



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]: <u>2010/07/08</u> Period of Consultation [yyyy/mm/dd]: <u>2010/07/08</u> through <u>2010/08/08</u> Comments From: <u>Capital Power Corporation</u> Date [yyyy/mm/dd]: <u>2010/08/10</u>	Contact: <u>Jerry Mossing</u> Phone: <u>403-539-2496</u> E-mail: <u>Ars_comments@aeso.ca</u>
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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 type="checkbox"/> Oppose</p> <p><i>Insert comments, reason for position, and alternate proposal (if any).</i></p>	

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reporting procedures of MOD-013-0_R1				
Effective Date April 1, 2005	Effective Date One hundred and eighty (180) days after the date of approval by the Commission.	To allow a reasonable amount of time for Alberta entities to implement this Alberta Reliability Standard.	<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>	
<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>	<input type="checkbox"/> New <input checked="" type="checkbox"/> Amended <input type="checkbox"/> Deleted OPP 1306 Reporting Equipment Changes outlines the equipment characteristics and system data that must be provided in requirement R1. 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.	<input type="checkbox"/> Support <input type="checkbox"/> Support with language suggestions <input checked="" type="checkbox"/> Oppose <i>Insert comments, reason for position, and alternate proposal (if any).</i> Capital Power does not support this standard as written due to the duplication of requirements that is created by a reference to OPP 1306. We have consistently stated that Market Participants should not be at risk of being found non-compliant with multiple authoritative documents for a single action or inaction. Capital Power is supportive of the AESO's Transition of Authoritative	

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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>Document (TOAD) objectives. One of the objectives of the AESO's TOAD project was to eliminate overlap among authoritative documents and create market participant requirements and obligations that provide clarity, transparency and certainty to market participants.</p> <p>Capital Power has committed resources to participate in the Operations Working Group to identify such issues early in the drafting process. When this standard was discussed at the working group prior to public consultation, these issues were raised by Capital Power and other participants. We have also provided comments on this issue in consultation on CIP-001 and OPP 808, and VAR-002-WECC-AB-1, VAR-501-WECC-AB-1 and OPP 1305.</p> <p>A culture of compliance is necessary to ensure the reliable operation of the system. If a standard does not clearly outline the compliance obligations market participants may not be able to</p>	

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			<p>ensure compliance. The fact that this standard as written necessitates a reference to OPP 1306 in order to make the compliance obligations clear indicates that it is technically deficient.</p> <p>In principle, we do not support the reference of AESO Rules or OPPs in Alberta Reliability Standards. Since it is possible to deviate from the NERC version of the standards where justified, we suggest two alternate solutions to avoid the duplication of requirements across multiple authoritative documents:</p> <ul style="list-style-type: none"> • Section 4.1 of OPP 1306 which details the obligations of facility owners to report equipment and facility changes to the AESO could be moved into this standard as bullet points of R1 and subsequently removed from OPP 1306. • Alternatively, the AESO could remove R1 from this standard and indicate that the requirement is already 	

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			<p>contained in an existing OPP. In this case, OPP 1306 would remain in place.</p> <p>To the extent the AESO would like to utilize a reference table to direct market participants to supporting information documents or authoritative documents covering related subject matter, provided that the reference is not included in the standard itself, we are supportive of the AESO providing more clarity to better enable compliance. In this instance the AESO may wish to create an Information Document with OPP 1306's Figure 1 Equipment Change Control Form.</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</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</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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	procedures.	<p>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>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</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>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>				

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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><i>Insert comments, reason for position, and alternate proposal (if any).</i></p> <p>Capital Power does not support MR1 as currently written.</p> <p>MR1 states that in order to demonstrate compliance a “Confirmation exists that data and information has been provided as specified in requirement R1”. It is unreasonable and inappropriate to make market participants responsible for the actions of another party, in this case the AESO. It is not appropriate to place an obligation on a market participant that would put it at risk of being found non-compliant if the AESO does not provide a requested confirmation. Particularly where the standard does not explicitly require that the AESO provide the confirmation. The NERC version of the standard only requires the generator owner</p>	

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			<p>to provide evidence that the information was submitted. This is all that a market participant can reasonably be responsible for.</p> <p>Capital Power has committed resources to participate in the Operations Working Group to identify such issues early in the drafting process. When this standard was discussed at the working group prior to public consultation, these issues were raised by Capital Power and other participants. We have also provided comments on this issue in consultation on VAR-002-AB-1.</p> <p>Furthermore, after review of the Alberta Reliability Standards Compliance Frequently Asked Questions pertaining to obtaining a Confirmation from the AESO, we are increasingly concerned. The answer to Question 6 states that:</p> <p><i>“A registered entity that is unsuccessful in obtaining a confirmation letter must provide a) written evidence (e.g. emails and replies) that they have made a reasonable request for a</i></p>	

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			<p><i>confirmation letter, b) written evidence that they have escalated the request at least once, and c) any correspondence from the request, and d) the contact information (e.g. name, email, organization, phone number) of the person/party that has not responded. The registered entity will not be out of compliance to the standard if reasonable actions have been made to get a confirmation letter.”</i></p> <p>As stated in the Purpose section of this standard, the intent is to ensure market participants provide the AESO with up to date information on their respective facilities. The intent is not to initiate a potentially lengthy and administratively burdensome process of obtaining a confirmation for which the purpose is unclear and is ultimately not required.</p> <p>The FAQ significantly increases the obligation of market participants to maintain documentation as market participants must satisfy a, b, c</p>	

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			<p><i>and d</i> to demonstrate reasonable actions to avoid non-compliance.</p> <p>Furthermore, the FAQ states that market participants don't necessarily need a confirmation, and instead just need to prove that they made a concerted effort to obtain one. Therefore, it appears that this process serves no purpose other than to increase the obligation and risk of non-compliance on market participants and we do not see the necessity of the confirmation at all.</p> <p>If a market participant can provide evidence that they have submitted the information required and the standard clearly states the AESO's data requirements, then confirmation from the AESO that the information provided is sufficient is unnecessary. It is the AESO's responsibility to notify the market participant if the information provided is unsatisfactory.</p> <p>Finally, could the AESO explain what additional information is required for this standard, that</p>	

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			would not have already been provided to the AESO during the customer connection process or the equipment changes process (as referenced in OPP 1306)? If it is the case that the AESO will receive this information via other processes, the justification for this onerous process is eroded.	
	MR2. Confirmation exists that data and information has been provided as specified in requirement R2.	<input checked="" type="checkbox"/> New <input type="checkbox"/> Amended <input type="checkbox"/> Deleted Alberta measure added to align with requirement R2.	<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>	
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.	MR3 Confirmation exists that the data has been provided in accordance with the timelines specified in requirement R3.	<input type="checkbox"/> New <input checked="" type="checkbox"/> Amended <input type="checkbox"/> Deleted Alberta measure amended to align with requirement R3.	<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>	

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<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>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</p>		<p>There is no compliance section proposed in the Alberta Reliability Standards.</p> <p>Compliance with all Alberta Reliability Standards is completed by the ISO in accordance with ISO Rule 12 ISO Compliance Monitoring.</p>		
<p>Regional Differences None identified.</p>		Not applicable in Alberta		

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

Definitions	Comments	Rationale and/or Alternate Proposal
(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)