



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: _____
Date [yyyy/mm/dd]: _____

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 checked="" type="checkbox"/> Oppose</p> <p><i>Insert comments, reason for position, and alternate proposal (if any).</i></p> <p>The term ‘legal owner of a transmission facility’ is not a defined functional entity in the AESO’s Alberta Reliability Standards Functional Model and Criteria for Registration. There are therefore no entities currently registered in this category and without the criteria for registration defined it is impossible to determine who should be responsible to comply to this standard. Before any standard is approved with new functional entities the AESO should first</p>	

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			<p>ensure that the functional model is updated and communicated to stakeholders and provide sufficient time to allow entities to adjust their registration as required. Additionally, TransAlta would also like to understand how this new category of legal owner of a transmission facility corresponds to the proposed functional entity of operator of a transmission facility, Previously the functional entity of Transmission Facility Owner covered both owner and operator of a transmission facility. These two new functional entities are a significant change and need to be vetted and adopted before any standards that incorporate them are approved.</p> <p>TransAlta is concerned that the use of the words 'as published on the AESO website' does not clearly identify the location or the document. TransAlta suggests that the specific document or reference be added here.</p>	

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<p>Effective Date April 1, 2005</p>	<p>Effective Date Ninety (90) days after the date of approval by the Commission.</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>TransAlta is unable to comment on a proper effective date as we are still not clear on exactly what this standard requires (see comments under R2)</p>	
<p>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.</p>	<p>R1 The ISO must ensure its underfrequency load shedding program is consistent with the underfrequency load shedding program requirements of WECC.</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 type="checkbox"/> Oppose</p> <p><i>Insert comments, reason for position, and alternate proposal (if any).</i></p> <p>TransAlta requests an explanation on 'related authoritative documents'. What is the relationship between the related authoritative document and this standard? If it is the AESO's intent that OPP 804 be used to define additional criteria that must be</p>	

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			<p>followed in order to comply with this standard, then those criteria should be embedded within the reliability standard and not simply referenced under the section "AESO Reason for Difference" or via location on the AESO's web page. In order to manage compliance to the reliability standards it is imperative that all requirements are clearly documented within the standard.</p>	
<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><i>Insert comments, reason for position, and alternate proposal (if any).</i></p> <p>R2-The requirement as written provides no guidance on what underfrequency data must be provided to the ISO. TransAlta also raised this concern in the Operations Working Group. It appears that the AESO may be relying on OPP 804 for the description of the underfrequency data to be provided. (reference R1 AESO Reason for Difference)) If</p>	

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			<p>that is the case, OPP 804 covers more than just the provision of data, and additionally has no specific requirements for either legal owners of transmission facilities or market participants receiving service under 'Rate DTS' making it impossible to determine what is required.</p> <p>The standard should clearly indicate within the standard what underfrequency data must be provided to the ISO.</p> <p>In principle, TransAlta does not support the use of references to OPPs or other authoritative documents within the reliability standards. This creates a potential situation of double jeopardy, or the potential to be fined twice for the same violation.</p>	
<p>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).</p>	<p>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.</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</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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		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>M1. 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>MR1 The underfrequency load shedding program is consistent with the underfrequency load shedding program requirements of WECC.</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 type="checkbox"/> Support <input type="checkbox"/> Support with language suggestions <input checked="" type="checkbox"/> Oppose</p> <p>A measure of "consistent with" provides no guidance as to how compliance with be assessed.</p>	
	<p>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.</p> <p>MR3 Evidence exists that the ISO provided the underfrequency data to WECC as specified in requirement R3.</p>	<p><input checked="" type="checkbox"/> New <input type="checkbox"/> Amended <input type="checkbox"/> Deleted</p> <p>Measure added to align with requirement R2 and R3.</p>	<p><input type="checkbox"/> Support <input type="checkbox"/> Support with language suggestions <input checked="" type="checkbox"/> Oppose</p> <p>As discussed in TransAlta's comments for R2 above, there is no clarity as to what underfrequency data is required.</p>	
<p>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</p>	<p>MR4 Evidence exists that the ISO provided the underfrequency load shedding program to WECC as specified in requirement R4.</p>	<p><input type="checkbox"/> New <input checked="" type="checkbox"/> Amended <input type="checkbox"/> Deleted</p>	<p><input type="checkbox"/> Support <input type="checkbox"/> Support with language suggestions <input type="checkbox"/> Oppose</p>	

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associated Regional Reliability Organization and NERC with documentation of the UFLS program on request (30 calendar days).		Measure amended to align with requirement R4.	<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
<p>(a) New NA</p>	<p>- The bold term 'legal owner of a transmission facility' is not a defined term and as such the standard should not be approved until the term is clearly defined in an authoritative document and all necessary changes made in places such as the AESO's. Alberta Reliability Standards Functional Model and Criteria for Registration</p>	
<p>(b) Removals N/A</p>		
<p>(c) Amendments N/A</p>		