

December 7, 2020

To: Market Participants and Other Interested Parties

Re: **Consultation Letter – Proposed New Alberta Reliability Standard PER-006-AB-1, *Specific Training for Personnel***

Section 19 of the *Transmission Regulation* requires the Alberta Electric System Operator (“AESO”) to consult with market participants and other interested parties (“Stakeholders”) likely to be directly affected by the AESO’s adoption or making of reliability standards, and also requires the AESO to forward the proposed reliability standards to the Alberta Utilities Commission (“Commission”) for review along with the AESO’s recommendation that the Commission approve or reject them.

Accordingly, the AESO is providing notice and seeking comments from Stakeholders on the attached proposed new PER-006-AB-1, *Specific Training for Personnel* (“new PER-006-AB-1”).

Applicability

The proposed new PER-006-AB-1 is applicable to:

- (a) the operator of a generating unit that has a maximum authorized real power greater than or equal to 5 MW and where the generating unit is:
 - (i) connected to a switchyard at which system access service is provided to:
 - (A) the generating unit; or
 - (B) an industrial complex of which the generating unit is a part;
 - or
 - (ii) directly connected to transmission facilities within the City of Medicine Hat,including all system elements from the terminal of the generating unit to the transmission facilities; and
 - (b) the operator of an aggregated generating facility that has a maximum authorized real power greater than or equal to 5 MW and where the generating unit is:
 - (i) connected to a switchyard at which system access service is provided to:
 - (A) the aggregated generating facility; or
 - (B) an industrial complex of which the aggregated generating facility is a part;
 - or
 - (ii) directly connected to transmission facilities within the City of Medicine Hat,including all system elements from the collector bus to the transmission facilities, and excluding the generating units and the collector system feeders;
- that has personnel who are responsible for the real time control of a generating unit or aggregated generating facility and directly or indirectly receives operating instruction from the ISO or operator of a transmission facility.

Background

New PER-006-AB-1 is being proposed for adoption in Alberta. Proposed new PER-006-AB-1 requires the operator of a generating unit or aggregated generating facility to provide training to personnel who are responsible for the real time control of the generating unit or aggregated generating facility, on the operational

functionality of protection systems and remedial action schemes that affect the output of the generating unit or aggregated generating facility.

The adoption of proposed new PER-006-AB-1 is important for maintaining the reliable operation of the interconnected electric system. The training of operating personnel on the protection systems that can affect the output of their machines can help expedite the restoration of a generating unit or aggregated generating facility to service or possibly help mitigate the loss of a machine during certain operating conditions.

The previous versions of reliability standards PRC-001-AB1-1, *Protection System Coordination* and PRC-001-AB2-1, *Protection System Coordination* contained a similar requirement. However, during the development of reliability standard PRC-001-AB3-1.3(ii), *Protection System Coordination* the AESO chose not to adopt this requirement for application in Alberta due to the requirement's ambiguous language. In Project 2007-06, the North American Electric Reliability Corporation ("NERC") retired reliability standard PRC-001, *Protection System Coordination*, and has revised the language of this requirement to make it more succinct and practical, adding the requirement into a new NERC reliability standard PER-006-1, *Specific Training for Personnel* ("NERC PER-006-1").

Summary of Proposed Changes

During the development of proposed new PER-006-AB-1, the AESO determined that an Alberta variance was required in order to ensure that NERC PER-006-1 is capable of being applied in Alberta and does not require a material change in the framework for the market for electric energy. A summary of this Alberta variance is as follows:

Alberta variance:

- The AESO is applying proposed new PER-006-AB-1 to all generating units and aggregated generating facilities with a maximum real power greater than or equal to 5 MW and are directly connected to the transmission system rather than to only those that are part of the bulk electric system for the following reasons:
 - there are non-bulk electric system generating units that are important for maintaining the reliable operation of the interconnected electric system; and
 - the requirement for an operator to be familiar with the identified protection systems and remedial action schemes can be helpful in the dependable operation of the generating units and aggregated generating facilities and in the restoration of these facilities following the operation of a protection system or remedial action scheme.

In addition, the AESO made amendments to ensure consistent use of defined terms as included in the AESO's [Consolidated Authoritative Document Glossary](#) ("CADG"). Administrative changes, such as formatting and grammatical corrections, have also been made in the proposed new PER-006-AB-1.

Defined Terms

When reviewing the attached proposed new PER-006-AB-1 Stakeholders should note that all defined terms appear **bolded**. Stakeholders are encouraged to refer to the AESO's CADG when reviewing proposed reliability standards to ensure they have an accurate understanding of those defined terms.

Implementation of Alberta reliability standards

In accordance with Section 19 of the *Transmission Regulation*, the reliability standards that apply in Alberta are those of the Electric Reliability Organization ("ERO") or any other reliability standards, to the extent that such reliability standards are adopted by the AESO after consultation with Stakeholders and after receipt of Commission approval. The NERC was certified as the ERO for the United States by the Federal Energy Regulatory Commission under the US *Energy Policy Act* of 2005. Further, the NERC was recognized as the ERO by the Minister of Energy in Alberta.

Reliability standards and definitions proposed for approval or rejection by the AESO are developed:

- (a) based on the reliability standards and definitions of the NERC; or
- (b) to amend, supplement or replace the NERC reliability standards or definitions.

For more information on the AESO's reliability standards, visit the AESO website at www.aeso.ca and follow the path Rules, Standards and Tariff > Alberta reliability standards.

Request for Comment

Please use the attached *Stakeholder Comment Matrix* when submitting comments to the AESO. Only written comments will be considered in finalizing proposed new PER-006-AB-1. Stakeholders should ensure that comments provided represent all interests within their organization. Please respond to the questions in the attached *Stakeholder Comment Matrix* and provide your specific comments, proposed revisions, and reasons for your position. Providing general comments does not give the AESO any specific issue to consider and address, and may result in a general response. The scope of comments is limited to proposed new PER-006-AB-1. Any comments received that are outside of this scope will not be considered by the AESO.

Stakeholders are asked to provide comments no later than **January 12, 2021** to ars_comments@aeso.ca. Adherence to deadlines is essential to the integrity of the comment process, and as such, the AESO may choose not to consider any Stakeholder comments received after the deadline.

The AESO will be publishing all comments received for industry review in January 2021. The AESO expects to publish replies to the comments with the final proposed new PER-006-AB-1 in February 2021.

If the AESO does not receive comments regarding proposed new PER-006-AB-1, the AESO expects to forward the proposed new PER-006-AB-1 to the Commission in January 2021, along with its recommendation that the Commission approve the proposed new PER-006-AB-1, to become effective the first day of the calendar quarter that follows 4 full calendar quarters after approval by the Commission.

Attachments to Consultation Letter

The following documents are attached:

1. [Stakeholder Comment Matrix](#) for proposed new PER-006-AB-1; and
2. [Proposed new PER-006-AB-1](#).

Sincerely,

Jodi Marshall

Legal Manager, ISO Rules and Alberta Reliability Standards

Email: ars_comments@aeso.ca

Attachments