



Stakeholder Comparison Comment Rationale Matrix

2010-08-17

AESO AUTHORITATIVE DOCUMENT PROCESS

Alberta Reliability Standard – PRC-008-AB-0 Underfrequency Load Shedding Equipment Maintenance Programs

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.

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|---|---|
| Date of Request for Comment [yyyy/mm/dd]: <u>2010/08/17</u> Period of Consultation [yyyy/mm/dd]: <u>2010/08/17</u> through <u>2010/09/17</u> Comments From: <u>Altalink Management Ltd.</u> Date [yyyy/mm/dd]: <u>2010/09/17</u> | Contact: <u>Karina Muniz</u> Phone: <u>403-267-5963</u> E-mail: <u>karina.muniz@altalink.ca</u> |
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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-008-0 AND ALBERTA PRC-008-AB-0
UNDERFREQUENCY LOAD SHEDDING EQUIPMENT MAINTENANCE PROGRAMS**

| NERC PRC-008-0 | Alberta PRC-008-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 have a UFLS program 4.2. Distribution Provider required by its Regional Reliability Organization to have 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 who owns equipment as part of an underfrequency load shedding program; and a market participant receiving service under <i>Rate DTS</i> who has an obligation to shed load as part of an underfrequency load shedding program. | <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>Currently the UFLS program is implemented through OPP 804 Off-Nominal Frequency Load Shedding and Restoration. 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 as a related authoritative document.</p> | <p><input type="checkbox"/> Support <input checked="" type="checkbox"/> Support with language suggestions <input type="checkbox"/> Oppose</p> <p>General Comment: <i>- The term 'legal owner 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.</i></p> <p><i>Subsequently, the AESO will need to change the functional entities in their registration criteria and have entities adjust</i></p> | |

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| | | | <p><i>their registration as required. Additionally, AltaLink would also like to understand how the definition of 'legal owner' maps with the definition of TFO. AltaLink does not support approval of this standard until after these issues are addressed and parties have a chance to modify their registration if required.</i></p> <p><i>Any new definitions need to be discussed in a consultation process and be approved before being added to a standard.</i></p> | |
| <p>Effective Date April 1, 2005</p> | <p>Effective Date One hundred and eighty (180) days after the date the Commission approves it.</p> | | <p><input checked="" type="checkbox"/> Support <input type="checkbox"/> Support with language suggestions <input type="checkbox"/> Oppose</p> <p><i>Altalink has no comment on ISO requirements</i></p> | |
| <p>R1. The Transmission Owner and Distribution Provider with a UFLS program (as required by its Regional Reliability Organization) shall have a UFLS equipment maintenance and</p> | <p>R1 Each legal owner and market participant must have an underfrequency load shedding equipment maintenance and testing program that identifies</p> | <p><input type="checkbox"/> New <input checked="" type="checkbox"/> Amended <input type="checkbox"/> Deleted</p> | <p><input checked="" type="checkbox"/> Support <input type="checkbox"/> Support with language suggestions <input type="checkbox"/> Oppose</p> | |

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| testing program in place. This UFLS equipment maintenance and testing program shall include UFLS equipment identification, the schedule for UFLS equipment testing, and the schedule for UFLS equipment maintenance. | underfrequency load shedding equipment and includes schedule(s) for maintenance and testing. | Amended for clarity and consistency. | <i>Altalink has no comment on ISO requirements</i> | |
| | R2. Subject to requirement R3, each legal owner and market participant must identify the date underfrequency load shedding equipment, identified in its underfrequency load shedding equipment maintenance and testing program, was last tested and maintained. | <input checked="" type="checkbox"/> New <input type="checkbox"/> Amended <input type="checkbox"/> Deleted Alberta Variance: Requirement R2 was added to identify the date when UFLS equipment was last tested and maintained. This will establish a start date for the maintenance and testing intervals. Where the last tested date cannot be identified, the corresponding UFLS equipment are required to be tested over a three year period in accordance with new Alberta requirement R3. | <input checked="" type="checkbox"/> Support <input type="checkbox"/> Support with language suggestions <input type="checkbox"/> Oppose <i>Altalink has no comment on ISO requirements</i> | |
| | R3 Each legal owner and market participant that cannot identify the date that underfrequency load shedding equipment was last tested in their program, as required in requirement R2, must test any such equipment and record the date of such testing within thirty six (36) months of the effective | <input checked="" type="checkbox"/> New <input type="checkbox"/> Amended <input type="checkbox"/> Deleted Alberta Variance: Added requirement R3 to allow participants time to test those devices where test records (or other evidence) is not available, as | <input type="checkbox"/> Support <input checked="" type="checkbox"/> Support with language suggestions <input type="checkbox"/> Oppose <i>As a general comment, Altalink is concerned with the prescriptive approach of the 1/3 requirement as from an auditability requirement it will</i> | |

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| | <p>date of this reliability standard, subject to the following:</p> <ul style="list-style-type: none"> • must test, and record the date tested, a minimum of one third (1/3) of its underfrequency load shedding equipment that does not have a last tested date within twelve (12) months of the effective date of this reliability standard; • must test, and record the date tested, a minimum of two thirds (2/3) of its underfrequency load shedding equipment that does not have a last tested date within twenty four (24) months of the effective date of this reliability standard | <p>required in R2.</p> | <p><i>have no flexibility to allow for potential optimizations to the timing of the testing within the three year period.</i></p> <p><i>We understand that the AESO is trying to ensure progress on the testing during this 3 year period. As an alternative suggestion the requirement could instead be reworded to provide status reports to the AESO annually. The report would provide visibility to the AESO of which relays do and do not have records, and the scheduled test dates.</i></p> | |
| <p>R2. The Transmission Owner and Distribution Provider with a UFLS program (as required by its Regional Reliability Organization) shall implement its UFLS equipment maintenance and testing program and shall provide UFLS maintenance and testing program results to its Regional Reliability Organization and NERC on</p> | <p>R4 Each legal owner and market participant must, as of the effective date of this reliability standard, implement its underfrequency load shedding equipment maintenance and testing program required by requirement R1.</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><input checked="" type="checkbox"/> Support <input type="checkbox"/> Support with language suggestions <input type="checkbox"/> Oppose</p> <p><i>See legal owner definition comments under R1.</i></p> | |

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| request (within 30 calendar days). | R5 Each legal owner and market participant must provide documentation of the existence and implementation of its underfrequency load shedding equipment maintenance and testing program required in requirement R1 within thirty (30) days of receiving a written request from the ISO . | NERC requirement has been split into two requirements to add clarity. Alberta Variance: In Alberta requirement R5, participants will provide documentation to the AESO as the compliance monitor for legal owners of transmission facilities and market participants. | | |
| M1. Each Transmission Owner's and Distribution Provider's UFLS equipment maintenance and testing program contains the elements specified in Reliability Standard PRC-008-0_R1. | MR1 Documentation of underfrequency load shedding equipment maintenance and testing program exists and includes elements as specified in requirement R1. | <input type="checkbox"/> New <input checked="" type="checkbox"/> Amended <input type="checkbox"/> Deleted Alberta measure amended to align with requirement R1. | <input checked="" type="checkbox"/> Support <input type="checkbox"/> Support with language suggestions <input type="checkbox"/> Oppose <i>Altalink has no comment on ISO requirements</i> | |
| M2. Each Transmission Owner and Distribution Provider shall have evidence that it provided the results of its UFLS equipment maintenance and testing program's implementation to its Regional Reliability Organization and NERC on request (within 30 calendar days). | MR2 Evidence exists of the date underfrequency load shedding equipment was last tested and maintained or where the date is unknown, measure MR3 applies. MR3 For underfrequency load shedding equipment without a date last tested as identified in requirement R2, evidence exists that there is a testing plan and the legal owner or market participant , as applicable, has implemented it as specified in | <input checked="" type="checkbox"/> New <input type="checkbox"/> Amended <input type="checkbox"/> Deleted Alberta measure added to align with requirement R2 and R5. | <input checked="" type="checkbox"/> Support <input type="checkbox"/> Support with language suggestions <input type="checkbox"/> Oppose <i>Altalink has no comment on ISO requirements</i> | |

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| | <p>requirement R3.</p> <p>MR4: All records of underfrequency load shedding equipment maintenance and testing, created after the effective date of this reliability standard exist and are complete, accurate and consistent with the maintenance and testing program as required in requirement R1.</p> <p>MR5: Confirmation that the legal owner or the market participant, as applicable, provided documentation of the existence and implementation of the underfrequency load shedding equipment maintenance and testing program within the timelines specified in requirement R3.</p> | | | |

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| Compliance To view the compliance section D of the NERC reliability standard follow this link: http://www.nerc.com/files/PRC-008-0.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 | | |
| (c) Amendments N/A | | |