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#### ORDER NUMBER R-28-19

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

and

An Implementation Plan for Monitoring Compliance with British Columbia Reliability Standards in 2020

#### **BEFORE:**

W. M. Everett, QC, Commissioner

on November 7, 2019

#### **ORDER**

#### **WHEREAS:**

- A. On October 31, 2019, the Western Electricity Coordinating Council (WECC) submitted the 2020 Implementation Plan for Monitoring Compliance with British Columbia Reliability Standards (2020 Implementation Plan) to the British Columbia Utilities Commission (BCUC) for approval;
- B. Order G-123-09 approved the Rules of Procedure for Reliability Standards in British Columbia (ROP), including the Compliance Monitoring Program (CMP) appended thereto, setting out the administrative framework for monitoring compliance with adopted Reliability Standards in British Columbia (BC) and most recent revisions to the ROP and CMP were approved by Order R-40-17, dated September 1, 2017. The ROP define terms used in the BC Mandatory Reliability Standards Program which are capitalized in this order;
- C. Order G-123-09 also appointed WECC as the BCUC's Administrator to assist the BCUC in carrying out its functions related to Reliability Standards in the manner described in the Administration Agreement between WECC and the BCUC dated October 8, 2009, and renewed for a second time on July 5, 2019;
- D. 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 BCUC approval. Once approved, the Implementation Plan is to be posted on the WECC website with appropriate links from the BCUC website and Entities are to be notified electronically that the Implementation Plan has been posted; and
- E. The BCUC reviewed and considered the 2020 Implementation Plan submitted by WECC, including a list of minimum Reliability Standards to be actively monitored, methods to be used for monitoring, Periodic Data Submittal requirements and an Audit Schedule, and considers approval is warranted.

**NOW THEREFORE** pursuant to subsection 125.2(10) of the *Utilities Commission Act* and section 3.1 of the CMP, the BCUC orders as follows:

- 1. The 2020 Implementation Plan attached as Attachment A to this order is approved.
- 2. Entities subject to Reliability Standards in BC must comply with the terms of the 2020 Implementation Plan, unless otherwise ordered by the BCUC.
- 3. The 2020 Implementation Plan must be posted on the WECC website with links from the BCUC website throughout the calendar year 2020.
- 4. As new and revised standards are approved by the BCUC and become effective in BC, 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. WECC may expand the scope of a Compliance Audit and make minor changes to schedules or monitoring as required.

BY ORDER

Original signed by:

W. M. Everett, QC Commissioner

Attachment





# British Columbia Utilities Commission (BCUC)

Western Electricity
Coordinating Council (WECC)

2020 Implementation Plan

for Monitoring Compliance with British Columbia Reliability Standards

October 31, 2019

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### 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 or Administrator as noted in the BCUC Rules of Procedure and associated appendices) 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
  (BC). This grant of authority is restricted to the actions and obligations specified
  in the Rules of Procedure, including the Registration Manual, Compliance
  Monitoring Program, and Penalty Guidelines or 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 BCUC 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 staff worked with BCUC staff to develop this annual Implementation Plan, which serves as the operating plan of the Compliance Monitoring Program and identifies the BCUC approved Reliability Standards for which WECC will assist the BCUC to monitor and assess compliance and the methods for monitoring compliance during 2020.

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 Open Access Technology International, Inc. (OATI) 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 usage details are available on the WECC website at: <a href="https://www.wecc.biz/Pages/Compliance-BritishColumbia.aspx">https://www.wecc.biz/Pages/Compliance-BritishColumbia.aspx</a>. The EFT Server usage details are available on the WECC website at:

https://www.wecc.org/Administrative/GlobalScape%20Enhanced%20File%20Transfer%20Server%20User%20Guide-Updated%20July%202019 final.pdf

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.

## Compliance Monitoring Program Administrator (WECC)

#### 2.1 WECC Operating Area



## 3. 2020 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 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 Reliability Coordinator (RC), 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 date of the Entity's last Compliance Audit period. 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, Self-Reports, Periodic Data Submittals, and may also include an examination of other items if requested by the BCUC (Note: Periodic Data Submittals will be assessed only for instances of noncompliance). During the Compliance Audit, including any time prior to the Compliance Audit, WECC may expand the audit 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 ninety (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 (RSAWs) for those Reliability Standards selected for audit in 2020 will be provided to the Entities with the Notice of Compliance Audit.

During the compliance audit engagement, compliance auditors may find areas that are not findings of noncompliance, but is valuable information to the Entity to raise awareness by providing an area of concern or recommendation as described below:

- An area of concern is a situation that does not appear to involve a current or ongoing violation of a BC Reliability Standard requirement, but instead represents a situation or practice that could become a violation if not corrected.
- A recommendation is a notification to an entity of a situation where there may be opportunity for improving compliance related processes, procedures, or tools.

When the draft Audit Report review process is complete, as described in the Compliance Monitoring Program, 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 thirty (30) days after WECC provides it unless the BCUC directs otherwise.

Section 2.1 of the Compliance Monitoring Program provides information about Compliance Audits.

#### 3.2 Self-Certifications

Self-Certifications will not be a required component of compliance monitoring during the 2020 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 twenty (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 Compliance Monitoring Program provides information about Spot Checks.

#### 3.4 Compliance Violation Investigations

After BCUC approval, WECC may perform a Compliance Violation Investigation at any time in response to a system disturbance, Complaint, or Possible Violation of a Reliability Standard identified by any other means, or as otherwise directed by the BCUC. WECC will notify the Entity within three (3) business days of the decision to initiate a Compliance Violation Investigation and the reason(s) for the investigation.

Section 2.4 of the Compliance Monitoring Program provides information about Compliance Violation Investigations.

#### 3.5 Self-Reports

Entities are encouraged on a timely basis 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 and a Self-Report must include details and evidence of the potential non-compliance. Entities are encouraged to complete this review as soon as possible to ensure timely reporting. 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 additional 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 Compliance Monitoring Program 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 twenty (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 Compliance Monitoring Program 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 2020 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 2020.

#### 4.1 Actively Monitored Reliability Standards

For 2020, 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 for monitoring in the same manner as the standards and requirements they are replacing for the appropriate time period.

The Actively Monitored Standards List 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 areas of focus by using their annual Compliance Monitoring and Enforcement Implementation 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 Compliance Monitoring Program.
- 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 Compliance Monitoring Program.
- 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);
- 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 BC FFT Process generally requires the expected mitigation completion be within three (3) months of submittal.
- 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 Compliance Monitoring Program 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 Compliance Monitoring Program 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 (NOAV) to the BCUC and the Entity's Compliance Contact.

WECC will treat a NOAV as confidential.

#### The NOAV 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.
- The Administrator's risk assessment based on the facts and evidence.
- A proposed penalty amount, if any, which references the base penalty range for the potential contravention under the BC Penalty matrix, as described in Appendix 3 of the Rules of Procedure for Reliability Standards in BC.
- A detailed reminder of:
  - the Entity's rights and obligations pursuant to the Entity's response to the NOAV, as described in Section 4.3 and 4.4 of the BCUC Compliance Monitoring Program; and
  - ii. the processes associated with submission of Mitigation Plans, as described in Section 5.0 of the BCUC Compliance Monitoring Program.

Section 4.3 of the Compliance Monitoring Program provides information about a NOAV.

## 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 Compliance Monitoring Program.

#### **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 Compliance Monitoring Program.

Section 5.0 of the Compliance Monitoring Program 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 Compliance Monitoring Program.

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

## 7. 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. Participation at outreach events is encouraged and questions welcomed from every member and Entity. WECC's outreach program includes:

- Reliability and Security Workshops
- webCDMS and EFT Server Training
- Open Webinar Sessions
- Questions and Answers by Subject Matter Experts
- Compliance Questions and Answers

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 <a href="mailto:support@wecc.biz">support@wecc.biz</a>.

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

#### 7.1 Reliability and Security Workshops

Reliability and Security Workshops provide an experience with timely and engaging content to help keep Entities compliant, participate in interactive presentations to better facilitate knowledge transfer, and network with peers to gain further insights into best practices. Reliability and Security Workshops are open to the public and anyone with an interest in activities in the Western Interconnection may attend. Reliability and Security Workshops are held in person two (2) times per year in cities in the West.

#### 7.2 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 <a href="mailto:support@wecc.biz">support@wecc.biz</a>. Assistance with webCDMS or the EFT Server is also available by telephone at (801) 883-6879.

#### 7.3 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.

#### 7.4 Questions and Answers by Subject Matter Experts

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 Subject Matter Expert has special, in-depth knowledge of a reliability standard or area of discipline. This enhances the team's overall skill, knowledge, and competence. Each Subject Matter Expert is available to address specific entity questions regarding compliance.

Contact information can be found on the WECC Compliance Subject Matter Expert list using the following link: https://www.wecc.biz/Pages/Compliance-Contacts.aspx

#### 7.5 Compliance Questions and Answers

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

WECC has set up the <a href="mailto:support@wecc.biz">support@wecc.biz</a> email address to provide an avenue for WECC to answer these questions. WECC logs every question and the appropriate WECC Subject Matter Expert provides a response. If a telephone call is preferred to an email, calls made to (801) 883-6879 are answered and forwarded to the appropriate Compliance staff member or Subject Matter Expert.

#### 2020 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 2020 as set forth in the 2020 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-003-1.1	R1.	BA		Yearly
BAL-003-1.1	R2.	BA		Yearly
BAL-003-1.1	R3.	BA		Yearly
BAL-003-1.1	R3.1.	BA		Yearly
BAL-003-1.1	R3.2.	BA		Yearly
BAL-003-1.1	R4.	BA		Yearly
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.	ВА		Monthly

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#### 2020 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-002-5.1a	R1	RC, BA, GO, GOP, TO, TOP, DP	X	
CIP-002-5.1a	R1.1.	RC, BA, GO, GOP, TO, TOP, DP	X	
CIP-002-5.1a	R1.2.	RC, BA, GO, GOP, TO, TOP, DP	Х	
CIP-002-5.1a	R1.3.	RC, BA, GO, GOP, TO, TOP, DP	Х	
CIP-002-5.1a	R2.	RC, BA, GO, GOP, TO, TOP, DP	Х	
CIP-002-5.1a	R2.1.	RC, BA, GO, GOP, TO, TOP, DP	Х	
CIP-002-5.1a	R2.2.	RC, BA, GO, GOP, TO, TOP, DP	Х	
CIP-004-6	R4.	RC, BA, GO, GOP, TO, TOP, DP	Х	
CIP-004-6	R4.1.	RC, BA, GO, GOP, TO, TOP, DP	Х	
CIP-004-6	R4.2.	RC, BA, GO, GOP, TO, TOP, DP	Х	
CIP-004-6	R4.3.	RC, BA, GO, GOP, TO, TOP, DP	Х	
CIP-004-6	R4.4.	RC, BA, GO, GOP, TO, TOP, DP	Х	
CIP-004-6	R5.	RC, BA, GO, GOP, TO, TOP, DP	Х	
CIP-004-6	R5.1.	RC, BA, GO, GOP, TO, TOP, DP	Х	
CIP-004-6	R5.2.	RC, BA, GO, GOP, TO, TOP, DP	Х	
CIP-004-6	R5.3.	RC, BA, GO, GOP, TO, TOP, DP	Х	

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#### 2020 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
CIP-004-6	R5.4.	RC, BA, GO, GOP, TO, TOP, DP	X	
CIP-004-6	R5.5.	RC, BA, GO, GOP, TO, TOP, DP	X	
CIP-005-5	R1.	RC, BA, GO, GOP, TO, TOP, DP	Х	
CIP-005-5	R1.1.	RC, BA, GO, GOP, TO, TOP, DP	Х	
CIP-005-5	R1.2.	RC, BA, GO, GOP, TO, TOP, DP	Х	
CIP-005-5	R1.3.	RC, BA, GO, GOP, TO, TOP, DP	Х	
CIP-005-5	R1.4.	RC, BA, GO, GOP, TO, TOP, DP	Х	
CIP-005-5	R1.5.	RC, BA, GO, GOP, TO, TOP, DP	Х	
CIP-005-5	R2.	RC, BA, GO, GOP, TO, TOP, DP	Х	
CIP-005-5	R2.1.	RC, BA, GO, GOP, TO, TOP, DP	Х	
CIP-005-5	R2.2.	RC, BA, GO, GOP, TO, TOP, DP	Х	
CIP-005-5	R2.3.	RC, BA, GO, GOP, TO, TOP, DP	Х	
CIP-006-6	R1.	RC, BA, GO, GOP, TO, TOP, DP	Х	
CIP-006-6	R1.1.	RC, BA, GO, GOP, TO, TOP, DP	Х	
CIP-006-6	R1.2.	RC, BA, GO, GOP, TO, TOP, DP	Х	
CIP-006-6	R1.3.	RC, BA, GO, GOP, TO, TOP, DP	Х	
CIP-006-6	R1.4.	RC, BA, GO, GOP, TO, TOP, DP	Х	

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#### 2020 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
CIP-006-6	R1.5.	RC, BA, GO, GOP, TO, TOP, DP	X	
CIP-006-6	R1.6.	RC, BA, GO, GOP, TO, TOP, DP	X	
CIP-006-6	R1.7.	RC, BA, GO, GOP, TO, TOP, DP	Х	
CIP-006-6	R1.8.	RC, BA, GO, GOP, TO, TOP, DP	Х	
CIP-006-6	R1.9.	RC, BA, GO, GOP, TO, TOP, DP	Х	
CIP-006-6	R1.10.	RC, BA, GO, GOP, TO, TOP, DP	Х	
CIP-007-6	R1.	RC, BA, GO, GOP, TO, TOP, DP	Х	
CIP-007-6	R1.1.	RC, BA, GO, GOP, TO, TOP, DP	Х	
CIP-007-6	R1.2.	RC, BA, GO, GOP, TO, TOP, DP	Х	
CIP-007-6	R2.	RC, BA, GO, GOP, TO, TOP, DP	Х	
CIP-007-6	R2.1.	RC, BA, GO, GOP, TO, TOP, DP	Х	
CIP-007-6	R2.2.	RC, BA, GO, GOP, TO, TOP, DP	Х	
CIP-007-6	R2.3.	RC, BA, GO, GOP, TO, TOP, DP	Х	
CIP-007-6	R2.4.	RC, BA, GO, GOP, TO, TOP, DP	Х	
CIP-007-6	R3.	RC, BA, GO, GOP, TO, TOP, DP	Х	
CIP-007-6	R3.1.	RC, BA, GO, GOP, TO, TOP, DP	Х	
CIP-007-6	R3.2.	RC, BA, GO, GOP, TO, TOP, DP	Х	

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#### 2020 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
CIP-007-6	R3.3.	RC, BA, GO, GOP, TO, TOP, DP	X	
CIP-010-2	R1.	RC, BA, GO, GOP, TO, TOP, DP	X	
CIP-010-2	R1.1.	RC, BA, GO, GOP, TO, TOP, DP	Х	
CIP-010-2	R1.2.	RC, BA, GO, GOP, TO, TOP, DP	Х	
CIP-010-2	R1.3.	RC, BA, GO, GOP, TO, TOP, DP	Х	
CIP-010-2	R1.4.	RC, BA, GO, GOP, TO, TOP, DP	Х	
CIP-010-2	R1.5.	RC, BA, GO, GOP, TO, TOP, DP	Х	
CIP-010-2	R4.	RC, BA, GO, GOP, TO, TOP, DP	Х	
CIP-011-2	R1.	RC, BA, GO, GOP, TO, TOP, DP	Х	
CIP-011-2	R1.1.	RC, BA, GO, GOP, TO, TOP, DP	Х	
CIP-011-2	R1.2.	RC, BA, GO, GOP, TO, TOP, DP	Х	
CIP-014-2	R1.	ТО	Х	
CIP-014-2	R1.2.	ТО	Х	
CIP-014-2	R2.	ТО	Х	
CIP-014-2	R2.1.	ТО	Х	
CIP-014-2	R2.2.	ТО	Х	
CIP-014-2	R2.3.	ТО	Х	

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#### 2020 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
CIP-014-2	R2.4.	ТО	X	
CIP-014-2	R3.	ТО	X	
CIP-014-2	R3.1.	ТО	Х	
CIP-014-2	R4.	ТО	Х	
CIP-014-2	R4.1.	ТО	Х	
CIP-014-2	R4.2.	ТО	Х	
CIP-014-2	R4.3.	ТО	Х	
CIP-014-2	R5.	ТО	Х	
CIP-014-2	R5.1.	ТО	Х	
CIP-014-2	R5.2.	ТО	Х	
CIP-014-2	R5.3.	ТО	Х	
CIP-014-2	R5.4.	ТО	Х	
CIP-014-2	R6.	ТО	Х	
CIP-014-2	R6.1	ТО	Х	
CIP-014-2	R6.2.	ТО	Х	
CIP-014-2	R6.3.	ТО	Х	
CIP-014-2	R6.4.	ТО	Х	

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#### 2020 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
FAC-003-4	R1.	TO, GO	X	Quarterly
FAC-003-4	R1.1	TO, GO	X	Quarterly
FAC-003-4	R1.2	TO, GO	Х	Quarterly
FAC-003-4	R1.3.	TO, GO	Х	Quarterly
FAC-003-4	R1.4.	TO, GO	Х	Quarterly
FAC-003-4	R2.	TO, GO	Х	Quarterly
FAC-003-4	R2.1.	TO, GO	Х	Quarterly
FAC-003-4	R2.2.	TO, GO	Х	Quarterly
FAC-003-4	R2.3.	TO, GO	Х	Quarterly
FAC-003-4	R2.4.	TO, GO	Х	Quarterly
FAC-003-4	R3.	TO, GO	Х	
FAC-003-4	R3.1.	TO, GO	Х	
FAC-003-4	R3.2.	TO, GO	Х	
FAC-003-4	R6.	TO, GO	Х	
FAC-003-4	R7.	TO, GO	Х	
FAC-003-4	R7.1.	TO, GO	Х	
FAC-003-4	R7.2.	TO, GO	Х	

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#### 2020 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
FAC-003-4	R7.3.	TO, GO	X	
FAC-003-4	R7.4.	TO, GO	X	
FAC-003-4	R7.5.	TO, GO	Х	
FAC-003-4	R7.6.	TO, GO	Х	
FAC-003-4	R7.7.	TO, GO	Х	
FAC-003-4	R7.8.	TO, GO	Х	
FAC-003-4	R7.9.	TO, GO	Х	
FAC-008-3	R6.	GO, TO	Х	
IRO-008-2	R4.	RC	Х	
PRC-001-1.1(ii)	R5.	GOP, TOP	Х	
PRC-001-1.1(ii)	R5.1.	GOP	Х	
PRC-004-5(i)	R1.	TO, GO, DP	Х	
PRC-004-5(i)	R1.1.	TO, GO, DP	Х	
PRC-004-5(i)	R1.2.	TO, GO, DP	Х	
PRC-004-5(i)	R1.3.	TO, GO, DP	Х	
PRC-004-5(i)	R3.	TO, GO, DP	Х	
PRC-004-5(i)	R4.	TO, GO, DP	Х	

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#### 2020 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-004-5(i)	R5.	TO, GO, DP	X	
PRC-004-5(i)	R6.	TO, GO, DP	X	
PRC-004-WECC-2	R3.	GO, TO		Quarterly
PRC-004-WECC-2	R3.1.	GO, TO		Quarterly
PRC-004-WECC-2	R3.2.	GO, TO		Quarterly
PRC-005-2(i)	R3.	TO, GO, DP	Х	
PRC-019-2	R1.	GO, TO	Х	
PRC-019-2	R1.1.	GO, TO	Х	
PRC-019-2	R1.1.1.	GO, TO	Х	
PRC-019-2	R1.1.2.	GO, TO	Х	
PRC-019-2	R2.	GO, TO	Х	
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
PRC-021-1	R1.5.	DP, TO		Yearly

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#### 2020 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-023-4	R1.	TO, GO, DP	X	
PRC-023-4	R2.	TO, GO, DP	X	
PRC-023-4	R5.	TO, GO, DP	X	
PRC-024-2	R1.	GO	Х	
PRC-024-2	R2.	GO	Х	
TOP-006-2	R1.	BA, TOP, GOP	Х	
TOP-006-2	R1.1.	GOP	Х	
TOP-006-2	R1.2.	BA, TOP	Х	
TOP-006-2	R2.	BA, TOP	Х	
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-501-WECC-2	R1.	GOP		Quarterly
VAR-501-WECC-2	R1.1.	GOP		Quarterly
VAR-501-WECC-2	R1.2.	GOP		Quarterly
VAR-501-WECC-2	R1.3.	GOP		Quarterly

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#### 2020 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-501-WECC-2	R1.4.	GOP		Quarterly
VAR-501-WECC-2	R1.5.	GOP		Quarterly
VAR-501-WECC-2	R1.6.	GOP		Quarterly
VAR-501-WECC-2	R1.7.	GOP		Quarterly
VAR-501-WECC-2	R1.8.	GOP		Quarterly
VAR-501-WECC-2	R1.9.	GOP		Quarterly
VAR-501-WECC-2	R1.10.	GOP		Quarterly
VAR-501-WECC-2	R1.11.	GOP		Quarterly
VAR-501-WECC-2	R1.12.	GOP		Quarterly

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## **BC Actively Monitored Standards List Revision History for 2020**

Revision Number	Description				
0	Initial version.				

## 2020 Audit Schedule for British Columbia

WECC ID	ACRONYM	REGISTERED ENTITY NAME		AUDIT TYPE	BEGIN DATE	END DATE	LOCATION
WCR0029	TMGP	Toba Montrose General Partnership		Off-site	04/20/2020	04/24/2020	WECC Offices
WCR0037	VIPL	V.I. Power Limited Partnership		Off-site	05/04/2020	05/08/2020	WECC Offices
WCR0050	CMHL	Coast Mountain Hydro Limited Partnership	O&P CIP	Off-site	07/27/2020	07/31/2020	WECC Offices
WCR0030	CPCD	Catalyst Paper – Crofton Division		Off-site	08/24/2020	08/28/2020	WECC Offices
WCR0032	CPPAD	Catalyst Paper – Port Alberni Division		Off-site	08/24/2020	08/28/2020	WECC Offices
WCR0033	CPPR	Catalyst Paper – Powell River Division		Off-site	08/24/2020	08/28/2020	WECC Offices
WCR0003	ВСНА	British Columbia Hydro and Power Authority		On-site	09/21/2020	10/02/2020	Langley, BC
WCR0039	DGP	Dokie General Partnership		Off-site	11/02/2020	11/07/2020	WECC Offices

Entities will be audited for all registered functions.