

July 19, 2018

To: Market Participants and Other Interested Parties

Re: Consultation Letter – Proposed Amended Alberta Reliability Standard PRC-004-AB2-1, *Analysis and Mitigation of Transmission and Generation Protection System Misoperation* ("PRC-004-AB2-1")

Section 19 of the *Transmission Regulation* requires the Alberta Electric System Operator ("AESO") to consult with market participants likely to be directly affected by the AESO's adoption or making of Alberta reliability standards, and also requires the AESO to forward the proposed Alberta reliability standards to the Alberta Utilities Commission ("AUC" or "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 market participants on the attached proposed PRC-004-AB2-1.

Applicability

The proposed PRC-004-AB2-1 is applicable to:

- (a) the legal owner of a transmission facility;
- (b) the legal owner of a generating unit that:
 - (i) is not part of an aggregated generating facility;
 - (ii) has a maximum authorized real power rating greater than 4.5 MW;
 - (iii) is directly connected to the transmission system or to transmission facilities within the City of Medicine Hat; and
 - (iv) has protection systems that directly affect the reliability of the bulk electric system;
- (c) the legal owner of an aggregated generating facility that:
 - (i) is directly connected to the transmission system or to transmission facilities within the City of Medicine Hat;
 - (ii) has a maximum authorized real power rating greater than 4.5 MW; and
 - (iii) has protection systems that directly affect the reliability of the bulk electric system; and
- (d) the AESO.

Background

The purpose of existing PRC-004-AB1-1, *Analysis and Mitigation of Transmission and Generation Protection System Misoperation* ("PRC-004-AB1-1") is to ensure all misoperations of transmission and generation protection systems affecting the reliability of the bulk electric system are analyzed and mitigated. The existing PRC-004-AB1-1 has been amended to provide clarification on certain requirements to assist with compliance.

Summary of Proposed Changes

The AESO has determined that clarification was required to ensure the protections system misoperations that must be analyzed are those affecting the reliability of the bulk electric system. Additionally, that the

protection systems which require such analysis and reporting to the AESO are not limited to those protection systems that measure electrical quantities, voltage or current, but also include protection systems that measure non-electrical quantities. Proposed amended PRC-004-AB2-1 will assist the legal owners that are the subject of the reliability standard by providing the appropriate clarifications on the requirements and will enable the AESO to more effectively monitor compliance.

The AESO determined that certain administrative amendments were required while drafting amended PRC-004-AB2-1. A summary of these administrative amendments are as follows:

- existing PRC-004-AB1-1 is being renamed PRC-004-AB2-1;
- amendments to ensure consistent use of defined terms as included in the AESO's [Consolidated Authoritative Document Glossary](#) ("CADG").
- formatting and grammatical corrections; and
- the deletion of the following sections:
 - a) "Definitions";
 - b) "Processes and Procedures",
 - c) "Appendices"; and
 - d) "Guidelines".

Defined Terms

When reviewing the attached proposed amended PRC-004-AB2-1, market participants should note that all defined terms appear **bolded**. Market participants and other interested parties are encouraged to refer to the AESO's CADG when reviewing proposed Alberta 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 market participants 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.

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 Market Participant Comment Matrix when submitting comments to the AESO. Only written comments will be considered in finalizing proposed amendments to PRC-004-AB2-1. Market participants should ensure that comments provided represent all interests within their organization. The scope of comments is limited to proposed amendments to PRC-004-AB2-1. Any comments received that are outside of this scope will not be considered by the AESO.

Market participants are asked to provide comments no later than **August 3, 2018** to ars_comments@aeso.ca. Adherence to deadlines is essential to the integrity of the Alberta reliability standard comment process. As

such, any market participant comments received after August 3, 2018, may not be published, replied to, or otherwise considered by the AESO.

The AESO will be publishing all comments received for industry review in August. The AESO expects to publish replies to the comments with the final proposed amended PRC-004-AB2-1 in August 2018.

If the AESO does not receive comments regarding proposed amendments to PRC-004-AB2-1, the AESO expects to forward the final proposed amended PRC-004-AB2-1 to the Commission in August 2018, along with its recommendation that the Commission approve the final proposed amended PRC-004-AB2-1, to become effective the first day of the calendar quarter (January 1, April 1, July 1 or October 1) that follows one full calendar quarter after approval by the Commission.

Attachments to Consultation Letter

The following documents are attached:

1. [Market Participant Comment Matrix](#) for proposed amended PRC-004-AB2-1; and
2. [Blackline](#) and [clean](#) copies of proposed amended PRC-004-AB2-1

Sincerely,

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Attachments