



Stakeholder Comparison Comment Rationale Matrix

2010-09-30

AESO AUTHORITATIVE DOCUMENT PROCESS

Alberta Reliability Standard – COM-001-AB-1.1 Telecommunications

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>	Contact: <u>Karina Muniz</u>
Period of Consultation [yyyy/mm/dd]: <u>2010/09/30</u> through <u>2010/10/29</u>	Phone: <u>403-267-5963</u>
Comments From: <u>Altalink Management Ltd.</u>	E-mail: <u>karina.muniz@altalink.ca</u>
Date [yyyy/mm/dd]: <u>2010/10/29</u>	

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-001-1.1 AND ALBERTA COM-001-AB-1.1

Telecommunications

NERC COM-001-1.1	Alberta COM-001-AB-1.1	AESO Reason for Difference	Stakeholder Comments	AESO Replies
<p>Purpose Each Reliability Coordinator, Transmission Operator and Balancing Authority needs adequate and reliable telecommunications facilities internally and with others for the exchange of Interconnection and operating information necessary to maintain reliability.</p>	<p>Purpose The purpose of this reliability standard is to ensure the ISO and each legal owner of a transmission facility have adequate and reliable telecommunication devices internally and with others for the exchange of interconnection and operating information necessary to maintain reliability.</p>	<p>Clarified the purpose to align with the content of the reliability standard.</p>		
<p>Applicability 4.1. Transmission Operators. 4.2. Balancing Authorities. 4.3. Reliability Coordinators. 4.4. NERCNet User Organizations.</p>	<p>Applicability This reliability standard applies to the following:</p> <ul style="list-style-type: none"> the legal owner of a transmission facility; and the operator of a transmission facility; and the ISO. 	<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 checked="" type="checkbox"/> Support with language suggestions <input type="checkbox"/> Oppose</p> <p>General Comment: - The term 'legal owner of a transmission facility' is not a recognized approved functional entity and therefore, there are currently no entities registered in this category. Before standards are approved with new categories of applicability, we believe those new categories should first go through stakeholder consultation and be approved as required.</p> <p>Subsequently, the AESO will need</p>	

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			<p><i>to change the functional entities in their registration criteria and have entities adjust their registration as required. Additionally, AltaLink would also like to understand how the definition of 'legal owner' maps with the definition of TFO.</i></p>	
<p>Effective Date May 13, 2009</p>	<p>Effective Date One hundred and eighty (180) days after the date the Commission approves it.</p>	<p>To allow a reasonable amount of time for Alberta entities to implement this Alberta Reliability Standard.</p>	<p><input checked="" type="checkbox"/> Support <input type="checkbox"/> Support with language suggestions <input type="checkbox"/> Oppose</p> <p><i>AltaLink has no comment on ISO requirements</i></p>	
<p>R1. Each Reliability Coordinator, Transmission Operator and Balancing Authority shall provide adequate and reliable telecommunications facilities for the exchange of Interconnection and operating information:</p> <p>R1.1. Internally.</p> <p>R1.2. Between the Reliability Coordinator and its Transmission Operators and Balancing Authorities.</p>	<p>R1 The ISO must provide adequate, reliable, and, where applicable, diverse and redundant telecommunication devices for the exchange of interconnection and operating information internally and with the following:</p> <ul style="list-style-type: none"> • each legal owner of a transmission facility; • a transmission operator that is interconnected; • each adjacent balancing authority; and 	<p><input type="checkbox"/> New <input checked="" type="checkbox"/> Amended <input type="checkbox"/> Deleted</p> <p>NERC requirement R1 was split into two Alberta requirements, R1 for the ISO and R2 for the legal owner of a transmission facility.</p> <p>Moved the NERC sub-requirements for R1 into the main Alberta requirements R1 and R2.</p>	<p><input type="checkbox"/> Support <input checked="" type="checkbox"/> Support with language suggestions <input type="checkbox"/> Oppose</p> <p><i>Same comments as in the Applicability section.</i></p> <p>General Comment: <i>AltaLink would like to obtain more clarity on the roles and</i></p>	

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<p>R1.3. With other Reliability Coordinators, Transmission Operators, and Balancing Authorities as necessary to maintain reliability.</p> <p>R1.4. Where applicable, these facilities shall be redundant and diversely routed.</p>	<ul style="list-style-type: none"> the WECC Reliability Coordinator. <p>R2 Each legal owner of a transmission facility must provide adequate, reliable, and, where applicable, diverse and redundant telecommunication devices, for the exchange of interconnection and operating information internally and with the following:</p> <ul style="list-style-type: none"> other legal owners of a transmission facility; other transmission operators that are interconnected; and the ISO. 	<p>NERC sub-requirements R1.1, R1.2, R1.3, and R1.4 included as part of requirement R1 and R2.</p>	<p><i>responsibilities required here.</i></p> <p><i>The way the standard is currently written, this requirement could apply to either the Operator or the "legal owner". It needs more clarification. For example: it would apply more to the owner versus the operator if one considers the operator might be doing the work, however the owner has the final investment approval for the addition/replacement for any of this equipment to meet the requirements, thus, this requirement would be more applicable to the "legal owner". The Transmission Operator would certainly make recommendations as to what should be added/replaced to meet the requirements but it would require the "legal owner"s approval to proceed with these changes as they ultimately would pay for the costs to do this.</i></p>	
<p>R2. Each Reliability Coordinator, Transmission Operator, and Balancing Authority shall manage, alarm, test and/or actively monitor vital telecommunications facilities. Special attention shall be given to</p>	<p>R3 The ISO and each operator of a transmission facility must, as of the effective date of this reliability standard, manage, alarm, test, and actively monitor its telecommunication devices that it</p>	<p><input type="checkbox"/> New <input checked="" type="checkbox"/> Amended <input type="checkbox"/> Deleted</p> <p>Removed the reference to 'special</p>	<p><input checked="" type="checkbox"/> Support <input type="checkbox"/> Support with language suggestions <input type="checkbox"/> Oppose</p>	

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<p>emergency telecommunications facilities and equipment not used for routine communications.</p>	<p>has determined to be vital, including emergency telecommunication devices and equipment not used for routine communications.</p>	<p>attention' as it is not measurable.</p> <p>Provided clarification that requirement R3 applies on a go forward basis from the effective date of this reliability standard. Added "as appropriate" to allow for making a determination of what are "vital" and "emergency" telecommunication devices.</p> <p>Combined the two sentences in the NERC requirement into a single sentence.</p>	<p><i>Altalink has no comment on ISO requirements</i></p>	
<p>R3. Each Reliability Coordinator, Transmission Operator and Balancing Authority shall provide a means to coordinate telecommunications among their respective areas. This coordination shall include the ability to investigate and recommend solutions to telecommunications problems within the area and with other areas.</p>	<p>R4 The ISO must coordinate telecommunications with each legal owner of a transmission facility, the WECC Reliability Coordinator, adjacent interconnected transmission operators and adjacent balancing authorities, including the ability to investigate and recommend solutions to telecommunications problems within Alberta.</p> <p>R5 Each operator of a transmission facility must coordinate telecommunications with the ISO and adjacent interconnected transmission</p>	<p><input type="checkbox"/> New <input checked="" type="checkbox"/> Amended <input type="checkbox"/> Deleted</p> <p>Split into two requirements to delineate requirements between AESO and a legal owner of a transmission facility.</p>	<p><input type="checkbox"/> Support <input checked="" type="checkbox"/> Support with language suggestions <input type="checkbox"/> Oppose</p> <p><i>Same comments as in the Applicability section.</i></p>	

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	<p>operators, including the ability to investigate and recommend solutions to telecommunications problems within Alberta.</p>			
<p>R4. Unless agreed to otherwise, each Reliability Coordinator, Transmission Operator, and Balancing Authority shall use English as the language for all communications between and among operating personnel responsible for the real-time generation control and operation of the interconnected Bulk Electric System. Transmission Operators and Balancing Authorities may use an alternate language for internal operations.</p>	<p>R6 The ISO and each operator of a transmission facility must use the English language for all communications between their respective operating personnel responsible for the real-time generation control and operation of the bulk electric system.</p>	<p><input type="checkbox"/> New <input checked="" type="checkbox"/> Amended <input type="checkbox"/> Deleted</p> <p>Amended for clarity and consistency.</p> <p>The AESO is aware that this requirement appears to apply better in COM-002 Communications and Coordination; however the AESO has chosen to leave this requirement in COM-001 at this time.</p>	<p><input checked="" type="checkbox"/> Support <input type="checkbox"/> Support with language suggestions <input type="checkbox"/> Oppose</p> <p><i>Altalink has no comment on ISO requirements</i></p>	
<p>R5. Each Reliability Coordinator, Transmission Operator, and Balancing Authority shall have written operating instructions and procedures to enable continued operation of the system during the loss of telecommunications facilities.</p>	<p>R7 The ISO and each operator of a transmission facility must have written operating instructions and procedures to enable continued operation of the system during the loss of telecommunications devices.</p>	<p><input type="checkbox"/> New <input checked="" type="checkbox"/> Amended <input type="checkbox"/> Deleted</p> <p>Amended for clarity and consistency.</p>	<p><input checked="" type="checkbox"/> Support <input type="checkbox"/> Support with language suggestions <input type="checkbox"/> Oppose</p> <p><i>Altalink has no comment on ISO requirements</i></p>	
<p>R6. Each NERCNet User Organization shall adhere to the requirements in Attachment 1- COM-</p>		<p><input type="checkbox"/> New <input type="checkbox"/> Amended</p>	<p><input checked="" type="checkbox"/> Support</p>	

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001, "NERCNet Security Policy."		<input checked="" type="checkbox"/> Deleted Alberta Variance: The NERC requirement for NERCNet User organizations to adhere to Attachment 1- COM-001, "NERCNet Security Policy" was deleted as no Alberta entity is a NERCNet User Organization.	<input type="checkbox"/> Support with language suggestions <input type="checkbox"/> Oppose <i>Altalink has no comment on ISO requirements</i>	
	<p>MR1 Evidence of adequate and reliable telecommunications exists, as specified in requirement R1, such as a description of devices or a diagram identifying the communications.</p> <p>MR2 Evidence of adequate and reliable telecommunications exists, as specified in requirement R2, such as a description of devices or a diagram identifying the communications.</p>	<input checked="" type="checkbox"/> New <input type="checkbox"/> Amended <input type="checkbox"/> Deleted Added to align with requirements R1 and R2.	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Support with language suggestions <input type="checkbox"/> Oppose <i>Altalink has no comment on ISO requirements</i>	
<p>M1. Each Reliability Coordinator, Transmission Operator and Balancing Authority shall have and provide upon request evidence that could include, but is not limited to communication facility test-procedure documents, records of testing, and maintenance records for communication facilities or equivalent that will be used to confirm that it</p>	<p>MR3 Evidence exists to confirm the ISO and each legal owner of a transmission facility manages, alarms, tests and actively monitors vital telecommunications devices as specified in requirement R3.</p>	<input type="checkbox"/> New <input checked="" type="checkbox"/> Amended <input type="checkbox"/> Deleted Amended to align with requirement R3.	<input type="checkbox"/> Support <input checked="" type="checkbox"/> Support with language suggestions <input type="checkbox"/> Oppose <i>Same comments as in the</i>	

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Telecommunications

NERC COM-001-1.1	Alberta COM-001-AB-1.1	AESO Reason for Difference	Stakeholder Comments	AESO Replies
manages, alarms, tests and/or actively monitors vital telecommunications facilities. (Requirement 2 part 1)			<i>Applicability section.</i>	
	<p>MR4 Evidence exists to confirm coordinated telecommunications as specified in requirement R4, such as email, log files, voice recordings or other equivalent evidence.</p> <p>MR5 Evidence exists to confirm coordinated telecommunications as specified in requirement R5, such as email, log files, voice recordings or other equivalent evidence.</p>	<p><input checked="" type="checkbox"/> New <input type="checkbox"/> Amended <input type="checkbox"/> Deleted</p> <p>Added to align with requirements R4 and R5.</p>	<p><input checked="" type="checkbox"/> Support <input type="checkbox"/> Support with language suggestions <input type="checkbox"/> Oppose</p> <p><i>Altalink has no comment on ISO requirements</i></p>	
<p>M2. The Reliability Coordinator, Transmission Operator or Balancing Authority 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 equivalent, that will be used to determine compliance to Requirement 4.</p>	<p>MR6 Evidence exists to confirm that the English language is used for all communications as specified in requirement R6, such as operator logs, email, voice recordings or electronic tag records.</p>	<p><input type="checkbox"/> New <input checked="" type="checkbox"/> Amended <input type="checkbox"/> Deleted</p> <p>Amended to align with requirement R6.</p>	<p><input checked="" type="checkbox"/> Support <input type="checkbox"/> Support with language suggestions <input type="checkbox"/> Oppose</p> <p><i>Altalink has no comment on ISO requirements</i></p>	
<p>M3. Each Reliability Coordinator, Transmission Operator and Balancing Authority shall have and provide upon request its current operating instructions and procedures, either electronic or hard copy that will be used to confirm that</p>	<p>MR7 Written operating instructions and procedures exist as specified in requirement R7.</p>	<p><input type="checkbox"/> New <input checked="" type="checkbox"/> Amended <input type="checkbox"/> Deleted</p> <p>Amended to align with requirement R7.</p>	<p><input checked="" type="checkbox"/> Support <input type="checkbox"/> Support with language suggestions <input type="checkbox"/> Oppose</p>	

COMPARISON BETWEEN NERC COM-001-1.1 AND ALBERTA COM-001-AB-1.1

Telecommunications

NERC COM-001-1.1	Alberta COM-001-AB-1.1	AESO Reason for Difference	Stakeholder Comments	AESO Replies
it meets Requirement 5.			<i>Altalink has no comment on ISO requirements</i>	
<p>M4. The NERCnet User Organization shall have and provide upon request evidence that could include, but is not limited to documented procedures, operator logs, voice recordings or transcripts of voice recordings, electronic communications, etc that will be used to determine if it adhered to the (User Accountability and Compliance) requirements in Attachment 1-COM-001. (Requirement 6)</p>		<input type="checkbox"/> New <input type="checkbox"/> Amended <input checked="" type="checkbox"/> Deleted	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Support with language suggestions <input type="checkbox"/> Oppose <i>Altalink has no comment on ISO requirements</i>	
<p>Compliance To view the compliance section D of the NERC reliability standard follow this link: http://www.nerc.com/files/COM-001-1_1.pdf</p>		<p>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.</p>		
<p>Regional Differences None identified.</p>	None identified.	Not applicable in Alberta		

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