



Name :	Email:
Phone number :	Entity (Company name) :

This form is used to respond to questions regarding the 2022 annual statutory update of the Register of Entities Subject to Reliability Standards (the “Register”). Please complete this form and email it to fiabilite@hydro.qc.ca **no later than February 27, 2023**.

For any questions or additional information, please write to fiabilite@hydro.qc.ca.

Context

In compliance with Section 85.13 of the Act Respecting the Régie de l’énergie (hereinafter the “Law”), the Reliability Coordinator in Québec (hereinafter the “Coordinator”) submits to the Régie de l’énergie (hereinafter the “Régie”) for approval, the Register of Entities subject to Reliability Standard (hereinafter the “Register”). The purpose of this document is to reflect additions and modifications to the information on the facilities of Registered Entities since the last annual filing under filing R-4179-2021. The changes proposed by the Coordinator reflect the development of the Transmission System between October 2, 2021, and October 1, 2022.

The Coordinator deems it appropriate to proceed with a public consultation in order to validate the proposed modifications with the concerned Registered Entities in a public and transparent manner. This approach also allows concerned Registered Entities to identify other changes that may be required to the Register, such as a change to the legal name of an entity or the transfer of a facility from one entity to another.

Appendix A – Entities

Question 1		
<p>The Coordinator is evaluating the removal of the column on facilities/equipment required for System restoration. As a result, the Register would no longer identify Registered Entities with facilities/equipment required for System restoration. Do you agree with this removal? Please justify your answer.</p> <p>The EOP-005 and EOP-006 standards cover the processes of system restoration, through these standards, the Transmission Operator (TOP) must identify the Blackstart Resources of the TOP's System. However, the various communication procedures between the TOP, the RC and the Registered Entities included in the system restoration plan are in the standards.</p> <p>the Coordinator believes that the information on System restoration should be removed from the Register, since it is part of the application of Reliability Standards. The Coordinator also points out that the removal of this information should be done in a Register update filing rather than in a standard modification filing since the removal has no impact on compliance nor application of standards EOP-005 or EOP-006.</p>		
Answer 1	Yes	No
Do you agree with the proposed removal?		
Justification :		

Appendix A – Entities (next)

Question 2		
<p>The Coordinator is evaluating the removal of the column on the underfrequency load shedding program. Do you agree with this removal? Please justify your answer.</p> <p>Per its Decision D-2015-059, par. 779², the Régie requested that the Coordinator add the identification of Registered Entities that owns or operates an underfrequency load shedding program (hereinafter, the "UFLS program") to the Register. This request was initially made in response to the application of Reliability Standards PRC-007, PRC-008 and PRC-009. However, these standards were never in effect in Québec and therefore the information in the Register never fulfilled its original purpose. As of February 2023, PRC-006-5 and PRC-006-NPCC-2 are the two (2) effective Reliability Standards in Québec for design and documentation of UFLS programs.</p> <p>The Coordinator believes that maintaining this information in the Register may lead to confusion and misapplication of the relevant Reliability Standards. Indeed, it has been brought to the attention of the Coordinator that Generator Owners (GOs) may believe that they are not covered by PRC-006-NPCC-2, particularly since the column in the Register "Underfrequency load shedding program (DSF) (Own/Operates)" indicates, "No" for all GOs except Hydro-Québec.</p>		
Answer 2	Yes	No
Do you agree with the proposed removal?		
Justification :		

² Régie de l'énergie, Decision D-2015-059, par. 779, retrieved February 3, 2023, from <http://www.regie-energie.qc.ca/audiences/decisions/D-2015-059.pdf#page=187> (in French only)

Appendix A – Entities (next)

Question 3

The Coordinator is evaluating the removal of the column on the Undervoltage Load Shedding Program (UVLS) from the Register. **Do you agree with this removal? Please justify your answer.**

For the "Undervoltage Load Shedding Program (DST) (Owns/Operates)" column in Appendix A of the Register, the Coordinator notes that this column does not add any value to the application of Reliability Standards or to the Register. In fact, the column is marked "No" for all Registered Entities.

The UVLS program column was listed in the Register as a result of Régie's decision D-2015-059, par. 776. This listing was in response to identification needs for the application of Reliability Standards PRC-010, PRC-011, PRC-021 and PRC-022. However, to date, only standard PRC-010 is still effective in Québec and there is currently no Registered Entity that owns or operates a UVLS program in Québec.

Answer 3

Yes

No

Do you agree with the proposed removal?

Justification :

Effective date for facilities whose registration is modified

Question 4

Following paragraph 53 of decision D-2022-146³, the Coordinator submits to the Régie a proposal regarding the effective date for facilities whose registration in the Register is modified.

The Coordinator proposes that there be no delay between the inclusion of facility modifications in the RTP and their commissioning.

As early as the evaluation phase of a project, a Registered Entity should determine whether its facility is included in the RTP. The Coordinator has a monitoring role at all times and can always assist an entity in becoming subject to the RTP. A Registered Entity should not use the Register as an excuse to avoid or delay compliance with Reliability Standards, particularly from a public interest perspective.

Example : a substation with an initial voltage level of 315 kV included in the RTP has a voltage level of 735 kV added as a result of a project by the Registered Entity. Inclusion in the RTP of the modification to the facility must be upon the commissioning of the modification. The entity must be able to assess that the modification will be included in the RTP as early as the project evaluation phase. The change in the Register will be listed only after the change is effective.

Answer 4

Yes

No

Do you agree with the proposal for an effective date of no delay for facilities whose registration in the Register is modified?

Justification :

³ Régie de l'énergie, decision D-2022-146, par. 53, retrieved February 3, 2023, from http://publicsde.regie-energie.qc.ca/projets/608/DocPrj/R-4179-2021-A-0025-Dec-Dec-2022_12_06.pdf#page=17 (in French only)

General

Question 5

Do you have any additional comments on the Register's 2022 annual statutory update? If so, please comment.

Example of comment :

- Entity XYZ, the value of the installed capacity of the facility XY should be 100 MVA rather than 90 MW.

Answer 5

Yes

No

Comments :