



Stakeholder Comparison Comment Rationale Matrix

2010-07-22

AESO AUTHORITATIVE DOCUMENT PROCESS

Alberta Reliability Standard – PRC-017-AB-0 Remedial Action Scheme Maintenance and Testing

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@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-017-0 AND ALBERTA PRC-017-AB-0
REMEDIAL ACTION SCHEME MAINTENANCE AND TESTING**

NERC PRC-017-0	Alberta PRC-017-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 adequate maintenance and testing of RASs and equipment integral to RASs.</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 that own a RAS or equipment integral to a RAS that is listed as either an AB RAS or WECC 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. • GFOs that own a RAS or equipment integral to a RAS that is listed as either an AB RAS or WECC 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. • WOs that own a RAS or equipment integral to a RAS that 	<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>Identified the remedial action scheme classification that applies to this standard and referenced the ISO RAS database that identifies the classification of each remedial action scheme.</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,</p>	<p><input type="checkbox"/> Support <input type="checkbox"/> Support with language suggestions <input type="checkbox"/> Oppose</p>	

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	<p>is listed as either an AB RAS or WECC 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.</p> <ul style="list-style-type: none"> • the ISO 	<p>under current Alberta Reliability Standard PRC-001-AB-1 Protection System Coordination.</p>		
<p>Effective Date April 1, 2005</p>	<p>Effective Date One hundred and eighty (180) 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 type="checkbox"/> Oppose</p> <p><i>Insert comments, reason for position, and alternate proposal (if any).</i></p>	
<p>R1. The Transmission Owner, Generator Owner, and Distribution Provider that owns an SPS shall have a system maintenance and testing program(s) in place. The program(s) shall include:</p> <p>R1.1. SPS identification shall include but is not limited to: R1.1.1. Relays. R1.1.2. Instrument transformers. R1.1.3. Communications systems, where appropriate. R1.1.4. Batteries.</p>	<p>R1 Each TFO, GFO, and WO, or any combination thereof, that owns a RAS or equipment integral to a RAS must have RAS maintenance and testing program(s) in place. These programs must:</p> <p>R1.1 identify the equipment integral to each RAS including:</p> <ul style="list-style-type: none"> • relays; • instrument transformers; • communications systems, where appropriate; • batteries; and 	<p><input type="checkbox"/> New <input checked="" type="checkbox"/> Amended <input type="checkbox"/> Deleted</p> <p>Amended for clarity and consistency.</p> <p>Alberta Variance: In order to capture all components that make up a remedial action scheme, the identification of other equipment as required for the remedial action scheme to function was added to the list of items in requirement R1.1.</p>	<p><input type="checkbox"/> Support <input type="checkbox"/> Support with language suggestions <input checked="" type="checkbox"/> Oppose</p> <p>For the standard to be fair, the compliance obligation must be directed at the party who has the ability to control physical compliance. Therefore, the obligation for implementation of a maintenance and testing program should not be placed on a GFO. The operator of a generating unit</p>	

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<p>R1.2. Documentation of maintenance and testing intervals and their basis.</p> <p>R1.3. Summary of testing procedure.</p> <p>R1.4. Schedule for system testing.</p> <p>R1.5. Schedule for system maintenance.</p> <p>R1.6. Date last tested/maintained.</p>	<p>other equipment as required for the RAS to function.</p> <p>R1.2 have documentation of maintenance and testing intervals and the basis for setting these intervals</p> <p>R1.3 have a summary of testing procedures for each type of equipment identified in requirement R1.1</p> <p>R1.4 have a schedule for testing RAS and each type of equipment identified in requirement R1.1</p> <p>R1.5 have a schedule(s) for maintaining RAS and each type of equipment identified in requirement R1.1</p> <p>R1.6 identify the date the RAS and each type of equipment identified in requirement R1.1 was last tested and maintained</p>	<p><input type="checkbox"/> New</p> <p><input type="checkbox"/> Amended</p> <p><input type="checkbox"/> Deleted</p> <p>Added to for clarity that</p>	<p>is the only party that would be able to ensure that the generating unit is compliant with this requirement.</p> <p>At a minimum, the requirement should have embedded in it, a due diligence defense for the GFO similar to that in ISO Rule 6.6 Pool Participant Non Compliance with Energy Market Dispatches since the action or inaction is out of the control of the GFO.</p> <p>For joint ownership situations, stating that the operator of a generating unit is responsible for compliance with this standard will resolve any complications that may arise.</p>	
	<p>R2 Each TFO, GFO, and WO that owns a RAS or equipment integral to a RAS must, as of the effective date of this reliability standard, maintain and test each RAS or components of</p>	<p><input checked="" type="checkbox"/> New</p> <p><input type="checkbox"/> Amended</p> <p><input type="checkbox"/> Deleted</p>	<p><input type="checkbox"/> Support</p> <p><input type="checkbox"/> Support with language suggestions</p> <p><input checked="" type="checkbox"/> Oppose</p>	

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	<p>a RAS in accordance with its maintenance and testing program(s) as required by requirement R1.</p>	<p>implementation of maintenance and testing programs for RAS is to occur on a go forward basis from the effective date of this reliability standard.</p>	<p>Capital Power does not support the AESO's decision to add Requirement 2 to the NERC version of this Reliability Standard for application in Alberta.</p> <p>R2 simply states that market participants will be required to implement the program described in R1 and maintain the evidence for R1 as of the effective date of the standard. This is duplicative of both R1 and the effective date section. R1 states that the responsible entity "must have RAS maintenance and testing programs in place." The term "in place" already implies that the program must also be implemented so it does not need to be repeated in R2. The evidence required for R1.6 is documentation of the tests and maintenance performed on each type of equipment. This evidence would be the same for R2 which provides further evidence of an overlap.</p> <p>The only additional information provided in R2 is that testing and maintenance records only need to</p>	

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			<p>be stored as of the effective date of the standard. While Capital Power appreciates the additional clarity provided by this statement, this information should be included in the Effective Date section of the standard rather than creating an additional requirement and therefore an additional risk of non-compliance for Alberta market participants.</p> <p>The AESO has stated that, where possible, there should be symmetry between the NERC and Alberta versions of Reliability Standards. In keeping with this guidance, additional requirements such as this section should not be added unnecessarily.</p>	
<p>R2. The Transmission Owner, Generator Owner, and Distribution Provider that owns an SPS shall provide documentation of the program and its implementation to the appropriate Regional Reliability Organizations and NERC on request (within 30 calendar days).</p>	<p>R3 Each TFO, GFO, and WO that owns a RAS or equipment integral to a RAS must provide documentation of the existence and implementation of its RAS maintenance and testing program(s) as required in requirement R1 within twenty (20) 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>Alberta Variance: Sub-requirement R3 amended for Alberta participants to provide documentation to the ISO as the compliance monitor for TFOs, WOs and demand customers and upon receiving a written request from</p>	<p><input type="checkbox"/> Support <input type="checkbox"/> Support with language suggestions <input type="checkbox"/> Oppose</p> <p>Capital Power requests that the AESO explain why the number of days to respond to a written request from the ISO has been reduced from 30 days in the</p>	

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		the ISO.	<p>NERC version of the standard to 20 days in the Alberta version? The data requested for this requirement is similar to that which would be requested for an audit. NERC responsible entities are notified 60 days in advance of a scheduled audit in order to provide responsible entities with enough notice to compile all the necessary documentation to prove their compliance. NERC's 30 days response requirement is already aggressive compared to the notification standard; the AESO's 20 day requirement is even more aggressive and will be difficult to comply with. We ask the AESO to reconsider this response requirement.</p> <p>It is unclear what data is required for R3 that would not have already been completed for R1. To the extent the data is the same, could the ISO not obtain the necessary information as part of a spot audit at any time? In what instances would the ISO require information that could not be obtained by a spot audit?</p>	

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	<p>R4 The ISO must maintain and publish a list of all RASs to which this reliability standard applies.</p>	<p><input checked="" type="checkbox"/> New <input type="checkbox"/> Amended <input type="checkbox"/> Deleted</p> <p>Alberta Variance: Sub-requirement R4 added for the ISO to maintain and publish a list of relevant remedial action schemes so that the Alberta entities were notified of which requirements applied to which remedial action schemes.</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>M1. The Transmission Owner, Generator Owner, and Distribution Provider that owns an SPS shall have a system maintenance and testing program(s) in place that includes all items in Reliability Standard PRC-017-0_R1.</p>	<p>MR1 Written RAS maintenance and testing program(s) exists and includes all the elements as identified in sub-requirements of requirement R1.</p> <p>MR1.1 A written RAS maintenance and testing program exists that specifies all equipment as identified in requirement R1.1.</p> <p>MR1.2. A written RAS maintenance and testing program exists which specifies maintenance and testing intervals and the basis for setting those intervals.</p> <p>MR1.3 A summary of testing procedures exists in the written RAS maintenance and testing program</p>	<p><input type="checkbox"/> New <input checked="" type="checkbox"/> Amended <input type="checkbox"/> Deleted</p> <p>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>	

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	<p>that specifies the test procedures for each type of equipment identified in sub-requirement, R1.1.</p> <p>MR1.4 A written RAS maintenance and testing program includes testing schedules for each RAS and each type of equipment identified in requirement R1.1.</p> <p>MR1.5 A written RAS maintenance and testing program includes maintenance schedules for each RAS and each type of equipment identified in requirement R1.1.</p> <p>MR1.6 Evidence exists of the date the RAS and each type of equipment identified in requirement R1.1 was last tested and maintained.</p>			
	<p>MR2 All records of RAS testing and maintenance, created after the effective date of this reliability standard exist and are complete, accurate and consistent with the maintenance and testing program(s) as required in requirement R1.</p>	<p><input checked="" type="checkbox"/> New <input type="checkbox"/> Amended <input type="checkbox"/> Deleted</p> <p>Added to align with requirement R2.</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. The Transmission Owner, Generator Owner, and Distribution Provider that owns an SPS shall</p>	<p>MR3 Confirmation that documentation of the existence and implementation of the RAS</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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<p>have evidence it provided documentation of the program and its implementation to the appropriate Regional Reliability Organizations and NERC on request (within 30 calendar days).</p>	<p>maintenance and testing program(s) was provided within the timelines specified in requirement R3.</p>	<p>Amended to align with requirement R3.</p>	<p><input checked="" type="checkbox"/> Oppose</p> <p>Capital Power does not support MR3 as currently written.</p> <p>MR3 states that in order to demonstrate compliance the market participant must have a "Confirmation" that the testing and maintenance program was provided within the specified timelines. It is unreasonable and unfair to require market participants to be 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 the requested confirmation. Particularly where the standard does not explicitly require that the AESO provide the confirmation. 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>	

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			<p>Capital Power has voiced this and similar concerns with reliability standards being drafted in such a way that market participants become responsible for actions that are beyond their control. When this standard was discussed at the working group prior to public consultation, these issues were raised by Capital Power and other participants. We have also provided comments on this issue in consultation on VAR-002-AB-1, MOD-010&012-AB-1, and PRC-011-AB-0.</p> <p>Question 6 of the Alberta Reliability Standards Compliance Frequently Asked Questions provides some clarification about compliance obligations with respect to confirmations but it does not go far enough. The AESO's response states:</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</i></p>	

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			<p><i>evidence that they have escalated the request at least once, and c) any correspondence from the request, and d) the contact 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 standards should be drafted clearly and endeavor to align the compliance effort with the purpose of the standard. The Purpose section of this standard specifies that the intent is to ensure adequate maintenance and testing of RASs and equipment integral to RASs. The intent is not to initiate a potentially lengthy and administratively burdensome process of obtaining confirmations from the AESO. We are unclear if this confirmation is even required to fulfill the purpose of the standard. Market participants should be able to verify whether or not a data request was responded to within a specified timeframe</p>	

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			<p>without requiring confirmation from the ISO.</p> <p>The FAQ significantly increases the obligation of market participants to maintain documentation as market participants must satisfy a, b, c and d to demonstrate reasonable actions to avoid non-compliance.</p>	
	<p>MR4 A list exists and is published that identifies all RASs as required in requirement R4.</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>	
<p>Compliance To view the compliance section D of the NERC reliability standard follow this link: http://www.nerc.com/files/PRC-017-0.pdf</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 Reliability Standards Compliance Monitoring Program, available on the AESO website at: http://www.aeso.ca/loadsettlement/17189.html.</p>		



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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		