



**Stakeholder Comparison Comment Rationale Matrix**

**2010-09-30**

**AESO AUTHORITATIVE DOCUMENT PROCESS**

**Alberta Reliability Standard – COM-002-AB-2 Communications and Coordination**

*NOTE: The AESO is asking market participants to give an initial indication of their support for, or opposition to, the specific Alberta Reliability Standard variances to the NERC requirements referenced below. Such an initial indication assists in the AESO’s practical understanding of the receptivity of the industry to the proposed changes, and in that regard the AESO thanks, in advance, all market participants who choose to respond. With regard to the specific standard changes and their implications, such responses are without prejudice to the rights of market participants under the Act, any regulations, or related decisions of the Commission.*

Date of Request for Comment [yyyy/mm/dd]: <u>2010/09/30</u> Period of Consultation [yyyy/mm/dd]: <u>2010/09/30</u> through <u>2010/10/29</u> Comments From: <u>ATCO Power</u> Date [yyyy/mm/dd]: <u>2010/10/29</u>	Contact: <u>Mary Dylke</u> Phone: <u>403-245-7521</u> E-mail: <u>Mary.dylke@atcopower.com</u>
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*Listed below is the summary of changes for the proposed new, removed or amended sections of the standard. Please refer back to the Letter of Notice under the “Attachments to Letter of Notice” section to view the proposed content changes to the standard. Please double-click on the check box for either “Support” or “Oppose” and/or place your comments, reasons for position, and alternate proposals underneath (if any).*

COMPARISON BETWEEN NERC COM-002-2 AND ALBERTA COM-002-AB-2

Communications and Coordination

NERC COM-002-2	Alberta COM-002-AB-2	AESO Reason for Difference	Stakeholder Comments	AESO Replies
<p><b>Purpose</b> To ensure Balancing Authorities, Transmission Operators, and Generator Operators have adequate communications and that these communications capabilities are staffed and available for addressing a real-time emergency condition. To ensure communications by operating personnel are effective.</p>	<p><b>Purpose</b> The purpose of this <b>reliability standard</b> is to ensure the <b>ISO</b>, the <b>operator</b> of a <b>transmission facility</b>, the <b>legal owner</b> of an <b>aggregated generating facility</b> and the <b>operator</b> of a <b>generating unit</b> have adequate and effective communications and response capabilities available for addressing a real-time <b>system emergency</b> condition.</p>	<p>Clarified the purpose to align with the content of the reliability standard.</p>	<p>ATCO suggests that this standard is not applicable to “legal owner of an aggregated generating facility”. This standard most appropriately would apply to the facility operator.</p>	
<p><b>Applicability</b> 4.1. Reliability Coordinators. 4.2. Balancing Authorities. 4.3. Transmission Operators. 4.4. Generator Operators.</p>	<p><b>Applicability</b> This <b>reliability standard</b> applies to:</p> <ul style="list-style-type: none"> <li>the <b>operator</b> of a <b>transmission facility</b>;</li> <li>the <b>legal owner</b> of an <b>aggregated generating facility</b>;</li> <li>the <b>operator</b> of a <b>generating unit</b>; and</li> <li>the <b>ISO</b>.</li> </ul>	<p><input type="checkbox"/> New <input checked="" type="checkbox"/> Amended <input type="checkbox"/> Deleted</p> <p>Amended to identify the responsible entities in Alberta.</p>	<p><input type="checkbox"/> Support <input type="checkbox"/> Support with language suggestions <input type="checkbox"/> Oppose</p> <p><i>Insert Comments / Reason for Position (if any), and alternate proposal (if any).</i></p> <p>ATCO suggests that this standard is not applicable to “legal owner of an aggregated generating facility”. This standard most appropriately would apply to the facility operator.</p>	
<p><b>Effective Date</b> January 1, 2007</p>	<p><b>Effective Date</b> One hundred and eighty (180) <b>days</b> after the date the <b>Commission</b> approves it.</p>	<p>To allow a reasonable amount of time for Alberta entities to implement this Alberta Reliability Standard.</p>	<p><input type="checkbox"/> Support <input type="checkbox"/> Support with language suggestions</p>	

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			<input type="checkbox"/> Oppose  Due to the relatively high number of standards that the AESO is planning to implement over a fairly short period of time, ATCO Power suggests careful consideration be given to effective dates.  ATCO Power previously suggested a minimum effective date of 180 days following approval for any standard and, depending on the complexity of the implementation process required for a particular standard, and the number of other standards with implementation periods that overlap, more time may be required.  ATCO appreciates that the AESO has proposed an effective implementation date of 180 days following AUC approval of the standard and in this case, 180 days is likely appropriate. However, this should be cross-checked with other standards expected to be implemented in the same time period to ensure implementation is attainable for all	

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**Communications and Coordination**

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<p><b>R1.</b> Each Transmission Operator, Balancing Authority, and Generator Operator shall have communications (voice and data links) with appropriate Reliability Coordinators, Balancing Authorities, and Transmission Operators. Such communications shall be staffed and available for addressing a real-time emergency condition.</p> <p><b>R1.1.</b> Each Balancing Authority and Transmission Operator shall notify its Reliability Coordinator, and all other potentially affected Balancing Authorities and Transmission Operators through predetermined communication paths of any condition that could threaten the reliability of its area or when firm load shedding is anticipated.</p>	<p><b>R1</b> Each <b>legal owner</b> of an <b>aggregated generating facility</b> must have voice and data communication between its <b>operator</b> and any <b>operator</b> of a <b>transmission facility</b> to which it is connected and with the <b>ISO</b>.</p> <p><b>R2</b> The <b>ISO</b>, each <b>operator</b> of a <b>transmission facility</b> and each <b>operator</b> of a <b>generating unit</b> must have personnel available for all hours of the <b>day</b>, seven (7) <b>days</b> a week, to receive and address any voice or data communication regarding a real-time <b>system emergency</b> condition.</p> <p><b>R3</b> The <b>ISO</b> must notify the <b>WECC</b> Reliability Coordinator, adjacent <b>interconnected transmission operators</b> and affected <b>adjacent balancing authorities</b> through predetermined communication paths of any threat to the <b>reliability</b> of the <b>interconnected electric system</b> or if the <b>ISO</b> anticipates shedding firm <b>load</b>.</p>	<p><input type="checkbox"/> New <input checked="" type="checkbox"/> Amended <input type="checkbox"/> Deleted</p> <p>Amended for clarity and consistency.</p> <p>TFO and AESO requirements of NERC R1 have been covered in proposed Alberta Reliability Standard COM-001-AB-1.1.</p> <p>NERC sub-requirement R1.1 not included in proposed Alberta Reliability Standard COM-001-AB-1.1 as it is included as requirement R3 of reliability standard EOP-002-AB-2: “<b>R3</b> The <i>ISO</i> must communicate its current and its forecast of future system conditions to the <i>VRC</i> and <i>adjacent balancing authorities</i> during a supply shortfall event.”</p>	<p>standards.</p> <p>= Support <input type="checkbox"/> Support with language suggestions <input type="checkbox"/> Oppose</p> <p><i>Insert comments, reason for position, and alternate proposal (if any).</i></p> <p>R1: ATCO suggests that this standard is not applicable to “legal owner of an aggregated generating facility”. This standard most appropriately would apply to the facility operator.</p> <p>R2: Having personnel available 24/7 is reasonable, but not all communications recipients and methods are available 24/7. Email recipients sleep, take vacations, and change roles. Internet-based communications may be down in an emergency. The communications endpoints that are to have 24/7 availability should be specified precisely.</p>	
<p><b>R2.</b> Each Reliability Coordinator, Transmission Operator, and</p>	<p><b>R4</b> The <b>ISO</b> must give a verbal <b>directive</b> to an <b>operator</b> of a</p>	<p><input type="checkbox"/> New</p>	<p><input type="checkbox"/> Support <input type="checkbox"/> Support with language</p>	

COMPARISON BETWEEN NERC COM-002-2 AND ALBERTA COM-002-AB-2

Communications and Coordination

NERC COM-002-2	Alberta COM-002-AB-2	AESO Reason for Difference	Stakeholder Comments	AESO Replies
<p>Balancing Authority shall issue directives in a clear, concise, and definitive manner; shall ensure the recipient of the directive repeats the information back correctly; and shall acknowledge the response as correct or repeat the original statement to resolve any misunderstandings.</p>	<p><b>transmission facility, legal owner of an aggregated generating facility and operator of a generating unit</b> in a clear, concise and definitive manner. If the recipient of the verbal <b>directive</b> does not respond by repeating the information in the <b>directive</b> as specified in requirement R5, then the <b>ISO</b> must request the recipient to repeat the information in the <b>directive</b>. If the information is repeated correctly, the <b>ISO</b> must verbally acknowledge this to the recipient. If the information in the response is not correct, the <b>ISO</b> must repeat the verbal <b>directive</b> and the above process until the ISO is satisfied that the recipient understands the information in the <b>directive</b>.</p>	<p><input checked="" type="checkbox"/> Amended <input type="checkbox"/> Deleted</p> <p>Amended for clarity and consistency.</p>	<p>suggestions <input type="checkbox"/> Oppose</p> <p><i>Insert comments, reason for position, and alternate proposal (if any).</i></p> <p>R4: ATCO suggests that this standard is not applicable to “legal owner of an aggregated generating facility”. This standard most appropriately would apply to the facility operator.</p>	
	<p><b>R5</b> Each <b>person</b> who receives a verbal <b>directive</b> from the <b>ISO</b> must repeat the information in the verbal <b>directive</b> back to the <b>ISO</b> correctly, either in response to the initial verbal <b>directive</b> or in response to the <b>ISO’s</b> repetition of the verbal <b>directive</b>.</p>	<p><input checked="" type="checkbox"/> New <input type="checkbox"/> Amended <input type="checkbox"/> Deleted</p> <p><b>Alberta Variance:</b> The AESO recognizes that the responsibility to repeat the information in a verbal AESO directive back to the AESO correctly rests with the recipient of</p>	<p><input type="checkbox"/> Support <input type="checkbox"/> Support with language suggestions <input type="checkbox"/> Oppose</p> <p><i>Insert comments, reason for position, and alternate proposal (if any).</i></p> <p>Please confirm that with the</p>	

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		<p>the directive. A new requirement, R5, was added to this reliability standard to address this.</p>	<p>revisions described in the AESO's Letter of Notice dated Sep 30/10 relating to "New ISO Rules 502.4 Changes", all references to what is expected in terms of verbal directive response have been removed from all other ISO rules and OPPs.</p> <p>This standard does not identify "person" in the applicability section. ATCO suggests specifying the appropriate applicable entity to remain consistent with the entities identified in the applicability section. "Persons" should not be receiving direction from the AESO, as the definition of "person" is too broad and can include essentially anyone.</p> <p>NERC's COM-002-3 proposes a newly defined term, "reliability directive", which is defined as "A communication initiated by a Reliability Coordinator, Transmission Operator or Balancing Authority where action by the recipient is necessary to address an actual or expected Emergency." ATCO suggests the</p>	

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NERC COM-002-2	Alberta COM-002-AB-2	AESO Reason for Difference	Stakeholder Comments	AESO Replies
<p><b>M1.</b> Each Transmission Operator, Balancing Authority and Generator Operator shall have communication facilities (voice and data links) with appropriate Reliability Coordinators, Balancing Authorities, and Transmission Operators and shall have and provide as evidence, a list of communication facilities or other equivalent evidence that confirms that the communications have been provided to address a real-time emergency condition. (Requirement 1, part 1)</p>	<p><b>MR1</b> Evidence exists of voice and data communication as specified in requirement R1, such as a list of voice and data communication devices.</p> <p><b>MR2.</b> Where a real-time <b>system emergency</b> condition has occurred, evidence exists that demonstrate any voice or data communications were addressed, such as voice recordings and <b>operator</b> logs.</p>	<p><input type="checkbox"/> New  <input checked="" type="checkbox"/> Amended  <input type="checkbox"/> Deleted</p> <p>Amended to align with requirements R1 and R2.</p>	<p>AESO consider using this term and a similar definition to increase the clarity of this requirement.</p> <p><input type="checkbox"/> Support  <input type="checkbox"/> Support with language suggestions  <input type="checkbox"/> Oppose</p> <p><i>Insert comments, reason for position, and alternate proposal (if any).</i></p> <p>MR2: The measurement is misaligned with requirement. Rather than checking that personnel are scheduled 24/7, the measurement duplicates the measures of other requirements that specify what sort of response is required. ATCO suggests referring to schedules showing that staff are on duty 24/7.</p>	
	<p><b>MR3</b> Evidence exists to confirm notification as specified in requirement R3, such as voice recordings, <b>operator</b> logs and email records.</p>	<p><input checked="" type="checkbox"/> New  <input type="checkbox"/> Amended  <input type="checkbox"/> Deleted</p> <p>Added to align with requirement R3.</p>	<p><input type="checkbox"/> Support  <input type="checkbox"/> Support with language suggestions  <input type="checkbox"/> Oppose</p> <p><i>Insert comments, reason for position, and alternate proposal (if any).</i></p>	

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<p><b>M2.</b> The Balancing Authority and Transmission Operator shall have and provide upon request evidence that could include but is not limited to, operator logs, voice recordings or transcripts of voice recordings, electronic communications, or other equivalent evidence that will be used to determine if it notified its Reliability Coordinator, and all other potentially affected Balancing Authorities and Transmission Operators of a condition that could threaten the reliability of its area or when firm load shedding was anticipated. (Requirement 1.1)</p>	<p><b>MR4</b> Evidence exists to verify the requirement as specified in requirement R4 such as, voice recordings, <b>operator</b> logs and email records.</p>	<p><input type="checkbox"/> New  <input checked="" type="checkbox"/> Amended  <input type="checkbox"/> Deleted</p> <p>Amended to align with requirement R4.</p>	<p><input type="checkbox"/> Support  <input type="checkbox"/> Support with language suggestions  <input type="checkbox"/> Oppose</p> <p><i>Insert comments, reason for position, and alternate proposal (if any).</i></p>	
	<p><b>MR5</b> Evidence exists to verify the requirement as specified in requirement R5 such as, voice recordings, <b>operator</b> logs and email records.</p>	<p><input checked="" type="checkbox"/> New  <input type="checkbox"/> Amended  <input type="checkbox"/> Deleted</p> <p>Added to align with requirement R5.</p>	<p><input type="checkbox"/> Support  <input type="checkbox"/> Support with language suggestions  <input type="checkbox"/> Oppose</p> <p><i>Insert comments, reason for position, and alternate proposal (if any).</i></p> <p>This measure will have the effect of requiring all devices to which verbal directives might be delivered to have recording devices. Operator logs would not capture the required repetition. Reference to email records must</p>	

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			<p>be an erratum; email is not verbal communication.</p> <p>For the sole purpose of demonstrating auditable compliance with a requirement, compelling entities to install voice recording capability at all facilities is an excessive expectation. This capability has not been needed or required previously.</p> <p>Further, in the case of an emergency, it is possible that the plant operator would be actively addressing plant issues away from the recorded land line and would be communicating with the System Controller via satellite phone or cell phone, rendering the recorded land line moot.</p> <p>It is consistent with the intent for operator logs to be utilized and the AESO records all incoming and outgoing telephone communication with facilities. Therefore, the AESO has access to all of these records. ATCO suggests the measure be revised to allow AESO voice recordings to be accessed in cases where voice</p>	

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<b>NERC COM-002-2</b>	<b>Alberta COM-002-AB-2</b>	<b>AESO Reason for Difference</b>	<b>Stakeholder Comments</b>	<b>AESO Replies</b>
			recordings are not available from the participant.	
<b>Compliance</b> To view the compliance section D of the NERC reliability standard follow this link: <a href="http://www.nerc.com/files/COM-002-2.pdf">http://www.nerc.com/files/COM-002-2.pdf</a>		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: <a href="http://www.aeso.ca/loadsettlement/17189.html">http://www.aeso.ca/loadsettlement/17189.html</a> .		
<b>Regional Differences</b> None identified.	None identified.	Not applicable in Alberta		

<b>Definitions</b>	<b>Comments</b>	<b>Rationale and/or Alternate Proposal</b>
<b>(a) New</b> N/A		
<b>(b) Removals</b> N/A		
<b>(c) Amendments</b> N/A		