

Stakeholder Comment and Replies Matrix

AESO AUTHORITATIVE DOCUMENT PROCESS

Proposed Alberta Reliability Standard EOP-001-AB-1 *Emergency Operations Planning* (“EOP-001-AB-1”)



Date of Request for Comment: September 9, 2009
Stakeholder Consultation Period: September 9 – October 9, 2009

Stakeholder	Stakeholder Comment	AESO Reply
IPPSA	<ol style="list-style-type: none"> 1. R2 The ISO should develop plans to mitigate operating emergencies arising from insufficient generation capacity in conjunction with affected parties. In particular any plans for conscription or restriction of generation should be developed in consultation with affected parties. Affected parties should be informed of the ISO’s plans to mitigate operating emergencies arising from insufficient generation capacity. 2. IPPSA assumes that the AESO has sufficient plans to mitigate operating emergencies (OPP 801, 750, 606, Rule 9.4, etc.) and is not contemplating any additional plans affecting generators. Is this assumption correct? 3. R3 The ISO should develop plans to meet ISO transmission reliability operating criteria and mitigate operating emergencies on the transmission system in conjunction with affected parties. In particular, any plans for restricted operation of generation or load should be developed in consultation with affected parties. Affected parties should be informed of the ISO’s plans to meet ISO transmission reliability operating criteria and mitigate operating emergencies on the transmission system. 4. R5. As written the ISO and the TFO’s must each develop, maintain, and implement a set of plans for load shedding. However, there is no 	<ol style="list-style-type: none"> 1. The AESO has and will continue to follow the AESO stakeholder consultation process in the development of authoritative documents for the mitigation of operating emergencies arising from insufficient generation capacity and the conscription or restriction of generation with affected parties. The AESO has and will continue to communicate its plans to mitigate operating emergencies arising from insufficient generation capacity. 2. Any plans to mitigate operating emergencies will be developed as required for reliability purposes. These plans must adhere to the requirements of related AESO authoritative documents. Any amendments to AESO authoritative documents will follow the AESO stakeholder consultation process. 3. The AESO has and will continue to follow the AESO stakeholder consultation process in the development of authoritative documents for conscription or restriction of generation or load with affected parties. The AESO has and will continue to communicate its plans to meet AESO transmission reliability operating criteria and mitigate operating emergencies on the transmission system with affected parties. 4. Previous proposed EOP-001-AB-1 (now proposed EOP-001-AB-2) is an overarching standard for the EOP set of

	<p>requirement for coordination of these plans. It is suggested that the ISO should have the responsibility to coordinate the TFO's plans for load shedding and to ensure that load shedding plans and practices among TFO's are consistent with each other.</p> <p>5. M5. The measure should be that plans exist at both the ISO and the TFO's for implementing a set of plans for load shedding.</p> <p>6. R6. As written the ISO and the TFO's must each develop, maintain, and implement a set of plans for system restoration. However, there is no requirement for coordination of these plans. The ISO should have the responsibility to coordinate the TFO's plans for system restoration.</p> <p>7. R7.3 This requirement obligates the ISO to coordinate with adjacent markets, yet it does not describe who is ultimately responsible for the plan. We believe the AESO should be ultimately responsible for coordinating actions among the parties when contingencies occur within Alberta's market.</p> <p>8. M7. The measure should be that a coordination plan is in place at the ISO and TFO's.</p> <p>9. R9 and R10. The AESO should have the responsibility to gather and coordinate system restoration plans with TFO's and of communicating plans these to all TFO's, VRC and other external parties as required.</p>	<p>standards. More detailed requirements are included in the other EOP standards. Existing EOP-003-AB-1 <i>Load Shedding Plans</i> addresses coordination of load shed plans.</p> <p>5. The AESO agrees with IPPSA, however the market participants to which a requirement, and its corresponding measure, applies is identified in the requirement.</p> <p>6. The AESO agrees with IPPSA that it should coordinate the transmission facility owner's plans for system restoration. However, proposed EOP-001-AB-2 no longer includes a requirement specific to plans for system restoration. EOP-005-AB-2 <i>System Restoration Plans</i> will address coordination of system restoration plans.</p> <p>7. The AESO disagrees with IPPSA that previous requirement R7.3 (now requirement R5), obligates the AESO to coordinate with adjacent "markets". Requirement R5 does however obligate the AESO and each operator of a transmission facility to include in its plans the tasks to be coordinated with and among any affected operator of a transmission facility, interconnected transmission operator and adjacent balancing authority, as appropriate.</p> <p>8. The AESO agrees with IPPSA. Measure MR5 in proposed EOP-001-AB-2 has been amended to identify that emergency plans exist and contain items listed in requirement R5.</p> <p>9. The AESO agrees with IPPSA that it should have the responsibility to gather and coordinate system restoration plans with transmission facility owners and of communicating plans these to all transmission facility owners, Vancouver Reliability Coordinator and other external parties as required. However, proposed EOP-001-AB-2 no longer includes a requirement specific to plans for system restoration. EOP-005-AB-2 will address</p>
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		<p>coordination of system restoration plans.</p>
<p>Capital Power</p>	<ol style="list-style-type: none"> 1. The AESO has already developed authoritative documents to mitigate operating emergencies (i.e. OPP 801). Capital Power recommends that the AESO provide a reference table located on its website that indicates which of the current authoritative documents satisfy the AESO's obligation to implement emergency operations planning. 2. It is important for market participants to understand how all of the AESO authoritative documents relate to one another so that compliance can be achieved. Capital Power suggests that all authoritative documents are drafted such that the duplication of requirements and the risk of contravention of multiple rules from a single infraction can be avoided. 3. EOP-001-AB-1 requires that the ISO and the TFOs must develop, maintain, and implement a set of plans for system restoration. Capital Power understands that EOP-003-AB-1 also contains requirements for TFOs with respect to load shedding and therefore Capital Power recommends that the AESO also indicate this in a reference table located on the website. 	<ol style="list-style-type: none"> 1. Where there are linkages between reliability standards and other: <ul style="list-style-type: none"> • reliability standards; • authoritative; and • non-authoritative documents, <p>reference will be made to those documents on the AESO website to inform applicable entities of the existence of related requirements and information.</p> 2. Please see AESO Reply 1 above. The AESO confirms that reliability standards will continue to be recommended to the Commission following broad industry consultation with affected stakeholders, while ISO rules, including ISO OPPs, will continue to be created, amended, consulted on and filed with the Commission in a manner that reduces duplication and overlaps between reliability standards and ISO rules (ISO tariff?). <p>For clarity, Alberta reliability standards will continue to be represented as a separate authoritative domain from ISO rules and will continue to be drafted in a manner that, as determined to be applicable and practicable for implementation in Alberta, retains the format and wording as approved by the NERC Board of Trustees. As a result, there may be some occasions where the AESO determines that it is reasonable and necessary that duplication or overlap occur.</p> 3. Proposed EOP-001-AB-2 no longer includes a requirement specific to plans for system restoration. EOP-005-AB-2 will address coordination of system restoration plans. As well, existing EOP-003-AB-1 contains additional requirements with respect to load shedding. <p>Please also see AESO Reply 1 above.</p>

