



FOR GENERATIONS

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Via email: PartVIConsultation@neb-one.gc.ca

September 30, 2013

Part VI Export and Import Consultations

Attention: Suchaet Bhardwaj

444 Seventh Avenue SW

Calgary, Alberta T2P 0X8

Dear Mr. Bhardwaj:

**RE: National Energy Board (NEB)
British Columbia Hydro and Power Authority (BC Hydro)
Proposed Changes to NEB Export and Import Regulatory Framework
File Ad-GA-ActsLeg-Fed-NEBA-Amend 0101**

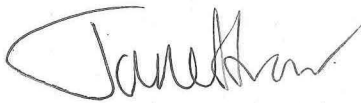
BC Hydro writes to the NEB to provide its comments to the NEB's proposed amendments to the National Energy Board Export and Import Reporting Regulations (**Reporting Regulations**), as requested in the NEB's letter under the subject file of August 29, 2013.

BC Hydro is the holder of NEB Export Permits EPE-298 (Border Accommodation), EPE-335 (Carrier & Adjustment Transfers) and EPE-337 (Storage/Equichange) and provides monthly reporting to the NEB for each of these electricity export permits. BC Hydro has reviewed the proposed amendments to the Reporting Regulations and notes that it currently provides in its monthly reporting the information outlined in the new section 8.(1). BC Hydro does not have concerns with the existing reporting format, but seeks clarification from the NEB that the new section 8.(1)(f), which requires licence or permit holders to report "the destination within the importing country to which the electricity was exported", will not require a more precise destination than is currently reported (i.e., the State level). A level of granularity more precise than the State level cannot be determined for inadvertent flows because the required information on actual energy flows is not available.

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British Columbia Hydro and Power Authority (BC Hydro)
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For further information, please contact Gordon Doyle at 604-623-3815 or by email at bchydroregulatorygroup@bchydro.com.

Yours sincerely,



Janet Fraser
Chief Regulatory Officer

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Attention: Suchaet Bhardwaj
Suchaet.Bhardwaj@neb-one.gc.ca