



Stakeholder Comparison Comment Rationale Matrix

2010-07-08

AESO AUTHORITATIVE DOCUMENT PROCESS

Alberta Reliability Standard – MOD-010&012-AB-0 Steady-State and Dynamic Data for Transmission System Modeling and Simulation

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]: 2010/07/08
Period of Consultation [yyyy/mm/dd]: 2010/07/08 through 2010/08/08
Comments From: TransAlta
Date [yyyy/mm/dd]: 2010/08/10

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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 RELIABILITY STANDARDS (MOD-010-0 AND MOD-012-0) AND MOD-010&012-AB-0
STEADY-STATE AND DYNAMIC DATA FOR TRANSMISSION SYSTEM MODELING AND SIMULATION**

NERC MOD-010-0 & MOD-012-0	Alberta MOD-010&012-AB-0	AESO Reason for Difference	Stakeholder Comments	AESO Replies
<p>Purpose To establish consistent data requirements, reporting procedures, and system models to be used in the analysis of the reliability of the Interconnected Transmission Systems.</p>	<p>Purpose The purpose of this reliability standard is to provide for the delivery of data and information necessary to establish consistent power flow and dynamic models to be used in the analysis of the reliability of the Interconnection.</p>	<p>Clarified the purpose to align with the content of the reliability standard.</p>		
<p>Applicability MOD-010 4.1. Transmission Owners specified in the data requirements and reporting procedures of MOD-011-0_R1 MOD-010 4.2. Transmission Planners specified in the data requirements and reporting procedures of MOD-011-0_R1 MOD-010 4.3. Generator Owners specified in the data requirements and reporting procedures of MOD-011-0_R1 MOD-010 4.4. Resource Planners specified in the data requirements and reporting procedures of MOD-011-0_R1 MOD-012 4.1. Transmission Owners specified in the data requirements and reporting procedures of MOD-013-0_R1 MOD-012 4.2. Transmission Planners specified in the data requirements and reporting procedures of MOD-013-0_R1 MOD-012 4.3. Generator Owners specified in the data requirements and reporting procedures of MOD-013-0_R1 MOD-012 4.4. Resource Planners specified in the data requirements and</p>	<p>Applicability This reliability standard applies to:</p> <ul style="list-style-type: none"> • GFOs • TFOs • ISO 	<p><input checked="" type="checkbox"/> New <input type="checkbox"/> Amended <input type="checkbox"/> Deleted</p> <p>To identify the responsible entities in Alberta.</p> <p>Alberta Variance: As a result of the similarity and commonality of the subject matter requirements and measures of NERC standards MOD-010-0 and MOD-012-0 they have been combined into one Alberta reliability standard MOD-010&012-AB-0.</p>	<p><input type="checkbox"/> Support <input type="checkbox"/> Support with language suggestions <input checked="" type="checkbox"/> Oppose</p> <p>TransAlta requests that the AESO shall allow for the exemption of certain generation units greater than 5 MVA and less than 10 MVA from this standard due to age and minimal impact to the BES. The standard should allow AESO the discretion to retain a list of the above generation units which can be exempt. Entities which feel they are eligible for an exemption can apply to the AESO to discuss applicability</p>	

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reporting procedures of MOD-013-0_R1				
<p>Effective Date April 1, 2005</p>	<p>Effective Date One hundred and eighty (180) days after the date of approval by the Commission.</p>	<p>To allow a reasonable amount of time for Alberta entities to implement this Alberta Reliability Standard.</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>MOD-010 R1. The Transmission Owners, Transmission Planners Generator Owners, and Resource Planners (specified in the data requirements and reporting procedures of MOD-011-0_R1) shall provide appropriate equipment characteristics, system data, and existing and future Interchange Schedules in compliance with its respective Interconnection Regional steady-state modeling and simulation data requirements and reporting procedures as defined in Reliability Standard MOD-011 0_R1.</p> <p>MOD-012 R1. The Transmission Owners, Transmission Planners, Generator Owners, and Resource Planners (specified in the data requirements and reporting procedures of MOD-013-0_R1) shall provide appropriate equipment characteristics</p>	<p>R1. Each TFO and GFO must provide equipment characteristics and system data to the ISO.</p>	<p><input type="checkbox"/> New <input checked="" type="checkbox"/> Amended <input type="checkbox"/> Deleted</p> <p>OPP 1306 Reporting Equipment Changes outlines the equipment characteristics and system data that must be provided in requirement R1.</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 1306 as a related authoritative document. This reference will inform applicable entities of the requirements for the provision of equipment characteristics and system data in both this reliability standard and OPP 1306.</p>	<p><input type="checkbox"/> Support <input checked="" type="checkbox"/> Support with language suggestions <input type="checkbox"/> Oppose</p> <p>The requirement as written does not specifically list what equipment characteristics and system data the TFO and GFO must provide. Without a specific list the entity can not ensure compliance. The NERC version of this standard refers to MOD – 011 where these specifics are provided. The AESO has removed this reference and appears to refer to OPP1306 as the source for a list, however this reference is only given in the “AESO Reason for Different” which will not form part of the standard. For this reason, the requirement as drafted does not</p>	

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<p>and system data in compliance with the respective Interconnection-wide Regional dynamics system modeling and simulation data requirements and reporting procedures as defined in Reliability Standard MOD-013-0_R1.</p>			<p>provide any detail as to what is specifically required.</p> <p>If the AESO's intent is to rely on OPP 1306 for the list, OPP 1306 table 1 is too broad a list and TransAlta believes covers more than what should be required for this standard. Instead, we feel that a list should be developed specifically for MOD 010-012 should be embedded into this standard. Please note that there could be a risk of double jeopardy if OPP 1306 is embedded into this standard so we would like to ensure that this list is embedded right into the standard and does not reference an OPP.</p> <p>We also would like to suggest that the standard allow an entity up to 180 days after the date of request from the AESO to provide the requested information . The suggested wording is below.</p> <p>R1. Each TFO and GFO must provide any changes to equipment characteristics and system data to the ISO <u>by no later than 180 days after the date of the request from</u></p>	

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			<p><i>the AESO.</i></p> <p>If the AESO were to adopt this language, TransAlta would be willing to accept a shorter period for an effective date.</p>	
	<p>R2. The ISO, subject to requirement R3, must provide equipment characteristics, system data, dynamics system modeling, simulation data and existing and future interchange schedules to the WECC in compliance with the respective Interconnection-wide WECC steady-state and dynamics system modeling and simulation data requirements and reporting procedures.</p>	<p><input checked="" type="checkbox"/> New <input type="checkbox"/> Amended <input type="checkbox"/> Deleted</p> <p>Added to identify requirements of the responsible entities in Alberta.</p> <p>The requirements for an “Area Coordinator” in the “WECC Data Preparation Manual For Power Flow and Stability Studies” are the current WECC requirements and reporting procedures as referred to in requirement R2.</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 the appropriate WECC requirements and reporting procedures as referred to in requirement R2.</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>MOD-010 R2. The Transmission Owners, Transmission Planners, Generator Owners, and Resource Planners (specified in the data requirements and reporting procedures of MOD-011-0_R1) shall provide this steady-state modeling and simulation data to the Regional Reliability Organizations, NERC, and those entities specified within Reliability Standard MOD-011-0_R1. If no schedule exists, then these entities shall provide the data on request (30 calendar days).</p> <p>MOD-012 R2. The Transmission Owners, Transmission Planners, Generator Owners, and Resource Planners (specified in the data requirements and reporting procedures of MOD-013-0_R1) shall provide dynamics system modeling and simulation data to its Regional Reliability Organization(s), NERC, and those entities specified within the applicable reporting procedures identified in Reliability Standard MOD-013-0_R1. If no schedule exists, then these entities shall provide data on request (30 calendar days).</p>	<p>R3. The ISO must provide the data and information specified in requirement R2 according to the data bank compilation schedule published by the WECC; provided that if no such schedule exists, then such data and information must be provided no later than thirty (30) days from the date it is requested by the WECC.</p>	<p><input type="checkbox"/> New <input checked="" type="checkbox"/> Amended <input type="checkbox"/> Deleted</p> <p>Amended for clarity and consistency.</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>MR1. Confirmation exists that data and information has been provided as specified in requirement R1.</p>	<p><input checked="" type="checkbox"/> New <input type="checkbox"/> Amended <input type="checkbox"/> Deleted</p> <p>Alberta measure added to align with requirement R1.</p>	<p><input type="checkbox"/> Support <input type="checkbox"/> Support with language suggestions <input checked="" type="checkbox"/> Oppose</p> <p>TransAlta believes MR1 should be reworded as:</p> <p>MR1. <u>Evidence</u> exists that data and information has been provided <u>upon request from the AESO</u> as specified in requirement R1.</p> <p>We feel that a confirmation by the AESO should be available to be used as a tool if an entity is seeking to confirm their compliance, however a confirmation should not be a requirement if the entity has proper evidence to demonstrate compliance. An entity should be entitled to choose what they want to be provided as evidence to demonstrate their compliance.</p>	
	<p>MR2. Confirmation exists that data and information has been provided as specified in requirement R2.</p>	<p><input checked="" type="checkbox"/> New <input type="checkbox"/> Amended <input type="checkbox"/> Deleted</p>	<p><input type="checkbox"/> Support <input type="checkbox"/> Support with language suggestions <input type="checkbox"/> Oppose</p>	

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		Alberta measure added to align with requirement R2.	<i>Insert comments, reason for position, and alternate proposal (if any).</i>	
<p>MOD-010 M1. The Transmission Owner, Transmission Planner, Generator Owner, and Resource Planner, (specified in the data requirements and reporting procedures of MOD-011-0_R1) shall have evidence that it provided equipment characteristics, system data, and Interchange Schedules for steady-state modeling and simulation to the Regional Reliability Organizations and NERC as specified in Standard MOD-010-0_R1 and MOD-010-0_R2.</p> <p>MOD-012 M1. The Transmission Owners, Transmission Planners, Generator Owners, and Resource Planners (specified in the data requirements and reporting procedures of MOD-013-0_R1) shall each have evidence that it provided equipment characteristics and system data for dynamics system modeling and simulation in accordance with Reliability Standard MOD-012-0_R1 and Reliability Standard MOD-012-0_R2.</p>	<p>MR3 Confirmation exists that the data has been provided in accordance with the timelines specified in requirement R3.</p>	<p><input type="checkbox"/> New <input checked="" type="checkbox"/> Amended <input type="checkbox"/> Deleted</p> <p>Alberta measure amended to align with requirement 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>	

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Compliance To view the compliance section D of the NERC reliability standards follow these links: http://www.nerc.com/files/MOD-010-0.pdf http://www.nerc.com/files/MOD-012-0.pdf		There is no compliance section proposed in the Alberta Reliability Standards. Compliance with all Alberta Reliability Standards is completed by the ISO in accordance with ISO Rule 12 ISO Compliance Monitoring.		
Regional Differences None identified.		Not applicable in Alberta		

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



Existing Defined Terms Used in this Standard:

(As included in the Consolidated Authoritative Document Glossary)

- Commission
- day
- generating facility owner (GFO)
- interchange schedule
- Interconnection
- ISO
- reliability
- reliability standard
- transmission facility owner (TFO)
- Western Electric Coordinating Council (WECC)

General comments.

The text in the draft standard does not show defined terms in bold and this makes it somewhat difficult to fully interpret the intention of the AESO in using particular language.