

**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> Period of Consultation [yyyy/mm/dd]: <u>2010/07/22</u> through <u>2010/08/27</u> Comments From: <u>Suncor Energy</u> Date [yyyy/mm/dd]: <u>2010/08/27</u>	Contact: <u>Jerry Mossing</u> Phone: <u>403-539-2496</u> E-mail: <u><a href="mailto:ars_comments@aeso.ca">ars_comments@aeso.ca</a></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-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><b>Purpose</b> 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><b>Purpose</b> 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><i>As written, this purpose does not reflect what is stated in the requirements. The purpose section focuses on RASs are properly designed, meet performance requirements, are documented and coordinated with other protection systems. The requirements focus on data requests.</i></p>	
<p><b>Applicability</b> 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><b>Applicability</b> This reliability standard applies to:</p> <ul style="list-style-type: none"> <li>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</li> <li>the ISO</li> </ul>	<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 checked="" type="checkbox"/> Oppose</p> <p><i>Suncor recommends that the information published on the AESO website should be captured in the body of this binding Standard for clarity. We would like to see stakeholders being made aware of all changes to the RAS list in advance of any changes.</i></p> <p><i>Suncor would like to suggest as well that the ISO RAS database be versioned and dated, so as to indicate the last time it was modified. This will assist</i></p>	

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			<p><i>registered entities to find out if there were any changes made that could cause them to be non-compliant.</i></p>	
<p><b>Effective Date</b> April 1, 2005</p>	<p><b>Effective Date</b> Ninety (90) days after the date of approval by the Commission.</p>	<p>To allow a reasonable amount of time for Alberta entities to implement this Alberta Reliability Standard.</p>	<p> <input type="checkbox"/> Support  <input type="checkbox"/> Support with language suggestions  <input checked="" type="checkbox"/> Oppose         </p> <p><i>Though not currently applicable to Suncor based on our initial assessment, Suncor is concerned that any entities added to this list, in the near future will have difficulty meeting compliance targets. We recommend 2-3 years for this standard to be compliant if the ISO modifies the RAS list to include a market participant with no current RAS facilities. This standard makes affected entities to be compliant and auditable and as such may not have the data complete as required.</i></p>	
<p><b>R1.</b> 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</p>	<p><b>R1</b> 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</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 checked="" type="checkbox"/> Oppose         </p>	

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<p>specified in Reliability Standard PRC-013-0_R1.</p>	<p>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><b>R2</b> 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>Amended for clarity and consistency and to identify the responsible entities in Alberta.</p> <p><b>Alberta Variance:</b> Split the requirement in two to separately identify market participant and ISO responsibilities.</p>	<p><i>With the AESO rejecting PRC-013-AB-0 for Alberta, there is no authoritative document that specifies how all RASs are to be properly designed and meet performance requirements. Without this related document, PRC-015-AB-0 does nothing more than obligate the registered entity to provide data to the ISO. If the purpose is indeed to address design and performance criteria than this standard as proposed is deficient.</i></p> <p><i>R1 – This standard does not specifically state what data is required by the ISO. This must be stated in the standard so the registered entity can collect the necessary data to ensure compliance.</i></p> <p><i>R2 – For better clarity and consistency, Suncor recommends this requirement start off with the wording 'The ISO must provide to WECC the RAS data requested, subject to...'</i></p>	
<p><b>R2.</b> The Transmission Owner, Generator Owner, and Distribution Provider that owns an SPS shall</p>	<p><b>R3.</b> 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 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"/> <i>Oppose</i></p> <p><i>Insert comments, reason for position, and alternate proposal (if any).</i></p>	
<p><b>R3.</b> 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><b>R4</b> 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"/> <i>Support</i> <input type="checkbox"/> <i>Support with language suggestions</i> <input type="checkbox"/> <i>Oppose</i></p> <p><i>Insert comments, reason for position, and alternate proposal (if any).</i></p>	
<p><b>M1.</b> 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><b>MR1</b> Confirmation that the data for RAS was provided to the ISO as specified in requirement R1.</p> <p><b>MR2</b> 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"/> <i>Support</i> <input type="checkbox"/> <i>Support with language suggestions</i> <input type="checkbox"/> <i>Oppose</i></p> <p><i>Suncor supports the use of confirmation using a "mirror and curtain" principle of compliance in that;</i> <i>- it accurately reflects the data held by the AESO and submitted</i></p>	

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			<i>by the market participant - the AESO need not look past the letter to establish compliance.</i>	
<p><b>M2.</b> 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><b>MR3</b> 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><b>M3.</b> 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).</p>	<p><b>MR4</b> 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 checked="" type="checkbox"/> Support  <input type="checkbox"/> Support with language suggestions  <input type="checkbox"/> Oppose</p> <p><i>See MR1</i></p>	
<p><b>Compliance</b> To view the compliance section D of the NERC reliability standard follow this link: <a href="http://www.nerc.com/files/PRC-015-0.pdf">http://www.nerc.com/files/PRC-015-0.pdf</a></p>		<p>The Alberta reliability standards do not contain a compliance section. Compliance with all Alberta reliability standards is completed in accordance with the Alberta</p>		

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<b>NERC PRC-015-0</b>	<b>Alberta PRC-015-AB-0</b>	<b>AESO Reason for Difference</b>	<b>Stakeholder Comments</b>	<b>AESO Replies</b>
		Reliability Standards Compliance Monitoring Program, available on the AESO website at: <a href="http://www.aeso.ca/loadsettlement/17189.html">http://www.aeso.ca/loadsettlement/17189.html</a> .		
<b>Regional Differences</b> None identified.	None identified.	Not applicable in Alberta		

<b>Definitions</b>	<b>Comments</b>	<b>Rationale and/or Alternate Proposal</b>
<b>(a) New</b> NA		
<b>(b) Removals</b> N/A		
<b>(c) Amendments</b> N/A		

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