



September 30, 2010

Dear Market Participants and Interested Parties:

**Re: Letter of Notice – COM-002-AB-2 Communications and Coordination**

**Communication (“COM”) Reliability Standard COM-002-AB-2 “Communications and Coordination” Proposed for Adoption as Alberta Reliability Standard (the “Proposed Reliability Standard”)**

Section 19 of the *Transmission Regulation* requires the Alberta Electric System Operator (“AESO”) to consult with market participants 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 standard to the Alberta Utilities Commission (“Commission”) for review along with the AESO’s recommendation that the Commission approve or reject them.

Accordingly, the AESO is providing notice and seeking comments from market participants on the attached Proposed Reliability Standard.

Following the AESO’s receipt of and reply to comments from market participants regarding the Proposed Reliability Standard, the AESO intends to finalize the Proposed Reliability Standard and forward it to the Commission for review and approval as a reliability standard that applies in Alberta.

**Applicability of the Proposed Reliability Standard**

The Proposed Reliability Standard is applicable to:

- the operator of a transmission facility;
- the legal owner of an aggregated generating facility;
- the operator of a generating unit; and
- the AESO.

**Summary of the Proposed Reliability Standard**

The purpose of this reliability standard is to ensure the AESO and each operator of a transmission facility, the legal owner of an aggregated generating facility and operator of a generating unit have adequate and effective communications and response capabilities available for addressing a real-time system emergency condition.

The Proposed Reliability Standard has been amended to contain certain “Alberta variances” from the NERC standards. These variances have been included to ensure the Proposed Reliability Standard properly aligns with the industry structure in Alberta and is capable of being applied in Alberta. A summary of these variances are as follows:



- a) A new Alberta requirement, R5, was added to this reliability standard to recognize that the responsibility to repeat the information in a verbal AESO directive back to the AESO correctly rests with the recipient of the directive.

Further, and with regard to certain requirements of the Proposed Reliability Standard, reference will be made in the Alberta Reliability Standards section of the AESO website to documents with related requirements in order to inform applicable entities of the existence of such requirements.

Finally, as part of the AESO's process to adopt Alberta reliability standards, the Proposed Reliability Standard has been amended to change passive terms such as "shall" to "must", to apply a consistent writing style, to clarify requirements, and to ensure that measures are appropriately aligned with requirements. In addition, defined terms now appear in bold font rather than italics; and the use of acronyms is limited to the ISO and the WECC with all other defined terms being written out in full.

### **Separate Consultation on New ISO Rule 502.4 Voice and Data Communication System Requirements and Removal of Related ISO Rules and OPPs**

Proposed new ISO rules Section 502.4 – "Voice and Data Communication System Requirements" replaces the authoritative provisions from the AESO's existing Operational Voice Communication Standard and ISO OPP 1203 – "Emergency Voice Communication Testing". To eliminate duplication with the proposed new ISO rules Section 502.4 and related proposed Alberta Reliability Standards COM-001-AB-1.1 and COM-002-AB-2, the AESO is also proposing to remove ISO rules subsections 6.2.1, 6.2.2 and 6.2.3.

Therefore, implementation of new ISO rules Section 502.4 will result in the removal of the following ISO OPPs and ISO rules:

- OPP 003.3 – Automated Dispatch and Messaging System (ADAMS);
- OPP 1203 – Emergency Voice Communication Testing;
- Confidential OPP 1203 – Emergency Voice Communication Testing; and
- ISO rules subsections 6.2.1, 6.2.2 and 6.2.3.

Implementation of new ISO rules Section 502.4 will also result in amendments to ISO OPP 806.

New ISO rules Section 502.4, and amendments to and the removal of the related ISO OPPs and ISO rules are being consulted on separately pursuant to the Commission Rule 017. ([Click here](#) to view the Letter of Notice for the New ISO Rule 502.4 Changes dated September 30, 2010).

### **Implementation of Alberta Reliability Standards**

All reliability standards proposed for approval or rejection by the AESO are based on the reliability standards and definitions developed, or approved, and enforced by the North American Electric Reliability Corporation ("NERC"). NERC was certified as the Electric Reliability Organization ("ERO") for the United States by the Federal Energy Regulatory Commission ("FERC") under the US *Energy Policy Act of 2005*. NERC has been granted



recognition as the ERO by the Minister of Energy in Alberta pursuant to Section 20 of the *Transmission Regulation*.

In accordance with Section 19 of the *Transmission Regulation*, the reliability standards that apply in Alberta are those of the ERO or any other reliability standards to the extent that such reliability standards are adopted by the AESO after consultation with market participants and after receipt of Commission approval.

Further information regarding the AESO's adoption of reliability standards is available on the AESO website at <http://www.aeso.ca/rulesprocedures/17004.html>.

### **AESO Papers and Other Related Communications**

The AESO has not issued any AESO papers or other related communications with respect to the Proposed Reliability Standard.

### **Request for Stakeholder Comments**

Comments and suggestions on the Proposed Reliability Standard are encouraged.

The attached Stakeholder Comparison Comment Rationale Matrix sets out the following:

- a) the complete text of COM-002-2, with the exception of the compliance section D. The Alberta reliability standards do not contain a compliance section. Compliance with all Alberta reliability standards is completed in accordance with the Alberta Reliability Standards Compliance Monitoring Program, available on the AESO website at: <http://www.aeso.ca/loadsettlement/17189.html>. For information, a link is provided to NERC compliance section D in the Stakeholder Comparison Comment Rationale Matrix;
- b) the proposed Alberta requirements and measures;
- c) the AESO's rationale with regard to any Alberta variances or other modifications to the NERC wording;
- d) a 'stakeholder comments' section to be used by market participants when providing written comments to the AESO; and
- e) an 'AESO replies' section that will be used by the AESO to respond to comments received from market participants, if any.

Please use the attached Stakeholder Comparison Comment Rationale Matrix when submitting comments to the AESO on the Proposed Reliability Standard. Only written comments will be considered by the AESO in finalizing the Proposed Reliability Standard.



Please provide written stakeholder comments or questions by **October 29, 2010** to Neil Curtis at [ars\\_comments@aeso.ca](mailto:ars_comments@aeso.ca).

### **AESO Replies to Stakeholder Comments**

The AESO will be publishing all stakeholder comments received for industry review shortly after the comment deadline. Stakeholder Comments received along with AESO replies to the comments will be published with the final proposed Reliability Standards in October, 2010.

In the event that the AESO does not receive comments from stakeholders regarding the Proposed Reliability Standard, the AESO will not provide a reply and is expecting to file the Proposed Reliability Standard with the Commission on November 29, 2010.

### **Attachments to Letter of Notice**

The [Stakeholder Comparison Comment Rationale Matrix](#) is attached to this Letter of Notice:

The full text of all NERC reliability standards, is available on the NERC website: <http://www.nerc.com/page.php?cid=2|20>

### **Proposed Effective Date**

The AESO proposes that the Proposed Reliability Standard becomes effective one hundred and eighty (180) calendar days after the date the Commission approves it.

Yours sincerely,

*Original Signed By*

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Attachments