

Stakeholder Comment Form

Alberta Reliability Standards Process – October 2009

Proposed New Alberta Reliability Standards

Date of Request for Comment: August 13, 2009
Period of Consultation: August 13 through September 14, 2009

Comments From: TransAlta
Date: September 14, 2009
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Reliability Standard Number	Description	Stakeholder Comments
IRO-006-WECC-AB-1	Qualified Transfer Path Unscheduled Flow Relief	
PRC-001-AB-1	Protection System Coordination	The standard shows Applicability to both GFOs and GOPs. The NERC version of the standard shows applicability to just Generator Operators. TransAlta requests clarification from the AESO as to how they are assigning responsibility to this standard, as well as many others. TransAlta's recent understanding is that the GFO standards will, from this point forward, cover the Generator Owner requirements only and that the Generator Operator requirements would be solely assigned to the GOP classification. We believe this provides more clarity in the case where the owner and the operator of a generating plant are different. If this change is not made, and the GFO includes both the Generator Owner and Generator Operator standards, and a standard is assigned to both a GFO and a GOP then the division of requirements between the owner and the operator of the asset will be difficult to determine. For this reason we would recommend that this standard be applicable to just Generator Operators, and not GFO's. Additionally, we would recommend that all GFO standards be changed to include just the Generator Owner standards which may mean making any associated changes that may result if some of the applicability needs to be assigned to the GOP. This comment will follow through to a number of

		<p>the requirements in the standard as well where either GFO or GOP is mentioned in the requirement itself.</p> <p>R8 states “Each GOP must provide reasonable prior notice to the TFO . . .”. We would propose striking the word reasonable as it is subjective term.</p>
PRC-004-AB-1	Analysis and Mitigation of Transmission and Generation Protection System Misoperation	<p>The standard shows Applicability to the GFOs. The NERC version of the standard shows applicability to just Generator Owners. TransAlta requests clarification from the AESO as to how they are assigning responsibility to this standard, as well as many others. TransAlta’s recent understanding is that the GFO standards will, from this point forward, cover the Generator Owner requirements only and that the Generator Operator requirements would be solely assigned to the GOP classification. We believe this provides more clarity in the case where the owner and the operator of a generating plant are different.</p> <p>R1 It would be useful to reference the Alberta documents that will be used to manage analysis of protection system misoperations. The Reasons for Difference state that Alberta will use existing OPPs and PRC-004-WECC-1. It would be useful to include these references right in the requirement.</p> <p>R2 It would be useful to reference the Alberta documents that will be used to manage analysis of protection system misoperations. The Reasons for Difference state that Alberta will use existing OPPs and PRC-004-WECC-1. It would be useful to include these references right in the requirement.</p>
PRC-004-WECC-AB-1	Protection System and Remedial Action Scheme Misoperation	<p>The standard shows Applicability to both GFOs and GOPs. The NERC version of the standard shows applicability to just Generator Owners. TransAlta requests clarification from the AESO as to how they are assigning responsibility to this standard, as well as many others. TransAlta’s recent understanding is that the GFO standards will, from this point forward, cover the Generator Owner requirements only and that the Generator Operator requirements would be solely assigned to the GOP classification. We believe this provides more clarity in the case where the owner and the operator of a generating plant are different. If this change is not made, and the GFO includes both the Generator Owner and Generator Operator standards, and a standard is assigned to both a GFO and a GOP then the division of requirements between the owner and the operator of the asset will be difficult to determine. We would recommend that this standard just be applicable to the GFOs</p>

		<p>as Generator Owners. If the Applicability is with the GFO only but there is another party operating their particular RAS, the GFO (owner) will be responsible to put in place the necessary agreements between themselves and the operator of that facility.</p> <p>R2.3.2.1, R2.3.2.2 both state “If the responsible entity is. . .” It is not clear what the statement “If the responsible entity is” means. How would one determine this?</p>
PRC-005-AB-1	Transmission and Generation Protection System Maintenance and Testing	<p>The standard shows Applicability to the GFOs. The NERC version of the standard shows applicability to just Generator Owners. TransAlta requests clarification from the AESO as to how they are assigning responsibility to this standard, as well as many others. TransAlta’s recent understanding is that the GFO standards will, from this point forward, cover the Generator Owner requirements only and that the Generator Operator requirements would be solely assigned to the GOP classification. We believe this provides more clarity in the case where the owner and the operator of a generating plant are different.</p> <p>Effective Date: TransAlta would prefer to see a staged implementation plan as follows:</p> <ul style="list-style-type: none"> R1, R1.1, R1.2: one year after approval by the Commission R2, R3: three years after approval by the Commission <p>We have assessed the implementation of this standard to be a very large effort based on TransAlta’s experience with this standard plus the size of our hydro, thermal and gas fleet. We are requesting the longer time period given that the approval date is not known. Additionally the enforcement regime for the reliability standards still has not been defined, including the use of Self Reports and Mitigation Plans. Finally, we would like to coordinate any required testing with our planned outage schedules.</p> <p>R1.2 “Documented (suggest to add “summary of”) maintenance and testing procedures . . .”.</p>
PRC-016-AB-0	Remedial Action Scheme Misoperations	<p>‘The standard shows Applicability to the GFOs. The NERC version of the standard shows applicability to just Generator Owners. TransAlta requests clarification from the AESO as to how they are assigning responsibility to this standard, as well as many others. TransAlta’s recent understanding is that the GFO standards will, from this point forward, cover the Generator Owner requirements only and that the</p>

		<p>Generator Operator requirements would be solely assigned to the GOP classification. We believe this provides more clarity in the case where the owner and the operator of a generating plant are different.</p> <p>Applicability states “TFOs GFOs and WOs who are designated by the ISO as an owner of components of a RAS”. The standard should indicate how the ISO will notify the various entities to whom this will apply. When will they be notified by? How will the ISO notify entities if there are changes to the applicability? We would suggest a Requirement be added for the ISO regarding notification to participants.</p>
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Please return this form with your comments by September 14, 2009, to:

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