

**Development of Proposed Amended Section 502.9 of the ISO rules, *Synchrophasor Measurement Unit Technical Requirements***

<p><b>Period of Comment:</b> July 13, 2020 through August 14, 2020</p> <p><b>Comments From:</b> AltaLink</p> <p><b>Date:</b> August 13, 2020</p>	<p><b>Contact:</b> Jenette Yearsley</p> <p><b>Phone:</b> 403-387-8275</p> <p><b>Email:</b> Jenette.Yearsley@AltaLink.ca</p>
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Instructions:

1. Please fill out the section above as indicated.
2. Please refer back to the Consultation Letter under the “Attachments” section to view materials related to the proposed amendment to Section 502.9.
3. Please respond to the questions below and provide your specific comments (if any). Blank boxes will be interpreted as favourable comments.

***The AESO is seeking comments from Stakeholders on the development of a proposed amendment to Section 502.9 with regard to the following matters:***

	Development of a Proposed ISO Rule	Stakeholder Comments and/or Alternate Proposal
1.	Do you agree or disagree that the issue identified requires the development of a proposed amendment to Section 502.9? Please comment.	AltaLink is unable to comment as it is unclear why IEEE Standard C37.118-2005 is no longer an appropriate reference and why it is necessary for Section 502.9 to reference the most current version of the IEEE Standard C37.118.

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2.	<p>Do you agree or disagree with the potential objective or purpose of a proposed amendment to Section 502.9? Please comment.</p>	<p>AltaLink agrees with the AESO’s high level objective of reducing regulatory burden.</p> <p>AltaLink is, however, deeply concerned that ongoing automatic changes in ISO Rule requirements potentially drives unnecessary costs and continuously presents a non-compliance risk to facility owners. Ultimately, the degree of concern is heavily dependent on exactly how this proposed change is incorporated within the Rule’s text. While AltaLink recognizes that the proposed amendments have not yet been tabled, AltaLink has the following concerns regarding automatic changes to ISO Rules to incorporate the latest version of IEEE standard:</p> <ol style="list-style-type: none"> <li>1. A revised IEEE standard may contain requirements for Synchrophaser Measurement Units unnecessary for Alberta. If these revised requirements have a cost premium, this represents an unnecessary cost. This automatic update eliminates the necessary checks needed to confirm the altered requirements in the latest version of the IEEE standard are indeed required in Alberta.</li> <li>2. Automatic updates of referenced external standards results in ISO Rule requirements for even in-service Synchrophaser Measurement Units to constantly be changing. This creates 2 problems for owners:             <ol style="list-style-type: none"> <li>a. All owners of these facilities will need to constantly monitor these external standards to identify, in advance, new revisions. When a new revision is imminent, the owners will need to perform a detailed evaluation of the changes and then assess if the Synchrophaser Measurement Units that they own meet the new requirements, require modifications to meet the new requirements or need to be replaced to meet the new requirements. Depending on how frequently this particular standard changes, this could be quite burdensome.</li> <li>b. When a change has been identified and existing Synchrophaser Measurement Unit requires modification or replacement, this introduces unexpected and not necessarily insignificant costs for the owner.</li> </ol> </li> <li>3. There is often a lag between IEEE updating a standard and manufacturers updating their products to meet the new IEEE standard. This creates periods when it may not be possible for an owner to procure equipment to comply with the latest standard. During these periods it may be impossible for an owner to be in compliance with the latest IEEE standard.</li> </ol>



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3	Do you agree or disagree with the proposed form of consultation and timelines? Please comment.	AltaLink agrees that a written consultation process is appropriate. AltaLink looks forward to reviewing the specific amendments being proposed in the next round of consultation and will provide any further comments in writing regarding the specific language of the proposed amendments.
	Do you intend to participate in any related consultation? <b>OR</b> Do you agree that no consultation group is required for this rule development? Please comment.	AltaLink intends to continue to participate in any further related consultation.
	Do you have any additional comments?	If the AESO intends to extend this approach of automatic updates to other ISO Rules, AltaLink recommends that the AESO hold a dedicated consultation process on how this may be best performed to meet the objective of regulatory efficiency while not unintentionally driving unnecessary costs or placing facility owners at non-compliance risk.