

NOTICE OF SPECIFIED PENALTY

Date of Issue: March 29, 2021		Payment Due Date: April 30, 2021	
MSA File Number	RS2020-276 and RS2020-277	Specified Penalty Amount¹	\$2,250
Registered Entity Name	Western Sustainable Power Inc.		
Reliability Standard	FAC-008-AB-3	Self-Report	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
Requirement	R2 and R6	Accepted Mitigation Plan	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
Date of Referral/Self Report	December 4, 2020	Date of Contravention	January 1, 2020 until Mitigation Plan Complete

EVENT DETAILS

Pursuant to the Alberta Electric System Operator (AESO) Alberta Reliability Standards 2020-2022 Audit Schedule, the AESO conducted a scheduled Q3/2020 compliance monitoring audit of Western Sustainable Power Inc. The applicable audit period with respect to FAC-008-AB-3 extended from January 1, 2020 to June 30, 2020. Based upon the AESO's audit findings, the MSA finds that FAC-008-AB-3 was contravened as follows:

1) From January 1, 2020 until the applicable mitigation plan activities are completed, Western Sustainable Power Inc.'s documented methodology with respect to transmission facilities found at an aggregated generating facility did not include the following:

- the underlying assumptions, design criteria, and methods used to determine the equipment ratings identified in requirement R2.1 and did not include identification of how each of the following was considered: equipment rating standards, operating limitations, ambient conditions, and summer and winter season operation; and
- the ten (10) minute duration for emergency ratings for transmission lines was not specified in Western Sustainable Power's documentation.

FAC-008-AB-3 R2 states, in part:

R2 Each **legal owner** of a **generating unit** and **legal owner** of an **aggregated generating facility** must have a documented methodology for determining the **facility ratings** of its facilities connected between the location specified in requirement R1 and the interface with a **transmission facility** (based on equipment ownership) that contains all of the following:

R2.1 the method used to establish the **equipment ratings** of the equipment that comprises the facility must be consistent with at least one (1) of the following:

- (a) ratings provided by equipment manufacturers or obtained from equipment manufacturer specifications, such as the nameplate rating;
- (b) one (1) or more industry standards developed through an open process such as the IEEE or the International Council on Large Electric Systems ("CIGRE"); or
- (c) a practice that has been verified by testing, performance history or engineering analysis;

R2.2 the underlying assumptions, design criteria, and methods used to determine the **equipment ratings** identified in requirement R2.1, including identification of how each of the following were considered:

- (a) **equipment rating** standard(s) used in development of this method;
- (b) ratings provided by equipment manufacturers or obtained from equipment manufacturer specifications;
- (c) ambient conditions (for particular or average conditions or as they vary in real time);
- (d) operating limitations; and
- (e) both summer and winter season operations, where summer is defined as May 1st at 12:01 AM Mountain Time to October 31st at 12:00 midnight Mountain Time and winter is defined as November 1st at 12:01 AM Mountain Time to April 30th at 12:00 midnight Mountain Time;

R2.3 a statement that a **facility rating** must not exceed the most limiting applicable **equipment rating** of the individual equipment that comprises that facility;

R2.4 the process by which the **equipment ratings** of the equipment that comprises a facility are determined, where:

¹ The specified penalty amount is conditional on the completion of the accepted mitigation plan.

R2.4.1 the scope of equipment that comprises the facility, addressed in accordance with requirement R2.4 must include (based on equipment ownership), but not be limited to, conductors, transformers, relay protective devices, terminal equipment, and series and shunt compensation devices; and

R2.4.2 the scope of **equipment ratings** addressed in accordance with requirement R2.4 must include, as a minimum, both **normal ratings** and **emergency ratings**, such that:

R2.4.2.1 the **emergency ratings** for equipment comprising power transformers must be specified for a 30 minute duration and the next 3.5 hour duration; and

R2.4.2.2 the **emergency ratings** for transmission lines must be specified for a ten (10) minute duration.

2) From January 1, 2020 until the applicable mitigation plan activities are completed, Western Sustainable Power Inc. is in contravention of R6 as follows:

- A facility rating was not identified for transmission facilities connecting to one aggregated generating facility; and
- There was no evidence to demonstrate the following:
 - implementation of the principle that the facility ratings do not exceed the most limiting applicable equipment rating of the individual equipment that comprises that facility for four of its aggregated generating facilities;
 - that the aggregated generating facility ratings considered the protective relaying for all applicable aggregated generating facilities and conductor/busses at two of the aggregated generating facilities; and
 - that the manufacturer information was used to determine equipment ratings for protective relays located at the aggregated generating facilities.

FAC-008-AB-3 R6 states, in part:

R6 Each **legal owner** of a **transmission facility**, **legal owner** of a **generating unit** and **legal owner** of an **aggregated generating facility** must have **facility ratings** for its facilities that are consistent with:

- (a) the **facility ratings** methodology in accordance with requirements R2 or R3, for a **transmission facility**, a **generating unit** and an **aggregated generating facility**; and
- (b) the documentation in accordance with requirement R1, for a **generating unit** and an **aggregated generating facility**.

MR6 Evidence of having **facility ratings** that are consistent with the **facility ratings** methodology in accordance with requirements R2 and R3, and the documentation in accordance with requirement R1 exists.

FINDINGS

Based upon the information obtained by the MSA, the MSA is satisfied that the event was a contravention of Reliability Standard FAC-008-AB-3, requirement R2 and R6.

MATERIAL FACTS

The material facts relied upon by the MSA include the following:

1. Referral from the AESO to the MSA dated December 4, 2020, including the AESO Alberta Reliability Standards Compliance Monitoring Audit Report regarding the AESO Q3-2020 Compliance Monitoring Audit of Western Sustainable Power Inc.
2. Mitigation plan submitted by Western Sustainable Power Inc. to the MSA dated March 12, 2021.
3. Revised mitigation plan submitted by Western Sustainable Power Inc. to the MSA dated March 19, 2021.

DELIVERY OF PAYMENT

Payment by cheque or certified funds is to be made payable to the "General Revenue Fund c/o Minister of Finance", and delivered to Alberta Energy at: 9945 – 108 Street NW, Edmonton, Alberta, T5K 2G6. The payment should reference this Notice of Specified Penalty and related MSA File #. Electronic copies of the payment and confirmation of delivery should be sent by email to compliance@albertamsa.ca and enforcement@auc.ab.ca. Questions can be directed to compliance@albertamsa.ca.

NOTICE

The Market Surveillance Administrator (MSA) is granted the power and authority under s. 52 of the *Alberta Utilities Commission Act* to issue a Notice of Specified Penalty where the MSA is satisfied that a person has contravened a reliability standard. Specified penalties are set out in AUC Rule 027.

In accordance with the relevant enactments and rules, a dispute regarding the issuance of a Notice of Specified Penalty or failure to pay the specified penalty in accordance with this notice will result in a hearing or other proceeding before the AUC.

In accordance with s. 5(1) of AUC Rule 027 this Notice of Specified Penalty will be made public no earlier than receipt of confirmation of payment from the Commission and no later than 45 days after issuance. The MSA will, if applicable, also post on its website the link to any decision of the AUC respecting the specified penalty.

If your organization disputes the issuance of this Notice of Specified Penalty, or if you have any other questions or comments regarding this matter, please contact the MSA compliance team at compliance@albertamsa.ca.

SIGNATURE

Signature	"Original Signed"	Signature Date	March 29, 2021
Name	Andrew Wilkins	Title	Director, Compliance