

# Stakeholder Comment Matrix and AESO Response Matrix

## ISO 2022 Tariff Modernization Application | Proposed New and Amended Definitions



Date of Request for Comment:	September 9, 2022
Period of Comment:	September 9, 2022 to October 7, 2022

The AESO received comments from stakeholders regarding the AESO’s proposed ISO tariff revisions, to be included in the 2022 Tariff Modernization Application via the questions set out in the Stakeholder Comment Matrix - Definitions posted on September 9, 2022. These comments have been posted on the AESO website.

Comments were received from the following stakeholders:

1. AltaLink;
2. Capital Power; and
3. Greengate Power Corporation.

Below you will find the AESO’s responses to the comments received from Stakeholders regarding the 2022 Tariff Modernization Application.

Definitions – New				
Existing	Proposed	AESO Rationale	Stakeholder Comments and/or Alternate Proposal	AESO Responses
No definition currently exists for use in the ISO Tariff	<b>"permit and licence"</b> means a permit and licence the <b>Commission</b> issues to construct and operate a <b>transmission facility</b> or any part of a <b>transmission facility</b> .	<i>This definition is needed to more clearly distinguish between tariff provisions that apply to connection projects for which new or amended permit and licence are required, and connection projects that do not require new or amended permit and licence.</i>	<p><b>AltaLink</b></p> <ol style="list-style-type: none"> <li>1. AltaLink notes that the AESO has introduced the concept of whether a new or amended Permit and License is required to distinguish between SASRs that require enhancements or expansions of the transmission system and those that do not and proceed through the AESO’s contract change and Behind the Fence process.</li> </ol> <p>Permits and Licenses are issued to TFOs and it is the TFO that determines whether a Permit and License needs to be changed. According to the EUA, it is the AESO’s role to determine whether a SASR would require an “expansion or enhancement of the capability of the transmission system” and then they would file a NID document with the Commission for that expansion or enhancement.</p>	<ol style="list-style-type: none"> <li>1. The AESO’s proposed adoption of the “Permit and Licence” definition was based, in part, on the references to permit and licence that already exist throughout the ISO tariff. However, the AESO acknowledges AltaLink’s comment and will consider whether it would be more appropriate to distinguish between connection projects that require a “NID approval” and those that do not.</li> </ol>

# Stakeholder Comment Matrix and AESO Response Matrix

ISO 2022 Tariff Modernization Application | Proposed New and Amended Definitions



			<p>AltaLink suggests that the AESO use this language as opposed to the concept of a Permit and License. AltaLink understands that when the AESO receives a SASR it will generally determine whether the transmission system needs to be expanded or enhanced; the AESO does not look at the Permits and Licenses which are issued to the TFO. According, AltaLink believes its suggested wording more correctly reflects the actual work done by the AESO in assessing a SASR.</p> <p>Further, some of AltaLink’s Permits and Licenses were issued quite some time ago and prior to the Commission including certain items on those Permits and Licenses (for example 25kV circuit breakers or telecom towers). Accordingly, a project that may not be deemed an “expansion or enhancement” of the transmission system, but may make minor modifications to an existing telecom tower for example, may be used by the TFO to update its Permit and License to include that tower if the Permit and License was issued prior to a time when telecom towers were included on Permits and Licenses.</p> <p><b>Capital Power</b></p> <ol style="list-style-type: none"> <li>Capital Power has no concerns with the proposed change at this time.</li> </ol> <p><b>Greengate Power Corporation</b></p> <ol style="list-style-type: none"> <li>Greengate does not see issues with the proposed definition.</li> </ol>	<ol style="list-style-type: none"> <li>The AESO acknowledges Capital Power’s comment.</li> <li>The AESO acknowledges Greengate’s comment.</li> </ol>
<p>No definition currently exists for</p>	<p>“<b>system transmission facilities</b>” means <b>transmission facilities</b> or the portion of a</p>	<p><i>The content of this definition is already contained and repeated in the ISO tariff. This</i></p>	<p><b>AltaLink</b></p> <ol style="list-style-type: none"> <li>The definition entry “system transmission facilities” for the Consolidated Authoritative Document Glossary is the same as used in Section 3.4(1)(a)(iii)</li> </ol>	<ol style="list-style-type: none"> <li>Regarding section 3.4(1)(d), please see the AESO’s response to AltaLink in the Stakeholder Comments Matrix, Section 3.</li> </ol>

# Stakeholder Comment Matrix and AESO Response Matrix

## ISO 2022 Tariff Modernization Application | Proposed New and Amended Definitions



<p>use in the ISO Tariff</p>	<p><b>transmission facility</b> that the ISO determines to be required for the benefit of many <b>market participants</b>.</p>	<p><i>definition is being proposed in order to eliminate that repetition.</i></p>	<p>and Section 4.2(3) so there is no objection to this definition.</p> <p>AltaLink would like to understand why Section 3.4(1)(d) is also being removed. Please see our comments in the Stakeholder Comments Matrix, Section 3.</p> <p><b>Capital Power</b></p> <p>5. Capital Power has no concerns with the proposed change at this time.</p> <p><b>Greengate Power Corporation</b></p> <p>6. Greengate does not see issues with the proposed definition.</p>	<p>5. The AESO acknowledges Capital Power's comment.</p> <p>6. The AESO acknowledges Greengate's comment.</p>
------------------------------	--	---	--	---

**Definitions – Amended**

Existing	Proposed	AESO Rationale	Stakeholder Comments and/or Alternate Proposal	
<p>“radial circuit” means an arrangement of contiguous system elements extending from a single system element on the networked transmission system in</p>	<p>“radial circuit” means an arrangement of contiguous system elements <del>extending from energized at 50 kV or higher that:</del></p> <p><u>(a single) extend from a system element on the networked transmission system in a linear or branching configuration;</u></p> <p><u>(b) connect to the facilities of one or more market participants, which is of a load facility, a generating unit, or an aggregated generating facility; and</u></p>	<p><i>Changing ISO Tariff CADG definition of “radial circuit” to align with the existing CADG Alberta Reliability Standards definition of “radial circuit” [Alberta Reliability Standards (2020-08-06)]</i></p>	<p><b>AltaLink</b></p> <p>7. No comments.</p> <p><b>Capital Power</b></p> <p>8. Capital Power has no concerns with the proposed change at this time.</p> <p><b>Greengate Power Corporation</b></p> <p>9. Greengate does not understand the last part of the definition where a transmission circuit is energized below 50 kV.</p>	<p>7. The AESO acknowledges AltaLink's comment.</p> <p>8. The AESO acknowledges Capital Power's comment.</p> <p>9. The reference in the Alberta Reliability Standards definition of “radial circuit” to facilities energized at less than 50 kV is intended to address circumstances where there are multiple circuits that connect to separate sections of the same ring bus in a substation. For instance, where two circuits, Circuit 1 and Circuit 2, connect to separate sections of the same ring bus in a substation and are connected by a normally-closed bridging breaker on the low voltage-side, which is less than 50 kV. In alignment with the findings of NERC's White Paper on Bulk Electric System Radial Exclusion (E1) Low Voltage Loop Threshold, the AESO assumes that the high-side circuits would not experience power flow reversal in</p>

# Stakeholder Comment Matrix and AESO Response Matrix

ISO 2022 Tariff Modernization Application | Proposed New and Amended Definitions



<p>a linear or branching configuration to the facilities of one or more market participants, which is the only circuit for power to flow between the networked transmission system and the facilities of one or more market participants under normal operating conditions, including when the circuit is connected to another circuit through a switching</p>	<p><u>(c) comprise</u> the only circuit <del>for</del> <u>by which</u> power <del>to</del> <u>can</u> flow between the networked transmission system and the facilities <del>of one or more market participants</del> <u>identified in item (b)</u> under normal operating conditions, <del>including when</del> <u>and includes an arrangement where</u> the circuit <u>energized at 50 kV or higher</u> is connected to another circuit <u>energized at 50 kV or higher, either through a switching device that is operated normally open or through facilities energized at less than 50 kV where the circuit would be a radial circuit if the connection did not exist.</u></p>			<p>the majority of cases that will be encountered in industry. Therefore, in those examples, Circuit 1 and Circuit 2 would be considered radial circuits.</p>
--	---	--	--	---

# Stakeholder Comment Matrix and AESO Response Matrix

ISO 2022 Tariff Modernization Application | Proposed New and Amended Definitions



device that is operated normally open. [Tariff (2021-01-01)]				
---	--	--	--	--