

June 19, 2019

To: Alberta Utilities Commission (“Commission”)

Re: Forwarding Notice:

1. **Proposed removal of reliability standard Definitions “real time” and “operational planning analysis”;**
2. **Proposed amendments to existing reliability standards to remove bolding in the following;**
 - (a) **EOP-005-AB-2, *System Restoration from Blackstart Resources*;**
 - (b) **FAC-008-AB-3, *Facility Ratings*;**
 - (c) **FAC-011-AB-2, *System Operating Limits Methodology for the Operations Horizon*;**
 - (d) **PER-003-AB-1, *Operations Personnel Credentials*;**
 - (e) **PER-005-AB-2, *Operations Personnel Training*; and**
 - (f) **VAR-001-AB-4, *Voltage and Reactive Control*;**

(“collectively referred to as “associated existing reliability standards”)

The Alberta Electric System Operator (“AESO”) recommends that the Commission approve the proposed removal of “real time” and “operational planning analysis” definitions and amendment of the associated existing reliability standards, pursuant to Section 19 of the *Transmission Regulation*.

Consistent with the AESO’s drafting principles for authoritative documents, the AESO has determined that it is appropriate for defined terms used in the Alberta reliability standards to go through the same consultation and forwarding process as the Alberta reliability standards themselves. Accordingly, the AESO is forwarding the attached proposed removal of “real time” and “operational planning analysis” definitions from the [Consolidated Authoritative Document Glossary](#) (“CADG”) and the unbolding of same in the associated existing reliability standards.

Background

“Real time” is currently a defined term in the CADG that is used in a number of reliability standards but there is no consistency in how it is represented. For example, it is represented as both bolded and unbolded, and as hyphenated and unhyphenated.

The AESO is of the opinion that the existing definition of “real time” does not add anything to the common meaning of the words and that there is no risk of confusion or misunderstanding if the definition is deleted from the CADG.

The following existing reliability standards are proposed for amendment at this time to remove the bolding of “real time”:

- EOP-005-AB-2, *System Restoration from Blackstart Resources*
- FAC-008-AB-3, *Facility Ratings*
- FAC-011-AB-2, *System Operating Limits Methodology for the Operations Horizon*
- PER-003-AB-1, *Operations Personnel Credentials*
- PER-005-AB-2, *Operations Personnel Training*
- VAR-001-AB-4, *Voltage and Reactive Control*

“Operational planning analysis” is also currently a defined term in the CADG. While the definition includes a narrative that helps explain how and when to perform an operational planning analysis, that narrative is not a definition.

The AESO is of the opinion that the existing definition of “operational planning analysis” does not add anything to the common meaning of the words and that there is no risk of confusion or misunderstanding if the definition is deleted from the CADG.

With the proposed adoption of the upcoming new IRO reliability standards, which are only applicable to the ISO, the AESO does not intend to use “operational planning analysis” as a defined term and its use in the next versions of IRO-008 and IRO-010 will be unbolded. Given the proposed adoption of the new IRO reliability standards this year, the AESO is currently proposing to retire the existing IRO-008-AB-1 and IRO-010-AB-1a. Hence, these existing reliability standards are not being amended at this time to unbold “operational planning analysis”.

AESO Consultation

On May 2, 2019 the AESO posted a [Consultation Letter](#) on its website requesting written comments from market participants and other interested parties with respect to the proposed removal of “real time” and “operational planning analysis” definitions and amendment of the associated existing reliability standards, and notified market participants in the AESO Stakeholder Newsletter.

No comments were received from market participants; therefore, no additional changes have been made to the final proposed removal of “real time” and “operational planning analysis” definitions and amendment of the associated existing reliability standards.

Proposed Effective Date

The AESO recommends that the Commission approve the proposed removal of “real time” and “operational planning analysis” definitions and amendment of the associated existing reliability standards to become effective on December 1, 2019. The AESO is proposing to keep the current effective dates in place for FAC-008-AB-3, *Facility Ratings*, but to remove the bolded definitions effective December 1, 2019.

The AESO submits that the proposed removal of “real time” and “operational planning analysis” definitions and amendment of the associated existing reliability 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. May 2, 2019 Consultation Letter;
2. Clean copy of proposed removal of “real time” and “operational planning analysis” definitions;
3. Blackline and clean copies of proposed amended EOP-005-AB-2, *System Restoration from Blackstart Resources*;
4. Blackline and clean copies of proposed amended FAC-008-AB-3, *Facility Ratings*;
5. Blackline and clean copies of proposed amended FAC-011-AB-2, *System Operating Limits Methodology for the Operations Horizon*;
6. Blackline and clean copies of proposed amended PER-003-AB-1, *Operations Personnel Credentials*;
7. Blackline and clean copies of proposed amended PER-005-AB-2, *Operations Personnel Training*; and

8. Blackline and clean copies of proposed amended VAR-001-AB-4, *Voltage and Reactive Control*.

If you have any questions, please contact the undersigned.

Sincerely,

"Melissa Mitchell-Moisson"

Melissa Mitchell-Moisson

Regulatory Administrator

Phone: 403-539-2948

Email: Melissa.mitchell-moisson@aeso.ca

Attachments