



January 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”

The Clean Energy Association of B.C. (“CEA”) has reviewed the BCUC Staff’s “Straw Dog #1”, Exhibit A-7 . At this time it has no comments on Part A which is an outline of the proposed transition process from the bulk power system definition to the new Bulk Electric System Definition.

With respect to Part B which is the proposed B.C. Specific Exception Process, there is a need for clarity, or at least some indication/direction, as to what BCUC would accept as technical justification for an exclusion exception (full or partial) to be granted.

At this time the CEA has no comments on Straw Dog #2, Exhibit A-8.

With respect to Straw Dog #3, Exhibit A-9, the CEA notes the Technical Advisory Committee (“TAC”) will be playing an influential role in the processes e.g. recommending technical criteria suitable for consideration of the technical justification for Exception Requests. It is important that the composition of the TAC is appropriately representative.

In addition to the BC Hydro and FortisBC representatives on TAC, there should always 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.

A written record of all TAC proceedings should be maintained including any reports made by the TAC Chair.

For the purpose of its final submission the CEA may have additional comments on the MRS matters that the BCUC is reviewing.



Yours truly,

“Original signed by David Austin”

David Austin