



Stakeholder Comparison Comment Rationale Matrix

2010-08-05

AESO AUTHORITATIVE DOCUMENT PROCESS

Alberta Reliability Standard – PER-003-AB-0 Operating Personnel Credentials

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]: 2010/08/05
Period of Consultation [yyyy/mm/dd]: 2010/08/05 through 2010/09/02
Comments From: TransAlta
Date [yyyy/mm/dd]: 2010/09/01

Contact: Neil Curtis
Phone: 403-705-5221
E-mail: ars_comments@aesocanada.com

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 PER-003-0 AND ALBERTA PER-003-AB-0

Operating Personnel Credentials

NERC PER-003-0	Alberta PER-003-AB-0	AESO Reason for Difference	Stakeholder Comments	AESO Replies
<p>Purpose Certification of operating personnel is necessary to ensure minimum competencies for operating a reliable Bulk Electric System.</p>	<p>Purpose The purpose of this reliability standard is to ensure that real-time operating personnel responsible for the reliable operation of the bulk electric system hold appropriate NERC certifications.</p>	<p>Clarified the purpose to align with the content of the reliability standard.</p>		
<p>Applicability 4.1. Transmission Operators. 4.2. Balancing Authorities. 4.3. Reliability Coordinators.</p>	<p>Applicability This reliability standard applies to the following:</p> <ul style="list-style-type: none"> the operator of a transmission facility that operates or directs the operation of any portion of the bulk electric system; and the ISO. <p>This reliability standard does not apply to:</p> <ul style="list-style-type: none"> the operator of a transmission facility whose only transmission facility(ies) on the bulk electric system is a radial line(s) connecting a generating unit to the interconnected electric system. 	<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>Insert comments, reason for position, and alternate proposal (if any).</i></p> <p>TransAlta agrees that this standard should not be applicable to generators that own generation interconnection facilities. We thank the AESO for that determination in the applicability section of this standard.</p> <p>As a suggestion, rather than use the term transmission facility in the section "The reliability standard does not apply to:" TransAlta thinks it would be clearer to use the definition Generator Interconnection Facility. We</p>	

COMPARISON BETWEEN NERC PER-003-0 AND ALBERTA PER-003-AB-0

Operating Personnel Credentials

NERC PER-003-0	Alberta PER-003-AB-0	AESO Reason for Difference	Stakeholder Comments	AESO Replies
			<p>believe it causes confusion throughout all of the Alberta Reliability Standards to refer to generation interconnection facilities as transmission. The following definition was provided in the NERC report "Final Report from the Ad Hoc Group for Generator Requirements at the Transmission Interface" dated November 16, 2009.</p> <p><i>Generator Interconnection Facility (NEW)</i> <i>Sole-use facility for the purpose of connecting the generating unit(s) to the transmission grid. In this regard, the sole-use facility only transmits power associated with the interconnecting generator, whether delivered to the grid or delivered to the generator for station service or auxiliary load, or delivered to meet cogeneration load requirements.</i></p> <p>General Comment:</p>	

COMPARISON BETWEEN NERC PER-003-0 AND ALBERTA PER-003-AB-0

Operating Personnel Credentials

NERC PER-003-0	Alberta PER-003-AB-0	AESO Reason for Difference	Stakeholder Comments	AESO Replies
			<p>- The term 'operator of a transmission facility' is not a recognized approved functional entity and therefore, there are currently no entities registered in this category. Before standards are approved with new categories of applicability, we believe those new categories should first go through stakeholder consultation and be approved as required. Subsequently, the AESO will need to change the functional entities in their registration criteria and have entities adjust their registration as required. Additionally, TransAlta would also like to understand how this new category of operator of a transmission facility maps with the legal owner of a transmission facility. TransAlta does not support approval of this standard until after these issues are addressed and parties have a chance to modify their registration if required.</p> <p>Any new definitions need to be discussed in a consultation process and be approved before being added to a standard.</p>	

COMPARISON BETWEEN NERC PER-003-0 AND ALBERTA PER-003-AB-0

Operating Personnel Credentials

NERC PER-003-0	Alberta PER-003-AB-0	AESO Reason for Difference	Stakeholder Comments	AESO Replies
			This standard should not be approved until it is clearly stated it does not apply to generators.	
<p>Effective Date April 1, 2005</p>	<p>Effective Date Three hundred and sixty five days (365) after the date the Commission 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 type="checkbox"/> Oppose</p> <p><i>Insert comments, reason for position, and alternate proposal (if any).</i></p>	
<p>R1. Each Transmission Operator, Balancing Authority, and Reliability Coordinator shall staff all operating positions that meet both of the following criteria with personnel that are NERC-certified for the applicable functions:</p> <p>R1.1. Positions that have the primary responsibility, either directly or through communications with others, for the real-time operation of the interconnected Bulk Electric System.</p> <p>R1.2. Positions directly responsible for complying with NERC standards.</p>	<p>R1 Except as contemplated in requirement R2, R3 and R4, each of the ISO and the operator of a transmission facility must staff real-time operating positions associated with the bulk electric system with persons who hold valid NERC certification as follows:</p> <ul style="list-style-type: none"> • in the case of the ISO, certification as either NERC Reliability Operator or NERC Balancing, Interchange and Transmission Operator. • In the case of an operator of a transmission facility, certification as any of NERC Reliability Operator, NERC Balancing, Interchange and 	<p><input type="checkbox"/> New <input checked="" type="checkbox"/> Amended <input type="checkbox"/> Deleted</p> <p>Amended for clarity and consistency.</p> <p>Specified certification requirements applicable to the AESO and operators of transmission facilities.</p> <p>The applicability section includes the NERC requirement R1.1 criteria.</p> <p>Moved exceptions from the items identified in measures M1.1 and M1.2 in the NERC reliability standard to this standard under requirements</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 PER-003-0 AND ALBERTA PER-003-AB-0

Operating Personnel Credentials

NERC PER-003-0	Alberta PER-003-AB-0	AESO Reason for Difference	Stakeholder Comments	AESO Replies
	<p>Transmission Operator or NERC Transmission Operator.</p> <p>R2 Each of the ISO and the operator of a transmission facility must ensure that all of its real-time operating trainees that do not hold valid NERC certification, as required in requirement R1, do not independently fill an operating position requiring valid NERC certification and are under the direct, continuous supervision and observation of a person who holds a valid NERC certification as identified in requirement R1.</p> <p>R3 During system emergency conditions when system control is transferred to a backup control center, each of the ISO and the operator of a transmission facility must ensure real-time operating positions associated with the bulk electric system are staffed with persons who hold valid NERC certification, as required in requirement R1, no later than four (4) hours after the transfer begins.</p>	<p>R2 and R3 to address acceptable situations where NERC certification of real-time operations staff is not required</p>		
	<p>R4 The operator of a transmission facility whose real-time operating</p>	<p><input checked="" type="checkbox"/> New</p>	<p><input type="checkbox"/> Support <input type="checkbox"/> Support with language</p>	

COMPARISON BETWEEN NERC PER-003-0 AND ALBERTA PER-003-AB-0

Operating Personnel Credentials

NERC PER-003-0	Alberta PER-003-AB-0	AESO Reason for Difference	Stakeholder Comments	AESO Replies
	<p>personnel do not hold NERC certification, as required in requirement R1, must only operate any portion of the bulk electric system after receiving approval for such operation or direction from a person who holds valid NERC certification as specified in requirement R1.</p>	<p><input type="checkbox"/> Amended <input type="checkbox"/> Deleted</p> <p>Alberta Variance: Added an exception to this standard under requirement R4 to address acceptable situations where NERC certification of real-time operation staff is not required after that staff has received approval from a person who holds valid NERC certification.</p>	<p>suggestions <input checked="" type="checkbox"/> Oppose</p> <p><i>Insert comments, reason for position, and alternate proposal (if any).</i></p> <p>R4 TransAlta suggests that the AESO clarify this requirement. It is not clear what 'only operate any portion' mean? What portion is the operator permitted to operate? How would compliance to this be assessed?</p>	
<p>M1. Each Transmission Operator, Balancing Authority, and Reliability Coordinator shall have NERC-certified operating personnel on shift in required positions at all times with the following exceptions:</p> <p>M1.1 While in training, an individual without the proper NERC certification credential may not independently fill a required operating position. Trainees may perform critical tasks only under the direct, continuous supervision and observation of the NERC-certified individual filling the required position.</p> <p>M1.2 During a real-time operating</p>	<p>MR1 Evidence exists that real-time operating positions associated with the bulk electric system are staffed with persons who hold valid NERC certification as specified in requirement R1.</p> <p>MR2 Evidence exists, such as shift schedules or operator logs, that real-time operating trainees do not independently fill an operating position and are supervised as identified in requirement R2.</p> <p>MR3 Where transfer to the backup control centre exceeded four (4) hours, evidence exists, such as disturbance reports, logs or voice</p>	<p><input type="checkbox"/> New <input checked="" type="checkbox"/> Amended <input type="checkbox"/> Deleted</p> <p>Amended to align with requirements R1, R2, R3 and R4.</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>MR3 TransAlta suggests the AESO clarify this measure: If 4 hours have been exceeded we are not sure what the measure is trying to assess. It seems that the measure should be ensuring that certified operators are staffing the position after 4 hours. We do not understand how disturbance</p>	

COMPARISON BETWEEN NERC PER-003-0 AND ALBERTA PER-003-AB-0

Operating Personnel Credentials

NERC PER-003-0	Alberta PER-003-AB-0	AESO Reason for Difference	Stakeholder Comments	AESO Replies
<p>emergency, the time when control is transferred from a primary control center to a backup control center shall not be included in the calculation of non-compliance. This time shall be limited to no more than four hours.</p>	<p>recordings, that the operator responsible for all real-time operation holds a valid NERC certification as specified in requirement R1.</p> <p>MR4 Evidence exists, such as voice recordings, that the operator of a transmission facility whose real-time operating personnel do not hold NERC certification, only operated a portion of the bulk electric system as specified in requirement R4.</p>		<p>reports would demonstrate that.</p> <p>MR4 Please see our comments under R4. We are not clear what a “portion of” refers to. Additionally, we are not clear how voice recordings would demonstrate that the operator only operated “a portion of”. We would also suggest that evidence could also include shift logs and perhaps should be added to the measure.</p>	
<p>Compliance To view the compliance section D of the NERC reliability standard follow this link: http://www.nerc.com/files/PER-003-0.pdf</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: http://www.aeso.ca/loadsettlement/17189.html.</p>		
<p>Regional Differences None identified.</p>	<p>None identified.</p>	<p>Not applicable in Alberta</p>		

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