

December 3, 2021

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

Re: **Stakeholder Comments on Letter of Notice – 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*, written comments received from the Stakeholders in response to the Alberta Electric System Operator's ("AESO") November 9, 2021 Letter of Notice regarding the proposed amendment to Section 502.9 have been posted on the AESO website.

Comments were received from the following Stakeholder:

1. AltaLink Management Ltd.

The written Stakeholder comments can be found on the Stakeholder engagement page on the AESO website at [www.aeso.ca](http://www.aeso.ca). Follow the path Stakeholder Engagement > Rules, standards and tariff consultations > Section 502.9.

Thank you to all Stakeholders who participated in this ISO rules comment process. All written comments received will be considered in the AESO's finalization of the proposed amendment to Section 502.9 and responses to those comments will be posted on the AESO website.

If you have any questions, please submit them to [rules\\_comments@aeso.ca](mailto:rules_comments@aeso.ca)

Sincerely,

*Jodi Marshall*

Legal Manager, ISO Rules and Alberta Reliability Standards  
Legal and Regulatory Affairs  
[rules\\_comments@aeso.ca](mailto:rules_comments@aeso.ca)

<p><b>Period of Comment:</b> November 9, 2021 through November 30, 2021</p> <p><b>Comments From:</b> AltaLink</p> <p><b>Date [yyyy/mm/dd]:</b> November 30, 2021</p>	<p><b>Contact:</b> Jenette Yearsley</p> <p><b>Phone:</b> 403-387-8275</p> <p><b>Email:</b> Jenette.Yearsley@AltaLink.caA</p>
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Instructions:

1. Please fill out the section above as indicated.
2. Please refer back to the “related material” on the Stakeholder Engagement page on the AESO website.
3. Please respond to the questions below and provide your specific comments, if any. Blank boxes will be interpreted as favourable comments.

**The AESO is seeking comments from Stakeholders on the proposed amendments to Section 502.9, with regard to the following matters:**

	<b>AESO Questions to Stakeholders</b>	<b>Stakeholder comments</b>
1	Do you understand and agree with the objective or purpose of the proposed amendments to Section 502.9 and whether, in your view, the proposed amendments to Section 502.9 meets the objective or purpose? If not, why.	AltaLink is pleased to see that the AESO has addressed the issue of automatic updates to industry standards. This will bring certainty to Market Participants.  AltaLink understands that the purpose is to ensure new PMU implementations are aligned with the more recent IEEE standards. However, AltaLink wishes to better understand why changing the reference to IEEE Standard C37.118-2005 is required. Is the AESO aware of a deficiency with the IEEE Standard C37.118-2005 standard? AltaLink has concern that updating the reference to the new standard simply due to there being new standards may result in costs to market participants and ratepayers that may not be warranted. .
2	Do you agree that the proposed amendments to Section 502.9 are not technically deficient? If not, why.	AltaLink does not think that the proposed amendments are technically deficient, however, AltaLink is not sure the amendments are technically required.
3	Do you agree with the proposed amendments to Section 502.9, taken together with all ISO rules, supports a fair, efficient and openly competitive market? If not, why?	AltaLink is concerned that the amendments may result in a material impact on costs which will be borne by market participants and ratepayers.
4	Do you agree that the proposed amendments to Section 502.9 supports the public interest? If not, why?	AltaLink appreciates the substantial value that PMUs provide system operators, however, it is not apparent to AltaLink of any value of these amendments beyond referencing a more recent standard. It would have been beneficial to stakeholders for the



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		AESO to provide the benefit of changing the referenced industry standards to market participants and ratepayers.
5	If approved, the AESO will propose an effective date of March 1, 2022. Do you agree? If not, why not?	AltaLink agrees.
6	Any additional comments regarding the proposed amendments to Section 502.9?	<p>AltaLink seeks clarification on ISO Rule 502.9 and its current draft. Information Document Disturbance Monitoring and Reporting Requirements ID #2018-022 states:</p> <p><b>3.1 Existing Streaming Synchrophasor Measurement Units</b>                      Requirement R8 in PRC-002-AB-2 creates an exemption for any legal owner responsible for dynamic disturbance recording data that is required to have continuous data recording and storage, provided they comply with subsection 7(1) of Section 502.9. If a legal owner complies with Section 502.9, the requirements in that ISO rule related to the subject matter apply. Because subsection 7(2) of Section 502.9 requires data streaming to the AESO, the AESO does not anticipate submitting a written request, pursuant to requirement R11 in PRC-002-AB-2 to a legal owner for the streamed dynamic disturbance recording data that the AESO already receives.</p> <p>AltaLink requires further clarification on ISO Rule 502.9. AltaLink provides the following comment and request for clarification regarding the “subject to” in 7(1) and 7(2):</p> <p>7(1) Subject to subsection 7(2), each of the legal owner of a generating unit, legal owner of an aggregated generating facility and legal owner of a transmission facility must collect and continuously store the synchrophasor measurement unit data for 1 year from the date the synchrophasor measurement unit data was collected.</p> <p>(2) A legal owner of a generating unit, legal owner of an aggregated generating facility or legal owner of a transmission facility, required to implement a synchrophasor measurement unit, as determined by the ISO, must stream the data to the ISO.</p> <p>Specifically, it is unclear what is meant by the “subject to” as it does not state what occurs</p>



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		if subsection 7(2) is applicable. AltaLink assumes that the “subject to” is intended to mean that if subsection 7(2) is applicable then AltaLink does not need to comply with subsection 7(1) but that is not clearly stated in subsection 7(1). AltaLink believes this interpretation is corrected based on the AESO replies to Stakeholder Comments: 2012-12-11. AltaLink wishes to confirm its interpretation is correct and to recommend that this is made clear in the final version of the section in order to provide clarity to market participants.
7	Please provide any comments or views on the need for the development of a related information document, including the type of content that should be included.	As there are no references to the IEEE standards in Information Document Synchronphasor Measurement Unit ID# 2012-028R, AltaLink does not see a need for an updated Information Document.