

## REFRAMING DATA CENTRES FOR GRID STABILITY: ALBERTA'S TCDC FRAMEWORK AND ENGINEERING IMPLICATIONS



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## Abbreviation

Acronym	Full Form
AGC	Automatic Generation Control
BESS	Battery Energy Storage System
DG	Diesel Generator
EMS	Energy Management System
ESG	Environmental, Social, and Governance
HVAC	Heating, Ventilation, and Air Conditioning
ICE	Internal Combustion Engine
IEC	International Electrotechnical Commission
IP	Internet Protocol
ISO	International Organization for Standardization
IT	Information Technology
KPI	Key Performance Indicator
MG Project	Microgrid Project
PCS	Power Conversion System
PPC	Power Plant Controller
PQ	Power Quality
PQM	Power Quality Meter
PUE	Power Usage Effectiveness
PV	Photovoltaic (Solar)
Q(V)	Reactive Power vs. Voltage Droop Control
RBAC	Role-Based Access Control
RE	Renewable Energy
SCADA	Supervisory Control and Data Acquisition
SCSADA	Secure SCADA (Contextual term; ensure this is not a typo)
SGA	Smart Grid Analytics
SLA	Service Level Agreement
SOC	State of Charge
TCP/IP	Transmission Control Protocol / Internet Protocol
Tier III	Uptime Institute Tier III Data Centre (Concurrent Maintainability)

Tier IV	Uptime Institute Tier IV Data Centre (Fault Tolerant)
UPS	Uninterruptible Power Supply
VSG	Virtual Synchronous Generator

## 1. INTRODUCTION

The exponential growth of digital infrastructure has transformed data centres from ancillary IT facilities into critical nodes of the modern economy. Artificial intelligence (AI) training clusters, cloud computing, and high-frequency data analytics have escalated energy demand in both scale and volatility. Once considered passive, predictable loads, data centres today represent hundreds of megawatts of programmable demand, capable of ramping faster than many generation resources. This transformation compels power system operators to reassess how such loads are integrated into the grid.

Alberta provides a particularly striking case. The Alberta Interconnected Electric System (AIES) reached a historical winter peak of approximately 12,384 MW in January 2024 (AESO, 2025a). In parallel, the Alberta Electric System Operator (AESO) has received 29 separate data centre connection applications, requesting over 16,000 MW of demand transmission service (DTS) (Bennett Jones, 2025). The scale of these requests eclipses Alberta's current system peak, posing unprecedented challenges for grid planning and operations. Unlike larger systems such as ERCOT (~100 GW summer peak) or PJM (>160 GW), Alberta operates a relatively small, islanded grid with limited inerties: a single 500 kV AC interconnection with British Columbia and smaller cross-border links with Saskatchewan and Montana. The sudden tripping of a 500 MW hyperscale data centre in Alberta would equate to ~4% of provincial load—a disturbance of system-wide significance.

Against this backdrop, AESO has begun to fundamentally reframe how it categorizes and governs hyperscale data centres. No longer treated simply as “loads,” transmission-connected data centres (TCDCs) are now expected to behave as grid actors, bearing obligations historically imposed on generation or inverter-based resources (IBRs). The Connection Requirements for Transmission-Connected Data Centres (TCDC), released in draft form in August 2025, signal a paradigm shift: hyperscale computing facilities must provide ramp rate control, fault ride-through, reactive power support, harmonic mitigation, telemetry, and load shedding on command (AESO, 2025b). This regulatory evolution is rooted in both continental guidance—such as the North American Electric Reliability Corporation (NERC) Large Load Task Force findings on the risks of emerging large loads (NERC, 2023)—and the specific reliability realities of the AIES.

This paper investigates the trajectory and implications of these developments. It begins by situating Alberta's response within the broader history of large-load regulation, then analyses the detailed technical requirements AESO is imposing through the TCDC framework. It further examines the design and operational adaptations required by data centre operators, the engineering study requirements (including the role of simulation tools such as PSS®E and PSCAD), and the barriers posed by knowledge gaps between IT developers and power system engineers. Comparative experiences from other jurisdictions are explored to highlight transferable lessons. Finally, the paper positions Smart Grid Analytics (SGA) as a critical enabler of compliance and performance, leveraging its expertise in energy management systems (EMS), power conversion systems (PCS), and grid studies to support data centre operators in meeting these obligations.

### Objectives of the paper:

1. To review the regulatory and historical context of AESO's evolving approach to large loads.
2. To detail the technical requirements imposed under the draft TCDC standard.
3. To evaluate the design and operational implications for hyperscale data centres.
4. To underscore the importance of power system analytical studies (PSS®E, PSCAD, EMT models).
5. To highlight challenges and barriers in bridging IT-centric and grid-centric perspectives.
6. To demonstrate how Smart Grid Analytics' methodologies and prior deployments (e.g., the MG Project in Saudi Arabia) provide a robust pathway for compliance and optimization.

By integrating regulatory analysis, engineering practice, and applied case studies, the paper offers both academic and professional insights into the future of grid-interactive data centres in Alberta and beyond.

## 2. REGULATORY & HISTORICAL BACKGROUND

### 2.1 Alberta's Grid and AESO's Mandate

The Alberta Electric System Operator (AESO) is tasked under provincial statute with ensuring the reliable and economic operation of the Alberta Interconnected Electric System (AIES). Alberta's grid is comparatively small and weakly interconnected, with a winter peak of ~12,400 MW in 2024 and limited interties to British Columbia, Saskatchewan, and Montana (AESO, 2025a). Such a profile amplifies the risks associated with the sudden loss or rapid ramping of large loads. Unlike PJM or ERCOT, where a 500 MW disturbance is noise in the system, the same magnitude in Alberta equates to several percentage points of provincial demand.

Data centres, as AESO notes, exhibit “unique and complex behavior” as non-conforming loads, including:

- Steep ramp rates, sometimes exceeding 100 MW in seconds;
- High reliance on power electronic interfaces (UPS, rectifiers, PCS);
- Sensitivity to voltage and frequency deviations;
- The potential for mass tripping during faults (AESO, 2025b).

Such characteristics require a tailored regulatory response to safeguard the reliability of the AIES.

### 2.2 Surge in Large Load and Data Centre Applications

Between 2024 and 2025, AESO received 29 transmission-connected data centre applications representing more than 16,000 MW of demand transmission service (DTS) requests (Bennett Jones, 2025). For comparison, this cumulative request exceeds Alberta's system peak demand by over 25%.

The unprecedented scale and speed of such requests created two immediate risks:

1. Planning risk — inability to reinforce the grid quickly enough to accommodate all requests;
2. Operational risk — large hyperscale loads tripping or ramping uncontrollably could destabilize provincial frequency and voltage.

AESO concluded that traditional “first-come, first-served” connection policies were insufficient for this emerging class of load.

### 2.3 Interim Large Load Integration Framework (Phase I, 2025)

To manage near-term reliability exposure, AESO announced its Interim Approach to Large Load Connections in June 2025. The key features included:

- Threshold: Applies to loads  $\geq 75$  MW at a single site.
- Aggregate Cap: A maximum of 1,200 MW of DTS capacity will be assigned for projects with in-service dates between 2027 and 2028 (AESO, 2025a).
- Qualification Criteria: Projects must:

- Demonstrate advanced progress in AESO's connection process;
- Provide municipal support, zoning, and permitting approvals;
- Post financial security for connection obligations;
- Show via system studies that no major reinforcements are required for connection.
- Allocation: The 1,200 MW is distributed pro rata among qualified applicants, proportional to their requested load. Any unallocated capacity due to project withdrawals is redistributed.

This interim step effectively rationed scarce DTS capacity while AESO developed a long-term technical framework.

## 2.4 Draft Transmission-Connected Data Centre (TCDC) Requirements

In August 2025, AESO published the draft Connection Requirements for Transmission-Connected Data Centres (TCDC), with stakeholder consultation running from August 25 to September 19, 2025 (AESO, 2025b). The TCDC framework aims to codify the technical and operational obligations of data centres at the transmission level, including:

- Active power ramp limits ( $\leq 10$  MW/min);
- Fault ride-through (voltage sags to 45% for 0.15 s; frequency down to 57 Hz for ~5 min; RoCoF up to 5 Hz/s);
- Reactive power support ( $\pm 0.95$  PF with sub-second response);
- Oscillation and harmonic limits (variability  $\leq 16$  kW/100 ms; reporting and mitigation of harmonics);
- SCADA and telemetry requirements, including EMT and phasor models validated against disturbance tests;
- Load shedding obligations, with segmentable demand curtailment on command;
- Enhanced visibility ( $\geq 300$  MW requires dual SCADA paths;  $\geq 500$  MW requires physically diverse telecoms).

The TCDC thus reframes data centres as grid actors, required to behave more like inverter-based generators than conventional loads.

## 2.5 Alignment with Continental Reliability Frameworks

AESO's draft TCDC aligns with findings of the North American Electric Reliability Corporation (NERC) Large Loads Task Force (LLTF), which published its white paper Characteristics and Risks of Emerging Large Loads in 2023 (NERC, 2023). The LLTF flagged hyperscale data centres, crypto mining, and electrified industrial processes as emergent risks to bulk system reliability, emphasizing:

- Steep ramp rates and limited visibility;
- Ride-through inadequacies;
- Lack of coordination with planning models;

- Risks of harmonics and oscillations. AESO is among the first system operators to translate these continental concerns into binding regional requirements rather than awaiting NERC's proposed 2026 guideline timeline.

## 2.6 Implementation Timeline

- August 2025: Draft TCDC released for stakeholder comment.
- October 2025: Finalization of TCDC document planned.
- 2026–2027: Codification into ISO Rules and Alberta Reliability Standards.
- 2027–2028: Interim cap (1,200 MW) governs connections; TCDC compliance expected for projects connecting beyond this horizon.

## Summary

Alberta's regulatory evolution reflects the scale and urgency of hyperscale data centre growth. With 29 connection requests exceeding 16,000 MW against a provincial peak of ~12.4 GW, the Alberta Electric System Operator (AESO) recognized that traditional load connection practices were inadequate. In June 2025, AESO introduced an Interim Large Load Integration Framework, capping new demand transmission service (DTS) at 1,200 MW through 2028 and applying allocation rules to projects  $\geq 75$  MW.

Building on this, AESO released its draft Transmission-Connected Data Centre (TCDC) requirements in August 2025, reframing data centres as grid actors with obligations for ramp control, ride-through, reactive support, harmonic mitigation, SCADA/PMU visibility, and load shedding. These obligations mirror standards historically imposed on inverter-based generators, reflecting the destabilizing risk of large load tripping in a small, weakly interconnected system like Alberta's.

The framework also aligns with NERC's Large Loads Task Force (LLTF), which flagged hyperscale loads, crypto mining, and industrial electrification as continental risks. Alberta's early action, ahead of NERC's 2026 guidance, underscores its proactive stance in safeguarding reliability.

In essence, Chapter 2 shows that the TCDC framework is not an isolated policy but a strategic regulatory adaptation—anchored in Alberta's system realities, shaped by global risk awareness, and implemented through a phased transition from interim caps to binding ISO rules by 2027.

### 3. TECHNICAL REQUIREMENTS UNDER TCDC

In August 2025, AESO released the draft Connection Requirements for Transmission-Connected Data Centres (TCDC), a comprehensive set of technical and operational obligations for hyperscale data centres connecting to Alberta's transmission system. Unlike conventional load connection guides, the TCDC rules mirror many of the standards traditionally applied to inverter-based generation resources. This section examines the core technical requirements, their rationale, and their implications for both grid reliability and data centre design.

#### 3.1 Active Power Ramping Requirements

- Requirement: Data centres must limit their active power ramp rates to  $\leq 10$  MW per minute (AESO, 2025b).
- Rationale: AI and high-performance compute clusters can ramp 100–200 MW of power demand within seconds, outpacing most generation response and risking frequency swings. In Alberta's 12.4 GW system, such instantaneous changes represent a destabilizing shock.
- Implications:
- Workload scheduling must be coupled with supervisory ramp limiters.
- UPS/BESS front ends should smooth power intake through firmware-based slope controllers.
- Coordination with IT workload orchestrators (e.g., Kubernetes, VMware) is required to avoid grid-non-compliant demand spikes.

#### 3.2 Fault Ride-Through (FRT) Capability

- Requirement: TCDCs must ride through:
- Voltage sags down to 45% of nominal for at least 0.15 seconds.
- Frequency deviations as low as 57 Hz for up to 5 minutes.
- Rate of Change of Frequency (RoCoF) up to 5 Hz/s.
- Rationale: Conventional industrial loads often trip offline during disturbances. However, the instantaneous loss of hundreds of megawatts is more destabilizing than the disturbance itself. For Alberta, ensuring large loads stay connected is essential to maintaining system inertia and frequency control.
- Implications:
- UPS/BESS must provide buffered support during low voltage events.
- Gensets may only be used as tertiary support; they cannot replace ride-through functions.

- Testing and certification require controlled disturbance simulations (via PSCAD/EMT) and validation against real-world events.

### 3.3 Reactive Power and Voltage Support

- Requirement: TCDCs must maintain a power factor within  $\pm 0.95$ , with sub-second response times to reactive power commands.
- Rationale: Voltage stability in weak grids depends on local reactive support. Passive loads with low or uncontrolled power factor can destabilize system voltage during contingencies.
- Implications:
  - Data centre UPS inverters must operate in VAR control mode, effectively functioning as distributed STATCOMs.
  - Facility electrical design must include dynamic reactive compensation (e.g., PCS-enabled VAR support or standalone STATCOMs).
  - Compliance requires continuous PF telemetry, not just nameplate declarations.

### 3.4 Oscillation and Harmonic Control

- Requirement:
  - Net variability must remain below 16 kW per 100 ms.
  - Forced oscillations in the sub-synchronous band must remain within  $\pm 160$  kW.
  - Harmonic distortion must be measured, reported, and mitigated.
- Rationale: Power electronic loads, such as rectifiers and high-frequency UPS converters, introduce harmonics and can couple into system resonances. Sub-synchronous oscillations can damage transmission equipment and destabilize weak systems.
- Implications:
  - Deployment of active harmonic filters and real-time monitoring of PQ meters.
  - Continuous spectral analysis of load fluctuations, integrated into EMS logic.
  - Periodic submission of harmonic compliance reports to AESO.

### 3.5 SCADA, Telemetry, and Modelling Requirements

- Requirement:
  - Sites  $\geq 300$  MW must maintain dual SCADA communication paths.

- Sites  $\geq 500$  MW must implement physically diverse telecom infrastructure.
- All TCDCs must provide Electromagnetic Transient (EMT) and phasor models, validated against disturbance tests.
- Rationale: Visibility and controllability are non-negotiable for hyperscale loads. Alberta's system operator requires real-time data and validated models to simulate disturbances, much as is done for wind or solar farms.
- Implications:
- Operators must integrate IEC 61850, DNP3, or IEC 60870 protocols with AESO's EMS.
- PMUs with GPS-synchronized phasors must be installed at the point of interconnection.
- Vendors must deliver open, testable EMT models — black-box vendor files are insufficient.

### 3.6 Load Shedding Obligations

- Requirement: Data centres must be capable of shedding defined blocks of load on command.
- Rationale: In contingency events, controlled curtailment is preferable to uncontrolled tripping. Load shedding offers AESO an emergency reserve tool to maintain system balance.
- Implications:
- IT loads must be classified into critical, essential, and non-essential tiers.
- Orchestration systems must support fast workload suspension, migration, or hibernation.
- Electrical design must allow selective tripping of supply feeders by block.

### 3.7 Planning Anchors and System Study Assumptions

- Requirement:
- MSDC (Maximum Single Data Centre) assumed at 200 MW.
- Ramp30 defined as 300 MW over 30 minutes.
- Rationale: These anchors allow AESO to build deterministic scenarios for planning studies and ensure that aggregated data centre behavior remains bounded.
- Implications: Developers must align their project plans with these anchors, even if their intended capacities exceed these thresholds.

### 3.8 Summary of Technical Paradigm Shift

Taken together, the TCDC requirements represent a profound shift: data centres must no longer be treated as passive loads. Instead, they are programmable, grid-interactive resources, required to behave with the same discipline as generators. For developers accustomed to IT reliability paradigms, this means adopting grid-centric thinking, investing in compliant power electronics, and engaging in system studies normally reserved for utilities and renewable developers.

#### Summary

The draft Transmission-Connected Data Centre (TCDC) requirements released by AESO in August 2025 represent a paradigm shift in how large loads are integrated into Alberta's grid. Instead of being treated as passive consumers, hyperscale data centres must now behave like grid-supportive resources.

Key obligations include:

- Ramping limits: Active power intake capped at  $\leq 10$  MW/min, addressing the risk of AI/compute clusters ramping 100+ MW in seconds.
- Fault ride-through: Data centres must survive deep voltage sags, prolonged frequency deviations, and RoCoF up to 5 Hz/s, avoiding mass tripping during disturbances.
- Reactive support: Sites must maintain  $\pm 0.95$  PF with sub-second response, ensuring local voltage stability.
- Oscillation & harmonics control: Net variability is capped at 16 kW/100 ms; harmonics must be measured, reported, and mitigated.
- SCADA/telemetry: Dual-path communications for  $\geq 300$  MW sites, diverse telecoms for  $\geq 500$  MW, and validated EMT and phasor models tied to real disturbance tests.
- Load shedding: Operators must segment demand into controllable blocks for AESO-directed curtailment.
- Planning anchors: Maximum single data centre (MSDC) assumed at 200 MW, with a system planning ramp rate of 300 MW/30 min.

Together, these requirements demand that UPS, PCS, and BESS infrastructures evolve from resilience-only systems into active grid interfaces. They also enforce a proof-based compliance regime, where validated models and disturbance testing replace static declarations.

In summary, Chapter 3 highlights how Alberta's TCDC framework translates system risk factors into specific, enforceable technical obligations, marking the start of a new era where data centres are defined not only by IT reliability but also by grid reliability.

## 4. DESIGN & OPERATIONAL IMPLICATIONS FOR DATA CENTRES

The draft TCDC framework imposes obligations that fundamentally reshape how data centres are designed and operated. For operators accustomed to IT-centric priorities—such as uptime, redundancy, and cooling efficiency—these grid-centric requirements introduce new design variables. Meeting them necessitates a paradigm shift in both electrical architecture and operational philosophy.

### 4.1 Infrastructure Requirements: UPS, BESS, and PCS as Grid Interfaces

Traditionally, data centre electrical infrastructure has been built around uninterruptible power supplies (UPS) and diesel gensets to guarantee uninterrupted IT operations. These assets were optimized for resilience, not for grid support. Under the TCDC rules, however, UPS and battery systems must evolve into active grid-support interfaces: UPS/BESS inverters should provide ramping control, reactive power support, and harmonic mitigation; PCS (power conversion systems) must act as controllable intermediaries, enabling fast frequency response and ride-through capability; and diesel gensets are relegated to tertiary, emergency-only roles (AESO, 2025b). This trajectory mirrors the evolution seen in distributed renewable integration, where PCS functionality turned previously passive plants into active grid participants.

### 4.2 IT-Centric vs. Grid-Centric Design Priorities

The divergence between IT and power engineering cultures presents one of the greatest integration challenges. The IT viewpoint treats power as an assumed commodity and prioritizes redundancy and uptime; the grid viewpoint treats each megawatt as part of a system balance that must be predictable and controllable (AESO, 2025a; NERC, 2023). Bridging this gap requires embedding power systems expertise early in the data centre project lifecycle.

### 4.3 Integration with EMS and SCADA

Compliance with AESO's telemetry, ramping, and load-shedding requirements necessitates deploying an Energy Management System (EMS) tightly integrated with SCADA and power-electronics control layers. Required capabilities include real-time monitoring of active/reactive power and harmonics, supervisory enforcement of ramp limits, orchestration of selective load shedding, PMU integration at the point of interconnection for synchronized phasor data, and adherence to OT cybersecurity frameworks (e.g., IEC 62443) for protected command/telemetry channels (AESO, 2025b; IEC, 2018). These functions cover both the operational control plane and the audit trail AESO will require for compliance.

### 4.4 Load Management at the IT Layer

AESO's demand for controllable load shedding forces a direct mapping between IT workloads and power blocks. Workloads must be classified (critical, essential, non-essential), and orchestration platforms (Kubernetes, virtualization managers, job schedulers) must support fast suspension, live migration, or graceful

checkpointing to meet shedding windows without data corruption or SLA breach. This is a substantive architectural change that couples application design to electrical contingencies.

#### 4.5 Vendor and Supply Chain Maturity

While many UPS vendors have added performance and monitoring features, not all products today ship with validated grid-support functionality (fast VAR response, ramp limiters, low-latency telemetry, or open EMT models). Meeting TCDC timelines will therefore require vendors to deliver firmware, model documentation, and factory/system testing packages comparable to those supplied for renewable generation plants (AESO, 2025b). The procurement spec must thus demand vendor support for grid-compliant modes and verified modelling artefacts.

#### 4.6 Lessons from Microgrid Deployments (MG Project, Saudi Arabia)

Smart Grid Analytics' MG Project demonstrates that the technical building blocks for grid-interactive behaviour already exist. The MG Project implemented an EMS that coordinated PV, BESS, ICE gensets and PCS to deliver day-ahead scheduling, multi-mode power flow control (grid-connected, islanded, black-start), fast frequency response, SOC-aware dispatching, and prioritized load shedding — all validated during commissioning and operational tests (K. M., 2025). The MG architecture maps closely to the capabilities required by AESO: replace renewable variability with controllable IT load profiles, and reuse the EMS/PCS/BESS orchestration for ramp management, ride-through, and selective shedding. The key difference is that data centre projects must additionally integrate with IT workload orchestration and must provide AESO-grade EMT/PMU models (K. M., 2025).

#### 4.7 Operational Readiness and Testing

TCDC requires demonstrable proof, not simply design statements. Factory acceptance tests (FATs) must include grid-simulation scenarios; on-site commissioning must demonstrate fault ride-through and ramp compliance; EMT and PMU traces are required to validate vendor models; and periodic revalidation is expected after firmware or topology changes (AESO, 2025b). Operational readiness therefore becomes an ongoing engineering discipline within data centre operations.

### Summary

AESO's TCDC rules push data centres to evolve from passive consumers into active, grid-supportive actors. This requires redesigned electrical stacks (UPS/BESS/PCS as grid interfaces), EMS/SCADA integration with cybersecurity rigor, coordinated IT workload management for shedding, vendor commitments to grid features and validated models, and a structured test/validation program. The MG Project demonstrates feasibility and provides a template for adaptation, but widespread deployment in Alberta will require deliberate procurement, engineering, and organizational changes to bridge the IT–power gap (K. M., 2025).

## 5. ENGINEERING STUDIES & ANALYTICAL REQUIREMENTS

Large, transmission-connected data centres are no longer passive, predictable loads. Their integration into Alberta's power system requires the same depth of analytical rigor as is applied to generation projects. The AESO TCDC rules explicitly mandate validated dynamic models, disturbance testing, and system-level analysis. This chapter outlines the essential engineering studies, the simulation tools required, and the knowledge gaps that must be addressed.

### 5.1 The Role of Power System Studies in Data Centre Integration

Every transmission-connected resource—whether generation or load—alters system stability. For hyperscale data centres, the risks include:

- Frequency instability from sudden step changes in load;
- Voltage instability from lagging power factor or insufficient reactive support;
- Harmonic resonance introduced by UPS and rectifier front ends;
- Sub-synchronous interactions between converter-based loads and weak transmission corridors.

System studies quantify these risks, test compliance against AESO's thresholds, and inform corrective measures such as ramp limiters, harmonic filters, or feeder segmentation.

### 5.2 Steady-State, Dynamic, and Stability Analysis in PSS®E

PSS®E (Power System Simulator for Engineering) is the industry-standard platform for bulk system planning studies. For data centre projects, key applications include:

- Load flow studies: Assessing the impact of adding 100–500 MW demand at specific substations.
- Contingency analysis: Testing N-1 and N-2 transmission outages with the data centre in service.
- Dynamic simulations: Evaluating ride-through capability and ramp compliance under frequency events.
- Voltage stability studies: Determining reactive support needs and VAR controller setpoints.

In Alberta, PSS®E studies will form the baseline for connection approval, ensuring that each site complies with MSDC and Ramp30 anchors.

### 5.3 Electromagnetic Transient Studies in PSCAD

Whereas PSS®E addresses long-term dynamics, PSCAD/EMTDC is required to capture fast transient interactions of converter-based systems. For TCDCs, PSCAD studies are mandatory to:

- Validate fault ride-through behavior of UPS/BESS inverters under voltage sags and RoCoF events.
- Analyze harmonic distortion and confirm compliance with AESO's oscillation restrictions.
- Simulate converter-control interactions with the weak AIES grid, preventing resonance or instability.
- Benchmark vendor-provided EMT models against laboratory or field disturbance tests.

These studies are not optional—AESO requires validated EMT models as part of the TCDC compliance package.

#### 5.4 EMT and Phasor Model Validation

The draft TCDC framework explicitly mandates “models validated against real disturbance tests” (AESO, 2025b). This reflects an industry-wide shift from paper-based assumptions to proof-based compliance. Validation requires:

- Vendor EMT models of UPS, PCS, and BESS systems, with open parameters for control tuning.
- Phasor models (PSSE-compatible) for bulk system analysis, calibrated against EMT simulations.
- Disturbance playback tests, where recorded voltage/frequency sags are replayed into the system and compared to model predictions.

This approach eliminates the historic problem of “black-box” vendor files that cannot be independently verified.

#### 5.5 Knowledge Gaps: IT Developers vs. Power Engineers

Most hyperscale data centre developers originate from the IT and cloud infrastructure sector, not the power systems field. This creates several pitfalls:

- Underestimating grid studies: IT-centric teams often view power as a commodity input and fail to budget time and resources for detailed PSS®E and PSCAD studies.
- Vendor dependency: Developers may accept black-box UPS vendor assurances without demanding validated models.
- Incomplete compliance mindset: IT operators assume resilience = compliance, overlooking that AESO's requirements are system-centric, not facility-centric.
- Lack of interdisciplinary integration: Software orchestration and electrical load shedding are rarely coordinated in standard data centre operations.

Bridging these gaps requires early involvement of power system consultants and continuous collaboration between IT and electrical engineering teams.

## 5.6 Pitfalls in Engineering Studies

Based on both AESO guidance and international case studies, the following pitfalls are particularly common:

- Ignoring harmonics: Assuming UPS filters are sufficient without full-spectrum harmonic analysis.
- Simplified load models: Using static ZIP models instead of validated dynamic EMT models.
- Overlooking ramp aggregation: Modelling only average demand rather than peak workload bursts.
- Delayed testing: Attempting EMT validation only during commissioning, leaving no margin for corrective redesign.

Avoiding these pitfalls is critical for achieving connection approval and operational stability.

## 5.7 The Analytical Burden and Opportunity

The analytical rigor demanded by AESO—PSS®E, PSCAD, EMT validation, harmonic reporting—is not merely a regulatory hurdle. It represents an opportunity:

- To position data centres as programmable, dispatchable demand resources.
- To extract value from predictive analytics that optimize workload scheduling within grid limits.
- To elevate compliance studies into ongoing digital twin frameworks, enabling predictive maintenance and real-time stability monitoring.

## Summary

Engineering studies are the linchpin of TCDC compliance. PSS®E and PSCAD together provide the full spectrum of analysis required: from steady-state and dynamic stability to fast electromagnetic transients and harmonics. AESO's insistence on validated models represents a paradigm shift from assumption-based planning to disturbance-proven integration. For data centre developers, especially those with IT backgrounds, this imposes a steep learning curve but also creates a pathway for collaboration with grid-focused solution providers.

## 6. CHALLENGES & BARRIERS

While Alberta's draft TCDC framework is technically sound and aligned with continental reliability priorities, its practical implementation poses significant challenges. These barriers arise from technical feasibility, supply chain maturity, cultural divides between IT and power engineering, and institutional constraints.

### 6.1 Technical Feasibility vs. Cost Trade-offs

Many of the TCDC requirements demand grid-supportive UPS, PCS, and BESS architectures, which exceed the design scope of traditional data centre electrical systems. Meeting these standards introduces cost and complexity:

- Reactive support and harmonics: PCS with dynamic VAR and harmonic control are more expensive than standard UPS/rectifier systems.
- EMT model provision: Vendors often charge premiums for open, validated models, and smaller OEMs may not offer them at all.
- Ramp rate compliance: Limiting AI cluster ramping requires tight coupling between workload orchestration and PCS dispatch—adding both control logic and integration effort.

Operators must balance these costs against project timelines and business cases that often prioritize rapid deployment.

### 6.2 Vendor Readiness and Technology Gaps

The vendor ecosystem is not uniformly prepared for TCDC compliance. While renewable inverter suppliers (e.g., PCS providers for solar/wind farms) have years of experience with grid-code compliance, the UPS industry has not faced equivalent demands. Challenges include:

- Lack of firmware functionality for fast reactive support.
- Limited harmonic measurement and reporting capabilities in standard UPS systems.
- Reluctance to provide open EMT models due to intellectual property concerns.
- Fragmented supply chains: PCS, EMS, UPS, and IT orchestrators come from different vendors, with limited interoperability.

This immaturity could create bottlenecks for early Alberta projects.

### 6.3 Knowledge and Skill Gaps between IT and Power Engineering

Perhaps the most critical barrier is cultural. Data centre developers and operators are predominantly IT-centric, focusing on Tier-IV reliability, redundancy, and software orchestration. By contrast, AESO's requirements are rooted in grid dynamics and power system stability. This mismatch produces several risks:

- Misaligned priorities: IT teams may undervalue harmonic studies or RoCoF withstand until flagged by AESO.
- Compliance blind spots: IT-centric operators may assume reliability = compliance, neglecting requirements like load shedding on command or validated EMT models.
- Integration gaps: IT orchestrators (e.g., Kubernetes, cloud schedulers) rarely expose APIs for grid-driven workload curtailment, requiring custom engineering.

Bridging this divide requires early engagement of power engineers, structured cross-domain workshops, and governance mechanisms that place compliance at equal footing with IT SLAs.

### 6.4 Institutional Coordination and Governance

Compliance with TCDC rules involves coordination across multiple layers:

- AESO: Responsible for setting and enforcing technical standards.
- Transmission facility owners (TFOs): Must plan substation reinforcements and ensure telemetry integration.
- Data centre operators: Must procure compliant equipment and integrate IT + electrical operations.
- Vendors: Must deliver validated models, firmware updates, and test documentation.

Institutional silos and misaligned incentives can delay compliance. For instance, TFOs may be unwilling to proceed with reinforcements until operators provide validated models, while operators may hesitate to invest without guaranteed DTS allocation.

### 6.5 Regulatory Uncertainty and Risk to Timelines

Although AESO has outlined a draft timeline (final TCDC rules by October 2025, ISO rulemaking in 2026–27), uncertainties remain:

- Evolving requirements: Stakeholder feedback may alter ramping or FRT thresholds.
- Overlap with NERC: Future continental guidelines (2026+) may impose additional obligations.
- Project pipeline: With a 1,200 MW cap through 2028, many applicants face uncertain connection timelines.

This uncertainty complicates procurement strategies, financing, and site development, as equipment and designs may require revision to meet future compliance standards.

## 6.6 Operational Readiness and Ongoing Compliance

AESO's "proof, not paper" mandate implies continuous compliance validation:

- Disturbance revalidation after firmware updates.
- Periodic submission of harmonic and ramp compliance data.
- SCADA and PMU availability with dual-path redundancy.

For operators used to static commissioning certificates, this creates an operational burden requiring dedicated compliance teams and toolchains.

## Summary

The draft TCDC rules reflect Alberta's unique system realities and align with continental best practices, but their implementation is constrained by cost, vendor readiness, IT–power knowledge divides, institutional silos, and regulatory uncertainty. Overcoming these challenges requires proactive planning, cross-disciplinary collaboration, and early adoption of grid-compliant designs. Without these measures, Alberta risks project delays, stranded investments, and reliability exposure.

## 7. COMPARATIVE JURISDICTIONS & CASE STUDIES

Alberta is not alone in grappling with the reliability implications of hyperscale data centres and other large, programmable loads. Several jurisdictions have already introduced grid code modifications or operational frameworks to address similar risks. This chapter compares Alberta's draft TCDC requirements with international precedents, highlighting both transferable lessons and contextual differences.

### 7.1 Ireland: Data Centre Dominance in a Small Grid

Ireland offers the closest parallel to Alberta. The EirGrid system is a relatively small island grid (~5–6 GW peak demand), yet by 2023, data centres already consumed more than 18% of national electricity demand (EirGrid, 2023). EirGrid and the Commission for Regulation of Utilities (CRU) responded by:

- Introducing connection moratoria in the Dublin area where grid capacity was saturated.
- Mandating on-site generation and storage for new data centres to reduce system reliance.
- Enforcing grid-code compliance for UPS/BESS, requiring fast frequency response and reactive support.

Like Alberta, Ireland recognized that large data centres could destabilize a relatively weak system. The key lesson is that strict technical compliance must be paired with location-based planning restrictions when aggregate penetration becomes high.

### 7.2 United Kingdom: Grid Services from Data Centres

In the UK, the National Grid ESO has framed data centres not only as risks but also as potential grid service providers. Some operators now participate in:

- Fast Frequency Response (FFR): Leveraging UPS/BESS to inject or absorb power within 1 second.
- Dynamic Containment (DC): Providing sub-second stability services to counteract renewable variability.
- Demand turn-down programmes: Shedding compute workloads during peak system stress.

The UK demonstrates that once compliant infrastructure is in place, data centres can transition from grid liabilities to active balancing resources. This perspective aligns with AESO's ambition to treat TCDCs as "grid actors."

### 7.3 ERCOT: Scale as a Natural Buffer

The Electric Reliability Council of Texas (ERCOT) operates a much larger system (~100 GW summer peak). In ERCOT, the sudden trip of a 500 MW data centre represents ~0.5% of peak demand — a tolerable event compared to Alberta's ~4%. As such, ERCOT has not imposed Alberta-level ramping or FRT requirements on loads. Instead, ERCOT's focus has been:

- Visibility: Requiring telemetry from large flexible loads (LFLs), including crypto mines and data centres.
- Market participation: Allowing large loads to enroll in ancillary services markets as controllable demand.

The key lesson is that system scale dictates regulatory strictness. Alberta's rules are more stringent precisely because its grid cannot absorb large disturbances without destabilization.

### 7.4 PJM: Flexible Load Integration in a Capacity Market

The PJM Interconnection (>160 GW peak demand) also benefits from scale, but its capacity market structure has incentivized load flexibility:

- Data centres and industrial loads can bid into demand response programs, committing to reduce load during system peaks.
- PJM has not imposed stringent technical requirements on data centre UPS systems, as its broad resource mix provides inherent stability margins.

This contrasts sharply with Alberta, which lacks both a capacity market and surplus inerties.

### 7.5 Nordics: Grid-Compliant UPS and Fast Frequency Response

In Finland, Sweden, and Denmark, several hyperscale data centres (e.g., in Luleå and Helsinki) have integrated grid-supportive UPS systems that participate in fast frequency response (FFR) markets. These UPS systems:

- Provide dynamic reactive support within 100 ms.
- Offer frequency containment reserves by modulating demand or discharging stored energy.
- Are validated with EMT models similar to AESO's requirements.

The Nordic case demonstrates the feasibility of UPS-as-grid-assets, proving that AESO's demands, while challenging, are technically achievable.

## 7.6 Synthesis of Comparative Lessons

- Ireland: Small grids cannot absorb large data centre growth without strict compliance and locational caps.
- UK: Data centres can evolve into grid service providers if compliance infrastructure is in place.
- ERCOT/PJM: Larger systems face less immediate risk, explaining their lighter regulatory approach.
- Nordics: Demonstrate mature integration of UPS/BESS into ancillary service markets.

For Alberta, the lesson is clear: the TCDC framework must be stringent by necessity, but it also opens a pathway for data centres to contribute actively to system stability once compliance is achieved.

## Summary

Alberta's regulatory approach is not unprecedented but represents a regional adaptation of global lessons. Where larger systems can tolerate disturbances through sheer scale, Alberta—like Ireland—must impose strict technical requirements. The UK and Nordics provide a forward-looking model where compliant data centres transition from reliability risks to grid resources, a trajectory Alberta may pursue as technical maturity and market structures evolve.

## 8. SMART GRID ANALYTICS: ENABLING COMPLIANCE AND OPTIMAL PERFORMANCE

Meeting the Alberta Electric System Operator's (AESO) Transmission-Connected Data Centre (TCDC) requirements is not simply a matter of equipment procurement. It requires integrated system engineering, validated modelling, and ongoing operational analytics. Data centre developers, whose strengths lie in IT architecture and cloud operations, often lack the grid-engineering expertise to deliver compliance independently. This is where specialized partners such as Smart Grid Analytics (SGA) provide essential value.

### 8.1 Background and Expertise of Smart Grid Analytics

Smart Grid Analytics has a proven track record in deploying energy management systems (EMS), power conversion systems (PCS), and battery energy storage systems (BESS) across large-scale projects. Experience spans grid-connected microgrids, renewable integration, and hybrid power systems in diverse geographies. Key competencies include:

- Grid integration studies: Load flow, dynamic stability, and contingency analysis using PSS®E.
- Electromagnetic transient modelling: PSCAD-based validation of PCS, UPS, and BESS behaviour under faults and oscillations.
- Digital twins: Real-time data fusion with validated models to track state of charge (SoC), state of health (SoH), ramp compliance, and harmonic profiles.
- Control architectures: EMS logic for ramp limitation, ride-through orchestration, reactive power dispatch, and prioritized load shedding.

These capabilities map directly onto the obligations AESO has placed on data centres.

### 8.2 From Grid Codes to Engineering Execution

AESO's TCDC requirements—ramp limits, fault ride-through, harmonic reporting, and SCADA visibility—are written in regulatory language. Translating these into operational reality requires:

- Model development: Vendor UPS/PCS EMT models parameterized for AESO test cases.
- Simulation campaigns: Validating ramp and ride-through performance in PSS®E and PSCAD before commissioning.
- System integration: Embedding EMS logic into IT workload orchestration, ensuring grid-driven shedding maps to application tiers.
- Commissioning validation: Executing disturbance playback and verifying compliance against AESO thresholds.

Smart Grid Analytics specializes in bridging this translation layer, reducing compliance risk and shortening project timelines.

### 8.3 Case Example: Microgrid Deployment as Proof of Readiness

In the MG Project (Saudi Arabia, 2023–24), SGA deployed a multi-mode EMS integrating PCS, BESS, and SCADA to:

- Smooth renewable ramping.
- Provide sub-second fast frequency response.
- Execute prioritized load shedding by feeder block.
- Deliver validated EMT and phasor models, tested against on-site disturbances.

This project demonstrates that the technical building blocks required by AESO are not theoretical—they have already been deployed in comparable large-scale systems. The same architecture can be applied to data centres by substituting renewable variability with IT workload dynamics.

### 8.4 Predictive and Prescriptive Analytics

Beyond compliance, Smart Grid Analytics offers advanced analytics capabilities that convert compliance into operational advantage:

- Predictive analytics: Forecasting ramping profiles based on AI workload scheduling.
- Harmonic monitoring: Continuous spectral analysis with early warning of resonance risks.
- Prescriptive analytics: Recommending workload migration or UPS/PCS setpoint adjustments to optimize both compliance and efficiency.
- Digital twin integration: Continuous validation of models against SCADA and PMU data, ensuring compliance proof is always audit-ready.

### 8.5 Bridging Knowledge Gaps for IT-Centric Developers

Most hyperscale developers lack in-house expertise with PSS®E, PSCAD, or EMT validation. Common pitfalls include over-reliance on vendor assurances, late-stage discovery of compliance gaps, and absence of IT–power integration frameworks. Smart Grid Analytics mitigates these risks by:

- Conducting early-stage feasibility and interconnection studies.
- Advising on procurement specifications for UPS/PCS/BESS with open model requirements.
- Providing cross-domain workshops between IT and grid engineering teams.

- Delivering compliance roadmaps that align IT design cycles with AESO's regulatory milestones.

## 8.6 Value Proposition for Alberta's Data Centres

By combining regulatory insight, modelling expertise, EMS/PCS deployment experience, and advanced analytics, Smart Grid Analytics offers a full-spectrum solution:

- For AESO: Confidence that connected data centres behave predictably, support stability, and provide validated models.
- For operators: Reduced compliance risk, shorter time-to-grid, and operational intelligence that extends beyond minimum requirements.
- For vendors: A structured integration partner capable of validating products against AESO standards.

## Summary

The AESO TCDC framework is reshaping the definition of data centres, elevating them from passive loads to active grid actors. Achieving compliance requires more than equipment—it requires simulation, integration, validation, and continuous analytics. Smart Grid Analytics is uniquely positioned to enable this transition, leveraging field-proven EMS/PCS/BESS deployments, PSS®E and PSCAD modelling expertise, and digital twin analytics. In doing so, SGA not only ensures compliance but also positions data centres as reliable, responsive participants in Alberta's grid of the future.

## 9. CONCLUSION & RECOMMENDATIONS

The rise of hyperscale data centres represents both an economic opportunity and a reliability challenge. In Alberta, where the provincial grid is relatively small, weakly interconnected, and highly sensitive to large load events, the arrival of multiple 100–500 MW data centre projects has forced a rethinking of regulatory paradigms. AESO's draft Transmission-Connected Data Centre (TCDC) requirements are among the most stringent in North America, reframing data centres as grid actors rather than passive consumers.

This paper has traced the historical and regulatory evolution behind the TCDC framework, analyzed the technical requirements, explored design and operational implications, outlined the engineering study mandates, and identified barriers and international precedents. It has also shown how Smart Grid Analytics (SGA), with its experience in EMS/PCS/BESS deployments and grid studies, is positioned to enable compliance and unlock value for both operators and the grid.

### 9.1 Recap of AESO's Regulatory Shift

- Problem driver: 29 hyperscale applications totalling >16,000 MW, dwarfing Alberta's ~12.4 GW peak.
- Interim action: 1,200 MW DTS cap with allocation rules to manage immediate pipeline risk.
- Long-term solution: Draft TCDC rules mandating ramp limits, ride-through, reactive support, harmonics control, SCADA/PMU telemetry, and validated EMT/phaser models.
- Paradigm shift: Loads treated as active participants in system stability, with obligations comparable to generators.

### 9.2 Summary of Technical and Operational Requirements

The TCDC framework demands:

- Active power ramping control:  $\leq 10$  MW/min.
- Ride-through capability: Voltage dips (45% for 0.15 s), frequency swings (57 Hz for 5 min), RoCoF (5 Hz/s).
- Reactive support:  $\pm 0.95$  PF with sub-second response.
- Oscillation/harmonic limits: Variability  $\leq 16$  kW/100 ms; harmonics measured and mitigated.
- SCADA/Telemetry: Dual-path communications, PMUs, validated EMT/phaser models.
- Load shedding: Tiered curtailment blocks on command.
- Planning anchors: MSDC = 200 MW, Ramp30 = 300 MW/30 min.

In short, compliance requires grid-supportive power electronics, EMS/SCADA integration, validated system studies, and workload-aware operational strategies.

### 9.3 Recommendations for Data Centre Operators

1. Engage early with AESO and TFOs to clarify DTS allocation, compliance timelines, and modelling obligations.
2. Budget for PSS@E and PSCAD studies as core project milestones, not optional add-ons.
3. Demand open EMT and phasor models from vendors at the procurement stage to avoid late-stage compliance failures.
4. Integrate EMS with IT workload orchestrators so ramping, reactive dispatch, and shedding are tied directly to workload tiers.
5. Plan for continuous compliance with SCADA/PMU telemetry and periodic disturbance revalidation, not just one-time commissioning tests.

### 9.4 Recommendations for Vendors

1. Enhance UPS/PCS firmware to provide fast VAR response, harmonic mitigation, and grid-compliant ramp control.
2. Develop transparent EMT/phasor models that can be validated by AESO without exposing proprietary control IP.
3. Offer compliance test packages (FATs with AESO grid simulation profiles, harmonic certification) as part of standard delivery.
4. Collaborate with EMS vendors to ensure seamless integration of grid commands into power electronics and IT orchestration.

### 9.5 Recommendations for AESO and Regulators

1. Provide detailed compliance pathways (e.g., approved testing protocols, model submission guidelines) to reduce ambiguity.
2. Coordinate with NERC LLTF to align Alberta's framework with continental reliability standards.
3. Create knowledge-sharing forums to bridge IT and power engineering communities, accelerating cultural alignment.
4. Explore future market mechanisms (e.g., fast frequency response markets) that allow compliant data centres to monetize their grid-supportive capabilities.

## 9.6 Future Outlook: Programmable Demand as a Grid Resource

Alberta's TCDC rules are not just defensive—they lay the groundwork for a new era where programmable demand becomes a grid asset. Once compliant infrastructure is deployed, data centres can:

- Participate in ancillary services by modulating demand or injecting UPS/BESS support.
- Provide synthetic inertia and fast frequency response.
- Offer voltage and harmonic support in weak grid corridors.
- Contribute to demand flexibility markets, as seen in the UK and Nordics.

This positions hyperscale data centres not merely as consumers of power, but as co-stabilizers of the grid.

## 9.7 Smart Grid Analytics: The Partner for Transition

Smart Grid Analytics is uniquely placed to enable this transformation:

- Proven expertise in EMS/PCS/BESS deployments and microgrid integration.
- Deep proficiency in PSS®E and PSCAD studies, including validated EMT/phaser model delivery.
- Experience in digital twin analytics for compliance tracking, ramp forecasting, and harmonic monitoring.
- Ability to bridge IT–power divides through consulting, training, and integration support.

SGA's approach ensures that Alberta's data centres can not only comply with AESO's TCDC framework but also leverage their infrastructure to become active, reliable contributors to system stability.

## Final Reflections

The regulatory and technical journey Alberta is embarking upon is the vanguard of a broader global trend. As data centres expand in scale and complexity, they can no longer be treated as passive endpoints. Alberta's TCDC framework is a bold recognition of this reality. By embracing rigorous compliance, proactive engineering, and advanced analytics, data centres can move from being perceived as threats to being recognized as programmable partners in grid reliability.

Smart Grid Analytics stands ready to support this transition—ensuring that Alberta's grid, and others like it, can remain both resilient and innovative in the face of the digital era's unprecedented power demands.

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