

May 30, 2016

VIA EMAIL

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Ms. Laurel Ross  
Acting Commission Secretary  
BC Utilities Commission,  
Suite 600, 900 Howe Street,  
Vancouver, BC V6Z 2N3  
Commission.Secretary@bcuc.com

Dear Ms. Ross,

**RE: British Columbia Mandatory Standards Program  
Revisions to the Registration Manual  
Rules of Procedure for Reliability Standards in BC, Appendix 1  
Request for Comments**

Catalyst Paper Corporation (Catalyst) submits the following comments in response to the Commission's request for comments letter dated August 16, 2016 regarding the referenced issue.

Issue 1: Section 2.1.2

"The Commission recognizes two principles as key to the Entity selection process. These are:

1. There needs to be consistency within North America with respect to which Entities are registered; and
2. Any Entity reasonably deemed material to the reliability of the BES will be registered, irrespective of other considerations.

To address the second principle, the Commission will, with the help of the Administrator, identify and register any Entity the Commission deems material to the reliability of the BES."

Catalyst continues to recommend the formation of a provincial technical committee, comprised of representatives from Registered Entities, whose role would be to determine the materiality of reliability effects to the BES in the BC electrical system.

Issue 2: Section 2.1.2(a.2)

A customer that owns, controls, or operates Facilities that are part of another Registered Entity's UVLS, Special Protection System, Remedial Action Scheme or transmission protection system should not be required to be a Registered Entity. Rather the customer's

obligations should be limited to providing the owner (the Registered Entity) of the UVLS, Special Protection System, Remedial Action Scheme or transmission protection system that information which the Registered Entity requires to demonstrate compliance with Mandatory Reliability Standards (MRS). If the customer fails to provide the Registered Entity with the required information, the Registered Entity may then apply to the Commission for a specific order to compel the customer to provide the required information.

Such a process as described above would significantly reduce the administration associated with BC's MRS Program, and still retain the system reliability benefits associated with MRS compliance. An additional benefit is that the Registered Entity that owns the UVLS, Special Protection System, Remedial Action Scheme or transmission protection system, would now have responsibility and visibility of the complete system, which it does not have under the current processes.

Issue 3: Section 2.1.2

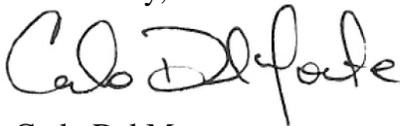
The proposed changes to the registration manual apparently eliminate the Planning Authority functional Entity (for which BC Hydro is the Registered Entity in BC), and retain the Planning Coordinator functional Entity, for which no entity currently registered as in BC. Please provide additional information for the role of the proposed Planning Coordinator, and the relationship with other Registered Entities in BC.

Issue 4: Section 3

As the registration manual is being revised, this would be an appropriate time to review the assignment of compliance responsibility, particularly as it applies to the function of a Transmission Operator (TOP) that is also a utility customer. In situations where personnel belonging to a utility customer (which is also a TOP Registered Entity) are prohibited from operating BES elements without the approval from their utility (a TOP Registered Entity as well as the Balancing authority), the utility customer should cease to become a TOP Registered Entity, because the utility personnel are responsible for reliability of the BES. Any responsibilities that the utility customer or its personnel are required to perform will be dealt with as suggested in issue 2.

Thank you for the opportunity to submit these comments.

Yours truly,



Carlo Dal Monte  
Director, Energy  
Catalyst Paper Corporation