

---

## Project QC-2021-09

### Statutory update of the Register of Entities subject to Reliability Standards

---

System as of October 1, 2021

#### 1. INTRODUCTION

Pursuant to Decision D-2018-149,<sup>1</sup> the Reliability Coordinator for Québec (hereinafter the “Coordinator”) set December 1 of every calendar year as the date of the statutory update of the Register of Entities subject to Reliability Standards (hereinafter the “Register”).

The purpose of this document is to account for changes or additions to the information on facilities and entities subject to Reliability Standards since the first statutory filing under Docket R-4154-2021. The changes proposed by the Coordinator reflect the development of the transmission system between February 1, 2021, and October 1, 2021.

The Coordinator has chosen to hold a public consultation to validate the proposed changes together with impacted entities in a public and transparent manner. This approach will also give impacted entities the opportunity to identify any other changes to the Register that may be required, such as a change to the legal name of an entity or the transfer of a facility from one entity to another.

#### 2. SUMMARY OF REQUESTS ISSUED BY THE RÉGIE

The purpose of this section is to draw up an inventory of the requests of the Régie de l’énergie (hereinafter the “Régie”) regarding the form and content of the present statutory Register filing following Decision D-2021-110<sup>2</sup> arising from the previous statutory update (Docket R-4154-2021).

Request No.	Provision	Description
1	28	Submit a proposal to set the end date of the transmission system development period to be covered by future statutory Register updates.
2	41	Submit a proposal regarding the effective date for facilities whose registration has been changed in the Register.

---

<sup>1</sup> Régie de l’énergie, Decision D-2018-149, retrieved March 5, 2021, from [http://publicsde.regie-energie.qc.ca/projets/346/DocPrj/R-3952-2015-A-0062-Dec-Dec-2018\\_10\\_23.pdf](http://publicsde.regie-energie.qc.ca/projets/346/DocPrj/R-3952-2015-A-0062-Dec-Dec-2018_10_23.pdf) (in French only)

<sup>2</sup> Régie de l’énergie, Decision D-2021-110, retrieved October 21, 2021, from [http://publicsde.regie-energie.qc.ca/projets/580/DocPrj/R-4154-2021-A-0011-Dec-Dec-2021\\_08\\_27.pdf](http://publicsde.regie-energie.qc.ca/projets/580/DocPrj/R-4154-2021-A-0011-Dec-Dec-2021_08_27.pdf) (in French only)

3	109	Submit a proposal to ensure that references, in the Register and to terms defined in the Glossary, are consistent and applied in a rigorous manner.
---	-----	---

In this filing, the Coordinator responds to all of these requests with the exception of request No. 2, as there were no changes between February 1, 2021, and October 1, 2021, for facilities whose registration was changed in the Register.

### 3. CHANGES TO THE REGISTER

In the following sections and subsections, the Coordinator presents the proposed Register changes as part of the 2021 statutory update.

In addition to the changes presented in the following sections and subsections, the Coordinator proposes to replace the Hydro-Québec TransÉnergie logo on the Register header with the Hydro-Québec logo (identical to the one in this document). This change is in line with Hydro-Québec's recent shift to groups rather than divisions.

#### 3.1. Section 2 – Impacted Entities

The Coordinator proposes the removal of the line mentioning that the Register identifies the owners or operators of a transmission line operated at 200 kV or above on page 4 of the Register. The Coordinator justifies the removal in Section 3.3.1 of this document.

#### 3.2. Appendix A – Entities

The Coordinator proposes changes to Appendix A of the Register. These changes are presented in the following subsections.

##### 3.2.1. Changes to the entity Hydro-Québec – Contrôle des mouvements d'énergie (a branch of HQT) (HQCMÉ)

The Coordinator proposes to change the name of the entity in the Register to reflect the Régie's Decision D-2021-064.<sup>3</sup> To this end, the Coordinator proposes the changes indicated in the following table:

Current name of entity	Proposed name of entity	Current acronym	Proposed acronym
Hydro-Québec – Contrôle des mouvements d'énergie (a branch of HQT)	Hydro-Québec, Coordonnateur de la fiabilité (the "Coordinator")	HQCMÉ	HQCF

<sup>3</sup> Régie de l'énergie, Decision D-2021-064, retrieved October 21, 2021, from [http://publicsde.regie-energie.qc.ca/projets/522/DocPrj/R-4103-2019-A-0016-Dec-Dec-2021\\_05\\_18.pdf](http://publicsde.regie-energie.qc.ca/projets/522/DocPrj/R-4103-2019-A-0016-Dec-Dec-2021_05_18.pdf) (in French only)

The change in the entity's name to Hydro-Québec – Coordonnateur de la fiabilité is proposed in order to maintain the same nomenclature in the Register and in the Coordinator's documentation despite any potential reorganization within Hydro-Québec.

To maintain traceability regarding the Reliability Coordinator designation, the Coordinator proposes to add a footnote indicating the most recent Régie decision that deals with the Reliability Coordinator designation. The footnote would be changed each time the Régie issues a new decision regarding the Reliability Coordinator designation. In this case, the Coordinator proposes the following footnote: In its Decision D-2021-064, the Régie designated the Direction Principale – Contrôle des mouvements d'énergie et exploitation du réseau d'Hydro-Québec as the Reliability Coordinator for Québec.

Regarding the proposed acronym (HQCF), the Coordinator is of the opinion that the proposed change corresponds to the entity's modified name.

In addition, the Coordinator proposes to change the entity's address to the following:

Complexe Desjardins  
C.P. 10000, 13e étage  
Montréal, Qc H5B 1H7

In this case, only the floor of the address has been changed compared with the address currently in the Register.

### 3.2.2. Changes to the Hydro-Québec TransÉnergie entity

An internal reorganization at Hydro-Québec in 2021 resulted in the Hydro-Québec TransÉnergie (HQT) entity becoming the Groupe – TransÉnergie et Équipements (HQT). To this end, the Coordinator proposes to change the entity's name and acronym as indicated in the following table:

Current name of entity	Proposed name of entity	Current acronym	Proposed acronym
Hydro-Québec TransÉnergie	Hydro-Québec, GTE (the "Transmission Provider")	HQT	HQT

The name change for the HQT entity also requires an amendment to Section 3.1 of the Register where the Hydro-Québec TransÉnergie entity is mentioned. Furthermore, this requires that the entity's name indicated in Section 3.1 of the Register be changed to reflect the Coordinator's proposal in the table above.

### 3.2.3. Changes to the Hydro-Québec Distribution entity

An internal reorganization at Hydro-Québec in 2021 resulted in the Hydro-Québec Distribution (HQD) entity becoming the Groupe – Distribution, approvisionnement et services partagés (HQD). To this end, the Coordinator proposes to change the entity's name and acronym as indicated in the following table:

Current name of entity	Proposed name of entity	Current acronym	Proposed acronym
Hydro-Québec Distribution	Hydro-Québec, Groupe – Distribution, approvisionnement et services partagés (the “Distribution Provider”)	HQD	HQD

### 3.2.4. Changes to the Hydro-Québec Production entity

An internal reorganization at Hydro-Québec in 2021 resulted in the Hydro-Québec Production (HQP) entity becoming the Groupe – Innovation, production, santé, sécurité et environnement (HQP). To this end, the Coordinator proposes to change the entity’s name and acronym as indicated in the following table:

Current name of entity	Proposed name of entity	Current acronym	Proposed acronym
Hydro-Québec TransÉnergie	Hydro-Québec, GIPSSE (the “Generator”)	HQP	HQP

The name change for the HQP entity also requires an amendment to Section 3.1 of the Register where the Hydro-Québec Production entity is mentioned. Furthermore, this requires that the entity’s name indicated in Section 3.1 of the Register be changed to reflect the Coordinator’s proposal in the table above.

### 3.2.5. Removal of the column for transmission lines operated at 200 kV or above

The Coordinator proposes to remove the column for transmission lines operated at 200 kV or above. The Coordinator’s reasons are described in Section 3.3.1 of this document.

## 3.3. Appendix B – Transmission facilities

### 3.3.1. Removal of the column “Transmission lines operated at 200 kV or above”

In the first application in which the Coordinator requested the Régie to adopt the Register (Docket R-3699-2009), the Coordinator proposed that transmission lines operated at 200 kV or above be identified in the Register, regardless of the type of system to which they belong, and that they be specifically targeted for the application of FAC-003-1, the purpose of which is to control vegetation in transmission rights-of-way.

The Régie, in its Decision D-2011-068,<sup>4</sup> accepted the Coordinator's proposal on the basis of its stated reasons.

However, FAC-003 has changed since this decision and version 4 of the standard has been in effect in Québec since April 1, 2021. Today, FAC-003-4 covers not only overhead transmission lines operated at 200 kV or above, but also overhead transmission lines operated at less than 200 kV and designated by the Planning Coordinator as part of an IROL under Reliability Standard FAC-014.<sup>5</sup>

However, the implementation of FAC-003 has changed and can no longer be monitored by the Register as the application of Reliability Standard FAC-014 is overseen by the entities responsible for its application, which in this case is the Planning Coordinator. Furthermore, the responsible entity must identify its facilities to which FAC-003 is applicable.

Therefore, maintaining information in the Register to identify transmission lines operated at 200 kV or above is no longer relevant for reliability. For these reasons, the Coordinator proposes to remove the column "Transmission lines operated at 200 kV or above" from Appendix B as well as any other similar reference in the Register. (See sections 3.1 and 3.2.3 of this document.)

### **3.4. Appendix C – Generating facilities**

No changes were proposed.

### **3.5. Appendix D – Application of CIP Standards, Version 5**

The Coordinator proposes the removal of Appendix D for the following reasons:

In its Decision D-2016-119,<sup>6</sup> the Régie de l'énergie established different effective dates for entity compliance with version 5 of the CIP standards based on whether the entities were identified in the Register of Entities in effect at the time of the decision as having critical assets for the purposes of CIP standards, version 1.

The addition of this appendix was approved in Decision D-2018-149 of the Régie de l'énergie. However, changes in the reliability standards results in this appendix no longer being as relevant as it once was. Specifically, the CIP standards have changed since that decision. Among other things, the Coordinator recently submitted to the Régie CIP-012-1 (Docket R-4148-2021) and standards CIP-005-7, CIP-010-4 and CIP-013-2 (Docket R-4173-2021) for adoption.

---

<sup>4</sup> Régie de l'énergie, Decision D-2011-068, retrieved October 22, 2021, from <http://www.regie-energie.qc.ca/audiences/decisions/D-2011-068.pdf> (in French only)

<sup>5</sup> FAC-014-2 came into effect in Québec on January 1, 2016.

<sup>6</sup> Régie de l'énergie, Decision D-2016-119, retrieved October 21, 2021, from [http://publicsde.regie-energie.qc.ca/projets/335/DocPrj/R-3947-2015-A-0022-Dec-Dec-2016\\_07\\_29.pdf](http://publicsde.regie-energie.qc.ca/projets/335/DocPrj/R-3947-2015-A-0022-Dec-Dec-2016_07_29.pdf) (in French only)

The Coordinator reiterates the same reasons it provided in its responses to the Régie's Request for Information No. 1 in Docket R-4154-2021<sup>7</sup> to justify the removal of Appendix F.

The CIP standards are part of a specific framework that is separate from the normal transmission system operating framework. Considering the importance it assigns to the protection of critical infrastructure with the objective of preventing potential physical and cyber attacks, it would be undesirable, in the public interest, to identify the responsible entities having critical assets as defined in the CIP standards.

Furthermore, the Coordinator reiterates that the identification of critical assets as defined in the CIP standards is under the control of the responsible entities subject to the standards. It is our understanding that the Régie concurs with the Coordinator's view that the identification of these systems and assets, to which the CIP standards apply, is the responsibility of the entities that own them. It concurs with the Coordinator's view that it can no longer carry out this activity for all registered entities in Québec. This would be a largely discretionary designation, if made by the Coordinator.

For the reasons set out above, the Coordinator is of the opinion that the removal of Appendix D from the Register is reasonable, non-discriminatory and in the public interest.

### **3.6. Appendix E – Special Protection Systems**

The Coordinator proposes the removal of Appendix E for the following reasons:

In Decision D-2020-134,<sup>8</sup> a footnote was added to Appendix E to remove the prescriptive aspect from that appendix. The identification of Special Protection Systems is the responsibility of the impacted entities and identification is mandatory under PRC-005-6 and PRC-012-2, both of which are currently in effect in Québec.

Previously, in its Decision D-2020-167,<sup>9</sup> the Régie did not accept the Coordinator's request in Docket R-4070-2018 to remove Appendix E from the Register. However, since the above-mentioned decision was issued,<sup>10</sup> the mandatory reliability regime in Québec has changed. Among other things, PRC-012-2 came into force and the Régie accepted the request to remove Appendix F from the Register in its Decision D-2021-110<sup>11</sup> for reasons similar to those presented

---

<sup>7</sup> Docket R-4154-2021 requesting approval of the Register of Entities subject to Reliability Standards, retrieved October 21, 2021 from <http://publicsde.regie-energie.qc.ca/layouts/publicsite/ProjectPhaseDetail.aspx?ProjectID=580&phase=1&Provenance=A&generate=true> (in French only)

<sup>8</sup> Régie de l'énergie, Decision D-2020-134, retrieved October 21, 2021, from [http://publicsde.regie-energie.qc.ca/projets/536/DocPrj/R-4117-2020-A-0012-Dec-Dec-2020\\_10\\_16.pdf](http://publicsde.regie-energie.qc.ca/projets/536/DocPrj/R-4117-2020-A-0012-Dec-Dec-2020_10_16.pdf) (in French only)

<sup>9</sup> Régie de l'énergie, Decision D-2020-167, retrieved October 22, 2021, from [http://publicsde.regie-energie.qc.ca/projets/483/DocPrj/R-4070-2018-A-0046-Dec-Dec-2020\\_12\\_11.pdf](http://publicsde.regie-energie.qc.ca/projets/483/DocPrj/R-4070-2018-A-0046-Dec-Dec-2020_12_11.pdf) (in French only)

<sup>10</sup> *Idem.*

<sup>11</sup> Régie de l'énergie, Decision D-2021-110, retrieved October 22, 2021, from [http://publicsde.regie-energie.qc.ca/projets/580/DocPrj/R-4154-2021-A-0011-Dec-Dec-2021\\_08\\_27.pdf](http://publicsde.regie-energie.qc.ca/projets/580/DocPrj/R-4154-2021-A-0011-Dec-Dec-2021_08_27.pdf) (in French only)

here, namely, that the identification of Special Protection Systems is the responsibility of the entities subject to PRC-005-6 and PRC-012-2.

To this end, the Coordinator is of the opinion that maintaining Appendix E in the Register is no longer useful and, to avoid any confusion on the part of the impacted entities, it is preferable to remove Appendix E than to maintain it in the Register. This proposal to remove the appendix is in line with the Coordinator's objective to retain only elements of a prescriptive nature in the Register in order to make it easier to read and to avoid the inclusion of superfluous information.

#### **4. PROPOSAL TO ENSURE THAT REFERENCES, IN THE REGISTER AND TO TERMS DEFINED IN THE GLOSSARY, ARE CONSISTENT AND APPLIED IN A RIGOROUS MANNER**

The Coordinator has carried out a complete validation of the alignment of the French and English versions of the Register. Furthermore, the Coordinator filed an attestation validating that the review work was completed.

For future statutory updates of the Register, the Coordinator proposes to the Régie that it provide an attestation only for changes made to the Register between the version filed and the version in effect.

#### **5. CONCLUSION**

The Coordinator is of the opinion that the proposed changes to the Register comply with the *Act respecting the Régie de l'énergie* and the relevant orders of the Régie, and that they contribute to the proper operation of the mandatory reliability system in Québec.