

Joanna Sofield

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August 27, 2010

Ms. Erica M. Hamilton
Commission Secretary
British Columbia Utilities Commission
Sixth Floor – 900 Howe Street
Vancouver, BC V6Z 2N3

Dear Ms. Hamilton:

**RE: Project No. 3698593
British Columbia Utilities Commission (BCUC)
British Columbia Hydro and Power Authority (BC Hydro)
Mandatory Reliability Standards Assessment Report No. 2**

BC Hydro writes to comment on the impact that directives 4 and 5 of the Draft Order for the above-mentioned proceeding may have on the registration requirements for entities in British Columbia (**B.C.**), as requested by the BCUC in its letter dated August 4, 2010.

Directives 4 and 5 of the Draft Order propose that the BCUC adopt the North American Electric Reliability Corporation (**NERC**) Glossary of Terms Used in Reliability Standards (**Glossary of Terms**), dated April 20, 2009, and version 4 of the NERC Functional Model, respectively.

In accordance with section 3.1.1 of the Registration Manual, approved as part of the Rules of Procedure pursuant to BCUC Order No. G-123-09, Applicable Entities responsible for the functions of one or more of the Responsible Entities listed below are required to register through the BCUC registration process.

Responsible Entities

Transmission Operator	Resource Planner
Balancing Authority	Distribution Provider
Planning Authority	Generation Owner
Transmission Planner	Generation Operator
Transmission Service Provider	Load-Serving Entity
Transmission Owner	Purchasing-Selling Entity

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Section 3.1.1 of the Registration Manual also specifies that the Responsible Entities are as defined in the most recently adopted Glossary of Terms. The definitions of the Responsible Entities listed above will not change as a result of adopting the April 20, 2009 version of the Glossary of Terms. Further, as specified in the introduction to the NERC Functional Model, it is a guideline and not a requirement.

Consequently, it is BC Hydro's view that directives 4 and 5 of the Draft Order for this proceeding will have no impact on the registration requirements for Entities in B.C.

For further information, please contact the Mark Thompson at 604-623-4233.

Yours sincerely,



Joanna Sofield
Chief Regulatory Officer

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- c. BCUC Project No. 3698593 (MRS Assessment Report No. 2) Registered Intervener Distribution List.