



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.

Date of Request for Comment [yyyy/mm/dd]:	2010/08/17			Contact:	Jerry Mossing
Period of Consultation [yyyy/mm/dd]:	2010/08/17	through	2010/09/17	Phone:	403-539-2496
Comments From:	TransAlta			E-mail:	ars_comments@aeso.ca
Date [yyyy/mm/dd]:	2010/09/16				

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 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 or who the AESO is planning to</p>	

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			<p>monitor for compliance. Before any standard is approved with new functional entities, the AESO should first ensure that the functional model is consulted upon with stakeholders, updated and communicated to stakeholders. , Also to provide sufficient time for entitles to reach agreement with their commercial counterparties and to adjust their registration as required.</p> <p>Previously the definition of Transmission Facility Owner covered both owner and operator of a transmission facility. TransAlta also requests the AESO provide explanation as to how this new definition of legal owner of a transmission facility corresponds to the proposed new definition of operator of a transmission facility. The assignment of the TFO standards into “owner” and “operator” categories has taken place since these standards were last discussed</p>	

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			<p>in the working groups or seen at the ARC. This categorization is extremely important and must be done correctly. These two new functional entities/definitions are significant changes and need to be vetted and adopted before any standards that incorporate them are approved.</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 somehow to define additional criteria that must be 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</p>	

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			all requirements are clearly documented within the standard.	

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<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 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>General Concern A review of the AESO's implementation schedule shows that given the large volume of standards that are going through stakeholder comment right now it is very possible that the result is a large number of standards approved at the same time all with a 180 day effective date. (ie. the same effective date) While an effective date of 180 days may work for one standard, it certainly will not work for a large number that may all fall on the same date. TransAlta requests the AESO develop a reasonable and certain schedule that ensures that effective dates are set up looking at the program as a</p>	

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			<p>whole, not just a standard at a time. The effective date should not be approved without this schedule being available so a proper assessment can be made as to the reasonableness of the effective date.</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 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.</p>	<p>R1 Each legal owner and market participant must have an underfrequency load shedding equipment maintenance and testing program that identifies underfrequency load shedding equipment and includes schedule(s) for maintenance and testing.</p>	<p> <input type="checkbox"/> New <input checked="" type="checkbox"/> Amended <input type="checkbox"/> Deleted </p> <p>Amended for clarity and consistency.</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>R1 The definition of legal owner, as defined in the ISO Authoritative Document Consolidated Glossary is: “means the person who owns electric industry property including any one or more of:(i) a generating unit;(ii) any aggregated generating facilities;(iii) a transmission facility;(iv) an electric distribution system;(v) an industrial system that has been designated as such by the Commission; and (vi) a load</p>	

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			<p>facility with system access service under subsection 101(2) of the Act. “ Please specify legal owner of which electric industry property? Is this intended to be legal owner of a transmission facility? Without this clarification it is not clear if this applies to legal owners of all types of property including generating units, aggregated generating units etc.,</p> <p>R1 TransAlta recommends replacing the words ‘schedule(s) for maintenance and testing’ with the words ‘the schedule for UFLS equipment maintenance and testing’ to improve clarity.</p>	
	<p>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.</p>	<p><input checked="" type="checkbox"/> New <input type="checkbox"/> Amended <input type="checkbox"/> Deleted</p> <p>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.</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>R3 See comments in R1 above regarding the use of the</p>	

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		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.	term legal owner.	
	<p>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 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 	<p><input checked="" type="checkbox"/> New <input type="checkbox"/> Amended <input type="checkbox"/> Deleted</p> <p>Alberta Variance: Added requirement R3 to allow participants time to test those devices where test records (or other evidence) is not available, as required in R2.</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>R3 See comment in R1 above regarding the use of the term legal owner.</p>	

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	<p>does not have a last tested date within twenty four (24) months of the effective date of this reliability standard</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 request (within 30 calendar days).</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>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.</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>NERC requirement has been split into two requirements to add clarity.</p> <p>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.</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>R4 See comment in R1 above regarding the use of the term legal owner</p> <p>R5 See comment in R1 above regarding the use of the term legal owner</p> <p>R5 It appears that the requirements as specified in the ARS have a different intent than those of the NERC requirement. The NERC requirement requires the applicable entity to provide UFLS maintenance and testing program “results” upon</p>	

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			<p>request. We understand that “results” means the results of the test itself, or the testing data. The wording of the ARS version requires the provision of documentation of the existence and implementation of the maintenance and testing program. Documentation of existence and implementation could simply be a copy of the program and the work orders to demonstrate that the work was complete. It would not, in our opinion, constitute the actual test results.</p> <p>TransAlta requests the AESO explain the reason for difference from the NERC standard, or alternatively clarify the wording of this requirement to better reflect that the request would be for results.</p> <p>R5 TransAlta requests an explanation as to what the “documentation of existence” means? The presence of the document itself is by definition its existence. As written would this require further</p>	

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			<p>documentation that the document exists? What form would such evidence take? Again, the requirement as set forth in the NERC standard is much clearer and should be used.</p> <p>If the requirement is instead to provide the results of the program (see comments in R5 above), then this measure will need to be rewritten.</p>	
<p>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.</p>	<p>MR1 Documentation of underfrequency load shedding equipment maintenance and testing program exists and includes elements as specified in requirement R1.</p>	<p><input type="checkbox"/> New <input checked="" type="checkbox"/> Amended <input type="checkbox"/> Deleted</p> <p>Alberta measure amended to align with requirement R1.</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>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).</p>	<p>MR2 Evidence exists of the date underfrequency load shedding equipment was last tested and maintained or where the date is unknown, measure MR3 applies.</p> <p>MR3 For underfrequency load shedding equipment without a</p>	<p><input checked="" type="checkbox"/> New <input type="checkbox"/> Amended <input type="checkbox"/> Deleted</p> <p>Alberta measure added to align with requirement R2 and R5.</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>	

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	<p>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 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>		<p>MR3 & MR5 See comment in R1 above regarding the use of the term legal owner</p> <p>MR5 TransAlta disagrees with the use of the word “confirmation”. If confirmations are to be used in the measures of the standards they should only be used to confirm receipt of data by the AESO. TransAlta believes confirmations are being used incorrectly in these measures as it would have the registered entity seek confirmation from the AESO that the program existed and was implemented, not a confirmation of receipt of data from the AESO. TransAlta suggests that the confirmation of the “existence” and the implementation of the program within the timelines defined would be done during the audit. By requiring this confirmation from the AESO the audit function is actually being performed in advance of the audit. Additionally, if the AESO were to apply this</p>	

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			<p>requirement for a confirmation, how often would the market participant require the confirmation? With every test of every ULS equipment, upon any change to its maintenance plan, annually etc.? The need for confirmation should be removed from this measure. In TransAlta's opinion this is very burdensome and unnecessary.</p> <p>MR5 TransAlta does not understand what documentation of existence means? The presence of the document itself is by definition its existence. As written this would require further documentation that the document exists. Again, the requirement as set forth in the NERC standard is much clearer and should be used.</p>	
<p>Compliance To view the compliance section D of the NERC reliability standard follow this link:</p>		<p>The Alberta reliability standards do not contain a compliance section. Compliance with all Alberta reliability</p>		

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http://www.nerc.com/files/PRC-008-0.pdf		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		