



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: EPCOR Distribution & Transmission Inc.
Date [yyyy/mm/dd]: 2010/10/29

Contact: Travis Robinson
Phone: 780-412-3079
E-mail: trobinson@epcor.ca

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>Purpose 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>Purpose The purpose of this reliability standard is to ensure the ISO, the operator of a transmission facility, the legal owner of an aggregated generating facility and the operator of a generating unit have adequate and effective communications and response capabilities available for addressing a real-time system emergency condition.</p>	<p>Clarified the purpose to align with the content of the reliability standard.</p>		
<p>Applicability 4.1. Reliability Coordinators. 4.2. Balancing Authorities. 4.3. Transmission Operators. 4.4. Generator Operators.</p>	<p>Applicability This reliability standard applies to:</p> <ul style="list-style-type: none"> • the operator of a transmission facility; • the legal owner of an aggregated generating facility; • the operator of a generating unit; 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>The terms ‘operator of a transmission facility’, ‘legal owner of an aggregated generating facility’ and ‘operator of a generating unit’ are not defined functional entities in the AESO’s Alberta Reliability Standards Functional Model and Criteria for Registration. As such, there are currently no entities registered in these categories, and it is unclear to EDTI on how the AESO will identify, monitor and enforce compliance. EDTI believes that</p>	

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			before standards are approved with new categories of applicability, the new categories should go through stakeholder consultation and be approved as required.	

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<p>Effective Date January 1, 2007</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>EDTI requests more than 180 days for COM-002-AB-2 to become effective after the Commission approves it. Budget Cycle, vendor delivery times and work crew availability may all cause delays that would prevent the implementation of the corrective action necessary to maintain compliance with the standard within the 180 day time period.</p> <p>EDTI notes that there are a large number of standards scheduled to be submitted to the AUC for approval in the next couple of months, with the majority having their effective dates 180 days after approval. While an effective date of 180 days may be appropriate for one standard, it may not be appropriate for numerous standards that all become effective at the same time.</p>	

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Communications and Coordination

NERC COM-002-2	Alberta COM-002-AB-2	AESO Reason for Difference	Stakeholder Comments	AESO Replies
<p>R1. 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>R1.1. 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>R1 Each legal owner of an aggregated generating facility must have voice and data communication between its operator and any operator of a transmission facility to which it is connected and with the ISO.</p> <p>R2 The ISO, each operator of a transmission facility and each operator of a generating unit must have personnel available for all hours of the day, seven (7) days a week, to receive and address any voice or data communication regarding a real-time system emergency condition.</p> <p>R3 The ISO must notify the WECC Reliability Coordinator, adjacent interconnected transmission operators and affected adjacent balancing authorities through predetermined communication paths of any threat to the reliability of the interconnected electric system or if the ISO anticipates shedding firm load.</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: “R3 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 a supply shortfall event.”</p>	<p><input checked="" 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>R2. Each Reliability Coordinator, Transmission Operator, and Balancing Authority shall issue directives in a clear, concise, and</p>	<p>R4 The ISO must give a verbal directive to an operator of a transmission facility, legal owner of an aggregated generating</p>	<p><input type="checkbox"/> New <input checked="" type="checkbox"/> Amended <input type="checkbox"/> Deleted</p>	<p><input checked="" type="checkbox"/> Support <input type="checkbox"/> Support with language suggestions <input type="checkbox"/> Oppose</p>	

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<p>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>facility and operator of a generating unit in a clear, concise and definitive manner. If the recipient of the verbal directive does not respond by repeating the information in the directive as specified in requirement R5, then the ISO must request the recipient to repeat the information in the directive. If the information is repeated correctly, the ISO must verbally acknowledge this to the recipient. If the information in the response is not correct, the ISO must repeat the verbal directive and the above process until the ISO is satisfied that the recipient understands the information in the directive.</p>	<p>Amended for clarity and consistency.</p>	<p><i>Insert comments, reason for position, and alternate proposal (if any).</i></p>	
	<p>R5 Each person who receives a verbal directive from the ISO must repeat the information in the verbal directive back to the ISO correctly, either in response to the initial verbal directive or in response to the ISO's repetition of the verbal directive.</p>	<p><input checked="" type="checkbox"/> New <input type="checkbox"/> Amended <input type="checkbox"/> Deleted</p> <p>Alberta Variance: 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</p>	<p><input type="checkbox"/> Support <input checked="" type="checkbox"/> Support with language suggestions <input type="checkbox"/> Oppose</p> <p>To maintain consistency with previous standards, EDTI suggests replacing the word 'person' with the applicable entities that the standard applies to.</p>	

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		standard to address this.		
<p>M1. 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 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)</p>	<p>MR1 Evidence exists of voice and data communication as specified in requirement R1, such as a list of voice and data communication devices.</p> <p>MR2. Where a real-time system emergency condition has occurred, evidence exists that demonstrate any voice or data communications were addressed, such as voice recordings and operator logs.</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 checked="" 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>MR3 Evidence exists to confirm notification as specified in requirement R3, such as voice recordings, operator 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 R3.</p>	<p><input checked="" 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 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</p>	<p>MR4 Evidence exists to verify the requirement as specified in requirement R4 such as, voice recordings, operator logs and email records.</p>	<p><input type="checkbox"/> New <input checked="" type="checkbox"/> Amended <input type="checkbox"/> Deleted</p> <p>Amended to align with requirement R4.</p>	<p><input checked="" 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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NERC COM-002-2	Alberta COM-002-AB-2	AESO Reason for Difference	Stakeholder Comments	AESO Replies
to determine if it notified its Reliability Coordinator, and all other potentially 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)				
	MR5 Evidence exists to verify the requirement as specified in requirement R5 such as, voice recordings, operator logs and email records.	<input checked="" type="checkbox"/> New <input type="checkbox"/> Amended <input type="checkbox"/> Deleted Added to align with requirement R5.	<input checked="" 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>	
Compliance To view the compliance section D of the NERC reliability standard follow this link: http://www.nerc.com/files/COM-002-2.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		