

**Traduction attestée de la procédure
d'identification des éléments du réseau de
transport principal**



I hereby certify that this is a complete and accurate translation into English of the attached French document.

A handwritten signature in black ink, appearing to read 'Tomczyk'.

Anna Tomczyk, Certified Translator
OTTIAQ, Member No. 7979
Signed in Montréal, Québec, on November 30, 2023

Main Transmission System

Procedure for identifying Elements of the Main Transmission System (RTP)

Reliability Coordinator for Québec

Version 1.0

1 Version history

| Version | Reason for the modification | Date |
|---------|--|----------------|
| 1.0 | First release. Acknowledged by the Régie in Decision D-20XX-XYZ. | Month XX, 20XX |
| 1.0 | Effective date | Month XX, 20XX |

2 Associated documents

| Document title |
|---|
| Definition of Main Transmission System |
| Annual self-declaration form |
| RTP Exception Request form |
| Reference document on Main Transmission System definition |
| Annual Self-declaration for Registered Entities – Guideline |

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3 Definitions

To facilitate the reading and understanding of the text, the Reliability Coordinator (the “Coordinator”) uses the definitions in Québec’s *Glossary of Terms and Acronyms Used in Reliability Standards* (hereinafter the “Glossary”), which is based on the *NERC Glossary of Terms Used in Reliability Standards*. Defined terms and acronyms in the Glossary are capitalized in English and written in italics in French.

For example: The term Main Transmission System (RTP) is in the Glossary.

For the sake of understanding the text, the Coordinator refers to the following additional definitions:

Definitions for the purpose of understanding

| Term | Acronym | Definition |
|------------------------------|---------|--|
| Requesting Entity | | This means an entity: <ul style="list-style-type: none"> - recorded in the Register of Entities Subject to Reliability Standards - covered by the reliability standards, and - who is submitting an RTP Exception Request to the Coordinator |
| RTP Exception Request | | An application whereby a Requesting Entity in Québec wishes to obtain an exception that has the effect of: <ul style="list-style-type: none"> - including in the RTP an Element or group of Elements that would otherwise be excluded by the application of the RTP definition, or - excluding from the RTP an Element or group of Elements that would otherwise be included by applying the RTP definition. |

4 Purpose

Under the *Act respecting the Régie de l'énergie*, the Coordinator must submit for approval a Register of Entities subject to Reliability Standards (hereinafter the "Register"), which includes a list of Facilities that are part of the RTP. In order to fulfil its record keeping obligations with respect to the Register, the Coordinator seeks the cooperation of the entities covered by the Reliability Standards.¹

The purpose of this document is to assist covered entities in the proper application of the RTP definition and to provide a framework for the Register update process. Thus, it will allow the Coordinator to have, under the *Act respecting the Régie de l'énergie*, all the data and information it needs to monitor and fulfill its obligations with respect to the Register as regards Reliability Standards.

This document has no equivalent outside of Québec, as the scope of North American Electric Reliability Corporation (NERC) Reliability Standards is defined by the Coordinator and approved by the Régie.

¹ Entities subject to the Reliability Standards are listed in Section 85.3 of the *Act respecting the Régie de l'énergie*.
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5 Definition of Main Transmission System (RTP)

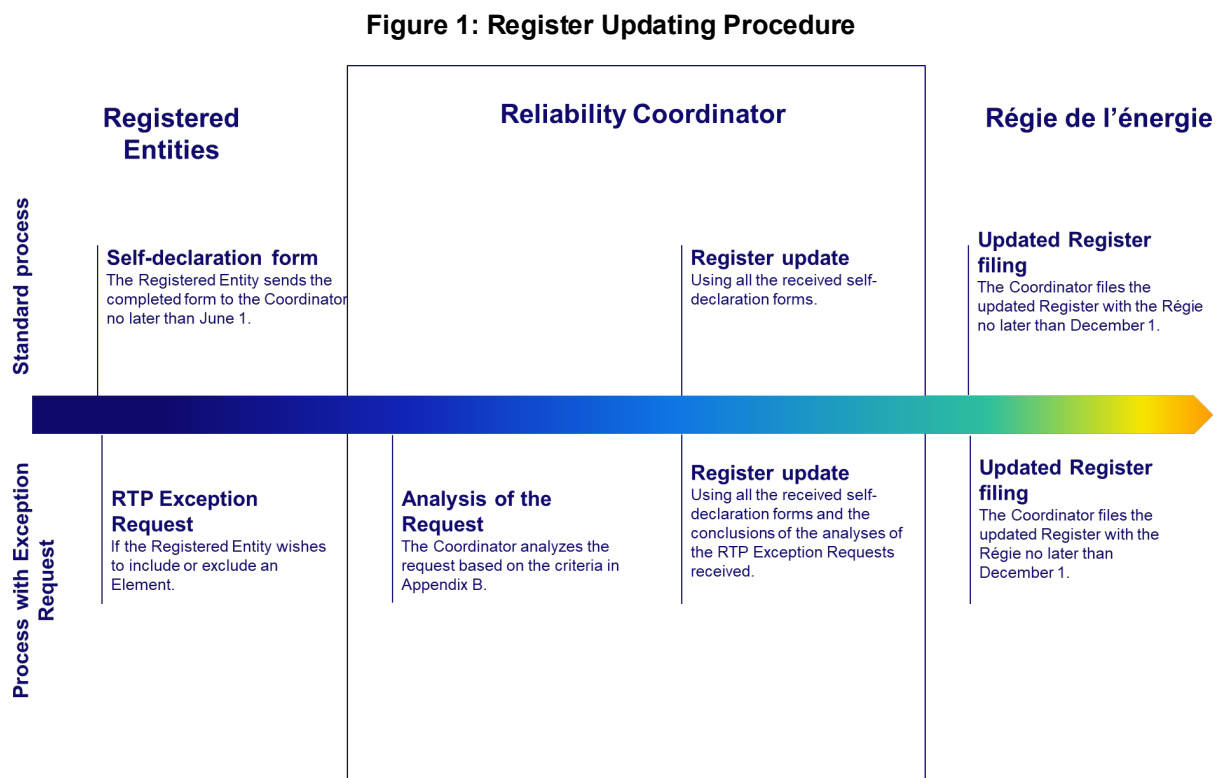
The RTP definition can be viewed on the [Coordinator's website](#), under the Documentation tab, [Main Transmission System \(RTP\)](#) tab, in the document entitled *Definition of the Main Transmission System*. The definition can also be consulted in the Glossary.

6 Register updating procedure

Each year, the entities covered by the Reliability Standards (Registered Entities) send the Coordinator the annual self-declaration form. Based on the forms received, the Coordinator updates the Register and files it with the Régie. This process must comply with the deadlines set out in Section 8.1 of this document.

A Registered Entity may request and obtain an RTP exception to have an Element or group of Elements removed from or included in the RTP. The Requesting Entity must send the RTP Exception Request form to the Coordinator at the same time as its self-declaration form, or at any time during the year following a change in its Facilities. The Coordinator will review the application and, for all applications received before June 1, will take into account the conclusion of the analysis in the annual update of the Register.

The process of updating the Register is illustrated graphically in Figure 1.



The annual self-declaration and RTP Exception Request forms can be found in Appendix A of this document.

6.1 Data and information required to update the Register

Registered Entities are responsible for submitting the **self-declaration form** annually, which contains a tabular list of their Facilities subject to Reliability Standards and their respective equipment. This table must be submitted in Track Changes mode in order to allow the Coordinator to properly identify the modifications made to the Québec power system since the last update. The Coordinator provides a template in the form of an Excel spreadsheet to help guide the Registered Entities in the completion of their self-declarations.

In the event that a Registered Entity does not have the expertise to produce the list described above, then the Registered Entity may submit one (1) single-line diagram of its complete electrical system as an appendix to the self-declaration form. This diagram must contain, for each Facility and equipment, its name, its operating voltage and its gross nameplate rating, if applicable. It must also indicate the additions and deletions of Facilities or equipment, in order to provide an overall picture of the modifications made to the Québec power system. This diagram will subsequently be used by the Coordinator to apply the RTP definition and update the Register.

6.2 Exception request

A Requesting Entity may request and obtain an RTP exception to have an Element or group of Elements removed from or included in the RTP.

An RTP Exception Request for a connection point with a neighboring jurisdiction will be analyzed, provided that the Requesting Entity provides confirmation that an exception request has also been made in the other jurisdiction for the same Facility. Prior to concluding its analysis, the Coordinator will consult with the regulatory agency or regional entity to ensure that there is no additional technical background that would impact the neighboring jurisdiction that needs to be considered in the RTP Exception Request. In doing so, the Coordinator wishes to maintain harmonization with neighboring systems.

In the case of a newly constructed or installed Element that is included in the RTP by application of the RTP definition, but for which a Requesting Entity wishes to submit an RTP Exception Request to exclude the element from the RTP, the request must be made at least twelve (12) months prior to commissioning the Element.

It is the responsibility of the Requesting Entity to provide the relevant documentation to enable the Coordinator to analyze an RTP Exception Request. However, should a Requesting Entity be unable to conduct the studies required to complete an RTP Exception Request on its own, the Coordinator may assist the Requesting Entity in the completion of such studies, provided that the RTP Exception Request is deemed relevant by the Coordinator's preliminary analysis.

6.2.1 Reasons for an exception request

A Requesting Entity that requests an RTP exception from the Reliability Coordinator to exclude an Element from the RTP must provide the reasons for doing so in the **RTP Exception Request form**. The Coordinator's evaluation criteria are provided in Appendix B.

Conversely, a Requesting Entity may request an RTP exception to include an Element in the RTP on the basis that an element excluded by the RTP definition is necessary for the Reliable Operation of the RTP based on the reasons indicated in the **RTP Exception Request form**.

6.2.2 Submission and information required for an exception request

The Requesting Entity must fill out the RTP Exception Request form provided in Appendix A.

A separate RTP Exception Request must be submitted for each Element or group of Elements for which the Requesting Entity wishes to obtain an exception under the RTP definition (or criteria). The scope of an RTP Exception Request must cover the connecting terminals of the Element or group of Elements identified in the request.

An exception request can cover a group of Elements when the Requesting Entity seeks an exception to the RTP definition for multiple similar Elements (located at the same location or distributed at different locations in Québec) for the same reasons. In such a case, the requests for all these Elements may be grouped in a single RTP Exception Request comprising all the Elements or groups of Elements duly identified separately.

6.2.3 Analysis of an exception request

The Coordinator first validates whether the request is complete and admissible before proceeding with the analysis. If an RTP Exception Request is incomplete, the Coordinator notifies the Requesting Entity in writing that additional information is required. The Coordinator may also request that the Requesting Entity modify its request (if, for example, the request covers several Elements that need to be analyzed separately).

The Coordinator and the Requesting Entity must establish milestones to complete the analysis of the request within a reasonable time frame, within six (6) months of confirmation that the RTP Exception Request and the additional information are complete. These milestones include the preliminary analysis and in-depth analysis, if required, as specified in the RTP Exception Request form in Appendix A.

At the request of the Coordinator, the Requesting Entity or the owner and/or operator of the Element must provide the information requested by the Coordinator within thirty (30) days, if the latter deems additional information is necessary for the analysis of the application.

One or more requests for information may be sent at any time during the analysis of an application. The Coordinator reserves the right to adjust the time required to complete the analysis.

6.2.4 Conclusions of the analysis

After the analysis of the RTP Exception Request, the Coordinator provides a preliminary conclusion to the Requesting Entity, including the Coordinator's assessment of the admissibility of the request in its entirety.

The Requesting Entity thus has the opportunity to examine the Coordinator's preliminary finding, and to verify whether the information contained therein is accurate and complete according to the information that has been submitted. The time limit for the examination of the preliminary finding is fifteen (15) days.

The Coordinator may review its preliminary finding if additional information has been submitted or referred to by the Requesting Entity as a result of its examination. Once the preliminary finding has been reviewed, the Coordinator submits a final conclusion to the Requesting Entity. This conclusion fully accepts, partially accepts or denies the application. The conclusion is submitted in writing and is based on the criteria in Appendix B.

Based on the conclusion of its analysis, the Coordinator will update the Register to include any exceptions granted to Requesting Entities as a result of RTP Exception Requests. The decisions to approve or deny RTP Exception Requests will be submitted to the Régie during the annual statutory update of the Register.

If a Requesting Entity is not satisfied with the Coordinator's conclusion, it may apply to the Régie to intervene in the docket concerning the annual statutory update of the Register.

Once an RTP exception has been granted to a Requesting Entity, the latter must comply with all the conditions of the RTP exception.

The Coordinator may require supporting documentation or evidence that demonstrates the Requesting Entity's compliance with the RTP exception.

6.2.5 Period for implementing an RTP exception

For any RTP Exception Request, the owner or the operator of the Element must submit an implementation plan to the Coordinator to comply with the Reliability Standards applicable to the Element covered by the exception.

In adopting the annual statutory update of the Register submitted by the Coordinator, the Régie acknowledges, at the same time, the implementation plans for all RTP Exception Requests included in the update of the Register.

An RTP exception will usually be approved without a specific exception end time, but will be subject to review for continued justification for the RTP exception. An RTP exception may be withdrawn or amended by the Coordinator if changes occur in the Québec System that require such action. In its assessment, the Coordinator may consider the effect of the RTP exception on the Québec System, such as increased demand, removal or addition of resources, removal or addition of transmission lines, changes in connection points or changes in operating procedures, etc.

The owner or the operator of an Element that has been granted an RTP exception must notify the Coordinator within ninety (90) days of learning of any change in condition that could challenge the justification set forth by the Requesting Entity in support of its request.

Following such notification, the Coordinator must determine whether an analysis is required to revalidate that the rationale for the RTP exception is still valid. Following this analysis, the Coordinator will issue a conclusion.

If the Coordinator receives information, other than that described above, that the RTP exception is no longer justified, the coordinator may conduct an analysis to verify that the justification for the RTP exception is still valid.

If the Coordinator's conclusion, following its analysis, is to terminate the RTP Exception Request, the Coordinator must send a written notice of revocation to the Requesting Entity and to the operator or the owner of the Element affected by the exception request.

If a Requesting Entity wishes to extend the duration of an RTP exception that has been accepted by the Coordinator, but that has an end date, or for which a notice of revocation has been delivered, the Requesting Entity must file a new RTP Exception Request.

6.3 RTP Element identification methods

In accordance with the procedure herein, an Element can be categorized as included in or excluded from the RTP through one of three (3) methods:

1. By applying the RTP definition, including the inclusions and exclusions.

2. By obtaining approval from the Coordinator of the added or removed Elements via the RTP exception procedure.
3. By obtaining approval from the Régie that the Register has been updated to show the Elements added to or removed from the RTP, following a public consultation led by the Coordinator during which the Registered Entities had the opportunity to comment.

The Register is updated further to the application of the above three (3) methods on an annual basis as provided for in Figure 1.

7 Confidentiality

Any entity requesting confidential treatment of documents or information provided in support of an RTP Exception Request must notify the Coordinator and provide the following information:

1. A summary of the documents or information for which confidential treatment is requested.
2. The reasons for the request, including the nature of the harm that would result from disclosure of the documents or information.
3. The length of time for which the claim is to be treated as confidential, if applicable.

The Coordinator and the Requesting Entity must also determine which versions of the RTP Exception Request's documents may be disclosed on the Coordinator's website.

For more details about secure file transfer protocols, the Requesting Entity must contact the Coordinator at the email address fiabilite@hydroquebec.com, with the following subject headline: **Demande de transfert de fichiers sécurisé** [Request for secure file transfer].

8 Form submission

8.1 Submission schedule

Before June 1 of each year, or at any time during the year following a change in their Facilities, the persons responsible for the Facilities and Elements covered are responsible for sending the Coordinator a duly completed self-declaration form, as well as the RTP Exception Request form, if applicable. These forms can be found in Appendix A of this document.

The Coordinator will collect the forms from all persons responsible for the Facilities and Elements covered and will file an annual statutory update of the Register by December 1 of each year.

8.2 Recipient

The persons responsible for the Facilities and the Elements covered by the Register must send their duly completed self-declaration form and their RTP Exception Request form, if applicable, by email to the address indicated in the form:

fiabilite@hydroquebec.com

Appendix A: Forms

The forms associated with the procedure for identifying Elements of the RTP are available on the Coordinator's website at: <https://www.hydroquebec.com/reliability-coordinator/documentation/main-transmission-system.html>.

Appendix B: Criteria for Evaluating an Exception Request

This appendix describes the criteria for evaluating an RTP Exception Request.

Section 1: Preliminary questions before submitting an RTP Exception Request

A Facility owner should consider the following questions before submitting an RTP Exception Request to exclude an Element or group of Elements:

- a) Can comprehensive data and studies demonstrate that the Elements subject to the exception are not required for the Reliable Operation of the RTP?
- b) Is the Element in the following list? If so, it is unlikely that an RTP Exception Request will be granted for this Element^{32w 32w 32w 32w 32w 32w 32w 32w 32w 32w} □^{38w#}:
 - a. Elements classified as part of the NorthEast Power Coordinating Council (NPCC) Bulk System under Criterion A-10
 - b. Elements on the list of BES Cyber Systems classified as “High Impact” or “Medium Impact” under the NERC Critical Infrastructure Protection (CIP) standards, or on any other similar list
 - c. Electricity generation or storage Facilities required for system balancing or included in any supplemental service contract
 - d. Transmission Elements that are part of a Transfer Interface, transfer path, Interconnection Reliability Operating Limit (IROL) or Cranking Path
 - e. Elements included in the Transmission Operator’s Restoration Plan
 - f. International power line within the meaning of the *Canadian Energy Regulator Act*

Section 2: Criteria for an analysis based on Reliability Standards

The Coordinator may assess an RTP Exception Request based on the applicability of NERC Reliability Standards to the Element for which the exception is requested. This type of assessment is namely done to determine:

- a) If there are any significant deviations in system reliability as a result of the application of the exception.
- b) Whether it would be necessary to bring the Element into compliance with certain Reliability Standards to ensure that there is no significant deviation² in system reliability or negative impact on reliability.

² A significant deviation in system reliability occurs when Reliable Operation of the system is compromised.
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Section 3: Other criteria

The Coordinator may also consider other criteria in assessing an RTP Exception Request such as the following:

- a) The specific characteristics of the Facility in relation to the system characteristics and topology.
- b) The impact that this type of Facility may have on reliability, in consideration of other Facilities of the same type and the characteristics mentioned above.

Appendix C: Frequently Asked Questions

Q: What does the Coordinator mean by “static or dynamic devices”?

A: Static or dynamic devices supply or absorb Reactive Power. Reactive power is provided by generators, synchronous compensators, and electrostatic equipment such as condensers. Reactive Power directly influences electric system voltage. It is usually expressed in kilovars (kV) or megavars (Mvar).

Q: I am having difficulty determining which Elements are included in the RTP by applying its definition. Can the Coordinator provide a professional opinion on the application of the definition?

A: Yes. The Coordinator provides entities with support in interpreting the definition. Any questions regarding this matter can be sent to fiabilite@hydroquebec.com.

Q: Certain requirements under an exception request can only be carried out by the Coordinator and the Planning Authority (e.g., Study of the Element’s reliability impact on the entire RTP). Can the Coordinator and/or the Planning Authority produce these studies or provide the required data to the Requesting Entity so that it can submit an exception request?

A: The Coordinator understands that it may not be possible for all Requesting Entities to provide the studies required under the Exception Request process. In the case where a Requesting Entity is unable to do so, the Requesting Entity is asked to indicate in its exception request form that it requires the Coordinator’s support to carry out the various studies required for its exception request to be processed. In such a situation, the Coordinator may issue a notice to the entity regarding the need to carry out the studies based on the facts relevant to that exception request.

References

1. Québec's Glossary of Terms and Acronyms used in Reliability Standards
<http://www.regie-energie.qc.ca/en/audiences/NomesFiabiliteTransportElectricite/GlossaireTermesEtAcronymes-EN-20210312.pdf>
2. Glossary of Terms Used in NERC Reliability Standards
https://www.nerc.com/files/glossary_of_terms.pdf
3. Register of Entities Subject to Reliability Standards
http://www.regie-energie.qc.ca/en/audiences/NomesFiabiliteTransportElectricite/Registre-EN-2021_04_28.pdf
4. Definition of Main Transmission System (RTP)
<https://www.hydroquebec.com/data/transenergie/pdf/main-transmission-system-definition.pdf>
5. Reference document on Main Transmission System definition
<https://www.hydroquebec.com/data/transenergie/pdf/rtp-reference-doc-eng.pdf>
6. Decision D-2018-149 (in French only)
http://publicsde.regie-energie.qc.ca/projets/346/DocPrj/R-3952-2015-A-0062-Dec-Dec-2018_10_23.pdf
7. Decision D-2020-052 (in French only)
http://publicsde.regie-energie.qc.ca/projets/486/DocPrj/R-4073-2018-A-0013-Dec-Dec-2020_05_14.pdf