



**Stakeholder Comparison Comment Rationale Matrix**

**2010-07-15**

**AESO AUTHORITATIVE DOCUMENT PROCESS**

**Alberta Reliability Standard – PRC-007-AB-0 Assuring Consistency with Regional Underfrequency Load Shedding Program Requirements**

*NOTE: The AESO is asking market participants to give an initial indication of their support for, or opposition to, the specific Alberta Reliability Standard variances to the NERC requirements referenced below. Such an initial indication assists in the AESO's practical understanding of the receptivity of the industry to the proposed changes, and in that regard the AESO thanks, in advance, all market participants who choose to respond. With regard to the specific standard changes and their implications, such responses are without prejudice to the rights of market participants under the Act, any regulations, or related decisions of the Commission.*

Date of Request for Comment [yyyy/mm/dd]: 2010/07/15  
Period of Consultation [yyyy/mm/dd]: 2010/07/15 through 2010/08/15  
Comments From: Nexen Inc.  
Date [yyyy/mm/dd]: 2010/08/17

Contact: Jerry Mossing  
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*Listed below is the summary of changes for the proposed new, removed or amended sections of the standard. Please refer back to the Letter of Notice under the "Attachments to Letter of Notice" section to view the proposed content changes to the standard. Please double-click on the check box for either "Support" or "Oppose" and/or place your comments, reasons for position, and alternate proposals underneath (if any).*

**COMPARISON BETWEEN NERC PRC-007-0 AND ALBERTA PRC-007-AB-0  
ASSURING CONSISTENCY WITH REGIONAL UNDERFREQUENCY LOAD SHEDDING PROGRAM REQUIREMENTS**

NERC PRC-007-0	Alberta PRC-007-AB-0	AESO Reason for Difference	Stakeholder Comments	AESO Replies
<p><b>Purpose</b> Provide last resort System preservation measures by implementing an Under Frequency Load Shedding (UFLS) program.</p>	<p><b>Purpose</b> The purpose of this <b>reliability standard</b> is to provide last resort <b>system</b> preservation measures by implementing an <b>underfrequency load shedding</b> program.</p>	<p>Clarified the purpose to align with the content of the reliability standard.</p>		
<p><b>Applicability</b> 4.1. Transmission Owner required by its Regional Reliability Organization to own a UFLS program 4.2. Transmission Operator required by its Regional Reliability Organization to operate a UFLS program 4.3. Distribution Provider required by its Regional Reliability Organization to own or operate a UFLS program 4.4. Load-Serving Entity required by its Regional Reliability Organization to operate a UFLS program</p>	<p><b>Applicability</b> This <b>reliability standard</b> applies to:</p> <ul style="list-style-type: none"> <li>• The <b>legal owner</b> of a <b>transmission facility</b> that owns or operates relays as part of the <b>underfrequency load shedding</b> program as published on the AESO website.</li> <li>• A <b>market participant</b> that receives service under “Rate DTS” of the <b>ISO tariff</b> that has an obligation to shed load as part of the <b>underfrequency load shedding</b> program as published on the AESO website.</li> <li>• The <b>ISO</b>.</li> </ul>	<p><input type="checkbox"/> New <input checked="" type="checkbox"/> Amended <input type="checkbox"/> Deleted</p> <p>Amended to identify the responsible entities in Alberta.</p>	<p><input type="checkbox"/> Support <input type="checkbox"/> Support with language suggestions <input checked="" type="checkbox"/> Oppose</p> <p>Similar to comments made on other standards, Nexen is concerned with the confusion associated with the TFO functional entity definition. Under the current structure the term legal owner of a transmission facility does not exist. Also as Nexen previously noted (i.e. VAR-001) greater clarity and differentiation is required from a traditional TFO providing service over a large geographic area versus a market participant (i.e. GFO, or ISD) that owns a limited amount of transmission equipment solely for their interconnection. Nexen suggests that issues surrounding the TFO functional entity must be</p>	

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			<p>clarified prior to introducing any new standards utilizing the TFO designation.</p> <p>Nexen is also concerned that the proposed wording of “as published on the AESO website” creates uncertainty and ambiguity to the applicability and obligations market participants must comply with. To ensure all parties are aware of their compliance obligations the standards should provide as many specifics as possible (including document names and specific locations).</p> <p>Finally Nexen would request that if the AESO intends to reference a document / lists not outlined in the standard or utilizes terms which are crucial to the standard (i.e. “which affects the reliability of the AIES electric system or the bulk electric system” or critical infrastructure) that this information be must included in the stakeholder consultation process for that standard. Without all the important information available market participants cannot adequately evaluate the impact</p>	

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			that standard on their operations, nor does it lend itself to a full robust consultation which would be beneficial to the AESO and the industry.	
<b>Effective Date</b> April 1, 2005	<b>Effective Date</b> Ninety (90) <b>days</b> after the date of approval by the <b>Commission</b> .		<input type="checkbox"/> Support <input type="checkbox"/> Support with language suggestions <input type="checkbox"/> Oppose  <i>Insert comments, reason for position, and alternate proposal (if any).</i>	
<b>R1.</b> The Transmission Owner and Distribution Provider, with a UFLS program (as required by its Regional Reliability Organization) shall ensure that its program is consistent with its Regional Reliability Organization's UFLS program requirements.	<b>R1</b> The <b>ISO</b> must ensure its <b>underfrequency load shedding</b> program is consistent with the <b>underfrequency load shedding</b> program requirements of <b>WECC</b> .	<input type="checkbox"/> New <input checked="" type="checkbox"/> Amended <input type="checkbox"/> Deleted  Amended for clarity and consistency.  The Alberta Reliability Standards section of the AESO website, and in particular the section that contains this reliability standard, will contain reference to OPP 804 Off-Nominal Frequency Load Shedding and Restoration as a related authoritative document.	<input type="checkbox"/> Support <input type="checkbox"/> Support with language suggestions <input checked="" type="checkbox"/> Oppose  Similar to comments already provided, Nexen is concerned with the AESO's intention of referencing OPPs (i.e. OPP 804) and utilizing broad terms such as "authoritative documents" rather than outlining specifically the key requirements in the standard. This creates confusion, ambiguity and can create the situation where a market participant could be	

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			<p>found non-compliant with multiple authoritative documents which govern the same issue. Nexen submits the principles and goals as outlined in the AESO's TOAD project must also apply the AESO's reliability standards.</p>	
<p><b>R2.</b> The Transmission Owner, Transmission Operator, Distribution Provider, and Load-Serving Entity that owns or operates a UFLS program (as required by its Regional Reliability Organization) shall provide, and annually update, its underfrequency data as necessary for its Regional Reliability Organization to maintain and update a UFLS program database.</p>	<p><b>R2</b> Each <b>legal owner</b> of a <b>transmission facility</b> and each <b>market participant</b> receiving service under "Rate DTS" of the <b>ISO tariff</b> must annually update and provide to the <b>ISO</b> their <b>underfrequency</b> data.</p> <p><b>R3</b> The <b>ISO</b> must provide the <b>underfrequency</b> data it receives from <b>market participants</b> to <b>WECC</b> in accordance with <b>reliability standard MOD-010&amp;12-AB</b>.</p>	<p><input type="checkbox"/> New  <input checked="" type="checkbox"/> Amended  <input type="checkbox"/> Deleted</p> <p>Amended to identify the responsible entities in Alberta and for clarity and consistency.</p> <p>Split the requirement for legal owner of a transmission facility and market participants to provide data to the ISO and for the ISO to provide data to the WECC.</p>	<p><input type="checkbox"/> Support  <input type="checkbox"/> Support with language suggestions  <input checked="" type="checkbox"/> Oppose</p> <p>Similar to the comments provided in the applicability section above, there are a number of issues associated with the TFO functional entity definition which must be clarified prior to implementing additional standards that employ the TFO designation.</p> <p>The data reporting requirements also appear to rely on OPP 804 but that is not expressly stated. It also appears the expectations between OPP 804 and the original NERC standard do not match (i.e. OPP 804 is seeking more than the NERC standard). Can the AESO provide more clarity on why there</p>	

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			is variance from the NERC standard as it relates to data reporting and outline the rationale on why OPP 804 should continue to be in effect once the standard is approved.	
<p><b>R3.</b> The Transmission Owner and Distribution Provider that owns a UFLS program (as required by its Regional Reliability Organization) shall provide its documentation of that UFLS program to its Regional Reliability Organization on request (30 calendar days).</p>	<p><b>R4</b> The <b>ISO</b> must provide the <b>underfrequency load shedding</b> program required in requirement R1 to <b>WECC</b> within thirty (30) <b>days</b> of receiving <b>WECC's</b> written request.</p>	<p> <input type="checkbox"/> New  <input checked="" type="checkbox"/> Amended  <input type="checkbox"/> Deleted         </p> <p>Amended to identify the responsible entities in Alberta and for clarity and consistency.</p> <p>The Alberta Reliability Standards section of the AESO website, and in particular the section that contains this reliability standard, will contain reference to OPP 804 Off-Nominal Frequency Load Shedding and Restoration as a related authoritative document.</p>	<p> <input type="checkbox"/> Support  <input type="checkbox"/> Support with language suggestions  <input type="checkbox"/> Oppose         </p> <p><i>Insert comments, reason for position, and alternate proposal (if any).</i></p>	

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<p><b>M1.</b> Each Transmission Owner's and Distribution Provider's UFLS program shall be consistent with its associated Regional Reliability Organization's UFLS program requirements.</p>	<p><b>MR1</b> The <b>underfrequency load shedding</b> program is consistent with the <b>underfrequency load shedding</b> program requirements of <b>WECC</b>.</p>	<p><input type="checkbox"/> New  <input checked="" type="checkbox"/> Amended  <input type="checkbox"/> Deleted</p> <p>Measure amended to align with requirement R1.</p>	<p><input type="checkbox"/> Support  <input type="checkbox"/> Support with language suggestions  <input type="checkbox"/> Oppose</p> <p><i>Insert comments, reason for position, and alternate proposal (if any).</i></p>	
	<p><b>MR2</b> Evidence exists that each <b>legal owner</b> and <b>market participant</b> annually updated their <b>underfrequency</b> data and provided it to the <b>ISO</b> as specified in requirement R2.</p> <p><b>MR3</b> Evidence exists that the <b>ISO</b> provided the <b>underfrequency</b> data to <b>WECC</b> as specified in requirement R3.</p>	<p><input checked="" type="checkbox"/> New  <input type="checkbox"/> Amended  <input type="checkbox"/> Deleted</p> <p>Measure added to align with requirement R2 and R3.</p>	<p><input type="checkbox"/> Support  <input type="checkbox"/> Support with language suggestions  <input type="checkbox"/> Oppose</p> <p><i>Insert comments, reason for position, and alternate proposal (if any).</i></p>	
<p><b>M2.</b> Each Transmission Owner, Transmission Operator, Distribution Provider, and Load-Serving Entity that owns or operates a UFLS program shall have evidence that it provided its associated Regional Reliability Organization and NERC with documentation of the UFLS program on request (30 calendar days).</p>	<p><b>MR4</b> Evidence exists that the <b>ISO</b> provided the <b>underfrequency load shedding</b> program to <b>WECC</b> as specified in requirement R4.</p>	<p><input type="checkbox"/> New  <input checked="" type="checkbox"/> Amended  <input type="checkbox"/> Deleted</p> <p>Measure amended to align with requirement R4.</p>	<p><input type="checkbox"/> Support  <input type="checkbox"/> Support with language suggestions  <input type="checkbox"/> Oppose</p> <p><i>Insert comments, reason for position, and alternate proposal (if any).</i></p>	

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<b>Compliance</b> To view the compliance section D of the NERC reliability standard follow this link: <a href="http://www.nerc.com/files/PRC-007-0.pdf">http://www.nerc.com/files/PRC-007-0.pdf</a>		The Alberta reliability standards do not contain a compliance section. Compliance with all Alberta reliability standards is completed in accordance with the Alberta Reliability Standards Compliance Monitoring Program, available on the AESO website at: <a href="http://www.aeso.ca/loadsettlement/17189.html">http://www.aeso.ca/loadsettlement/17189.html</a> .		
<b>Regional Differences</b> None identified.	None identified.	Not applicable in Alberta		

<b>Definitions</b>	<b>Comments</b>	<b>Rationale and/or Alternate Proposal</b>
<b>(a) New</b> NA		
<b>(b) Removals</b> N/A		
<b>(c) Amendments</b> N/A		