



**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: Suncor Energy  
Date [yyyy/mm/dd]: 2010/08/16

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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><b>Purpose</b> Provide last resort System preservation measures by implementing an Under Frequency Load Shedding (UFLS) program.</p>	<p><b>Purpose</b> The purpose of this <b>reliability standard</b> is to provide last resort <b>system</b> preservation measures by implementing an <b>underfrequency load shedding</b> program.</p>	<p>Clarified the purpose to align with the content of the reliability standard.</p>		
<p><b>Applicability</b> 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><b>Applicability</b> This <b>reliability standard</b> applies to:</p> <ul style="list-style-type: none"> <li>The <b>legal owner</b> of a <b>transmission facility</b> that owns or operates relays as part of the <b>underfrequency load shedding</b> program as published on the AESO website.</li> <li>A <b>market participant</b> that receives service under “Rate DTS” of the <b>ISO tariff</b> that has an obligation to shed load as part of the <b>underfrequency load shedding</b> program as published on the AESO website.</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 recommends that the information published on the AESO website should be captured in the body of this binding Standard for clarity.</i></p>	
<p><b>Effective Date</b> April 1, 2005</p>	<p><b>Effective Date</b> Ninety (90) <b>days</b> after the date of approval by the <b>Commission</b>.</p>		<p><input type="checkbox"/> Support <input type="checkbox"/> Support with language suggestions <input type="checkbox"/> Oppose</p>	

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			<i>Insert comments, reason for position, and alternate proposal (if any).</i>	
<p><b>R1.</b> 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.</p>	<p><b>R1</b> The <b>ISO</b> must ensure its <b>underfrequency load shedding</b> program is consistent with the <b>underfrequency load shedding</b> program requirements of <b>WECC</b>.</p>	<p><input type="checkbox"/> New  <input checked="" type="checkbox"/> Amended  <input type="checkbox"/> Deleted</p> <p>Amended for clarity and consistency.</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 OPP 804 Off-Nominal Frequency Load Shedding and Restoration as a related authoritative document.</p>	<p><input type="checkbox"/> Support  <input type="checkbox"/> Support with language suggestions  <input checked="" type="checkbox"/> Oppose</p> <p><i>The requirements and criteria within OPP 804 should be captured within the body of this Standard to provide clarity on the binding requirements applicable to this Standard.</i></p>	
<p><b>R2.</b> 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><b>R2</b> Each <b>legal owner</b> of a <b>transmission facility</b> and each <b>market participant</b> receiving service under “Rate DTS” of the <b>ISO tariff</b> must annually update and provide to the <b>ISO</b> their <b>underfrequency</b> data.</p> <p><b>R3</b> The <b>ISO</b> must provide the <b>underfrequency</b> data it receives from <b>market participants</b> to <b>WECC</b> in accordance with</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</p>	<p><input type="checkbox"/> Support  <input checked="" type="checkbox"/> Support with language suggestions / clarity  <input type="checkbox"/> Oppose</p> <p><i>Is R.2 only applicable to DTS customers who have already been identified to provide underfrequency data, as identified in Bullet 2 of the Applicability section? Please clarify.</i></p>	

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	reliability standard MOD-010&12-AB.	and for the ISO to provide data to the WECC.		
<p><b>R3.</b> 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).</p>	<p><b>R4</b> The ISO must provide the <b>underfrequency load shedding</b> program required in requirement R1 to <b>WECC</b> within thirty (30) <b>days</b> of receiving <b>WECC's</b> written request.</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>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.</p>	<p><input checked="" type="checkbox"/> Support  <input type="checkbox"/> Support with language suggestions  <input type="checkbox"/> Oppose</p>	
<p><b>M1.</b> Each Transmission Owner's and Distribution Provider's UFLS program shall be consistent with its associated Regional Reliability Organization's UFLS program requirements.</p>	<p><b>MR1</b> The <b>underfrequency load shedding</b> program is consistent with the <b>underfrequency load shedding</b> program requirements of <b>WECC</b>.</p>	<p><input type="checkbox"/> New  <input checked="" type="checkbox"/> Amended  <input type="checkbox"/> Deleted</p> <p>Measure amended to align with requirement R1.</p>	<p><input checked="" type="checkbox"/> Support  <input type="checkbox"/> Support with language suggestions  <input type="checkbox"/> Oppose</p>	
	<p><b>MR2</b> Evidence exists that each <b>legal owner</b> and <b>market participant</b> annually updated their <b>underfrequency</b> data and</p>	<p><input checked="" type="checkbox"/> New  <input type="checkbox"/> Amended  <input type="checkbox"/> Deleted</p>	<p><input type="checkbox"/> Support  <input checked="" type="checkbox"/> Support with language suggestions / clarity  <input type="checkbox"/> Oppose</p>	

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	<p>provided it to the <b>ISO</b> as specified in requirement R2.</p> <p><b>MR3</b> Evidence exists that the <b>ISO</b> provided the <b>underfrequency</b> data to <b>WECC</b> as specified in requirement R3.</p>	<p>Measure added to align with requirement R2 and R3.</p>	<p><i>Is R.2 only applicable to DTS customers who have already been identified to provide underfrequency data, as identified in Bullet 2 of the Applicability section? Please clarify.</i></p>	
<p><b>M2.</b> 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).</p>	<p><b>MR4</b> Evidence exists that the <b>ISO</b> provided the <b>underfrequency load shedding</b> program to <b>WECC</b> as specified in requirement R4.</p>	<p><input type="checkbox"/> New  <input checked="" type="checkbox"/> Amended  <input type="checkbox"/> Deleted</p> <p>Measure amended to align with requirement R4.</p>	<p><input checked="" type="checkbox"/> Support  <input type="checkbox"/> Support with language suggestions  <input type="checkbox"/> Oppose</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/PRC-007-0.pdf">http://www.nerc.com/files/PRC-007-0.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/17189.html">http://www.aeso.ca/loadsettlement/17189.html</a>.</p>		
<p><b>Regional Differences</b>  None identified.</p>	<p>None identified.</p>	<p>Not applicable in Alberta</p>		

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