

March 19, 2019

To: Market Surveillance Administrator, Market Participants and Other Interested Parties

Re: **Letter of Notice of Proposed New and Amended ISO Rules:**

- 1) **New Section 502.17 of the ISO Rules, *Voice Communication System Requirements* (“new Section 502.17”); and**
- 2) **Amendments to Section 502.4 of the ISO Rules, *Automated Dispatch and Messaging System and Voice Communication System Requirements* (“amended Section 502.4”)**

**(collectively referred to as the “new and amended ISO Rules”)**

Pursuant to Section 6.3 of Alberta Utilities Commission Rule 017: *Procedures and Process for Development of ISO Rules and Filing of ISO Rules with the Alberta Utilities Commission*, the Alberta Electric System Operator (“AESO”) is providing notice and seeking feedback from the Market Surveillance Administrator, market participants, and other interested parties (“Stakeholders”) on the proposed new and amended ISO Rules.

### **Applicability**

The proposed new Section 502.17 is applicable to:

- (a) the following electricity market participants:
  - (i) the operator of a generating unit with a maximum authorized real power of 5 MW or greater;
  - (ii) the operator of an aggregated generating facility with an aggregated maximum authorized real power of 5 MW or greater;
  - (iii) the operator of a transmission facility;
  - (iv) the operator of an electric distribution system; and
  - (v) a pool participant; and
- (b) the AESO.

The proposed amended Section 502.4 is applicable to:

- (a) a pool participant who may receive a dispatch or a directive in the electricity market; and
- (b) the AESO.

### **Issue**

The AESO has identified that certain amendments to the following authoritative documents are necessary to address content overlap and to improve the clarity of the requirements:

- (a) [Alberta Reliability Standards COM-001-AB1-1.1, \*Telecommunications\* \(“COM-001-AB1-1.1”\);](#)
- (b) [Alberta Reliability Standards COM-002-AB1-2a, \*Communications and Coordination\* \(“COM-002-AB1-2a”\);](#)

- (c) [Section 502.4 of the ISO Rules, Automated Dispatch and Messaging System and Voice Communication System Requirements \("Section 502.4"\)](#).

## Background

Existing Alberta reliability standards COM-001-AB1-1.1 and COM-002-AB1-2a were adopted in Alberta on October 1, 2013. The purpose of these reliability standards is to ensure the AESO and each operator of a transmission facility have adequate and reliable voice and message telecommunication facilities internally and with others for the exchange of interconnection and operating information necessary to maintain reliability.

Existing Section 502.4 prescribes the minimum Automated Dispatch and Messaging System and voice communication systems requirements for market participants with facilities in Alberta, other than those to which COM-001-AB1-1.1 and COM-002-AB1-2a apply.

The AESO has determined that greater clarity is required regarding the facilities to which COM-001-AB1-1.1 and COM-002-AB1-2a are applicable, and to eliminate any potential overlap with existing Section 502.4.

Since the adoption of COM-001-AB1-1.1 and COM-002-AB1-2a in Alberta, the corresponding North American Electric Reliability Corporation ("NERC") standards have been revised<sup>1</sup> resulting in a consolidation of the subject matter, an enhanced clarity in the wording of the requirements, and a significant shift in the focus and content of NERC COM-002-4, which now primarily addresses operations communication protocols rather than communications facilities.

The specific details of the consultation and amendments related to COM-001-AB1-1.1, COM-002-AB1-2a and proposed new COM-002-AB-4, *Operating Personnel Communication Protocols* ("COM-002-AB-4") can be found on the AESO website on the "Stakeholder engagement" page.

## Objectives

The AESO intends to consult on and forward to the Alberta Utilities Commission ("Commission") retirement of existing COM-001-AB1-1.1 and COM-002-AB1-2a, and to consult on and file with the Commission amendments to the new and amended ISO rules at the same time. The purpose and objective of these amendments are as follows:

- Proposed amended Section 502.4: To be amended so as to retain the details related to Automated Dispatch and Messaging System requirements and accountabilities for electricity market participants and the AESO and to remove all voice communication requirements and accountabilities for electricity market participants and the AESO. Existing Section 502.4 *Automated Dispatch and Messaging System and Voice Communication System Requirements* will be renamed *Automated Dispatch and Messaging System*;
- Proposed new Section 502.17: To be drafted to combine all voice communication requirements and accountabilities for electricity market participants and the AESO from existing Section 502.4 and NERC COM-001-3 in a single document;
- Existing COM-001-AB1-1.1: To be retired as the requirements from the latest version of the NERC COM-001-3 will be addressed in proposed new Section 502.17;
- Existing COM-002-AB1-2a: To be retired and replaced with COM-002-AB-4 which focuses on reducing the possibility of miscommunications through requirements for predefined communication protocols; and
- Proposed new COM-002-AB-4: To be adopted to replace existing COM-002-AB1-2a which focuses on reducing the possibility of miscommunications through requirements for pre-defined communication protocols.

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<sup>1</sup> The NERC reliability standards COM-001-2.1, *Communications* ("NERC COM-001-2.1"), and COM-002-4, *Operating Personnel Communications Protocols* ("NERC COM-002-4").

The specific details of the consultation related to the existing Alberta reliability standards COM-001-AB1-1.1 and COM-002-AB1-2a can be found on the AESO website on the “Stakeholder engagement” page.

### Previous Consultation

On October 9, 2018, a Letter of Notice for Development of Proposed New and Amended ISO rules was issued to stakeholders requesting their feedback on the development of the proposed new Section 502.17 and amended Section 502.4.

On October 24, 2018, the AESO received comments from Stakeholders that indicated their intent to participate in the consultation on these ISO rules due to a concern that these ISO rules did not include a method for the AESO to grant waivers or variances.

Due in part to these comments, the AESO issued a [Letter of Notice for Development of Proposed New Waivers and Variance rule](#) and hosted a Stakeholder Consultation Session on February 4, 2019. The process of developing a new waivers and variances ISO rule is ongoing and, accordingly, the AESO does not intend to include a specific provision allowing for waivers and variances in these new and amended ISO rules.

### Stakeholder Comments

Stakeholders may submit written comments to the AESO using the *Stakeholder Comment Matrix – Draft Proposed ISO Rule*. The AESO will only consider written comments in finalizing the proposed new and amended ISO rules. Stakeholders should ensure that comments provided represent all interests within their organization. The scope of comments is limited to the proposed new and amended ISO rules. The AESO will not consider any comments that are outside of this scope.

The AESO has posted, on the [AESO website](#), any data, analyses, or other material that the AESO considers to be relevant to the development of the draft proposed new and amended ISO rules.

The deadline for Stakeholders to provide comments is **April 3, 2019**, to [rules\\_comments@aeso.ca](mailto:rules_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 AESO will publish all Stakeholder comments, received by the deadline, and the AESO’s responses on the AESO website on April 18, 2019.

If no comments are received by the AESO regarding the draft proposed new and amended ISO rules, the AESO will proceed to apply to the Commission for approval of new and amended ISO rules pursuant to AUC Rule 017, Section 7.1.

### Related Materials

1. [Copy](#) of the draft proposed new Section 502.17;
2. [Stakeholder Comment Matrix](#) for the draft proposed new Section 502.17;
3. [Blackline](#) and [clean](#) copies of the draft proposed amended Section 502.4; and
4. [Stakeholder Comment Matrix](#) for the draft proposed amended Section 502.4.

Sincerely,

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