

Stakeholder Comparison Comment Rationale Matrix

2011-09-27

AESO AUTHORITATIVE DOCUMENT PROCESS

Alberta Reliability Standard – Alberta PRC-018-AB-1 Draft 2.1 *Disturbance Monitoring Equipment Installation and Data Reporting*

<p>Date of Request for Comment [yyyy/mm/dd]: <u>2011-09-27</u></p> <p>Period of Consultation [yyyy/mm/dd]: <u>2011-09-27</u> through <u>2011-10-21</u></p> <p>Comments From: <u>TransAlta</u></p> <p>Date [yyyy/mm/dd]: <u>October 21, 2011</u></p>	<p>Contact: <u>Joanna Luong-Tran</u></p> <p>Phone: <u>403-267-7319</u></p> <p>E-mail: <u>Joanna_Luong-Tran@transalta.com</u></p>
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**COMPARISON BETWEEN NERC PRC-018-1 AND CURRENT ALBERTA PRC-018-AB-1
DISTURBANCE MONITORING EQUIPMENT INSTALLATION AND DATA REPORTING**

NERC PRC-018-1	Alberta PRC-018-AB-1 Draft 2 (From previous consultation) ¹	Alberta PRC-018-AB-1 Draft 2.1 (Revised version for re-consultation)	Differences between Alberta PRC-018-AB-1 Draft 2.1 and NERC PRC-018-1	New Stakeholder Comments (Insert comments here)	AESO Replies
<p>Purpose Ensure that Disturbance Monitoring Equipment (DME) is installed and that Disturbance data is reported in accordance with regional requirements to facilitate analyses of events</p>	<p>Purpose The purpose of this reliability standard is to ensure that disturbance monitoring equipment is installed and that disturbance data is reported in accordance with regional requirements to facilitate analyses of events</p>	<p>Purpose The purpose of this reliability standard is to ensure that disturbance monitoring equipment is installed and that disturbance data is reported in accordance with regional requirements to facilitate analyses of events.</p>			
<p>Applicability 4.1. Transmission Owner. 4.2. Generator Owner.</p>	<p>Applicability This reliability standard applies to:</p> <ul style="list-style-type: none"> • TFOs that own disturbance monitoring equipment as identified in the list as required in requirement R1, as published by the AESO on the AESO website, and as may be amended from time to time by the AESO on notice to market participants. • GFOs that own disturbance monitoring equipment as identified in the list as required in requirement R1, as published by the AESO 	<p>Applicability This reliability standard applies to:</p> <ul style="list-style-type: none"> • the legal owner of a transmission facility that owns disturbance monitoring equipment as identified in the list as required in requirement R1, as published by the ISO on the AESO website and as amended from time to time by the ISO on notice to market participants; • the legal owner of a generating unit that owns disturbance monitoring 	<p>The terms used to describe applicable entities in this reliability standard have been amended from the NERC version in order to correctly identify the applicable entities in Alberta and to align with terms included in the AESO <i>Consolidated Authoritative Documents Glossary</i>.</p>		

¹ This column is informational only.

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	<p>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"> • ISO 	<p>equipment as identified in the list as required in requirement R1, as published by the ISO on the AESO website and as amended from time to time by the ISO on notice to market participants;</p> <ul style="list-style-type: none"> • the legal owner of an aggregated generating facility that owns disturbance monitoring equipment as identified in the list as required in requirement R1, as published by the ISO on the AESO website and as amended from time to time by the ISO on notice to market participants; and • the ISO. 			
<p>Effective Date Phased in over four years after BOT adoption: Requirements 1 and 2:</p>	<p>Effective Date Ninety (90) days after the date of approval by the Commission.</p>	<p>Effective Date October 1, 2012</p>	<p>The proposed effective date has been amended to October 1, 2012, to allow a reasonable amount of time for Alberta entities to</p>	<p>We note that PRC-023-AB-1 R4 specifically provides for an implementation period upon addition of facilities to the list. We recommend</p>	

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<ul style="list-style-type: none"> - 50% compliant two years after initial issuance of regional requirements per RELIABILITY STANDARD PRC-002 Requirement 5. - 75% compliant three years after initial issuance of regional requirements per reliability standard PRC-002 R5. - 100% compliant four years after initial issuance of regional requirements per reliability standard PRC-002 R5. <p>Requirements 3 through 6:</p> <ul style="list-style-type: none"> - 100% compliant six months after BOT adoption for already installed DME. - 100% compliant six months after installation for DMEs installed to meet Regional Reliability Organization requirements per reliability standard PRC-002 Requirements 1, 2 and 3. 			implement proposed PRC-018-AB-1 Draft 2.1.	consistent treatment of any newly added disturbance monitoring equipment in the IESO list, the approach set out in PRC-023-AB-1 R4.	

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<p>R1 Each Transmission Owner and Generator Owner required to install DMEs by its Regional Reliability Organization (reliability standard PRC-002 Requirements 1-3) shall have DMEs installed that meet the following requirements:</p> <p>R1.1. Internal Clocks in DME devices shall be synchronized to within 2 milliseconds or less of Universal Coordinated Time scale (UTC)</p> <p>R1.2. Recorded data from each Disturbance shall be retrievable for ten calendar days.</p>	<p>R1 The ISO must maintain and publish a list of all disturbance monitoring equipment that this reliability standard applies to, which includes all disturbance monitoring equipment the WECC requires to be installed in Alberta.</p> <p>R2 Each TFO and GFO that is directed to install disturbance monitoring equipment by the ISO must install disturbance monitoring equipment that meet the following requirements:</p> <p>R2.1 Internal clocks in disturbance monitoring equipment devices must be synchronized to within two</p>	<p>R1 The ISO must maintain and publish a list of all disturbance monitoring equipment that this reliability standard applies to which includes all disturbance monitoring equipment the WECC requires to be installed in Alberta.</p> <p>R2 Each legal owner of a transmission facility, legal owner of a generating unit and legal owner of an aggregated generating facility that the ISO directs to install disturbance monitoring equipment must install such disturbance monitoring equipment that meets the following requirements:</p> <p>R2.1 internal clocks in disturbance monitoring equipment devices must be synchronized to within two (2)</p>	<p><input type="checkbox"/> New <input checked="" type="checkbox"/> Amended <input type="checkbox"/> Deleted</p> <p>NERC requirement R1 has been amended in proposed PRC-018-AB-1 Draft 2.1 to identify requirements of the responsible entities in Alberta and for clarity and consistency.</p> <p>As well, reference to PRC-002 in Alberta requirement R2, as included in the NERC requirement, has been removed as these requirements apply to the Western Electricity Coordinating Council (“WECC”). The AESO will review new requirements as they are developed by WECC and consult appropriately with market participants at that time.</p> <p>Alberta requirement R2 has</p>		

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	<p>milliseconds or less of the Coordinated Universal Time (UTC) scale.</p> <p>R2.2 Recorded disturbance data must be retrievable for at least ten (10) days.</p>	<p>milliseconds or less of the Universal Coordinated Time scale; and</p> <p>R2.2 recorded disturbance data must be retrievable for at least ten (10) days.</p>	<p>been added to proposed PRC-018-AB-1 Draft 2.1 to capture the Alberta requirements of a legal owner of a transmission facility.</p>		
<p>R2. The Transmission Owner and Generator Owner shall each install DMEs in accordance with its Regional Reliability Organization’s installation requirements (reliability standard PRC-002 Requirements 1 through 3).</p>	<p>R3 Each TFO and GFO must install disturbance monitoring equipment as directed by the ISO.</p>	<p>R3 Each legal owner of a transmission facility, legal owner of a generating unit and legal owner of an aggregated generating facility must install disturbance monitoring equipment as directed by the ISO.</p>	<p><input type="checkbox"/> New <input checked="" type="checkbox"/> Amended <input type="checkbox"/> Deleted</p> <p>NERC requirement R2 has been amended in proposed PRC-018-AB-1 Draft 2.1 to identify the responsible entities in Alberta and for clarity and consistency.</p> <p>As well, the AESO will review and implement, as appropriate, relevant requirements and standards that are developed by the WECC.</p>		
<p>R3. The Transmission Owner and Generator Owner shall each maintain, and report to its Regional Reliability Organization on</p>	<p>R4 Each TFO and GFO must maintain and report, within 30 days of the ISO’s request, the following data on the disturbance monitoring</p>	<p>R4 Each legal owner of a transmission facility, legal owner of a generating unit and legal owner of an aggregated generating</p>	<p><input type="checkbox"/> New <input checked="" type="checkbox"/> Amended <input type="checkbox"/> Deleted</p>		

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<p>request, the following data on the DMEs installed to meet that region's installation requirements (reliability standard PRC-002 Requirements 1.1, 2.1 and 3.1):</p> <p>R3.1. Type of DME (sequence of event recorder, fault recorder, or dynamic disturbance recorder).</p> <p>R3.2. Make and model of equipment.</p> <p>R3.3. Installation location.</p> <p>R3.4. Operational status.</p> <p>R3.5. Date last tested.</p> <p>R3.6. Monitored elements, such as transmission circuit, bus section, etc.</p>	<p>equipment:</p> <p>R4.1 Type of disturbance monitoring equipment, sequence of event recorder, fault recorder or dynamic disturbance recorder.</p> <p>R4.2 Make and model of disturbance monitoring equipment.</p> <p>R4.3 Installation location.</p> <p>R4.4 Operational status.</p> <p>R4.5 Date last tested.</p> <p>R4.6 Monitored elements which may include, without limitation, transmission circuit and bus section.</p>	<p>facility must maintain and report, within thirty (30) days of the ISO's request, the following data on the disturbance monitoring equipment:</p> <p>R4.1 type of disturbance monitoring equipment;</p> <p>R4.2 make and model of disturbance monitoring equipment;</p> <p>R4.3 installation location;</p> <p>R4.4 operational status;</p> <p>R4.5 date last tested;</p> <p>R4.6 monitored elements which may include transmission circuit and bus section;</p>	<p>NERC requirement R3 has been amended in proposed PRC-018-AB-1 Draft 2.1 to identify the responsible entities in Alberta and for clarity and consistency.</p> <p>As well, NERC requirement R3 was divided into Alberta requirements R4 and R5 for legal owner of a transmission facility, legal owner of a generating unit and legal owner of an aggregated generating facility to report to the AESO and for the AESO to report to the WECC (please refer to R5 in the Alberta reliability standard below).</p> <p>²Alberta Variance: NERC requirement R3 has been amended in proposed PRC-018-AB-1 Draft 2.1 to add a time period by which data on disturbance monitoring equipment is to be submitted</p>		

² An Alberta variance is a change from the US Reliability Standard that the AESO has determined is material.

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<p>R3.7. Monitored devices, such as circuit breaker, disconnect status, alarms, etc.</p> <p>R3.8. Monitored electrical quantities, such as voltage, current, etc.</p>	<p>R4.7 Monitored devices which may include, without limitation, circuit breaker, disconnect status and alarms.</p> <p>R4.8 Monitored electrical quantities which may include, without limitation, voltage and current.</p>	<p>R4.7 monitored devices which may include circuit breaker, disconnect status and alarms; and</p> <p>R4.8 monitored electrical quantities which may include voltage and current.</p>	<p>to the AESO. This was included to add clarity and to make Alberta requirement R3 measurable.</p>		
<p>Refer to NERC requirement R3</p>	<p>R5 The ISO must provide the data received from the TFOs and GFOs in requirement R4 to the WECC within 45 days of the WECC's request.</p>	<p>R5 The ISO must provide the data received from the legal owner of a transmission facility, legal owner of a generating unit and legal owner of an aggregated generating facility in requirement R4 to the WECC within forty-five (45) days of the WECC's written request.</p>	<p><input checked="" type="checkbox"/> New <input type="checkbox"/> Amended <input type="checkbox"/> Deleted</p> <p>³Alberta Variance: New Alberta requirement R5 has been added in proposed PRC-018-AB-1 Draft 2.1 to include a time period by which data on disturbance monitoring equipment is to be submitted to the WECC. This was included to add clarity and to make Alberta requirement R5 measurable.</p>		

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<p>R4. The Transmission Owner and Generator Owner shall each provide Disturbance data (recorded by DMEs) in accordance with its Regional Reliability Organization’s requirements (reliability standard PRC-002 Requirement 4).</p>	<p>R6 Each TFO and GFO must provide all disturbance data recorded by disturbance monitoring equipment to the ISO within 30 days of a request.</p> <p>R7 The ISO must provide disturbance data recorded by a GFO’s or TFO’s disturbance monitoring equipment to the WECC within 60 days of WECC’s request.</p>	<p>R6 Each legal owner of a transmission facility, legal owner of a generating unit and legal owner of an aggregated generating facility must provide all disturbance data recorded by disturbance monitoring equipment to the ISO within thirty (30) days of the ISO’s written request.</p> <p>R7 The ISO must provide disturbance data recorded by the disturbance monitoring equipment of a legal owner of a transmission facility, legal owner of a generating unit and legal owner of an aggregated generating facility to the WECC within sixty (60) days of the WECC’s written request.</p>	<p><input type="checkbox"/> New <input checked="" type="checkbox"/> Amended <input type="checkbox"/> Deleted</p> <p>NERC requirement R4 has been divided into Alberta requirements R6 and R7 such that legal owner of a transmission facility, legal owner of a generating unit and legal owner of an aggregated generating facility provide disturbance data to the AESO and for the AESO to provide disturbance data to the WECC.</p> <p>⁴Alberta Variance: NERC requirement R4 has been amended in proposed PRC-018-AB-1 Draft 2.1 to add a time period by which disturbance data recorded by disturbance monitoring equipment is to be submitted</p>		

⁴ An Alberta variance is a change from the US Reliability Standard that the AESO has determined is material.

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			to the AESO and to the WECC. This was included to add clarity and to make Alberta requirement R4 measurable.		
<p>R5. The Transmission Owner and Generator Owner shall each archive all data recorded by DMEs for Regional Reliability Organization-identified events for at least three years.</p>	<p>R8 The ISO must archive all data recorded by disturbance monitoring equipment for all WECC or ISO identified events for at least three years.</p>	<p>R8 The ISO must archive all data recorded by disturbance monitoring equipment for all WECC or ISO identified events for at least three (3) years.</p>	<input type="checkbox"/> New <input checked="" type="checkbox"/> Amended <input type="checkbox"/> Deleted NERC requirement R8 amended in proposed PRC-018-AB-1 Draft 2.1 for clarity and consistency.		
<p>R6. Each Transmission Owner and Generator Owner that is required by its Regional Reliability Organization to have DMEs shall have a maintenance and testing program for those DMEs that includes:</p>	<p>R9 Each TFO and GFO that is directed by the ISO to have disturbance monitoring equipment must implement a maintenance and testing program for disturbance monitoring equipment that includes:</p>	<p>R9 Each legal owner of a transmission facility, legal owner of a generating unit and legal owner of an aggregated generating facility that the ISO directs to have disturbance monitoring equipment must develop, implement and maintain a maintenance and testing program for disturbance monitoring equipment that includes:</p>	<input type="checkbox"/> New <input checked="" type="checkbox"/> Amended <input type="checkbox"/> Deleted NERC requirement R9 amended in proposed PRC-018-AB-1 Draft 2.1 for clarity and consistency. ⁵ Alberta Variance: NERC requirement R6 states that entities must “have” a		

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<p>R6.1. Maintenance and testing intervals and their basis.</p> <p>R6.2. Summary of maintenance and testing procedures.</p>	<p>R9.1 Maintenance and testing intervals and their basis.</p> <p>R9.2 Summary of maintenance and testing procedures</p>	<p>R9.1 maintenance and testing intervals and their basis; and</p> <p>R9.2 a summary of maintenance and testing procedures.</p>	<p>maintenance and testing program for disturbance monitoring equipment. For clarity, “develop, maintain and implement” has been added to Alberta requirement R9 in proposed PRC-018-AB-1 Draft 2.1.</p>		
<p>M1. The Transmission Owner and Generator Owner shall each have evidence that DMEs it is required to have meet the functional requirements specified in Requirement 1 and are installed in accordance with its associated Regional Reliability Organization’s requirements (R2).</p>	<p>MR1 A list exists that identifies all disturbance monitoring equipment according to requirement R1.</p> <p>MR2 Measures for this requirement are identified in the sub-measures below:</p> <p>MR2.1 Confirmation exists that the disturbance monitoring equipment is synchronized as specified in requirement R2.1.</p>	<p>MR1 Evidence of maintaining and publishing a list as required in requirement R1. Evidence may include a list published on the AESO’s website that identifies the issue date, version, and revision history.</p> <p>MR2 The measures for requirement R2 are identified in the sub-measures below.</p> <p>MR2.1 Evidence of installing disturbance monitoring equipment as required in requirement R2.1 exists. Evidence may include for</p>		<p>We do not understand what is intended by “evidence of installing disturbance monitoring equipment as required in requirement R2.1 exists”. It appears to be asking for the evidence of installing equipment. Yet R2.1 is specific to the synchronization. Question – Is the measure asking for evidence of installation, in such case, what evidence would look like; or the evidence of specification, which seems to be explained in the second sentence MR2.1</p> <p>We have same question for</p>	

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	<p>MR2.2 Confirmation exists that the disturbance monitoring equipment stores disturbance data as specified in requirement R2.2.</p>	<p>each installed disturbance monitoring equipment a manufacturer's equipment specification identifying that the disturbance monitoring equipment's internal clock is synchronized in accordance with R2.1.</p> <p>MR2.2 Evidence of installing disturbance monitoring equipment as required in requirement R2.2 exists. Evidence may include for each installed disturbance monitoring equipment a manufacturer's equipment specification identifying that recorded data from each disturbance is retrievable from the disturbance monitoring equipment in accordance with R2.2.</p>		MR2.2	
<p>M2. The Transmission Owner and Generator Owner shall each maintain the data listed in Requirements 3.1 through 3.8 for the DMEs installed to meet its Regional Reliability Organization's</p>	<p>MR3 Confirmation exists that disturbance monitoring equipment has been installed as specified in requirement R3</p>	<p>MR3 Evidence of installing disturbance monitoring equipment as required in requirement R3 exists. Evidence may include documentation of the installation of the disturbance</p>			

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<p>DME installation requirements.</p> <p>M2.1 The Transmission Owner and Generator Owner shall each have evidence it provided this DME data to its Regional Reliability Organization within 30 calendar days of a request</p>		<p>monitoring equipment.</p>			
<p>M3. The Transmission Owner and Generator Owner shall each have evidence it retained and provided recorded Disturbance data to entities in accordance with its associated Regional Reliability Organization’s Disturbance data reporting requirements. (R4 R5)</p>	<p>MR4 Confirmation exists that data is maintained and is provided as specified in requirement R4.</p> <p>MR4.1 Data is complete and accurate for each disturbance monitoring equipment device as specified in requirement R4.1</p> <p>MR4.2 Data is complete and accurate for each disturbance monitoring equipment device as specified in requirement R4.2</p> <p>MR4.3 Data is complete and</p>	<p>MR4 Evidence of maintaining and reporting data as required in requirement R4 exists. Evidence may include email or mail to the appropriate ISO recipient that identifies data submitted.</p>		<p>Question: what would evidence of “maintaining” look like? The second sentence only talks about the evidence of reporting.</p>	

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	<p>accurate for each disturbance monitoring equipment device as specified in requirement R4.3</p> <p>MR4.4 Data is complete and accurate for each disturbance monitoring equipment device as specified in requirement R4.4.</p> <p>MR4.5 Data is complete and accurate for each disturbance monitoring equipment device as specified in requirement R4.5.</p> <p>MR4.6 Data is complete and accurate for each disturbance monitoring equipment device as specified in requirement R4.6</p> <p>MR4.7 Data is complete and accurate for each disturbance monitoring equipment device as specified in requirement R4.7.</p> <p>MR4.8 Data is complete and</p>				

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	accurate for each disturbance monitoring equipment device as specified in requirement R4.8.				
	MR5 Confirmation exists that data is provided as specified in requirement R5	MR5 Evidence of providing data as required in requirement R5 exists. Evidence may include email or mail to the appropriate WECC recipient that identifies data submitted.			
M4. Each Transmission Owner and Generator Owner that is required to install DMEs to meet its Regional Reliability Organization’s DME installation requirements, shall have an associated DME maintenance and testing program as defined in Requirement 6	MR6 Confirmation exists that disturbance data is provided as specified in requirement R6. MR7 Confirmation exists that data is provided as specified in requirement R7.	MR6 Evidence of providing data as required in requirement R5 exists. Evidence may include email or mail to the appropriate ISO recipient that identifies data submitted. MR7 Evidence of providing data as required in requirement R7 exists. Evidence may include email or mail to appropriate WECC recipient that identifies data		For MR6, “requirement R5” should be “requirement R6”	

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		submitted.			
	MR8 Confirmation exists that the ISO archived all data recorded by disturbance monitoring equipment for all WECC and ISO identified events as specified in requirement R8.	MR8 Evidence of archiving data as required in requirement R8 exists. Evidence may include dated archived data files.			
	<p>MR9 Confirmation exists that a written maintenance and testing program was implemented as specified in requirement R9.</p> <p>MR9.1 Interval information is included as specified in requirement R9.1.</p> <p>MR9.2 A summary as specified in requirement R9.2 exists and includes clear and detailed procedures.</p>	<p>MR9 The measures for requirement R9 are identified in the sub-measures below.</p> <p>MR9.1 Evidence of developing, implementing and maintaining a maintenance and testing program as required by requirement R9.1 exists. Evidence may include a documented maintenance and testing program that includes the provision as required in requirement R9.1.</p> <p>MR9.2 Evidence of developing, implementing and maintaining a maintenance and testing program as required by requirement R9.2</p>		<p>For MR9.1 Question: “evidence of developing, implementing and maintaining...” what would the evidence of “developing” look like? The second sentence only refers to the evidence of program documentation.</p> <p>R9.2 requires a summary of maintenance and testing procedures while MR9.2 is asking for the testing records, The maintenance and testing procedures are procedures per se, but the records show that the test was executed.</p>	

**COMPARISON BETWEEN NERC PRC-018-1 AND CURRENT ALBERTA PRC-018-AB-1
DISTURBANCE MONITORING EQUIPMENT INSTALLATION AND DATA REPORTING**

NERC PRC-018-1	Alberta PRC-018-AB-1 Draft 2 (From previous consultation) ¹	Alberta PRC-018-AB-1 Draft 2.1 (Revised version for re-consultation)	Differences between Alberta PRC-018-AB-1 Draft 2.1 and NERC PRC-018-1	New Stakeholder Comments (Insert comments here)	AESO Replies
		exists. Evidence may include maintenance and testing records showing the test date, type of test, what was tested and test results.			
Compliance To view the compliance section D of the NERC reliability standard follow this link: http://www.nerc.com/files/PRC-018-1.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.	Regional Differences None identified.	Regional Differences None identified.			

New Definitions	Stakeholder Comments (Insert comments here)	AESO Replies
The AESO is consulting separately on the following new Alberta Reliability Standard definition:		

New Definitions	Stakeholder Comments (Insert comments here)	AESO Replies
a) disturbance monitoring equipment. To view the consultation documents for the definition please visit the AESO website at www.aeso.ca and follow the path - Rules & Standards > Alberta Reliability Standards > Proposed Alberta Reliability Standards.		