

British Columbia Utilities Commission (“BCUC”) An Inquiry into potential adjustments to the British Columbia Mandatory Reliability Standards (BC MRS) Program – Project No. 3698595/R-72-12	Submission Date: April 26, 2013
Clean Energy Association of B.C. (“CEBC”) Response to BC Hydro Information Request (IR) No. 1 to CEBC	Page 1 of 2

1.0 Reference: Exhibit 15-2 at page 1

“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.”

- 1.1 Is the CEA aware of any other jurisdiction that has a “Partial Exclusion Exception”?

Response:

The CEBC is not familiar with the regulatory practise in other jurisdictions with respect to “Partial Exclusion Exception”.

2.0 Reference: Exhibit 15-2 at page 1

“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....”

Reference: BCUC Straw Dog #1, Exhibit A-7, page 8

“Technical Advisory Committee” or “TAC” means the group of technical experts in BC operating as directed by the Commission to provide to the Commission BC-specific technical information on Bulk Electric System configurations and operations in BC.”

- 2.1 Please confirm that the goal of the TAC is to provide B.C.-specific technical information on Bulk Electric System configurations and operations in B.C.
- 2.2 Please confirm that a priority for membership on the TAC is technical expertise.

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Response:

While technical expertise is required, it doesn’t reside exclusively in the utility sector, and the CEBC doesn’t want this sector to be the exclusive provider of this expertise.

In addition, a technical problem can have different technical solutions one of which may be less expensive than the others. The utility sector can often pass through the costs of technical solutions to its customers. The individuals who provide technical expertise to this sector are not necessarily attuned to the cost implications of their advice. In the independent power sector, there is no ability to pass through the cost of technical solutions to customers and the technical experts are highly attuned to the cost implications of their advice. Attention to the cost of technical solutions is just as important as the technical solution and the cost expertise must be present on TAC.