

**Stakeholder Comparison Comment Rationale Matrix**

**2010-07-22**

**AESO AUTHORITATIVE DOCUMENT PROCESS**

**Alberta Reliability Standard – EOP-008-AB-0 Plans for Loss of Control Centre Functionality**

*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]: 2010/07/22  
 Period of Consultation [yyyy/mm/dd]: 2010/07/22 through 2010/08/27  
 Comments From: Suncor Energy  
 Date [yyyy/mm/dd]: 2010/08/27

Contact: Jerry Mousing  
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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 EOP-008-0 AND ALBERTA EOP-008-AB-0  
PLANS FOR LOSS OF CONTROL CENTRE FUNCTIONALITY**

NERC EOP-008-0	Alberta EOP-008-AB-0	AESO Reason for Difference	Stakeholder Comments	AESO Replies
<p><b>Purpose</b> Each reliability entity must have a plan to continue reliability operations in the event its control center becomes inoperable.</p>	<p><b>Purpose</b> The purpose of this <b>reliability standard</b> is to ensure that each <b>reliability</b> entity has a plan to continue <b>reliability</b> operations if its control center functionality is lost.</p>	<p>Clarified the purpose to align with the content of the reliability standard.</p>		
<p><b>Applicability</b> 4.1. Transmission Operators. 4.2. Balancing Authorities. 4.3. Reliability Coordinators.</p>	<p><b>Applicability</b> This <b>reliability standard</b> applies to:</p> <ul style="list-style-type: none"> <li>• the <b>operator</b> of a <b>transmission facility</b>; and</li> <li>• - the <b>ISO</b>.</li> </ul>	<p> <input type="checkbox"/> New  <input checked="" type="checkbox"/> Amended  <input type="checkbox"/> Deleted         </p> <p>Amended to identify the responsible entities in Alberta.</p>	<p> <input type="checkbox"/> Support  <input type="checkbox"/> Support with language suggestions  <input checked="" type="checkbox"/> Oppose         </p> <p><i>Suncor is concerned that the term 'operator of a transmission facility' can be applied in a manner which is too broad, and may include entities which have a transmission interconnection (i.e. generators) but are not traditional transmission facility operators. Suncor wishes to see a greater degree of specificity in the definition of what the entity is.</i></p> <p><i>- Suncor expects that there will be changes in the registration process and definitions of functional entities to capture the above comment, and that these changes will be sent out for stakeholder comment.</i></p> <p><i>- Suncor would like new definitions</i></p>	

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			<i>to be discussed and go through the stakeholder consultation process before being added to a reliability standard.</i>	
<p><b>Effective Date</b> April 1, 2005</p>	<p><b>Effective Date</b> Ninety (90) <b>days</b> after the date the <b>Commission</b> approves it.</p>	<p>To allow a reasonable amount of time for Alberta entities to implement this Alberta Reliability Standard.</p>	<p><input type="checkbox"/> Support <input type="checkbox"/> Support with language suggestions <input checked="" type="checkbox"/> Oppose</p> <p><i>A 90 day effective date is too stringent for those who do not already have a maintenance and testing program in place. Suncor recommends that the effective dates should allow enough time for entities to develop the program as required (e.g. 2-3 years)</i></p>	
<p><b>R1.</b> Each Reliability Coordinator, Transmission Operator and Balancing Authority shall have a plan to continue reliability operations in the event its control center becomes inoperable. The contingency plan must meet the following requirements:</p> <p><b>R1.1.</b> The contingency plan shall not rely on data or voice communication from the primary control facility to be</p>	<p><b>R1.</b> The <b>ISO</b> and each <b>operator</b> of a <b>transmission facility</b> must have a plan to continue reliable operations if its primary control center functionality is lost. The plan must include the following:</p> <p><b>R1.1.</b> provisions for continued operations that do not solely rely on data or voice communication from the primary control centre.</p>	<p><input type="checkbox"/> New <input checked="" type="checkbox"/> Amended <input type="checkbox"/> Deleted</p> <p>Amended for clarity and consistency.</p> <p><b>Alberta Variance:</b> Sub-requirement R1.1 was amended to allow for the use of data or voice communication if the reason for evacuation does not affect the performance of equipment.</p>	<p><input type="checkbox"/> Support <input type="checkbox"/> Support with language suggestions <input checked="" type="checkbox"/> Oppose</p> <p><i>Suncor would like clarification if this requirement is to apply to those with transmission interconnections, or strictly to traditional TFOs.</i></p>	

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<p>viable.</p> <p><b>R1.2.</b> The plan shall include procedures and responsibilities for providing basic tie line control and procedures and for maintaining the status of all inter-area schedules, such that there is an hourly accounting of all schedules.</p> <p><b>R1.3.</b> The contingency plan must address monitoring and control of critical transmission facilities, generation control, voltage control, time and frequency control, control of critical substation devices, and logging of significant power system events. The plan shall list the critical facilities.</p> <p><b>R1.4.</b> The plan shall include procedures and responsibilities for maintaining basic voice communication capabilities with other areas.</p> <p><b>R1.5.</b> The plan shall include procedures and responsibilities for conducting periodic tests, at least annually, to ensure viability of the plan.</p>	<p><b>R1.2.</b> for the <b>ISO</b>, <b>intertie</b> operation and scheduling procedures and responsibilities for maintaining the status of <b>interchange schedules</b>, such that there will be an hourly accounting of all <b>interchange schedules</b>.</p> <p><b>R1.3.</b> for each <b>operator</b> of a <b>transmission facility</b> responsible for <b>intertie</b> control, procedures and responsibilities for <b>intertie</b> control and for maintaining the status of <b>net scheduled interchange</b>.</p> <p><b>R1.4.</b> procedures for monitoring and control of vital <b>transmission facilities, automatic generation control</b>, voltage control, time and frequency control, control of vital substation devices and for logging of significant <b>system</b> events.</p> <p><b>R1.5</b> a list of or reference to all vital <b>transmission facilities</b>.</p> <p><b>R1.6.</b> procedures and responsibilities for maintaining voice communication capabilities.</p> <p><b>R1.7.</b> procedures and responsibilities for conducting periodic tests of the</p>	<p><b>Alberta Variance:</b> Sub-requirement R1.2 was divided into two requirements (R1.2 and R1.3) to delineate the responsibilities of the ISO and an operator of a transmission facility.</p> <p><b>Alberta Variance:</b> Sub-requirement R1.3 was divided into two requirements (R1.4 and R1.5) to delineate between ongoing operations and system events.</p>	<p><i><b>R1.4/1.5</b> – The wording here should be changed to reflect the wording found in standards such as PRC-023-AB-1, namely “as identified by the ISO as critical to the reliability of the BES” in place of “vital”</i></p>	

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<p><b>R1.6.</b> The plan shall include procedures and responsibilities for providing annual training to ensure that operating personnel are able to implement the contingency plans.</p>	<p>plan, at least once per calendar year.</p> <p><b>R1.8.</b> procedures and responsibilities for provide training at least once per calendar year to ensure that operating personnel are able to implement the plan.</p>	<p><b>Alberta Variance:</b> Sub-requirements R1.7, R1.8 were changed from annually to once per calendar year to align with the approach taken in other related Alberta reliability standards.</p>		
<p><b>R1.7.</b> The plan shall be reviewed and updated annually.</p>	<p><b>R2.</b> The <b>ISO</b> and each <b>operator</b> of a <b>transmission facility</b> must review and update their respective plans as specified in requirement R1 at least once per calendar year.</p>	<p><input type="checkbox"/> New  <input checked="" type="checkbox"/> Amended  <input type="checkbox"/> Deleted</p> <p>Amended to for clarity and consistency.</p> <p>Changed annually to once per calendar year to align with the approach taken in other related Alberta reliability standards.</p>	<p><input checked="" 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>	
<p><b>R1.8.</b> Interim provisions must be included if it is expected to take more than one hour to implement the contingency plan for loss of primary control facility</p>	<p><b>R3.</b> The <b>ISO</b> and each <b>operator</b> of a <b>transmission facility</b> must include interim provisions in the plan as required in requirement R1 if it is expected to take more than one (1) hour to implement the plan for loss of primary control centre.</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 checked="" 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>	
	<p><b>MR1.</b> A documented plan exists and includes all applicable elements specified in sub-requirements R1.1 to</p>	<p><input checked="" type="checkbox"/> New  <input type="checkbox"/> Amended</p>	<p><input type="checkbox"/> Support  <input type="checkbox"/> Support with language suggestions</p>	

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	<p>R1.8.</p> <p><b>MR1.1</b> Evidence exists that communications are in place and do not rely on the primary control centre as specified in requirement R1.1.</p> <p><b>MR1.2</b> Procedures and responsibilities exist in the plan as specified in requirement R1.2</p> <p><b>MR1.3</b> Procedures and responsibilities exist in the plan as specified requirement R1.3.</p> <p><b>MR1.4</b> Procedures exist as specified in requirement R1.4.</p> <p><b>MR1.5</b> A list of or reference to vital <b>transmission facilities</b> exists as specified in requirement R1.5.</p> <p><b>MR1.6</b> Procedures exist and meet technical requirements as specified in requirement R1.6.</p> <p><b>MR1.7</b> Testing procedures exist and meet requirements as specified in requirement R1.7.</p> <p><b>MR1.8</b> Training records exist to show that the <b>ISO</b> and each <b>operator</b> of a</p>	<p><input type="checkbox"/> Deleted</p> <p>Added to align with requirement R1 and its sub-requirements.</p>	<p><input checked="" type="checkbox"/> Oppose</p> <p><i>Insert comments, reason for position, and alternate proposal (if any).</i></p> <p><b>MR1.5</b> – Suncor would like to see this measure changed to match its suggested wording for R1.5</p> <p><b>MR1.6</b> – This measure does not match with its requirement. Suncor recommends removing the word ‘technical’.</p> <p><b>MR1.1 to MR1.8</b> - Suncor is of the opinion that MR1, as proposed below, would be sufficient to measure compliance against R1.1 through R1.8.</p>	

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	<p><b>transmission facility</b> conducted training as specified in requirement R1.8.</p>			
	<p><b>MR2.</b> Evidence exists that the <b>ISO</b> and each <b>operator</b> of a <b>transmission facility</b> have reviewed and updated their respective plans as specified in requirement R2.</p>	<p><input checked="" type="checkbox"/> New  <input type="checkbox"/> Amended  <input type="checkbox"/> Deleted</p> <p>Added to align with requirement R2.</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>	
<p><b>M1.</b> Evidence that the Reliability Coordinator, Transmission Operator or Balancing Authority has developed and documented a current contingency plan to continue the monitoring and operation of the electrical equipment under its control to maintain Bulk Electrical System reliability if its primary control facility becomes inoperable.</p>	<p><b>MR3.</b> Interim provisions exist in the plan, as specified in requirement R3.</p>	<p><input type="checkbox"/> New  <input checked="" type="checkbox"/> Amended  <input type="checkbox"/> Deleted</p> <p>Amended to align with requirement R3.</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>	
<p><b>Compliance</b>  To view the compliance section D of the NERC reliability standard follow this link:  <a href="http://www.nerc.com/files/EOP-008-0.pdf">http://www.nerc.com/files/EOP-008-0.pdf</a></p>		<p>The Alberta reliability standards do not contain a compliance section. Compliance with all Alberta reliability standards is completed in accordance with the Alberta Reliability Standards Compliance Monitoring Program, available on the AESO website at:  <a href="http://www.aeso.ca/loadsettlement/1">http://www.aeso.ca/loadsettlement/1</a></p>		

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		<a href="#">7189.html</a> .		
<b>Regional Differences</b> None identified.	None identified.	Not applicable in Alberta		

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

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