

Date of Request for Comment: <u>February 7, 2017</u> Period of Comment: <u>February 7, 2017</u> through <u>March 7, 2017</u> Comments From: <u>ATCO Electric Ltd.</u> Date [yyyy/mm/dd]: <u>2017/03/07</u>	Contact: <u>Dan Bamber</u> Phone: <u>(780) 509-9152</u> Email: <u>Dan.bamber@atco.com</u>
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Listed below is the summary description of changes for proposed new EOP-005-AB-2. Please refer back to the Consultation Letter under the “Attachments” section to view materials related to proposed new EOP-005-AB-2. Please place your comments/reasons for position underneath (if any).

1. Alberta Reliability Standard	Market Participant Comments and/or Alternative Proposal
<p>New</p> <p>The AESO is seeking comments from market participants with regard to the following matters:</p> <ol style="list-style-type: none"> Are there any requirements contained in proposed new EOP-005-AB-2 that are not clearly articulated? If yes, please indicate the specific section of proposed new EOP-005-AB-2, describe the concern and suggest alternative language. Please provide any additional comments regarding the proposed new EOP-005-AB-2. 	<p>ATCO Electric has the following questions pertaining to the Proposed EOP-005 ARS:</p> <ol style="list-style-type: none"> R1 – (a)- One or more areas of the interconnected electric system shuts down; AE Concern: <i>How does the ISO define areas?</i> R1.5 The identification of the initial switching requirements for any facilities, operated by the operator of a transmission facility, that are a part of the cranking paths identified in the ISO’s restoration plan AE Concern: <i>What do you mean by initial switching requirements?</i> R1.7 Operating processes to reestablish connections between the transmission facilities of the operator of a transmission facility for areas that have been restored and are prepared for reconnection. <p style="text-align: center;">Vs</p> <p>R1.3 Procedures for restoring: (a) connections with other operators of transmission facilities; and (b) interconnections with any adjacent interconnected transmission operators under the direction of the ISO.</p>

	<p>AE Concern: Can the AESO please explain what the difference between R1.7 and R1.3 is currently as written, other than one is a procedure and one is a process? The NERC version of EOP-005 R1.7 speaks in R1.7 about processes to reestablish connections within the operator of transmission facility area. This distinction should be reflected in the AB version.</p> <p>4- R2 In the event of changes to the roles and specific tasks of entities identified in a restoration plan: AE Concern: What do you mean by roles and specific tasks whereas there is no mention of roles and tasks in the existing plan as required by R1?</p> <p>5- R3 Each operator of a transmission facility must within sixty (60) days after receiving an updated copy of the ISO's restoration plan: AE Concern: AE may require greater than 60 days if there is a new blackstart resource added. Will the 60 day time line be flexible in that scenario?</p> <p>6- R3.1 AE Concern: What is the ISO's time frame to respond back to the operator of a transmission facility after they have resolved the issues identified by the ISO?</p> <p>7- R4.1 AE Concern: What is the ISO's time frame to respond back to the operator of a transmission facility after they have resolved the issues identified by the ISO?</p> <p>8- R12 Each operator of a transmission facility must participate in the ISO's restoration drills, exercises, or simulations if requested by the ISO. AE Concern: How will the AESO be officially communicating this request to Market Participants?</p>