



**Stakeholder Comparison Comment Rationale Matrix**

**2010-08-17**

**AESO AUTHORITATIVE DOCUMENT PROCESS**

**Alberta Reliability Standard – MOD-024&025-AB-1 Verification of Generator Real and Reactive Power Capability**

*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>2010/08/17</u>	ATCO Contact: <u>Mary Dylke</u>
Period of Consultation [yyyy/mm/dd]: <u>2010/08/17</u> through <u>2010/09/17</u>	Phone: <u>403-245-7521</u>
Comments From: <u>ATCO power</u>	E-mail: <u>Mary.Dylke@atcopower.com</u>
Date [yyyy/mm/dd]: <u>September 17, 2010</u>	

*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 MOD-024-1 AND MOD-025-1 AND ALBERTA MOD-024&025-AB-1

Verification of Generator Real and Reactive Power Capability

NERC MOD-024-1 and MOD-025-1	Alberta MOD-024&025-AB-1	AESO Reason for Difference	Stakeholder Comments	AESO Replies
<p><b>Purpose</b>  <b>MOD-024</b> To ensure accurate information on generator gross and net Real Power capability is available for steady-state models used to assess Bulk Electric System reliability.</p> <p><b>MOD-025</b> To ensure accurate information on generator gross and net Reactive Power capability is available for steady-state models used to assess Bulk Electric System reliability.</p>	<p><b>Purpose</b>  The purpose of this <b>reliability standard</b> is to ensure accurate information on the <b>gross real power, gross reactive power, net real power, and net reactive power</b> capability of a <b>generating unit</b> or an <b>aggregated generating facility</b> is reported to the <b>ISO</b>.</p>	<p>The purpose of this reliability standard is to ensure the gross real power, gross reactive power, net real power and net reactive power capabilities are reported to the AESO. The maximum values of these capabilities are determined under the:</p> <ul style="list-style-type: none"> <li>• AESO Generation and Load Interconnection Standard (<a href="http://www.aeso.ca/downloads/Generation_and_Load_Standard_Rev1.pdf">http://www.aeso.ca/downloads/Generation_and_Load_Standard_Rev1.pdf</a>),</li> <li>• AESO Wind Power Facility Technical Requirements <a href="http://www.aeso.ca/downloads/Wind_Power_Facility_Technical_Requirements_Revision0_signature_JRF.pdf">http://www.aeso.ca/downloads/Wind_Power_Facility_Technical_Requirements_Revision0_signature_JRF.pdf</a>,</li> <li>• power purchase arrangements and/or</li> <li>• Application Guideline Generator Interconnection Requirements – Reactive Power <a href="http://www.aeso.ca/downloads/AESO_PPA_Reactive_Power_Guidelines.pdf">http://www.aeso.ca/downloads/AESO_PPA_Reactive_Power_Guidelines.pdf</a> .</li> </ul>		
<b>Applicability</b>	<b>Applicability</b>			

COMPARISON BETWEEN NERC MOD-024-1 AND MOD-025-1 AND ALBERTA MOD-024&025-AB-1

Verification of Generator Real and Reactive Power Capability

NERC MOD-024-1 and MOD-025-1	Alberta MOD-024&025-AB-1	AESO Reason for Difference	Stakeholder Comments	AESO Replies
<p><b>MOD-024</b> 4.1. Regional Reliability Organization. 4.2. Generation Owner.</p> <p><b>MOD-025</b> 4.1. Regional Reliability Organization. 4.2. Generation Owner.</p>	<p>This <b>reliability standard</b> applies to:</p> <ul style="list-style-type: none"> <li>the <b>legal owner</b> of a <b>generating unit</b> with a <b>maximum authorized real power</b> rating of 9 <b>MW</b> or greater and which is directly connected to the <b>transmission system</b>;</li> <li>the <b>legal owner</b> of an <b>aggregated generating</b> facility with a <b>maximum authorized real power</b> rating of 18 <b>MW</b> or greater and which is directly connected to the <b>transmission system</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><b>Alberta Variance:</b> As a result of the similarity and commonality of the subject matter requirements and measures of NERC standards MOD-024-1 and MOD-025-1, they have been combined into one Alberta reliability standard MOD-024&amp;025-AB-1.</p> <p>The value of 9 MW was selected as it equals 10 MVA @ .9 pf. and 10 MVA is the value referred to in the WECC (WSCC) document <i>Synchronous Machine Reactive Capability Verification</i> dated November 25, 1996 <a href="http://www.wecc.biz/library/WECC%20Documents/Documents%20for%20Generators/Generator%20Testing%20Program/Synchronous%20Machine%20Reactive%20Limits%20Verification.pdf">http://www.wecc.biz/library/WECC%20Documents/Documents%20for%20Generators/Generator%20Testing%20Program/Synchronous%20Machine%20Reactive%20Limits%20Verification.pdf</a> and the 18 MW (20 MVA) is the value referred to in the WECC <i>Generating Unit Model Validation Policy</i> <a href="http://www.wecc.biz/library/WECC%20Documents/Documents%20for%20Generators/Generator%20Testing%20Program/Synchronous%20Machine%20Reactive%20Limits%20Verification.pdf">http://www.wecc.biz/library/WECC%20Documents/Documents%20for%20Generators/Generator%20Testing%20Program/Synchronous%20Machine%20Reactive%20Limits%20Verification.pdf</a></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>	

COMPARISON BETWEEN NERC MOD-024-1 AND MOD-025-1 AND ALBERTA MOD-024&025-AB-1

Verification of Generator Real and Reactive Power Capability

NERC MOD-024-1 and MOD-025-1	Alberta MOD-024&025-AB-1	AESO Reason for Difference	Stakeholder Comments	AESO Replies
		<p><a href="http://www.aeso.ca/Documents/Forms/AllItems.aspx?RootFolder=%2flibrary%2fWECC%20Documents%2fDocuments%20for%20Generators%2fGenerator%20Testing%20Program&amp;FolderCTID=0x012000278A29140A43884799CB122F821DFD01&amp;View=%7bAF8E6257%2d3EB9%2d4A21%2d8853%2d6477737956B4%7d">http://www.aeso.ca/Documents/Forms/AllItems.aspx?RootFolder=%2flibrary%2fWECC%20Documents%2fDocuments%20for%20Generators%2fGenerator%20Testing%20Program&amp;FolderCTID=0x012000278A29140A43884799CB122F821DFD01&amp;View=%7bAF8E6257%2d3EB9%2d4A21%2d8853%2d6477737956B4%7d</a> "GTTF 2006-05 Generating Unit Model Validation Policy.pdf" for aggregated generating facilities.</p>		
<p><b>Effective Date MOD-024</b> Requirement 1 and Requirement 2 — April 1, 2006. Requirement 3 — January 1, 2007.</p> <p><b>MOD-025</b> Requirement 1 and Requirement 2 — January 1, 2007 Requirement 3: January 1, 2008 — 1st 20% compliant January 1, 2009 — 2nd 20% compliant January 1, 2010 — 3rd 20% compliant January 1, 2011 — 4th 20% compliant January 1, 2012 — 5th 20%</p>	<p><b>Effective Date</b> Ninety (90) days after the date the <b>Commission</b> approves it.</p>	<p>The AESO is using the WECC <i>Generator Testing Policy Implementation</i> <a href="http://www.wecc.biz/library/WECC%20Documents/Documents%20for%20Generators/Generator%20Testing%20Program/Generator%20Testing%20Policy%20Implementation%202006-10-27.pdf">http://www.wecc.biz/library/WECC%20Documents/Documents%20for%20Generators/Generator%20Testing%20Program/Generator%20Testing%20Policy%20Implementation%202006-10-27.pdf</a> as the basis for implementing this reliability standard. The following is an excerpt from the WECC Generator Testing Policy Implementation dated 2006-10-27:</p> <p><i>Issue 2: A large number of Generator Owners, who complied with the original baseline test requirement, are required to perform model re-</i></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>Due to the relatively high number of standards that the AESO is planning to implement over a fairly short period of time, ATCO Power suggests careful consideration be given to effective dates.</p> <p>Where 90 days may seem reasonable for a few standards,</p>	

**COMPARISON BETWEEN NERC MOD-024-1 AND MOD-025-1 AND ALBERTA MOD-024&025-AB-1**

**Verification of Generator Real and Reactive Power Capability**

NERC MOD-024-1 and MOD-025-1	Alberta MOD-024&025-AB-1	AESO Reason for Difference	Stakeholder Comments	AESO Replies
compliant		<p><i>validation. Many of the Owners have multiple generating facilities. From resource management standpoint, the Owners should be allowed to spread generator re-validation over a five-year period. Many Generator Owners are in the midst of the equipment replacement programs. It makes sense to coordinate the re-validation efforts with the respective replacement programs, as well as maintenance cycles. On the other hand, WECC should have the authority to accept or reject the re-validation schedule proposed by the Generator Owners.</i></p> <p><i>Generator Owners that have complied with the baseline test requirements (as defined in section B.1.2 of the Policy) shall provide to WECC staff, by December 31, 2006, a schedule to perform model re-validation (as defined in section B.1.3 of the Policy). The Generator Owner should coordinate the schedule with the appropriate Transmission Planner(s). The Generator Owner will be considered compliant with the Policy as long as the initial model re-validation is completed within 5 years from December 31, 2006.</i></p>	<p>many more are shown in AESO's planning documents for implementation over the next quarter and early in 2011. Companies will be unable to keep up with this implementation pace as detailed assessments, gap analysis, process development, training, etc. must all be undertaken with limited resources.</p> <p>ATCO Power suggests a minimum effective date of 180 days following approval for any standard and, depending on the complexity of the implementation process required for a particular standard, and the number of other standards with implementation periods that overlap, more time may be required.</p>	

COMPARISON BETWEEN NERC MOD-024-1 AND MOD-025-1 AND ALBERTA MOD-024&025-AB-1

Verification of Generator Real and Reactive Power Capability

NERC MOD-024-1 and MOD-025-1	Alberta MOD-024&025-AB-1	AESO Reason for Difference	Stakeholder Comments	AESO Replies
<p><b>MOD-024 R1.</b> The Regional Reliability Organization shall establish and maintain procedures to address verification of generator gross and net Real Power capability. These procedures shall include the following:</p> <p><b>MOD-024 R1.1.</b> Generating unit exemption criteria including documentation of those units that are exempt from a portion or all of these procedures.</p> <p><b>MOD-024 R1.2.</b> Criteria for reporting generating unit auxiliary loads.</p> <p><b>MOD-024 R1.3.</b> Acceptable methods for model and data verification, including any applicable conditions under which the data should be verified. Such methods can include use of manufacturer data, commissioning data, performance tracking, and testing, etc.</p> <p><b>MOD-024 R1.4.</b> Periodicity and schedule of model and data verification and reporting.</p> <p><b>MOD-024 R1.5.</b> Information to be</p>		<p><input type="checkbox"/> New  <input type="checkbox"/> Amended  <input checked="" type="checkbox"/> Deleted</p> <p><b>Alberta Variance:</b> NERC requirement R1 and it's sub-requirements of MOD-024 and MOD-025 is a WECC responsibility and does not apply to any entities in Alberta.</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>	

COMPARISON BETWEEN NERC MOD-024-1 AND MOD-025-1 AND ALBERTA MOD-024&025-AB-1

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<p>verified and reported:</p> <p><b>MOD-024 R1.5.1.</b> Seasonal gross and net Real Power generating capabilities.</p> <p><b>MOD-024 R1.5.2.</b> Real power requirements of auxiliary loads.</p> <p><b>MOD-024 R1.5.3.</b> Method of verification, including date and conditions.</p> <p><b>MOD-025 R1.5.4.</b> Method of verification, including date and conditions.</p> <p><b>MOD-025 R1.</b> The Regional Reliability Organization shall establish and maintain procedures to address verification of generator gross and net Reactive Power capability. These procedures shall include the following:</p> <p><b>MOD-025 R1.1.</b> Generating unit exemption criteria including documentation of those units that are exempt from a portion or all of these procedures.</p> <p><b>MOD-025 R1.2.</b> Criteria for reporting generating unit auxiliary loads.</p> <p><b>MOD-025 R1.3.</b> Acceptable methods for model and data verification,</p>				

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<p>including any applicable conditions under which the data should be verified. Such methods can include use of commissioning data, performance tracking, engineering analysis, testing, etc.</p> <p><b>MOD-025 R1.4.</b> Periodicity and schedule of model and data verification and reporting.</p> <p><b>MOD-025 R1.5.</b> Information to be reported:</p> <p><b>MOD-025 R1.5.1.</b> Verified maximum gross and net Reactive Power capability (both lagging and leading) at Seasonal Real Power generating capabilities as reported in accordance with Reliability Standard MOD-024 Requirement 1.5.1.</p> <p><b>MOD-025 R1.5.2.</b> Verified Reactive Power limitations, such as generator terminal voltage limitations, shorted rotor turns, etc.</p> <p><b>MOD-025 R1.5.3.</b> Verified Reactive Power of auxiliary loads.</p> <p><b>MOD-025 R1.5.4.</b> Method of verification, including date and conditions.</p>				
<p><b>MOD-024 R2.</b> The Regional Reliability Organization shall provide</p>		<input type="checkbox"/> New	<input type="checkbox"/> Support <input type="checkbox"/> Support with language	

COMPARISON BETWEEN NERC MOD-024-1 AND MOD-025-1 AND ALBERTA MOD-024&025-AB-1

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<p>its generator gross and net Real Power capability verification and reporting procedures, and any changes to those procedures, to the Generator Owners, Generator Operators, Transmission Operators, Planning Authorities, and Transmission Planners affected by the procedure within 30 calendar days of the approval.</p> <p><b>MOD-025 R2.</b> The Regional Reliability Organization shall provide its generator gross and net Reactive Power capability verification and reporting procedures, and any changes to those procedures, to the Generator Owners, Generator Operators, Transmission Operators, Planning Authorities, and Transmission Planners affected by the procedure within 30 calendar days of the approval.</p>		<p><input type="checkbox"/> Amended <input checked="" type="checkbox"/> Deleted</p> <p><b>Alberta Variance:</b> NERC requirement R2 of MOD-024 and MOD-025 is a WECC responsibility and does not apply to any entities in Alberta.</p>	<p>suggestions <input type="checkbox"/> Oppose</p> <p><i>Insert comments, reason for position, and alternate proposal (if any).</i></p>	
<p><b>MOD-024 R3.</b> The Generator Owner shall follow its Regional Reliability Organization's procedures for verifying and reporting its gross and net Real Power generating capability per R1.</p> <p><b>MOD-025 R3.</b> The Generator Owner shall follow its Regional Reliability</p>	<p><b>R1</b> Each <b>legal owner</b> must comply with the procedures the <b>ISO</b> may publish on the AESO website, and as may be amended from time to time by the AESO on notice to market participants, for verifying and reporting generating capability for:</p> <ul style="list-style-type: none"> <li>• <b>gross real power</b></li> <li>• <b>gross reactive power</b></li> </ul>	<p><input type="checkbox"/> New <input checked="" type="checkbox"/> Amended <input type="checkbox"/> Deleted</p> <p>NERC requirement R3 has been split into R1, R1.1 and R2 to clarify that the procedures that must be complied with are those published by</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>	

COMPARISON BETWEEN NERC MOD-024-1 AND MOD-025-1 AND ALBERTA MOD-024&025-AB-1

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NERC MOD-024-1 and MOD-025-1	Alberta MOD-024&025-AB-1	AESO Reason for Difference	Stakeholder Comments	AESO Replies
<p>Organization's procedures for verifying and reporting its gross and net Reactive Power generating capability per R1.</p>	<ul style="list-style-type: none"> <li>• <b>net real power</b> and</li> <li>• <b>net reactive power</b></li> </ul> <p>except as contemplated in requirement R1.1.</p> <p><b>R1.1</b> In the absence of a published <b>ISO</b> procedure, each <b>legal owner</b> must comply with the policies and procedures the <b>WECC</b> publishes for verifying and reporting generating capability for:</p> <ul style="list-style-type: none"> <li>• <b>gross real power</b></li> <li>• <b>gross reactive power</b></li> <li>• <b>net real power</b> and</li> <li>• <b>net reactive power</b></li> </ul> <p><b>R2</b> Any <b>ISO</b> procedures published as contemplated in requirement R1 must be equal to or more stringent than the procedures the <b>WECC</b> publishes.</p>	<p>the AESO or by the WECC.</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 related external documents, including WECC documents.</p> <p>The AESO currently does not have any procedures as contemplated in MOD-024&amp;025-AB requirement R1 and requirement R2. Below are applicable WECC procedures that apply pursuant to R1.1 of this reliability standard:</p> <ol style="list-style-type: none"> <li>1. "Synchronous Machine Reactive Limits Verification"... <a href="http://www.wecc.biz/library/WECC%20Documents/Documents%20for%20Generators/Generator%20Testing%20Program/Synchronous%20Machine%20Reactive%20Limits%20Verification.pdf">http://www.wecc.biz/library/WECC%20Documents/Documents%20for%20Generators/Generator%20Testing%20Program/Synchronous%20Machine%20Reactive%20Limits%20Verification.pdf</a></li> <li>2. "Facility Data Requirements" document. Access this document by following this link: <a href="http://www.wecc.biz/library/WECC%20Documents/Forms/AllItems.aspx?">http://www.wecc.biz/library/WECC%20Documents/Forms/AllItems.aspx?</a></li> </ol>	<p>R2: ATCO Power's position is that the AESO's published procedures may be "equal to" but not "more stringent than" WECC procedures.</p>	

**COMPARISON BETWEEN NERC MOD-024-1 AND MOD-025-1 AND ALBERTA MOD-024&025-AB-1**

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NERC MOD-024-1 and MOD-025-1	Alberta MOD-024&025-AB-1	AESO Reason for Difference	Stakeholder Comments	AESO Replies
		<p><a href="#">RootFolder=%2flibrary%2fWECC%20Documents%2fDocuments%20for%20Generators%2fGenerator%20Testing%20Program&amp;FolderCTID=&amp;View=%7bAF8E6257%2d3EB9%2d4A21%2d8853%2d6477737956B4%7d</a></p> <p>And then open the following folders and documents:</p> <ul style="list-style-type: none"> <li>• “2006 Generator Test Policy” folder</li> <li>• “2006 Generator Test Program” folder</li> <li>• “GTTF_2005_12_Generating_Facility_Data Requirements.pdf” file</li> </ul>		
<p><b>MOD-024 M1.</b> The Regional Reliability Organization shall have available for inspection the procedures for the verification and reporting of generator gross and net Real Power capability in accordance with R1.</p> <p><b>MOD-025 M1.</b> The Regional Reliability Organization shall have available for inspection the procedures for the verification and reporting of generator gross and net Reactive Power capability in</p>		<p><input type="checkbox"/> New  <input type="checkbox"/> Amended  <input checked="" type="checkbox"/> Deleted</p> <p>Deleted to align with the removal of NERC R1.</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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accordance with R1.				
<p><b>MOD-024 M2.</b> The Regional Reliability Organization shall have evidence that its procedures, and any revisions to those procedures, for verification and reporting of generator gross and net Real Power capability were provided to affected Generator Owners, Generator Operators, Transmission Operators, Planning Authorities, and Transmission Planners within 30 calendar days of approval.</p> <p><b>MOD-025 M2.</b> The Regional Reliability Organization shall have evidence that its procedures, and any revisions to these procedures, for verification and reporting of generator gross and net Reactive Power capability were provided to affected Generator Owners, Generator Operators, Transmission Operators, Planning Authorities, and Transmission Planners within 30 calendar days of approval.</p>		<p><input type="checkbox"/> New  <input type="checkbox"/> Amended  <input checked="" type="checkbox"/> Deleted</p> <p>Deleted to align with the removal of NERC 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>MOD-024 M3.</b> The Generator Owner shall have evidence it provided verified information of its generator gross and net Real Power capability, consistent with that Regional Reliability Organization's procedures.</p>	<p><b>MR1</b> Confirmation exists that the <b>legal owner</b> has complied with procedures as specified in requirement R1.</p> <p><b>MR1.1</b> Evidence exists that each</p>	<p><input type="checkbox"/> New  <input checked="" type="checkbox"/> Amended  <input type="checkbox"/> Deleted</p> <p>Amended to align with requirement</p>	<p><input type="checkbox"/> Support  <input type="checkbox"/> Support with language suggestions  <input type="checkbox"/> Oppose</p> <p><i>Insert comments, reason for</i></p>	

COMPARISON BETWEEN NERC MOD-024-1 AND MOD-025-1 AND ALBERTA MOD-024&025-AB-1

Verification of Generator Real and Reactive Power Capability

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<p><b>MOD-025 M3.</b> The Generator Owner shall have evidence it provided verified information of its generator gross and net Reactive Power capability, consistent with that Regional Reliability Organization's procedures.</p>	<p>legal owner has complied with the policies and procedures the WECC publishes within 5 years from December 31, 2006.</p> <p><b>MR2</b> Where <b>ISO</b> procedures exist as specified in requirement R2, those procedures are equal to or more stringent than the procedures for such verification and reporting the <b>WECC</b> publishes.</p>	<p>R1 and its sub-requirements and R2 of this reliability standard.</p>	<p><i>position, and alternate proposal (if any).</i></p> <p>MR1: As noted in previously submitted comments, ATCO does not support measures that require "confirmation." Such measure requirements are unnecessarily onerous for companies and the AESO and exceed requirements of corresponding NERC measurements, which require the existence of "evidence."</p> <p>ATCO again urges the AESO to revise all measures that require "confirmation" such that they require the existence of "evidence."</p> <p>MR2: ATCO Power's position is that the AESO's published procedures may be "equal to" but not "more stringent than" WECC procedures.</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/MOD-024-1.pdf">http://www.nerc.com/files/MOD-024-1.pdf</a> <a href="http://www.nerc.com/files/MOD-025-1.pdf">http://www.nerc.com/files/MOD-025-1.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</p>		

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		AESO website at: <a href="http://www.aeso.ca/loadsettlement/17189.html">http://www.aeso.ca/loadsettlement/17189.html</a> .		
<b>Regional Differences</b> None identified.	None identified.	Not applicable in Alberta		

Definitions	Comments	Rationale and/or Alternate Proposal
<p><b>(a) New</b></p> <p>“gross reactive power” means:</p> <p>(i) for <b>aggregated generating facilities</b> with one or more <b>collector busses</b>, the sum of <b>reactive power</b> measurements at those <b>collector busses</b>;</p> <p>(ii) for <b>aggregated generating facilities</b> without a <b>collector bus</b>, a <b>reactive power</b> measurement at the generator terminal for each <b>generating unit</b>; or</p> <p>(iii) for a <b>generating unit</b> that is not part of an <b>aggregated generating facility</b>, the <b>reactive power</b> measurement at the generator terminal.</p> <p>“net real power” means for an <b>aggregated generating facility</b> or a <b>generating unit</b>, the sum of <b>real power</b> measurements at the high voltage side of all step-up transformers directly connected to the <b>transmission system</b>.</p>	<p><input type="checkbox"/> Support</p> <p><input type="checkbox"/> Support with language suggestions</p> <p><input type="checkbox"/> Oppose</p> <p><i>Insert comments, reason for position, and alternate proposal (if any).</i></p>	
<p><b>(b) Removals</b></p> <p>N/A</p>		
<p><b>(c) Amendments</b></p> <p>N/A</p>		