



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>Jerry Mossing</u>
Period of Consultation [yyyy/mm/dd]: <u>2010/07/22</u> through <u>2010/08/27</u>	Phone: <u>403-539-2496</u>
Comments From: <u>Capital Power Corporation</u>	E-mail: <u>ars_comments@ieso.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 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>	
Effective Date	Effective Date			

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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 type="checkbox"/> Oppose <i>Insert comments, reason for position, and alternate proposal (if any).</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>	<input type="checkbox"/> New <input checked="" type="checkbox"/> Amended <input type="checkbox"/> Deleted Amended for clarity and consistency and to identify the responsible entities in Alberta. Alberta Variance: Split the requirement in two to separately identify market participant and ISO responsibilities.	<input type="checkbox"/> Support <input type="checkbox"/> Support with language suggestions <input checked="" type="checkbox"/> Oppose Capital Power does not support this standard as written because it does not provide any details as to what data might be required for Remedial Action Schemes (RAS) and for what time period. Market participants need to know what data will be requested of them to ensure that accurate records of the necessary data are being recorded and stored in an accessible format. Capital Power recommends that the objectives of the AESO's Transition of Authoritative Document (TOAD) should be followed in this drafting. More specifically, the AESO's TOAD	

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			<p>project seeks to provide clear requirements and obligations of market participants. All reliability standards should be drafted to clearly set out the obligations of market participants, to do otherwise is not consistent with cultivating a culture of compliance in the industry.</p> <p>Capital Power notes that the AESO has not specified whether this standard applies to System or Customer RAS. Does the AESO intend to differentiate between the two for the purpose of this Alberta Reliability Standard?</p> <p>We feel that the RAS schemes included in reliability standards should be treated as system RAS. These RAS schemes provide a benefit to the system and the data being provided will result in an improvement in Reliability of the Alberta System. The costs associated with tracking and maintaining data for RAS should be treated as system costs just as system RAS costs are. For GFOs, the AESO has been clear that the costs associated with</p>	

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			system projects would not be considered a participant-related cost and would be recoverable under a tariff just as TFO's RAS costs would be. We ask the AESO to confirm that the cost to a GFO of complying with this standard would be considered a system-related cost and would also be recovered through the AESO tariff.	
<p>R2. The Transmission Owner, Generator Owner, and Distribution Provider that owns an SPS shall 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>R3. The ISO must review new or functionally modified RASs in accordance with the WECC procedures developed to meet applicable requirements in NERC reliability standards.</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 applicable NERC requirement is requirement R1 in PRC-012-0. This reference will be published on the AESO website.</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>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</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 type="checkbox"/> Oppose</p> <p><i>Insert comments, reason for position, and alternate proposal (if any).</i></p>	

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<p>Organization criteria to affected Regional Reliability Organizations and NERC on request (within 30 calendar days).</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 type="checkbox"/> Support <input type="checkbox"/> Support with language suggestions <input checked="" type="checkbox"/> Oppose </p> <p>Capital Power does not support MR1 as currently written.</p> <p>MR1 states that in order to demonstrate compliance with this standard, market participants must have “Confirmation that the data for RAS was provided to the ISO as specified in R1”. It is unreasonable and inappropriate to make market participants responsible for the actions of another party, in this case the AESO. It is not appropriate to place an obligation on a market participant that would put it at risk of being found non-compliant if the AESO does not provide a requested confirmation. Particularly where the standard does not explicitly require that the AESO provide the confirmation.</p>	

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			<p>The NERC version of the standard only requires the generator owner to provide evidence that the information was submitted. This is all that a market participant can reasonably be responsible for.</p> <p>We have provided similar comments on this issue in consultation on VAR-002-AB-1, MOD-010&012-AB-0, and PRC-018-AB-1.</p> <p>Furthermore, after review of the Alberta Reliability Standards Compliance Frequently Asked Questions pertaining to obtaining a Confirmation from the AESO, we are increasingly concerned. The answer to Question 6 states that:</p> <p><i>“A registered entity that is unsuccessful in obtaining a confirmation letter must provide a) written evidence (e.g. emails and replies) that they have made a reasonable request for a confirmation letter, b) written evidence that they have escalated the request at least once, and c) any correspondence from the request, and d) the contact</i></p>	

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			<p><i>information (e.g. name, email, organization, phone number) of the person/party that has not responded. The registered entity will not be out of compliance to the standard if reasonable actions have been made to get a confirmation letter."</i></p> <p>The FAQ significantly increases the obligation of market participants to maintain documentation as market participants must satisfy a, b, c <i>and</i> d to demonstrate reasonable actions to avoid non-compliance.</p> <p>Furthermore, the FAQ states that market participants don't necessarily need a confirmation, and instead just need to prove that they made a concerted effort to obtain one. Therefore, it appears that this process serves no purpose other than to increase the obligation and risk of non-compliance on market participants. We do not see the need for the confirmation at all.</p> <p>If a market participant can provide evidence that they have submitted</p>	

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			the information required, particularly when the data is requested by the ISO, then confirmation from the AESO that the information provided is sufficient is unnecessary. It is the AESO's responsibility to notify the market participant if the information provided is unsatisfactory.	
<p>M2. The Transmission Owner, Generator Owner, and Distribution Provider that owns an SPS shall 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>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>Amended to align with requirement R3.</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>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</p>	<p>MR4 Confirmation that documentation as specified in requirement R4 was provided within the timelines specified.</p>	<p><input checked="" type="checkbox"/> New <input type="checkbox"/> Amended <input type="checkbox"/> Deleted</p> <p>Added to align with requirement R4.</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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Reliability Organizations and NERC on request (within 30 calendar days).				
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		