

April 30, 2019

To: Stakeholders and Other Interested Parties

Re: **Alberta Electric System Operator (“AESO”) Reply to Stakeholder Comments**

- 1) **New Alberta Reliability Standard:**
 - a) **Proposed new Alberta Reliability Standard COM-002-AB-4, *Operating Personnel Communication Protocols* (“new COM-002-AB-4”);**
- 2) **Retirement of Existing Alberta Reliability Standards:**
 - a) **Proposed retirement of existing Alberta Reliability Standard COM-002-AB1-2a, *Communications and Coordination* (“existing COM-002-AB1-2a”);**
 - b) **Proposed retirement of existing Alberta Reliability Standard COM-001-AB1-1.1, *Telecommunications* (“existing COM-001-AB1-1.1”); and**
- 3) **Recommendation to Reject for Adoption North American Electric Reliability Corporation (“NERC”) Reliability Standard:**
 - a) **COM-001-3, *Communications* (“NERC COM-001-3”)**

collectively referred to as “COM Standards”

On March 19, 2019, the AESO issued a [Consultation Letter](#) regarding proposed COM Standards and requesting stakeholder comments on the same.

AESO Reply to Stakeholder Comments

On April 5, 2019, the AESO posted written comments received regarding proposed new COM-002-AB-4. The AESO’s replies to comments, including the rationale or basis for the position of the AESO that explains why certain positions were rejected or accepted, are set out in the attached *Stakeholder Comment and AESO Replies Matrix*.

Forwarding of the Final Proposed COM Standards

Pursuant to Section 19 of the *Transmission Regulation*, the AESO expects to forward the proposed COM Standards to the Alberta Utilities Commission (“Commission”) in June 2019, with the AESO’s recommendation that the Commission approve the proposed COM Standards as an Alberta reliability standard.

COM Standards are proposed to become effective to align with the proposed new Section 502.17 and proposed amended Section 502.4.

Attachments to AESO Reply Letter

The following documents are attached:

1. [Market Participant Comment and AESO Replies Matrix](#) on proposed new COM-002-AB-4; and

2. [Blackline](#) and [clean](#) copies of proposed new COM-002-AB-4.

If you have any questions, please contact the undersigned.

Sincerely,

"Melissa Mitchell-Moisson"

Melissa Mitchell-Moisson
Regulatory Administrator
Phone: 403-539-2948
Email: melissa.mitchell-moisson@aeso.ca

Attachments

Proposed new Alberta Reliability Standards COM-002-AB-4, *Operating Personnel Communication Protocols* (“new COM-002-AB-4”)

Date of Request for Comment:	March 19, 2019	
Period of Consultation:	March 19, 2019	through April 3, 2019

Alberta reliability standard	Stakeholder Comments and/or Alternative Proposal	AESO Replies
<p>New</p> <p>The AESO is seeking comments from stakeholders with regard to the following matters:</p> <ol style="list-style-type: none"> Are there any requirements contained in proposed new COM-002-AB-4 that are not clearly articulated? If yes, please indicate the specific section of proposed new COM-002-AB-4, describe the concern and suggest alternative language. Please provide any additional comments regarding proposed new COM-002-AB-4. 	<p>AltaLink Management Ltd. (“AML”)</p> <ol style="list-style-type: none"> For R1.6, how is the “nomenclature for system elements” defined/established? Also, AltaLink noticed that the AESO uses “system elements” rather than “Transmission interface Elements and Transmission interface Facilities” that is used in NERC’s COM-002-4. Could the AESO provide some explanation on the change? Does “system element” here have the same meaning as defined in the Consolidated Authoritative Document Glossary? For R4.1, should the assessment be based on all members of the operating personnel, or could it be based on sampled members of the operating personnel? Will the AESO develop an Information Document for assessing the adherence to the communication protocol? 	<ol style="list-style-type: none"> The AESO considers nomenclature to be the system element device name from a single line diagram. For example, 74s54 would be the nomenclature used to operate that breaker. The AESO has revised the wording to better align with the original NERC language. Yes, “system element” has the same meaning as defined in the Consolidated Authoritative Document Glossary. Requirement R4.1 refers to the assessment of the adherence of an entity’s operating personnel to the protocols developed under requirement R1. The AESO considers best practice to be that the assessment is based on all members of the entity’s operating personnel that could issue or receive an instruction or directive affecting the bulk electric system to or from another entity’s operating personnel. The AESO intends to develop an Information Document regarding COM-002-AB-4..

	<p>3. For R4.2, should the assessment be based on all members of the operating personnel, or could it be based on sampled members of the operating personnel? Will the AESO develop an Information Document for assessing the effectiveness of the communication protocol?</p>	<p>3. Requirement R4.2 refers to the assessment of the effectiveness of the protocols developed under requirement R.1 in meeting the purpose of the reliability standard. Such purpose is to improve communications for the issuance of instructions and directives, with predefined communications protocols, to reduce the possibility of miscommunication that could lead to action or inaction harmful to the reliability of the bulk electric system. The AESO considers best practice to be that the assessment is based on all members of the entity's operating personnel that could issue or receive an instruction or directive affecting the bulk electric system to or from another entity's operating personnel..</p> <p>The AESO intends to develop an Information Document regarding COM-002-AB-4.</p>
	<p><u>ATCO Electric Ltd. ("AE")</u></p> <p>4. R4 The term '12 months' should be replaced with 'annually'. This would be consistent with other ARS that have an action that must be completed yearly.</p> <p>5. R5 In regards to this requirement, AE is of the understanding that an oral 2-party, person to person directive or instruction during an energy emergency alert, would only have to comply with the details of this requirement if the directive or instruction issued during the energy emergency alert is directly related. If the instruction or directive is not directly related and is on another topic,</p>	<p>4. The AESO has chosen to remain consistent with the NERC requirement which is to use a 12 month period.</p> <p>5. The intent of COM-002-AB-4 is that the communication protocols developed under requirement R1 are used for the issuance and receipt of all instructions and directives whether specifically related to an energy emergency alert or not. During an energy emergency alert, all directives or instructions, whether directly related to</p>

	<p>the AESO or TFO would not need to comply? Please clarify.</p>	<p>the alert or not, must follow the protocols developed under requirement R1.</p>
	<p><u>EPCOR Distribution & Transmission Inc. (“EPCOR”)</u></p> <p>6. Please provide clarity on the term “multiple-party burst” as identified in section R1.4</p> <p>R1.6 reads as though all system element nomenclature must be documented (R1). EDTI proposes a clarification to “specify system element nomenclature when issuing an oral or written instruction or directive” or “specify the use of system element when issuing an oral or written instruction or directive”</p>	<p>6. Multiple-party burst would be considered a recorded communication system that could call multiple participants and deliver an operating instruction.</p> <p>7. The AESO will revise requirement R1.6 to read, “specify the use of system element nomenclature when issuing an oral or written instruction or directive”.</p>

	<p><u>Suncor Energy Inc. (“Suncor”)</u></p> <p>8. Suncor request that the AESO provides what is acceptable measure for “assess adherence” in Subsection R4.1. It is proposed to TFO only but not to GFOs, is there any rational for it?</p>	<p>8. To align with NERC. Acceptable evidence for assessing adherence to requirement R4.1 is described in measure MR4 of the proposed reliability standard. Each operator of a transmission facility is responsible for determining how to assess that their operating personnel are adhering to the communication protocols documented in requirement R1.</p> <p>The rationale for requirement R4.1 being applicable to the operator of a transmission facility, but not the operator of a generating unit, relates to the fact that the assessment under requirement R4 is intended to assess the effectiveness of the protocols developed under requirement R1. Requirement R1 is directed at the operator of a transmission facility, being an entity that can issue instructions or directives that can affect the reliability of the bulk electric system.</p> <p>The operator of a generating unit cannot issue instructions or directives that could affect the reliability of the bulk electric system. However, the operator of a generating unit may receive them. Requirement R6 details the requirement to respond appropriately for those entities that receive instructions or directives that could affect the reliability of the bulk electric system.</p>
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