

October 23, 2020

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

Re: Forwarding Notice – Revision to the Effective Date of the Reliability Standard Definition of “bulk electric system”

The Alberta Electric System Operator (“AESO”) recommends that the Commission approve a proposed revised effective date, as set out below, for the recently approved reliability standard definition of “bulk electric system”, pursuant to Section 19 of the *Transmission Regulation*.

Specifically, the AESO recommends that the effective date for the recently approved reliability standard definition of “bulk electric system” be revised as follows:

- (a) to August 6, 2020 for facilities that were considered part of the “bulk electric system” under the definition that was in effect prior to August 6, 2020 (the “previously approved definition”) and will continue to be part of the bulk electric system under the definition that was approved on August 6, 2020 (the “recently approved amended definition”), including any new facilities that would have been considered part of the “bulk electric system” under the previously approved definition; and
- (b) to August 6, 2022 for facilities that were not considered part of the “bulk electric system” under the previously approved definition of “bulk electric system”, including any new facilities that would not have been considered part of the “bulk electric system” under the previously approved definition.

Additionally, the AESO requests that the previously approved definition of “bulk electric system”, in effect prior to August 6, 2020, continue to apply to those facilities described in (b) above until August 6, 2022.

Background

AESO Consultation on the reliability standard definition of “bulk electric system”

On July 23, 2019, the AESO issued the *Consultation Letter for Proposed New and Amended Alberta Reliability Standards Definitions*. In that letter to Stakeholders, the AESO outlined its proposed effective dates, which included the following:

The AESO is proposing the following effective dates for the proposed amended “bulk electric system” definition

- *October 1, 2019, for facilities that are currently considered part of the bulk electric system under the existing definition and will continue to be part of the bulk electric system under the proposed amended definition; and*
- *October 1, 2021, for facilities that are not currently considered part of the bulk electric system under the existing definition but will be part of the bulk electric system under the proposed amended definition.*

On July 3, 2020, the AESO forwarded its proposed new and amended bulk electric system, system access service, and radial circuit (“ARS-related”) definitions to the AUC. In the July 3, 2020 forwarding letter, the AESO recommended that the AUC approve the final proposed new and amended ARS-related definitions to become effective upon approval by the Commission.

In alignment with its consultation, it was the AESO's intention to recommend an effective date for the "bulk electric system" definition of two years following the approval of the ARS-related definitions for those facilities not considered part of the bulk electric system under the previously approved definition but that would be part of the bulk electric system under the recently approved amended definition.

On August 6, 2020, the AUC approved the proposed new and amended ARS-related definitions with an effective date of August 6, 2020 for all facilities.

October 2020 Stakeholder Notification

On October 2, 2020, the AESO posted the *Notice of Intention to Request a Revision to the Effective Date of the Recently Approved Bulk Electric System Definition* ("Notification Letter") on its website notifying market participants and other interested parties that it would be requesting a revision to the effective date of the recently approved amended definition for the bulk electric system to address the oversight from its July 3, 2020 forwarding letter. A notice of the Notification Letter posting was included in the AESO's Stakeholder Newsletter on October 6, 2020.

In the Notification Letter, the AESO stated that it would be forwarding its request to the AUC on or after October 16, 2020.

Previously Approved Bulk Electric System Definition in Effect Prior to August 6, 2020

For reference, the definition of "bulk electric system" in effect prior to August 6, 2020 means:

"as defined by the Regional Reliability Organization, means the electrical generation resources, transmission lines, interconnections, with neighbouring systems, and associated equipment, generally operated at voltages of one hundred (100) kV or higher; radial transmission facilities serving only load with one (1) transmission source are generally not included in this definition."

Recently Approved Amended Bulk Electric System Definition

The recently approved amended definition of "bulk electric system" means:

"all system elements that are included in the following:

- (i) all system elements that have all terminals energized at 100 kV or higher that are not part of a radial circuit;
- (ii) a radial circuit comprised of system elements that have all terminals energized at 100 kV or higher where the radial circuit connects to:
 - (a) any facility included in items (iv) through (vii) below; or
 - (b) 2 or more generating resources, being generating units and aggregated generating facilities, that have a combined maximum authorized real power higher than 67.5 MW;
- (iii) a transformer that has its primary terminal and at least one secondary terminal energized at 100 kV or higher;
- (iv) a generating unit that has a maximum authorized real power higher than 18 MW where system access service is provided through a switchyard that is directly connected to transmission facilities energized at 100 kV or higher, including all system elements from the terminal of the generating unit to the transmission facilities energized at 100 kV or higher;

(v) an aggregated generating facility that has a maximum authorized real power higher than 67.5 MW where system access service is provided through a switchyard that is directly connected to transmission facilities energized at 100 kV or higher, including all system elements from the collector bus to the transmission facilities energized at 100 kV or higher, and excluding the generating units and the collector system feeders;

(vi) all generating units and aggregated generating facilities where system access service is provided through a common switchyard that is directly connected to transmission facilities energized at 100 kV or higher and the generating units and aggregated generating facilities have a combined maximum authorized real power higher than 67.5 MW, including all system elements from the terminal of each generating unit and from the collector bus of each aggregated generating facility to transmission facilities energized at 100 kV or higher, and excluding the generating units and collector system feeders of each aggregated generating facility;

(vii) a blackstart resource, including all system elements from the terminal of the blackstart resource to transmission facilities that are energized at 100 kV or higher; and

(viii) a static or dynamic reactive power resource that is dedicated to supplying or absorbing reactive power to or from the transmission system and is connected:

(a) to transmission facilities energized at 100 kV or higher;

(b) through a dedicated transformer that is directly connected to transmission facilities energized at 100 kV or higher; or

(c) through a non-dedicated transformer that has its primary terminal and at least one secondary terminal energized at 100 kV or higher, including all system elements from the terminal of the reactive power resource to the transmission facilities energized at 100 kV or higher.”

Attachments to Forwarding Notice

The following documents are attached to this Forwarding Notice:

1. [October 2020 Notification Letter](#);
2. [July 3, 2020 Forwarding Letter with the following attachments](#):
 - a) [Blackline and clean copies of the final proposed new and amended ARS-related definitions](#);
 - b) [July 23, 2020 Consultation Letter](#);
 - c) [August 8, 2019, Stakeholder Comments on Consultation Letter](#); and
 - d) [June 17, 2020 AESO Reply to Stakeholders Comments Letter](#).

If you have any questions, please contact the undersigned.

Sincerely,

“Melissa Mitchell-Moisson”

Melissa Mitchell-Moisson
 Regulatory Administrator
 Email: ars_comments@aeso.ca

Attachments