

May 29, 2019

To: Alberta Utilities Commission (“AUC” or “Commission”)

Re: Forwarding Notice – Amendments to Previously Approved PRC-005-AB-6 *Protection System, Automatic Reclosing and Sudden Pressure Relaying Maintenance* (“previously approved 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”)

The Alberta Electric System Operator (“AESO”) recommends that the Commission approve the proposed amended PRC-005-AB1-6, pursuant to Section 19 of the *Transmission Regulation*.

As the North American Electric Reliability Corporation (“NERC”) is recognized as the Electric Reliability Organization (“ERO”) by the Minister of Energy in Alberta, the AESO reviews the NERC reliability standards as they are approved by the Federal Energy Regulatory Commission (“FERC”) and recommends to the Commission whether, when and how they should be adopted in Alberta based on the applicable requirements of the *Transmission Regulation*.

Background

On July 24, 2018, the AESO forwarded PRC-005-AB-6, recommending approval of the reliability standard. The Commission registered this filing as Application 23767-A001 and designated it as Proceeding 23767. No objections were received and the reliability standard was approved as recommended by the AESO in the Commission’s Decision 23767-D01-2018, dated August 24, 2018, with an effective date of October 1, 2019.

Subsequent to receiving the Commission’s approval of PRC-005-AB-6 on August 24, 2018, the AESO reviewed the reliability standard in order to provide clarification to a stakeholder and discovered that amendments were required to the implementation plan to include references to Tables 4 and 5 that were missing from section 5.5 in Appendix 5. The reference was added to apply a phased implementation for devices in Tables 4 and 5 that have a 12 year maximum maintenance interval. Without the references to Table 4 and 5, maintenance on all of the applicable devices would not be required to be completed until the end of the 12th year. Additional amendments were also made for clarity and corrections as listed in the summary of proposed changes below. On January 31, 2019, the AESO issued a consultation letter for the proposed amendments to previously approved PRC-005-AB-6, and rename as amended PRC-005-AB1-6.

Stakeholder comments on the proposed amended PRC-005-AB1-6 were received and posted on the AESO website on February 19, 2019. In its March 19, 2019 reply letter, the AESO provided replies to all stakeholder comments received. As a result of the comments received, the AESO made further amendments to the reliability standard and re-consulted on those amendments.

Specifically, the AESO received a comment regarding the application of the proposed amended PRC-005-AB1-6 to underfrequency load shed and under voltage load shed protection systems deployed at voltage levels below 100 kV. Applicability section 2.2 of proposed amended PRC-005-AB1-6 related to the types of protection devices, includes underfrequency load shed and under voltage load shed protection systems; however applicability section 2.1, related to entities, only applies to the legal owner of a transmission facility that is part of the bulk electric system. Therefore, it may not be clear whether the proposed amended PRC-005-AB1-6 would apply to underfrequency load shed and under voltage load shed protection systems associated with system elements energized below the general bulk electric system voltage level of 100 kV.

Similarly, it may not be clear whether the proposed amended PRC-005-AB1-6 would apply to protection systems installed as a remedial action scheme, including automatic reclosing, associated with system elements energized below the general bulk electric system voltage level of 100 kV.

The primary purpose of the latest amendments is to clarify that proposed amended PRC-005-AB1-6 applies not only to the legal owner of a transmission facility that is part of the bulk electric system, but also to the legal owner of a transmission facility that is not part of the bulk electric system and owns an under voltage load shed protection system, underfrequency load shed protection system, or protection systems installed as a remedial action scheme, including automatic reclosing, as described in proposed amended PRC-005-AB1-6.

Also included in the re-consultation was an amendment made to Applicability section 2.1(a)(i) to add clarity to the exemption language for transformers.

Summary of Proposed Changes

Upon review of the implementation plan and previously approved PRC-005-AB-6 in general, the AESO made the following Alberta variance and administrative amendments:

Alberta variance:

- added a provision in 2.1(a)(ii) to enable the AESO to apply proposed amended PRC-005-AB1-6 to transmission facilities below the bulk electric system level as the AESO determines to be material to this reliability standard and to the reliability of either the interconnected electric system or City of Medicine Hat electric system.

Administrative amendments:

- previously approved PRC-005-AB-6, *Protection System, Automatic Reclosing and Sudden Pressure Relaying Maintenance* is being renamed PRC-005-AB1-6 *Protection System, Automatic Reclosing and Sudden Pressure Relaying Maintenance*;
- added clarity by moving the reference to the bulk electric system and the exclusion of certain types of transformers from Applicability section 2.2(a) to 2.1(a)(i);
- references to Tables 4 and 5 were missing from section 5.5 of the implementation plan in Appendix 5. The AESO added in the references in the amendment;
- added a reference to section 2.1(a)(ii) in Appendix 3, *Amending Process for List of Facilities*, to reference the new subsection added as described in the previous bullet;
- added a reference to transmission facility in items (a) and (b) of Appendix 3 *Amending Process for List of Facilities*;
- corrected a typo in Appendix 3 to refer to subsection 2.1(b)(vi) instead of 2.1(iv); and
- replaced the descriptions of the compliance dates in Appendix 5, *Implementation Plan*, with the actual calendar dates.

Subsequent to the stakeholder re-consultation on proposed amended PRC-005-AB1-6 that commenced on March 28th, the AESO made the following two corrections to references in Appendix 3, of the final version of PRC-005-AB1-6:

- corrected reference in Appendix 3 from 2.1(a)(ii) to 2.1(a)(iii); and
- corrected reference in Appendix 3 from 2.1(b)(vi) to 2.1(b)(iv).

Summary of AESO Consultation

On January 31, 2019, the AESO posted a Consultation Letter on its website requesting written comments from stakeholders with respect to the proposed amended PRC-005-AB1-6 and notified stakeholders in the *AESO Stakeholder Newsletter*.

On February 19, 2019, the AESO posted the written comments received from stakeholders, in response to the *Consultation Letter*, on its website and notified stakeholders in the *AESO Stakeholder Newsletter*.

On March 19, 2019, the AESO posted its replies to stakeholder comments, including proposed amended PRC-005-AB1-6, on its website and notified stakeholders in the *AESO Stakeholder Newsletter*. Please see the *AESO Reply to Stakeholder Comments Letter* for a summary of replies to written comments received, as well as the rationale or basis for the position of the AESO that explains why certain positions were rejected or accepted.

On March 28, 2019, the AESO posted a *Re-Consultation Letter* on its website requesting written comments from stakeholders with respect to the proposed amended PRC-005-AB1-6 and notified stakeholders in the *AESO Stakeholder Newsletter*.

On April 18, 2019, the AESO posted the written comments received from stakeholders, in response to the *Re-Consultation Letter*, on its website and notified stakeholders in the *AESO Stakeholder Newsletter*.

On May 14, 2019, the AESO posted its replies to stakeholder comments, including the final proposed amended PRC-005-AB1-6, on its website and notified stakeholders in the *AESO Stakeholder Newsletter*. Please see the *AESO Reply to Stakeholder Comments Letter* for a summary of replies to written comments received, as well as the rationale or basis for the position of the AESO that explains why certain positions were rejected or accepted.

Attachments to Forwarding Notice

The following documents are attached to this Forwarding Notice:

1. January 31, 2019 [Consultation Letter](#);
2. February 19, 2019 [Stakeholder Comments on Consultation Letter](#);
3. March 19, 2019 [AESO Reply to Stakeholder Comments Letter](#);
4. March 28, 2019 [Re-Consultation Letter](#);
5. April 18, 2019 [Stakeholder Comments on Re-Consultation Letter](#);
6. May 14, 2019 [AESO Reply to Stakeholder Comments Letter on Re-Consultation](#); and
7. [Blackline](#) and [clean](#) copies of proposed amended PRC-005-AB1-6.

Proposed Effective Date

The AESO recommends that the Commission approve the proposed amended PRC-005-AB1-6 to become effective as set out in the implementation plan, which is the same as the effective date in the current PRC-005-AB-6.

The AESO submits that the proposed amended PRC-005-AB1-6 complies with the requirements of the *Transmission Regulation*, is not technically deficient and is in the public interest.

Should you have any questions or concerns, please do not hesitate to contact the undersigned.

Sincerely,

"Melissa Mitchell-Moisson"

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Regulatory Administrator
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Attachments