March 23, 2015

To: Alberta Utilities Commission (“AUC”)  


The Alberta Electric System Operator (“AESO”) recommends that the AUC approve the final proposed new blackstart resource definition, pursuant to section 19 of the Transmission Regulation.

Background

Consistent with the AESO’s drafting principles for authoritative documents, the AESO has determined that it is appropriate for defined terms used in the Alberta reliability standards to go through the same consultation process as the Alberta reliability standards themselves. The AESO has determined that there is a need for a new defined term in the Alberta reliability standards.

The AESO proposes to incorporate the following defined term, along with the related definition, into the AESO’s Consolidated Authoritative Document Glossary ("CADG"). This term is new and has not previously been incorporated into the AESO’s CADG:

1. “blackstart resource”

The final proposed new blackstart resource definition is referenced in final proposed new EOP-006-AB-2, System Restoration Coordination ("EOP-006-AB-2") and in the final proposed new Critical Infrastructure Protection Alberta reliability standards. These are currently the only two instances in which the blackstart resource definition is referenced in the Alberta reliability standards.

On September 29, 2014, the AESO issued a Forwarding Notice to the AUC recommending the approval of the Final Proposed New Critical Infrastructure Protection Alberta Reliability Standards Terms and Definitions ("CIP ARS Terms and Definitions"). As part of the filing, the AESO recommended that the term "blackstart resource" be adopted for inclusion in its CADG. The proposed CIP ARS Terms and Definitions are currently the subject of AUC proceeding 3442, such that their effective date has not yet been determined.

On March 23, 2015, the AESO issued a Forwarding Notice to the AUC recommending the approval of the final proposed new Alberta Reliability Standard EOP-006-AB-2. As noted above, the term "blackstart resource" also appears in final proposed new EOP-006-AB-2. The proposed effective date of final proposed new EOP-006-AB-2 is earlier than the proposed effective date of the CIP ARS Terms and Definitions. Further, as noted above, the actual effective date of the CIP ARS Terms and Definitions has not yet been determined. In the interim, the AESO recommends that the blackstart resource term and definition now be adopted to apply only to EOP-006-AB-2, so that the term and definition as consulted on and included in the CIP ARS Terms and Definitions may advance through Proceeding 3442.

1 Section 19(4) of the Transmission Regulation states that, before adopting or making a reliability standard, “the ISO must consult with those Market Participants that it considers are likely to be directly affected”.

2 A notation will be included in the CADG to indicate that this definition only applies to EOP-006-AB-002.
AESO Consultation

The blackstart resource definition was consulted on with market participants as part of the CIP ARS Terms and Definitions. The AESO received one comment on this definition, which was addressed in the AESO's reply. As it is the AESO's view that market participants are not likely to be directly affected by the final proposed new EOP-006-AB-2, no formal consultation with market participants was undertaken in respect of the final proposed new EOP-006-AB-2. As such, and as the approval of the use of the term and definition for blackstart resource is limited to EOP-006-AB-2, it is the AESO's view that no additional consultation with market participants is necessary with respect to the blackstart resource definition.

Attachments to Forwarding Notice

The following documents are attached to this Forwarding Notice:

1) Clean copy of the final proposed blackstart resource definition, as proposed to apply only to EOP-006-AB-2;

2) Forwarding Notice on Final Proposed New Critical Infrastructure Protection Alberta Reliability Standards Terms and Definitions.

Proposed Effective Date

The AESO recommends that the AUC approve the final proposed blackstart resource definition, as proposed to apply only to EOP-006-AB-2, to become effective concurrent with EOP-006-AB-2.

The AESO submits that the final proposed blackstart resource definition complies with the requirements of the Transmission Regulation, is not technically deficient and is in the public interest.

If you have any questions, please contact the undersigned.

Sincerely,

“Original Signed By “

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Attachments