

June 22, 2017

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

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

The Alberta Electric System Operator (“AESO”) is filing the final proposed removal of existing Section 305.3 with the Commission pursuant to Section 20.2(1) of the *Electric Utilities Act* (“EUA”) and sections 11 through 13 of AUC Rule 017. The AESO is authorized to make ISO rules in accordance with sections 19 and 20 of the EUA.

Overview

The AESO is filing the following concurrently with the Commission:

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

The purpose of filing these applications concurrently is described in the Background section below.

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 final 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 final 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 final proposed new EOP-005-AB-2 and existing EOP-006-AB-2, described 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, however, the legal owner of a generating unit or aggregated generating facility that is not a blackstart resource is not required to have its own restoration plan. 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
- 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 final proposed new EOP-005-AB-2 requires each operator of a transmission facility to train its operating personnel annually on its restoration plan, and 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 its own blackstart restoration plan. In accordance with requirement R18 of final proposed new EOP-005-AB-2, the legal owner of a generating unit will be trained on the AESO's restoration plan.

Together, final 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.

Summary of AESO Consultation

On February 7, 2017, the AESO posted a [Letter of Notice](#) on its website requesting written comments from market participants and other interested parties with respect to the proposed removal of existing Section 305.3, and notified market participants in the AESO Stakeholder Newsletter.

No comments were received from market participants and other interested parties with respect to the proposed removal of existing Section 305.3.

Attachments to Notice of Filing

In accordance with Section 13 of AUC Rule 017, the following documents are attached to this Notice of Filing:

1. February 7, 2017 Letter of Notice;
2. [Copy of existing Section 305.3](#);
3. [Transition of Requirements from Section 305.3 into EOP-005-AB-2 and EOP-006-AB-2 matrix](#);
4. [Clean copy of final proposed new EOP-005-AB-2](#); and
5. [Copy of existing EOP-006-AB-2](#).

Proposed Effective Date

In accordance with Section 20.3 of the EUA, if no objection is filed, the removal of existing Section 305.3 will become effective in conjunction with the final proposed new EOP-005-AB-2.

The AESO submits that the removal of existing Section 305.3 complies with AUC Rule 017 and further submits that the removal of existing Section 305.3 is not technically deficient, supports the fair, efficient and openly competitive operation of the market, and is in the public interest.

If you have any questions, please contact the undersigned.

Sincerely,

"Original Signed By"

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Attachments