

April 26, 2018

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

Re: Forwarding Notice – Proposed:

- a) **New Alberta Reliability Standard MOD-031-AB-2, *Demand and Energy Data* (“new MOD-031-AB-2”); and**
- b) **Retirement of Existing Alberta Reliability Standards:**
 - 1. **MOD-016-AB-1.1, *Documentation of Data Reporting Requirements for Actual and Forecast Demands, and Net Energy for Load*;**
 - 2. **MOD-017-AB-0.1, *Aggregated Actual and Forecast Demands and Net Energy for Load*;**
 - 3. **MOD-018-AB-0, *Reports of Actual and Forecast Demand Data*; and**
 - 4. **MOD-019-AB-0, *Forecasts of Interruptible Demands Data***
(collectively known as “existing MOD Standards”)

The Alberta Electric System Operator (“AESO”) recommends that the Commission approve the:

- (a) adoption of proposed new MOD-031-AB-2; and
- (b) retirement of the existing MOD Standards,

pursuant to Section 19 of the *Transmission Regulation*.

Applicability

The proposed new MOD-031-AB-2 is applicable to the AESO.

Background

The AESO has determined that the adoption of proposed new MOD-031-AB-2 will replace the requirements contained in the existing MOD Standards. Currently, the existing MOD Standards require the AESO to provide historical and forecast load data and information, such as an explanation for certain growth rates in the forecast and curtailable loads, to the Western Electricity Coordinating Council (“WECC”). Proposed new MOD-031-AB-2 maintains the requirement to provide the WECC with historical and forecast load data. However, proposed new MOD-031-AB-2 streamlines the requirements, aligning them with the latest requests from the WECC and removing unclear wording.

Summary of Proposed Changes

Proposed new MOD-031-AB-2 was developed based on the North American Electric Reliability Corporation (“NERC”) reliability standard MOD-031-2, *Demand and Energy Data* (“NERC MOD-031-2”). The following Alberta variances have been identified as being required to ensure that NERC MOD-031-2 is capable of being applied in Alberta and does not require a material change in the framework for the market for electric energy. A summary of these Alberta variances is as follows:

- Requirement R1 is not being adopted for the following reasons:
 - From the list of applicable entities in requirement R1.1, (i) the AESO is the Transmission Planner and the Balancing Authority in Alberta, and (ii) there are no Load Serving Entities

within Alberta, as defined in the NERC glossary of terms. Therefore, the only applicable entity for which this requirement could apply would be Distribution Providers (legal owner of an electric distribution system). The AESO currently collects the information required within requirement R1 for load settlement, and does not need to collect it through a formal request to the legal owner of an electric distribution system.

- The required total internal demand data and net energy for load data, associated with requirement R1.3.2 is currently provided to the AESO through Section 502.8 of the ISO rules, *SCADA Technical and Operating Requirements* and AUC Rule 021, *Settlement System Code Rules*;
 - The AESO does not have formal demand side management programs which align with requirement R1.3.4. However, in order to provide the required historical and forecast load data to the WECC the AESO will collect the data associated with any controllable and dispatchable demand side management from within the AESO. As such, the AESO does not need to issue a data request to entities in its area for the data as specified in requirement R1.3; and
 - The AESO currently has the ability to direct the legal owner of an electric distribution system to provide the forecast data identified in requirement R1.4 and the explanations in requirement R1.5 under Section 14 of the *Transmission Regulation*.
- Requirement R2 is not being adopted as the requirements within are dependent on requirement R1.
 - Requirement R3 was modified to include the type of data and summary explanations, as identified in NERC requirement R1, that the AESO is to provide to the WECC upon request.
 - Requirement R4 is not being adopted as the requirements within are dependent on requirement R1.

Further variances modify the language of the MOD-031-AB-2 standard to clarify the requirements of the AESO to provide the required data and information to the WECC (instead of saying “applicable entity” etc.).

AESO Consultation

It is the AESO’s view that market participants are not likely to be directly affected by the proposed new MOD-031-AB-2 and retirement of existing MOD Standards. Accordingly, no formal consultation with market participants was undertaken.¹

On April 12, 2018, the AESO posted a notification in the AESO Stakeholder Newsletter informing market participants and other interested parties that it would not be consulting on the proposed new MOD-031-AB-2 and retirement of existing MOD Standards, and would forward the proposed new MOD-031-AB-2 and retirement of existing MOD Standards, to the Commission on April 26, 2018.

Proposed Effective Date

The AESO recommends that the Commission approve the proposed new MOD-031-AB-2 and retirement of existing MOD Standards to become effective on the first day of the month that follows 60 days after approval by the Commission.

¹ Section 19(4) of the *Transmission Regulation* states that, before adopting or making a reliability standard, “the ISO must consult with those Market Participants that it considers are likely to be directly affected”

The AESO submits that the proposed new MOD-031-AB-2 and the retirement of existing MOD Standards complies with the requirements of the *Transmission Regulation*, is not technically deficient, and is in the public interest.

Attachments to Forwarding Notice

The following documents are attached to this Forwarding Notice:

1. [Clean copy](#) of proposed new MOD-031-AB-2;
2. [Copy](#) of existing MOD-016-AB-1.1;
3. [Copy](#) of existing MOD-017-AB-0.1;
4. [Copy](#) of existing MOD-018-AB-0; and
5. [Copy](#) of existing MOD-019-AB-0
6. [April 12, 2018, copy of AESO Stakeholder Newsletter](#).

If you have any questions, please contact the undersigned.

Sincerely,

"Maria Gray"

Maria Gray
Regulatory Analyst
Phone: 403-776-7517
Email: maria.gray@aeso.ca

Attachments