

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> 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>ars_comments@aeso.ca</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-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 checked="" type="checkbox"/> Support with language suggestions <input 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. AESO should manage the RAS list in such a way that the market participants directly affected are advised in a timely fashion so as to maintain compliance, including adequate lead time to implement required system changes.</i></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><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 registered entities to find out if there were any changes made that could cause them to be non-compliant.</i></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 checked="" type="checkbox"/> Support with language suggestions <input type="checkbox"/> Oppose</p> <p><i>Recommend 2-3 years for newly affected participants (re: capital upgrades). For current RAS owners, Suncor supports the 180 day effective date.</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.</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; 	<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</p>	<p><input type="checkbox"/> Support <input type="checkbox"/> Support with language suggestions <input checked="" type="checkbox"/> Oppose</p> <p>R1.1 - AESO added the bullet</p> <ul style="list-style-type: none"> <i>any other equipment as required for the RAS to function.</i> <p><i>This is not auditable and unclear</i></p>	

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<p>R1.1.3. Communications systems, where appropriate. R1.1.4. Batteries.</p> <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>	<ul style="list-style-type: none"> • communications systems, where appropriate; • batteries; and <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>scheme to function was added to the list of items in requirement R1.1.</p>	<p><i>for compliance and should be removed.</i></p> <p>R1.3 - Suncor is concerned that 'for each type of equipment identified in requirement R1.1' is effectively duplicating R1.1, creating a condition whereby a single infraction could result in multiple penalties.</p> <p>R1.4 – same comment as R1.3</p> <p>R1.4 - By using the words 'and each type of equipment, could imply that if I have three items of one type, that I only one have to test one? This wording used actually makes it harder to read and understand than the NERC version.</p> <p>R1.4 and R1.5. Suncor recommends adding the word 'system' after the acronym 'RAS', in each of these sub requirements for clarity. By have a schedule for testing and maintaining a 'RAS system' that includes all the entities directly involved could result in an increased reliability of the BES.</p>	

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			<p><i>R1.5 – same comment as R1.3</i></p> <p><i>R1.6 – same comment as R1.3</i></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 a RAS in accordance with its maintenance and testing program(s) as required by requirement R1.</p>	<p><input checked="" type="checkbox"/> New <input type="checkbox"/> Amended <input type="checkbox"/> Deleted</p> <p>Added to for clarity that 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><input type="checkbox"/> Support <input checked="" type="checkbox"/> Support with language suggestions <input type="checkbox"/> Oppose</p> <p>R2 - See Suncor's comment in R1 about "equipment integral to a RAS"</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 the ISO.</p>	<p><input type="checkbox"/> Support <input type="checkbox"/> Support with language suggestions <input checked="" type="checkbox"/> Oppose</p> <p><i>The AESO is making this requirement more stringent on effective entities and to better align with the NERC standard, Suncor suggests 30 calendar days. Most Alberta Reliability Standards employ 30 days as the average response time for written requests. What is the AESO's case for more stringent application? Suncor does not feel that there is a pressing and</i></p>	

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			<i>substantial objective which would necessitate a more stringent timeframe.</i>	
	<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 checked="" type="checkbox"/> Support with language suggestions <input type="checkbox"/> Oppose </p> <p><i>Suncor recommends that this requirement be rewritten to state: 'The ISO must maintain and publish the ISO RAS database and notify affected entities of any changes'. AESO needs to indicate that sufficient time be given to new affected entities in order to become compliant. Suncor supports this position and suggests that the sufficient time given to fully implement, construct and comply with requirements be 2-3 years, as stated in our comments on the effective date.</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</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 checked="" type="checkbox"/> Oppose </p> <p><i>Suncor is concerned that MR1.1 through MR1.6 could cause a situation where a single infraction</i></p>	

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	<p>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 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><i>would result in multiple penalties. We recommend using the NERC measure and amend the wording to include the affected entities and equipment.</i></p> <p><i>Suncor believes that a single, adequately worded measure which accurately captures the requirements of R1.1 through R1.6 is preferable to 6 measures.</i></p> <p><i>In the alternative, if the measures are to remain separate for each sub-requirement, Suncor requests that the wording be uniform throughout the sub-measures, such as, "A written RAS maintenance and testing program includes" Consistency in the wording allows market participants and the AESO to better understand and assess what constitutes compliance.</i></p>	

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	<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 checked="" type="checkbox"/> Support <input type="checkbox"/> Support with language suggestions <input type="checkbox"/> Oppose</p>	
<p>M2. The Transmission Owner, Generator Owner, and Distribution Provider that owns an SPS shall 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>MR3 Confirmation that documentation of the existence and implementation of the RAS maintenance and testing program(s) was provided within the timelines 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>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 checked="" type="checkbox"/> Support with language suggestions <input type="checkbox"/> Oppose</p> <p><i>Suncor recommends that this requirement be rewritten to state: 'The ISO must maintain and publish the ISO RAS database and notify effective entities of any changes'. AESO needs to indicate that sufficient time be given to new affected entities in order to become compliant. (See above comment on effective date.)</i></p>	

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Compliance To view the compliance section D of the NERC reliability standard follow this link: http://www.nerc.com/files/PRC-017-0.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		