

August 8, 2019

To: Market Surveillance Administrator, Market Participants and Other Interested Parties
("Stakeholders")

Re: **Letter of Notice – Development of proposed amended Section 305.1 of the ISO rules, *Energy Emergency Alerts* ("Section 305.1")**

Pursuant to Section 4 of Alberta Utilities Commission Rule 017: *Procedures and Process for Development of ISO Rules and Filing of ISO Rules with the Alberta Utilities Commission*, the Alberta Electric System Operator ("AESO") is providing notice and seeking feedback from Stakeholders on the proposed amendments to Section 305.1.

Issue

The AESO is in the process of developing a new Alberta reliability standard based on North American Electric Reliability Corporation ("NERC") EOP-011-1 *Emergency Operations* ("EOP-011-1") in Alberta to align with the current NERC standards. Attachment 1 of NERC EOP-011-1 details the process and descriptions for Energy Emergency Alert levels. Currently, the AESO details Energy Emergency Alert levels and declarations in Section 305.1, resulting in duplication of requirements.

Purpose

The purpose of the proposed amendments to Section 305.1 is to remove duplicative content between Section 305.1 and the Alberta version of NERC EOP-011-1.

Background

The AESO consulted on Section 305.1 as part of the development of the ISO rules to establish and operate the capacity market in August 2018. However, in July 2019, the Alberta Government announced that the capacity market would not be implemented in Alberta. The Alberta Utilities Commission subsequently approved the AESO's request to withdraw its application for approval of the ISO rules to establish and operate the capacity market, including proposed amended Section 305.1.

The AESO is currently developing a number of future NERC standards, including the Alberta version of EOP-011-1, which has overlapping provisions with existing Section 305.1. The development of EOP-011-1 in Alberta relates to the development of the following Authoritative Documents:

- a) The retirement of existing Alberta reliability standards:¹
 - EOP-001-AB1-2.1b, *Emergency Operations Planning*;
 - EOP-002-AB1-2, *Capacity and Energy Emergencies*;
 - EOP-003-AB1-1, *Load Shedding Plans*;
 - PRC-009-AB-0, *UFLS Performance Following an Underfrequency Event*; and
 - PRC-010-AB-0, *Assessment of the Design and Effectiveness of UVLS Program*.
- b) The adoption of the following NERC reliability standards:²
 - NERC PRC-010-2, *Undervoltage Load Shedding*,

¹ <https://www.aeso.ca/rules-standards-and-tariff/alberta-reliability-standards/>
² <https://www.nerc.net/standardsreports/standardssummary.aspx>

- NERC PRC-024-2, *Generator Frequency and Voltage Protective Relay Settings*; and
 - PRC-006-3, *Automatic Underfrequency Load Shedding*.
- c) Removal of existing AESO OPP:³
- OPP 804, *Off-Nominal Frequency Load Shedding and Restoration* (“OPP 804”).

The AESO will coordinate the proposed amendments to Section 305.1 with the development of the Alberta version of NERC EOP-011-1 and the Authoritative Documents listed above.

Consultation Completed to Date

Section 305.1 was included in the Capacity Market consultation Set 1 Draft Rules in 2018:

- [Notice of Consultation on ISO rules for the Implementation of the Capacity Market – July 17, 2018](#)
- [Notice of Consultation Session for Set 1 of the ISO Rules for the Implementation of the Capacity Market August 3, 2018](#)
- Set 1 Draft Rules – August 3, 2018
 - Section 305.1, Energy Emergency Alerts [blackline](#) and [clean copy](#)
- [Presentation for the Capacity Market Rules Set 1 Consultation Session – August 15, 2018](#)
- [Invitation for Written Comments on the Set 1 Rules – August 13, 2018](#)
 - [Section 305.1, Energy Emergency Alerts - Stakeholder Comment Matrix](#)
- [Stakeholder Comments on Set 1 of the draft ISO Rules for the Implementation of the Capacity Market - September 7, 2018](#)
- [Set 1 Reply to Stakeholder Feedback – September 21, 2018](#)

Proposed Consultation and Timeline

The AESO proposes the following consultation process for the proposed amendments to Section 305.1:

- Written comments – The AESO is of the opinion that the subject matter is straightforward and will seek written comments on the development of proposed amendments to Section 305.1.

In October 2019, the AESO proposes to seek written comments on the removal of OPP 804; proposed amendments to Section 305.1; and all related proposed new or retirements of existing Alberta reliability standards.

The AESO is targeting Q4 2019 for completion of all consultation and filing of all related developments to Authoritative Documents, as discussed above.

Stakeholder Comments

Stakeholders may submit:

- (i) written comments;
- (ii) a notice of intent to participate in consultation; and
- (iii) comments on the form of consultation.

Please use the *Stakeholder Comment Matrix – Development of Proposed ISO Rule* when submitting comments to the AESO. Stakeholders should ensure that comments provided represent all interests within their organization. The purpose of this notice is to provide Stakeholders with background on the issues to be addressed by the proposed amendments to Section 305.1 and to advise on the proposed

³ <https://www.aeso.ca/rules-standards-and-tariff/iso-rules/>

consultation timeline. The AESO will issue a blackline of the proposed amendments to Section 305.1 for comment on a later date.

The deadline for Stakeholders to provide comments is **August 23, 2019** to rules_comments@aeso.ca. Adherence to deadlines is essential to the integrity of the comment process, and as such, the AESO may choose not to consider any Stakeholder comments received after the deadline.

The AESO will publish all Stakeholder comments received by the deadline on the AESO website on or before August 26, 2019.

Related Materials

1. [Stakeholder Comment Matrix – Development of Proposed Amended Section 305.1](#); and
2. [Copy of existing Section 305.1 of the ISO Rules, Energy Emergency Alerts](#).

Sincerely,

<original signed by>

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Attachments