



**Stakeholder Comparison Comment Rationale Matrix**

**2010-07-15**

**AESO AUTHORITATIVE DOCUMENT PROCESS**

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

*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>2010/07/15</u> Period of Consultation [yyyy/mm/dd]: <u>2010/07/15</u> through <u>2010/08/15</u> Comments From: <u>AltaLink Management Ltd.</u> Date [yyyy/mm/dd]: <u>2010/08/13</u>	Contact: <u>Karina Muniz</u> Phone: <u>403-267-5963</u> E-mail: <u>Karina.muniz@altalink.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-018-1 AND ALBERTA PRC-018-AB-1  
DISTURBANCE MONITORING EQUIPMENT INSTALLATION AND DATA REPORTING**

NERC PRC-018-1	Alberta PRC-018-AB-1	AESO Reason for Difference	Stakeholder Comments	AESO Replies
<p><b>Purpose</b> 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><b>Purpose</b> 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>Clarified the purpose to align with the content of the reliability standard.</p>		
<p><b>Applicability</b> 4.1. Transmission Owner. 4.2. Generator Owner.</p>	<p><b>Applicability</b> This reliability standard applies to:</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• GFOs 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.</li> <li>• 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><input type="checkbox"/> Support <input checked="" type="checkbox"/> Support with language suggestions <input type="checkbox"/> Oppose</p> <p><i>AltaLink recommends that the wording be adjusted to outline a process for revising the list, as per R1, that includes a stakeholder consultation activity and adds an appropriate effective date to allow TFOs and GFOs enough time to adopt any changes in requirements or revisions to the referenced equipment list.</i></p> <p><i>Altalink would also request that the wording be changed</i></p>	

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			<i>to clarify and specify the reference to the 'list' or information document that defines the applicable disturbance monitoring equipment scope of R1.</i>	
<p><b>Effective Date</b> Phased in over four years after BOT adoption: Requirements 1 and 2:</p> <ul style="list-style-type: none"> <li>– 50% compliant two years after initial issuance of regional requirements per RELIABILITY STANDARD PRC-002 Requirement 5.</li> <li>– 75% compliant three years after initial issuance of regional requirements per reliability standard PRC-002 R5.</li> <li>– 100% compliant four years after initial issuance of regional requirements per reliability standard PRC-002 R5.</li> </ul> <p>Requirements 3 through 6:</p> <ul style="list-style-type: none"> <li>– 100% compliant six months after BOT adoption for already installed DME.</li> <li>– 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.</li> </ul>	<p><b>Effective Date</b> Ninety (90) days after the date of approval by the Commission.</p>	<p>A ninety day implementation timeline was selected as this reliability standard currently applies to installed disturbance monitoring equipment. Any new installations will be performed in accordance with direction provided by the ISO.</p>	<p><input checked="" type="checkbox"/> Support <input type="checkbox"/> Support with language suggestions <input type="checkbox"/> Oppose</p> <p><i>AltaLink supports this assuming that the list, as per R1, does not change between now and when the standard gets approved by the Alberta Utilities Commission.</i></p>	

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<p><b>R1.</b> 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><b>R1.1.</b> Internal Clocks in DME devices shall be synchronized to within 2 milliseconds or less of Universal Coordinated Time scale (UTC)</p> <p><b>R1.2.</b> Recorded data from each Disturbance shall be retrievable for ten calendar days.</p>	<p><b>R1</b> 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><b>R2</b> 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><b>R2.1</b> Internal clocks in disturbance monitoring equipment devices must be synchronized to within two milliseconds or less of the Coordinated Universal Time (UTC) scale.</p> <p><b>R2.2</b> Recorded disturbance data must be retrievable for at least ten (10) days.</p>	<p><input type="checkbox"/> New  <input checked="" type="checkbox"/> Amended  <input type="checkbox"/> Deleted</p> <p>Amended to identify requirements of the responsible entities in Alberta and for clarity and consistency.</p> <p>Removed reference to PRC-002 as included in the NERC requirement as these requirements apply to the WECC. The ISO will review new requirements as they are developed by WECC.</p>	<p><input type="checkbox"/> Support  <input type="checkbox"/> Support with language suggestions  <input checked="" type="checkbox"/> Oppose</p> <p><i>Regarding R1  AltaLink would request that the wording be changed to clarify and specify the reference to the 'list' or information document that defines the applicable disturbance monitoring equipment scope of R1. I.e. direct reference to 2010-003RS.</i></p> <p><i>Regarding R2  The ISO is specifying the equipment to install. The ISO is obtaining the data directly with no intervention or visibility to the TFOs. AltaLink requests R2 be modified to reflect.</i></p> <p><i>For example, AltaLink believes it is possible to meet requirement R2.1 based on the specification of</i></p>	

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			<p><i>the PMUs, at the sited indentified in 2010-003RS, however the AESO would know the setting in the PMU since they are the ones to set it. The requirement should be adjusted to reflect the TFO has no accountability within R2.1.</i></p> <p><i>Altalink believes R2.2 is in conflict with other current AESO requirements and should be revised or removed. Is the intent of R2.2 that DME would store 10 days worth of data? This requirement is different from Section 2.2 of AESO PMU Requirements ver2.00. The 10 days requirement is also different from the 7 days as per the AESO Requirements.</i></p>	
<p><b>R2.</b> The Transmission Owner and Generator Owner shall each install DMEs in accordance with its Regional Reliability Organization's installation requirements (reliability standard PRC-</p>	<p><b>R3</b> Each TFO and GFO 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><input type="checkbox"/> Support  <input checked="" type="checkbox"/> Support with language suggestions  <input type="checkbox"/> Oppose</p>	

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NERC PRC-018-1	Alberta PRC-018-AB-1	AESO Reason for Difference	Stakeholder Comments	AESO Replies
002 Requirements 1 through 3).		<p>Amended to identify the responsible entities in Alberta and for clarity and consistency.</p> <p>The ISO will review and implement, as appropriate, relevant requirements and standards that are developed by the WECC.</p>	<p><i>AltaLink recommends the following language suggestions:</i></p> <p><i>“Each TFO and GFO must install disturbance monitoring equipment as directed <b>and specified</b> by the ISO.”</i></p> <p><i>AltaLink recommends that the wording be added to outline the process for revising the list, as per R1, that includes a stakeholder consultation activity and adds an appropriate effective date to allow TFOs and GFOs enough time to adopt any changes in requirements or revisions to the referenced equipment list.</i></p>	
<p><b>R3.</b> The Transmission Owner and Generator Owner shall each maintain, and report to its Regional Reliability Organization on request, the following data on the DMEs installed to meet that region’s installation requirements</p>	<p><b>R4</b> Each TFO and GFO must maintain and report, within 30 days of the ISO’s request, the following data on the disturbance monitoring equipment:</p>	<p><input type="checkbox"/> New  <input checked="" type="checkbox"/> Amended  <input type="checkbox"/> Deleted</p> <p>Amended to identify the responsible entities in Alberta and for clarity and consistency.</p>	<p><input type="checkbox"/> Support  <input type="checkbox"/> Support with language suggestions  <input checked="" type="checkbox"/> Oppose</p> <p><i>AltaLink recommends that</i></p>	

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<p>(reliability standard PRC-002 Requirements 1.1, 2.1 and 3.1):</p> <p><b>R3.1.</b> Type of DME (sequence of event recorder, fault recorder, or dynamic disturbance recorder).</p> <p><b>R3.2.</b> Make and model of equipment.</p> <p><b>R3.3.</b> Installation location.</p> <p><b>R3.4.</b> Operational status.</p> <p><b>R3.5.</b> Date last tested.</p> <p><b>R3.6.</b> Monitored elements, such as transmission circuit, bus section, etc.</p> <p><b>R3.7.</b> Monitored devices, such as circuit breaker, disconnect status, alarms, etc.</p> <p><b>R3.8.</b> Monitored electrical quantities, such as voltage, current, etc.</p>	<p><b>R4.1</b> Type of disturbance monitoring equipment, sequence of event recorder, fault recorder or dynamic disturbance recorder.</p> <p><b>R4.2</b> Make and model of disturbance monitoring equipment.</p> <p><b>R4.3</b> Installation location.</p> <p><b>R4.4</b> Operational status.</p> <p><b>R4.5</b> Date last tested.</p> <p><b>R4.6</b> Monitored elements which may include, without limitation, transmission circuit and bus section.</p> <p><b>R4.7</b> Monitored devices which may include, without limitation, circuit breaker, disconnect status and alarms.</p> <p><b>R4.8</b> Monitored electrical quantities which may include, without limitation, voltage and current.</p>	<p>Split the requirement for TFOs and GFOs to report to the ISO and for the ISO to report to the WECC (refer to R5 in the Alberta reliability standard below).</p> <p><b>Alberta Variance:</b> Added a time period by which data on disturbance monitoring equipment is to be submitted to the ISO. This was included to add clarity and to make the requirement measurable.</p>	<p><i>this requirement include wording revisions similar to the Applicability Section pertaining to the list.</i></p> <p><i>Furthermore, as the DMEs are installed under direction from AESO (R3), which obtains directly the data mentioned in R4.3, 4.6, 4.7 and 4.8. Thus, TFOs and GFOs have little to do with this data other than ensuring the equipment is working. We suggest the removal of these 4 requirements mentioned above from this standard or the accountability for providing and reporting be changed to the ISO.</i></p>	

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<p>Refer to NERC requirement R3.</p>	<p><b>R5</b> 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><input checked="" type="checkbox"/> New  <input type="checkbox"/> Amended  <input type="checkbox"/> Deleted</p> <p><b>Alberta Variance:</b> Added 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 the requirement measurable.</p>	<p><input type="checkbox"/> Support  <input type="checkbox"/> Support with language suggestions  <input checked="" type="checkbox"/> Oppose</p> <p><i>See comments under R4 above.</i></p>	
<p><b>R4.</b> 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><b>R6</b> 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><b>R7</b> 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><input type="checkbox"/> New  <input checked="" type="checkbox"/> Amended  <input type="checkbox"/> Deleted</p> <p>Split the requirement for TFO and GFO to provide disturbance data to the ISO and for the ISO to provide disturbance data to the WECC.</p> <p><b>Alberta Variance:</b> Added a time period by which disturbance data recorded by disturbance monitoring equipment is to be submitted to the ISO and to the WECC. This was included to add clarity and to make the requirement measurable.</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><i>Related to R6 - As the DMEs are installed under direction from AESO (R3), which obtains directly the data TFOs and GFOs have little to do with this data other than ensuring the equipment is working.  We suggest the accountability for providing and reporting be changed to</i></p>	

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			<i>the ISO.</i>	
<p><b>R5.</b> 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><b>R8</b> 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><input type="checkbox"/> New  <input checked="" type="checkbox"/> Amended  <input type="checkbox"/> Deleted</p> <p>Amended for clarity and consistency.</p>	<p><input checked="" 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><i>Altalink has no comment on ISO requirements.</i></p>	
<p><b>R6.</b> 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><b>R6.1.</b> Maintenance and testing intervals and their basis.</p> <p><b>R6.2.</b> Summary of maintenance and testing procedures.</p>	<p><b>R9</b> 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><b>R9.1</b> Maintenance and testing intervals and their basis.</p> <p><b>R9.2</b> Summary of maintenance and testing procedures.</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 checked="" 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>M1.</b> The Transmission Owner and Generator Owner shall each have evidence that DMEs it is required to have meet the functional requirements</p>	<p><b>MR1</b> A list exists that identifies all disturbance monitoring equipment according to requirement R1.</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 Requirement 1 and are installed in accordance with its associated Regional Reliability Organization's requirements (R2).</p>	<p><b>MR2</b> Measures for this requirement are identified in the sub-measures below:</p> <p><b>MR2.1</b> Confirmation exists that the disturbance monitoring equipment is synchronized as specified in requirement R2.1.</p> <p><b>MR2.2</b> Confirmation exists that the disturbance monitoring equipment stores disturbance data as specified in requirement R2.2.</p>	<p>Amended to align with requirement R1 and R2.</p>	<p><i>Insert comments, reason for position, and alternate proposal (if any).</i></p> <p><i>See comments under R1.</i></p> <p><i>See comments under R2.</i></p> <p><i>Measures should be revised to align with requested requirement changes.</i></p>	
<p><b>M2.</b> 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 DME installation requirements.</p> <p><b>M2.1</b> 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><b>MR3</b> Confirmation exists that disturbance monitoring equipment has been installed 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 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></p> <p><i>See comments under R3.</i></p> <p><i>Measures should be revised to align with requested requirement changes.</i></p>	

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<b>NERC PRC-018-1</b>	<b>Alberta PRC-018-AB-1</b>	<b>AESO Reason for Difference</b>	<b>Stakeholder Comments</b>	<b>AESO Replies</b>
<p><b>M3.</b> 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><b>MR4</b> Confirmation exists that data is maintained and is provided as specified in requirement R4.</p> <p><b>MR4.1</b> Data is complete and accurate for each disturbance monitoring equipment device as specified in requirement R4.1</p> <p><b>MR4.2</b> Data is complete and accurate for each disturbance monitoring equipment device as specified in requirement R4.2</p> <p><b>MR4.3</b> Data is complete and accurate for each disturbance monitoring equipment device as specified in requirement R4.3</p> <p><b>MR4.4</b> Data is complete and accurate for each disturbance monitoring equipment device as specified in requirement R4.4.</p> <p><b>MR4.5</b> Data is complete and accurate for each disturbance monitoring equipment device as specified in requirement R4.5.</p> <p><b>MR4.6</b> Data is complete and accurate for each disturbance</p>	<p><input type="checkbox"/> New  <input checked="" type="checkbox"/> Amended  <input type="checkbox"/> Deleted</p> <p>Amended to align with requirement R4.</p>	<p><input type="checkbox"/> Support  <input type="checkbox"/> Support with language suggestions  <input checked="" type="checkbox"/> Oppose</p> <p><i>See comments under R4 above.</i></p> <p><i>Measures should be revised to align with requested requirement changes as needed.</i></p>	

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	<p>monitoring equipment device as specified in requirement R4.6</p> <p><b>MR4.7</b> Data is complete and accurate for each disturbance monitoring equipment device as specified in requirement R4.7.</p> <p><b>MR4.8</b> Data is complete and accurate for each disturbance monitoring equipment device as specified in requirement R4.8.</p>			
	<p><b>MR5</b> Confirmation exists that data is provided as specified in requirement R5.</p>	<p><input checked="" type="checkbox"/> New  <input type="checkbox"/> Amended  <input type="checkbox"/> Deleted</p> <p>Added to align with requirement R5.</p>	<p><input type="checkbox"/> Support  <input type="checkbox"/> Support with language suggestions  <input checked="" type="checkbox"/> Oppose</p> <p><i>See comments under R4 and R5 above.</i></p> <p><i>Measures should be revised to align with requested requirement changes as needed.</i></p>	
<p><b>M4.</b> 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</p>	<p><b>MR6</b> Confirmation exists that disturbance data is provided as specified in requirement R6.</p> <p><b>MR7</b> Confirmation exists that data is provided as specified in</p>	<p><input type="checkbox"/> New  <input checked="" type="checkbox"/> Amended  <input type="checkbox"/> Deleted</p> <p>Amended to align with requirement R6 and</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</i></p>	

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<b>NERC PRC-018-1</b>	<b>Alberta PRC-018-AB-1</b>	<b>AESO Reason for Difference</b>	<b>Stakeholder Comments</b>	<b>AESO Replies</b>
testing program as defined in Requirement 6.	requirement R7.	R7.	<p><i>position, and alternate proposal (if any).</i></p> <p><i>See comments under R6 and R7 above.</i></p> <p><i>Measures should be revised to align with requested requirement changes as needed.</i></p>	
	<b>MR8</b> 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.	<input checked="" type="checkbox"/> New <input type="checkbox"/> Amended <input type="checkbox"/> Deleted  Added to align with requirement R8.	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Support with language suggestions <input type="checkbox"/> Oppose  <i>Insert comments, reason for position, and alternate proposal (if any).</i>  <i>Altalink has no comment on ISO requirements.</i>	
	<b>MR9</b> Confirmation exists that a written maintenance and testing program was implemented as specified in requirement R9.  <b>MR9.1</b> Interval information is included as specified in	<input checked="" type="checkbox"/> New <input type="checkbox"/> Amended <input type="checkbox"/> Deleted  Added to align with requirement R9.	<input type="checkbox"/> Support <input checked="" type="checkbox"/> Support with language suggestions <input type="checkbox"/> Oppose  <i>Insert comments, reason for position, and alternate proposal</i>	

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	<p>requirement R9.1.</p> <p><b>MR9.2</b> A summary as specified in requirement R9.2 exists and includes clear and detailed procedures.</p>		<p><i>(if any).</i></p> <p><i>MR9.2 should be changed to "A summary as specified in requirement R9.2 exists".</i></p> <p><i>The reference to "clear and detailed" is vague and conflicts with the stated requirement to provide a summary.</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-018-1.pdf">http://www.nerc.com/files/PRC-018-1.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 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>.</p>		
<p><b>Regional Differences</b> None identified.</p>	<p>None identified.</p>	<p>Not applicable in Alberta</p>		

Definitions	Comments	Rationale and/or Alternate Proposal
<p><b>(a) New</b></p> <p>“<i>disturbance monitoring equipment</i>” means devices capable of monitoring and recording system data pertaining to a disturbance, including any or all of the following:</p> <ul style="list-style-type: none"> <li>(i) sequence of event recorders which record equipment response to the disturbance;</li> <li>(ii) fault recorders, which record actual waveform data replicating the system primary voltages and currents and which include protective relays that provide this functionality; and</li> <li>(iii) dynamic <i>disturbance</i> recorders which record incidents that portray system behaviour during disturbances, such as low-frequency (0.1 Hz - 3 Hz) oscillations, abnormal frequency or voltage excursions, and which include protective relays and phasor measurement units that provide this functionality.</li> </ul>	<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><i>This definition, while technically correct, is significantly larger and different than the 4 PMU units defined in ID 2010-003RS as applicable under this standard and could lead to confusion and potentially significant concerns for AltaLink if the applicable equipment for this standard were to change in the future to this much larger set of equipment.</i></p> <p><i>AltaLink recommends that the definition be modified or removed/replaced by that contained in the ID document applicable to this standard.</i></p> <p><i>Furthermore, as described above, AltaLink requests changes be to the requirements to outline the</i></p>	

Definitions	Comments	Rationale and/or Alternate Proposal
	<p><i>process for revising the applicable equipment list, that includes a stakeholder consultation activity and adds an appropriate effective dates to allow TFOs and GFOs enough time to adopt any potential changes in requirements or revisions to the referenced equipment list.</i></p>	
<p><b>(b) Removals</b> N/A</p>		
<p><b>(c) Amendments</b> N/A</p>		