

March 25, 2021

To: The Alberta Utilities Commission

Re: Forwarding Notice – New Alberta Reliability Standard PER-006-AB-1, *Specific Training for Personnel*

The Alberta Electric System Operator (“AESO”) recommends that the Alberta Utilities Commission (“AUC or Commission”) approve the proposed new reliability standard PER-006-AB-1, *Specific Training for Personnel* (“PER-006-AB-1”), pursuant to Section 19 of the *Transmission Regulation*.

As the North American Electric Reliability Corporation (“NERC”) is recognized as the Electric Reliability Organization (“ERO”) by the Minister of Energy in Alberta, the AESO reviews the NERC reliability standards as they are approved by the Federal Energy Regulatory Commission (“FERC”) and recommends to the Commission whether, when and how they should be adopted in Alberta based on the applicable requirements of the *Transmission Regulation*.

Background

New PER-006-AB-1 is being proposed for adoption in Alberta. Proposed new PER-006-AB-1 requires the operator of a generating unit or aggregated generating facility to provide training to personnel who are responsible for the real time control of the generating unit or aggregated generating facility, on the operational functionality of protection systems and remedial action schemes that affect the output of the generating unit or aggregated generating facility.

The adoption of proposed new PER-006-AB-1 is important for maintaining the reliable operation of the interconnected electric system. The training of operating personnel on the protection systems that can affect the output of their machines can help expedite the restoration of a generating unit or aggregated generating facility to service or possibly help mitigate the loss of a machine during certain operating conditions.

The previous versions of reliability standards PRC-001-AB1-1, *Protection System Coordination* and PRC-001-AB2-1, *Protection System Coordination* contained a similar requirement. However, during the development of reliability standard PRC-001-AB3-1.3(ii), *Protection System Coordination* the AESO chose not to adopt this requirement for application in Alberta due to the requirement’s ambiguous language. In Project 2007-06, the NERC retired reliability standard PRC-001, *Protection System Coordination*, and has revised the language of this requirement to make it more succinct and practical, adding the requirement into a new NERC reliability standard PER-006-1, *Specific Training for Personnel* (“NERC PER-006-1”).

Summary of Proposed Changes

In developing the proposed new PER-006-AB-1, the AESO determined that certain Alberta variances are required to ensure that the NERC PER-006-1 is capable of being applied in Alberta and does not require a material change in the framework for the market for electric energy. A summary on these Alberta variances is as follows:

- The AESO is applying proposed new PER-006-AB-1 to all generating units and aggregated generating facilities that are part of the bulk electric system. However, there may be non-bulk electric system generating units and aggregated generating units that the AESO determines the requirements of PER-006-AB-1 should be applicable for maintaining the reliable operation of the interconnected electric system. As such, the AESO varied the applicability section to enable the AESO to include such facilities in the applicability of proposed new PER-006-AB-1.

In addition, the AESO made amendments to ensure consistent use of defined terms as included in the AESO’s *Consolidated Authoritative Document Glossary*. Administrative changes, such as formatting and

grammatical corrections, have also been made in the proposed new PER-006-AB-1.

Summary of AESO Consultation

On December 7, 2020, the AESO posted a Consultation Letter on its website requesting written comments from market participants and other interested parties (“Stakeholders”) with respect to the proposed new PER-006-AB-1 and notified Stakeholders in the AESO’s December 8, 2020 Stakeholder Newsletter.

On January 14, 2021, the AESO posted written comments received from Stakeholders on its website and notified Stakeholders in the AESO’s Stakeholder Newsletter. Please see the Stakeholder Comments Letter for a summary of written comments received.

On March 10, 2021, the AESO posted its replies to Stakeholder comments, including the amended proposed new PER-006-AB-1, on its website and notified Stakeholders in the AESO’s Stakeholder Newsletter. Please see the AESO Reply Letter for a summary of replies to written comments received, including the rationale or basis for the position of the AESO that explains why certain positions were rejected or accepted.

Attachments to Forwarding Notice

The following documents are attached to this Forwarding Notice:

1. December 7, 2020 Consultation Letter;
2. January 14, 2021 Stakeholder Comments Letter;
3. March 10, 2021 AESO Reply Letter; and
4. Clean copy of proposed new PER-006-AB-1.

Proposed Effective Date

The AESO recommends that the Commission approve the proposed new PER-006-AB-1 to become effective the first day of the calendar quarter that follows 8 full calendar quarters after approval by the Commission.

The AESO submits that the proposed new PER-006-AB-1 complies with the requirements of the *Transmission Regulation*, is not technically deficient, and is in the public interest.

If you have any questions, please contact the undersigned.

Sincerely,

Jodi Marshall

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