



**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]: 2010/09/30  
Period of Consultation [yyyy/mm/dd]: 2010/09/30 through 2010/10/29  
Comments From: Capital Power Corporation  
Date [yyyy/mm/dd]: 2010/10/29

Contact: \_\_\_\_\_  
Phone: \_\_\_\_\_  
E-mail: \_\_\_\_\_

*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><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>Capital Power is concerned that the applicability section refers to entities that were not listed in the “ARS Functional Model and Criteria for Registration” and therefore no market participants are registered as such. The sudden change in the applicability of the standards creates confusion and inconsistency across standards. Market participants must be able to assess with certainty whether or not they will be monitored and</p>	

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			<p>audited for compliance with a standard or group of standards. Changes that can expand or reduce the application of a standard are significant and should be done with care and appropriate stakeholder consultation. The registration process should provide certainty to market participants regarding their compliance program obligations and the AESO's audit process. Therefore, if the AESO is proposing to change the terms used in the applicability section of the standards it must be done prior to the approval of any standards that contain the revised applicability terms. Matters of applicability could potentially have a significant impact on our business and therefore Capital Power would greatly appreciate an opportunity to provide guidance and feedback to improve the reliability standards functional entity definitions and registration criteria.</p>	

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<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 <input type="checkbox"/> Oppose</p> <p><i>Insert comments, reason for position, and alternate proposal (if any).</i></p>	
<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</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</p>	<p><input type="checkbox"/> Support <input type="checkbox"/> Support with language suggestions <input checked="" type="checkbox"/> Oppose</p> <p>The Purpose of this standard is to ensure “adequate and effective communications and response capabilities available for addressing a real-time <b>system emergency</b> condition.” As these communication requirements are specific to real-time system emergencies, the “legal owner of an aggregated generating facility” is not the appropriate responsible entity for Requirement 1. Requirement 1 should be applicable to the “operator of the generating facility” to get the most efficient response in an emergency situation by going</p>	

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	<p>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>a supply shortfall event.”</p>	<p>directly to the party that can take action.</p> <p>For joint ownership situations, stating that the applicable entity is the operator of a generating unit will also resolve any complications that may arise in determining which party is responsible for compliance.</p> <p>Placing the obligation on the operator as opposed to owner of a generating facility also aligns with the NERC approach to this standard.</p> <p>However, when the applicability of R1 is changed to the operator of the generating unit, Capital Power notes that two requirements for the same entity will have been generated from a single NERC requirement. The AESO has stated that, where possible, there should be symmetry between the NERC and Alberta versions of Reliability Standards so that it will be easier to identify and implement improvements to the standards initiated by NERC. In keeping with</p>	

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			<p>this guidance, additional requirements should not be added unnecessarily. While we appreciate the additional clarity provided by splitting the requirements, the same clarity could be achieved by using bullet points instead of creating an additional requirement for a single responsible entity and therefore an additional risk of non-compliance for Alberta market participants.</p> <p>In order to avoid duplicative requirements already covered in COM-001-AB-1.1 for TFOs and the AESO our suggested changes for these two requirements are:</p> <p><b>R1 Each operator of a generating unit must have voice and data communication between any operator of a transmission facility to which it is connected and with the ISO.</b></p> <ul style="list-style-type: none"> <li>• Personnel must be 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</li> </ul>	

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			<p>real-time <b>system emergency</b> condition.</p> <p><b>R2</b> The <b>ISO</b>, and each <b>operator</b> of a <b>transmission facility</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>Could the AESO also define “data communications”? We are unclear on whether this refers to ADAMS dispatches, emails or other potential data communications.</p>	
<p><b>R2.</b> Each Reliability Coordinator, Transmission Operator, and 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>R4</b> The <b>ISO</b> must give a verbal <b>directive</b> to an <b>operator</b> of a <b>transmission facility, legal owner of an aggregated generating facility and operator</b> of a <b>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</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 position, and alternate proposal (if any).</i></p>	

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	<p>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><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 the directive. A new requirement, R5, was added to this reliability standard to address this.</p>	<p><input type="checkbox"/> Support  <input checked="" type="checkbox"/> Support with language suggestions  <input type="checkbox"/> Oppose</p> <p>The applicable entity name should be used in this requirement rather than "person" for consistency with other standards and to be clear about the applicability of the requirement.</p>	
<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</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,</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><input type="checkbox"/> Support  <input type="checkbox"/> Support with language suggestions  <input checked="" type="checkbox"/> Oppose</p> <p>MR1 and MR2 should be revised to match our suggested wording of R1 and R2.</p>	

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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)	evidence exists that demonstrate any voice or data communications were addressed, such as voice recordings and <b>operator</b> logs.		MR2 Currently, all applicable entities are not mandated to have voice recording systems at each of their facilities. Therefore, the measure should state that voice recordings OR operator logs could be used as evidence. Another option would be to use the AESO voice recording system as evidence instead.	
	<b>MR3</b> Evidence exists to confirm notification as specified in requirement R3, such as voice recordings, <b>operator</b> logs and email records.	<input checked="" type="checkbox"/> New <input type="checkbox"/> Amended <input type="checkbox"/> Deleted  Added to align with requirement R3.	<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 any).</i>	
<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	<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.	<input type="checkbox"/> New <input checked="" type="checkbox"/> Amended <input type="checkbox"/> Deleted  Amended to align with requirement R4.	<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 any).</i>	

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<p>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>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>R5 refers to verbal directives being issued and repeated back by the applicable entity. Therefore it is not clear how anything other than a voice recording could be used as proof of compliance in MR5. Currently, all applicable entities are not mandated to have voice recording systems at each of their facilities. Therefore, the measure should state that market participants would use the AESO voice recording system as evidence instead.</p>	
<p><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-">http://www.nerc.com/files/COM-002-</a></p>		<p>The Alberta reliability standards do not contain a compliance section. Compliance with all Alberta reliability standards is completed in</p>		

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<a href="#">2.pdf</a>		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		