

July 27, 2022

To: Market Participants, Market Surveillance Administrator, and other interested parties (“Stakeholders”)

Re: **Consultation Letter on the following:**

- 1) **Proposed new COM-001-AB-3, *Communications*** (“COM-001-AB-3”);
- 2) **Proposed new COM-002-AB-4, *Operating Personnel Communication Protocols*** (“COM-002-AB-4”);
- 3) **Proposed retirement of existing COM-001-AB1-1.1, *Communications*** (“COM-001-AB1-1.1”);
- 4) **Proposed retirement of existing COM-002-AB1-2a, *Operating Personnel Communication Protocols*** (“COM-002-AB1-2a”); and
- 5) **Proposed amended Section 502.4 of the ISO rules, *Automated Dispatch and Messaging System and Voice Communication System Requirements*** (“Section 502.4”).

(collectively referred to as the “Communication ISO Rule and Reliability Standards”)

Section 19 of the *Transmission Regulation* requires the Alberta Electric System Operator (“AESO”) to consult with Stakeholders likely to be directly affected by the AESO’s adoption or making of reliability standards, and also requires the AESO to forward the proposed reliability standards to the Alberta Utilities Commission (“Commission”) for review along with the AESO’s recommendation that the Commission approve or reject them.

Alberta Utilities Commission Rule 017, *Procedures and Process for Development of ISO Rules and Filing of ISO Rules with the Alberta Utilities Commission* (“AUC Rule 017”) requires the AESO to provide notice and seek feedback from Stakeholders on the development of proposed rules.

Accordingly, the AESO is providing notice and seeking comments from Stakeholders on the Communication ISO Rule and Reliability Standards.

Applicability

The proposed new COM-001-AB-3 is applicable to:

- (a) the operator of a transmission facility;
- (b) the operator of an electric distribution system that is directly connected to the transmission system or to transmission facilities within the City of Medicine Hat;
- (c) the operator of a generating unit that is directly connected to the transmission system or to transmission facilities within the City of Medicine Hat and has a maximum authorized real power greater than or equal to 5 MW;
- (d) the operator of an aggregated generating facility that is directly connected to the transmission system or to transmission facilities within the City of Medicine Hat and has a maximum authorized real power greater than or equal to 5 MW; and
- (e) the ISO.

The proposed new COM-002-AB-4 is applicable to:

- (a) the operator of a transmission facility;
- (b) the operator of a generating unit that has a maximum authorized real power greater than or equal to 5 MW;

- (c) the operator of an aggregated generating facility has a maximum authorized real power greater than or equal to 5 MW;
- (d) the operator of an electric distribution system that is directly connected to the transmission system or to transmission facilities within the City of Medicine Hat; and
- (e) the ISO.

The proposed amended Section 502.4 applies to:

- (a) a pool participant that submits offers or bids for a pool asset, excluding import assets and export assets, in either one or both of:
 - (i) the energy market; and
 - (ii) the ancillary service market, for which the ISO issues dispatches or directives through the ISO's Automated Dispatch and Messaging System.

Background

In 2018, the AESO initiated Stakeholder engagement to modify the existing requirements in COM-001-AB1-1.1, COM-002-AB1-2a, and Section 502.4. The objective of these existing authoritative documents is to ensure that the AESO and each applicable market participant have adequate and reliable voice and message telecommunication facilities, both internally and with others, for the exchange of connection and operating information necessary to maintain reliability.

The purpose of the Communication ISO Rule and Reliability Standards is to: (i) align the voice and message telecommunication facilities requirements with the latest NERC communication reliability standards; (ii) eliminate overlapping requirements in current AESO authoritative documents; and (iii) improve the clarity and organization of the voice communication, Automated Dispatch and Messaging System (“ADaMS”), and operating personnel communication protocol requirements within relevant AESO authoritative documents.

On May 10, 2022, the AESO hosted a Stakeholder session (“May 10th Stakeholder Session”) to update Stakeholders on the latest Communication ISO Rule and Reliability Standards and to solicit feedback on the same. Following the May 10th Stakeholder session and in response to Stakeholder feedback, minor amendments were made to proposed new COM-001-AB-3, proposed new COM-002-AB-4, and the COM-001-AB-3 information document #2012-001RS, *Communications* (“COM-001 ID”).

A summary of the proposed changes, including how the feedback from the May 10th Stakeholder Session was incorporated into the Communication ISO Rule and Reliability Standards, is outlined below.

Summary of Proposed Changes

Proposed new COM-001-AB-3

The AESO is proposing to retire existing COM-001-AB1-1.1 and replace it with proposed COM-001-AB-3, which sets out voice communication system technical and operating requirements. Certain voice communication system requirements in the existing Section 502.4 were modified and moved to proposed COM-001-AB-3. These requirements are flagged by unique numbering (e.g., requirement R3.A1).

In developing the proposed new COM-001-AB-3, the AESO determined that certain Alberta variances and administrative changes¹ were required to: (i) adopt NERC COM-001-3 into Alberta without creating material changes to the electricity industry framework; and (ii) ensure that the AESO and operators of transmission facilities in Alberta have the appropriate voice communication system for the safe, reliable, and economic operation of the Alberta interconnected electric system. In addition, the AESO made administrative amendments and amendments to ensure consistency with the AESO's Consolidated Authoritative Document Glossary (“CADG”).

¹ Administrative changes are referred to as Reason for Difference in the AESO's comparison matrix.

May 10th Stakeholder Session

Stakeholder feedback received during the May 10th Stakeholder Session led to revisions to Requirements R3.A1, R7.A1, R8.A1, R15.A1, and Appendices 1, 2, and 3. In addition, revisions were made to the related measures MR3.A1, MR7.A1, MR8.A1, R15.A1, and COM-001 ID content.

With respect to Requirement R3.A1, R7.A1, and R8.A1 of COM-001-AB-3, Stakeholders asked for clarification regarding the language used, specifically whether the requirement is for operators to “use” primary voice communication capability located in each control room. In response and to clarify the intent of these requirements, the AESO has revised Requirements R3.A1, R7.A1, and R8.A1 of COM-001-AB-3 and the associated measures, by changing “use” to “have”. The intent of these requirements is to stipulate that each control room has primary voice communication capability. In addition, the related COM-001 ID subsections, Subsections 2.3 and 3.3, have been revised to provide further information.

Stakeholders also asked for clarity regarding Requirement R15.A1 of COM-001-AB-3, including how Responsible Entities show compliance if its applicable control room does not experience an extended power outage. The AESO addressed this question by amending Requirement R15.A1 and related measure MR15.A1 to improve clarity and by adding the word “capability”. This clarifies that Requirement R15.A1 requires each Responsible Entity to ensure its applicable control room backup voice communication system equipment is capable of remaining operational, for a minimum of 8 hours, in the event of an extended power outage of its main power supply. Further information was also added to measure MR15.A1 and Subsection 3.7 of the COM-001 ID to explain how the AESO anticipates a Responsible Entity would illustrate compliance to Requirement R15.A1.

With respect to Appendix 1, Appendix 2, and Appendix 3, a Stakeholder asked for clarity on which operators of a transmission facility, that do not operate a radial circuit, are required to have utility orderwire service as a backup voice communication system. In addition, Stakeholders pointed out that there were some discrepancies in Appendix 1 and Appendix 2.

The AESO updated Appendix 1, Appendix 2, and Appendix 3 of COM-001-AB-3 to include a reference to a list of control rooms that are not required to have utility orderwire service as their backup voice communication system, apart from those that only operate a radial circuit. This list will be included in Subsection 3.9 of the COM-001 ID once it has been finalized. This list will clarify the control rooms that will not be required to have utility orderwire service, and instead, would have the same backup voice communication system options as control rooms that only operate a radial circuit. In addition, editorial updates were made to both Appendix 1, 2, and 3 to improve clarity and fix inconsistencies between the appendices.

A summary of all Alberta variances and administrative changes, along with rationale for the changes, can be found in the *Comparison Rationale Matrix for proposed new COM-001-AB-3* posted on the AESO's website under Consultation Letter material. The AESO has included a blackline of the comparison rationale matrix for proposed new COM-001-AB-3 due to the extensive changes in the *AESO Reason for Differences or Alberta Variance to NERC COM-001-3* column that were made between the March 29, 2022 version and July 27, 2022 version of the document.

Proposed new COM-002-AB-4

Proposed new COM-002-AB-4 contains operating personnel communication protocol requirements and aligns closely with NERC COM-002-4. COM-002-AB-4 is intended to replace COM-002-AB1-2a, which will be retired.

In developing the proposed new COM-002-AB-4, the AESO determined that certain Alberta variances and administrative changes were required to adopt NERC COM-002-4 into Alberta without creating material change to the electricity industry framework. In addition, the AESO made administrative changes to ensure consistency with the AESO's CADG.

Following the May 10th Stakeholder Session, the AESO revised Requirement R1.6 to align more closely with NERC. The AESO is also providing Information Document #2022-001, *Operating Personnel*

Communications Protocols (“COM-002 ID”) for Stakeholder comment, which provides clarity to some of the requirements in the proposed new COM-002-AB-4.

A summary of these Alberta variances and administrative changes, along with rationale for the changes, can be found in the *Comparison Rationale Matrix for proposed new COM-002-AB-4* posted on the AESO’s website under Consultation Letter material.

Proposed amended Section 502.4

In developing the Communication ISO rule and Reliability Standards, the AESO determined that it would be more efficient if all voice communications requirements were housed within one authoritative document. Therefore, the AESO moved the voice communication requirements from existing Section 502.4 into proposed new COM-001-AB-3. The requirements in proposed amended Section 502.4 now specifically relate to ADaMS. Other notable changes include the following:

- The applicability section of proposed amended Section 502.4 has been broadened to include all pool participants receiving dispatches and directives that the AESO provides through ADaMs. Requiring all relevant pool participants to use ADaMS, optimizes the use of the AESO’s ADaMS tool.
- The existing requirements were replaced with requirements that each relevant pool participant access and operate ADaMs and be available 24 hours a day to receive dispatches and directives and phone calls through a phone number provided to the AESO. This revision was required to better reflect the AESO’s intent that each pool participant be available to allow the AESO to operate the market efficiently and reliably.

The blackline and clean copy of the proposed Section 502.4 are posted on the AESO’s website under Consultation Letter material.

Defined Terms

When reviewing the attached Communication ISO Rule and Reliability Standards, Stakeholders should note that all defined terms appear **bolded**. Stakeholders are encouraged to refer to the AESO’s CADG when reviewing proposed reliability standards to ensure they have an accurate understanding of those defined terms.

Request for Comment

Please use the *Stakeholder Comment Matrix* document, which is posted on the AESO’s website under Consultation Letter material, when submitting comments to the AESO. The AESO only considers written comments when finalizing the Communication ISO Rule and Reliability Standards.

Stakeholders should ensure that comments provided represent all interests within their organization.

Please respond to the questions in the attached *Stakeholder Comment Matrix* document and provide your specific comments, proposed revisions, and reasons for your position. Providing general comments does not give the AESO any specific issue to consider and address, and results in a general response. The scope of comments is limited to the Communication ISO Rule and Reliability Standards and related information documents.

Stakeholders are asked to provide comments no later than **August 19, 2022** to ars_comments@aeso.ca. Adherence to deadlines is essential to the integrity of the comment process, and as such, the AESO may choose not to consider any Stakeholder comments received after the deadline.

The table below provides the remaining development steps and related dates for Communication ISO rules and reliability standard.

Remaining Development Steps and Related Dates for Communication ISO Rule and Reliability Standards development

Development Step	Date
Stakeholder Comments Due on Communication ISO Rule and Reliability Standards	August 19, 2022
Stakeholder Comments on Communication ISO Rule and Reliability Standards to be posted on the AESO website	August 26, 2022
AESO Replies to Stakeholder Comments to be posted	Estimate: September/October 2022
Forward and file the Communication ISO Rule and Reliability Standards to the Commission	Estimate: October/November 2022 (September 2022 if no Stakeholder comments are received)
Communication ISO Rule and Reliability Standard comes into effect (first day of the calendar quarter that follows 3 full calendar quarters after Commission approval)	Estimate: October 1, 2023

Consultation Letter Materials

The following documents are posted on the stakeholder engagement page:

1. *Stakeholder Comment Matrix* document for the Communication ISO Rule and Reliability Standards;
2. Clean copy of proposed new COM-001-AB-3;
3. Clean copy of proposed new COM-002-AB-4;
4. Copy of existing COM-001-AB1-1.1;
5. Copy of existing COM-002-AB1-2a;
6. Blackline and clean copy of proposed amended Section 502.4;
7. Blackline and clean copy of Comparison Rationale Matrix for proposed new COM-001-AB-3;
8. Comparison Rationale Matrix for proposed new COM-002-AB-4;
9. Proposed amended ID #2012-001RS, *Communications*;
10. Proposed amended ID #2017-006R, *Automated Dispatch and Messaging System Requirements*; and
11. Proposed new ID #2022-001, *Operating Personnel Communications Protocols*.

Sincerely,

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