

Proposed Amended Section 502.8 of the ISO rules, *SCADA Technical and Operating Requirements*

Date of Request for Comment:	<u>November 20, 2018</u>
Period of Comment:	<u>November 20, 2018</u> through <u>December 5, 2018</u>

Blackline of Suggested Rule Wording	Rationale	AESO Replies
<p>Suncor Energy Inc. (“Suncor”)</p> <p>All changes outside of Appendix 3 should be rejected.</p>	<p>The AESO has not provided the issue these amendments are intended to address, the purpose for these amendments, or any data/analyses to support these amendments as required by Alberta Utilities Commission Rule 017: <i>Procedures and Process for Development of ISO Rules and Filing of ISO Rules</i> (“AUC Rule 017”). Accordingly, Suncor is unable to assess whether Rule 502.8 should be amended.</p> <p>Suncor opposes any change to this Rule until it can be evaluated using the information the AESO is required to provide under AUC Rule 017.</p>	<p>The AESO identified both the overarching issue this amendment is intended to address, and the purpose for this amendment in its letter of notice. Specifically, the amendments to Section 502.8 of the ISO rules, <i>SCADA Technical and Operating Requirements</i> (“Section 502.8”) are intended to correct technical deficiencies, make administrative amendments, and include energy storage facilities, as identified in items in (b), (f), and (i) of the letter of notice respectively.</p> <p>The AESO is only required to provide any data or analyses that it actually has and which it considers to be “relevant to the need for, development of, removal of, or renewal of the proposed rule”. The AESO is not required to find data or conduct analyses to support the amendment.</p> <p>The AESO is in the process of determining whether any relevant data, analysis, or other material has been conducted or created. If it has been, the AESO will determine next steps which may include re-consulting on the proposed amendments in January and including any relevant supporting documents.</p>
<p>TransAlta Corporation (“TransAlta”)</p> <p>Appendix 3 – SCADA Requirements for Energy Storage Facilities</p>	<p>The AESO should conduct a separate consultation on the SCADA requirements for Energy Storage Facilities.</p> <p>We ask that the AESO conduct a separate consultation on SCADA requirement for Energy Storage Facilities to ensure</p>	<p>For information on the AESO’s approach to conducting stakeholder consultation for all Category 2 Rules as a package, please refer to the letter of notice posted on the AESO’s website on November 20, 2018.</p> <p>As indicated in the letter of notice, these are amendments to</p>

	<p>that the proposed requirements are reasonable and can be complied with. In our highlevel review, we note that most of the requirements are similar to those applied to other generating facilities and should be achievable. However, a separate consultation in which battery suppliers could participate would ensure the development of technically sound SCADA requirements. At a minimum, we request that a review of the requirements should be done in a process that is separate from the Category 2 rules filing.</p>	<p>existing energy and ancillary services markets rules that are not essential to establish and operate the capacity market. The AESO is not of the opinion that a separate consultation in relation to energy storage facilities is warranted at this time. All market participants, including battery suppliers, are encouraged to participate in the consultation of all ISO rules.</p>
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Please provide your comments on the following (as set out in AUC Rule 017 s. 7.2(b-j)):

Item #		Stakeholder comments	AESO Replies
1	whether you are of the view that proposed amended Section 502.8 of the ISO rules, <i>SCADA Technical and Operating Requirements</i> relates to the capacity market and why or why not	<p><u>TransAlta Corporation (“TransAlta”)</u></p> <p>The amendments do not directly relate to the capacity market.</p> <p>The proposed amendments relate to the addition of energy storage facilities.</p>	The AESO acknowledges TransAlta’s comment.
2	if the answer to item #1 is yes, whether you agree that proposed amended Section 502.8 of the ISO rules, <i>SCADA Technical and Operating Requirements</i> should or should not be in effect for a fixed term and why or why not	<p><u>TransAlta Corporation (“TransAlta”)</u></p> <p>Section 502.8 is a permanent ISO Rule and should not be in effect for only a fixed term.</p>	The AESO acknowledges TransAlta’s comment.
3	whether you understand and agree with the objective or purpose of proposed amended Section 502.8 of the ISO rules, <i>SCADA Technical and Operating Requirements</i> and whether, in your view, proposed amended Section 502.8 of the ISO rules, <i>SCADA Technical and Operating Requirements</i> meets the objective or purpose	<p><u>Suncor Energy Inc. (“Suncor”)</u></p> <p>The AESO has not provided the objective or the purpose for its proposed amendments to this rule. Accordingly, the appropriateness or effectiveness of the proposed amendments cannot be evaluated.</p>	See the AESO’s response to Suncor’s comment on Appendix 3 above.
		<p><u>TransAlta Corporation (“TransAlta”)</u></p> <p>A separate consultation should be held to review the SCADA requirements for energy storage facilities.</p> <p>We understand that the objective is to correct issues with the technical and operating requirements for certain assets and specify the requirements for energy storage facilities. However, as stated above, we believe that a separate consultation should be held to review the energy storage facility requirements as opposed to consulting on the new standard in a package of rules related to the capacity market.</p>	See the AESO’s response to TransAlta’s comment on Appendix 3 above.

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4	how, in your view, proposed amended Section 304.8 of the ISO rules, <i>Event Analysis</i> affects the performance of the capacity market and the electricity market	<p>TransAlta Corporation (“TransAlta”)</p> <p><u>We do not expect amendments to affect the performance of the capacity market or the electricity market.</u></p>	The AESO acknowledges TransAlta’s comment.
5	your views on any analysis conducted or commissioned by the AESO supporting proposed amended Section 502.8 of the ISO rules, <i>Markets Suspension or Limited Markets Operations</i>	<p>TransAlta Corporation (“TransAlta”)</p> <p>We are not aware of any analysis conducted or commissioned by the AESO supporting the proposed amendments to Section 502.8 and for that reason ask for a separate consultation to ensure that a comprehensive review of the requirements is conducted before the amendments are accepted into ISO Rules.</p>	See the AESO’s response to TransAlta’s comment on Appendix 3 above.
6	whether you agree with proposed amended Section 502.8 of the ISO rules, <i>SCADA Technical and Operating Requirements</i> taken together with all ISO rules and in light of the principle of a fair, efficient and openly competitive market	<p>TransAlta Corporation (“TransAlta”)</p> <p>Please see our response to Item #4 above.</p>	The AESO acknowledges TransAlta’s comment
7	whether you would suggest any alternatives to proposed amended Section 502.8 of the ISO rules, <i>Markets Suspension or Limited Markets Operations</i>	<p>TransAlta Corporation (“TransAlta”)</p> <p>Not at this time.</p>	The AESO acknowledges TransAlta’s comment.
8	if the answer to item #1 is yes, whether you agree that proposed amended Section 502.8 of the ISO rules, <i>SCADA Technical and Operating Requirements</i> supports ensuring a reliable supply of electricity at a reasonable cost to customers and why or why not	<p>TransAlta Corporation (“TransAlta”)</p> <p>Please see our response to Item #4 above.</p>	The AESO acknowledges TransAlta’s comment
9	whether you agree that proposed amended Section 502.8 of the ISO rules, <i>SCADA Technical and Operating Requirements</i> supports the public interest and why or why not	<p>TransAlta Corporation (“TransAlta”)</p> <p>We have not conducted any analysis at this time to assess whether the amendments support the public interest.</p>	The AESO acknowledges TransAlta’s comment.

Item #		Stakeholder comments	AESO Replies
10	whether you have any additional comments	<p><u>TransAlta Corporation (“TransAlta”)</u> No comments at this time.</p>	<p>The AESO acknowledges TransAlta’s comment.</p>