

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:	May 3, 2022		
Period of Consultation:	May 3, 2022	through	May 25, 2022

The AESO is seeking comments from Stakeholders with regard to the following matters:

Alberta Reliability Standard – Proposed new EOP-005-AB-3	Stakeholder Comments and/or Alternative Proposal	AESO Replies
<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>AltaLink</p> <p>1. 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.</p> <p>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.</p>	<p>1. The AESO will specify an effective date on updated copies of its restoration plan starting with the next annual update to its restoration plan. Please note that an operator of a transmission facility is required to update its restoration plan as set out in EOP-005-AB, whereas the AESO’s restoration plan is updated in accordance with the requirements set out in EOP-006-AB. For planned permanent system modifications that impact the major cranking paths identified in the AESO’s restoration plan, it is the AESO’s practice to issue the restoration plan prior to the energization of the system modifications. For all other system modifications that occur throughout the year which do not have a significant impact on the implementation of the AESO’s restoration plan, the AESO typically updates its system restoration</p>

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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”).



Alberta Reliability Standard – Proposed new EOP-005-AB-3	Stakeholder Comments and/or Alternative Proposal	AESO Replies
	<p><u>ENMAX Energy Corporation</u></p> <p>2. No comment.</p> <p><u>ENMAX Power Corporation</u></p> <p>3. 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> <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>plan to account for these modifications as part of its the annual update cycle.</p> <p>2. The AESO acknowledges ENMAX Energy Corporation’s comment.</p> <p>3. Regarding Requirement R5 of EOP-005-AB-3, the AESO is of the view that the language should be left as drafted in proposed new EOP-005-AB-3, dated on May 3, 2022. By stating that its restoration plan must be place in the control rooms prior to the effective date, it ensures that its restoration plan is available when it takes effect and aligns with the NERC EOP-005-3.</p> <p>There is no requirement to include the hour, minute and second in the effective date. The AESO also notes that EOP-005-AB-3 does not require an operator of a transmission facility to store its past restoration plans, that are no longer in effect, within its primary and backup control rooms. However, evidence of compliance with requirement R5 must be retained. Evidence for requirement R5 includes having a copy of its AESO-approved restoration plan within the primary and backup control rooms prior</p>

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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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	<p>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>	<p>to the effective date of the restoration plan.</p> <p>Regarding requirement R8(e) of EOP-005-AB-3, for greater clarity, the AESO has removed the language “as applicable” from the requirement as all operators of transmission facilities to which EOP-005-AB-3 applies will be required to include training on transition of demand and resource balance to the AESO within their operations training program.</p>
<p>2. Do you have any additional comments regarding the proposed new EOP-005-AB-3? If yes, please specify.</p>	<p><u>AltaLink</u></p> <p>4. EOP-005 R4: Each operator of a transmission facility must update and submit its revised restoration plan to the ISO for approval, when the 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</p>	<p>4. The AESO is of the view that requirement R4(b) of EOP-005-AB-3 is not redundant with R3 of EOP-005-AB-3. Each operator of a transmission facility must update its restoration plan as required under requirements R4(b) and R3 of EOP-005-AB-3.</p> <p>Requirement R3 requires that an operator of a transmission facility update its restoration plan within a specified period of time after receiving a to the AESO’s restoration plan, which is updated annually in accordance with requirement R3 of EOP-006-AB-3.</p>

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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”).



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	<p>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><u>ENMAX Energy Corporation</u></p> <p>5. No comment.</p> <p><u>ENMAX Power Corporation</u></p> <p>6. No comment</p>	<p>This differs from requirement R4(b) of EOP-005-AB-3, which requires each operator of a transmission facility to update its restoration plan within a specified period of time prior to implementing a planned permanent interconnected electric system modification.</p> <p>The AESO is proposing to add the following, shown as underlined text, to requirement R3 of EOP-005-AB-3 to improve clarity:</p> <p><i>Each operator of a transmission facility must within sixty (60) days, or another time period agreed to by the ISO, after receiving a copy of the ISO’s restoration plan updated in accordance with requirement R3 of EOP-006-AB-3 or any subsequent version of that reliability standard.</i></p> <p>5. The AESO acknowledges ENMAX Energy Corporation’s comment.</p> <p>6. The AESO acknowledges ENMAX Energy Corporation’s comment.</p>

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Alberta Reliability Standard – Proposed new EOP-005-AB-3	Stakeholder Comments and/or Alternative Proposal	AESO Replies
<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><u>AltaLink</u></p> <p>7. None.</p> <p><u>ENMAX Energy Corporation</u></p> <p>8. No comment.</p> <p><u>ENMAX Power Corporation</u></p> <p>9. No comment</p>	<p>7. The AESO acknowledges AltaLink’s comment.</p> <p>8. The AESO acknowledges ENMAX Energy Corporation’s comment.</p> <p>9. The AESO acknowledges ENMAX Power Corporation’s 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><u>AltaLink</u></p> <p>10. 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> <p><u>ENMAX Energy Corporation</u></p> <p>11. ENMAX Energy Corporation supports the AESO’s proposed implementation timeline of 1 full calendar quarter after AUC approval.</p> <p><u>ENMAX Power Corporation</u></p> <p>12. Four full calendar quarters provides enough time to implement changes and</p>	<p>10. The AESO appreciates the feedback received regarding the implementation timeline. The AESO will propose the effective date for EOP-005-AB-3 to be 4 full calendar quarters after approval by the Commission as the majority of responses received indicate a preference that the AESO align with NERC’s implementation timeline.</p> <p>11. Please see the AESO’s reply to comment #10.</p> <p>12. Please see the AESO’s reply to comment #10.</p>

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Alberta Reliability Standard – Proposed new EOP-005-AB-3	Stakeholder Comments and/or Alternative Proposal	AESO Replies
	ensure real-time operating personnel complete the appropriate training.	

Alberta Reliability Standard – Proposed new EOP-006-AB-3	Stakeholder Comments and/or Alternative Proposal	AESO Replies
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><u>AltaLink</u></p> <p>1. None.</p> <p><u>ENMAX Energy Corporation</u></p> <p>2. No comment.</p> <p><u>ENMAX Power Corporation</u></p> <p>3. No comment</p>	<p>1. The AESO acknowledges AltaLink’s comment.</p> <p>2. The AESO acknowledges ENMAX Energy Corporation’s comment.</p> <p>3. The AESO acknowledges ENMAX Power Corporation’s comment.</p>
2. Do you have any additional comments regarding the proposed new EOP-006-AB-3? If yes, please specify.	<p><u>AltaLink</u></p> <p>4. None.</p> <p><u>ENMAX Energy Corporation</u></p> <p>5. No comment.</p> <p><u>ENMAX Power Corporation</u></p> <p>6. No comment</p>	<p>4. The AESO acknowledges AltaLink’s comment.</p> <p>5. The AESO acknowledges ENMAX Energy Corporation’s comment.</p> <p>6. The AESO acknowledges ENMAX Power Corporation’s comment.</p>
3. Please provide any comments or views on the need for the development of a related information document, including the	<p><u>AltaLink</u></p> <p>7. None.</p>	<p>7. The AESO acknowledges AltaLink’s comment.</p>

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type of content that should be included.	<p><u>ENMAX Energy Corporation</u></p> <p>8. No comment.</p> <p><u>ENMAX Power Corporation</u></p> <p>9. No comment</p>	<p>8. The AESO acknowledges ENMAX Energy Corporation’s comment.</p> <p>9. The AESO acknowledges ENMAX Power Corporation’s comment.</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><u>AltaLink</u></p> <p>10. None.</p> <p><u>ENMAX Energy Corporation</u></p> <p>11. No comment.</p> <p><u>ENMAX Power Corporation</u></p> <p>12. No comment</p>	<p>10. The AESO acknowledges AltaLink’s comment.</p> <p>11. The AESO acknowledges ENMAX Energy Corporation’s comment.</p> <p>12. The AESO acknowledges ENMAX Power Corporation’s comment.</p>

Alberta Reliability Standard – Existing EOP-005-AB-2	Stakeholder Comments and/or Alternative Proposal	AESO Replies
1. Do you have any concerns with the proposed retirement of the existing EOP-005-AB-2? If yes, please specify.	<p><u>AltaLink</u></p> <p>1. None.</p> <p><u>ENMAX Energy Corporation</u></p> <p>2. No comment.</p> <p><u>ENMAX Power Corporation</u></p> <p>3. No comment</p>	<p>1. The AESO acknowledges AltaLink’s comment.</p> <p>2. The AESO acknowledges ENMAX Energy Corporation’s comment.</p> <p>3. The AESO acknowledges ENMAX Power Corporation’s comment.</p>

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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”).



Alberta Reliability Standard – Existing EOP-006-AB-2	Stakeholder Comments and/or Alternative Proposal	AESO Replies
<p>1. Do you have any concerns with the proposed retirement of the existing EOP-006-AB-2? If yes, please specify.</p>	<p><u>AltaLink</u></p> <p>1. None.</p> <p><u>ENMAX Energy Corporation</u></p> <p>2. No comment.</p> <p><u>ENMAX Power Corporation</u></p> <p>3. No comment</p>	<p>1. The AESO acknowledges AltaLink’s comment.</p> <p>2. The AESO acknowledges ENMAX Energy Corporation’s comment.</p> <p>3. The AESO acknowledges ENMAX Power Corporation’s comment.</p>