



ORDER NUMBER
R-33-22

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

and

British Columbia Utilities Commission
Mandatory Reliability Standards Planning Coordinator Function Registration
and Planning Coordinator Issues

BEFORE:

A. K. Fung, KC, Panel Chair
C. M. Brewer, Commissioner
W. M. Everett, KC, Commissioner

on October 18, 2022

ORDER

WHEREAS:

- A. By Order R-8-22 dated March 14, 2022, the British Columbia Utilities Commission (BCUC) established a regulatory timetable for a proceeding to review the Planning Coordinator (PC) Function Registration and Planning Coordinator Issues brought forward by the British Columbia Hydro and Power Authority (BC Hydro) and interveners registered in the currently adjourned Assessment Report Proceeding for Reliability Standards applicable to the PC function (PC Assessment Report Proceeding);
- B. On May 31, 2021, BC Hydro submitted to the BCUC, in the PC Assessment Report Proceeding, a Mandatory Reliability Standards (MRS) Planning Coordinator Assessment Report (PC Assessment Report).
- C. On June 25, 2021, BC Hydro filed, in the PC Assessment Report Proceeding, its proposed implementation approach (Implementation Approach) providing information regarding its anticipated timing to register as a PC for its own Bulk Power Electric System assets only and to engage other entities registered in the British Columbia Mandatory Reliability Standard (MRS) Program (Entities) that are interconnected to the BC Hydro system on the potential for BC Hydro to provide PC service to those Entities;
- D. BC Hydro made a submission, in the PC Assessment Report Proceeding, recommending the PC Assessment Report Proceeding be adjourned and a new proceeding be established to address whether a single-PC model or multi-PC model is desirable in the province and to identify the appropriate Entity or Entities to register as PC(s) (PC Issues). Intervenors in the PC Assessment Report Proceeding agreed that the BCUC should suspend the proceeding to review the PC Assessment Report and establish a new proceeding to address the PC Issues;

- E. By Order R-4-22 dated January 26, 2022, the BCUC adjourned the PC Assessment Report Proceeding and recommended the initiation of this separate proceeding to review the PC Function Registration and PC Issues;
- F. FortisBC Inc. (FBC), BC Hydro, Movement of United Professionals (MOVEUP), Commercial Energy Consumers Association of British Columbia (CEC), Residential Consumer Intervener Association (RCIA) and Cape Scott Wind LP (CSWLP) have registered as interveners (collectively Interveners) in this proceeding to review the PC Function Registration and PC Issues;
- G. On April 28, 2022, the BCUC issued a letter to Interveners amending the regulatory timetable established by Order R-8-22 and requesting written submissions regarding the Transmission Planner mapping exercise (Transmission Planner Mapping), among other things (Intervener Request). On May 19, 2022, each of FBC, BC Hydro, CEC and RCIA filed responses to the Intervener Request (Intervener Submissions);
- H. On June 27, 2022, Interveners filed replies to the initial Intervener Submissions. The Interveners agreed that the Transmission Planner Mapping should occur prior to addressing the PC Issues;
- I. On July 8, 2022, BC Hydro submitted a letter stating that it has rejected 15 Entities that have mapped to BC Hydro as a Transmission Planner;
- J. On July 15, 2022, Western Electricity Coordinating Council (WECC) submitted the results of the Transmission Planner Mapping in a report to the BCUC (TP Report). The TP Report identifies gaps with Entities' having no functional relationships to a registered Transmission Planner, specifically with BC Hydro, which could result in failure to coordinate and exchange planning information as specified in the adopted Reliability Standards;
- K. By Order R-23-22 dated July 29, 2022, the BCUC amended the regulatory timetable to include one round of information requests to WECC and Interveners (IR No. 1). On October 3, 2022 WECC and Interveners filed their responses to IR No. 1;
- L. BC Hydro provides that there are data exchange processes in place with third-parties interconnected to its transmission system. BC Hydro states that the data is required for BC Hydro as its own Transmission Planner to plan, build, operate and maintain the BC Hydro transmission system, and are not designed to fulfill the Transmission Planner function for other Entities. BC Hydro also provides that while it has entered into different types of agreements with interconnected parties, it does not have any specific agreements with Entities that contemplate an assignment of compliance responsibility for any MRS functions;
- M. CSWLP is registered as a Generator Owner in the MRS Program and provides that its generation facilities are solely and directly connected to the BC Hydro bulk transmission system; therefore, there is no practicable alternative to BC Hydro performing the Transmission Planner function. CSWLP also affirms that it has submitted data to and received data from BC Hydro as a Transmission Planner as required by applicable reliability standards;
- N. WECC provides that compliance risk with the Transmission Planner and Generator Owner/Transmission Owner/Distribution Provider relationship is associated with the failure to provide data specified in the reliability standards. Data required by the Transmission Planner is data it requires to comply with the applicable reliability standards. Most of the data exchange addressed by the standards is based on a "request" by the Transmission Planner. If there is no request, there can be no obligation to provide the data, in which case, neither party is subject to non-compliance; and

- O. The BCUC has reviewed IR No. 1 responses and determines that the establishment of a further regulatory timetable is warranted.

NOW THEREFORE the BCUC orders the following:

1. BC Hydro is directed to file written submissions on the following:
 - Based on the parties' IR No. 1 responses, explain why it should not be the Transmission Planner for Entities interconnected to its transmission system; and
 - Describe how BC Hydro proposes to manage the risks to the bulk electric system should BC Hydro not be the Transmission Planner for Entities already physically interconnected to its transmission system.
2. The regulatory timetable is amended as set out in Appendix A to this Order.

DATED at the City of Vancouver, in the Province of British Columbia, this 18th day of October 2022.

BY ORDER

Original signed by:

A. K. Fung, KC
Commissioner

Attachment

British Columbia Utilities Commission
Mandatory Reliability Standards Planning Coordinator Function Registration
and Planning Coordinator Issues

REGULATORY TIMETABLE

Action	Date (2022)
BC Hydro written submissions	Thursday, November 3
Intervener response to BC Hydro written submissions	Thursday, November 17
BC Hydro reply to Intervener submissions	Thursday, December 1
Further process	To be determined