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## **BY ELECTRONIC FILING**

British Columbia Utilities Commission  
Suite 410, 900 Howe Street  
Vancouver, BC V6Z 2N3

**Attention: Mr. Patrick Wruck,**  
**Commission Secretary and Manager, Regulatory Support**

Dear Sirs/Mesdames:

**Re: British Columbia Hydro and Power Authority**  
**Open Access Transmission Tariff - Dynamic Scheduling Amendments**  
**Application ~ Project No. 1598931**

In accordance with the Regulatory Timetable set for this proceeding by Order G-160-17, we enclose for filing the electronic version of the Final Submission of British Columbia Hydro and Power Authority.

Yours truly,

**FASKEN MARTINEAU DuMOULIN LLP**

*[Original signed by Christopher Bystrom]*

Christopher Bystrom

Encl.

**BRITISH COLUMBIA UTILITIES COMMISSION  
IN THE MATTER OF THE UTILITIES COMMISSION ACT  
R.S.B.C. 1996, CHAPTER 473**

**and**

**BRITISH COLUMBIA HYDRO AND POWER AUTHORITY  
OPEN ACCESS TRANSMISSION TARIFF  
DYNAMIC SCHEDULING AMENDMENTS APPLICATION**

**FINAL SUBMISSION  
OF BRITISH COLUMBIA HYDRO AND POWER AUTHORITY**

**DECEMBER 21, 2017**

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## **PART ONE: INTRODUCTION AND OVERVIEW**

1. In its Application filed October 2, 2017, British Columbia Hydro and Power Authority (“BC Hydro”) applied to amend Attachment Q-1: Dynamic Scheduling of its Open Access Transmission Tariff (the “OATT”). The proposed amendments will allow dynamic scheduling on imports and exports, and on any type of transmission reservation. BC Hydro is also proposing housekeeping amendments to update definitions, correct typographical errors, and to simplify and clarify the language of Attachment Q-1. Clean and blackline versions of BC Hydro’s proposed amendments to Attachment Q-1 are included in Appendix A of the Application. A draft Order is included in Appendix C of the Application.

2. Under Attachment Q-1 of the OATT, BC Hydro currently offers its transmission customers the option of dynamic scheduling on their transmission reservations. Whereas static schedules maintain the same level of electricity over the duration of the schedule, dynamic schedules may vary in real time. Dynamic scheduling under the existing Attachment Q-1 was designed in 2005 to facilitate dynamic scheduling to the California Independent System Operator (“CAISO”). Based on the needs and industry practice at the time, dynamic scheduling under Attachment Q-1 is limited to exports and can only be used on firm point-to-point transmission service (“Firm Service”) reservations. Since 2005, dynamic scheduling has become more prevalent in the western interconnection, and is now used on imports and exports and all types of transmission reservations. Dynamic scheduling is now used in the CAISO’s Energy Imbalance Market (“EIM”), which BC Hydro’s transmission customer and subsidiary, Powerex Inc. (“Powerex”), will be joining on April 4, 2018. BC Hydro is not participating in the EIM, but Powerex’s planned participation in the EIM demonstrates a customer need for BC Hydro to expand the availability of dynamic scheduling under its OATT in line with current industry practice.<sup>1</sup>

3. BC Hydro’s proposed amendments to Attachment Q-1 will provide all of its OATT customers with the option to use their transmission service to schedule dynamically as may be required to take advantage of market opportunities, including the CAISO EIM. The expanded

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<sup>1</sup> Exhibit B-1, Sections 1-3.

availability of dynamic scheduling is consistent with industry practice, and can be implemented safely and reliably and without material impacts on other customers.<sup>2</sup> No comments were received from OATT customers during the consultation period prior to the filing of the Application, and no OATT customers intervened in this proceeding.<sup>3</sup> Aside from Commission proceeding costs, all ongoing operating costs related to service under the OATT are recovered from OATT customers on a forecast cost of service basis.<sup>4</sup> Given the need to implement expanded dynamic scheduling to meet the timelines for Powerex's participation in the EIM, implementation costs in this case will be recovered from Powerex.

4. BC Hydro requests that the Commission find that the proposed amendments to Attachment Q-1 are just and reasonable, and that the Commission approve the amendments as filed. As indicated in the Application, BC Hydro respectfully requests approval of its proposed amendments to Attachment Q-1 on or before January 31, 2018 in order to facilitate Powerex's participation in the CAISO EIM. Powerex intends to commence parallel operations with the CAISO on February 1, 2018. Parallel operations are required to demonstrate that systems and personnel are ready for the April 4, 2018 go-live date for Powerex's full participation in the EIM.

#### **PART TWO: PROPOSED AMENDMENTS TO THE OATT ARE JUST AND REASONABLE**

5. BC Hydro submits that its proposed amendments to Attachment Q-1 are just and reasonable for the following reasons:

- Powerex's planned participation in the CAISO EIM demonstrates a customer need for BC Hydro to expand the use of dynamic scheduling. The proposed amendments are also generally needed to allow all OATT customers to participate in market opportunities that may arise that require dynamic scheduling.

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<sup>2</sup> Exhibit B-1, section 4.

<sup>3</sup> Exhibit B-1, section 6.

<sup>4</sup> Exhibit B-1, section 7; Exhibit B-2, BCUC IR 1.6.3.

- The amendments are aligned with the FERC pro-forma Open Access Transmission Tariff (the “FERC *pro forma* OATT”), as FERC has confirmed that transmission providers under its jurisdiction may offer dynamic scheduling under the FERC *pro forma* OATT.
- The amendments are aligned with industry practice, as other transmission providers in the western interconnection allow dynamic scheduling on all types of transmission reservations and on both imports and exports.
- BC Hydro can safely and reliably offer expanded dynamic scheduling service to its OATT customers on imports and exports using any transmission reservation priority.
- Expanded dynamic scheduling is technically feasible, as demonstrated by the fact that BC Hydro has been offering dynamic scheduling since 2005.
- BC Hydro will continue to offer dynamic scheduling to all OATT customers on a non-discriminatory basis. Accordingly, the proposed amendments are not unduly discriminatory.
- Expanded dynamic scheduling can be provided without material impacts to customers.
- BC Hydro received no comments from OATT customers and other interested parties in response to its posted bulletin describing its proposed OATT amendments and changes to the method for calculating the utilization test.
- As described in section 7 of the Application, implementation costs would be relatively minor and would be recovered from Powerex.

6. Each of the above points is discussed below.

**A. There is a Customer Need for Expanded Dynamic Scheduling**

**(a) Powerex's Participation in CAISO EIM Demonstrates a Need for Expanded Dynamic Scheduling**

7. Powerex's planned participation in the CAISO EIM demonstrates a present customer need for BC Hydro to expand the availability of dynamic scheduling on transmission reservations under the OATT.

8. Powerex will be joining the CAISO EIM on April 4, 2018,<sup>5</sup> and has requested that BC Hydro consider expanding the use of dynamic scheduling to facilitate its participation. The EIM is a new market segment through which Powerex can transact with its customers within the western interconnection.<sup>6</sup> The CAISO EIM was described in the Application as follows:

The CAISO EIM is a voluntary organized market platform for the real time wholesale purchase and sale of imbalance energy. The EIM currently facilitates the efficient dispatch of generation resources within each participating BAA, as well as 15 minute and five minute transfers between participating BAAs. ...Participation in CAISO's EIM five minute market is conducted through dynamic schedules on import and export paths to or from a BAA using a variety of transmission reservation priorities including Firm Service, Non-Firm Service and NITS.

9. Full participation in the CAISO EIM therefore requires expanded use of dynamic scheduling.<sup>7</sup>

10. Although expanding dynamic scheduling will facilitate Powerex's participation in the EIM and ratepayers may benefit from Powerex's participation in the EIM through an increase in trade revenues,<sup>8</sup> BC Hydro is not in a position to forecast revenues from the market opportunities of its transmission customers, including Powerex.<sup>9</sup> As emphasized in its responses to information requests, BC Hydro is not a participant in external wholesale

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<sup>5</sup> Exhibit B-1, p. 1.

<sup>6</sup> Exhibit B-2, BCOAPO IR 1.2.1.

<sup>7</sup> Exhibit B-1, p. 9-10. Exhibit B-2, BCUC IR 1.2.12.

<sup>8</sup> Exhibit B-2, BCOAPO IR 1.2.1 and BCUC IR 1.3.1 and 1.3.1.1.

<sup>9</sup> Exhibit B-2, BCUC IR 1.1.1, 1.3.1 and 1.3.1.1.

electricity markets, and BC Hydro is not applying to participate in or receive EIM services. Rather, BC Hydro is a provider of wholesale transmission services in B.C. pursuant to its OATT.

11. In response to Powerex's request, BC Hydro has concluded that there is no valid reason to continue to restrict dynamic scheduling to exports on Firm Service. The current limited availability of dynamic scheduling in Attachment Q-1 OATT reflects outdated market requirements that are no longer applicable.<sup>10</sup> To meet the needs of OATT customers, the Commission should therefore approve BC Hydro's proposal to expand the availability of dynamic scheduling.

**(b) Expanded Dynamic Scheduling is Needed Even in the Absence of EIM**

12. The expansion of dynamic scheduling would be needed even in the absence of the EIM, as it is required for OATT customers to participate in new and growing markets in the western interconnection. BC Hydro explained in the Application that it has generally adopted new transmission scheduling practices to meet the needs of its customers as industry practice has developed:<sup>11</sup>

BC Hydro's OATT has generally kept pace with market developments as described in sections 2 and 3 of this application, and has been amended in the past to accommodate intra hour scheduling and a limited use of dynamic scheduling. BC Hydro is now proposing amendments to give its OATT customers the option to use their transmission service to participate in markets that require an expanded use of dynamic scheduling. As a transmission provider, BC Hydro has considered the industry developments and concluded that it is reasonable and desirable to propose changes to its OATT to expand the use of dynamic scheduling. It is important that BC Hydro keep up with industry developments where reasonable to support its customers, to reduce seam issues with interconnected BAAs, and to encourage the efficient use of its transmission system.

13. Expanding the availability of dynamic scheduling is expected to increase the options customers have to use their transmission reservations to participate in market

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<sup>10</sup> Exhibit B-1, p. 10.

<sup>11</sup> Exhibit B-1, p.

opportunities.<sup>12</sup> On the other hand, failing to update the OATT in line with market and industry developments could result in BC Hydro's OATT customers not being able to take advantage of market opportunities, which may have negative impacts on the trade revenues of OATT customers. This may in turn reduce transmission customers' willingness to procure BC Hydro transmission service, which would reduce BC Hydro revenues and increase rates for other customers.<sup>13</sup>

14. It is therefore reasonable and beneficial for BC Hydro to keep pace with market developments with respect to dynamic scheduling as proposed in the Application, even in the absence of Powerex's planned participation in the EIM.

**B. Amendments are Aligned with the FERC *pro forma* OATT**

15. The offering of dynamic scheduling is aligned with the FERC *pro forma* OATT, on which BC Hydro's OATT is based.<sup>14</sup> Specifically, in Order No 888-A, issued March 4, 1997, FERC confirmed that transmission providers under its jurisdiction may offer dynamic scheduling under the FERC *pro forma* OATT.<sup>15</sup> Maintaining alignment with the FERC *pro forma* OATT is important, as BC Hydro must maintain comparability with the wholesale transmission service provisions of U.S. based entities under FERC jurisdiction in order to ensure that Powerex maintains its ability to participate in the U.S. markets.<sup>16</sup>

**C. Amendments are Aligned with Industry Practice**

16. The expansion of dynamic scheduling is aligned with industry practice in the western interconnection. Since 2005, when BC Hydro first implemented dynamic scheduling, the industry has developed such that dynamic scheduling is now commonly used on imports and exports, using transmission reservations of different priorities. Other entities in the

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<sup>12</sup> Exhibit B-2, CEC IR 1.4.5.

<sup>13</sup> Exhibit B-2, BCUC IR 1.3.1.

<sup>14</sup> Exhibit B-1, p. 4.

<sup>15</sup> Exhibit B-1, p. 4.

<sup>16</sup> Exhibit B-2, CEC IR 1.1.1.

western interconnection, such as Arizona, Avista, El Paso, PacifiCorp, and Tucson, are allowing dynamic scheduling on non-firm transmission, including network service.<sup>17</sup>

17. As BC Hydro described in section 3 of the Application, the increased use of dynamic scheduling has arisen to assist in integrating variable energy resources (or “VERS”), such as wind and solar generation, and to meet hourly balancing requirements.<sup>18</sup> BC Hydro states:<sup>19</sup>

...in response to the increasing challenge to maintain balancing requirements within the hour, while managing the fluctuations of a growing fleet of intermittent resources, BAAs in the Western Interconnection have also expanded their use of dynamic scheduling in recent years. Dynamic schedules can be managed by the receiving BAA by permitting the BAA to adjust internal generation in order to accommodate dynamic transfers with granularity. By using dynamic scheduling, BAAs can integrate VERs more efficiently and optimize their systems reliably.

18. BC Hydro’s proposal to allow dynamic scheduling on all transmission reservations, on both imports and exports, is therefore aligned with industry practice.

#### **D. Expanded Dynamic Scheduling Can be Offered Safely and Reliably**

19. BC Hydro can offer expanded dynamic scheduling safely and reliably. BC Hydro stated in the Application:<sup>20</sup>

Technology has now developed to the point that the complex coordination between BAAs required for dynamic scheduling is not as challenging as it was at the time of the DS Application in 2005. Because it causes an automatic interchange to occur between BAAs, dynamic scheduling requires coordination between the host BAA, any intermediary BAA(s) and the receiving BAA. Advanced computerized interchange mechanisms are now available to accommodate this coordination. With the benefit of this technology, BC Hydro can safely and reliably offer expanded dynamic scheduling service to its OATT customers on imports and exports using any transmission reservation priority.

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<sup>17</sup> Exhibit B-1, 11-12.

<sup>18</sup> Exhibit B-1, p. 7.

<sup>19</sup> Exhibit B-1, p. 8.

<sup>20</sup> Exhibit B-1, p. 12.

20. Section 2 of the proposed Attachment Q-1 also ensures that BC Hydro has the ability to limit, reduce, or suspend dynamic scheduling if the reliability of the transmission system is threatened.<sup>21</sup>

21. The proposed expanded use of the dynamic scheduling can therefore be offered safely and reliably.

#### **E. Expanded Dynamic Scheduling is Technically Feasible**

22. Dynamic Scheduling is technically feasible as demonstrated by the fact that BC Hydro has been offering dynamic scheduling since 2005.<sup>22</sup> Dynamic scheduling, however, has always been subject to technical limitations and feasibility.<sup>23</sup> BC Hydro's proposed amendments to section 4 of Attachment Q-1 clarify the process required for customers to use dynamic scheduling given these limitations. Specifically, BC Hydro may limit the volume of dynamic scheduling requests that can be accepted based on its reasonable assessment of the availability and limitations of dynamic scheduling between and through specific Balancing Authority Areas ("BAAs").<sup>24</sup> For instance, BC Hydro must have arrangements in place with other BAAs in order to accommodate dynamic scheduling, and dynamic scheduling may be limited by reliability constraints.<sup>25</sup> BC Hydro's proposed amendments to Attachment Q-1 therefore make it clear that BC Hydro is only offering dynamic scheduling to the extent it is technically feasible.

#### **F. Expanded Dynamic Scheduling is Not Unduly Discriminatory**

23. BC Hydro currently offers dynamic scheduling to all OATT customers and its proposed expansion of dynamic scheduling will be similarly offered to all customers on a non-discriminatory basis. As BC Hydro states:<sup>26</sup>

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<sup>21</sup> Exhibit B-1, Appendix A.

<sup>22</sup> Exhibit B-1, pp. 6 and 13. Exhibit B-2, CEC IR 1.5.1.2.

<sup>23</sup> Exhibit B-1, p. 13.

<sup>24</sup> Exhibit B-1, BCUC IR 1.10.1.1.

<sup>25</sup> Exhibit B-1, p. 13.

<sup>26</sup> Exhibit B-1, 11.

Although Powerex is the only BC Hydro OATT customer that has formally expressed to BC Hydro an interest in expanded use of dynamic scheduling at this time, the amendments being proposed would be available to all eligible customers wishing to schedule dynamically. The amendments would be beneficial for all transmission customers who may want to dynamically import and export into or out of other regions and markets.

24. BC Hydro's dynamic scheduling service is therefore not unduly discriminatory.

**G. Dynamic Scheduling can be Implemented without Material Impacts to Customers**

25. Expanded dynamic scheduling can be provided as proposed without material impacts to customers.<sup>27</sup> In responses to information requests, BC Hydro confirmed the following:

- Dynamic scheduling capability does not impact BC Hydro's planning criteria for meeting future load service obligations.<sup>28</sup>
- There is no expected need to make material adjustments with regards to reliability to accommodate the changes to dynamic scheduling.<sup>29</sup>
- BC Hydro's proposals do not alter the principles of open transmission access or the way customers procure transmission service.<sup>30</sup>
- Dynamic scheduling will not change any existing rules for the displacement or curtailment of transmission reservations.<sup>31</sup>
- BC Hydro does not expect a material increase in transmission service sales for F2019 arising from increase dynamic scheduling usage under the OATT, as

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<sup>27</sup> Exhibit B-2, BCUC IR 1.4.4.1.2 and 1.5.1.1, and BCOAPO IR 1.3.3.

<sup>28</sup> Exhibit B-2, BCUC IR 1.2.2.

<sup>29</sup> Exhibit B-2, CEC IR 1.5.3.

<sup>30</sup> Exhibit B-2, BCUC IR 1.4.4.1.2.

<sup>31</sup> Exhibit B-2, BCUC IR 1.4.4.1.

customers can use their existing transmission service reservations for dynamic scheduling.<sup>32</sup>

- While BC Hydro cannot predict any increase in volume in transmission sales, any increase in transmission sales would result in additional OATT revenues.<sup>33</sup>
- BC Hydro is not aware of, and does not foresee, any material issues in how it operates the transmission system in coordination with neighbouring BAAs such as BPA, including for dynamic scheduling purposes.<sup>34</sup>

26. While not part of BC Hydro's proposed amendments to the OATT to expand dynamic scheduling, BC Hydro also does not expect any material impacts from improving the way the utilization rate is calculated pursuant to section 5 of Attachment Q-2 of the OATT.<sup>35</sup> For transparency, BC Hydro included in its Application a description of how it will be improving the method used to calculate the utilization test.<sup>36</sup>

27. No approval is required to adjust the calculation method, as the method is not prescribed in the OATT and the new calculation method will more accurately measure the utilization of transmission reservations as required by Attachment Q-2.<sup>37</sup>

28. BC Hydro's existing method of calculating the utilization test for Network Economy Service pursuant to Attachment Q-2 of the OATT uses the average energy scheduled during an hour, which underestimates actual utilization.<sup>38</sup> Increased use of intra-hour or dynamic scheduling will exacerbate the inaccuracy of the current calculation method, and may therefore impact BC Power Supply's ability to use Network Economy Service for the benefit of

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<sup>32</sup> Exhibit B-2, BCUC IR 1.4.3 and 1.4.3.2.

<sup>33</sup> Exhibit B-2, BCUC IR 1.4.3.1.

<sup>34</sup> Exhibit B-2, BCUC IR 1.5.1.2.

<sup>35</sup> Exhibit B-2, BCUC IR 1.11.1.

<sup>36</sup> Exhibit B-1, Section 5.

<sup>37</sup> Exhibit B-2, BCUC IR 1.11.1.

<sup>38</sup> Exhibit B-2, CEC IR 1.11.1.2.

BC Hydro ratepayers when economically advantageous to do so.<sup>39</sup> BC Hydro's changes to the method of calculating the utilization test will more accurately measure the utilization of transmission reservations for both static and dynamic schedules consistent with the purpose of the utilization test in Attachment Q-2 of the OATT.<sup>40</sup>

29. The utilization test is only used for the purposes of Network Economy Service as set out in Attachment Q-2 of the OATT.<sup>41</sup> As such, OATT customers are the only customers that could be impacted by the utilization test. The fact that OATT customers did not comment on BC Hydro's proposals in the consultation process and did not intervene or submit any comments in this proceeding confirms that BC Hydro's proposed calculation method will not materially impact OATT customers.

#### **H. No Concerns were Expressed by OATT Customers during Consultation**

30. On August 25, 2017, BC Hydro notified its OATT customers and other interested parties of its proposed filing of the Application by way of a bulletin posted on BC Hydro's transmission website. BC Hydro provided for a three-week comment period and requested comments on the need for a face-to-face meeting. BC Hydro received no comments in response to the bulletin.<sup>42</sup> The absence of comments in response to the bulletin and the absence of participation by OATT customers in this proceeding confirms BC Hydro's evidence that no material impacts are expected from BC Hydro's proposal to expand dynamic scheduling.

#### **I. Implementation Costs are Relatively Minor and will be Recovered from Powerex**

31. The costs to implement the proposed amendments to Attachment Q-1 of the OATT are relatively minor and will be recovered from Powerex,<sup>43</sup> except the costs related to the

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<sup>39</sup> Exhibit B-2, BCUC IR 1.5.1.3 and BCUC IR 1.11.1, and CEC IR 1.11.1.2.

<sup>40</sup> Exhibit B-1, p. 22; Exhibit B-2, CEC IR 1.11.1.2.

<sup>41</sup> Exhibit B-2, CEC IR 1.9.1.

<sup>42</sup> Exhibit B-1, p. 25.

<sup>43</sup> Exhibit B-2.

Commission's regulatory process. The key requirements to implement the dynamic scheduling amendments are:<sup>44</sup>

- Posting of the Commission Order approving the amendments and updating the business practices to reflect these amendments to be posted on its Open Access Same Time Information System; and
- Updating BC Hydro's Market Operations and Development System to enable dynamic scheduling on imports and exports using any transmission reservation priority in advance of the February 1, 2018 start of EIM parallel operations.

32. BC Hydro estimates the total cost to implement enhanced dynamic scheduling to be approximately \$300,000.<sup>45</sup> These costs are related to modifications to BC Hydro's Market Operations and Development System.<sup>46</sup> Once the proposed dynamic scheduling amendments are approved and implemented, BC Hydro is not aware of any other incremental costs to BC Hydro to allow its OATT customers to use dynamic scheduling for their business purposes.<sup>47</sup>

33. BC Hydro's normal practice is to recover implementation and operating costs to serve OATT customers through its OATT rates.<sup>48</sup> Due to the expedited timeline required to implement dynamic scheduling to facilitate Powerex's participation in the EIM, however, the implementation costs will be recovered from Powerex.<sup>49</sup> The only incremental costs related the proposed OATT amendments that will not be recovered from Powerex or OATT customers generally are costs related to the Commission process, such as participant funding,<sup>50</sup> which is consistent with past practice.

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<sup>44</sup> Exhibit B-1, p. 26.

<sup>45</sup> Exhibit B-1, p. 26.

<sup>46</sup> Exhibit B-2.

<sup>47</sup> Exhibit B-2, BCUC IR 1.6.10.

<sup>48</sup> Exhibit B-2, BCUC IR 1.6.10.

<sup>49</sup> Exhibit B-2.

<sup>50</sup> Exhibit B-2, BCUC IR 1.6.3.

**PART THREE: CONCLUSION AND ORDER SOUGHT**

34. The evidence demonstrates that BC Hydro's proposed amendments to Attachment Q-1 are just and reasonable. The amendments are consistent with the FERC *pro forma* OATT and industry practice, and can be implemented safely, reliability and with relatively minor cost to BC Hydro. The expanded use of dynamic scheduling will allow all OATT customers to use their existing transmission reservations for business opportunities that may arise, and will specifically enable Powerex to participate in the CAISO EIM. BC Hydro does not foresee any material impacts on customers as a result of expanded dynamic scheduling. Consistent with this view, no OATT customers commented on BC Hydro's consultation bulletin or intervened in this proceeding. BC Hydro submits that its proposed amendments to Attachment Q-1 of the OATT should be approved as filed, on or before January 31, 2018, in order to facilitate Powerex's participation in the CAISO EIM.

ALL OF WHICH IS RESPECTFULLY SUBMITTED

**FASKEN MARTINEAU DUMOULIN LLP**  
**Counsel for British Columbia Hydro and Power Authority**

*Original signed by C.R. Bystrom*

Per: \_\_\_\_\_  
Christopher R. Bystrom