



Stakeholder Comparison Comment Rationale Matrix

2010-07-22

AESO AUTHORITATIVE DOCUMENT PROCESS

Alberta Reliability Standard – PRC-015-AB-0 Remedial Action Scheme Data and Documentation

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]: <u>2010/07/22</u>	Contact: <u>Karina Muniz</u>
Period of Consultation [yyyy/mm/dd]: <u>2010/07/22</u> through <u>2010/08/27</u>	Phone: <u>403-267-5963</u>
Comments From: <u>AltaLink Management Ltd.</u>	E-mail: <u>karina.muniz@altalink.ca</u>
Date [yyyy/mm/dd]: <u>2010/08/27</u>	

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-015-0 AND ALBERTA PRC-015-AB-0
REMEDIAL ACTION SCHEME DATA AND DOCUMENTATION**

NERC PRC-015-0	Alberta PRC-015-AB-0	AESO Reason for Difference	Stakeholder Comments	AESO Replies
<p>Purpose To ensure that all Special Protection Systems (SPS) are properly designed, meet performance requirements, and are coordinated with other protection systems. To ensure that maintenance and testing programs are developed and misoperations are analyzed and corrected.</p>	<p>Purpose The purpose of this reliability standard is to ensure that all RASs are properly designed, meet performance requirements, are documented and coordinated with other protection systems.</p>	<p>Clarified the purpose to align with the content of the reliability standard.</p>		
<p>Applicability 4.1. Transmission Owner that owns an SPS 4.2. Generator Owner that owns an SPS 4.3. Distribution Provider that owns an SPS</p>	<p>Applicability This reliability standard applies to:</p> <ul style="list-style-type: none"> TFOs, GFOs, and WOs who are designated by the ISO as an owner of components of a RAS in the ISO RAS database as published on the AESO website, and as may be amended from time to time by the AESO on notice to market participants 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>The Alberta Reliability Standards section of the AESO website, and in particular the section that contains this reliability standard, will contain reference to the ISO RAS database. The ISO RAS database is currently available on the AESO website, under current Alberta Reliability Standard PRC-001-AB-1 Protection System Coordination.</p>	<p><input type="checkbox"/> Support <input checked="" type="checkbox"/> Support with language suggestions <input type="checkbox"/> Oppose</p> <p><i>AltaLink recommends that the wording be adjusted to outline or reference a process for revising the list, as per R1, that includes a stakeholder consultation activity and adds an appropriate effective date to allow TFOs and GFOs enough time to adopt any changes in requirements or revisions to the referenced list.</i></p>	
<p>Effective Date</p>	<p>Effective Date</p>			

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April 1, 2005	Ninety (90) days after the date of approval by the Commission.	To allow a reasonable amount of time for Alberta entities to implement this Alberta Reliability Standard.	<input type="checkbox"/> Support <input type="checkbox"/> Support with language suggestions <input checked="" type="checkbox"/> Oppose <i>AltaLink recommends the effective date to be at least 365 calendar days because a number of the RAS involve significant coordination between different entities and it will take considerable effort to develop the required documentation and testing programs.</i> <i>In addition, AltaLink recommends that the RAS classification criteria and list are appropriately vetted through stakeholder consultation before this standards gets filed to the Commission.</i> <i>Altalink also recommends a staged implementation such that the WECC RAS are completed prior to Alberta RAS and then followed by Safety</i>	

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			<i>nets and Local Area Protection Schemes (LAPS).</i>	
<p>R1. The Transmission Owner, Generator Owner, and Distribution Provider that owns an SPS shall maintain a list of and provide data for existing and proposed SPSs as specified in Reliability Standard PRC-013-0_R1.</p>	<p>R1 TFOs, GFOs, and WOs must each provide data for RAS pursuant to a written request by the ISO. TFOs, GFOs, and WOs must provide such data within the timeframe specified in such written request, but will be not obligated to provide it sooner than thirty (30) days after receipt of the request.</p> <p>R2 Subject to the ISO receiving data as requested in requirement R1 and to the ISO's agreement with the WECC to provide such data, the ISO must provide to the WECC the RAS data requested. The ISO must provide such data within the timeframe specified by the WECC, but will not be obligated to provide it sooner than forty-five (45) days.</p>	<p><input type="checkbox"/> New <input checked="" type="checkbox"/> Amended <input type="checkbox"/> Deleted</p> <p>Amended for clarity and consistency and to identify the responsible entities in Alberta.</p> <p>Alberta Variance: Split the requirement in two to separately identify market participant and ISO responsibilities.</p>	<p><input type="checkbox"/> Support <input checked="" type="checkbox"/> Support with language suggestions <input type="checkbox"/> Oppose</p> <p><i>AltaLink supports the standard assuming that:</i></p> <ul style="list-style-type: none"> - <i>There are no further changes in the list between now and when the Commission approves the standard.</i> - <i>There is sufficient time allowed for any new schemes that are added to the list.</i> - <i>Documents/Data will only be sent to the AESO upon a request to update RAS settings.</i> 	
<p>R2. The Transmission Owner, Generator Owner, and Distribution Provider that owns an SPS shall</p>	<p>R3. The ISO must review new or functionally modified RASs in accordance with the WECC</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</p>	

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NERC PRC-015-0	Alberta PRC-015-AB-0	AESO Reason for Difference	Stakeholder Comments	AESO Replies
<p>have evidence it reviewed new or functionally modified SPSs in accordance with the Regional Reliability Organization's procedures as defined in Reliability Standard PRC-012-0_R1 prior to being placed in service.</p>	<p>procedures developed to meet applicable requirements in NERC reliability standards.</p>	<p>Amended for clarity and consistency.</p> <p>The applicable NERC requirement is requirement R1 in PRC-012-0. This reference will be published on the AESO website.</p>	<p><input type="checkbox"/> Oppose</p> <p><i>Altalink has no comment on ISO requirements</i></p>	
<p>R3. The Transmission Owner, Generator Owner, and Distribution Provider that owns an SPS shall provide documentation of SPS data and the results of Studies that show compliance of new or functionally modified SPSs with NERC Reliability Standards and Regional Reliability Organization criteria to affected Regional Reliability Organizations and NERC on request (within 30 calendar days).</p>	<p>R4 The ISO must provide data for RAS and the results of studies that show compliance of new or functionally modified RASs with reliability standards to the WECC within thirty (30) days of WECC's request.</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>Same as in R.1</i></p>	
<p>M1. The Transmission Owner, Generator Owner, and Distribution Provider that owns an SPS shall have evidence it maintains a list of and provides data for existing and proposed SPSs as defined in Reliability Standard PRC-013-0_R1.</p>	<p>MR1 Confirmation that the data for RAS was provided to the ISO as specified in requirement R1.</p> <p>MR2 Confirmation the data for RAS was provided to the WECC specified in requirement R2.</p>	<p><input type="checkbox"/> New <input checked="" type="checkbox"/> Amended <input type="checkbox"/> Deleted</p> <p>Amended to align with requirement R1 and R2.</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>M2. The Transmission Owner, Generator Owner, and Distribution Provider that owns an SPS shall have evidence it reviewed new or</p>	<p>MR3 Documentation exists and shows that the ISO has reviewed new or functionally modified RASs as specified in requirement R3.</p>	<p><input type="checkbox"/> New <input checked="" type="checkbox"/> Amended <input type="checkbox"/> Deleted</p>	<p><input type="checkbox"/> Support <input checked="" type="checkbox"/> Support with language suggestions <input type="checkbox"/> Oppose</p>	

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functionally modified SPSs in accordance with the Regional Reliability Organization's procedures as defined in Reliability Standard PRC-012-0_R1 prior to being placed in service.		Amended to align with requirement R3.	<i>AltaLink is unclear on the process to obtain evidence that the ISO has reviewed this.</i>	
M3. The Transmission Owner, Generator Owner, and Distribution Provider that owns an SPS shall have evidence it provided documentation of SPS data and the results of studies that show compliance of new or functionally modified SPSs with NERC standards and Regional Reliability Organization criteria to affected Regional Reliability Organizations and NERC on request (within 30 calendar days).	MR4 Confirmation that documentation as specified in requirement R4 was provided within the timelines specified.	<input checked="" type="checkbox"/> New <input type="checkbox"/> Amended <input type="checkbox"/> Deleted Added to align with requirement R4.	<input type="checkbox"/> Support <input type="checkbox"/> Support with language suggestions <input checked="" type="checkbox"/> Oppose <i>Same as in R. 1</i>	
Compliance To view the compliance section D of the NERC reliability standard follow this link: http://www.nerc.com/files/PRC-015-0.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		