

Date of Request for Comment:	<u>December 7, 2020</u>	Contact:	<u>Shannon Ferdinand</u>
Period of Comment:	<u>December 7, 2020</u> through <u>January 12, 2021</u>	Phone:	<u>780-392-5442</u>
Comments From:	<u>Capital Power Corporation</u>	Email:	<u>sferdinand@capitalpower.com</u>
Date [yyyy/mm/dd]:	<u>January 12, 2021</u>		

Instructions:

1. Please fill out the section above as indicated.
2. Please refer back to the Consultation Letter under the “Attachments” section to view materials related to the proposed new PER-006-AB-1, *Specific Training for Personnel* (“new PER-006-AB-1”).
3. 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.
4. Please be advised that general comments do not give the AESO any specific issue to consider and address, and results in a general response.

Alberta Reliability Standard	Stakeholder Comments and/or Alternative Proposal
<p>1. Is the requirement contained in proposed new PER 006-AB-1 clearly articulated? If no, describe the concern and suggest alternative language.</p>	<p>Capital Power appreciates the opportunity to provide comments. With the exception of applicability, the proposed new PER-006-AB-1 standard is consistent with the NERC version of the same standard. Capital Power has no concern with the proposed requirement but offers comments on how this standard should be applied to Market Participants below.</p>
<p>2. Do you have any additional comments regarding proposed new PER-006-AB-1? If yes, please specify.</p>	<p>According to NERC, generating units connected to the transmission system below 100kV are <u>not</u> part of the Bulk Electric System (BES) and are, therefore, not applicable to NERC Reliability Standards. Based on NERC's Rules of Procedure¹, including entities that are not part of BES within the scope of the NERC Reliability Standards is disproportionate to their impact and risk to the reliable operation of the interconnected BES.</p> <p>The AESO defines the BES using the same 100kV threshold as NERC, yet unlike NERC the AESO does not use their own BES definition as the applicability criteria for Alberta Reliability Standards (ARS). The AESO continues to apply many ARS², including PER-006, based on criteria inconsistent with their definition of the Bulk Electric System (i.e. a much lower transmission system connection (≥ 25 kV) and / or lower generating capability (i.e. PER-006 = 5MW)). This approach to applicability is inconsistent with NERC and may not correlate to the risk posed by these non-BES assets.</p> <p>Capital Power recommends that the applicability of ARSs should be unified and based on risk, as defined by their connection to the BES. In line with this, Capital Power recommends that PER-006-AB-1 should not be applicable to those generating units that do not fit into the definition of the BES.</p>

¹ See Appendix 5B of the [NERC Rules of Procedure](#)

² ARSs that apply to generating entities connected to the Transmission System include PRC-004, PRC-005, PRC-019, VAR-002 and VAR-002-WECC