

Alberta Reliability Standards Stakeholder Session

June 15, 2010

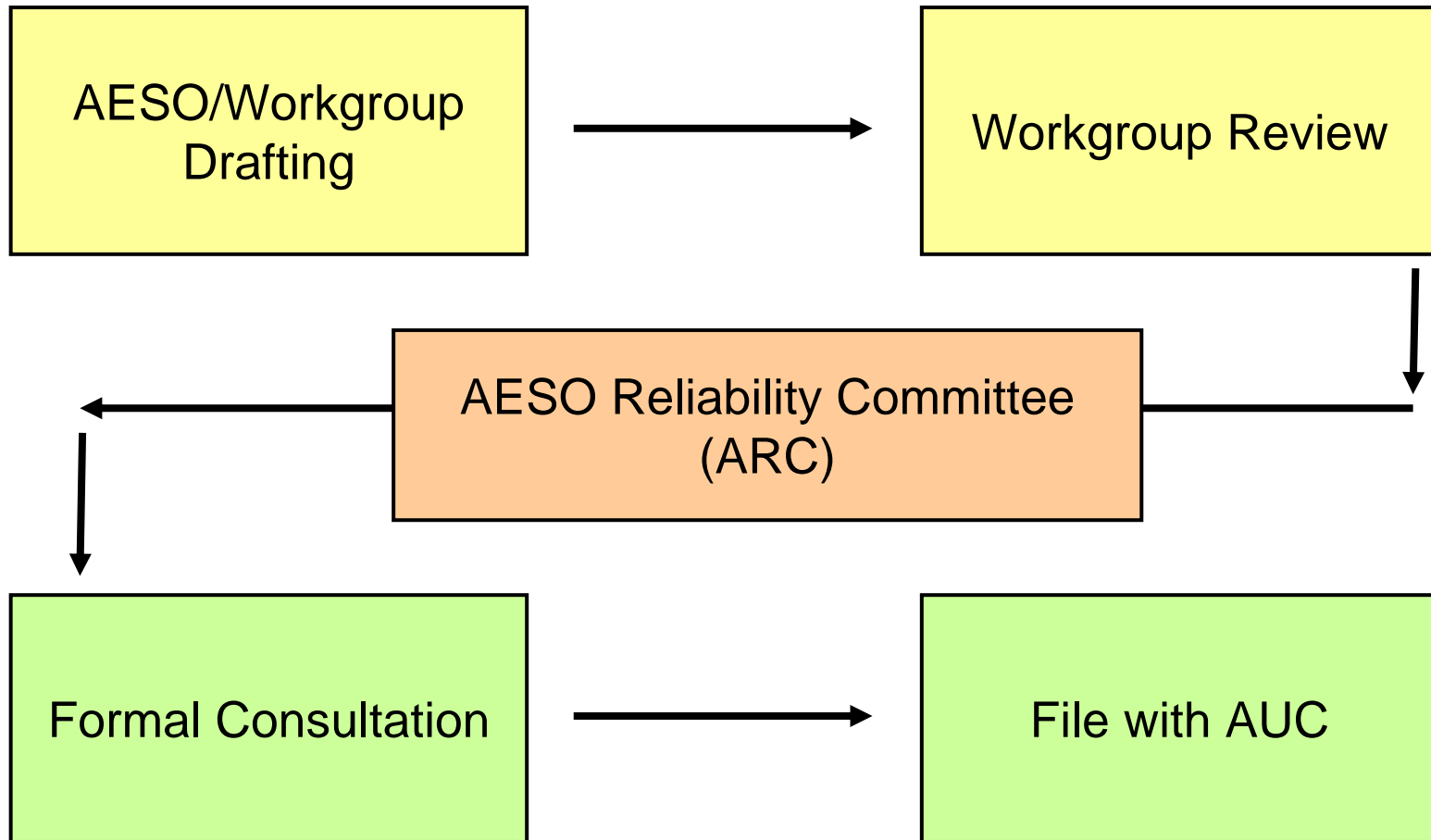
- Implementation of Alberta Reliability Standards (ARS)
 - Status Update
- Compliance Monitoring
 - General Issues
 - Compliance Monitoring Program
 - Outreach
- Question and Answer Period

Alberta Reliability Standards Implementation

Jason Murray, Manager ARS Implementation

- 2007 Transmission Regulation required the AESO to adopt U.S. NERC/WECC reliability standards
- AESO established working groups (ARC) of affected stakeholders to create made-in-Alberta reliability standards
- The draft ARS are consulted on with stakeholders similar to ISO rules process
- ARS are filed with and approved by the AUC

ARS Process



- Following the AESO's review and consultation with stakeholders, the AESO may make one of the following recommendations to the AUC on the adoption of a U.S. (NERC/WECC) Reliability Standard as an ARS:
 - Recommend approval as an ARS consistent with the U.S. Reliability Standard
 - Recommend approval as an ARS that contains an Alberta variance to the U.S. standard (a material change from the U.S. standard as determined by the AESO)
 - Recommend to reject the U.S. standard as an ARS

Status Update - 2009

Filing Cycle	Filed with AUC	Applicable in Alberta	Rejected in Alberta	Participant Applicable
Oct 2008	3	3	0	3
Jan 2009	8	3	5	3
Apr 2009	2	2	0	2
July 2009	39	16	23	16
Nov 2009	17	10	7	7
Total	69	34	35	31

Status Update - 2010



Month	Consultation Period	Applicable in Alberta	Rejected in Alberta	Participant Applicable	Filing with AUC
Jun	14	8	6	8	
Jul	13	13	0	12	
Aug	13	12	1	11	
Sept					14
Oct					13
Nov					13
Total	40	33	7	31	40

* 13 additional standards are far along in the NERC review process and will be addressed in 2011 by the AESO (9 standards in NERC Project 2007-3)

- Organizational Impact
 - Technical compliance is often already in place for non-CIP ARS
 - CIP requirements - organizations not technically compliant
 - IT – constantly changing environment, complex integrated systems
- NERC Status
 - NERC Version 3 is approved
 - NERC Version 4 open for comment – significant change
 - NERC allows phased-in implementation of changes
 - 3 years for auditable compliance with most requirements
 - Allow some exceptions where technically infeasible to comply

- Alberta to align with NERC (Version 2)
 - Security Working Group will develop implementation targets
 - Begin Work
 - Substantially Compliant
 - Compliant
 - Auditably Compliant
 - Technical Feasibility Exceptions (TFEs) identified as applicable
- Alberta Status Update
 - CIP-001 effective April 12, 2010
 - CIP-002, CIP-003 and CIP-004 – organizational and WECC review
 - CIP-005, CIP-006 and CIP-007 – SWG review and initial AESO review
 - CIP-008, CIP-009 will be reviewed later

ARS Coordination with TOAD

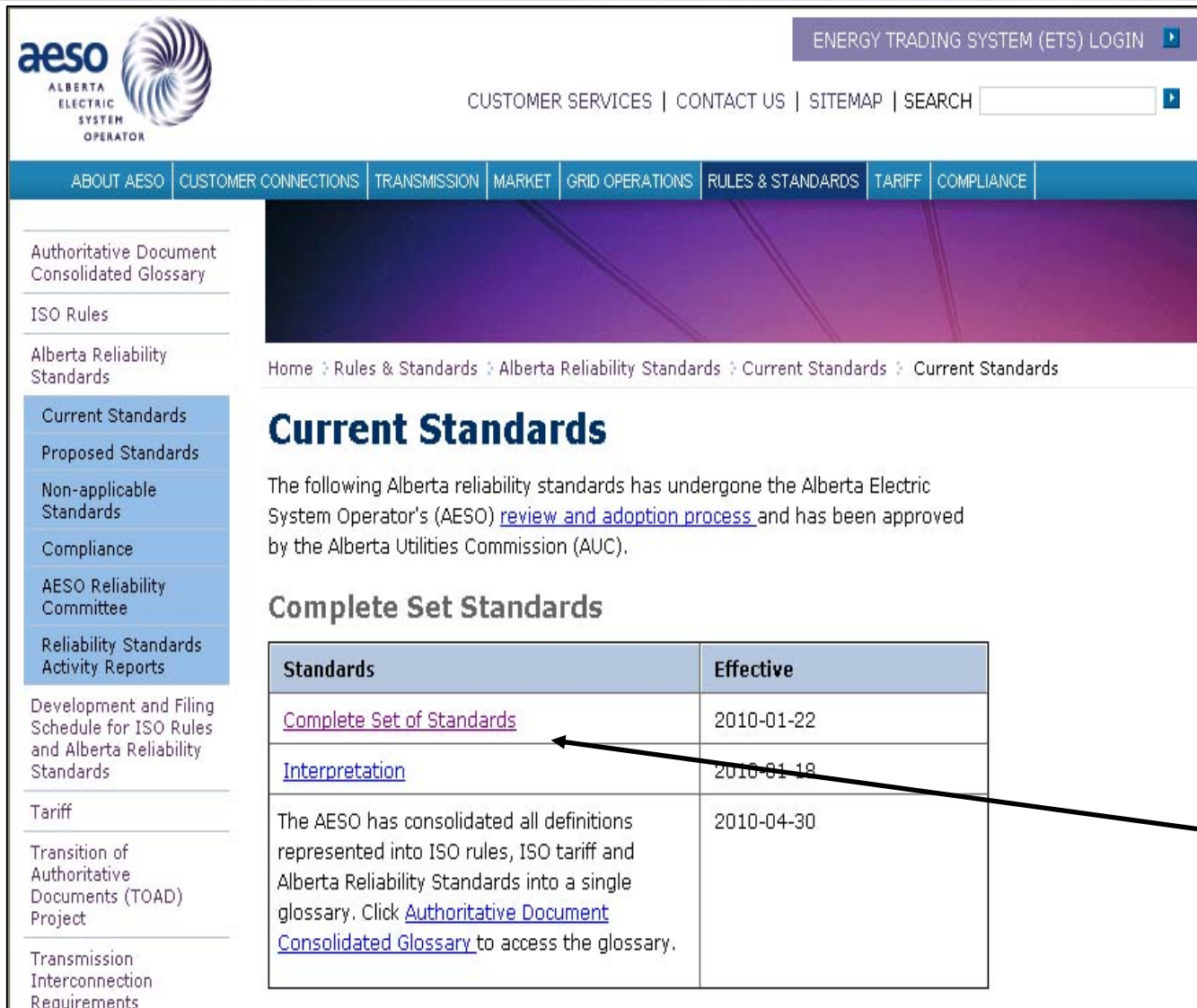
ARS

ISO Rules

Tariff

- TOAD addresses “overlaps” and avoids duplication
- The AESO agrees, in principle, that a requirement should only exist in one type of AESO Authoritative Document (AD)
- No specific duty or responsibility be located in more than one such Authoritative Document
- The final TOAD structure will take time to implement and overlaps may exist in the interim

- Assumptions
 - ARS will continue to be represented in a separate Authoritative Document domain
 - ARS will continue to be adopted and drafted to coincide with NERC standards
 - Overlaps will not be eliminated entirely
- Impact
 - Where a suspected contravention falls under multiple Authoritative Documents, the AESO is obligated to report all contraventions to the MSA



aeso ALBERTA ELECTRIC SYSTEM OPERATOR

ENERGY TRADING SYSTEM (ETS) LOGIN

CUSTOMER SERVICES | CONTACT US | SITEMAP | SEARCH

ABOUT AESO | CUSTOMER CONNECTIONS | TRANSMISSION | MARKET | GRID OPERATIONS | RULES & STANDARDS | TARIFF | COMPLIANCE

Authoritative Document Consolidated Glossary

ISO Rules

Alberta Reliability Standards

Current Standards

Proposed Standards

Non-applicable Standards

Compliance

AESO Reliability Committee

Reliability Standards Activity Reports

Development and Filing Schedule for ISO Rules and Alberta Reliability Standards

Tariff

Transition of Authoritative Documents (TOAD) Project

Transmission Interconnection Requirements

Home > Rules & Standards > Alberta Reliability Standards > Current Standards > Current Standards

Current Standards

The following Alberta reliability standards has undergone the Alberta Electric System Operator's (AESO) [review and adoption process](#) and has been approved by the Alberta Utilities Commission (AUC).

Complete Set Standards

Standards	Effective
Complete Set of Standards	2010-01-22
Interpretation	2010-01-18
The AESO has consolidated all definitions represented into ISO rules, ISO tariff and Alberta Reliability Standards into a single glossary. Click Authoritative Document Consolidated Glossary to access the glossary.	2010-04-30

Click here

Requirements Transmission Reliability Criteria Ancillary Services Technical Requirements Information Documents	Individual Standards		
	Standard	Approved	Effective
	BAL-001-AB-0a Real Power Balancing Control Performance (pdf)	2009-09-09	2009-09-09
	BAL-003-AB-0a Frequency Response and Bias (pdf)	2009-02-04	2009-02-13
	BAL-006-AB-1 Inadvertent Interchange (pdf)	2009-02-04	2009-02-13
	CIP-001-AB-1 Sabotage Reporting (pdf)	2010-01-12	2010-04-12
	EOP-002-AB-2 Capacity and Energy Emergencies (pdf)	2009-09-23	2009-10-03
	EOP-003-AB-1 Load Shedding Plans (pdf)	2009-06-17	2009-06-17
	EOP-004-AB-1 Disturbance Reporting (pdf)	2009-06-17	2009-06-17
	FAC-001-AB-0 Facility Connection Requirements (pdf)	2009-09-23	2010-09-24
	FAC-002-AB-0 Coordination of Plans for New Facilities (pdf)	2009-09-23	2010-03-22
	FAC-003-AB-1 Transmission Vegetation Management Program (html)	2009-01-26	2009-03-27 R1-R2: 2010-01-26
	FAC-501-WECC-AB-1 Transmission Maintenance (pdf)	2009-09-09	2010-09-10
	INT-001-AB-3 Interchange Information (pdf)	2009-09-23	2009-10-03
	INT-003-AB-2 Interchange Transaction Implementation (pdf)	2009-01-26	2009-01-26
	INT-006-AB-2 Response to Interchange Authority (pdf)	2009-09-23	2009-10-03
	INT-009-AB-1 Implementation of Interchange (pdf)	2009-09-23	2009-10-03
	INT-010-AB-1 Interchange Coordination Exemptions (pdf)	2009-09-23	2009-10-03
	IRO-006-WECC-AB-1 Qualified Transfer Path Unscheduled Flow Relief (pdf)	2010-01-12	2010-01-22
	MOD-016-AB-1.1 Documentation of Data Reporting Requirements for Actual and Forecast Demands, and Net Energy for Load (pdf)	2010-01-12	2010-01-22
	MOD-017-AB- 0.1 Aggregated Actual and Forecast Demands and Net Energy for Load (pdf)	2010-01-12	2010-01-22
	MOD-018-AB-0 Reports of Actual and Forecast Demand	2010-01-12	2010-01-22

Click here





ENERGY TRADING SYSTEM (ETS) LOGIN [▶](#)

CUSTOMER SERVICES | CONTACT US | SITEMAP | SEARCH

[ABOUT AESO](#) | [CUSTOMER CONNECTIONS](#) | [TRANSMISSION](#) | [MARKET](#) | [GRID OPERATIONS](#) | [RULES & STANDARDS](#) | [TARIFF](#) | [COMPLIANCE](#)

Authoritative Document Consolidated Glossary

ISO Rules

Alberta Reliability Standards

Current Standards

Proposed Standards

Non-applicable Standards

Compliance

AESO Reliability Committee

Reliability Standards Activity Reports

Development and Filing Schedule for ISO Rules and Alberta Reliability Standards

Tariff

Transition of Authoritative Documents (TOAD) Project

Transmission Interconnection Requirements

Transmission Reliability Criteria

Ancillary Services Technical Requirements

Information Documents

Home ▶ Rules & Standards ▶ Alberta Reliability Standards ▶ Current Standards ▶ FAC-003-AB-1

FAC-003-AB-1

Transmission Vegetation Management Program

[FAC-003-AB-1 Transmission Vegetation Management Program \(pdf\)](#)
Effective: 2009-03-27 (R1-R2; 2010-01-06)

Related Non-Authoritative Documents:

- ▶ [Management Program Template](#) (MS Word)
- ▶ [Management Program Instructions](#) (MS Word)
- ▶ [Management Plan Template](#) (MS Word)
- ▶ [Quarterly Outage Report](#) (MS Word)
- ▶ [Information Document #2010-010R - Vegetation Management Program \(pdf\)](#)
- *example* -

Requirement	Related Authoritative Documents
R1, R3, R6	OPP 1304 (pdf) - <i>example</i> -
R6, R8	ISO Rules, Section 9.11 (pdf) - <i>example</i> -

Alberta Reliability Standards Stakeholder Information Session

Compliance Update

- Updates
 - General Issues
 - Compliance Monitoring Program
 - Communications

- Transmission Regulation
- AUC Rule 27 – Specified Penalties for Reliability Standards
- MSA Processes for mitigation plans and self-reporting

- Self-certification on 3 standards underway, submissions to WECC by July 31th
- Full self-certification to be set later in 2010
- Audit will be set by MSA/WECC in 2011
 - WECC will develop audit worksheets, plans and procedures
- Some procedural/logistical issues to be worked out, but pretty much the same timelines and process as are being implemented for Alberta market participants
- Enforcement and penalties – follows the same rules and processes as for other Alberta entities

Requirement states when a 'confirmation' or 'confirmation letter' is required to confirm an 'action'. Confirmation letters may come from AESO, other entities, WECC, etc.

- Registered entity are responsible for making requests for confirmations
 - Requests should be made promptly following the action taken, not when you are required to submit evidence for an assessment
 - Entity retains confirmations until they are requested to be submitted
 - If you cannot get a letter, you will not be out of compliance provided you can show you have made reasonable attempts
 - Confirmations are treated as evidence – it should be supportable, checks made to confirm the action was completed
- *Detailed responses are posted to FAQ - Evidence section, AESO Compliance website*

- Clarify who within AESO responds to questions pertaining to reliability standards
 - Standard Owner:
 - Clarify standards, purpose, technical interpretations, scope, development, revisions
 - No opinions of sufficiency of evidence can be made, can say that it's the right type of information being looked for in the requirement
 - Cannot comment or offer any opinions on files or assessments in progress
 - Compliance staff:
 - Inquiries around compliance processes
 - Assessments, referrals, or files in progress
 - General questions around evidence, measures, assessment worksheets, etc.
 - Won't look at specific evidence and offer an opinion on compliance outside of the assessment process
 - Nobody can:
 - Give you assurances that you are compliant until the evidence is assessed in an assessment
- Who's the standard owner?
 - Contact rscompliance@aeso.ca with your inquiry or call the Compliance Administrator at (403) 539-2754
- *Detailed responses will be posted to FAQ - Evidence section, AESO Compliance website*

Technical Feasibility Exceptions

- For CIP standards, there are cases where it is not possible for a requirement or the standard to be ‘strictly’ followed, and an exception is required
 - Security WG will formally define what constitutes a ‘technical feasibility exception’
 - Definition should align with the NERC definition
 - Where the standard owner identifies that a ‘technical feasibility exception’ is allowed, that will be included in standard
- TFEs won’t be needed until standards become effective, most are 2-3 years away due to the implementation period
- In 2011 – details on handling TFEs should be finalized
 - E.g. roles, processes, criteria for acceptance, etc.
 - Expect alignment to the NERC model

- Self-Certification Cycle 2 market participants certified by April 30
- A few common issues found:
 - Follow the prescribed format
 - Request exemptions early in process
- Self-Certification Cycle 3 market participants in process of getting ready
 - Workshop held May 18 to assist in process
 - Submittal period July 1 through July 31

- Example FAC-003-AB-1
- 7 market participants were identified in 2009; one additional market participant self-identified in 2010
- AESO issues reminders each quarter requesting information to be submitted; challenge has been to identify appropriate contact for these reminders
- Quarterly Reporting currently through email
- Other periodic reporting occurring as required; e.g. EOP-004-AB-1 Disturbance Reporting

- Multiple Entity Registration
 - Acknowledgement & Consent
- Legal Entity / Functional Entity / Assets
- TOAD Glossary changes impact on Functional Model
 - Legal Owner of Generating Facilities
 - Legal Owner of Transmission Facilities
- Please update as contact personnel change
- Exemption from Registry?

MSA Compliance Process

- In the Spring 2010 the MSA announced its intent to develop a compliance process document outlining the processes and procedures the MSA will follow on a go forward basis
- Final Document expected June 30
- For information

<http://www.albertamsa.ca/1139.html>

- Self-Report / Mitigation Plan Draft Format

<http://www.albertamsa.ca/1127.html>

- When invited by the MSA, the AESO will provide technical assistance in the review and assessment of Self-Report and Mitigation Plan documents

- Provide market participants with information on the development and use of reliability standards audit worksheets (RSAW) in assessments.
- RSAWs are an assessment work tool, not an authoritative document.
- RSAWS:
 - Guide the auditor – questioning and methodology
 - Concise record of evidence, references, and notes
 - Support consistent auditing of the standard
 - Does not limit scope of auditing or assessment
 - Will be provided as evidence as appropriate
- 5 RSAWs posted / 5 new RSAWs by end of June

- Compliance Monitoring Program document to incorporate change from Compliance Monitoring Authority to Compliance Monitor; reflects the addition of the WECC as a Compliance Monitor
- Audit Program Guideline expected Q3
- 3-5 Year Audit Schedule included in Audit Program
- Various guideline documents ongoing maintenance & updates as required such as TOAD Glossary changes

Compliance Monitoring Program Schedule



- Periodic Reporting
 - As scheduled in each standard
- Self-Certification
 - Cycle 3: for period Mar 1-09 to Jun 30-10; due Jul 31-10
 - Cycle 4: for period Mar 1-09 to Sep 30-10; due Oct 31-10
 - Cycle 1: notifications to be sent out October 31
- Commence Audits:
 - 4Q 2010; notification with minimum 30 days notice prior to commencement

- Provide our stakeholders with information, processes, and guidance to allow AESO to assess compliance to reliability standards
 - Stakeholder Information Sessions – an overview session to provide a broader view of the developments and issues related to compliance monitoring
 - Workshops – to improve understanding/clarity of compliance requirements and processes for stakeholders
 - Compliance Working Group – on more major issues or issues that the compliance group requires input and advice from selected industry group representatives
 - AESO Web site (compliance section) – reference information, guidelines, templates, schedules, etc. Recently added – Frequently Asked Questions (FAQ) section

- Acknowledgement & Consent – as requested
- Workshops:
 - Self-Certification Cycle 4 – August 2010
 - Self-Certification Cycle 1 – tentative November 2010
 - RSAWs – August 2010; October 2010; January 2011
 - Audit Program & Guideline – September 2010
 - Evidence – September 2010; January 2011

Contact us:



- Email rscompliance@aeso.ca

- Nancy Cameron, Manager Reliability Standards (403) 539-2508
- Peter Wong, Director Compliance (403) 539-2552

- ARS Implementation information links
 - www.aeso.ca/rulesprocedures/17004.html
- Alberta Reliability Standards Project Plan (June 2010)
 - [Current Alberta Reliability Standards](#)
 - [Proposed Alberta Reliability Standards](#)
 - [Non-applicable Standards](#)
 - [AESO Reliability Committee \(ARC\)](#)
 - [Reliability Standards Activity Reports](#)

- Compliance information links
 - <http://www.aeso.ca/loadsettlement/17189.html>
- Compliance Guidelines and Information
 - [Self-Certification](#)
 - [Reliability Standards Audit Worksheets \(RSAWs\)](#)
 - [Compliance Monitoring Program](#)
 - [Registrations Guideline](#)
 - [Compliance Data Submittal Guide](#)

Questions ?