



April 24, 2020

Sent via email

Letter L-22-20

Ms. Patricia Robertson
Reliability Compliance Manager
British Columbia Hydro and Power Authority
333 Dunsmuir Street
Fraser Valley Office
Vancouver, BC V6B 5R3
Patricia.Robertson@bchydro.com

Re: British Columbia Hydro and Power Authority – Extension Request for the Mitigation Plan for Mandatory Reliability Standard: FAC-008-3 Requirement 6 – Violation ID: BCUC2017000621

Dear Ms. Robertson:

This letter is in response to your March 18, 2020 submission requesting a further extension of the proposed completion date for the Mitigation Plan (MP) addressing the Possible Violation identified above.

The British Columbia Utilities Commission (BCUC), by Order G-123-09, approved the Compliance Monitoring Program (CMP) for monitoring and enforcement of adopted reliability standards and appointed the Western Electricity Coordinating Council (WECC) as its Administrator for registration and monitoring compliance. WECC's role as Administrator for the BC Mandatory Reliability Standards (MRS) Program was most recently renewed in the second amended Administration Agreement, dated July 5, 2019 and the CMP was revised and updated by Order R-40-17, dated September 1, 2017.

The CMP requires an entity subject to the adopted Mandatory Reliability Standards (Entity) to file an MP when an Alleged Violation is confirmed by the BCUC. An Entity may also elect, at any time, to file an MP for a Possible Violation or an Alleged Violation, whereby the Entity outlines how it plans to achieve compliance. Pursuant to section 5.4 of the CMP, the BCUC may, at the request of the Entity, extend the MP completion deadline.

The BCUC, by Order R-11-19, dated May 14, 2019, approved the MP for British Columbia Hydro and Power Authority (BC Hydro). On December 20, 2020, BC Hydro submitted a request for an extension of the proposed MP completion date from December 31, 2019 to March 31, 2020. By email correspondence dated February 13, 2020, WECC recommended acceptance of the extension request and by letter dated February 24, 2020 the BCUC approved the extension. Details of the MP are summarized below:

Reliability Standard	Violation ID	MP Approval	Proposed Completion Date
FAC-008-3 R6	BCUC2017000621	R-11-19	March 31, 2020

On March 18, 2020, BC Hydro submitted a request for a further extension of the completion date for the MP addressing the Possible Violation noted above from March 31, 2020 to June 30, 2020.

Following a thorough review of BC Hydro's request, WECC, by email dated April 8, 2020, recommended the BCUC accept the request for a further extension of the MP addressing the Possible Violation as set out below:

Reliability Standard	Violation ID	Extension Request Submitted	New Completion Date
FAC-008-3 R6	BCUC2017000621	March 18, 2020	June 30, 2020

The BCUC, having reviewed BC Hydro's extension request and WECC's recommendation, accepts the request to extend the MP completion date from March 31, 2020 to June 30, 2020 given the unique circumstances and the various BCUC regulatory processes currently underway involving BC Hydro. However, the BCUC expects that any matters identified in the MP are being adequately addressed and mitigated in a timely manner to ensure the integrity of the bulk electric system (BES).

In the circumstances, the BCUC also requests that BC Hydro submit a report that confirms there are no unmanaged or immediate risks to the BES while it is in the process of completing the MP for FAC-008-3 R6. Please provide this report no later than 15 days from the date of this letter.

Further, going forward the BCUC reminds BC Hydro it is expected to complete MPs by the required date given the importance of addressing such matters to the integrity of the BES.

Sincerely,

Original signed by:

Patrick Wruck
Commission Secretary

NM/jo

cc: British Columbia Hydro and Power Authority
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