

Stakeholder Comment Form

Alberta Reliability Standards Process – October 2009

Proposed New Alberta Reliability Standards

Date of Request for Comment: August 13, 2009
Period of Consultation: August 13 through September 14, 2009

Comments From: Capital Power Corporation
Date: September 14, 2009
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Reliability Standard Number	Description	Stakeholder Comments
IRO-006-WECC-AB-1	Qualified Transfer Path Unscheduled Flow Relief	
PRC-001-AB-1	Protection System Coordination	With respect to R1 and M1, Capital Power would like the AESO to clarify that operators are only required to receive training regarding the purpose and limitations of protection schemes specific to the equipment located in their area of operation within the facility.
PRC-004-AB-1	Analysis and Mitigation of Transmission and Generation Protection System Misoperation	
PRC-004-WECC-AB-1	Protection System and Remedial Action Scheme Misoperation	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. 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.
PRC-005-AB-1	Transmission and Generation Protection System Maintenance and Testing	
PRC-016-AB-0	Remedial Action Scheme Misoperations	<p>Capital Power would like the AESO to clarify which generation protection systems are considered RAS and provide a list of all the RAS that have been applied to Capital Power facilities.</p> <p>CPC would like to further note that it disagrees with online testing as it results in equipment trips or degradation. The wear and tear on equipment would be excessive and result in a feedback of reporting testing as misoperations.</p> <p>With respect to the investigation and maintenance of misoperation records Capital Power would like the standard to explicitly state that GFOs are only responsible for the equipment under their operation.</p>

Please return this form with your comments by September 14, 2009, to:

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