



ORDER NUMBER
R-29-24

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

and

2025 Implementation Plan for Monitoring Compliance
with British Columbia Reliability Standards

BEFORE:

E. A. Brown, Commissioner
A. K. Fung, KC, Commissioner
E. B. Lockhart, Commissioner

on December 18, 2024

ORDER

WHEREAS:

- A. On October 31, 2024, the Western Electricity Coordinating Council (WECC) submitted the 2025 Implementation Plan for Monitoring Compliance with British Columbia Reliability Standards (2025 Implementation Plan) to the British Columbia Utilities Commission (BCUC) for approval;
- B. On October 15, 2009, by Order G-123-09, the BCUC 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 the 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 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 amended most recently on July 2, 2024;
- 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 has reviewed and considered the 2025 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 2025 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 2025 Implementation Plan, unless otherwise ordered by the BCUC.
3. As new and revised Reliability 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.

DATED at the City of Vancouver, in the Province of British Columbia, this 18th day of December 2024.

BY ORDER

Electronically signed by Blair Lockhart

E. B. Lockhart
Commissioner

Attachment



bcuc
British Columbia
Utilities Commission



Electric Reliability and Security for the West

**British Columbia
Utilities Commission
(BCUC)**

**Western Electricity
Coordinating Council
(WECC)**

**2025 Implementation Plan
for Monitoring Compliance with
British Columbia Reliability Standards**

October 31, 2024

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Appendices

Appendix A – Actively Monitored Standards List

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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.

WECC staff works with the 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 2025.

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.

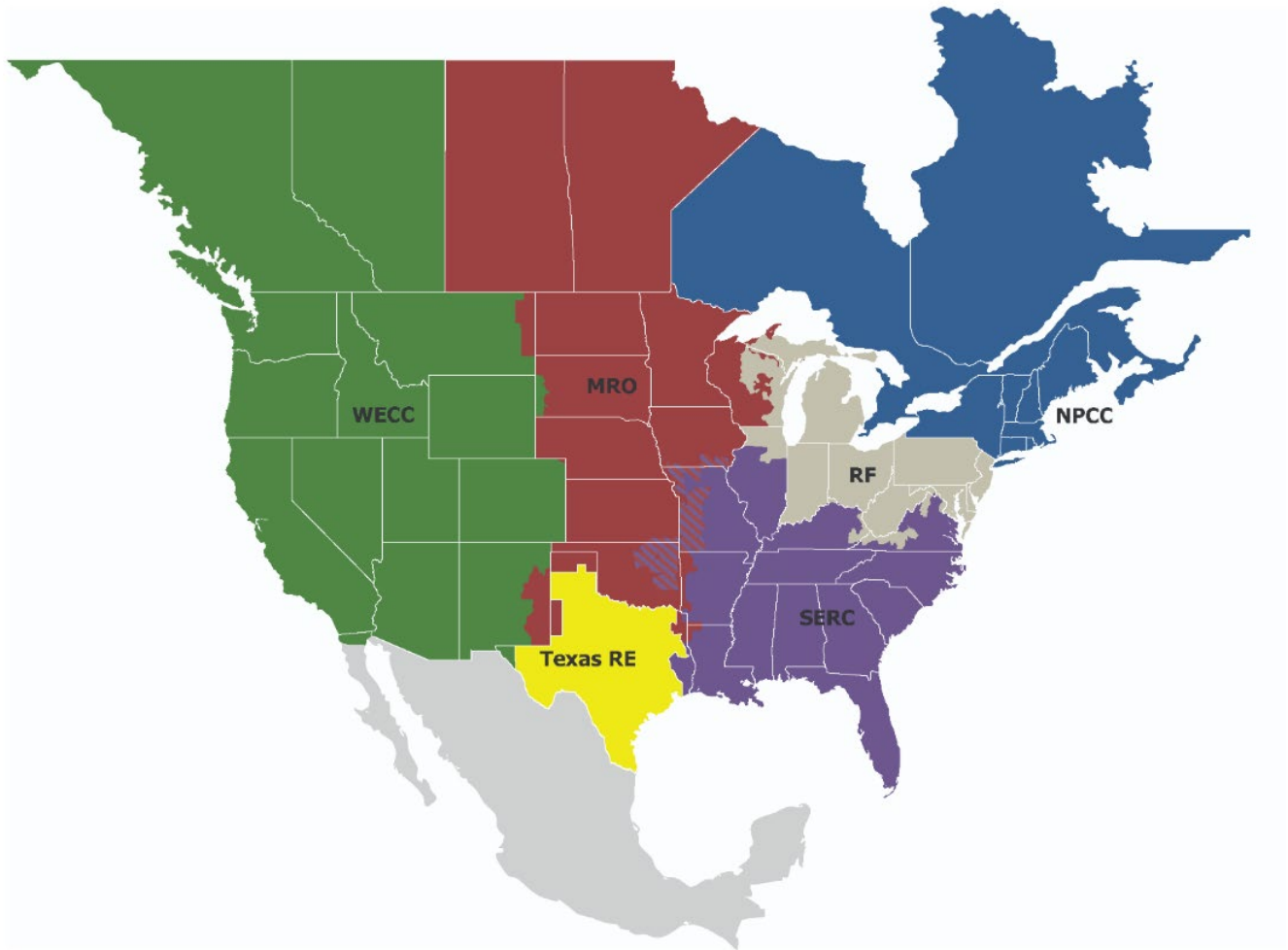
This Implementation Plan includes references to the Open Access Technology International, Inc. (OATI) Compliance Data Management System (webCDMS) and the Secure Workspace for electronic submittal and distribution of documents. webCDMS is WECC's current primary compliance data system used for compliance monitoring processes in BC and the Secure

Workspace is used as a file upload solution for Audits and Spot-Checks, as well as ad hoc requests. Align and the Secure Evidence Locker (SEL) are the new ERO Enterprise software platforms for tracking and processing compliance monitoring and enforcement activities. The BCUC is considering arrangements for the adoption of Align in BC. The North American Electric Reliability Corporation (NERC) owns, develops, and maintains Align and the SEL in partnership with WECC and stakeholders across North America.

For convenient reference, webCDMS usage details are available on the WECC website at: <https://www.wecc.org/program-areas/compliance/compliance-british-columbia>. The Secure Workspace usage details are available on the WECC website at: <https://www.wecc.org/wecc-document/9486>

2. Compliance Monitoring Program Administrator (WECC)

2.1 WECC Operating Area



3. Program Implementation – Monitoring

WECC 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 Compliance Monitoring Program and the monitoring processes specified therein, as outlined below. In addition, WECC acknowledges that information meeting the definitions of Confidential Information or Personal Information in the Rules of Procedure must be handled in accordance with section 6 of the Rules of Procedure.

Reliability Standards adopted by the BCUC can be accessed from the BCUC website or found using the following link: <https://www.wecc.org/program-areas/standards>

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 "Compliance Audit." Compliance Audits may include a review of any matters subject to a Spot-Check or 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 or reduce the audit scope if it determines such an expansion or reduction 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) calendar 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 team and their recent employment history; and

3) request information from the Entity.

Reliability Standards Audit Worksheets (RSAWs) for those Reliability Standards selected for audit in 2025 will be provided to the Entities with the Notice of Compliance Audit.

During the compliance audit engagement, compliance auditors may identify areas that are not findings of noncompliance, but are valuable 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, if not addressed, could develop into future noncompliance or risk to the Bulk Power System (BPS). Ineffective or nonexistent internal controls may contribute to an area of concern.
- Recommendations are suggested improvements in the compliance program, control-related processes, procedures, or tools to enhance the reliability, security, or resiliency of the BES. Opportunities for process improvements should be shared with the registered Entity.

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) calendar 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

A guided Self-Certification is a monitoring method where an Entity completes a self-assessment of its compliance with applicable Reliability Standards and submits substantiating evidence validating compliance. In 2024, a guided Self-Certification process was used for smaller functional entities in BC in lieu of a Compliance Audit. In 2025, WECC will conduct planned compliance audits for applicable functional entities. No Self-Certifications will be conducted in BC in 2025.

Section 2.2. of the Compliance Monitoring Program provides information about Self-Certifications.

The webCDMS Regional Entity Quick Start Guide provides information concerning the Self-Certification submittal process.

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) calendar 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 further 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 further information about Compliance Violation Investigations.

3.5 Self-Reports

Entities are encouraged to file Self-Reports with WECC on a timely basis 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 facts and circumstances of the issue and determined that a potential non-compliance of a Reliability Standard has occurred. Entities are encouraged to complete this evaluation as soon as possible to ensure timely reporting regardless of whether the Reliability Standard requires reporting on a pre-defined schedule, such as through Periodic Data Submittals. A Self-Report must include details and evidence of the potential non-compliance.

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 BC 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 further 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 Reliability Standard. Entities are required to provide to WECC Periodic Data Submittals for 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) calendar 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 BC 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 further 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 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 2025.

4.1 Actively Monitored Reliability Standards

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 Reliability Standards may be added to the Actively Monitored Standards List for monitoring in the same manner as the Reliability Standards and requirements they are replacing for the appropriate time period.

The Actively Monitored Standards List for BC 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 elements of NERC’s areas of focus by using its annual Compliance Monitoring and Enforcement Program Implementation Plan

regarding those Reliability Standards and requirements related to industry and regional perspectives on greater risks to the reliability of the BPS.

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

WECC will consider all evidence provided in conjunction with a Possible Violation with a Reliability Standard and will proceed as follows, unless ordered otherwise by the BCUC.

- 5.1.1 If WECC considers that there is no evidence to substantiate a Possible Violation, no further process applies and WECC will notify the Entity and the BCUC that the Possible Violation is dismissed and no further action is required.
- 5.1.2 If WECC identifies a Possible Violation as one that may be processed under the BC Find, Fix, Track (FFT) Process, WECC will follow the BC FFT Process described in section 4.2 of the Compliance Monitoring Program.
- 5.1.3 If WECC identifies a Possible Violation as one that may not be processed under the BC FFT Process, WECC 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, WECC 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 BCUC 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 BCUC.

- 5.2.1 WECC will perform an FFT review on a Possible Violation before considering following the Alleged Violation Process in section 4.3 of the Compliance Monitoring Program.
- 5.2.2 Unless the BCUC orders that other factors are to be considered, WECC will consider the following in performing an FFT review:

- 1) The specific Reliability Standard(s) possibly violated;
 - 2) The facts and circumstances (i.e., what happened, how, where and when) of the Possible Violation;
 - 3) The extent of the condition (how far reaching) of the Possible Violation.
 - 4) The underlying cause(s) of the Possible Violation.
 - 5) The assessment of potential and actual level of risk to reliability of the bulk power system, including mitigating factors during the period of Possible Violation;
 - 6) Whether the Entity has mitigated or begun mitigation of the Possible Violation or not.
 - a. Mitigation may be documented through Mitigating Activities or a Mitigation Plan. Activities related to the remediation efforts must be explicitly articulated.
 - b. Mitigating Activities may or may not be complete at the time the Entity provides the information to WECC. Mitigating Activities are generally less complex and therefore a formal Mitigation Plan is not necessary.
 - c. Mitigating Activities or Mitigation Plan for a Possible Violation in the BC FFT Process generally requires the expected mitigation completion be within three (3) months of submittal.
 - 7) Information WECC may have about the perceived strength of the Entity's compliance program; including compensating measures, internal controls and culture of compliance;
 - 8) Information that WECC may have about the Entity's compliance history; and
 - 9) Whether aggravating factors are present. The presence of such may warrant the escalation of a Possible Violation to an Alleged Violation.
- 5.2.3 WECC will notify the BCUC and the Entity in writing that it will follow the BC FFT Process. If, within thirty (30) calendar days after that notice is sent, either: (a) the BCUC directs WECC to proceed under any other process, or (b) the Entity provides a written request to WECC, with a copy to the BCUC, requesting that the Alleged Violation Process be followed instead, then WECC will instead follow the Alleged Violation Process or such other process the BCUC may direct.
- 5.2.4 Unless the BCUC 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 BCUC 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 WECC, or a description of how the Possible Violation will be mitigated through Mitigating Activities, within thirty (30) calendar days after WECC notifies the Entity that it will follow the BC FFT Process. The provisions of section 5.0 of the Compliance Monitoring Program regarding Mitigation Plans are applicable.
- 5.2.6 In order for a Possible Violation to be considered resolved through the BC FFT Process, an Entity must provide an Attestation acceptable to WECC describing the remediation work completed along with supporting evidence.
- 5.2.7 The BCUC will consider a Possible Violation matter closed when WECC reports it to the BCUC as a Remediated FFT Issue, unless the BCUC provides notice to WECC and the Entity at any time that further review will be required.
- 5.2.8 WECC will report items processed as FFTs to the BCUC within thirty (30) calendar days of notifying an Entity of an FFT.
- 5.2.9 If at any point it appears to the BCUC that Remediated FFT Issue status was achieved on the basis of a material misrepresentation of facts, the BCUC may remand the Remediated FFT Issue and direct WECC to process 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 a misrepresentation may be considered by the BCUC in determining any sanctions that the BCUC may determine to be applicable.
- 5.2.10 The BCUC 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 cybersecurity incident or would jeopardize the security of the bulk power system.
- 5.2.11 If WECC identifies a Possible Violation as not one that WECC would process 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 and Authorizing Officer.

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 demonstrates or constitutes the Alleged Violation;
- A description of the severity of the Alleged Violation;
- A description of the cause(s) of the Alleged Violation;
- Reference Violation Risk Factor (VRF) and Violation Severity Level (VSL) factors relevant to the circumstances of the Alleged Violation.
- WECC's risk assessment of the Alleged Violation based on the facts and evidence.
- A description of the accepted Mitigation Plan for the Alleged Violation, if already submitted to WECC;
- 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:
 - i. 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 Compliance Monitoring Program; and
 - ii. the processes associated with submission of Mitigation Plans, as described in Section 5.0 of the Compliance Monitoring Program, if applicable.

Section 4.3 of the Compliance Monitoring Program provides further 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 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 further 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 regarding 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 or other monitoring efforts, to monitor implementation.

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

WECC may offer mitigation assistance to an Entity if the Alleged Violation is of serious risk to the bulk power system and the cause appears to be a systemic failure of an Entity's implementation of a Reliability Standard and requirement(s) and/or a programmatic failure of the Entity's compliance program. The level of mitigation assistance offered will be at WECC's discretion unless otherwise directed by the BCUC.

6.3 Completion of Mitigation Plans

Upon completion of a Mitigation Plan, the Entity must provide attestation as soon as reasonably possible 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 or other monitoring efforts 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 to the BCUC recommending approval. 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 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 works 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
- Reliability and Security Oversight Monthly Updates
- webCDMS and Secure Workspace Training
- 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 BPS 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 oversight@wecc.org.

Additional information can be found on the WECC Outreach home page using the following link: <https://www.wecc.org/program-areas/training-and-outreach>

7.1 Reliability and Security Workshops

The WECC Reliability & Security Workshops provide in-depth education and training through presentations, expert panel discussions, interactive dialogue in open forum, question and answer sessions, and networking opportunities. Meeting topics include: continued lessons learned and process improvement for implementation of risk-based concepts in the NERC Compliance Monitoring and Enforcement Program; enforcement trends and statistics; and, information on audit approach for upcoming Operations and Planning (O&P) Reliability Standards and Critical Infrastructure Protection (CIP) Reliability Standards changes and transitions.

Reliability and Security Workshops are held annually, in the spring and fall, in cities in the West.

7.2 webCDMS and Secure Workspace Training

WECC offers training to Entities on changes or enhancements made to the webCDMS and Secure Workspace processes. WECC will also provide training on Align and the SEL in the near future. Periodic updates may be provided during the Reliability and Security Oversight Monthly Update.

The webCDMS Regional Entity Quick Start Guide provides information on how to navigate and report compliance data through webCDMS.

Questions concerning webCDMS or Secure Workspace processes should be directed to oversight@wecc.org. Assistance with webCDMS or the Secure Workspace is also available by telephone at (801) 883-6879.

7.3 Reliability and Security Oversight Monthly Update

The Reliability and Security Oversight Monthly Update provides an opportunity for open discussion regarding pre-determined Reliability Standards and compliance topics. They are followed by an open Q&A period. All Entities are invited and encouraged to participate, along with WECC Reliability and Security Oversight 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 Reliability and Security Oversight staff directly. WECC records the Reliability and Security Oversight Monthly Updates and provides access to these recordings on its website for a thirty (30) day period following the calls.

Reliability and Security Oversight Monthly Updates 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 Subject Matter Experts exhibit the highest level of expertise in performing the Reliability Standards audit and investigation processes, as well as the violation review 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 and mitigation of non-compliance.

7.5 Compliance Questions and Answers

The WECC Reliability and Security Oversight department appreciates the need for Entities to pose compliance-related questions. WECC has set up the oversight@wecc.org 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 call is preferred to an email, calls made to (801) 883-6879 are answered and forwarded to the appropriate WECC staff member or Subject Matter Expert.

2025 ACTIVELY MONITORED STANDARDS LIST FOR BC

- 1) This Actively Monitored Standards List reflects BCUC-approved Reliability Standards that have been selected for particular monitoring in 2025 as set forth in the 2025 Implementation Plan for BC.
- 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 BC Reliability Standards below.
- 3) As revised and additional BC Reliability Standards are approved by the BCUC, revised and additional BC Reliability Standards and requirements may be applicable to this list for particular monitoring in the same manner as those BC Reliability Standards and requirements they may be replacing.

| BCUC-approved Reliability Standard | Reliability Standard Requirement | List of Functions Monitored in BC | Compliance Audit (X) | Scheduled Periodic Data Submittals |
|------------------------------------|----------------------------------|-----------------------------------|----------------------|------------------------------------|
| 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 | X | |
| CIP-002-5.1a | R1.3. | RC, BA, GO, GOP, TO, TOP, DP | X | |
| CIP-002-5.1a | R2. | RC, BA, GO, GOP, TO, TOP, DP | X | |
| CIP-002-5.1a | R2.1. | RC, BA, GO, GOP, TO, TOP, DP | X | |
| CIP-002-5.1a | R2.2. | RC, BA, GO, GOP, TO, TOP, DP | X | |
| CIP-003-8 | R1. | RC, BA, GO, GOP, TO, TOP, DP | X | |

2025 ACTIVELY MONITORED STANDARDS LIST FOR BC

| BCUC-approved Reliability Standard | Reliability Standard Requirement | List of Functions Monitored in BC | Compliance Audit (X) | Scheduled Periodic Data Submittals |
|------------------------------------|----------------------------------|-----------------------------------|----------------------|------------------------------------|
| CIP-003-8 | R1.2. | RC, BA, GO, GOP, TO, TOP, DP | X | |
| CIP-003-8 | R1.2.1. | RC, BA, GO, GOP, TO, TOP, DP | X | |
| CIP-003-8 | R1.2.2. | RC, BA, GO, GOP, TO, TOP, DP | X | |
| CIP-003-8 | R1.2.3. | RC, BA, GO, GOP, TO, TOP, DP | X | |
| CIP-003-8 | R1.2.4. | RC, BA, GO, GOP, TO, TOP, DP | X | |
| CIP-003-8 | R1.2.5. | RC, BA, GO, GOP, TO, TOP, DP | X | |
| CIP-003-8 | R1.2.6. | RC, BA, GO, GOP, TO, TOP, DP | X | |
| CIP-003-8 | R2. | RC, BA, GO, GOP, TO, TOP, DP | X | |
| CIP-003-8 | R2. Attachment 1, Section 1 | RC, BA, GO, GOP, TO, TOP, DP | X | |
| CIP-003-8 | R2. Attachment 1, Section 2 | RC, BA, GO, GOP, TO, TOP, DP | X | |
| CIP-003-8 | R2. Attachment 1, Section 3 | RC, BA, GO, GOP, TO, TOP, DP | X | |
| CIP-003-8 | R2. Attachment 1, Section 4 | RC, BA, GO, GOP, TO, TOP, DP | X | |
| CIP-003-8 | R2. Attachment 1, Section 5 | RC, BA, GO, GOP, TO, TOP, DP | X | |

2025 ACTIVELY MONITORED STANDARDS LIST FOR BC

| BCUC-approved Reliability Standard | Reliability Standard Requirement | List of Functions Monitored in BC | Compliance Audit (X) | Scheduled Periodic Data Submittals |
|------------------------------------|----------------------------------|-----------------------------------|----------------------|------------------------------------|
| FAC-003-4 | R1. | GO, TO | | Quarterly |
| FAC-003-4 | R1.1 | GO, TO | | Quarterly |
| FAC-003-4 | R1.2 | GO, TO | | Quarterly |
| FAC-003-4 | R1.3. | GO, TO | | Quarterly |
| FAC-003-4 | R1.4. | GO, TO | | Quarterly |
| FAC-003-4 | R2. | GO, TO | | Quarterly |
| FAC-003-4 | R2.1. | GO, TO | | Quarterly |
| FAC-003-4 | R2.2. | GO, TO | | Quarterly |
| FAC-003-4 | R2.3. | GO, TO | | Quarterly |
| FAC-003-4 | R2.4. | GO, TO | | Quarterly |
| FAC-008-5 | R6. | GO, TO | X | |
| MOD-025-2 | R1. | GO, TO | X | |
| MOD-025-2 | R2. | GO, TO | X | |

2025 ACTIVELY MONITORED STANDARDS LIST FOR BC

| BCUC-approved Reliability Standard | Reliability Standard Requirement | List of Functions Monitored in BC | Compliance Audit (X) | Scheduled Periodic Data Submittals |
|------------------------------------|----------------------------------|-----------------------------------|----------------------|------------------------------------|
| MOD-026-1 | R2. | GO, TP | X | |
| MOD-027-1 | R2. | GO, TP | X | |
| PRC-002-2 | R2. | RC, GO, TO | X | |
| PRC-002-2 | R3. | RC, GO, TO | X | |
| PRC-002-2 | R7. | RC, GO, TO | X | |
| PRC-002-2 | R8. | RC, GO, TO | X | |
| PRC-005-6 | R3. | TO, GO, DP/DP UFLS-Only | X | |
| PRC-024-3 | R1. | GO | X | |
| PRC-024-3 | R2. | GO | X | |
| PRC-027-1 | R1. | GO, TO, DP | X | |
| PRC-027-1 | R2. | GO, TO, DP | X | |

<Limited-Disclosure>

BC Actively Monitored Standards List Revision History for 2025

| Revision Number | Description |
|-----------------|------------------|
| 0 | Initial version. |
| | |

2025 Audit Schedule for British Columbia

| WECC ID | ACRONYM | REGISTERED ENTITY NAME | TEAM TYPE | AUDIT TYPE | BEGIN DATE | END DATE | LOCATION |
|---------|---------|--|-----------|------------|------------|--------------|----------|
| WCR0012 | BMWL | Bear Mountain Wind Limited Partnership (GO/GOP)* | O&P | Off-site | 06/23/2025 | 7/11/2025** | Remote |
| | | | CIP | | | | |
| WCR0049 | CSCO | Cape Scott Wind LP (GO/GOP)* | O&P | Off-site | 10/06/2025 | 10/24/2025** | Remote |
| | | | CIP | | | | |
| WCR0022 | TIL | Tolko Industries Limited (DP/GO/GOP)* | O&P | Off-site | 10/27/2025 | 11/07/2025 | Remote |
| | | | CIP | | | | |

Entities will be audited for all registered functions.

* GO: Generator Owner

* GOP: Generator Operator

* DP: Distribution Provider

** Extended timeline considering holidays for the U.S. and Canada