



March 18, 2010

Dear Market Participants and Interested Parties:

Re: AESO Reply to Stakeholder Comments - Proposed Level I Removal of OPP 808 Sabotage Reporting (“OPP 808 Removal”)

In accordance with Alberta Utilities Commission (“AUC” or “Commission”) Rule 017, please find attached the AESO reply to stakeholder comments regarding the OPP 808 Removal. The proposed OPP 808 Removal being recommended for internal AESO approval in March of 2010 is attached. Please note that the OPP 808 Removal was initially distributed for consultation on February 25, 2010.

Transition of Authoritative Documents (“TOAD”) Reforms

The OPP 808 Removal is the result of the specific changes and reforms with respect to the TOAD project. The AESO is proposing to eliminate duplication, address conflicts and gaps and improve clarity among and within its three authoritative document domains: the ISO rules, the ISO tariff and the Alberta Reliability Standards. Information on the TOAD project can be found on the AESO website at www.aeso.ca.

Elimination of Duplication in Alberta Reliability Standards

OPP 808 was reviewed in conjunction with Alberta Reliability Standard CIP-001-AB-1. It was determined the authoritative components of OPP 808 contained unnecessary duplication, and that the subject matter was appropriately and adequately contained in Alberta Reliability Standard CIP-001-AB-1. OPP 808 will be withdrawn in its entirety, leaving only Alberta Reliability Standard CIP-001-AB-1 as setting out the sabotage reporting requirements for market participants.

AESO Reply to Stakeholder Comments

The AESO is required to provide a reply to market participant comments pursuant to Section 8 of the Alberta Utilities Commission (“Commission”) Rule 017. [Click here](#) to access the comment-reply matrix for the OPP 808 Removal.

The proposed removal of OPP 808 – Sabotage Reporting eliminates overlap with provisions sets out in Alberta Reliability Standard CIP-001-AB-1 coming into effect on April 12, 2010. Stakeholder comments were received and those comments suggested that the AESO set out procedures for communicating sabotage information to market participants in an Information Document.

In responding to stakeholder comments the AESO concurred that it would be beneficial to set out the procedures for communicating sabotage information in an Information Document and is targeting to have the Information Document completed by June 2010.



In light of the above, after careful consideration of the comments received from market participants, the AESO has determined that the OPP 808 Removal will continue as proposed.

For ease of reference, the following Table is hyperlinked to provide assistance in directing stakeholders to the summary of the OPP 808 Removal and the attachments. The attached summary provides more information on the proposed OPP 808 Removal, including a brief explanation of the reason why OPP 808 should be removed.

Rule Number	Description	Level	Most relevant stakeholder interest
OPP 808	Sabotage Reporting	I	All Market Participants

Pursuant to Section 9 of Commission Rule 017, please note the following:

1. The AESO will be filing the OPP 808 Removal with the Commission on April 5, 2010.
2. Market Participants, as defined in the *Electric Utilities Act* (“EUA”), may object to an ISO rule filed with the Commission within 10 days of the publication by the Commission of the notice of filing of the ISO rule, in accordance with Section 20.4 of the EUA; and
3. The OPP 808 Removal is proposed to be effective on April 22, 2010.

Yours sincerely,

“original signed by”

Paul Glatthor
Manager, Authoritative Documents Process
Ph: (403) 539-2464
E-mail: paul.glatthor@aeso.ca



Final Proposed LEVEL II ISO Rule Changes

Level II changes are changes that are expected to have a moderate or low impact on the industry or the ISO, and generally require little or no effort by stakeholders for implementing a solution. They are provided to stakeholders to review to ensure that the expected impact is reasonable, to identify unrealized impacts and/or to provide notice of the potential change in administrative processes.

OPP 808 – Sabotage Reporting	
Rule Section/Number	Part 3, OPP 808 Sabotage Reporting
Summary of ISO Rule	OPP 808 sets out policies and defines responsibilities and procedures to identify and report sabotage and cyber sabotage incidents, confirmed or suspected, that could affect the operation of the Alberta Interconnected Electric System.
Reason for Removal	The AESO proposes to remove OPP 808 as the authoritative components of OPP 808 are appropriately contained in the Alberta Reliability Standard CIP-001-AB-1.
Level	I
Explanation of Confidentiality	None
Proposed Effective Date	April 22, 2010
AESO Contact	Regulatory Services, Evelyn Kelly, evelyn.kelly@aeso.ca , (403) 539-2468
Attachments	See attached: Rationale Document for Final Removal of OPP 808