



# **ARS Program Enhancements Stakeholder Engagement Session**

May 11, 2022

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## *OUR ENGAGEMENT PRINCIPLES*

**Inclusive and Accessible**

**Strategic and Coordinated**

**Transparent and Timely**

**Customized and Meaningful**

- The participation of everyone here is critical to the engagement process
- To ensure everyone has the opportunity to participate, we ask you to:
  - Listen to understand others' perspectives
  - Disagree respectfully
  - Balance airtime fairly
  - Keep an open mind

# Welcome and Introductions

- Pauline McLean, Vice President, Law, General Counsel & Corporate Secretary
- Marie-France Samaroden, Vice President, Grid Reliability – Operations
- Bill Baker, Vice President, Information Technology
- Daniela Cismaru, Manager, Compliance Reliability Standards
- Ping-Kwan Keung, Manager, Standards & Modeling
- Kathryn Kuber, Reliability Standards Technical Specialist

- Purpose
  - The purpose of the session is to engage stakeholders in a discussion of the AESO's draft ARS Program Enhancements Roadmap and share next steps
- Session objectives
  - Share our learnings from stakeholder feedback on the existing ARS Program
  - Present draft roadmap including proposed pace and prioritization
  - Seek stakeholder feedback on draft roadmap
  - Share next steps and timing

Time	Agenda Item	Presenter
9:00 – 9:10	Welcome and introductions	Daniela Cismaru
9:10 – 9:20	Opening remarks	Pauline McLean
9:20 – 9:30	Draft High-Level ARS Program Enhancements Roadmap	Marie-France Samaroden
9:30 – 9:40	Q&A	All
9:40 – 9:55	Risk-Based Approach <ul style="list-style-type: none"> <li>What we heard, proposed approach and activities</li> </ul>	Ping-Kwan Keung
9:55 – 10:05	Enhancements to Reliability Standards Related Processes <ul style="list-style-type: none"> <li>What we heard, proposed approach and activities</li> </ul>	
10:05 – 10:20	Q&A	All
10:20 – 10:30	Supporting Information and Guidance Materials <ul style="list-style-type: none"> <li>What we heard, proposed approach and activities</li> </ul>	Kathryn Kuber
10:30 – 10:40	ARS Program Work Plan <ul style="list-style-type: none"> <li>What we heard, proposed approach and activities</li> </ul>	
10:40 – 10:50	Stakeholder Engagement and Discussion <ul style="list-style-type: none"> <li>What we heard, proposed approach and activities</li> </ul>	
10:50 – 11:00	Q&A	All
11:00 – 11:15	Compliance Monitoring Program and Processes <ul style="list-style-type: none"> <li>What we heard, proposed approach and activities</li> </ul>	Daniela Cismaru
11:15 – 11:25	Q&A	All
11:25 – 11:30	Next Steps and session close-out	Daniela Cismaru

# Registrants (as of May 6, 2022)

- Alberta Newsprint Company
- Alberta-Pacific Forest Industries
- AltaLink Management Ltd.
- ATCO Electric
- BBA Engineering
- Best Consulting Solutions Inc.
- Canadian Forest Products Ltd. (Canfor)
- Canadian Natural Resources Limited (CNRL)
- Cancarb Limited
- Capital Power Corporation
- Castle Rock
- Cenovus Energy
- City of Lethbridge
- City of Medicine Hat
- City of Red Deer
- CNOOC
- Constellation Energy Generation (Grande Prairie Generation)
- Dow Chemical Canada ULC
- Enbridge Pipelines
- Enfinite
- ENMAX
- EPCOR
- GridSME
- Heartland Generation Ltd.
- Interpipeline
- Keyera Corp.
- Lionstooth Energy Inc.
- Market Surveillance Administrator (MSA)
- MATL Canada LP
- Maxim Power Corp.
- Members of the Public
- NOVA Chemicals
- NRGCS
- NRGreen
- Pembina Pipeline Corporation
- Pieridae Energy Ltd.
- Renewable Energy Systems
- Suncor Energy Inc.
- TC Energy
- TransAlta Corporation
- Utilities Consumer Advocate (UCA)

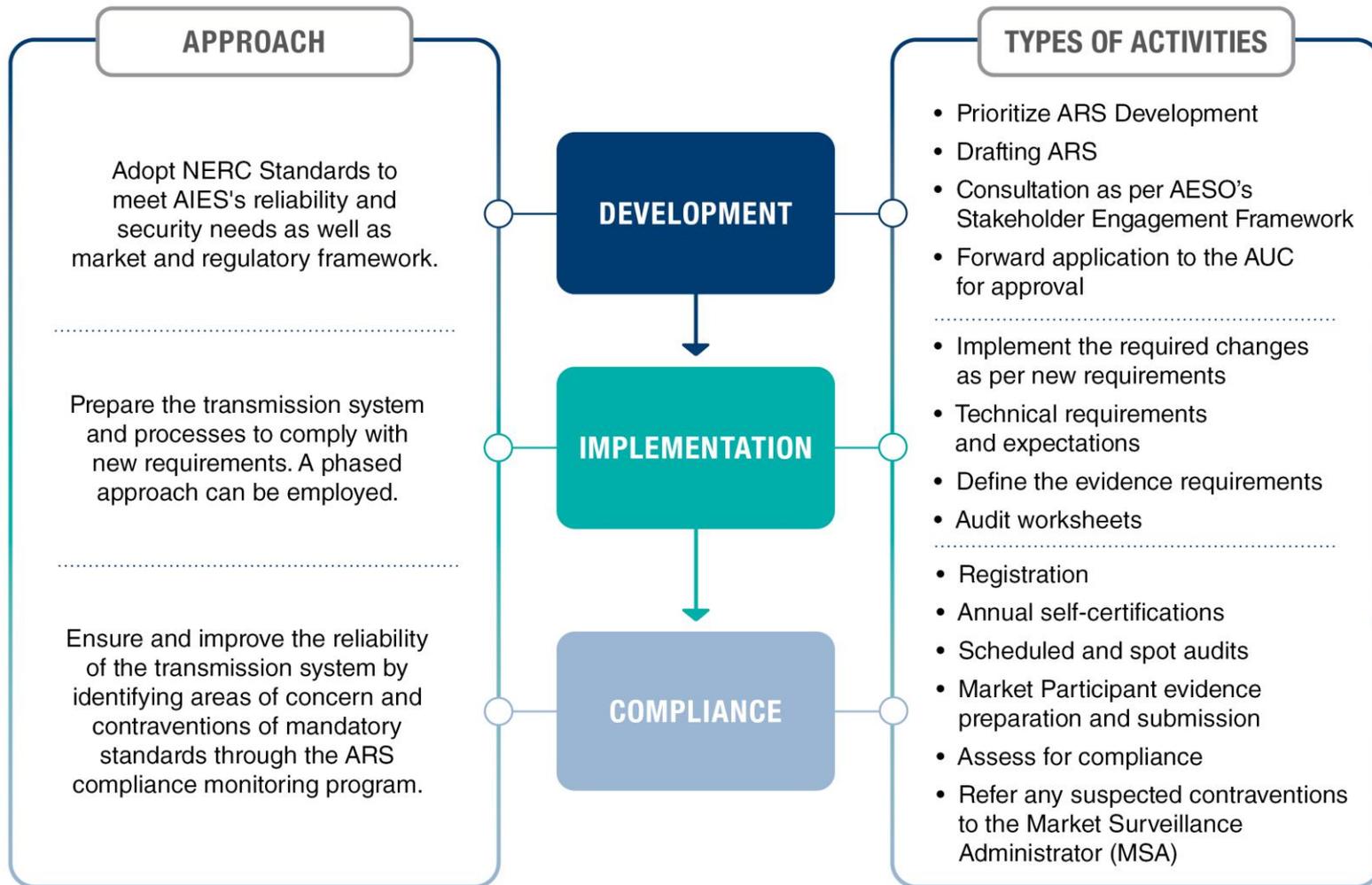
# Opening Remarks

- The AESO is playing a leadership role in enabling the transformation of the province's electricity sector while ensuring reliable, affordable power is always available to Albertans
- To support our areas of strategic change and to ensure we have a strong foundation we are taking steps to strengthen our core business including:
  - Seeking opportunities to reduce regulatory burden in existing processes and reducing costs through risk-based rules and standards
  - Strengthening cyber security capabilities across the industry through risk-based adoption of enhanced cyber-protection standards
  - Collaborating with stakeholders to prioritize and coordinate the resolution of key issues that are within the AESO's mandate, and of importance to industry and Albertans

- At the end of January 2022, the AESO had received over 100 pages of submissions
- Stakeholder feedback was assessed in parallel with an internal review and those have guided the development of the AESO's high-level draft ARS Program Enhancements Roadmap (ARS Roadmap)
- The ARS Roadmap sets out the AESO's initial thinking of how it would like to tackle improvements to all aspects of the ARS Program Lifecycle (lifecycle)
  - Overall, will be a complex undertaking
  - High level of interdependency across the streams of initiatives
  - Pace and prioritization of activities will be assessed frequently

- This is an important initiative to the AESO, and we are committed to advancing this work and integrating efficiencies throughout the lifecycle
- We recognize the complexity of this initiative and the significant lift it will require on both internal resources and our stakeholders
- There are some changes that can be made very quickly, while other changes will take some time to organize and orchestrate given the complexity involved
- We will look for opportunities to pilot new approaches across the lifecycle
- This is a work in progress – we are checking in to share our progress to date on our draft roadmap and seeking your feedback to affirm if we are on the right track
- As we move forward and details are flushed out, they will be incorporated into the roadmap and updates provided

# Draft High-Level ARS Program Enhancements Roadmap



- Sets out the AESO's high-level plan to facilitate the integration of an enhanced risk-based approach across the ARS Program Lifecycle
  - Seeks opportunities to add value while maintaining the safe, reliable, and economic operation of the Alberta Interconnected Electric System
  - Seeks to integrate efficiencies into both internally and externally facing processes
  - Seeks to better facilitate a common understanding of ARS requirements and expectations in support of implementation and compliance among market participants



Q&A

# Risk-Based Approach

- Embed a more comprehensive risk-based approach –
  - Many stakeholders support the NERC-based model for both development and monitoring of standards
  - Some stakeholders describe the one-size-fits-all ARS Program increases the regulatory burden
  - Stakeholders suggest embedding a risk-based framework in AESO decision making
  - Stakeholders recommend to incorporate the risk-based approach in the audit process

- The AESO agrees that a more comprehensive and transparent risk-based approach would allow industry to focus on the highest reliability and cyber security risk area demonstrating value to the rate payers
  - Effectively focus resources on the critical issues needed to best improve the reliability and security of the bulk electric system
- The AESO will enhance risk-based approach across the ARS Program Lifecycle. This approach will:
  - Ensure transparency of the risk elements and criteria
  - Be deliberate in risk identification and qualification
  - Take into consideration the unique Alberta-system characteristics and regulatory framework in its risk assessments

- Desired future state
  - The AESO will enable a more comprehensive risk-based approach across its ARS Program Lifecycle by integrating a risk-based criteria/methodology that can be used to make transparent decisions in adopting, implementing and monitoring standards
- Bridging the gap
  - Develop risk-based criteria/methodology for risk assessment
  - The risk-based criteria/methodology will need to be transparent, easy to apply and based on factors that impact grid reliability
  - Apply risk-based criteria/methodology to ARS Program Lifecycle

- ARS Program Lifecycle
  - Risk-based approach criteria/methodology applied throughout the development, implementation and monitoring of standards
- Development
  - Standards development focus is on those standards that address high risk areas and contribute to high reliability impact
  - Focus industry effort on implementing standards in high-risk areas and for facilities that have significant risk to system reliability and security
- Support Implementation
  - Standards implementation to the appropriate level
  - Suitable standards implementation timeframe to mitigate risks
- Compliance Monitoring
  - Risk-assessment informs scope and breadth of compliance monitoring and audit focus

# High-level activities and timelines

Approach	Activities	Expected Timelines
<b>Develop risk-based criteria / methodology that can be used to make transparent decisions in adopting, implementing and monitoring standards</b>	1. Review and assess NERC risk assessment criteria and methodology for consideration in the Alberta market	By Q3 2022
	2. Develop risk-based criteria/methodology for risk assessment based on review and assessment of NERC	By Q3 2022
	3. Consult with stakeholders on proposed risk-based criteria/methodology for risk assessment	By Q4 2022
	4. Refine and finalize risk-based criteria/methodology for risk assessment	By Q4 2022
	5. Define how risk-based criteria/methodology will be applied across the existing ARS Program Lifecycle	By Q2 2023
	6. Apply risk-based criteria/methodology to the ARS Program Lifecycle	2023 onward
	7. Adjust criteria/methodology if necessary for future ARS Program Lifecycle needs	Post-2023

# Enhancements to Reliability Standards Related Processes

- Enhance alignment to NERC
  - Improve synchronization with NERC versions, in particular with the CIP standards
    - Alignment to NERC versions can avoid duplications
  - Increase alignment to NERC – approach, definitions, standards as follows
    - Align more closely with NERC standard wording, definitions, and terminology,
    - Provide rationale when deviating from NERC
- Standard Development approach improvements
  - Provide rationale, benefits and risks on AESO's standards adoption or retirement
  - Improve the standards development process to increase transparency and reduce complexity

- The AESO recognizes efficiency gains can be achieved with closer alignment with NERC's approach, definitions and standards
  - The AESO agrees that moving to versions more in line with NERC can mitigate reliability and security risks
  - The AESO is cognizant of feedback on substantial costs associated with implementation of new versions of reliability standards
  - The AESO notes that sometimes Alberta variances are needed due to AES' unique operating characteristics, Alberta's regulatory framework, and the AESO's mandate
  - The AESO agrees that increasing and evolving threats, such as supply chain vulnerabilities, requires the AESO and market participants to keep pace with minimum security baselines provided by updated CIP standards
- The AESO agrees there is room for improvement in the Reliability Standards related processes to improve efficiency and transparency

- **Desired future state**
  - Improved Reliability Standards related processes to reduce complexity and increase transparency
  - Increased alignment to NERC's definitions and standards; in instances where Alberta's unique system characteristics and regulatory framework requires an Alberta-specific variance we will improve clarity on why we propose deviations
  - Improved alignment with NERC versions of the reliability standards, including alignment with the latest NERC versions of the CIP standard
- **Bridging the gap**
  - Identify areas in lifecycle processes, definition, standards, and guidance material, where improvements can be made
  - Communicate findings to stakeholders, and request feedback on proposed changes to ARS approach, processes, definitions, and standards
  - Initiate a collaborative process to adopt new and updated NERC CIP standards suitable for Alberta
  - Determine and apply prioritization of standards alignment to NERC

- ARS Program Lifecycle
  - Develop the next set of CIP standards in collaboration with stakeholders with closer alignment to NERC
- Development
  - The ARS development process will have reduced complexity and greater transparency allowing stakeholders to focus on areas with greater impact.
  - ARS under development will better align to NERC standard drafting and definitions, where appropriate
- Support Implementation
  - Opportunities to enhance alignment to NERC to leverage on current practices, supporting material and “CIP ecosystem” where appropriate
- Compliance Monitoring
  - Risk-based approach embedded in the Compliance Monitoring Program

# High-level activities and timelines

Approach	Activities	Expected Timelines
<b>Improve Reliability Standards Related Processes to reduce complexity and increase transparency</b>	1. Conduct gap analysis between NERC and AESO approach to reliability standards and identify areas where better alignment to NERC is recommended in AESO ARS approach, processes, standards, and definitions.	By Q3 2022
	2. Communicate findings to stakeholders, and request feedback on proposed changes to ARS approach, processes, definitions, and standards	By Q4 2022
	3. Initiate a collaborative process to adopt new and updated NERC CIP standards suitable for Alberta	By Q1 2023
	4. Implement enhanced approach to aligning to NERC versions, including NERC versions of the CIP standards	By Q2 2023
	5. Implement enhanced approach to ARS approach, processes, definitions, and standards drafting to all new standards under development	2023 onward

Q&A

# Supporting Information and Guidance Materials

- Stakeholders suggested enhancements to the Alberta reliability standards supporting information and guidance materials
  - Include guidance materials and compliance expectations in the scope of standards development consultation discussions
  - Improve the clarity of supporting information available for stakeholders
  - Include examples and formats of compliance monitoring expectations
  - Provide clarity on when, and which versions, of NERC guidance applies
  - Adopt NERC White Papers and learnings from other jurisdictions

- All feedback received related to supporting information and guidance material will be considered in developing our approach to enhance the ARS supporting information and guidance material
- As the feedback related to adopting approaches taken by other jurisdictions, further review and research is needed by the AESO to better understand what other jurisdictions are doing prior to determining its appropriateness
- The AESO notes that, given its regulatory framework and mandate, it is often difficult to unequivocally support all NERC guidance; however, the AESO plans to improve its consistency and clarity on how and when NERC guidance material can be relied on by stakeholders

- Desired future state
  - Enhanced approach to supporting information and guidance materials to improve clarity and timeliness of materials
- Bridging the gap
  - Review and assess best practices from other jurisdictions
  - Identify and assess opportunities to leverage NERC materials
  - Develop an enhanced approach to provide greater clarity and improved timeliness for supporting information and guidance materials
  - Apply this enhanced approach to guidance related to both existing and future standards

- **ARS Program Lifecycle**
  - Apply improved approach to supporting information and guidance material throughout the development, implementation and monitoring of standards, including consistent and clear referencing to NERC guidance material
- **Development**
  - Develop new and amended supporting information and guidance material during the development of new and amended Alberta reliability standards, including information documents and RSAWs
  - Create opportunities for stakeholders to provide input on the content of the supporting information and guidance materials
- **Support Implementation**
  - Improve existing supporting information and guidance materials to align with new approach
- **Compliance Monitoring**
  - Incorporate lessons learned into supporting information and guidance materials that result from the compliance monitoring program

# High-level activities and timelines

Approach	Activities	Expected Timelines
<b>Develop an enhanced approach to provide greater clarity and improved timeliness for supporting information and guidance materials</b>	1. Review and assess best practices from NERC and other jurisdictions to providing supporting information and guidance materials	By Q1 2023
	2. Identify and assess opportunities to better leverage NERC guidance materials in an enhanced approach	By Q1 2023
	3. Develop enhanced approach for supporting information and guidance materials based on assessment	By Q2 2023
	4. Consult with stakeholders on enhanced approach	By Q2 2023
	5. Refine and finalize enhanced approach	By Q3 2023
	6. Apply enhanced approach to all new standards under development	By Q4 2023 onward
	7. Apply enhanced approach to all existing standards	By Q4 2023 onward

# ARS Program Work Plan

- Improve the ARS Program work plan
  - Stakeholders voiced concerns with the current ARS Program work plan and proposed several recommended changes to the work plan, including:
    - Establish criteria and provide rationale for the ARS development prioritization
    - Provide and keep to target dates for all ARS development and implementation that considers budget cycles
  - Stakeholders suggested that these recommended changes create certainty to allow for more effective planning of resources and budgets

- All feedback received will be considered; however, the AESO will be balancing the request that all deliverable target dates be provided, with the request for firm dates
- The AESO agrees that improvements to the transparency of the ARS program development prioritization could be made and will address this request in the updated work plan
- The AESO is glad that stakeholders find this tool useful for budget planning purposes and will aim to provide latest target dates to assist stakeholders where possible
- The AESO understands that it is difficult for stakeholders to plan when AESO's target dates move and will investigate ways to make improvements

- Desired future state
  - Enhanced ARS Program Work Plan to improve clarity and transparency
- Bridging the gap
  - Develop and provide interim solution
  - Consult with stakeholders on enhanced work plan template
  - Refine and apply enhanced work plan format incorporating outcomes from ARS Roadmap activities

- ARS Program Lifecycle
  - Apply learnings from the entire ARS program development lifecycle into the ARS Program Work Plan
- Development
  - Create an ARS program work plan that contains:
    - Rationale for the ARS program prioritization, which incorporates outcomes of the risk-based approach
    - Target dates for key milestones for each ARS under development, based on the enhanced ARS development process with input from stakeholders at TWGs
- Support Implementation
  - Apply lessons learned from implemented standards to improve the ARS development process timelines
- Compliance Monitoring
  - Apply lessons learned from the compliance monitoring program to the ARS development process timelines and prioritization

Approach	Activities	Expected Timelines
<b>Enhance ARS Program Work Plan</b>	1. Develop and provide an interim solution	By Q2 2022
	2. Develop and provide enhanced work plan template	By Q4 2022
	3. Consult with stakeholders on proposed work plan template	By Q1 2023
	4. Refine and finalize enhanced work plan template	By Q2 2023
	5. Apply enhanced work plan template incorporating outcomes from risk-based approach to prioritization of ARS	By Q3 2023
	6. Incorporate all applicable standards under development into enhanced work plan template and work with TWGs to update specific ARS schedules, as needed	By Q4 2023 onward

# Stakeholder Engagement and Discussion

- Stakeholders recommended increased opportunities for stakeholder engagement and discussion through
  - Resumption of ARCDG and technical working groups (TWG) to:
    - Provide two-way dialogue
    - Support enhanced opportunities for stakeholders to:
      - *Discuss and ask questions in the development phase of standards,*
      - *Acquire better understanding of technical requirements,*
      - *Seek feedback on compliance expectation and the intent of the AESO compliance monitoring program information requests*
    - Review lessons learned
  - Increased opportunities for broad industry discussions with the AESO development and compliance monitoring groups, MSA, and other stakeholders

- The feedback received related to increasing opportunities stakeholder engagement and will be considered in developing our approach:
  - To re-establish an ARC-DG type meeting, which will use as a venue for increased opportunities for broad industry discussion
  - To re-establish TWGs as required, which the AESO sees as a venue to discuss specific reliability standards
- All stakeholder engagement will be open, which will allow for broader industry discussions as requested. Participants that are interested in attending can self select
- The AESO is also considering how to best incorporate more opportunities for stakeholder engagement, throughout the ARS Program Lifecycle, with the AESO's development and external compliance monitoring program teams

- Desired future state
  - Increased opportunities for stakeholder engagement with a more coordinated approach to the various touch points we have with stakeholders over the ARS Program Lifecycle
- Bridging the gap
  - Establish recurring Reliability Standards Discussion Group (RSDG) meeting to support enhanced two-way dialogue on work plans, proposals, and initiatives related to the ARS Program Lifecycle
  - Establish TWGs and hold sessions, as needed, to increase two-way dialogue on standards throughout the ARS Program Lifecycle

- ARS Program Lifecycle
  - Apply increased opportunities for enhanced stakeholder engagement throughout the development, implementation and monitoring of standards
- Development
  - Host regular RSDG meetings to present and to receive stakeholder feedback on the ARS program work plan
  - Host TWG meetings, as needed, to discuss specific ARS under development
- Support Implementation
  - Host TWG meetings, as needed, to discuss implementation questions and concerns
- Compliance Monitoring
  - Host TWG meetings, as needed, to discuss specific questions and concerns about compliance expectations

Approach	Activities	Expected Timelines
<b>Increase opportunities for stakeholder engagement</b>	1. Develop overarching proposed approach to RSDG and TWGs meetings (including purpose, scope and frequency)	By Q2 2022
	2. Host RSDG meeting and seek stakeholder feedback on proposed RSDG and TWGs approaches	By Q2 2022
	3. Refine and finalize RSDG and TWGs proposed approaches	By Q3 2022
	4. Host RSDG meetings (based on agreed to frequency); Host TWGs as required	By Q4 2022 onward
	5. Provide regular progress updates to share progress on the ARS Program Enhancements Roadmap activities and provide an opportunity to address stakeholder questions and seek stakeholder input	By Q1 2023 onward

Q&A

# Compliance Monitoring Program and Processes

- Enhance Compliance Monitoring Program (CMP) and processes
  - Incorporate risk-based factors to focus compliance engagement on requirements with higher reliability risk
  - Facilitate efficiency and allow for more preparation time
  - Provide recommendations in audit report; assess the adequacy of mitigation plans; incorporate more efficient tools to address administrative contraventions (e.g., NERC's Compliance Exception (CE) and Find, Fix, Track (FFT) tools)
  - Desire compliance expectations to be discussed earlier in the process

- Risk-based approach is the most important feedback related to improving the CMP
- Indicates MPs wide support to NERC's risk-based CMEP
- Opportunities to increase the effectiveness and efficiency of current processes
- Increased support in ensuring that the standards are properly implemented
- The process of addressing the contraventions aligned with whether they are administrative
- Opportunities to discuss compliance expectations during standards development

- Desired future state
  - Risk-based CMP integrates a risk-based criteria/methodology into its tools, scope and schedules
  - Short-term actions implemented to facilitate efficiency of audit processes and allow for more preparation time
  - Compliance assessments support standards implementation and compliance readiness
  - Discussion of compliance expectations integrated into standards development process

- Bridging the gap
  - Develop a process/methodology to incorporate risk elements into compliance monitoring
  - Update CMP to reflect the risk-based approach
  - Complete CMP short-term actions
    - Implement scope reduction and defer audits in 2022 Audit Program
    - Streamline reporting on audit assessments
    - Extend the submissions timelines for audit and self-certification to 90 days
    - Apply NERC sampling methodology
    - Information Requests timelines reflect the complexity and volume of the audit scope
  - Evaluate whether to increase the level of details provided in AESO's assessment and AESO's comment sections of the audit report
  - Consider removal of the identify, assess and correct wording from the CIP standards during standard development process

- Focus on standards with highest risk to system's reliability
- Align the compliance monitoring assessments' scope and frequency with risk elements
- Allow more time for preparing the submissions (self-certification, audit evidence and Information Request responses)
- Relief provided to MPs SMEs to focus on reliability
- Reduce the administrative burden

- Enforcement related topics
  - Assess the adequacy of the mitigation plans
  - Compliance Exceptions
  - Find, Fix and Track
- Provide recommendations in the audit report

# High-level activities and timelines

Approach	Activities	Expected Timelines
<p><b>The CMP will enable a risk-based approach by integrating a risk-based criteria / methodology into its tools, scope and schedules</b></p>	<p>1. Implement short-term actions to enhance CMP assessment and audit reporting processes</p>	<p>By Q4 2022</p>
	<p>2. Develop draft risk-based CMP which incorporates risk elements and stakeholders' input</p>	<p>By Q3 2023</p>
	<p>3. Refine and finalize risk-based CMP</p>	<p>By Q4 2023</p>
	<p>4. Begin implementation</p>	<p>2024</p>
	<p>5. Adjust CMP and processes if necessary for future ARS Program Lifecycle needs</p>	<p>2025 onward</p>

Q&A

## Next Steps and Session Close-Out

- Immediate next steps
  - Alberta Reliability Council (ARC) executive strategic meeting by end of May / beginning of June
  - Reliability Standards Discussion Group (RSDG) launch on June 9, 2022
  - Stakeholder feedback on draft ARS Roadmap due by June 10, 2022
  - ARS Roadmap refinement and finalization by September 2022
- Focus for 2022
  - Developing and implementing risk-based criteria and a reliability assessment methodology
  - Reviewing and revising our internal processes
  - Piloting changes throughout ARS Program Lifecycle
  - Implementing short-term actions

- We want to thank you for attending the ARS Program Enhancements Stakeholder Engagement Session and we would appreciate your feedback on the session
- Launch poll
  - The purpose of the session was clear
  - The information was presented in a clear manner
  - The presentation content was clear and informative
  - I found this session valuable

- We invite all interested stakeholders to provide their input on this session and the roadmap via the questions set out in the Stakeholder Comment Matrix ARS Program Enhancements Draft Roadmap on or before June 10, 2022. The comment matrix is available on our website at [www.aeso.ca](http://www.aeso.ca)
  - Path: Rules, Standards and Tariff > Alberta Reliability Standards > ARS Development & Monitoring



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