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December 11, 2012

**BCUC INQUIRY INTO THE  
BC MRS PROGRAM**

**EXHIBIT A-6**

Mr. R. Brian Wallace, Q.C.  
Bull, Housser & Tupper LLP  
3000 Royal Centre  
1055 West Georgia Street  
Vancouver, BC V6E 3R3

Dear Mr. Wallace:

Re: Inquiry into Potential Adjustments for the  
British Columbia Mandatory Reliability Standards (MRS) Program (Inquiry), Order R-72-12  
Association of Major Power Customers of BC (AMPC) Request for BCUC Forbearance

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The BC Utilities Commission (Commission) acknowledges receipt of your November 28, 2012 letter (Exhibit C14-2), requesting the Commission to take immediate steps to forebear from enforcing existing BC MRS reporting and audit functions, direct BC Hydro and FortisBC to negotiate assignment agreements with further steps if negotiations are not "successful", and consider the effectiveness of the procedure to assign BC MRS compliance responsibility.

The Commission has also reviewed the related letter of comment submitted by BC Hydro on December 7, 2012 (Exhibit C17-2).

Notwithstanding the assertions in your letter regarding a variety of points alleged to have been "established" at the Commission's Information Workshop on November 21, 2012, these are AMPC perspectives to which the Commission and others may not agree. No response is made regarding such matters, as the relative merits of those positions are outside the MRS Inquiry scope. The Commission reminds AMPC of the focused scope and timetable of the MRS Inquiry and advises that it is not considering any changes to either as a result of your letter.

A major focus of the Inquiry is the development of a BC-specific exception process so that potential exceptions can be considered if a new Bulk Electricity System (BES) definition is established for BC. Until a new BES definition and associated exception processes are established in BC, it is a matter of speculation as to whether, or to what extent, large industrial customers or other entities would no longer be subject to MRS Program requirements.

The Commission encourages AMPC's contributions to tailoring the potential exception process to BC's unique characteristics by way of comments for the forthcoming "strawdog" drafts in the Inquiry process. A transition phase may be provided for in the "strawdog" drafts and comments will be welcomed in that context. In the meantime, the Commission will continue to act with due regard for the existing legislated MRS Program in not considering preemptive changes or prejudging the result of the Inquiry.

Finally, the Commission notes that assignments are not mandated in the MRS Program's legislative and regulatory framework. Assignments may be considered on a voluntary basis between entities and do not proceed at the Commission's direction.

Yours truly,

Erica Hamilton

MRT/tk

cc: BC MRS Inquiry Registered Interveners and Interested Parties