

Stakeholder Comment & AESO Replies Matrix

Alberta Reliability Standards

Date: November 20, 2009

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

1.3 – PRC-004-WECC-AB-1		
Stakeholder	Stakeholder Comment	AESO Response
<p><u>Name</u> Capital Power Corporation</p>	<p>1. Capital Power would like the AESO to extend the time allowed for the investigation and repair (or replacement) of equipment where misoperations have occurred. The proposed time frame is not practical. When a misoperation occurs at a facility initial efforts target getting the generating unit back on line. Once the generating unit is back in service an investigation will then be initiated.</p> <p>2. Under R1.1 the GOP is required to identify apparent misoperations within twenty four hours and R2.2.2 requires that any protection system or RAS that misoperated be repaired within 20 business days. Capital Power suggests that ten days is more reasonable for the identification of misoperations and that 30 days be allowed for replacement and/or repair. Furthermore we would like the AESO to explicitly acknowledge that manual systems designed to replace automated systems may be initiated within 30 days but that there is a possibility that the complete replacement or repair of the automated system may not be achieved within this 30 day time frame.</p>	<p>1. The AESO proposes that PRC-004-WECC-1 timelines remain unchanged. All other WECC members have committed to meet the timelines of this standard and the AESO believes extending the timeline would be a detriment to reliability in Alberta. The AESO notes that this standard is a replacement for a standard in the current WECC RMS Agreement (http://www.auc.ab.ca/applications/orders/utility-orders/Utility%20Orders/2005/U2005-372.pdf).</p> <p>2. The time allowed to identify apparent mis-operations is part of the AESO WECC RMS agreement which is currently in place in Alberta; therefore we do not propose to change the time frame.</p>
<p><u>Name</u> TransAlta</p>	<p>1. The standard shows Applicability to both GFOs and GOPs. 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</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</p>

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	<p>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. If this change is not made, and the GFO includes both the Generator Owner and Generator Operator standards, and a standard is assigned to both a GFO and a GOP then the division of requirements between the owner and the operator of the asset will be difficult to determine. We would recommend that this standard just be applicable to the GFOs as Generator Owners. If the Applicability is with the GFO only but there is another party operating their particular RAS, the GFO (owner) will be responsible to put in place the necessary agreements between themselves and the operator of that facility.</p> <p>2. R2.3.2.1, R2.3.2.2 both state “If the responsible entity is. . .” It is not clear what the statement “If the responsible entity is” means. How would one determine this?</p>	<p>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 “responsible entity” is the owner of the equipment.</p>
<p><u>Name</u> IPPSA</p>	<p>1. This standard, PRC-016-AB-0 and PRC-004-AB-1 have overlapping purposes. The difference in the purpose between the standards should be clearly articulated</p> <p>2. Reporting requirements and timelines for reporting or exchanging information specified in this standard, PRC-016-AB-0 and PRC-001-AB-1 should be harmonized wherever possible.</p> <p>3. The acronym GOP is undefined and is not defined in Part 1 of the ISO Rules.</p>	<p>1. The AESO agrees that the purposes of PRC-004-AB-1 and PRC-004-WECC-AB-1 overlap. The differences are in the Applicability of each standard.</p> <p>2. The AESO agrees. However, the reports specified in PRC-001-AB-0, PRC-004-WECC-AB-1 and PRC-016-AB-0 are different in scope and accordingly harmonizing the requirements and timelines would not work in this instance.</p> <p>3. 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 will be carried out through the ISO rules process. We anticipate proceeding with this initiative in the near future.</p>

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	<p>4. The ISO should take a more active role than the proposed standard specifies in the analysis and corrective action taken for misoperations of RAS schemes on specified transmission paths. RAS schemes are generally designed by the ISO and may include equipment installed at facilities owned by different entities. RAS may operate correctly (in terms of signals received and actions taken) but at the same time operate in an unintended manner. The intent of the RAS is best known by the ISO. Operations of RAS should be reviewed by the ISO to ensure they operated as intended.</p> <p>5. RAS that are no longer needed but remain in service could adversely affect reliability and unnecessarily curtail economic dispatches in the market. The ISO should undertake an annual review of the continued need for installed RAS and remove those that are no longer needed.</p> <p>6. It should be made clear that the requirements of this standard apply to protection schemes and RAS on specified transmission paths only.</p> <p>7. Whenever there is an operation of a RAS that is associated with a specified transmission path, the requirements for analysis for misoperation or unintended operation and responsibility to initiate corrective action should extend to the ISO as well as the relevant TFO and GFO. This requirement for the ISO to review RAS operations and initiate corrective action should be incorporated in R1, R1.1, R1.2 and R2 of this standard.</p>	<p>Therefore the acronym GOP will not be defined separately through the Alberta Reliability Standards project.</p> <p>4. The Alberta Reliability Standards identify minimum requirements. The AESO is, and will continue to be, involved in RAS actions under OPP 1304.</p> <p>5. The AESO agrees that RASs that are no longer needed but remain in service could adversely affect reliability and market operation. In carrying out its duties to plan a reliable system the AESO undertakes system performance assessments and studies to identify system operating limits. RASs are reviewed during the course of these studies and assessments.</p> <p>6. This Alberta Reliability Standard is based on the PRC-004-WECC-1 standard and as such applicability to certain transmission paths is referenced on the WECC website. In order to maintain an updated Alberta Reliability Standard the AESO's view is that it is appropriate to refer to the WECC lists of transmission paths.</p> <p>7. The Alberta Reliability Standards identify minimum requirements. The AESO is and will continue to be involved in RAS actions under OPP 1304.</p> <p>8. This proposed Alberta Reliability Standard is based on a WECC standard, not a NERC standard. FEPS and FERAS are terms proposed to be included in the Alberta Reliability Standards Glossary of Terms.</p>
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	8. FEPS and FERAS are defined in the NERC standard but not in the ISO's proposed standard.	
Name ATCO Power	This appears to overlap with PRC-004-AB-1.	The AESO agrees that the purposes of PRC-004-AB-1 and PRC-004-WECC-AB-1 are the same. This is in line with the NERC and WECC standards. The difference between the PRC-004-AB-1 and PRC-004-WECC-AB-1 Alberta Reliability Standard is the difference in the Applicability of each standard.