



Stakeholder Comparison Comment Rationale Matrix

2010-07-15

AESO AUTHORITATIVE DOCUMENT PROCESS

Alberta Reliability Standard – PRC-007-AB-0 Assuring Consistency with Regional Underfrequency Load Shedding Program Requirements

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]: 2010/07/15
Period of Consultation [yyyy/mm/dd]: 2010/07/15 through 2010/08/15
Comments From: Capital Power Corporation
Date [yyyy/mm/dd]: 2010/08/17

Contact: Jerry Mossing
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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 PRC-007-0 AND ALBERTA PRC-007-AB-0
ASSURING CONSISTENCY WITH REGIONAL UNDERFREQUENCY LOAD SHEDDING PROGRAM REQUIREMENTS**

NERC PRC-007-0	Alberta PRC-007-AB-0	AESO Reason for Difference	Stakeholder Comments	AESO Replies
<p>Purpose Provide last resort System preservation measures by implementing an Under Frequency Load Shedding (UFLS) program.</p>	<p>Purpose The purpose of this reliability standard is to provide last resort system preservation measures by implementing an underfrequency load shedding program.</p>	<p>Clarified the purpose to align with the content of the reliability standard.</p>		
<p>Applicability 4.1. Transmission Owner required by its Regional Reliability Organization to own a UFLS program 4.2. Transmission Operator required by its Regional Reliability Organization to operate a UFLS program 4.3. Distribution Provider required by its Regional Reliability Organization to own or operate a UFLS program 4.4. Load-Serving Entity required by its Regional Reliability Organization to operate a UFLS program</p>	<p>Applicability This reliability standard applies to:</p> <ul style="list-style-type: none"> The legal owner of a transmission facility that owns or operates relays as part of the underfrequency load shedding program as published on the AESO website. A market participant that receives service under “Rate DTS” of the ISO tariff that has an obligation to shed load as part of the underfrequency load shedding program as published on the AESO website. The ISO. 	<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 type="checkbox"/> Oppose</p> <p>Capital Power is concerned that the applicability section refers to entities that were not listed in the “ARS Functional Model and Criteria for Registration” and therefore no market participants are registered as such.</p> <p>The sudden change in the applicability of the standards creates confusion and inconsistency across standards. Market participants must be able to assess with certainty whether or not a standard or group of standards applies or will apply to them. Changing the functional entities to which the standard applies without formal stakeholder</p>	

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			<p>process or consultation is inappropriate. The registration process should provide certainty to market participants regarding their compliance obligations and the AESO's audit process. Therefore if the AESO is proposing to change the registration criteria it must be done prior to the approval of any standards that contain revised applicability terms. Matters of applicability could potentially have a significant impact on our business and therefore Capital Power would greatly appreciate an opportunity to participate in stakeholder consultation to improve the reliability standards functional entity registration criteria.</p> <p>The applicability section of this standard provides additional information regarding applicability that is "as published on the AESO website". Without stating the exact location or name of the document that specifies the applicability of the standard, it is difficult to locate the document referenced and determine if the standard applies.</p>	

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			At a minimum, the name of the document should be stated so that market participants can closely monitor any changes made to the document that might affect the applicability of this standard.	
Effective Date April 1, 2005	Effective Date Ninety (90) days after the date of approval by the Commission .		<input type="checkbox"/> Support <input type="checkbox"/> Support with language suggestions <input type="checkbox"/> Oppose <i>Insert comments, reason for position, and alternate proposal (if any).</i>	
R1. The Transmission Owner and Distribution Provider, with a UFLS program (as required by its Regional Reliability Organization) shall ensure that its program is consistent with its Regional Reliability Organization's UFLS program requirements.	R1 The ISO must ensure its underfrequency load shedding program is consistent with the underfrequency load shedding program requirements of WECC .	<input type="checkbox"/> New <input checked="" type="checkbox"/> Amended <input type="checkbox"/> Deleted Amended for clarity and consistency. The Alberta Reliability Standards section of the AESO website, and in particular the section that contains this reliability standard, will contain reference to OPP 804 Off-Nominal Frequency Load Shedding and Restoration as a related authoritative document.	<input type="checkbox"/> Support <input type="checkbox"/> Support with language suggestions <input type="checkbox"/> Oppose <i>Insert comments, reason for position, and alternate proposal (if any).</i>	

<p>R2. The Transmission Owner, Transmission Operator, Distribution Provider, and Load-Serving Entity that owns or operates a UFLS program (as required by its Regional Reliability Organization) shall provide, and annually update, its underfrequency data as necessary for its Regional Reliability Organization to maintain and update a UFLS program database.</p>	<p>R2 Each legal owner of a transmission facility and each market participant receiving service under “Rate DTS” of the ISO tariff must annually update and provide to the ISO their underfrequency data.</p> <p>R3 The ISO must provide the underfrequency data it receives from market participants to WECC in accordance with reliability standard MOD-010&12-AB.</p>	<p><input type="checkbox"/> New <input checked="" type="checkbox"/> Amended <input type="checkbox"/> Deleted</p> <p>Amended to identify the responsible entities in Alberta and for clarity and consistency.</p> <p>Split the requirement for legal owner of a transmission facility and market participants to provide data to the ISO and for the ISO to provide data to the WECC.</p>	<p><input type="checkbox"/> Support <input type="checkbox"/> Support with language suggestions <input checked="" type="checkbox"/> Oppose</p> <p>Capital Power does not support this standard as written because it does not provide any details as to what underfrequency data is required and how the AESO would like it presented.</p> <p>Capital Power is supportive of the AESO’s Transition of Authoritative Document (TOAD) objectives. One of the objectives of the AESO’s TOAD project was to eliminate overlap among authoritative documents and create market participant requirements and obligations that provide clarity, transparency and certainty to market participants. A culture of compliance is necessary to ensure the reliable operation of the system. If a standard does not clearly outline the obligations market participants may not be able to ensure compliance.</p> <p>Is it the AESO’s intent to rely on OPP 804 to provide this clarity? If so, we have a number of concerns:</p> <ul style="list-style-type: none"> • OPP 804 does not specify 	
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			<p>any requirements of market participants receiving service under “Rate DTS” or transmission facility owners so it is not clear what will be required for this standard.</p> <ul style="list-style-type: none"> To the extent the requirements are contained in OPP 804, this creates a duplication of requirements. We have consistently stated that Market Participants should not be at risk of being found non-compliant with multiple authoritative documents for a single action or inaction. <p>Capital Power has committed resources to participate in the Operations Working Group to identify such issues early in the drafting process. When this standard was discussed at the working group prior to public consultation, these issues were raised by Capital Power and other participants. We have also provided comments on this issue in consultation on CIP-001 and OPP 808, and VAR-002-WECC-AB-1, VAR-501-WECC-AB-1 and OPP 1305, and MOD-010&012-</p>	
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			<p>AB-0 and OPP 1306.</p> <p>If it's the AESO's intention to reference the criteria in OPP 804 for this standard, we do not support this approach. Since it is possible to deviate from the NERC version of the standards where justified, we suggest two alternate solutions to avoid the duplication of requirements across multiple authoritative documents:</p> <ul style="list-style-type: none"> • Transfer the relevant points from OPP 804 if they detail the obligations into this standard as bullet points of R2 and subsequently remove them from OPP 804. • Alternatively, the AESO could remove R2 from this standard and indicate that the requirement is already contained in an existing OPP. In this case, OPP 804 would remain in place. <p>To the extent the AESO would like to utilize a reference table to direct market participants to supporting information documents or authoritative documents covering related subject matter, provided that the reference is not included in the standard itself, we are supportive of the AESO providing</p>	
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			more clarity to better enable compliance.	
R3. The Transmission Owner and Distribution Provider that owns a UFLS program (as required by its Regional Reliability Organization) shall provide its documentation of that UFLS program to its Regional Reliability Organization on request (30 calendar days).	R4 The ISO must provide the underfrequency load shedding program required in requirement R1 to WECC within thirty (30) days of receiving WECC's written request.	<input type="checkbox"/> New <input checked="" type="checkbox"/> Amended <input type="checkbox"/> Deleted Amended to identify the responsible entities in Alberta and for clarity and consistency. The Alberta Reliability Standards section of the AESO website, and in particular the section that contains this reliability standard, will contain reference to OPP 804 Off-Nominal Frequency Load Shedding and Restoration as a related authoritative document.	<input type="checkbox"/> Support <input type="checkbox"/> Support with language suggestions <input type="checkbox"/> Oppose <i>Insert comments, reason for position, and alternate proposal (if any).</i>	
M1. Each Transmission Owner's and Distribution Provider's UFLS program shall be consistent with its associated Regional Reliability Organization's UFLS program requirements.	MR1 The underfrequency load shedding program is consistent with the underfrequency load shedding program requirements of WECC .	<input type="checkbox"/> New <input checked="" type="checkbox"/> Amended <input type="checkbox"/> Deleted Measure amended to align with requirement R1.	<input type="checkbox"/> Support <input type="checkbox"/> Support with language suggestions <input type="checkbox"/> Oppose <i>Insert comments, reason for position, and alternate proposal (if any).</i>	
	MR2 Evidence exists that each legal owner and market participant annually updated their underfrequency data and provided it to the ISO as specified in requirement R2.	<input checked="" type="checkbox"/> New <input type="checkbox"/> Amended <input type="checkbox"/> Deleted Measure added to align with requirement R2 and R3.	<input type="checkbox"/> Support <input type="checkbox"/> Support with language suggestions <input type="checkbox"/> Oppose <i>Insert comments, reason for position, and alternate proposal (if any).</i>	

	MR3 Evidence exists that the ISO provided the underfrequency data to WECC as specified in requirement R3.		<i>any).</i>	
M2. Each Transmission Owner, Transmission Operator, Distribution Provider, and Load-Serving Entity that owns or operates a UFLS program shall have evidence that it provided its associated Regional Reliability Organization and NERC with documentation of the UFLS program on request (30 calendar days).	MR4 Evidence exists that the ISO provided the underfrequency load shedding program to WECC as specified in requirement R4.	<input type="checkbox"/> New <input checked="" type="checkbox"/> Amended <input type="checkbox"/> Deleted Measure amended to align with requirement R4.	<input type="checkbox"/> Support <input type="checkbox"/> Support with language suggestions <input type="checkbox"/> Oppose <i>Insert comments, reason for position, and alternate proposal (if any).</i>	
Compliance To view the compliance section D of the NERC reliability standard follow this link: http://www.nerc.com/files/PRC-007-0.pdf		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 .		
Regional Differences None identified.	None identified.	Not applicable in Alberta		

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

Definitions	Comments	Rationale and/or Alternate Proposal
<p>(c) Amendments</p> <p>N/A</p>		