

Date of Request for Comment: <u>November 25, 2016</u> Period of Comment: <u>November 25, 2016</u> through <u>January 6, 2017</u> Comments From: <u>EPCOR Distribution & Transmission Inc. [EDTI]</u> Date [yyyy/mm/dd]: <u>2017/01/06</u>	Contact: <u>Travis Robinson</u> Phone: <u>780-412-3079</u> Email: <u>trobenson@epcor.com</u>
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Please place your comments/reasons for position (if any), in response to the questions set out below, in the following matrix.

Questions	Stakeholder Comments and/or Alternate Proposal
<p>The AESO is seeking comments from stakedholders with regard to the following matters:</p> <ol style="list-style-type: none"> 1. Do you agree or disagree that proposals 1 through 13 presented in the Section 502.11 Discussion Paper represent the minimum technical requirements for substations? If you disagree, please provide comments. 2. Are any of the proposals in the Section 502.11 Discussion Paper unclear? If yes, please indicate the proposal number and describe how the clarity of the proposal could be improved. 	<p><i>Comment # 1:</i></p> <p>In Section 3.2, Major vs. General Substation, EDTI recommends that the definition for “Major substations” to be aligned with those facilities determined to be have a medium impact rating according to Alberta Reliability Standard CIP-002-AB-5.1 Attachment 1.</p> <p><i>Comment # 2:</i></p> <p>EDTI suggests only using one term in Rule Section 502.11 to define major substation, either “Major substations” or “Type 1 substations”, not both interchangeably throughout the document. That will likely cause some confusion.</p> <p><i>Comment # 3:</i></p> <p>Section 3.9, Proposal #7 h states, Section 3.6, Proposal #3 a states, “If all three voltage levels are present, failure of an autotransformer must not result in tripping more than four (4) circuit breakers... The following figure illustrates this requirement:” However the figure below the statement does not show the same condition.</p> <p><i>Comment # 4:</i></p>

	<p>Section 3.11, Proposal #9 e states, “Either Bank A or Bank B must have a minimum discharge time of (8) hours at the <u>connected load</u>.”[emphasis added] Does the term “connected load” refer to the total station load or the load that is normally connected to the individual battery bank? Are the battery banks required to be completely redundant, capable of supporting the entire station load and a minimum discharge time of 8 hours?</p>
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