

4. [REDACTED]

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[REDACTED]

5. **ISO rules Section 502.17 – Voice Communication System Requirements**

The following comments were received on draft ISO rules Section 502.17:

- a. Rule 502.4 refers to New and Existing Systems – will the dates and grandfathering be moved into the new 502.17? The draft 502.17 does not include these requirements.
- b. 4 (2) (a) is this specific to cell or landline, or both, or is this order wire only?
- c. 4 (2) (c) automatically forwarded to another number if the primary number is busy or otherwise not available; what does otherwise not available mean? What if the line is not available due to a failure, then this will not work, in this case recommend using the backup.
- d. 4 (5) clarity is needed around; use the same service provider as used by the ISO. Is service provider the same as type?
- e. Are market participants with SAT phones grandfathered? If not then a definition of Order Wire is needed.

- f. ARCDG would like the ISO rule 502.17 to be reviewed by the technical work group that [AESO] is coordinating. The ARCDG would like to see a list of the members attending this technical work group. This will be helpful to align with their internal stakeholders.
- g. 5 (1) control room vs control center, appendix 2 is not clear. Can the AESO define or change the requirement to include control centre?
- h. 5 (2) (b) ...and not depend on the commercial telephone or data system. “Data systems”, what is meant by this? Can the AESO provide an example?
- i. 6 (1) radio or cell phone service? Can it be one or the other?
- j. 6 (2) can you use Telus or does this need to be an internal system?
- k. 7 (3) each operator of a transmission facility and operator of an electric distribution system required to have primary and (should this be ‘or’) backup voice communication systems....
- l. ...mean time to repair of 4 hours or less. What is meant by ‘mean time’? 4 hours seems unreasonable, what if order wire fails in a remote area? Also, the applicable entity has no control over a 3rd party telecommunications provider.
- m. 11 (2) Some ARCDG members thought it would be helpful to standardize the satellite phone system, e.g. MSAT to MSAT.
- n. Appendix 1 – need to add another column to the table separating Primary and Backup, make it clear that one of the following systems is required.

[REDACTED]