



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>TransAlta</u>	E-mail: <u>ars_comments@aesocanada.com</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>As written, this purpose does not reflect what is stated in the requirements. The purpose section states that the purpose is to ensure that RASs are properly designed, meet performance requirements, are documented and coordinated with other protection systems. The requirements, however, simply focus on data requests. We suspect that by removing the reference to PRC-013-0 R1 in R1, many of the additional elements such as design objectives were removed.</p> <p>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.</p>	



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<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> TransAlta recommends AESO define in this standard the exact location of the ISO RAS database for clarity.</p> <p>TransAlta is also concerned that the ISO RAS database located under PRC-001-AB-1 is not versioned and has no dates indicating the last time it was modified. When entities review this database, they won't know if there were any changes made and this could cause them to be non-compliant. TransAlta recommends the AESO add versioning and dates.</p>	
<p>Effective Date April 1, 2005</p>	<p>Effective Date 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>	

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			<p><i>Insert comments, reason for position, and alternate proposal (if any).</i></p> <p>This standard is not currently applicable to TransAlta, but we recommend a least 180 days for this standard to be compliant. This standard requires effected entities to be compliant on the effective date and time may be required in order to prepare the required data.</p>	
<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</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 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 – TransAlta recommends the wording ‘, but will be not obligated to provide it sooner than’ be deleted as it does not improve the clarity of the requirement. One of AESO goals were to simplify and be consistent on redrafting the NERC standards. This phrase has not be used in any other standards and the wording around</p>	

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	sooner than forty-five (45) days.		<p>due dates should be consistent in all ARS</p> <p>The standard does not specifically state what data is required by the ISO. The data required must be stated in the standard so the registered entity can ensure they have the necessary data to demonstrate compliance.</p> <p>R2 – From a clarity and consistency perspective TransAlta recommends this requirement start off with the wording ‘The ISO’.</p>	
<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</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</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 type="checkbox"/> Oppose</p>	

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<p>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>within thirty (30) days of WECC's request.</p>	<p>Amended for clarity and consistency.</p>	<p><i>Insert comments, reason for position, and alternate proposal (if any).</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 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>MR1 – As a general principle, TransAlta believes that a confirmation from the AESO should be an option available to the entity to assist them in demonstrating their own compliance; however a confirmation should not be a requirement if the entity has proper evidence, such as paper trails of submissions etc, to demonstrate compliance. Confirmation from the AESO provides no additional value.</p> <p>TransAlta recommends MR1 be</p>	

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			reworded to read: Evidence exists that TFOs, GFOs, and WOs provided requested RAS data to the ISO as specified in R1.	
<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 Reliability Organizations and NERC on request (within 30 calendar days).</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 checked="" type="checkbox"/> Support with language suggestions <input type="checkbox"/> Oppose</p> <p><i>Insert comments, reason for position, and alternate proposal (if any).</i> TransAlta suggests that for clarity the AESO may want to reword MR4 to show that it applies to the ISO.</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-015-0.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		

TransAlta general comments:

The text in the draft standard does not show defined terms in bold and this makes it somewhat difficult to fully interpret the intention of the AESO in using particular language.