AESO Discussion Paper – Intertie Restoration Initiative
Stakeholder Comment Matrix
(AltaLink Comments)

Section	Subsection	Stakeholder Response
2.0 Intertie Restoration Policy	**2.1 Obligation to Restore Capacity**	AltaLink concurs with the AESO's view that "the legislation and policy framework clearly identify import and export capacity as cornerstones of a healthy market. Increasing intertie capacity is part of the AESO's duty both to maintain reliability as well as to promote a FEOC market."
	2.2 Cost Allocation **a. Transmission Development Policy** **b. Import restoration cost allocation** **c. Export restoration cost allocation** **d. Variable cost flow through?**	AltaLink agrees with the AESO that the proposed products are temporary "non-wires" solution to address congestion problem that impact the ability of the market to access the intertie for both imports and exports. AltaLink is of the view that the cost allocation for import and export restoration should reflect the principles set out in Transmission Policy and Regulation and encourage the utilization of restored capacity to the extent possible in order to maximize the reliability and market benefits.
3.3 Options to Increase Import ATC	**3.3 Options** **a. LSSi to be pursued** **b. ILRAS not an option at this time** **c. Service available for in market use as opposed to emergency use only?** **d. Others?**	The definition of proposed LSSi (see Section 6.0) only allows load assets to participate. The desired effect of LSSi is to either reduce the demand and/or increase the supply in the system in the event of an intertie trip under an import scenario. Restricting this product to load assets would eliminate the opportunity for fast response supply assets (< 12 cycles) to provide this service. AltaLink would request the AESO to consider any asset that has the capability of providing either a reduction of demand and/or an increase of supply in the system to be eligible for the new product

		as long as it meets specific technical requirements set out by the AESO. The draft Technical Requirement (Section 6.0) also specifies that the Service Provider must have the capability to supply the service for up to 60 minutes. AltaLink requests the AESO to consider a shorter duration interval for the product. LSSi is intended to maintain system stability in the event of intertie trip during the short period after losing import and before other fast response generation assets and operating reserve being dispatched up to replace imports. LSSi should not be used to manage the energy requirement of the system. In fact, using LSSi for longer duration could impact price signals and violates the FEOC principles.
	3.4 Next Steps **a. Form working group**	AltaLink is interested in participating in the LSSi working group.

4.3 Options to Increase Export ATC	**4.3 Options** **a. GRAS to increase export limit to 935 MW** **b. No GRAS to increase SOK flow limit** **c. Integrate wind forecast into export ATC limit** **d. Service available for in market use?** **e. Others?**	The definition of proposed GRAS only allows generation asset to participate in GRAS products. The desired effect of GRAS is to either reduce generation and/or increase load in the system in the event of an intertie trip under an export scenario. Restricting this product to generation assets would limit fast response load (< 14 cycles) and/or other assets from supplying this service. AltaLink would request the AESO to consider any asset that has the capability to meet specific technical requirements set out by the AESO to be eligible for the new product. AltaLink recognizes the GRAS product design is more complex and requires further studies. The AESO Paper indicates that GRAS trip signals must be provided from facilities owned and operated by TFO. Further clarification is required with respect to the need for additional protection and control equipment in order for TFO to implement GRAS. AltaLink has concerns on liability issue with respect to potential failure of GRAS resulted from malfunction of TFO owned assets.
	4.4 Next Steps **a. Form Working Group**	AltaLink is interested in participating in the GRAS working group.
5.0 Conclusions and Next Steps	**5.0 Conclusions and Next Steps** **a. Form Independent Working Group** **b. Should variable costs of services be charged to users?**	AltaLink supports the concept of forming working groups to further advance the intertie capacity restoration initiatives.