

February 7, 2017

To: Market Participants and Other Interested Parties

Re: **Letter of Notice – Proposed Removal of Existing Section 305.3 of the ISO rules, *Blackstart Restoration* (“existing Section 305.3”)**

Pursuant to Section 2 of Alberta Utilities Commission (“AUC” or “Commission”) Rule 017, the Alberta Electric System Operator (“AESO”) is providing notice and seeking feedback from market participants and other interested parties on the proposed removal of existing Section 305.3.

## Overview

The AESO is issuing the following two letters concurrently:

- a) this Letter of Notice regarding the removal of existing Section 305.3; and
- b) a Consultation Letter regarding proposed new Alberta Reliability Standard EOP-005-AB-2, *System Restoration from Blackstart Resources* (“new EOP-005-AB-2”).

## Applicability

Existing Section 305.3 is applicable to:

- (a) a legal owner of a transmission facility;
- (b) a legal owner of a generating unit;
- (c) a legal owner of an aggregated generating facility; and
- (d) the AESO.

## Background

Currently, authoritative requirements relating to blackstart restoration are contained within existing Section 305.3. However, given that these requirements relate primarily to system reliability, the AESO has determined that they are properly the subject matter of an Alberta reliability standard. Accordingly, the AESO is proposing to remove existing Section 305.3 on the date that proposed new EOP-005-AB-2 comes into effect. The attached *Transition of Requirements from Section 305.3 into EOP-005-AB-2 and EOP-006-AB-2* matrix identifies the manner in which the requirements of existing Section 305.3 have been transitioned into proposed new EOP-005-AB-2 and existing Alberta Reliability Standard EOP-006-AB-2, *System Restoration Coordination* (“EOP-006-AB-2”).

There are certain differences between the requirements of existing Section 305.3 and the requirements of proposed new EOP-005-AB-2 and existing EOP-006-AB-2, as follows:

- Existing Section 305.3 requires the legal owner of a transmission facility, generating unit or aggregated generating facility to develop and maintain restoration procedures that are in alignment with the AESO’s restoration plan, and to provide these restoration procedures to the AESO on an annual basis. Requirement R5.1 of existing EOP-006-AB-2 requires the AESO to review and approve or disapprove the restoration plan of each operator of a transmission facility. In blackstart conditions, the AESO or its delegate legal owner of a transmission facility will direct the restoration of generating units and aggregated generating facilities and changes to generation or load level, including large motor start, in accordance with the AESO’s or its delegate legal owner of a transmission facility’s restoration plan. Therefore, it is not necessary for the legal

owner of a generating unit or aggregated generating facility that is not a blackstart resource to have its own restoration plan as currently required under existing Section 305.3;

- Existing Section 305.3 requires training of operating personnel, but does not prescribe a time period for this training or specifics on what is required to be included in the training. Requirement R10 of proposed new EOP-005-AB-2 requires each operator of a transmission facility to train its operating personnel annually on the restoration plan. Additionally, Requirement R10 specifies the following to be included in its training:
  - coordination with the AESO and each operator of a generating unit and operator of an aggregated generating facility in accordance with its restoration plan;
  - restoration priorities;
  - building of cranking paths; and
  - synchronizing islands.
- Existing Section 305.3 places requirements regarding blackstart restoration on the legal owners of all generating units and aggregated generating facilities. As described in the first bullet above, the AESO has determined that there is no need for the operator of a generating unit or aggregated generating facility that is not a blackstart resource to develop and train staff on a blackstart restoration plan. In accordance with requirement R18 of proposed new EOP-005-AB-2, the legal owner of a generating unit will be trained on the AESO's restoration plan.

Together, proposed new EOP-005-AB-2 and existing EOP-006-AB-2 set out all the necessary authoritative requirements relating to the restoration of the Alberta interconnected electric system. Accordingly, the AESO is proposing to remove existing Section 305.3.

## Defined Terms

When reviewing the attached existing Section 305.3, market participants should note that all defined terms appear **bolded**. Market participants are encouraged to refer to the AESO's [Consolidated Authoritative Documents Glossary](#) ("CADG") when reviewing existing Section 305.3 to ensure they have an accurate understanding of those defined terms.

## 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 the proposed removal of existing Section 305.3. Market participants should ensure that comments provided represent all interests within their organization.

Market participants are asked to provide comments no later than **March 7, 2017** to [rules\\_comments@aeso.ca](mailto:rules_comments@aeso.ca). Adherence to deadlines is essential to the integrity of the ISO rules comment process. As such, any market participant comments received after March 7, 2017 may not be published, replied to, or otherwise considered by the AESO. The scope of comments is limited to the proposed removal of existing Section 305.3. Any comments received that are outside of this scope will not be considered by the AESO.

The AESO will be publishing all comments received for industry review in March 2017. The AESO expects to publish the replies in May 2017.

If no comments are received by the AESO regarding the proposed removal of existing Section 305.3, the AESO will proceed to file the final proposed removal of existing Section 305.3 with the Commission concurrently with final proposed new EOP-005-AB-2.

In accordance with Section 20.4 of the *Electric Utilities Act*, market participants may object to ISO rules filed with the Commission within 10 days after publication of the Notice of Filing.

## Attachments to Letter of Notice

In accordance with Section 4 of AUC Rule 017, the following documents are attached:

1. [Market Participant Comment Matrix for the proposed removal of existing Section 305.3;](#)
2. [Copy of existing Section 305.3;](#) and
3. [Transition of Requirements from Section 305.3 into EOP-005-AB-2 and EOP-006-AB-2 matrix.](#)

Sincerely,

*"Original Signed By"*

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Attachments