

Projet QC-2026-06  
 Réponses aux commentaires reçus pendant la période de consultation

Mai 2026

Ce document est une synthèse des commentaires présentés par les entités, tels qu'ils ont été reçus et dans la langue et selon la rédaction utilisée par celles-ci pendant la période de consultation portant sur le projet QC-2026-06.

Document visé	Section visée	Commentaire	Entité	Réponse du coordonnateur de la fiabilité
Registre	Colonnes GO et GOP	<p><b>Commentaires préliminaires</b> à la consultation publique et pris en considération à l'ajustement du Registre (échanges par courriel du Coordonnateur de la fiabilité) :</p> <p>"We would appreciate clarification on the technical basis for identifying these facilities as "non-RTP Inverter-Based Resources" subject to the Category 2 registration criteria. Mont Copper and Mont Miller are equipped with Type 2 wind turbines. Under NERC's current framework, Type 1 and Type 2 wind turbines are generally not classified as inverter-based resources, as the IBR definition applies to resources that export power through a power electronic interface and is typically associated with Type 3 and Type 4 wind technologies.</p> <p>You noted that the Reliability Coordinator previously communicated with site personnel regarding this registration. As our site operations teams are not typically involved in NERC registration matters, it is possible that turbine technology details were not fully considered in those discussions.</p> <p>Could you please confirm whether Quebec has adopted a definition or interpretation of "Inverter-Based Resource" for Category 2 registration that includes Type 1 and/or Type 2 wind turbines? Additionally, we would appreciate any available detail on the anticipated timing of the public consultation notice related to the implementation plan.</p> <p>We appreciate your assistance in clarifying these points and look forward to aligning on the appropriate registration and compliance obligations."</p>	NextEra	<p>The Coordinator would like to thank the entity for its participation during the public consultation.</p> <p>"The current assessment framework applied in Québec is based on the decisions issued by the Régie de l'énergie in the context of the adoption of reliability standards <a href="#">PRC-028-1</a> and <a href="#">PRC-002-5</a>. (Project 2021-04 by the NERC: <a href="#">2021-04 Modifications to PRC-002 - Phase II</a>)</p> <p>More specifically, the Régie's decision introduced revised criteria for the identification and registration of Generator Owner/Generator Operator (GO/GOP) entities, including Category 2 entities, which extend beyond a strict technology-based interpretation of inverter-based resources. Based on your previous e-mail, it is my understanding that your installations are solely composed of Type 1 and Type 2 facilities.</p> <p>I would also like to draw your attention to the attached documentation, which provides additional context on the Québec assessment framework and recent developments. More information is also available on the Régie de l'énergie website: <a href="#">Reliability Standards effective at a future date   Régie de l'énergie</a></p> <p>As previously mentioned, the Reliability Coordinator previously attempted to reach out to your team to obtain additional technical details regarding the facilities. To ensure an accurate understanding of the installations and their specifications, I would appreciate if you could share any relevant documentation (e.g., technical specifications, interconnection details) or direct us to the appropriate contact within your organization."</p> <p>As a result, based on the technical documentation provided, the facilities at Mount Copper and Mount Miller are comprised exclusively of Type 1 and Type 2 installations. Consequently, they do not meet the criteria for classification as Category 2 GO/GOP entities (<a href="#">2023_nerc_guide_inverter-based-resources.pdf</a>). Accordingly, these facilities (<b>Mount Copper</b> and <b>Mount Miller</b>) are not subject to the requirements of the present project and <b>will therefore be removed from the Registre</b> as part of this project.</p>
Les normes visées	Applicabilité, Disposition particulière	RTA comprend qu'il n'y a pas de changement aux normes, mais l'ajout des GO et GOP de catégorie 2, tel que déjà définit au Glossaire.	RTA	<p>Le Coordonnateur remercie l'entité pour sa participation à la consultation publique.</p> <p>Les cinq (5) normes de fiabilité visées (IRO-010-5, MOD-032-1, PRC-012-2, TOP-003-6.1, VAR-002-4.1) par le présent projet demeurent inchangées quant à leur contenu et à leur portée. Les modifications apportées concernent uniquement les dispositions particulières d'applicabilité au Québec, indiquées dans leurs annexes respectives et ont été ajustées afin d'y inclure explicitement les entités nouvellement enregistrées à titre de GO et de GOP de catégorie 2. Par conséquent, ces entités seront désormais assujetties à ces cinq normes et devront s'y conformer, au même titre que les autres entités déjà visées, sans qu'aucune modification ne soit apportée aux exigences techniques ou aux obligations fondamentales prévues par ces normes.</p>
Annexes QC	Applicabilité, Disposition particulière	RTA comprend que les changements aux annexes QC sont seulement pour précision et uniformisation du texte. Qu'il n'y a donc pas d'impact pour les entités par rapport à sa version précédente.	RTA	<p>Les annexes QC ont, en effet, été mises à jour à des fins de précision et uniformisation du texte mais principalement afin de répondre aux règles de procédure de la NERC par rapport à l'enregistrement des entités sous la catégorie 2 de GO et GOP. Les nouvelles versions des annexes QC de chacune des normes visées avaient pour objectif principal d'y indiquer une disposition particulière relative à l'applicabilité de celles-ci aux entités nouvellement inscrites au Registre sous la catégorie 2 de GO/GOP.</p> <p>Ainsi, les nouvelles versions des annexes QC des normes visées servent à préciser explicitement à ces entités que les exigences de ces normes leur sont désormais applicables.</p>

Toute la documentation	Date de mise en vigueur	<p><b>Commentaires préliminaires</b> à la consultation publique et pris en considération à l'ajustement des dates de mise en vigueur (échanges par courriel du Coordinateur de la fiabilité):</p> <p>"A July 1, 2025 effective date would be challenging due to the work required with reaching compliance with the identified standards. This includes:</p> <ol style="list-style-type: none"> <li>(1) Complete the IRO-010/TOP-003 gap assessment described above and close any identified gaps</li> <li>(2) Finalize VAR-002 documentation updates</li> <li>(3) Roll out any changes to affected stakeholders (control centre and site operations)</li> <li>(4) French language translation required to complete some of the analysis</li> </ol> <p>We are requesting an effective date no earlier than <b>October 1, 2026</b>.</p> <p>We will take this opportunity to provide a question:</p> <p>We are curious if Hydro Quebec was considering any updates to the published data specification (<a href="#">Transmission of information to those responsible for reliability</a>)? We note that specifications related to EOP-004 and EOP-011 are not applicable to Category 2 IBR but the data specification seems to imply that New Richmond would be expected to comply. Some of the ISOs/TOPs we worked with in for our other Category 2 IBR sites are updating their specification for this reason."</p>	TransAlta	<p>The Coordinator would like to thank the entity for its participation during the public consultation.</p> <p>"Based on the information provided and the discussions prior to the public consultation, we adjusted the implementation deadline to October 1, 2026 for the applicable entities.</p> <p>Regarding your question on the data specification, I will review internally and get back to you shortly with more details.</p> <p>In the meantime, if you need any clarification regarding the documentation or have additional questions, please do not hesitate to reach out."</p> <p>With respect to <b>EOP-004 (Event Reporting)</b>, this standard is intended for entities responsible for reporting BES disturbances, including TOPs, BAs, and GOPs associated with BES facilities. Its applicability is therefore tied to BES classification and registration. For Category 2 IBR facilities that are not BES-designated or do not carry registered GOP responsibilities for BES reliability, EOP-004 would generally not apply.</p> <p>Similarly, <b>EOP-011 (Emergency Operations)</b> focuses on emergency preparedness, including system restoration and operational coordination. Its requirements are directed toward entities with defined roles in maintaining BES reliability. As such, Category 2 IBR GO/GOP entities that are not BES-connected or do not have assigned reliability functions would typically fall outside the scope of EOP-011.</p> <p>The <b>Hydro-Québec "Specification for Data and Information" (2016)</b> document serves a different function, focusing on the transmission of operational and reliability-related data to support system operations. As shown in the referenced material, it explicitly ties data exchange requirements to standards such as TOP-003, IRO-010, MOD-032, and FAC-001. It does not always clearly distinguish between BES and non-BES applicability, which may lead to the interpretation that requirements extend to Category 2 IBR facilities even where certain EOP standards do not formally apply.</p> <p>EOP-004 and EOP-011 may not be applicable from a NERC compliance perspective for Category 2 IBR GO/GOPs, while Hydro-Québec's modelling and data submission requirements may still apply from an interconnection and operational standpoint. Clarification to interpret or update these requirements for Category 2 IBRs would be best confirmed directly with the appropriate teams, and you may wish to direct follow-up questions to <a href="mailto:CMEDonneespourlafiability@hydro.qc.ca">CMEDonneespourlafiability@hydro.qc.ca</a> (regarding IRO-010-4 and TOP-003-6.1) and <a href="mailto:TEdonneesdemodelisation@hydro.qc.ca">TEdonneesdemodelisation@hydro.qc.ca</a> (regarding MOD-032-1)</p>
IRO-010-5 MOD-032-1 PRC-012-2 TOP-003-6.1 VAR-002-4.1	Assessment of the impact proposed standards on targeted entities	Please find our completed impact assessment attached. Otherwise, we support the October 1, 2026, effective date for the 5 standards.	TransAlta	<p>The Coordinator would like to thank the entity for its participation during the public consultation.</p> <p>The implementation costs, the annual recurrent costs as well as their justification (as per the filled document "Assessment of the impacts of proposed standards on targeted entities") will be added to the Summary under <b>Section 4: Final Impact Assessment</b> and will be posted on the Reliability Coordinator website: <a href="#">Documentation – Reliability Coordinator   Hydro-Québec</a></p>