



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: _____
Period of Consultation [yyyy/mm/dd]: <u>2010/09/30</u> through <u>2010/10/29</u>	Phone: _____
Comments From: <u>TransAlta</u>	E-mail: _____
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 type="checkbox"/> Support with language suggestions <input checked="" type="checkbox"/> Oppose</p> <p>The terms ‘legal Owner of a transmission facility’ and ‘Operator of a transmission facility’ is not a defined functional entity in the AESO’s Alberta Reliability Standards Functional Model and Criteria for Registration. There are therefore no entities currently registered in this category and without the criteria for registration defined it is impossible to determine who should be responsible to comply to this standard or who the AESO is</p>	

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			<p>planning to monitor for compliance. Before any standard is approved with new functional entities the AESO should first ensure that the functional model is consulted upon by stakeholders, updated and communicated to stakeholders and provide sufficient time for entities to reach agreement with their commercial counterparties and to adjust their registration as required.</p> <p>TransAlta requests confirmation from the AESO that even though the entity 'Generator' is not specified in this standard, nor is a generator with a transmission interconnection, it is not appropriate that any generator be required to comply with this standard.</p> <p>TransAlta requests AESO to provide the reason for difference why 'the legal owner of a transmission facility' is applicable to this standard while the NERC standard applies only to the 'transmission operator'.</p>	



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Telecommunications

NERC COM-001-1.1	Alberta COM-001-AB-1.1	AESO Reason for Difference	Stakeholder Comments	AESO Replies
<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 type="checkbox"/> Support <input type="checkbox"/> Support with language suggestions <input checked="" type="checkbox"/> Oppose </p> <p>General Concern A review of the AESO's implementation schedule shows that given the large volume of standards that are going through stakeholder comment right now it is very possible that the result is a large number of standards approved at the same time all with a 180 day effective date. (ie. the same effective date) While an effective date of 180 days may work for one standard, it certainly will not work for many that may all fall on the same date. TransAlta requests the AESO develop a reasonable and certain schedule that ensures that effective dates are set up looking at the program as a whole, not just a standard at a time. The effective date should not be approved without this schedule being available so a proper assessment can be made as to the reasonableness of the effective date.</p>	

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Telecommunications

NERC COM-001-1.1	Alberta COM-001-AB-1.1	AESO Reason for Difference	Stakeholder Comments	AESO Replies
<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>R1.3. 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>	<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 • 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><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>NERC sub-requirements R1.1, R1.2, R1.3, and R1.4 included as part of requirement R1 and R2.</p>	<p><input 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

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NERC COM-001-1.1	Alberta COM-001-AB-1.1	AESO Reason for Difference	Stakeholder Comments	AESO Replies
<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 emergency telecommunications facilities and equipment not used for routine communications.</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 has determined to be vital, including emergency telecommunication devices and equipment not used for routine communications.</p>	<p><input type="checkbox"/> New <input checked="" type="checkbox"/> Amended <input type="checkbox"/> Deleted</p> <p>Removed the reference to ‘special 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><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>TransAlta thanks AESO for making some requirements and measures clearer than NERC’s version in that it states ‘as of the effective date...’</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</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 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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Telecommunications

NERC COM-001-1.1	Alberta COM-001-AB-1.1	AESO Reason for Difference	Stakeholder Comments	AESO Replies
	<p>Alberta.</p> <p>R5 Each operator of a transmission facility must coordinate telecommunications with the ISO and adjacent interconnected transmission 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 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>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</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 type="checkbox"/> Support <input type="checkbox"/> Support with language suggestions <input type="checkbox"/> Oppose</p> <p><i>Insert comments, reason for</i></p>	

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NERC COM-001-1.1	Alberta COM-001-AB-1.1	AESO Reason for Difference	Stakeholder Comments	AESO Replies
loss of telecommunications facilities.			<i>position, and alternate proposal (if any).</i>	
<p>R6. Each NERCNet User Organization shall adhere to the requirements in Attachment 1- COM-001, “NERCNet Security Policy.”</p>		<p> <input type="checkbox"/> New <input type="checkbox"/> Amended <input checked="" type="checkbox"/> Deleted </p> <p>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.</p>	<p><i>Insert comments, reason for position, and alternate proposal (if any).</i></p>	
	<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>	<p> <input checked="" type="checkbox"/> New <input type="checkbox"/> Amended <input type="checkbox"/> Deleted </p> <p>Added to align with 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>Insert comments, reason for position, and alternate proposal (if any).</i></p> <p>General Comment: Each measure in this standard must specify the applicable entity to be consistent with previous standards.</p>	
<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</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</p>	<p> <input type="checkbox"/> New <input checked="" type="checkbox"/> Amended <input type="checkbox"/> Deleted </p>	<p> <input type="checkbox"/> Support <input type="checkbox"/> Support with language suggestions <input checked="" 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
<p>communication facility test-procedure documents, records of testing, and maintenance records for communication facilities or equivalent that will be used to confirm that it manages, alarms, tests and/or actively monitors vital telecommunications facilities. (Requirement 2 part 1)</p>	<p>specified in requirement R3.</p>	<p>Amended to align with requirement R3.</p>	<p>R3 references the 'Operator of a transmission facility'.</p> <p>MR3 references the 'legal owner of a transmission facility'. Correction required such that MR3 states "Operator of a transmission facility"</p> <p>MR3 TransAlta recommends the NERC M1 be used as it provides helpful information that would be useful in the ARS. For instance: could include, but is not limited to communication facility test-procedure documents, records of testing, and maintenance records for communication facilities or equivalent</p>	
	<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 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>M2. The Reliability Coordinator,</p>	<p>MR6 Evidence exists to confirm that</p>	<p><input type="checkbox"/> New</p>	<p><input type="checkbox"/> Support</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
<p>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>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 checked="" type="checkbox"/> Amended <input type="checkbox"/> Deleted Amended to align with requirement R6.</p>	<p><input type="checkbox"/> Support with language suggestions <input type="checkbox"/> Oppose <i>Insert comments, reason for position, and alternate proposal (if any).</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 it meets Requirement 5.</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 Amended to align with requirement R7.</p>	<p><input type="checkbox"/> Support <input type="checkbox"/> Support with language suggestions <input checked="" type="checkbox"/> Oppose <i>Insert comments, reason for position, and alternate proposal (if any).</i> TransAlta recommends that 'electronic' copies of procedures also be used as evidence. NERC references this. TransAlta requests AESO to explain their reasoning if they do not agree to add 'electronic' to this measure.</p>	
<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</p>		<p><input type="checkbox"/> New <input type="checkbox"/> Amended <input checked="" type="checkbox"/> Deleted</p>	<p><input type="checkbox"/> Support <input type="checkbox"/> Support with language suggestions <input type="checkbox"/> Oppose <i>Insert comments, reason for position, and alternate proposal (if</i></p>	

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

Telecommunications

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will be used to determine if it adhered to the (User Accountability and Compliance) requirements in Attachment 1-COM-001. (Requirement 6)			<i>any).</i>	
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		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 .		
Regional Differences None identified.	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		