

## Stakeholder Comments – 2022 Tariff Modernization Application Definitions

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.

Thank you to all stakeholders who participated in this consultation. If you have any questions, please submit them to [tariffdesign@aeso.ca](mailto:tariffdesign@aeso.ca).

# Stakeholder Comment Matrix – September 9, 2022

ISO 2022 Tariff Modernization Application | Proposed New and Amended Definitions



Date of Request for Comment: <u>September 9, 2022</u>	Contact: <u>Joe Petratur</u>
Period of Consultation: <u>September 9, 2022</u> through <u>October 7, 2022</u>	Email: <u>Joe.Petrature@AltaLink.ca</u>
Comments From: <u>AltaLink</u>	
Date [yyyy/mm/dd]: <u>2022/10/07</u>	

## Instructions

1. Please fill out the section above as indicated.
2. Please respond to the questions below and provide your specific comments.
3. **Please submit one completed comment matrix per organization.**
4. **Stakeholder comment matrices will be published on [aeso.ca](https://aeso.ca), in their original state.**
5. Email your completed comment matrix to [tariffdesign@aeso.ca](mailto:tariffdesign@aeso.ca) by **Oct. 7, 2022**.

## Request for feedback

Listed below is the summary description of changes for proposed new and amended definitions related to proposed 2022 Tariff Modernization Application. Please refer back to the engagement page to view related materials. Please place your comments/reasons for position underneath (if any).

Definitions – New			
Existing	Proposed	AESO Rationale	Stakeholder Comments and/or Alternate Proposal
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>	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.  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

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			<p>a NID document with the Commission for that expansion or enhancement. 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>
No definition currently exists for use in the ISO Tariff	<p><b>“system transmission facilities”</b> means <b>transmission facilities</b> or the portion of a <b>transmission facility</b> that the <b>ISO</b> determines to be required for the benefit of many <b>market participants</b>.</p>	<p><i>The content of this definition is already contained and repeated in the ISO tariff. This definition is being proposed in order to eliminate that repetition.</i></p>	<p>The definition entry “system transmission facilities” for the Consolidated Authoritative Document Glossary is the same as used in Section 3.4(1)(a)(iii) 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>

**Definitions – Amended**

Existing	Proposed	AESO Rationale	Stakeholder Comments and/or Alternate Proposal
<p><b>“radial circuit”</b> means an arrangement of contiguous system elements extending from a single system element on the networked transmission system in a</p>	<p><b>“radial circuit”</b> means an arrangement of contiguous system elements energized at 50 kV or higher that:</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>No comments.</p>

# Stakeholder Comment Matrix – September 9, 2022

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



<p>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 device that is operated normally open.</p> <p>[Tariff (2021-01-01)]</p>	<p>(a) extend from a system element on the networked transmission system in a linear or branching configuration;</p> <p>(b) connect to one or more of a load facility, a generating unit, or an aggregated generating facility; and</p> <p>(c) comprise the only circuit by which power can flow between the networked transmission system and the facilities identified in item (b) under normal operating conditions,</p> <p>and includes an arrangement where the circuit energized at 50 kV or higher is connected to another circuit 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.</p>		
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# Stakeholder Comment Matrix – September 9, 2022

ISO 2022 Tariff Modernization Application | Proposed New and Amended Definitions



Date of Request for Comment: <u>September 9, 2022</u>	Contact: <u>Megan Gill</u>
Period of Consultation: <u>September 9, 2022</u> through <u>October 7, 2022</u>	Email: <u>mgill@capitalpower.com</u>
Comments From: <u>Capital Power</u>	
Date [yyyy/mm/dd]: <u>October 7, 2022</u>	

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## Request for feedback

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Definitions – New			
Existing	Proposed	AESO Rationale	Stakeholder Comments and/or Alternate Proposal
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>	Capital Power has no concerns with the proposed change at this time.

# Stakeholder Comment Matrix – September 9, 2022

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



<p>No definition currently exists for use in the ISO Tariff</p>	<p><b>“system transmission facilities”</b> means <b>transmission facilities</b> or the portion of a <b>transmission facility</b> that the <b>ISO</b> determines to be required for the benefit of many <b>market participants</b>.</p>	<p><i>The content of this definition is already contained and repeated in the ISO tariff. This definition is being proposed in order to eliminate that repetition.</i></p>	<p>Capital Power has no concerns with the proposed change at this time.</p>
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### Definitions – Amended

Existing	Proposed	AESO Rationale	Stakeholder Comments and/or Alternate Proposal
<p><b>“radial circuit”</b> means an arrangement of contiguous system elements extending from a single system element on the networked transmission system in 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 device that is operated normally open.</p>	<p><b>“radial circuit”</b> means an arrangement of contiguous system elements energized at 50 kV or higher that:</p> <ul style="list-style-type: none"> <li>(a) extend from a system element on the networked transmission system in a linear or branching configuration;</li> <li>(b) connect to one or more of a load facility, a generating unit, or an aggregated generating facility; and</li> <li>(c) comprise the only circuit by which power can flow between the networked transmission system and the facilities identified in item (b) under normal operating conditions,</li> </ul>	<p><i>Changing ISO Tariff CADG definition of <b>“radial circuit”</b> to align with the existing CADG Alberta Reliability Standards definition of <b>“radial circuit”</b> [Alberta Reliability Standards (2020-08-06)]</i></p>	<p>Capital Power has no concerns with the proposed changes at this time.</p>

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[Tariff (2021-01-01)]	and includes an arrangement where the circuit energized at 50 kV or higher is connected to another circuit 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.		
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# Stakeholder Comment Matrix – September 9, 2022

ISO 2022 Tariff Modernization Application | Proposed New and Amended Definitions



Date of Request for Comment: <u>September 9, 2022</u>	Contact: <u>Scott Perry</u>
Period of Consultation: <u>September 9, 2022</u> through <u>October 7, 2022</u>	Email: <u>Scott@Greengatepower.com</u>
Comments From: <u>Greengate Power Corporation</u>	
Date [yyyy/mm/dd]: <u>2022/10/07</u>	

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# Stakeholder Comment Matrix – September 9, 2022

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<p>No definition currently exists for use in the ISO Tariff</p>	<p><b>“system transmission facilities”</b> means <b>transmission facilities</b> or the portion of a <b>transmission facility</b> that the ISO determines to be required for the benefit of many <b>market participants</b>.</p>	<p><i>The content of this definition is already contained and repeated in the ISO tariff. This definition is being proposed in order to eliminate that repetition.</i></p>	<p>Greengate does not see issues with the proposed definition.</p>
Definitions – Amended			
Existing	Proposed	AESO Rationale	Stakeholder Comments and/or Alternate Proposal
<p>“<b>radial circuit</b>” means an arrangement of contiguous system elements extending from a single system element on the networked transmission system in 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 device that is operated normally open.</p>	<p>“<b>radial circuit</b>” means an arrangement of contiguous system elements <del>extending from energized at 50 kV or higher that:</del>  <u>(a single) extend from a</u> system element on the networked transmission system in a linear or branching configuration;  <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>  <u>(c) comprise</u> the only circuit <del>for by which</del> power <del>to can</del> flow between the networked transmission system and the</p>	<p><i>Changing ISO Tariff CADG definition of “<b>radial circuit</b>” to align with the existing CADG Alberta Reliability Standards definition of “<b>radial circuit</b>” [Alberta Reliability Standards (2020-08-06)]</i></p>	<p>Greengate does not understand the last part of the definition where a transmission circuit is energized below 50 kV.</p>

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[Tariff (2021-01-01)]	<p>facilities <del>of one or more market participants identified in item (b)</del> under normal operating conditions, <del>including when</del></p> <p><del>and includes an arrangement where</del> the circuit <del>energized at 50 kV or higher</del> is connected to another circuit <del>energized at 50 kV or higher, either</del> through a switching device that is operated normally open <del>or through facilities energized at less than 50 kV where the circuit would be a radial circuit if the connection did not exist.</del></p>		
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