



May 31, 2013

Erica Hamilton  
Commission Secretary  
British Columbia Utilities Commission  
Sixth Floor, 900 Howe Street  
Vancouver, B.C. V6Z 2N3

Dear Sirs and Mesdames:

**Re: British Columbia Utilities Commission (“BCUC”) Order R-72-12 “An Inquiry into the Potential Adjustments for the British Columbia Mandatory Reliability Standards Program” – Final Submission**

After reviewing the BCUC staff Straw Dogs and the various Information Requests and responses, the Clean Energy Association’s view is that the BCUC should when considering

- (a) changes to the BC Rules of Procedure to provide a possible exception process, and
- (b) a process for assessing severity and risk for violations

take into account the average electricity generator and industrial user. Unless there is an essential need to do so, there is no reason why these groups need to be enveloped by the morass of Mandatory Standards. To the extent their participation is essential, then the requirements for this participation should be as clear and transparent as possible. As noted by the Columbia Power Corporation (“CPC”): “Compliance with the MRS Program is a costly and time consuming process”.

These concerns seem to be inherent in the responses of the Association of Major Power Customers of BC (“AMPC”) to the Information Requests made to it by the BCUC. The CEA agrees with these concerns

From the tone of Information Request to the CEA, CPC and AMPC about non-utility participation on TAC it would appear that in some circles the view is that only utilities possess the skill and expertise to provide the necessary advice to the BCUC. To the extent that this bias exists it should be put to rest. To reiterate what the CEA has previously said<sup>1</sup>:

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<sup>1</sup> Exhibit C15-2, page 1



“In addition to the BC Hydro and FortisBC representatives on TAC, there should be at least one representative from each industry that is affected by the Mandatory Reliability Standards Program (“MRS”) e.g. an industrial users representative and a renewable electricity sector representative. As well, perhaps a representative from WECC. Instead of at least one-half of TAC members being employees of entities that are subject to the MRS in B.C., the figure should be two thirds.”

In addition to their technical knowledge non-utility representatives would bring their “cost effective ” knowledge. A technical problem can often have more than one solution one of which may be more cost effective than the other. Cost discipline is not often foremost on the minds of technical representatives from the utility industry.

Yours truly,

“Original signed by David Austin”

David Austin