

Stakeholder Comment Form

**Alberta Reliability Standards Process
Proposed New Alberta Reliability Standards**

Date of Request for Comment: September 9, 2009
Period of Consultation: September 9 through October 9, 2009

Comments From: ATCO Power

Reliability Standard Number	Description	Stakeholder Comments
EOP-001-AB-1	Emergency Operations Planning	
CIP-001-AB-1	Sabotage Reporting	<p>This standard and its requirements are substantial. ATCO Power agrees with the AESO's proposed Alberta variance for R1. It is impractical for responsible entities to recognize sabotage events affecting larger portions of the Interconnection. ATCO Power would suggest the AESO consider another change to this standard. As one of a group of standards that make up the Critical Infrastructure Protection standards, we believe sabotage reporting should be applied in the context of protection to critical infrastructure. We see a benefit in first identifying guidelines as to what should be considered a critical asset in Alberta. From the level or degree to which an asset is deemed critical, it should be included into sabotage reporting. ATCO Power is concerned the proposed reliability standard on sabotage reporting as worded would place unnecessary requirements and burdens on some participants outside of their current incident reporting processes. Instead the wording should allow non-critical assets to use their current processes. This would allow a focus on modifications to processes at critical systems and result in a lower cost burden of implementation but still remain effective to serve its intended purpose.</p> <p>ATCO Power is also very concerned with the AESO having two different sources for rules on sabotage reporting. ATCO Power would like the AESO to align this reliability standard with the Transition of Authoritative Documents (TOAD) initiative. We would suggest the AESO apply this reliability standard only to</p>

		themselves and revise OPP 808 to include the additional actions required by others, or as an alternative remove OPP 808 and use only the reliability standard.
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Please return this form with your comments by October 9, 2009, to:

Jason Murray
Manager, Operations Services
E-mail: jason.murray@aeso.ca
Phone: (403) 705-5230
Fax: (403) 705-5252