Stakeholder Comment Matrix – January 31, 2019

Proposed Amendments to Previously Approved PRC-005-AB-6, *Protection System, Automatic Reclosing and Sudden Pressure Relaying Maintenance* (" PRC-005-AB-6"), and rename as PRC-005-AB1-6, *Protection System, Automatic Reclosing and Sudden Pressure Relaying Maintenance* ("amended PRC-005-AB1-6")

Date of Request for Comment: January 31, 2019	Contact: Jenette Yearsley
Period of Comment: January 31, 2019 through February 15, 2019	Phone: (403) 387-8275
Comments From: AltaLink	Email: Jenette.Yearsley@AltaLink.ca
Date [yyyy/mm/dd]: February 15, 2019	

Listed below is the summary description of changes for the proposed amended PRC-005-AB1-6 Please refer back to the Consultation Letter under the "Attachments" section to view materials related to the proposed amended PRC-005-AB1-6. Please place your comments/reasons for position underneath (if any).

Alberta Reliability Standard PRC-005-AB1-6	Stakeholder Comments and/or Alternative Proposal

2. Applicability:

2.1 This **reliability standard** applies to:

(a) the **legal owner** of a **transmission facility**; that:

(i) is part of the bulk electric system, excluding a transformer that does not have its primary terminal and at least one secondary terminal energized at 100 kV or higher; or

(ii) is material to this **reliability standard** and to the **reliability** of either the **interconnected electric system** or the City of Medicine Hat electric system, as the **ISO** determines and includes on a list published on the AESO website, which the **ISO** may amend from time to time in accordance with the process set out in Appendix 3;

2.2 This **reliability standard** applies to the following devices**:**

(b) **protection systems** used for the **ISO**'s **underfrequency load shedding** program;

(c): **protection systems** used for **undervoltage load shed** systems installed to prevent system voltage collapse or voltage instability for the reliability of the **interconnected electric system**;

Appendix 1, Table 1-2

Any communications system necessary for correct operation of protective functions with continuous monitoring or periodic automated testing for the presence of the channel function, and alarming for loss of function (See Table 2).	12 calendar years	Verify that the communications system meets performance criteria pertinent to the communications technology applied (e.g. signal level, reflected power, or data error rate). Verify operation of communications system inputs and outputs that are essential to proper functioning of the **protection system**.

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Appendix 1, Tables 1-3 (the comment is also applicable to Tables 4.1 and

Comment # 1:

For section 2.1 (a) (i): The current bulk electric system definition excludes "radial transmission facilities serving only load with one (1) transmission source". As T-tapped load serving substations are radially connected to a single system element (the transmission line), they should be excluded from bulk electric system and the scope of PRC-005-AB1-6. Please confirm.

Comment # 2:

For section 2.1 (a) (ii): AltaLink suggests the AESO publish the ISO's current list of "extra transmission facilities" that would be included in 2.1(a)(ii) prior to the implementation of PRC-005 amendments. This would alllow AltaLink to assess any impacts of these "extra transmission facilities" to AltaLink's maintenance program.

Comment # 3:

The PRC-005-AB1-6 is not applicable to the legal owner of a distribution facility, nor does it explicitly indicate applicability to distributed UFLS/UVLS installed in facilities operated at 100 KV or lower. Therefore AltaLink's interpretation is that all requirements related to UFLS/UVLS and included in section 2.2 (b) and 2.2 (c) are not applicable to the UFLS/UVLS schemes deployed at 99 kV and lower levels Please confirm.

Comment # 4:

AltaLink interprets that this requirement is not applicable to devices and communication circuits used for sending Transfer Trips (generally as part of anti-islanding scheme or protection transfer trip) from distribution substations to the Independent Power Producers (IPPs) operated below 100 kV. Please confirm.

Comment # 5:

AltaLink's interpretation of the term "independent ac measurement" is outlined below. Please