

**Stakeholder Comment Matrix – July 28, 2020**  
**Development of a Proposed New and Amended Communication ISO Rules and Reliability Standards**  
**July 2020 Stakeholder Session**



<b>Period of Comment:</b> July 28, 2020 through August 19, 2020	<b>Contact:</b> Thomas Ng
<b>Comments From:</b> Capital Power	<b>Phone:</b> (780) 392-5362
<b>Date:</b> 2020/08/19	<b>Email:</b> tng@capitalpower.com

Instructions:

1. Please fill out the section above as indicated.
2. Please refer back to the Letter of Notice under the “Attachments” section to view materials related to the proposed new and amended communication ISO rules and reliability standards.
3. Email your completed comment matrix to [rules\\_comments@aeso.ca](mailto:rules_comments@aeso.ca) by **August 19, 2020**.

***The AESO is seeking comments from Stakeholders with regard to the following matters:***



	Question	Stakeholder Comments
1.	Please comment on the communication ISO rules and reliability standards stakeholder session hosted on July 20, 2020. Was the session valuable?	<p>Capital Power appreciates the opportunity to participate in the stakeholder session regarding proposed new and amended communication standards and rules. The session was valuable and provided stakeholders with an opportunity to understand the rationale for the proposed changes to AESO rules.</p> <p>As noted in the session, the AESO intends to release details of a proposed system project relating to implementation of the requirements proposed in the new and amended ISO rules and reliability standards. As noted at the session and in the comments below, Capital Power has significant concerns with the proposed requirements in ISO Rule 502.17. Capital Power is, therefore, supportive of the AESO’s intention to further discuss alternative approaches for implementation, including a potential system project. Given the significant concerns that exist with the proposed requirements, Capital Power submits that stakeholders should have an opportunity to understand the scope and timing of the system project prior to the AESO filing an application with the Commission for any approvals relating to the amended ISO rules.</p>
2.	Do you have any comments related to the draft proposed new COM-001-AB-3, <i>Communications</i> , that were not discussed at the July 2020 Stakeholder Session? If so, please comment.	<p>In the NERC version of <a href="#">COM-001-3</a> the term “<a href="#">Interpersonal Communication</a>” is defined as: “[a]ny medium that allows two or more individuals to interact, consult, or exchange information”. However, during the AESO consultation it was evident that the AESO, via ISO Rule 502.4, plans on limiting the definition of interpersonal communication in Alberta. Capital Power requests that the AESO include the AESO’s definition of Interpersonal Communication in the AESO’s <a href="#">Consolidated Authoritative Document Glossary</a> so as to avoid confusion with the NERC definition of the term.</p>
3.	Do you have any comments related to the draft proposed amended Section 502.4, <i>Automated Dispatch and Messaging System</i> , that were not discussed at the July 2020 Stakeholder Session? If so, please comment.	<p>Capital Power seeks clarification on whether subsection 3 is applicable to carbon copy only ADaMS accounts. These accounts receive dispatch and directive instructions but may not acknowledge the dispatch and or directive instructions. To require pool participants carbon copy only ADaMS accounts to comply with this requirement may provide little to no value to the reliability of the Alberta Interconnected Electric System.</p>



<p>4.</p>	<p>Do you have any comments related to the draft proposed amended Section 502.17, <i>Voice Communication System Requirements</i>, that were not discussed at the July 2020 Stakeholder Session? If so, please comment.</p>	<p>As previously noted in Capital Power's stakeholder comment matrix submitted on September 5, 2019, Capital Power has significant concerns relating to the implementation cost of the utility orderwire architecture for generation units greater than 300 MW. These concerns relate to the expected capital expenditures, operational expenditures and commercial costs that market participants would be required to absorb as part of the implementation of ISO Rule 502.17. These costs are significant for market participants and will disproportionately increase costs for large generators operating in the energy market.</p> <p>While the costs are borne by large generators, the benefits of utility orderwire infrastructure accrue broadly to the Alberta Interconnected Electric System and not to individual generators. The AESO acknowledged this fact at the July 20 session, stating that the benefits of utility orderwire would primarily be realized during major system restoration events. It is, therefore, appropriate to consider a mechanism for cost recovery for large generators that recognizes the substantial system benefit that would come from investments by individual generators. Absent a mechanism for cost recovery, the requirements disproportionately impact a subset of generators and renders those assets less competitive in the energy market.</p> <p>During the stakeholder engagement on July 20, 2020, the AESO indicated that a proposed system project is being considered to implement the utility orderwire changes. Subject to details of the scope and timing, Capital Power submits that a system project, led by the AESO, is a more appropriate way to implement significant orderwire infrastructure upgrades in the province. Capital Power requests that the AESO considers the following in their system project scope:</p> <ul style="list-style-type: none"> <li>• A mechanism for cost recovery should be included which would allow Market Participants an opportunity to recover prudently incurred cost of implementing, operating and maintaining utility orderwire. Capital Power believes this is an appropriate way to address the expenditure and cost issues outlined in our stakeholder comment matrix submission from September 5, 2019.</li> <li>• The AESO noted that further SCADA changes are being considered. SCADA changes may come with costs to an organization and any changes should be completed with stakeholder consultation.</li> <li>• The scope should also define roles and responsibility of GFOs and TFOs with respect to the system project. In addition, timelines should be included.</li> </ul>
-----------	--	---



	Question	Stakeholder Comments
5.	Do you have any additional comments?	<p>Provided that the utility orderwire system project proceeds, the AESO should consider defining availability requirements by entity. Capital Power is concerned with the availability requirements imposed on market participants given that parts of the utility orderwire infrastructure are owned, operated and maintained by the TFO. The AESO should consider the upstream effects if there are outages on the system that are out of the market participant’s control, as this places generating units at risk of being non-compliant.</p> <p>The proposed availability requirements for the utility orderwire is stringent and may pose challenges for market participants to comply. The AESO should consider that an availability percentage of 98% to apply on non-planned/unscheduled work and include provisions for market participants (GFOs or TFOs) to submit planned outages and maintenance activities to the utility orderwire system. Similar to ISO Rule Section 502.8, there should be provisions to allow market participants to create and communicate outage and maintenance plans with the AESO when such infrastructure outages are in effect.</p> <p>The AESO’s recommendation for market participants to submit a waiver and variance request by ISO Rule Section 103.14 to provide compliance relief, from when the rule is implemented to when the utility orderwire infrastructure has been implemented, is administrative in nature. Capital Power recommends that the AESO makes this process as smooth as possible and without time delays or to include a timeline to meet compliance requirements into the rule.</p>

Thank you for your input. Please email your comments to: [rules\\_comments@aeso.ca](mailto:rules_comments@aeso.ca).