

July 3, 2020

To: Alberta Utilities Commission (“AUC” or “Commission”)

Re: Forwarding Notice – New and Amended Alberta Reliability Standard Definitions:

- 1) Proposed new “radial circuit”;**
- 2) Proposed new “system access service” and**
- 3) Proposed amended “bulk electric system”**

(collectively referred to as “new and amended ARS-related definitions”)

The Alberta Electric System Operator (“AESO”) recommends that the Commission approve the proposed new and amended ARS-related definitions, pursuant to Section 19 of the *Transmission Regulation*.

Consistent with the AESO’s drafting principles for authoritative documents, the AESO has determined that it is appropriate for defined terms used in the reliability standards to go through the same consultation and forwarding process as the reliability standards themselves.

Background

The existing “bulk electric system” definition in the AESO [Consolidated Authoritative Document Glossary](#) (“CADG”) is quite general, and lacks clarity and specificity. To address this, the AESO’s current practice is to add details to the applicability sections of reliability standards to compensate for the general wording in the existing “bulk electric system” definition. For example, the current definition does not include the minimum sizes of generating units and aggregated generating facilities that are part of the bulk electric system. Consequently, the minimum sizes of the generating units and aggregated generating facilities are added to the applicability section of reliability standards. The proposed amended definition provides clarity and specificity such that the applicability section of reliability standards that apply at the bulk electric system level can be simplified. More importantly, however, is that the proposed amended definition more clearly identifies the bulk electric system facilities that are important for maintaining reliable operation of the electricity system within Alberta.

The term “radial circuit” is a new definition that is being proposed for use in the proposed amended definition of “bulk electric system”. The definition of “radial circuit” is consistent with how the AESO currently classifies affected circuits in applicable reliability standards and includes two clarifications that are in the NERC “bulk electric system” definition as these clarifications have been assessed to be appropriate for use in the broader application of the definition “radial circuit”. These clarifications identify how circuits are treated that are energized at 50 kV or higher and have a normally open point between them; and how circuits are treated that create a contiguous loop, where part of the loop includes a connection energized at less than 50 kV.

The term “system access service” is an existing defined term in the CADG for use in the ISO tariff, and is now being proposed for use in the reliability standards. This term is used in the proposed amended definition of “bulk electric system” to identify the substation that a generating unit or aggregated generating facility connects through to the transmission system. The identification of this substation is then used to determine if the generating unit or aggregated generating facility connects at a bulk electric system voltage level of 100 kV or higher.

The following new defined terms, along with their related definitions are proposed for incorporation into the AESO’s CADG for use in the reliability standards:

- a) radial circuit; and
- b) system access service.

The following existing reliability standards defined term along with its related definition is proposed to be amended in the AESO's CADG for use in the reliability standards:

- a) bulk electric system.

AESO Consultation

On July 23, 2019, 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 and amended ARS-related definitions, and notified market participants in the AESO Stakeholder Newsletter.

On August 8, 2019, the AESO posted written comments received from Stakeholders and other interested parties, in response to the Consultation Letter, on its website and notified market participants in the AESO Stakeholder Newsletter. Please see the [Stakeholder Comments](#) on Consultation Letter for a summary of written comments received.

Stakeholder comments generated further review and consideration of the proposed new and amended ARS-related definitions and on June 17, 2020, the AESO posted its replies to Stakeholder comments, including the final proposed new and amended ARS-related definitions on its website, and notified Stakeholders in the AESO Stakeholder Newsletter. Please see the [AESO Reply to Stakeholders Comments Letter](#) for a summary of replies to written comments received, as well as the rationale or basis for the position of the AESO that explains why certain positions were accepted or rejected.

Based on a comment received from ATCO Electric Ltd., section (viii) in the bulk electric system definition was revised to include all system elements from the terminal of a bulk electric system reactive power resource to transmission facilities energized at 100 kV or higher. This revision helps to ensure the reliable operation of the system elements that provide the connection between a reactive power resource that is part of the bulk electric system and the transmission facilities that are part of the bulk electric system.

Proposed Effective Date

The AESO recommends that the Commission approve the final proposed new and amended ARS-related definitions to become effective upon approval by the Commission.

The AESO submits that the final proposed new and amended ARS-related definitions comply with the requirements of the *Transmission Regulation*, are not technically deficient, and are in the public interest.

Attachments to Forwarding Notice

The following documents are attached to this Forwarding Notice:

1. [Blackline](#) and [clean](#) copies of the final proposed new and amended ARS-related definitions;
2. [July 23, 2020 Consultation Letter](#);
3. [August 8, 2019, Stakeholder Comments on Consultation Letter](#); and
4. [June 17, 2020, AESO Reply to Stakeholders Comments Letter](#).

If you have any questions, please contact the undersigned.

Sincerely,

"Melissa Mitchell-Moisson"

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Attachments