance with the timelines and requirements in Section 5.0 of the BCUC CMP.

6.1 Proposed Mitigation Plans

The Entity will submit proposed Mitigation Plans to WECC using webCDMS. WECC will notify the Entity and the BCUC once its review is complete.

If WECC agrees with the proposed Mitigation Plan, it will promptly forward the Mitigation Plan to the BCUC and the Entity, and include a letter recommending its acceptance. The approval and rejection process for Mitigation Plans is governed by Section 5.7 of the CMP.

Section 5.0 of the CMP provides information about Mitigation Plans.

The webCDMS Regional Entity Quick Start Guide provides information regarding Mitigation Plan submittal.

6.2 Implementation of Mitigation Plans

The Entity must provide WECC with updates by each milestone due date on the progress of its Mitigation Plan. WECC will track implementation of Mitigation Plans. WECC may conduct on-site visits and review the Mitigation Plan's status during Compliance Audits to monitor implementation.

The Entity may submit requests to revise the Mitigation Plan or extend the Mitigation Plan completion date to WECC. WECC will review these requests and make recommendations for BCUC acceptance or rejection.

6.3 Completion of Mitigation Plans

Upon completion of a Mitigation Plan, the Entity must provide attestation to WECC that all required actions described in the Mitigation Plan have been completed. The attestation is to be submitted using webCDMS, and the Entity will include information and evidence sufficient to verify completion. The BCUC or WECC may conduct a Spot-Check and review the status during Compliance Audits to verify that all required actions in the Mitigation Plan have been completed.

If WECC agrees that a Mitigation Plan has been completed, it will promptly forward a letter recommending approval by the BCUC. The Entity will also be included in this correspondence.

If WECC disagrees that the Mitigation Plan has been completed, it will notify the Entity and provide detailed reasons for the disagreement. WECC will request the Entity submit a revised Mitigation Plan, which begins the submittal and review process again. The Entity may appeal to the BCUC as provided in Section 5.8 of the BCUC CMP.

The webCDMS Regional Entity Quick Start Guide provides information regarding Attestation of Mitigation Plan Completion submittal.

7. Compliance Outreach

WECC values the relationship it has with every member and entity in the Western Interconnection. WECC is working to strengthen stakeholder relations, improve communications, and promote meaningful training and educational opportunities while providing appropriate assistance with compliance. WECC's Outreach program includes:

- Compliance User Group (CUG) meetings
- Critical Infrastructure Protection User Group (CIPUG) meetings
- Compliance webCDMS and Enhanced File Transfer (EFT) Server Training
- Open Webinar Sessions
- Questions and Answers by Subject Matter Experts
- Compliance Questions and Answers

WECC invites and encourages the participation of every member and Entity in its Outreach program. WECC welcomes the opportunity to combine its efforts to promote and maintain a reliable electric power system in the Western Interconnection with those of its members and the Entities. As part of its outreach effort, WECC works with the Western Interconnection Compliance Forum (WICF) to further understand the needs of entities in the region. Questions concerning the WECC Outreach program should be directed to support@wecc.biz.

Additional information can be found on the WECC Outreach home page using the following link: <https://www.wecc.biz/TrainingAndEducation/Pages/Compliance.aspx>

7.1 Compliance User Group (CUG)

The Compliance User Group provides an open forum for the exchange of information regarding the WECC Compliance program and the enforcement of mandatory Reliability Standards in the Western Interconnection. All Entities are encouraged to participate in the CUG. All CUG meetings are open to the public and anyone with an interest in compliance activities in the Western Interconnection may attend. The CUG generally meets in person two (2) times per year in cities in the West. Webinar access is available for those who are not able to attend in person. WECC continues to explore ways to increase participation.

7.2 Critical Infrastructure Protection (CIP) User Group (CIPUG)

Focusing on the CIP-002 through CIP-014 Reliability Standards, this user group focuses on CIP-related issues. CIPUG members include Entities, asset owners, industry experts, and WECC. Membership includes the opportunity to participate in semi-annual workshops for training and education on the demanding requirements and details of these critical standards.

7.3 Compliance webCDMS and EFT Server Training

WECC will offer training on changes or enhancements made to the webCDMS and EFT Server processes for all Entities. Periodic updates will be provided during the monthly Open Webinars. The webCDMS Regional Entity Quick Start Guide provides information on how to navigate and report compliance data through webCDMS.

Questions concerning webCDMS or EFT Server processes should be directed to support@wecc.biz. Assistance with webCDMS or the EFT Server is also available by telephone at (801) 883-6879.

7.4 Open Webinars

The monthly "Open Webinar" provides an opportunity for open discussion regarding pre-determined standards and compliance topics. They are followed by an open Q&A period. All Entities are invited and encouraged to participate, along with WECC Compliance staff and Subject Matter Experts. Typically, these calls do not provide a forum to address entity-specific questions and issues. Any Entity with specific questions can contact WECC Compliance staff directly. WECC records the Open Webinars and

provides access to these recordings on its website for a 30-day period following the calls.

The Open Webinars for all entities in the Western Interconnection are scheduled for the third Thursday of each month at 2:00 p.m. Mountain Time.

7.5 Questions and Answers by Subject Matter Experts (SME)

WECC Compliance Subject Matter Experts, also known as Compliance Engineers or Compliance Auditors, exhibit the highest level of expertise in performing the Reliability Standards audit and investigation processes. Each SME has special, in-depth knowledge of a reliability standard or area of discipline. This enhances the team's overall skill, knowledge, and competence. Each SME is available to address specific entity questions regarding compliance.

Contact information can be found on the WECC Compliance SME list using the following link:

<https://www.wecc.biz/Administrative/WECC%20Audit%20Subject%20Matter%20Experts%20List.pdf>

7.6 Compliance Questions and Answers

The WECC Compliance Department appreciates the need for Entities to pose compliance-related questions.

WECC has set up the support@wecc.biz email address to provide an avenue for WECC to answer these questions. WECC logs every question and the appropriate WECC SME provides a response. If a telephone call is preferred to an email, calls made to (801) 883-6870 are answered and forwarded to the appropriate Compliance staff member or SME.

2016 ACTIVELY MONITORED STANDARDS LIST FOR BC

NOTES:

- 1) This Actively Monitored Standards List reflects BCUC-approved Reliability Standards that have been selected for particular monitoring in 2016 as set forth in the 2016 Implementation Plan for BC. Note that for Periodic Data Submittals, reporting intervals and timing are specified in the applicable Reliability Standards, and event-driven Periodic Data Submittals are in addition to scheduled Periodic Data Submittals in the table below. Self-Reports are always encouraged.
- 2) Entities are responsible for compliance with all BCUC-approved Reliability Standards in effect per their registered function at all times, regardless of what is specified as actively monitored in the standards below.
- 3) As revisions and additions to Reliability Standards are approved by the BCUC, the revised and additional standards and requirements may be added to this list for particular monitoring in the same manner as those standards and requirements they may be replacing.

| BCUC-approved Reliability Standard | Reliability Standard Requirement Number | List of Functions Monitored in BC | Compliance Audit (X) | Scheduled Periodic Data Submittals: Monthly Quarterly Yearly |
|------------------------------------|---|-----------------------------------|----------------------|--|
| BAL-001-1 | R1. | BA | | Monthly |
| BAL-001-1 | R2. | BA | | Monthly |
| BAL-002-1 | R1. | BA | | Quarterly |
| BAL-002-1 | R1.1. | BA | | Quarterly |
| BAL-002-1 | R3. | BA | | Quarterly |
| BAL-002-1 | R4. | BA | | Quarterly |
| BAL-002-1 | R5. | BA | | Quarterly |
| BAL-002-1 | R6. | BA | | Quarterly |
| BAL-006-2 | R4. | BA | | Monthly |
| BAL-006-2 | R4.1. | BA | | Monthly |
| BAL-006-2 | R4.1.1. | BA | | Monthly |
| BAL-006-2 | R4.1.2. | BA | | Monthly |

2016 ACTIVELY MONITORED STANDARDS LIST FOR BC

| BCUC-approved Reliability Standard | Reliability Standard Requirement Number | List of Functions Monitored in BC | Compliance Audit (X) | Scheduled Periodic Data Submittals: Monthly Quarterly Yearly |
|------------------------------------|---|-----------------------------------|----------------------|--|
| BAL-006-2 | R4.2. | BA | | Monthly |
| CIP-002-3 | R1. | BA, GO, GOP, LSE, TO, TOP, TSP | X | |
| CIP-002-3 | R1.1. | BA, GO, GOP, LSE, TO, TOP, TSP | X | |
| CIP-002-3 | R1.2. | BA, GO, GOP, LSE, TO, TOP, TSP | X | |
| CIP-002-3 | R1.2.1. | BA, GO, GOP, LSE, TO, TOP, TSP | X | |
| CIP-002-3 | R1.2.2. | BA, GO, GOP, LSE, TO, TOP, TSP | X | |
| CIP-002-3 | R1.2.3. | BA, GO, GOP, LSE, TO, TOP, TSP | X | |
| CIP-002-3 | R1.2.4. | BA, GO, GOP, LSE, TO, TOP, TSP | X | |
| CIP-002-3 | R1.2.5. | BA, GO, GOP, LSE, TO, TOP, TSP | X | |
| CIP-002-3 | R1.2.6. | BA, GO, GOP, LSE, TO, TOP, TSP | X | |
| CIP-002-3 | R1.2.7. | BA, GO, GOP, LSE, TO, TOP, TSP | X | |
| CIP-002-3 | R2. | BA, GO, GOP, LSE, TO, TOP, TSP | X | |
| CIP-002-3 | R3. | BA, GO, GOP, LSE, TO, TOP, TSP | X | |
| CIP-002-3 | R3.1. | BA, GO, GOP, LSE, TO, TOP, TSP | X | |
| CIP-002-3 | R3.2. | BA, GO, GOP, LSE, TO, TOP, TSP | X | |
| CIP-002-3 | R3.3. | BA, GO, GOP, LSE, TO, TOP, TSP | X | |
| CIP-002-3 | R4. | BA, GO, GOP, LSE, TO, TOP, TSP | X | |
| CIP-003-3 | R2. | BA, GO, GOP, LSE, TO, TOP, TSP | X | |
| CIP-003-3 | R2.1. | BA, GO, GOP, LSE, TO, TOP, TSP | X | |
| CIP-003-3 | R2.2. | BA, GO, GOP, LSE, TO, TOP, TSP | X | |
| CIP-003-3 | R2.3. | BA, GO, GOP, LSE, TO, TOP, TSP | X | |

| BCUC-approved Reliability Standard | Reliability Standard Requirement Number | List of Functions Monitored in BC | Compliance Audit (X) | Scheduled Periodic Data Submittals: Monthly Quarterly Yearly |
|--|---|--------------------------------------|-------------------------|--|
| CIP-003-3 | R2.4. | BA, GO, GOP, LSE, TO, TOP, TSP | X | |
| COM-002-2 | R2. | BA, TOP | X | |
| EOP-001-2.1b | R2. | BA, TOP | X | |
| EOP-001-2.1b | R2.1. | BA, TOP | X | |
| EOP-001-2.1b | R2.2. | BA, TOP | X | |
| EOP-001-2.1b | R2.3. | BA, TOP | X | |
| EOP-001-2.1b | R3. | BA, TOP | X | |
| EOP-001-2.1b | R3.1. | BA, TOP | X | |
| EOP-001-2.1b | R3.2. | BA, TOP | X | |
| EOP-001-2.1b | R3.3. | BA, TOP | X | |
| EOP-001-2.1b | R3.4. | BA, TOP | X | |
| FAC-003-3 | R1. | TO, GO | X | Quarterly |
| FAC-003-3 | R2. | TO, GO | X | Quarterly |
| FAC-003-3 | R6. | TO, GO | X | |
| FAC-003-3 | R7. | TO, GO | X | |
| FAC-008-3 | R6. | GO, TO | X | |
| FAC-014-2 | R5.2. | TOP | X | |
| PER-005-1 | R2. | BA, TOP | X | |
| PER-005-1 | R2.1. | BA, TOP | X | |
| PER-005-1 | R3. | BA, TOP | X | |
| PER-005-1 | R3.1. | BA, TOP | X | |

2016 ACTIVELY MONITORED STANDARDS LIST FOR BC

| BCUC-approved Reliability Standard | Reliability Standard Requirement Number | List of Functions Monitored in BC | Compliance Audit (X) | Scheduled Periodic Data Submittals: Monthly Quarterly Yearly |
|--|---|--------------------------------------|-------------------------|--|
| PRC-001-1.1 | R3. | GOP, TOP | X | |
| PRC-001-1.1 | R3.1. | GOP, TOP | X | |
| PRC-001-1.1 | R3.2. | GOP, TOP | X | |
| PRC-001-1.1 | R4. | TOP | X | |
| PRC-001-1.1 | R5. | GOP, TOP | X | |
| PRC-001-1.1 | R5.1. | GOP | X | |
| PRC-001-1.1 | R5.2. | TOP | X | |
| PRC-004-2.1a | R1. | TO, DP | X | |
| PRC-004-2.1a | R2. | GO | X | |
| PRC-004-2.1a | R3. | GO, TO, DP | | Quarterly |
| PRC-004-WECC-1 | R3. | GO, TO | | Quarterly |
| PRC-004-WECC-1 | R3.1. | GO, TO | | Quarterly |
| PRC-004-WECC-1 | R3.2. | GO, TO | | Quarterly |
| PRC-005-1.1b | R2. | TO, DP, GO | X | |
| PRC-005-1.1b | R2.1. | TO, DP, GO | X | |
| PRC-005-1.1b | R2.2. | TO, DP, GO | X | |
| PRC-021-1 | R1. | DP, TO | | Yearly |
| PRC-021-1 | R1.1. | DP, TO | | Yearly |
| PRC-021-1 | R1.2. | DP, TO | | Yearly |
| PRC-021-1 | R1.3. | DP, TO | | Yearly |
| PRC-021-1 | R1.4. | DP, TO | | Yearly |

2016 ACTIVELY MONITORED STANDARDS LIST FOR BC

| BCUC-approved Reliability Standard | Reliability Standard Requirement Number | List of Functions Monitored in BC | Compliance Audit (X) | Scheduled Periodic Data Submittals: Monthly Quarterly Yearly |
|--|---|--------------------------------------|-------------------------|--|
| PRC-021-1 | R1.5. | DP, TO | | Yearly |
| TOP-006-2 | R1. | BA, TOP | X | |
| TOP-006-2 | R1.1. | GOP | X | |
| TOP-006-2 | R1.2. | BA, TOP | X | |
| TOP-006-2 | R2. | BA, TOP | X | |
| TOP-006-2 | R7. | BA, TOP | X | |
| TOP-007-0 | R1. | TOP | X | |
| TOP-007-0 | R2. | TOP | X | |
| TOP-007-0 | R3. | TOP | X | |
| TPL-001-0.1 | R3. | PA, TP | | Yearly |
| TPL-002-0b | R3. | PA, TP | | Yearly |
| TPL-003-0b | R3. | PA, TP | | Yearly |
| TPL-004-0a | R2. | PA, TP | | Yearly |
| VAR-002-WECC-1 | R1. | GOP, TOP | | Quarterly |
| VAR-002-WECC-1 | R1.1. | GOP, TOP | | Quarterly |
| VAR-002-WECC-1 | R1.2. | GOP, TOP | | Quarterly |
| VAR-002-WECC-1 | R1.3. | GOP, TOP | | Quarterly |
| VAR-002-WECC-1 | R1.4. | GOP, TOP | | Quarterly |
| VAR-002-WECC-1 | R1.5. | GOP, TOP | | Quarterly |
| VAR-002-WECC-1 | R1.6. | GOP, TOP | | Quarterly |
| VAR-002-WECC-1 | R1.7. | GOP, TOP | | Quarterly |

2016 ACTIVELY MONITORED STANDARDS LIST FOR BC

| BCUC-approved Reliability Standard | Reliability Standard Requirement Number | List of Functions Monitored in BC | Compliance Audit (X) | Scheduled Periodic Data Submittals: Monthly Quarterly Yearly |
|--|---|--------------------------------------|-------------------------|--|
| VAR-002-WECC-1 | R1.8. | GOP, TOP | | Quarterly |
| VAR-002-WECC-1 | R1.9. | TOP | | Quarterly |
| VAR-002-WECC-1 | R1.10. | GOP, TOP | | Quarterly |
| VAR-002-WECC-1 | R2. | GOP, TOP | | Quarterly |
| VAR-501-WECC-1 | R1. | GOP | | Quarterly |
| VAR-501-WECC-1 | R1.1. | GOP | | Quarterly |
| VAR-501-WECC-1 | R1.2. | GOP | | Quarterly |
| VAR-501-WECC-1 | R1.3. | GOP | | Quarterly |
| VAR-501-WECC-1 | R1.4. | GOP | | Quarterly |
| VAR-501-WECC-1 | R1.5. | GOP | | Quarterly |
| VAR-501-WECC-1 | R1.6. | GOP | | Quarterly |
| VAR-501-WECC-1 | R1.7. | GOP | | Quarterly |
| VAR-501-WECC-1 | R1.8. | GOP | | Quarterly |
| VAR-501-WECC-1 | R1.9. | GOP | | Quarterly |
| VAR-501-WECC-1 | R1.10. | GOP | | Quarterly |
| VAR-501-WECC-1 | R1.11. | GOP | | Quarterly |
| VAR-501-WECC-1 | R1.12. | GOP | | Quarterly |
| VAR-501-WECC-1 | R2. | GOP | | Quarterly |

2016 Audit Schedule for British Columbia

| WECC ID | ACRONYM | REGISTERED ENTITY NAME | TEAM TYPE | AUDIT TYPE | BEGIN DATE | END DATE | LOCATION |
|---------|---------|--------------------------------|-----------|------------|------------|----------|--------------|
| WCR0027 | RTA | Rio Tinto Alcan | CIP | On-site | 05/16/16 | 05/27/16 | Kitimat, BC |
| WCR0027 | RTA | Rio Tinto Alcan | OP | On-site | 05/16/16 | 05/27/16 | Kitimat, BC |
| WCR0028 | CWEI | Innergex Renewable Energy Inc. | CIP | Off-site | 08/22/16 | 09/02/16 | WECC Offices |
| WCR0028 | CWEI | Innergex Renewable Energy Inc. | OP | Off-site | 08/22/16 | 09/02/16 | WECC Offices |

Entities will be audited for all registered functions.