

November 9, 2021

To: The Market Surveillance Administrator, market participants and other interested parties
("Stakeholders")

Re: **Letter of Notice of Draft Proposed Amendment to Section 502.9 of the ISO Rules,
Synchrophasor Measurement Unit Technical Requirements ("Section 502.9")**

Pursuant to Alberta Utilities Commission Rule 017: *Procedures and Process for Development of ISO Rules and Filing of ISO Rules with the Alberta Utilities Commission* ("Rule 017"), the Alberta Electric System Operator ("AESO") is providing notice and seeking feedback from Stakeholders on the draft proposed amended Section 502.9.

Issue and Objectives

Section 502.9 contains requirements for the legal owner of a generating unit, legal owner of an aggregated generating facility, and legal owner of a transmission facility implementing a synchrophasor measurement unit to meet the requirements set out in guidance provided by the Institute of Electrical and Electronics Engineers ("IEEE"). While 502.9 contains a reference to *IEEE Standard C37.118 - 2005 Synchrophasors for Power Systems* ("IEEE Standard 2005") published in 2005, more recent industry guidelines are based on technical requirements in the *IEEE Standard C37-118.1.2-2011 – Synchrophasors Data Transfer for Power Systems* ("IEEE Standard 2011), published in 2011 and its amendment, *IEEE Standard C37.118.1a-2014 – Synchrophasors measurements for Power Systems* ("IEEE Standard 2014) published in 2014.

The proposed amendments to Section 502.9 are intended to ensure that the legal owners of generating units, legal owners of aggregated generating facilities, and legal owners of transmission facilities implementing synchrophasor measurement units in Alberta are aligned with the technical requirements in IEEE Standard 2011 and IEEE Standard 2014.

In its letter of notice posted July 13, 2020, the AESO proposed to revise the language in Section 502.9 to refer to the current version of IEEE Standard C37-118 in effect, in order to reduce the regulatory burden of updating the ISO rule each time IEEE Standard C37-118 is updated.

The AESO received written comments from Stakeholders in response to the Letter of Notice, where Stakeholders highlighted concerns regarding updating the ISO rule provisions to automatically incorporate the latest version of IEEE Standard C37-118. After further internal AESO review, the AESO has decided to refer to a specific version of IEEE Standard C37-118, as opposed to broadly referring to the version currently in effect. Therefore, the AESO is proposing to update the outdated reference to the IEEE Standard 2005 and, instead, make specific reference to IEEE Standard 2011 and IEEE Standard 2014.

Furthermore, the AESO considered whether to allow for legacy treatment for existing installations which are compliant with IEEE Standard 2005. The AESO has included a provision that would allow for legacy treatment for existing facilities. However, the AESO may use its discretion on a case-by-case basis to require compliance with any or all requirements in Section 502.9 based on the AESO's determination of safety or reliability needs.

Stakeholder Comments and AESO Responses

Stakeholders may submit written comments to the AESO using the *Stakeholder Comment Matrix – Draft Proposed ISO Rule*. The AESO will only consider written comments in finalizing the draft proposed amended Section 502.9. Stakeholders should ensure that comments provided represent all interests within their organization. The scope of comments is limited to the draft proposed amended Section 502.9. The AESO will not consider any comments that are outside of this scope.

The deadline for Stakeholders to provide comments is **November 30, 2021**, to rules_comments@aeso.ca. Adherence to deadlines is essential to the timely and effective completion of the ISO rule development process, and as such, the AESO may choose not to consider any Stakeholder comments received after the deadline.

The AESO will publish all Stakeholder comments, received by the deadline, and the AESO's responses on the AESO website. If the AESO does not receive any comments regarding the draft proposed amended Section 502.9, the AESO will proceed to apply to the Commission for approval of Section 502.9 pursuant to AUC Rule 017.

Related Materials

The following documents can be accessed on the Stakeholder Engagement page on the AESO website:

1. *Stakeholder Comment Matrix – Draft Proposed ISO Rule* for the draft proposed amended Section 502.9; and
2. Blackline and clean copies of the draft proposed amended Section 502.9.

If you have any questions, please submit them to rules_comments@aeso.ca.

Sincerely,

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