

Stakeholder Comment Matrix – January 31, 2019



Proposed Amendments to Previously Approved PRC-005-AB-6, *Protection System, Automatic Reclosing and Sudden Pressure Relaying Maintenance* (“ PRC-005-AB-6”), and rename as PRC-005-AB1-6, *Protection System, Automatic Reclosing and Sudden Pressure Relaying Maintenance* (“amended PRC-005-AB1-6”)

Date of Request for Comment: February 14, 2019
Period of Comment: January 31, 2019 through February 15, 2019
Comments From: ATCO Electric Ltd.
Date [yyyy/mm/dd]: 2019/02/14

Contact: Dan Bamber
Phone: 780 918-0986
Email: Dan.bamber@atco.com

Listed below is the summary description of changes for the proposed amended PRC-005-AB1-6 Please refer back to the Consultation Letter under the “Attachments” section to view materials related to the proposed amended PRC-005-AB1-6. Please place your comments/reasons for position underneath (if any).

Alberta Reliability Standard	Stakeholder Comments and/or Alternative Proposal
<p>Amended</p> <p>The AESO is seeking comments from stakeholders with regard to the following matters:</p> <ol style="list-style-type: none"> 1. Are there any requirements contained in proposed amended PRC-005-AB1-6 that are not clearly articulated? If yes, please indicate the specific section of proposed amended PRC-005-AB1-6, describe the concern and suggest alternative language. 2. Please provide any additional comments regarding proposed amended PRC-005-AB1-6. 	<p>Comment # 1: <i>The bulk electric system definition that the standard refers to is not clear about the system elements that are in scope.</i></p> <p>https://www.aeso.ca/assets/Uploads/Consolidated-Authoritative-Document-Glossary-January-1-2019-.pdf</p> <p><i>The definition talks about generating sources, transmission lines, etc but does not specifically state other elements such as transformers, buses, breakers, reactors, capacitor banks, static var compensators, synchronous condensers, and filter banks. In addition, the voltage level and configuration of these elements are also not described, which are vital in defining a BES element, similar to NERC’s definitions.</i></p> <p>https://www.nerc.com/pa/RAPA/BES%20DL/bes_phase2_reference_document_20140325_final_clean.pdf</p> <p><i>Local Networks are not mentioned in the CADG’s bulk electric system definition, yet it was referenced to in AESO Replies to Market Participant Comments: 2018-07-05, Page 11 of 21, Reply #21.</i></p> <p>https://www.aeso.ca/assets/Uploads/Market-Participant-Comment-and-AESO-Reply-Matrix-PRC-005-AB-6.pdf</p> <p><i>Responding to AESO’s Reply #21, we believe AESO has decided to exceed NERC BES Definitions by including Local Networks because it believes a) reliability of Local Network is important and b) if protection systems in Local Network is not maintained per PRC-005, the disturbances in Local Network will back up into system network to impact BES Reliability. We agree that reliability of Local Network is important, however, a protection system issue in Local Network will not back up into the system (backbone grid). For example, in the event of protection system failure in Local Network, say a line fault misoperation or a non-operation would only back up to one of the Interconnecting Tie Transformer and not back up into the system network. Therefore, a disturbance in Local Network is always localized when designed adequately (i.e. as per ISO rule 502.3). If AESO believes a disturbance in Local Network can back up or impact backbone grid, then we need to address the root cause of protection design or ISO rule 502.3 rather than impose PRC-005 on it. NERC accordingly does not impose PRC-005 on Local Networks. What we are trying to establish is that only customers served by the radial line will be affected, and not the BES. If necessary, we can have a meeting with protection engineers on AESO’s team and discuss this further.</i></p>

