Stakeholder Comment Matrix for Additional Feedback

Period of Comment: July 25, 2019 through September 5, 2019 **Comments From:** ATCO Power Canada Ltd. **Date [yyyy/mm/dd]:** 2019/09/05	**Contact:** Kurtis Glasier **Phone:** (587) 228-9617 **Email**: Kurtis.Glasier@atco.com

Instructions:

1. **Please fill out the section above as indicated.**
2. **Please refer back to the *Letter of Notice of Proposed New and Amended ISO Rule* under the "Attachments" section to view the actual draft of the proposed new Section 502.17.**
3. **Please refer to the *Stakeholder Comment Matrix for Additional Feedback Attachment ("Attachment")* for further information regarding AESO assumptions and instructions for completing the sections below.**
4. **Please respond to the questions below and provide your specific comments, proposed revisions, and reasons for your position underneath, if any. Blank boxes will be interpreted as favourable comments.**
5. **Please be advised that general comments do not give the AESO any specific issue to consider and address, and results in a general response.**

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	AESO's Preferred Orderwire Architecture ***Cost and Timeline to implement and operate the mesh option orderwire architecture.*** Please provide: (a) the implementation cost and implementation timeline; and (b) the operational cost; of the AESO's preferred orderwire architecture mesh option using the assumptions and architecture provided in the Attachment. Please include all assumptions used for the list of variables provided in the Attachment. Where possible, provide a breakdown of the cost and implementation timing by proposed new Section 502.17 requirements. If you are unable to provide the costs and timeline of complying with a proposed new Section 502.17	

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	requirement, please state that requirement and why you are unable to provide the information at this time. Please list any issues related to budgetary cycles separately. ***Please indicate which type of stakeholder you are:*** ☐ ***Operator of a transmission facility*** ☒ ***Operator of a generating unit or operator of an aggregated generating facility with a maximum authorized real power ("MARP") of 5 MW or greater*** ☐ ***Other (please specify in the comments)***	
2	***Orderwire Architecture Options*** Which of the following orderwire architecture options do you support, if any: ☒ Mesh Option ☐ Operator of a Transmission Facility Hub Option ☐ AESO Hub Option ☐ Other (please provide details in the comments) The architecture for the first 3 options can be found in the Attachment. Please provide the rationale for your opinion or suggest an alternative option.	If an orderwire is needed at this time, ATCO Power is supportive of the Mesh Option proposed by the AESO. The advantage of the Mesh Option is that it does not rely on single points of failure. Rather, multiple connections between networks allow for reliability in the event of concurrent contingency events.
3	***Stakeholder's Preferred Orderwire Architecture Option*** ***If you do not support the AESO's preferred mesh option, please provide the cost and timeline to implement and operate the orderwire architecture option you support.*** Please provide: (a) the implementation cost and implementation timeline; and	Not applicable as ATCO Power supports the Mesh Option.

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	(b) the operational cost; of the Orderwire architecture option. Please provide all assumptions used to determine the costs and timeline, including your assumptions for the list of variables provided in the Attachment. Where possible, provide a breakdown of the cost and implementation timing by proposed new Section 502.17 requirements. If you are unable to provide the costs and timeline of complying with a proposed new Section 502.17 requirement, please state that requirement and why you are unable to provide the information at this time. Please list any issues related to budgetary cycles separately. ***Please indicate which type of stakeholder you are:*** ☐ ***Operator of a transmission facility*** ☒ ***Operator of a generating unit or operator of an aggregated generating facility with a maximum authorized real power ("MARP") of 5 MW or greater*** ☐ ***Other (please specify in the comments)***	
4	***Availability Requirements*** Whether you agree with the availability targets set out in subsection 8, *Performance and Maintenance of Primary and Backup Voice Communication Systems*, of the proposed new Section 502.17. Please explain why or why not. If you do not agree, please provide suggested changes and the rationale for your suggestion.	The availability requirements do not specify the time period over which the requirement will be measured or applied. By way of example for generating units greater than or equal to 300MW of maximum authorized real power, the minimum availability for the primary voice communication systems is 98%. This requirement should specify that this is an annual minimum availability, by which a 98% availability means the primary voice communication system is available for at least 8,584.8 hours over the year.
5	***Extended Power Outage Requirements*** Whether you agree with the requirements for market participants during extended power outages of its facilities set out in subsection 9, *Extended Power Outage*, of the proposed new Section 502.17. Please explain why or why not. If you do not agree, please provide	

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	suggested changes and the rationale for your suggestion.	
6	***Operational Requirements*** Whether you agree that the proposed new Section 502.17 effectively captures the ongoing operational requirements of the proposed architecture. Please explain why or why not. If you do not agree, please provide suggested changes and the rationale for your suggestion.	
7	***Utility Orderwire Description*** Whether you agree with the AESO's description of "utility orderwire" as: (a) a service that is independent of external commercial telecommunication services such that continued operation, during an extended power outage, can be assured and restoration activities are internally controlled; (b) being able to leverage the existing utility telecommunication network infrastructure, including fibre, microwave, routers, and phone switches; and (c) including, if applicable, leased assets, such as dark fibre and tower access from 3rd party providers, where the active telecommunication equipment (router, radio, batteries, etc.) is controlled by the market participant.	ATCO Power does not agree with the AESO's decision to implement an orderwire service structure. The AESO should first consult on whether an orderwire structure is necessary, rather than accepting an orderwire structure and consulting on which structure to implement. ATCO Power recommends further consultation on whether an orderwire structure is necessary as there are significant costs to new equipment and satellite contracts that would be considered stranded. Only after consultation on whether an orderwire is a necessary development should the AESO then consult on the preferred architecture option. ATCO Power is not satisfied that 300 MWs is the appropriate threshold to dicate that an orderwire must be used. As a general principle ATCO Power supports a level paying field among generators, any bright line test must be appropriately justified. Further, ATCO Power believes a more succinct definition of "utility orderwire" would be "a dedicated, non-commercial, communication channel". It does not seem necessary to have the nuanced and specific definition that the AESO is suggesting.

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8	***Other*** Please provide any other feedback or suggestions you have on the proposed new Section 502.17. Please provide the rationale for your suggestion.	In the proposed Section 502.17, subsection 2(1) it states the "ISO may require a market participant to comply with any additional requirements of this section 502.17 if the ISO determines that such a compliance is necessary for the safe and reliable operation of the interconnected electric system." ATCO Power does not believe this is a reasonable inclusion within an ISO Rule. The ISO Rules should contain all requirements that a market participant will be bound by during its operation in the interconnected electric system. If the ISO requires the discretion to create requirements specific to individual circumstances, then it should have to outline this process to ensure it is done in a transparent and fair way. Proper governance of AESO requirements mean that every mandatory requirement must be a part of a ISO Rule and go through the AUC approval process.

<u>Information Document</u> - The AESO intends to develop an information document to accompany the proposed new Section 502.17. At a minimum, the AESO suggests that such an information document would contain descriptions of a utility orderwire and a control room for generators. Please provide your views on the type of content that should be included in an information document associated with the proposed new Section 502.17. Please provide the rationale for your suggestion.

Please see ATCO Power's comment to question 7 above regarding the description of a "utility orderwire".