



August 28, 2020

Sent via email/eFile

KPL – SAFETY AND RELIABILITY INVESTIGATION
EXHIBIT A-7

Tanya L. DeAngelis LL.B
Chairperson & Director, Corporate Secretary
Synex International Inc.
tdeangelis@synex.com

Re: Kyuquot Power Ltd. – Investigation into the Safety and Reliability of the KPL System – Project No. 1599094 – BCUC Information Request No. 2 to KPL

Dear Ms. DeAngelis,

Further to the above-noted matter, enclosed please see British Columbia Utilities Commission Information Request No. 2. Please file your responses by Friday, September 25, 2020.

Sincerely,

Original signed by Ange-Christelle Irakarama for:

Marija Tresoglavic
Acting Commission Secretary

/jo
Enclosure



Kyuquot Power Ltd.
Investigation into the Safety and Reliability of the KPL System

INFORMATION REQUEST NO. 2 TO KYUQUOT POWER LTD.

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A. BCUC ORDER G-50-20

11.0 Reference: **BCUC ORDER G-50-20**
BCUC Order G-50-20; Exhibit A2-6, pp. 8-9, Exhibit D-3, IR 1.2.1, 1.3, 1.4, 1.4.1, 1.6, 1.7
BCUC Order G-50-20 Directives

In response to British Columbia Utilities Commission (BCUC) Information Request (IR) 1.2.1 regarding an estimate as to when Kyuquot Power Ltd. (KPL) expects British Columbia Hydro and Power Authority's (BC Hydro) review of its primary service alteration application to be complete, KPL stated that "BC Hydro has not provided an estimate of time."

11.1 Please discuss the risks to the KPL power distribution system (KPL System) should BC Hydro's review of KPL's primary service alteration application and any resulting work not be completed prior to Winter 2020/2021. Please include in the discussion KPL's forecast peak load for Winter 2020/2021 relative to the fuse capacity at the BC Hydro Point of Interconnection (POI).

11.1.1 Please discuss how KPL will mitigate these risks, if any.

In response to BCUC IR 1.3, KPL stated:

With regard to the recommended vegetation management, the KCFN have requested that non-residents not travel to Kyuquot due to COVID-19 concerns and KPL contractors and personnel have complied with this request. Therefore, KPL has not completed any vegetation management to date in calendar 2020. In addition, due to summer weather conditions, KPL will review and enact vegetation management activities in the fall of 2020. Vegetation management activities have been customarily completed by KCFN members during the fall season for technical and weather reasons.

KPL's response to Directive 5 of BCUC Order G-50-20 is included as Exhibit A2-6. Exhibit A2-6 includes a report titled "Kyuquot Power Ltd. System Stabilization Plan," which is authored by TE Burns Engineering

and dated March 30, 2020 (TE Burns Engineering Stabilization Plan).

- 11.2 Please discuss whether the requested travel limitation for Kyuquot due to COVID-19 will have any impact on completion of any vegetation management activities given these activities have been customarily completed by Ka:yu:k't'h'/Che:k'tles7et'h' First Nations (KCFN) members, as noted in the preamble.
 - 11.2.1 Please discuss whether, in KPL's view, KPL contractors could complete the identified vegetation management activities in a manner that would mitigate the risk of COVID-19 transmission to the KCFN community.
- 11.3 Please discuss whether KPL considers the vegetation management identified by the TE Burns Engineering Stabilization plan "to ensure stability for the 3-month period stipulated in BCUC Order G-50-20" as a critical maintenance activity.
- 11.4 Please discuss what reviews were undertaken by KPL to determine that it was safe and prudent to defer the vegetation management activities identified in the TE Burns Engineering Stabilization Plan. Please identify the qualifications of the individuals completing the review.
- 11.5 Please discuss what oversight KPL provides to KCFN vegetation management contractors to ensure that vegetation management is completed in accordance with any applicable standards or work instructions and in a manner consistent with WorkSafeBC Regulations.

Further in response to BCUC IR 1.3, KPL stated:

After initial vegetation assessment, if appropriate, KPL will consider utilizing an arborist to help in critical areas. The vegetation management plans of KPL has been successful and appropriate over the past 14 years as evidenced by the limited number and consistency of outages. Vegetation management activities include annually reviewing, identifying and clearing of approximately 10km portions of the powerline.

- 11.6 Please explain under what conditions KPL elects to use Certified Utility Arborists for vegetation management activities.

Page 5 of the TE Burns Engineering Stabilization Plan states:

There are several locations where there is damaged line hardware such as insulators, insulator brackets, neutral spools and some places where the neutral conductor has been dislodged from its spool. The line requires a detailed pole by pole inspection by qualified personnel to report all the locations where damage has occurred. This should be followed by a full maintenance cycle to repair deficiencies. (See Attachment #2: Examples of Clearance & Vegetation Issues and Damage on KPL System).

Pages 8 to 9 of the TE Burns Engineering Stabilization Plan states:

To ensure stability for the 3-month period stipulated in BCUC Order G-50-20 any previously identified locations where there is hardware or structure damage should be repaired as soon as crews and parts are available on a priority basis.

In addition, qualified utility powerline technician should be engaged to patrol of the entire KPL system to identify any other high-risk damage.

In response to BCUC IR 1.4, which asked whether the recommended repair work has been completed on the KPL System, KPL stated:

The repair work included in the submissions of KCFN and the TE Burns Report that were agreed by Technical Services BC (“TSBC”) has been completed.

In response to IR 1.5, KPL stated:

The TSBC has customarily provided annual inspections, often with KPL contractors in attendance. A TSBC inspection has not yet been scheduled for 2020. KPL has not yet completed a patrol of the entire KPL System in 2020 to identify, if any, high-risk damage. KPL needs to address the unauthorized control by the KCFN of the GOLB.

At this time, KPL is adhering to a request from KCFN for non-residents to avoid travel to Kyuquot due to COVID 19 as well as an additional KCFN request for KPL contractors to remain outside KCFN boundaries.

- 11.7 Please confirm, or otherwise explain, whether the reference above to “Technical Services BC” is intended to refer to Technical Safety BC (TSBC).
- 11.8 Please confirm whether all of the previously identified locations where hardware or structure damage has been identified have been repaired, included those identified in the TE Burns Engineering Stabilization Plan in Attachment #2: Examples of Clearance & Vegetation Issues and Damage on KPL System.
 - 11.8.1 If not confirmed, please explain why not and when KPL expects to complete this work.
- 11.9 Please discuss what reviews were undertaken by KPL to determine that it was safe and prudent to defer the patrol of the entire KPL System and any other deferred maintenance activities identified in the TE Burns Engineering Stabilization Plan. Please identify the qualifications of the individuals completing the review.
- 11.10 Please explain when KPL intends to complete a patrol of the entire KPL System if the request to avoid travel to Kyuquot is not lifted before Winter 2020/2021.

In response to BCUC IR 1.6, KPL stated:

In the past, there was a working group including KPL which met annually by conference call regarding funding and maintenance of the road between Houpsitas and Chamiss Bay.

- 11.11 Please confirm who was part of this working group and when its last annual meeting took place.

In response to BCUC IR 1.7, KPL stated:

With regard to some of the recommended actions in the TE Burns Report, the KCFN, within Exhibit 2-11, has indicated that such actions would be part of the due diligence KCFN would need to undertake in order to purchase the KPL System. They fall outside the parameters of a full condition assessment report.

- 11.12 Please provide the page number for the reference noted as “exhibit 2-11.”
- 11.13 Please identify which recommended actions from the TE Burns Engineering Stabilization Plan KPL considers will fall outside the parameters of a full condition assessment report, and for each item please explain why KPL believes it is prudent not to complete the work at this time.
- 11.14 Please provide a summary of any and all discussions regarding the potential sale of KPL.

B. KPL SYSTEM CONFIGURATION

- 12.0 Reference:** KYUQUOT POWER LTD. SYSTEM STABILIZATION PLAN
Exhibit D-3, IR 2.3
Customer Configuration

In response to BCUC IR 2.3, KPL stated:

The power poles of KPL and KCFN that have joint use are the subject of an agreement between KPL and KCFN under which each party is responsible for its portion of maintenance, replacement and other activities. The portions of each structure that provides either KPL service or KCFN service is under sole control and cost of KPL or KCFN, respectively. As noted in KPL's response to BCUC IR 1.3, it is likely that unauthorized control of the GOLB by the KCFN continues but KPL is not able to conduct a physical inspection because of KCFN's request to avoid travel to Kyuquot due to COVID 19 as well as a KCFN request to remain outside KCFN boundaries.

- 12.1 On the KPL record drawings provided in Exhibit A2-3, please indicate:
- i. Where the KCFN Point of Interconnection is located;
 - ii. Which structures are KCFN and KPL shared structures;
 - iii. The location of the GOLB switch referred to in the above preamble;
 - iv. The location of KCFN boundaries; and
 - v. Which KPL structures are located within KCFN Boundaries.
- 12.2 For any shared structure marked in response to BCUC IR 12.1 (ii) above, please confirm:
- i. who built these jointly used power structures;
 - ii. who owns, or what the ownership structure is, for the jointly used power structures; and
 - iii. who is responsible for maintenance of the structures and equipment.
- 12.3 For any structures identified above in IR 12.1 (v), please identify if there are any right of way or land use agreements in place, which would allow KPL to access and work on these structures.
- 12.3.1 Please provide a copy of these agreements.
- 12.4 Please describe any and all right of way (ROW) or land use agreements that are in place for all aspects of the KPL System.
- 12.4.1 Please provide a copy of these agreements.
- 12.5 Please provide a copy of the agreement between KPL and KCFN for the jointly used power poles.
- 12.6 Please discuss whether, in KPL's view, KCFN has the right to restrict KPL's access to the KPL System for any reason, including but not limited to, safety concerns or critical maintenance activities.

C. LOAD MANAGEMENT AND POWER SYSTEM STUDIES

- 13.0 Reference:** KYUQUOT POWER LTD. SYSTEM STABILIZATION PLAN
Exhibit D-3, IR 3.6, 3.10; Exhibit D-4, IR1
Load Management and Power System Studies

In response to BCUC IR 3.6, KPL stated:

Energy sales (kWh) to KPL customers have averaged an annual growth rate of about 2% over the past 5 years.

- 13.1 Please provide the underlying calculations used to determine the above statement.

In response to KCFN IR 1, KPL stated:

The KPL Field Service Representatives (“FSR’s) communicate with BC Hydro technical staff regarding fusing, particularly during times of outage, and accordingly, the size of a fuse selected by the FSR is dependent on past and present understandings and communications with BC Hydro personnel.

In response to BCUC IR 3.10, KPL stated:

A fusing co-ordination study was completed in 2006. The study was completed by Elite Engineering Ltd. and related to a maximum fuse size of 40T at the point of interconnection with BC Hydro.

- 13.2 Please explain, in KPL’s view, how often or in what conditions an engineering review of the protection and coordination of the KPL System should be completed.
- 13.3 Please explain, in KPL’s view, how often or in what conditions a short circuit study of the KPL System should be completed.
- 13.4 The above preamble refers to KPL’s Field Service Representatives (FSR’s). Please confirm whether this is internal KPL terminology or whether this refers to a Field Safety Representative as certified by TSBC.

D. POWER LINE SAFETY & MAINTENANCE

- 14.0 Reference: **POWER LINE SAFETY & MAINTENANCE**
Exhibit D-3, IR 5.1, 5.1.1
Maintenance Programs

In response to BCUC IR 5.1 (b), KPL stated:

Maintenance inspections are presented to KPL managing personnel, often verbally, and remedial action plan is co-ordinated with other activities, if appropriate.

In response to BCUC IR 5.1.1, when asked to provide all maintenance inspection reports for KPL’s System from 2018-2020, KPL stated that “The maintenance inspection reports for KPL’s System from 2018-2020 are included in Confidential Appendix I.”

- 14.1 Please confirm, or explain otherwise, that KPL does not have any records of maintenance inspection reports aside from those provided in Confidential Appendix I.
- 14.2 Please provide details and documentation of any line inspections performed by KPL or KPL Contractors from 2018-2020.
- 14.3 Please confirm, or explain otherwise, whether KPL keeps a central written record of planned or completed maintenance activities on its distribution System.
- 14.3.1 If confirmed, please provide copies of all relevant documentation.
- 14.3.2 If not, please explain why not.
- 14.4 Please discuss whether KPL has any programs in place for regular periodic testing or regular

preventative maintenance on its poles, transformers, or other assets.

- 14.4.1 If yes, please provide copies of the maintenance plans and copies of the maintenance reports.
- 14.4.2 If no, please explain why not. In your response, please explain the risks to the KPL System of not having a formal maintenance program for poles, transformers, or other assets.
- 14.5 Please discuss whether KPL has an “Owners Engineer” who is responsible for reviewing recommendations of KPL’s line contractors and/or TSBC and overseeing any changes made to the KPL System.
 - 14.5.1 If not, please explain why not and whether KPL has considered procuring engineering resources.
- 14.6 Please discuss under what circumstances KPL or a third-party contractor complete field inspections of line contractors’ work on the KPL System to ensure that work has been completed to applicable standards or codes.

E. LETTER OF COMMENT

**15.0 Reference: Exhibit E-5
Letter of Comment from School District 84**

In the letter of comment provided by School District 84 in Exhibit E-5, Deane Johnson writes:

Our school and teacherages were without power for all of or part of 26 days between November and April. ... During this time, we were billed fully for power on those days. The meters were removed by HB Energy in august and are still not replaced. We were billed at 10,000 KWh/month (Based on Winter usage from previous years).

- 15.1 Please provide a current copy of KPL’s Electric Tariff.
- 15.2 Please confirm, or otherwise explain, that all KPL customers are metered and served according to KPL’s Electric Tariff.
- 15.3 Please confirm, or explain otherwise, that School District 84 is a customer of KPL.
- 15.4 Please explain what circumstances led to the School District 84 meter being removed.
- 15.5 Please explain whether or not the meter is still removed and when it will be re-installed.
- 15.6 Please explain whether any other customer meters have been removed and not replaced.
- 15.7 Please explain how the School District would be charged for power on days when it consumed no power due to a power outage.
- 15.8 Please explain how billing errors, if any, will be corrected.
- 15.9 Please explain whether KPL has ever received any complaints from School District 84. If yes, please provide details of the complaints.

F. KPL CORPORATE STRUCTURE

- 16.0 Reference:** **KYUQUOT POWER LTD. CORPORATE STRUCTURE**
Exhibit D-3, BCUC IR 1.7.1.1
Company Organization Chart

In response to BCUC IR 1.7.1.1, KPL stated:

The party responsible for the full condition assessment for the RRA would be Greg Sunell, who currently provides operation and management services to KPL.

- 16.1 Please provide a current corporate organization chart for KPL, showing positions and descriptions of all employees, management, and directors.
- 16.1.1 Please indicate Greg Sunell on the corporate organization chart, including his position title.