

Stakeholder Comment & AESO Reply Matrix

Alberta Reliability Standards

Date: November 20, 2009

Date of Request for Comment: Aug 13, 2009
 Stakeholder Consultation Period: Aug 13 – Sep 14, 2009

1.1 – PRC-004-AB-1		
Stakeholder	Stakeholder Comment	AESO Response
<u>TransAlta</u>	<p>1. The standard shows Applicability to the GFOs. The NERC version of the standard shows applicability to just Generator Owners. TransAlta requests clarification from the AESO as to how they are assigning responsibility to this standard, as well as many others. TransAlta's recent understanding is that the GFO standards will, from this point forward, cover the Generator Owner requirements only and that the Generator Operator requirements would be solely assigned to the GOP classification. We believe this provides more clarity in the case where the owner and the operator of a generating plant are different.</p> <p>2. R1 It would be useful to reference the Alberta documents that will be used to manage analysis of protection system misoperations. The Reasons for Difference state that Alberta will use existing OPPs and PRC-004-WECC-1. It would be useful to include these references right in the requirement.</p> <p>R2 It would be useful to reference the Alberta documents that will be used to manage analysis of protection system misoperations. The Reasons for Difference state that Alberta will use existing OPPs and PRC-004-WECC-1. It would be useful to include these references right in the requirement.</p>	<p>1. The AESO assigns applicability on a requirements basis based on advice from the ARC work group assigned to review the standard. This makes it possible for a standard to contain requirements that are applicable to generator operators and Generation Facility Owners; however no requirement is assigned to both generator operator and GFO. Requirements applicable to generator operator generally relate to real time and near real time operation of generating facilities with GFO applicability relating to technical matters often involving equipment.</p> <p>2. The AESO is developing a reference table of reliability standard requirements that will provide a reference to other ISO rules, reliability standards or Information Documents. In the case of this particular reliability standard, OPP 1304 System Event Monitoring and Disturbance Reporting is the primary ISO rule relating to the standard. PRC-004-WECC-1 has additional requirements if the mis-operations occur on a WECC major transmission path and related equipment.</p>
<u>IPPSA</u>	<p>1. This standard and PRC-004-WECC-AB-1 have overlapping purposes. The difference in the purpose between the two standards</p>	<p>1. The AESO agrees that the purposes of PRC-004-AB-1 and PRC-004-WECC-AB-1 overlap. This is in</p>

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	<p>should be clearly articulated.</p> <p>2. The acronym GOP is undefined and is not defined in Part 1 of the ISO Rules.</p>	<p>line with the NERC and WECC standards. The differences are in the Applicability of each standard. The NERC version has a broader applicability while the WECC version is specific to certain entities.</p> <p>2. Through the Transition of Authoritative Documents (TOAD) project, the AESO proposes to rationalize various terms used for "generator operator" and "generator owner" in ISO rules and Alberta Reliability Standards. This rationalization, which will include establishing definitions, will follow the ISO rules process. We anticipate proceeding with this initiative in the near future. Therefore the acronym GOP will not be defined separately through the Alberta Reliability Standards project.</p>
<u>ATCO Power</u>	<p>It is not clear how deep into the generation protection this applies. As per PRC-005-AB-1 this should explicitly exclude the prime mover and associated control systems.</p>	<p>The AESO agrees and will add the following to R1: "For GFO's, protection systems that directly affect the reliability of the BES include all those that measure voltage, current, or frequency from the generating unit to the AIES but excludes the prime mover and associated control systems."</p>