

Stakeholder Comments and AESO Reply Matrix

Proposed Administrative Amendments to an ISO Rule
 Proposed Administrative Amendments to Section 502.8 of the ISO rules, *SCADA Technical and Operating Requirements* (“Section 502.8”)



Date of Request for Comment: January 5, 2021

Period of Comment: January 5, 2021 through January 22, 2021

AESO Consultation Questions	Stakeholder Comments	AESO Replies
Do you agree or disagree that the issues identified in the Letter of Notice require the proposed administrative amendments to Section 502.8? Please comment.	<p>AltaLink Management Ltd. (“AltaLink”)</p> <ol style="list-style-type: none"> AltaLink is supportive of all opportunities to reduce “red tape”. Eliminating unnecessary requirements or streamlining processes are important elements in continuing to make the industry more efficient. The requirements specified in the Rule do not appear to have changed except for one minor modification (see below). 	<p>AltaLink</p> <ol style="list-style-type: none"> The AESO acknowledges AltaLink's comment.
	<p>ENMAX Power Corp. (“ENMAX”)</p> <ol style="list-style-type: none"> No comment at this time. 	<ol style="list-style-type: none"> The AESO acknowledges ENMAX's comment.
	<p>EPCOR Distribution and Transmission Inc. (“EDTI”)</p> <ol style="list-style-type: none"> EDTI agrees that the issues identified in the Letter of Notice require the proposed amendments to Section 502.8. 	<ol style="list-style-type: none"> The AESO acknowledges EDTI's comment.

<p>Do you agree or disagree with the proposed administrative amendments to Section 502.8? Please comment.</p>	<p>AltaLink</p> <p>4. As the requirements specified in the Rule do not appear to have changed except for one minor modification (see below), AltaLink has no concerns with the administrative changes.</p> <p>The only requirement noted that did change slightly was the resolution on “All analog measurements not otherwise specified below” in Table 2. This changed slightly from “0.5% of the point being monitored” to “0.1”. As units are not provided, we interpret that the revised requirement is to provide resolution to “1 decimal place” of resolution in the analog quantities units.</p> <p>Provided our interpretation is correct, we do not anticipate any issues with complying with this revised requirement. If the AESO proceeds with this Rule amendment, we recommend the AESO add some additional clarity in the final version.</p>	<p>4. The AESO confirms that AltaLink’s interpretation of the meaning of “0.1” in <i>Table 2 – Accuracy and Resolution Requirements by Measurement Type</i> (“Table 2”) is correct.</p>
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ENMAX

5. Table 2

Table 2
Accuracy and Resolution Requirements by Measurement Type

Measurement Type	Units	Accuracy	Resolution
All facilities			
All analog measurements not otherwise specified below		+/-2% of full scale	0.1
Frequency (between 55 Hz and 65 Hz only)	Hz	+/- 0.012 Hz	0.001 Hz
Transformer tap position	Position	Integer Value	1
Renewable aggregated generating facilities			
Ambient temperature (for solar facilities)	°C	+/-1 °C	1°C
Barometric pressure	hPa	6 hPa	1 hPa
Global horizontal irradiance (for solar facilities)	W/m ²	+/-25 W/m ²	1 W/m ²
Potential real power capability	MW	+/-10% of full scale	0.5% of measurement
Wind direction from true north	Degrees	+/-5°	1°
Regulating reserve			
Regulating reserve measurements	MW	0.25% of Full Scale	0.25% of measurement

(a) “% of measurement” as used in Table 2 – Can the AESO provide a definition of the term and/or an example in the context of its use in Table 2 so that it is clear what is required from market participants?

(b) Table 2 Frequency, column “Resolution” 0.001 Hz” – ENMAX seeks to better understand what value 0.001 Hz provides over 0.01 Hz when the accuracy is +/- 0.012 Hz?

(c) Applicability

(3) ~~Notwithstanding subsection 3(1),~~ the legal owner of a generating unit, transmission facility, aggregated generating facility or a load facility must, notwithstanding subsection 3(1) comply with the provisions of this Section 502.8 if:

- (a) it modifies its facilities after April 7, 2017 to:
 - (i) increase its Rate DTS or Rate STS contract capacity; or
 - (ii) upgrade or alter the functionality of its supervisory control and data acquisition ~~data~~ system; **and**
- (b) the ISO determines that such compliance is necessary for safe and reliable operation of the interconnected electric system.

If a plant proceeds to change its MC with the AESO, will 3(a)(i) in the above image apply? If so, before there is a need to comply, will the ISO need

5. (a) To add clarity, the AESO will revise the potential **real power** capability resolution to “0.1” from “0.5% of measurement”. This change aligns with the intent of the original requirement.

The AESO will be revising the information document ID #2012-013R, *Supervisory Control & Data Acquisition* (“ID #2012-013R”). The AESO will consider adding a definition of the term “% of measurement” and/or an example in the context of its use in Table 2 to assist market participants in understanding this term. The amended information document will be available if, and when, the proposed amended Section 502.8 is approved by the Alberta Utilities Commission.

(b) A “resolution” of 0.001 Hz provides the AESO with a better understanding of the actual frequency of system elements than would be provided by a frequency resolution of 0.01 Hz.

The AESO is only proposing administrative amendments to Section 502.8 at this time, primarily to reduce and streamline regulatory requirement. The resolution requirement, 0.001 Hz, aligns with the existing Section 502.8 requirement. However, the AESO may further assess this requirement in future amendments to Section 502.8 to determine if material changes are needed.

(c) ENMAX has interpreted subsection 3 of the proposed amended Section 502.8 correctly.

(d) ENMAX is correct, the highlighted word “data” is a typo. The AESO will amend the proposed amended Section 502.8 to remove the word “data”.

	<p>to determine that such compliance is necessary for the safe and reliable operation of the interconnected electric system? It is unclear given the location of the highlighted word “and” as it is located on the Roman numeral level of indentation in the list.</p> <p>(3) Notwithstanding subsection 3(1), the legal owner of a generating unit, transmission facility, aggregated generating facility or a load facility must, notwithstanding subsection 3(1) comply with the provisions of this Section 502.8 if:</p> <ul style="list-style-type: none"> (a) it modifies its facilities after April 7, 2017 to: <ul style="list-style-type: none"> (i) increase its Rate DTS or Rate STS contract capacity; or (ii) upgrade or alter the functionality of its supervisory control and data acquisition data system; and <p>(d) There appears to be a potential typo under subsection (3)(3)(a)(ii). Should the highlighted word “data” be removed?</p>	
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	<p>EPCOR</p> <p>6. EDTI agrees with the proposed administrative amendments to Section 502.8.</p>	<p>6. The AESO acknowledges EDTI's comment.</p>
<p>Do you agree or disagree with the proposed form of consultation and timelines? Please comment.</p>	<p>AltaLink</p> <p>7. AltaLink agrees with the form of consultation. Minor changes, like this one, should not require more elaborate forms of consultation. The timeline to review and provide comments was a bit short. It is challenging to divert resources from ongoing business to perform a detailed review of a Rule to understand the extent</p>	<p>7. The AESO acknowledges AltaLink's comment.</p>

	<p>of the changes. In this particular case, this was challenging as it was hard to ascertain the extent or nature of the changes through the multiple blackline edits. Perhaps there is a summary of key proposed changes could be provided by the AESO as part of the process.</p>	
	<p>ENMAX</p> <p>8. Agree.</p>	<p>8. The AESO acknowledges ENMAX's comment.</p>
	<p>EPCOR</p> <p>9. EDTI agrees with the proposed form of consultation and timelines.</p>	<p>9. The AESO acknowledges EDTI's comment.</p>
<p>Do you agree or disagree that no consultation group is required for this ISO rule development? Please comment.</p>	<p>AltaLink</p> <p>10. AltaLink agrees that a consultation group is not required as long as the scope of the Rule change is administrative in nature.</p>	<p>10. The AESO acknowledges AltaLink's comment.</p>
	<p>ENMAX</p> <p>11. Agree.</p>	<p>11. The AESO acknowledges ENMAX's comment.</p>

	<p>EPCOR</p> <p>12. EDTI agrees that no consultation group is required for the proposed administrative amendments.</p>	<p>12. The AESO acknowledges EDTI's comment.</p>
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