



**Stakeholder Comment and Rationale Form**

**AESO AUTHORITATIVE DOCUMENT PROCESS**

**Stakeholder Consultation Draft**  
**2010-06-11**

**Alberta Reliability Standard – VAR-501-WECC-AB-1 Power System Stabilizer**

*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>2010-06-11</u> Period of Consultation [yyyy/mm/dd]: <u>2010-06-11</u> through <u>2010-07-09</u> Comments From: <u>Capital Power</u> Date [yyyy/mm/dd]: <u>2010-07-09</u>	Contact: <u>Jerry Mossing</u> Phone: <u>403-539-2496</u> E-mail: <u><a href="mailto:ars_comments@aesoc.ca">ars_comments@aesoc.ca</a></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 underneath (if any).*

1. Definitions	Comments	Rationale and/or Alternate Proposal
<b>(a) New</b>	<input type="checkbox"/> Support <input type="checkbox"/> Support with language suggestions <input type="checkbox"/> Oppose  <i>Insert Comments / Reason for Position (if any)</i>	



1. Definitions	Comments	Rationale and/or Alternate Proposal
<b>(b) Removals</b>	<input type="checkbox"/> Support <input type="checkbox"/> Support with language suggestions <input type="checkbox"/> Oppose  <i>Insert Comments / Reason for Position (if any)</i>	
<b>(c) Amendments</b>	<input type="checkbox"/> Support <input type="checkbox"/> Support with language suggestions <input type="checkbox"/> Oppose  <i>Insert Comments / Reason for Position (if any)</i>	
2. Alberta Reliability Standards	Comments	Rationale and/or Alternate Proposal
<b>(a) New Alberta Variances</b>	<input type="checkbox"/> Support <input type="checkbox"/> Support with language suggestions <input type="checkbox"/> Oppose  <i>Insert Comments / Reason for Position (if any)</i>	
<b>(b) Removals (Alberta Variances)</b>	<input type="checkbox"/> Support <input type="checkbox"/> Support with language suggestions <input type="checkbox"/> Oppose  <i>Insert Comments / Reason for Position (if any)</i>	



2. Alberta Reliability Standards	Comments	Rationale and/or Alternate Proposal
<p><b>(c) Amendments (Alberta Variances)</b></p> <p>The provisions within the proposed Alberta Reliability Standard <i>VAR-501-WECC-AB-1 Power System Stabilizer</i>, are derived from <i>NERC VAR-501-WECC-1</i> with the following amendments. An Alberta variance is a change from the NERC Reliability Standard that the AESO has determined is material.</p> <p>The following revisions have been made throughout this proposed reliability standard:</p> <ul style="list-style-type: none"> <li>- Identified the responsible entities in Alberta.</li> <li>- Applied a consistent writing style and added clarity.</li> <li>- Changed passive terms such as “shall” to “must”.</li> <li>- Developed measures specific to the requirements.</li> </ul> <p>Specifically, the following provisions are deemed as Alberta variances and have amended the existing NERC VAR-501-WECC-1 requirements.</p>		
<p><b>R1</b> Each operator of a synchronous generating unit equipped with a power system stabilizer must have the power system stabilizer in service 98% of all operating hours excluding the operating hours listed in requirements R 1.1 to 1.12, inclusive:</p> <p><b>R1.1</b> The operating hours during which the synchronous generating unit operates for less than five per cent of all hours during any calendar quarter.</p> <p><b>R1.2</b> The operating hours during which maintenance or testing on the power system stabilizer was performed, up to a maximum of seven calendar days per calendar quarter.</p> <p><b>R1.3</b> The operating hours during which power system stabilizer exhibits instability due to abnormal system configuration.</p> <p><b>R1.4</b> The operating hours during which the synchronous generating unit is operating in the synchronous condenser mode (very near zero real power level).</p> <p><b>R1.5</b> The operating hours during which the synchronous generating unit is generating less power than its design limit for effective power system stabilizer operation.</p> <p><b>R1.6</b> The operating hours during which the synchronous generating unit is passing through a range of output that is a known “rough zone” (including</p>	<p><input type="checkbox"/> Support  <input type="checkbox"/> Support with language suggestions  <input checked="" type="checkbox"/> Oppose</p> <p>R1.9 and R1.10 – Only the operator of a generating unit would be able to ensure that the generating unit is compliant with these requirements. For the standards to be fair, the compliance obligation should be directed at the party who has the ability to control physical compliance.</p> <p>Also, the AESO’s assumption that non-real time conditions should be the responsibility of owners does not take into account the existing owner-operator relationships for jointly owned facilities. Making these requirements applicable to GFOs will result in uncertainty as to which owner of a co-owned facility must manage and report on the maintenance of the power system stabilizer (PSS).</p>	<p>R1.9 and R1.10 – These requirements should apply to operators of generating units rather than GFOs.</p>



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<p>without limitation, a range in which a synchronous generating unit is experiencing excessive vibration).</p> <p><b>R1.7</b> The operating hours during which the synchronous generating unit's automatic voltage regulator is not in service.</p> <p><b>R1.8</b> The operating hours up to 60 consecutive days per incident, during which the power system stabilizer is out of service for repair due to a component failure.</p> <p><b>R1.9</b> The operating hours up to one year during which the power system stabilizer had a component failure, provided the GFO has submitted documentation identifying the need for time to obtain replacement parts and if required to schedule an outage.</p> <p><b>R1.10</b> The operating hours up to 24 months during which the power system stabilizer had a component failure, provided the GFO of such unit has submitted documentation identifying the need for time to replace the power system stabilizer and to schedule an outage.</p> <p><b>R1.11</b> The operating hours during which the synchronous generating unit has not achieved commercial operation.</p> <p><b>R1.12</b> The operating hours during which the ISO has directed an operator of a synchronous generating unit to operate such unit, and the power system stabilizer is unavailable for service.</p>	<p>Assigning the responsibility to the GFO may have been decided because the definition of Generator Operator (GOP) was reserved for companies that operate generating units that they do not own, as defined in the Alberta Reliability Standards functional entity registration criteria. Now that the AESO's TOAD initiative has suggested using the terms "operator of a generating unit", this broader description is more appropriate.</p>	
<p><b>R2.</b> Each GFO must have documentation identifying the number of operating hours excluded for each requirement R1.1 through R1.12, inclusive.</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 (if any)</i></p>	
<p><b>(d) Other</b> <i>(Stakeholders wishing to comment on specific provisions are requested to copy the provision into this area and provide comments)</i></p>	<p><b>Double Jeopardy concern</b> – OPP 1305 Section 4.2, and Item 15 on Tables 1, 2 and 3 specify identical requirements to those contained in this standard.</p> <p>We raised this issue with regard to CIP-001 and OPP 808 and it is our view that Market participants should not be put at risk of being found non-</p>	



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	compliant with multiple authoritative documents for a single action or inaction. Capital Power does not support the approval of this standard without the simultaneous removal of these provisions from OPP 1305.	