

Frequently Asked Questions

The 'Frequently Asked Questions' document gathers the questions submitted to the Équipe – Surveillance de la fiabilité des réseaux (ESF) within the framework of Compliance Monitoring of registered entities subject to Reliability Standards. It contains, in particular, questions that were submitted by the registered entities subject to Reliability Standards and that were addressed during the information session on December 10, 2015. You may send any additional questions to: secretariat-pscaq@regie-energie.qc.ca.

Definitions

Term	Definition or explanation
Requirement	A Reliability Standard includes in its B section a set of Requirements that define the obligations of certain (applicable) functions.
The Act	An Act Respecting the Régie de l'énergie (RLRQ, c. R-6.01.)
NERC	North American Electric Reliability Corporation. A North American organization with which the Régie entered into two agreements, in particular for the development of Reliability Standards.
NPCC	Northeast Power Coordinating Council Inc. A north-eastern organization of North America with which the Régie entered into two agreements, in particular for the monitoring of Reliability Standards.
QCMEP	Québec Reliability Standards Compliance Monitoring and Enforcement Program
Register	Register of Entities Subject to Reliability Standards

General Questions

Q1 What are Reliability Standards for electric power transmission systems?

R1 Reliability Standards are standards for the reliability of the Electric Power Transmission System, filed with the Régie, for adoption, by the Reliability Coordinator for Quebec, an entity designated by the Régie, . The Régie must ensure compliance with Reliability Standards it adopts. Section 85.10 of the Act states that the Régie may impose financial penalties in case of non-compliance with a Reliability Standard.

There are approximately 110 standards in effect in North America, including a dozen regional standards. The list of Reliability Standards in effect in Québec is available at the following link:

<http://www.regie-energie.qc.ca/en/audiences/NormesFiabiliteTransportElectricite/NormesFiabilite.html>

Q2 Who is the reliability coordinator for Québec?

R2 The NERC functional model identifies the reliability coordinator function and describes the responsibilities of this function.

In Québec, the section 85.5 of the Act grants power to the Régie to designate, on the conditions it determines, a reliability coordinator for Québec. Furthermore, the Act assigns certain responsibilities to the reliability coordinator, such as filing, for adoption, Reliability Standards with the Régie, which go beyond the NERC functional model.

In Québec, the Régie designated Direction – Contrôle des mouvements d'énergie (CMÉ) of Hydro-Québec TransÉnergie as the Reliability Coordinator for Québec (the Coordinator). For more information see « The designation of the Reliability Coordinator » section of the reliability web page on the Régie website available at the following link:

<http://www.regie-energie.qc.ca/en/audiences/NormesFiabiliteTransportElectricite/EncadrementReglementaire.html>

Q3 What are the jurisdictions with mandatory Reliability Standards in North America?

R3 Reliability Standards are mandatory throughout the United States (except Hawaii and Alaska), a small part of Mexico and in the Canadian provinces interconnected with the North American power system (British Columbia, Alberta, Saskatchewan, Manitoba, Ontario, Québec, New Brunswick and Nova Scotia).

Q4 What is the relationship between the Québec standards and those of other jurisdictions?

R4 The standards in all jurisdictions correspond, more or less exactly depending on jurisdiction, to the NERC standards. The only applicable standards in Québec from a compliance point of view are the standards adopted and put into effect by the Régie.

Q5 Why are there appendices to Reliability Standards adopted in Québec?

R5 In Québec, the Coordinator files with the Régie, for adoption, the French and English versions of the NERC standards. The Coordinator also files the French and English versions of the Québec Appendix (the Appendix) for each standard. The Appendix modifies, when appropriate, the application of the corresponding standard in the Quebec context. The text at the beginning of each Appendix specifies that:

« This appendix establishes specific provisions for the application of the standard in Québec. Provisions of the standard and of its appendix must be read together for the purposes of understanding and interpretation. Where the standard and appendix differ, the appendix shall prevail. »

Q6 In the United States, NERC and the Regional Entity (NPCC for the North-East) may impose financial penalties. Is that the case for Québec?

R6 In the United States, the governmental authority similar to the Régie, FERC, delegated a part of its authority to punish breaches to the standards to NERC, which thereafter delegated part of its authority to the Regional Entities. In Québec, only the Régie may impose financial penalties on a Quebec entity. The Régie signed two agreements with NERC and NPCC so that these organizations assist the Régie in the Québec Reliability Standards compliance monitoring. These organizations may also make recommendations to the Régie with regard to compliance monitoring.

Q7 What are the standards applicable to a registered entity?

R7 Each Reliability Standard may consist of one or more requirements. They apply to one or more functions and may, in certain cases, apply specifically to certain facilities or activities (for example, participation in a system restoration plan) of a registered entity subject to that standard or that requirement.

The Régie explains everything in its decision D-2015-059 at paragraph 125 (unofficial translation):

« On one hand, the standards and their Appendix must clearly identify the functions and, where applicable, the specific registered facilities, and on the other hand, the Register must include the necessary information which allow the identification of entities as per the NERC functional model or which own or operate the facilities subject to Reliability Standards and their Appendix. »

Pages 13-16 of the presentation on December 10, 2015 to the representatives of entities subject to Reliability Standards may be useful to understand the interaction of standards and the applicable functions with the Registry to determine the entities subject to standards. The presentation is available at the following link:

http://www.regie-energie.qc.ca/audiences/NormesFiabiliteTransportElectricite/Regie_Presentation_Session_Information_10dec2015.pdf

It is the responsibility of each entity to determine the standards that apply to it.

Q8 NERC reports its filings with Canadian jurisdictions, including Québec, on a web page of its website. Are these standards filed by NERC relevant to the mandatory regime in Québec?

R8 The Régie adopts only the standards filed by the Coordinator. NERC files with the Régie standards that NERC has filed with FERC, for informational purposes only.

Q9 How does an entity get into contact with the ESF?

R9 You may send an email to the following address: secretariat-pscaq@regie-energie.qc.ca.

Questions concerning entities' registration

Q10 How are entities registered in Québec?

R10 In Québec, the registration of entities subject to Reliability Standards in the Register of entities is a regulatory process. The Coordinator files for approval a register which identifies the entities subject to Reliability Standards adopted by the Régie (the Register). Refer to the « Register of Entities Subject to Reliability Standards » section of the reliability web page on the Régie website available at the following address:

<http://www.regie-energie.qc.ca/audiences/NormesFiabiliteTransportElectricite/RegistreEntites.html>.

The Register is updated when important changes are made, such as adding or removing an entity or a facility in the Register, or at least once a year (see decision D-2015-059 at paragraphs 791, 792 and 796).

Q11 What are the steps to follow for an entity to be added to or removed from the Register of entities subject to Reliability Standards and who is responsible in Québec of this process?

R11 The entity should make a request to the Reliability Coordinator for Québec (email address: fiabilite@hydro.qc.ca) in which the entity presents its arguments with respect to its inclusion in or removal from the Register. If this process fails to deliver the desired outcome, then the entity may contact the Régie at secretariat-pscaq@regie-energie.qc.ca.

Q12 To whom should changes in a company (sale of assets, suspension of activities, and modification of applicable functions) be addressed?

R12 For any change in assets or activities, the entity should send a request to the Reliability Coordinator for Québec and, if necessary, the Coordinator will modify the Register and will file it after with the Régie (email address of the Coordinator: fiabilite@hydro.qc.ca).

In case of change in a company's Designated Contact information for the purposes of Reliability Standards, one must contact the Régie at secretariat-pscaq@regie-energie.qc.ca.

Q13 Should all registered entities register with NERC or should only Hydro-Québec? If yes, is being registered with NERC necessary or should the entity register with other organizations?

R13 A Quebec entity does not have the obligation to register itself for its activities in Québec. The Coordinator should register the entity for its activities in Québec in the Register filed with the Régie.

It is an entity's decision to register with NERC, but this registration has no impact with respect to the mandatory compliance with Québec Reliability Standards. Furthermore, NPCC representatives mentioned at the December 10th meeting that entity registration with NERC or NPCC was not necessary to participate in NERC processes (for example, standards development).

Q14 When is the entity supposed to register if it is the entity's responsibility?

R14 The Reliability Coordinator is responsible to update the Register. See previous answer.

Q15 Does a promoter/firm register itself or each of its projects with supply contract? In the latter case, if several eligible projects are at the same interconnection point, should each project be registered individually or not?

R15 In Québec, the Coordinator registers the entities subject to Reliability Standards in the Register. In principle, distinct entities should be individually registered. However, an entity may be registered with greater granularity though. For example, a GOP that owns different facilities (such as different locations and different contracts) could request the Coordinator:

- (1) that it be registered as an entity subject to standards;
- (2) that its different facilities be individually registered.

Questions concerning Reliability Standards

- Q16** If one notices a difference between the standard published on the Régie website and the one published on the Reliability Coordinator's website, what is the standard an entity should comply with?
- R16** The text on the Régie website is the reference for enforcement in Québec. However, it is important to inform the Régie of any difference between these standards at secretariat-pscaq@regie-energie.qc.ca.
- Q17** On the Régie website one may see the French and English versions of the effective Reliability Standards. Which one prevails? Is one version more precise than the other one?
- R17** The French and English versions are deemed of equal value. Neither prevails over the other. Because they are deemed equal, an interpretation may seek meaning in both versions in order to make clear the purpose of the standard. An entity, facing difference in interpretation between the two versions, may attempt to argue its point of view. The Régie will thereafter judge as to what interpretation to be given.
- Q18** On the NERC website, the text of the standards is different from the text of the effective standard in Québec. Which version should be used: the English version on the NERC website or the English version on the Régie website?
- R18** The standard on the Régie website is effective in Québec. However, any inconsistencies should be communicated to the Régie at the following address: secretariat-pscaq@regie-energie.qc.ca.
- However, it is important to ensure that you compare the correct versions of the standard. The number of compared standards (i.e. TOP-001-1a) must be identical.
- Q19** If the Régie put into effect a standard which is outdated at NERC, which version is applicable: the NERC standard or the one put into effect by the Régie?
- R19** When a standard is effective in Québec it becomes mandatory.

Questions concerning compliance with standards

- Q20** If a form is missing, wrong or incomplete on the Régie website, whom one may notify?
- R20** One must contact the Régie at the following email address: secretariat-pscaq@regie-energie.qc.ca.

Q21 **Must the « NERC » subject matter expert (or the Reliability Standards Compliance subject matter expert) be an employee of the entity or may he or she be a third party working for the entity?**

R21 The registered entity subject to Reliability Standards is responsible for its compliance with those standards, but the entity may get help from a third party. The same principle applies if the entity delegates its responsibility to a third party entity.

Q22 **What are the applicable functions?**

R22 The applicable functions of a Reliability Standard are the functions identified in the « Applicability » section of a standard. The Requirements of a standard impose obligations to these applicable functions.

The functions group together certain facilities, activities and responsibilities in order to simplify the applicability of standards. The NERC functional model on the NERC website « NERC Functional Model version 5 » can serve as a useful reference.

Q23 **What does GO and GOP mean? What entity should be a GO and GOP?**

R23 GO and GOP are defined terms in the glossary of terms and acronyms filed with the Régie by the Coordinator.

For example, GO – Generator Owner: Entity that owns and maintains generating units.

GOP – Generator Operator.

Both terms are functions in the NERC functional model (see answer to question Q22). For example, the GO, in the NERC functional model, provides for the maintenance of its generation facilities and determines equipment operating limits as well as its protection systems.

What entity should be a GO and GOP? The Coordinator identifies and registers the entities in the register, including GO and GOP.

- Q24** For the TOP-001-1a standard (and others), what is the contact information (name, phone number, other available means of communication, etc.) to contact, in real-time and planned mode, the persons responsible for the following functions:
- a. Transmission Operator;
 - b. Balancing Authority;
 - c. Reliability Coordinator;
 - d. Load-Serving Entity.

For the PRC-001-1 standard: In order to comply with requirements R3.1 and R5.1, what is the entry point of the Balancing Authority and of the Transmission Operator (name, contact information, etc.)?

- R24** At the information session on December 10, 2015, the Coordinator invited the persons interested in obtaining this contact information to send an email to the following address: fiabilite@hydro.qc.ca.

Any questions in this regard can also be sent to the following address: secretariat-pscaq@regie-energie.qc.ca.

- Q25** For the BAL-005-0.2b standard: In what way, may a power plant owner and power plant operator demonstrate that its generating facilities are included or not within the metered boundaries of the Québec Balancing Authority Area?

- R25** Since the Coordinator also assumes the Balancing Authority function for Québec, all facilities identified in the Register are presumed to be included within the metered boundaries of the Balancing Authority Area. The Coordinator also stated during the information session on December 10, 2015 that it may provide certificates for this purpose. These certificates may allow an entity, struggling with a complex situation, to prove its compliance (for example, for border facilities which participate in more than a Balancing Authority Area).

Questions concerning the ‘What’s new in Québec Reliability Standards Compliance Monitoring and Enforcement?’ newsletter

- Q26** What are the steps to follow for a designated person in a company to receive the ‘What’s new in Québec Reliability Standards Compliance Monitoring and Enforcement?’ newsletter?

- R26** This person may subscribe to a distribution list on the following web page:

<http://www.regie-energie.qc.ca/abonnement/index.php>.

One may either send an email to the following email address: secretariat-pscaq@regie-energie.qc.ca.

Q27 What is the frequency of the 'What's new?' newsletter?

R27 The 'What's new?' is sent when needed. Normally, the newsletter is issued once a month.

Questions concerning Québec Reliability Standards Compliance Monitoring and Enforcement Program (QCMEP)

Q28 Will the Régie take into account the comments of the registered entities subject to Reliability Standards during a future revision of QCMEP?

R28 Yes, the Régie intends to undertake a consultation process during a possible revision of QCMEP.

Question concerning confidentiality of filed documents

Q29 Should a request for confidential treatment must accompany or precede the filing with the Régie of each document related to QCMEP?

R29 No. The second agreement and the QCMEP state that all documents are treated as confidential. The only exception is when the Régie determines that a violation with one or more Reliability Standards has occurred. In this case, the Régie will publish certain information related to the violation. The submitter will have the opportunity to comment the scope of information before it is published.