

May 26, 2022

To: Market Participants and Other Interested Parties (“Stakeholders”)

Re: **Stakeholder Comments on Consultation Letter on the proposed new reliability standards and retirement of existing reliability standards:**

- 1) **Proposed new EOP-005-AB-3, System Restoration from Blackstart Resources (“new EOP-005-AB-3”);**
- 2) **Proposed new EOP-006-AB-3, System Restoration Coordination (“new EOP-005-AB-3”);**
- 3) **Proposed retirement of existing EOP-005-AB-2, System Restoration from Blackstart Resources (“existing EOP-005-AB-2”); and**
- 4) **Proposed retirement of existing EOP-006-AB-2, System Restoration Coordination (“existing EOP-006-AB-2”),**

collectively referred to as the “proposed new reliability standards and retirement of existing reliability standards”.

The Alberta Electric System Operator (“AESO”) received comments from Stakeholders in response to its May 3, 2022 *Consultation Letter on the proposed new reliability standards and retirement of existing reliability standards*. These comments have been posted on the AESO website.

Comments were received from the following Stakeholders:

1. AltaLink;
2. ENMAX Energy Corporation; and
3. ENMAX Power Corporation.

Thank you to all Stakeholders who participated in this consultation. All written comments received will be considered in the AESO’s finalization of the proposed new reliability standards and retirement of existing reliability standards.

If you have any questions, please submit them to ars_comments@aes0.ca.

Sincerely,

Jackie Gow

Legal Manager, ISO Rules and Alberta Reliability Standards
Legal and Regulatory Affairs
ars_comments@aes0.ca

Stakeholder Comment Matrix – Proposed New Reliability Standards and Retirement of Existing Reliability Standards:

- 1) Proposed new EOP-005-AB-3, *System Restoration from Blackstart Resources* (“new EOP-005-AB-3”);
- 2) Proposed new EOP-006-AB-3, *System Restoration Coordination* (“new EOP-006-AB-3”);
- 3) Proposed retirement of existing EOP-005-AB-2, *System Restoration from Blackstart Resources* (“existing EOP-005-AB-2”); and
- 4) Proposed retirement of existing EOP-006-AB-2, *System Restoration Coordination* (“existing EOP-006-AB-2”).



Date of Request for Comment: <u>May 3, 2022</u>	Contact: <u>Jenette Yearsley</u>
Period of Comment: <u>May 3, 2022</u> through <u>May 25, 2022</u>	Phone: <u>(403) 703-3201</u>
Comments From: <u>AltaLink</u>	Email: <u>Jenette.Yearsley@AltaLink.ca</u>
Date: <u>May 25, 2022</u>	

Instructions:

1. Please fill out the section above as indicated.
2. Please refer back to the Consultation Letter under the “Related Materials to Consultation Letter” section to view materials related to the proposed new reliability standards and retirement of existing reliability standards.
3. Please respond to the questions below and provide your specific comments, proposed revisions, and reasons for your position underneath (if any). Blank boxes will be interpreted as favourable comments.
4. Please be advised that general comments do not give the AESO any specific issue to consider and address, and results in a general response.

Alberta Reliability Standard – Proposed new EOP-005-AB-3	Stakeholder Comments and/or Alternative Proposal
1. Are there any requirements contained in the proposed new EOP-005-AB-3 that are not clearly articulated? If yes, please indicate the specific section of the proposed new EOP-005-AB-3, describe the concern and suggest alternative language.	EOP-005 R5.1: Each operator of a transmission facility must provide a copy of its latest ISO approved restoration plan, prior to its effective date, to each operator of an electric distribution system identified in that plan. AltaLink requires additional clarification regarding the effective date of the approved restoration plan. Typically, a transmission facility owner (TFO) must align its restoration plan with the AESO’s restoration plan. AltaLink noticed that the AESO’s restoration plan does not specify an effective date and it is typically issued after system modifications are completed.
2. Do you have any additional comments regarding the proposed new EOP-005-AB-3? If yes, please specify.	EOP-005 R4: Each operator of a transmission facility must update and submit its revised restoration plan to the ISO for approval, when the

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- 2) Proposed new EOP-006-AB-3, *System Restoration Coordination* (“new EOP-006-AB-3”);
- 3) Proposed retirement of existing EOP-005-AB-2, *System Restoration from Blackstart Resources* (“existing EOP-005-AB-2”); and
- 4) Proposed retirement of existing EOP-006-AB-2, *System Restoration Coordination* (“existing EOP-006-AB-2”).



Alberta Reliability Standard – Proposed new EOP-005-AB-3	Stakeholder Comments and/or Alternative Proposal
	<p>revision would change its ability to implement its restoration plan, as follows:</p> <p>(b) not less than thirty (30) days prior to implementing a planned permanent interconnected electric system modification.</p> <p>It is AltaLink’s point of view that R4(b) is redundant with R3 for planned permanent interconnected electric system (IES) modifications due to projects directed by the AESO. Projects with an AESO functional specification would be already known to the AESO and captured in requirement R3 through existing ISO Rule 502.15. For R4(b), AltaLink recommends excepting planned permanent IES modifications due to projects directed by the AESO through the functional specification.</p>
<p>3. Please provide any comments or views on the need for amendments to the existing information document, ID #2018-003RS, <i>System Restoration from Blackstart Resources</i>, aside from updates to the EOP-005-AB version reference. If applicable, please provide the type of content that should be included.</p>	<p>None.</p>
<p>4. Do you prefer the AESO’s proposed implementation timeline of 1 full calendar quarter after AUC approval or NERC’s timeline, i.e., 4 full calendar quarters after AUC approval? Please include your rationale.</p>	<p>AltaLink prefers implementation to be 4 full calendar quarters after AUC approval as the new standard would require updates to the software used for logging and reporting to collect evidence.</p>

Alberta Reliability Standard – Proposed new EOP-006-AB-3	Stakeholder Comments and/or Alternative Proposal
<p>1. Are there any requirements contained in the proposed new EOP-006-AB-3 that are not clearly articulated? If</p>	<p>None.</p>

Stakeholder Comment Matrix – Proposed New Reliability Standards and Retirement of Existing Reliability Standards:

- 1) Proposed new EOP-005-AB-3, *System Restoration from Blackstart Resources* (“new EOP-005-AB-3”);
- 2) Proposed new EOP-006-AB-3, *System Restoration Coordination* (“new EOP-006-AB-3”);
- 3) Proposed retirement of existing EOP-005-AB-2, *System Restoration from Blackstart Resources* (“existing EOP-005-AB-2”); and
- 4) Proposed retirement of existing EOP-006-AB-2, *System Restoration Coordination* (“existing EOP-006-AB-2”).



yes, please indicate the specific section of the proposed new EOP-006-AB-3, describe the concern and suggest alternative language.	
2. Do you have any additional comments regarding the proposed new EOP-006-AB-3? If yes, please specify.	None.
3. Please provide any comments or views on the need for the development of a related information document, including the type of content that should be included.	None.
4. Do you prefer the AESO’s proposed implementation timeline of 1 full calendar quarter after AUC approval or NERC’s timeline, i.e., 4 full calendar quarters after AUC approval? Please include your rationale.	None.

Alberta Reliability Standard – Existing EOP-005-AB-2	Stakeholder Comments and/or Alternative Proposal
1. Do you have any concerns with the proposed retirement of the existing EOP-005-AB-2? If yes, please specify.	None.

Alberta Reliability Standard –Existing EOP-006-AB-2	Stakeholder Comments and/or Alternative Proposal
1. Do you have any concerns with the proposed retirement of the existing EOP-006-AB-2? If yes, please specify.	None.

Stakeholder Comment Matrix – Proposed New Reliability Standards and Retirement of Existing Reliability Standards:

- 1) Proposed new EOP-005-AB-3, *System Restoration from Blackstart Resources* (“new EOP-005-AB-3”);
- 2) Proposed new EOP-006-AB-3, *System Restoration Coordination* (“new EOP-006-AB-3”);
- 3) Proposed retirement of existing EOP-005-AB-2, *System Restoration from Blackstart Resources* (“existing EOP-005-AB-2”); and
- 4) Proposed retirement of existing EOP-006-AB-2, *System Restoration Coordination* (“existing EOP-006-AB-2”).



Date of Request for Comment: <u>May 3, 2022</u>	Contact: <u>Mark McGillivray</u>
Period of Comment: <u>May 3, 2022</u> through <u>May 25, 2022</u>	Phone: _____
Comments From: <u>ENMAX Energy Corporation</u>	Email: <u>MMcGillivray@enmax.com</u>
Date: <u>2022/5/19</u>	

Instructions:

1. Please fill out the section above as indicated.
2. Please refer back to the Consultation Letter under the “Related Materials to Consultation Letter” section to view materials related to the proposed new reliability standards and retirement of existing reliability standards.
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Alberta Reliability Standard – Proposed new EOP-005-AB-3	Stakeholder Comments and/or Alternative Proposal
1. Are there any requirements contained in the proposed new EOP-005-AB-3 that are not clearly articulated? If yes, please indicate the specific section of the proposed new EOP-005-AB-3, describe the concern and suggest alternative language.	No comment.
2. Do you have any additional comments regarding the proposed new EOP-005-AB-3? If yes, please specify.	No comment.
3. Please provide any comments or views on the need for amendments to the existing information document, ID #2018-003RS, <i>System Restoration from Blackstart</i>	No comment.

Stakeholder Comment Matrix – Proposed New Reliability Standards and Retirement of Existing Reliability Standards:

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- 2) Proposed new EOP-006-AB-3, *System Restoration Coordination* (“new EOP-006-AB-3”);
- 3) Proposed retirement of existing EOP-005-AB-2, *System Restoration from Blackstart Resources* (“existing EOP-005-AB-2”); and
- 4) Proposed retirement of existing EOP-006-AB-2, *System Restoration Coordination* (“existing EOP-006-AB-2”).



Alberta Reliability Standard – Proposed new EOP-005-AB-3	Stakeholder Comments and/or Alternative Proposal
<p><i>Resources</i>, aside from updates to the EOP-005-AB version reference. If applicable, please provide the type of content that should be included.</p>	
<p>4. Do you prefer the AESO’s proposed implementation timeline of 1 full calendar quarter after AUC approval or NERC’s timeline, i.e., 4 full calendar quarters after AUC approval? Please include your rationale.</p>	<p>ENMAX Energy Corporation supports the AESO’s proposed implementation timeline of 1 full calendar quarter after AUC approval.</p>

Alberta Reliability Standard – Proposed new EOP-006-AB-3	Stakeholder Comments and/or Alternative Proposal
<p>1. Are there any requirements contained in the proposed new EOP-006-AB-3 that are not clearly articulated? If yes, please indicate the specific section of the proposed new EOP-006-AB-3, describe the concern and suggest alternative language.</p>	<p>No comment.</p>
<p>2. Do you have any additional comments regarding the proposed new EOP-006-AB-3? If yes, please specify.</p>	<p>No comment.</p>
<p>3. Please provide any comments or views on the need for the development of a related information document, including the type of content that should be included.</p>	<p>No comment.</p>
<p>4. Do you prefer the AESO’s proposed implementation timeline of 1 full calendar quarter after AUC approval or NERC’s timeline, i.e., 4 full calendar quarters after AUC approval? Please include your rationale.</p>	<p>No comment.</p>

Stakeholder Comment Matrix – Proposed New Reliability Standards and Retirement of Existing Reliability Standards:

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- 3) Proposed retirement of existing EOP-005-AB-2, *System Restoration from Blackstart Resources* (“existing EOP-005-AB-2”); and
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Alberta Reliability Standard – Existing EOP-005-AB-2	Stakeholder Comments and/or Alternative Proposal
1. Do you have any concerns with the proposed retirement of the existing EOP-005-AB-2? If yes, please specify.	No comment.
Alberta Reliability Standard –Existing EOP-006-AB-2	Stakeholder Comments and/or Alternative Proposal
1. Do you have any concerns with the proposed retirement of the existing EOP-006-AB-2? If yes, please specify.	No comment.

Stakeholder Comment Matrix – Proposed New Reliability Standards and Retirement of Existing Reliability Standards:

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- 3) Proposed retirement of existing EOP-005-AB-2, *System Restoration from Blackstart Resources* (“existing EOP-005-AB-2”); and
- 4) Proposed retirement of existing EOP-006-AB-2, *System Restoration Coordination* (“existing EOP-006-AB-2”).



Date of Request for Comment: <u>May 3, 2022</u>	Contact: <u>Robert Rothstein</u>
Period of Comment: <u>May 3, 2022</u> through <u>May 25, 2022</u>	Phone: <u>403-689-6507</u>
Comments From: <u>ENMAX Power Corporation</u>	Email: <u>rrothstein@enmax.com</u>
Date: <u>[2022/05/20]</u>	

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<p>1. Are there any requirements contained in the proposed new EOP-005-AB-3 that are not clearly articulated? If yes, please indicate the specific section of the proposed new EOP-005-AB-3, describe the concern and suggest alternative language.</p>	<p>Insert Comments / Reason for Position (if any)</p> <p>R5 states that each operator of a transmission facility must have a copy of its current latest ISO-approved restoration plan within its primary and backup control rooms prior to its effective date.</p> <p>Storing plans prior to their effective dates can be problematic for the reason that if the plan contains content that affects its implementation, distribution is delayed until copies have been placed at both the primary and alternate Control Centre.</p> <p>An alternative is to allow plans to be placed at both the primary and alternate Control Centre on or before the effective date.</p>

Stakeholder Comment Matrix – Proposed New Reliability Standards and Retirement of Existing Reliability Standards:

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- 2) Proposed new EOP-006-AB-3, *System Restoration Coordination* (“new EOP-006-AB-3”);
- 3) Proposed retirement of existing EOP-005-AB-2, *System Restoration from Blackstart Resources* (“existing EOP-005-AB-2”); and
- 4) Proposed retirement of existing EOP-006-AB-2, *System Restoration Coordination* (“existing EOP-006-AB-2”).



Alberta Reliability Standard – Proposed new EOP-005-AB-3	Stakeholder Comments and/or Alternative Proposal
	<p>Is the expectation that effective dates include hours, minutes and seconds to ensure storage and effective dates can be sorted chronologically?</p> <p>R8 includes an additional requirement for TFO restoration training:</p> <p style="padding-left: 40px;">e) transition of demand and resource balance to the ISO, as applicable.</p> <p>Does ‘as applicable’ indicate that R8 e) is required in training although the scenario might not occur or does ‘as applicable’ indicate that if the transition of demand and resource balance to the ISO is not relevant to the TFO’s restoration plan, e) is not required in their restoration training?</p>
2. Do you have any additional comments regarding the proposed new EOP-005-AB-3? If yes, please specify.	No comment
3. Please provide any comments or views on the need for amendments to the existing information document, ID #2018-003RS, <i>System Restoration from Blackstart Resources</i> , aside from updates to the EOP-005-AB version reference. If applicable, please provide the type of content that should be included.	No comment
4. Do you prefer the AESO’s proposed implementation timeline of 1 full calendar quarter after AUC approval or NERC’s timeline, i.e., 4 full calendar quarters after AUC approval? Please include your rationale.	Four full calendar quarters provides enough time to implement changes and ensure real-time operating personnel complete the appropriate training.

Alberta Reliability Standard – Proposed new EOP-006-AB-3	Stakeholder Comments and/or Alternative Proposal
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Stakeholder Comment Matrix – Proposed New Reliability Standards and Retirement of Existing Reliability Standards:

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- 2) Proposed new EOP-006-AB-3, *System Restoration Coordination* (“new EOP-006-AB-3”);
- 3) Proposed retirement of existing EOP-005-AB-2, *System Restoration from Blackstart Resources* (“existing EOP-005-AB-2”); and
- 4) Proposed retirement of existing EOP-006-AB-2, *System Restoration Coordination* (“existing EOP-006-AB-2”).



1. Are there any requirements contained in the proposed new EOP-006-AB-3 that are not clearly articulated? If yes, please indicate the specific section of the proposed new EOP-006-AB-3, describe the concern and suggest alternative language.	No comment
2. Do you have any additional comments regarding the proposed new EOP-006-AB-3? If yes, please specify.	No comment
3. Please provide any comments or views on the need for the development of a related information document, including the type of content that should be included.	No comment
4. Do you prefer the AESO’s proposed implementation timeline of 1 full calendar quarter after AUC approval or NERC’s timeline, i.e., 4 full calendar quarters after AUC approval? Please include your rationale.	No comment

Alberta Reliability Standard – Existing EOP-005-AB-2	Stakeholder Comments and/or Alternative Proposal
1. Do you have any concerns with the proposed retirement of the existing EOP-005-AB-2? If yes, please specify.	No comment

Alberta Reliability Standard –Existing EOP-006-AB-2	Stakeholder Comments and/or Alternative Proposal
1. Do you have any concerns with the proposed retirement of the existing EOP-006-AB-2? If yes, please specify.	No comment