



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: TransAlta
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>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 type="checkbox"/> Support with language suggestions <input checked="" type="checkbox"/> Oppose</p> <p>The terms ‘legal owner of an aggregated generating facility’, ‘operator of a transmission facility’ and ‘operator of a generating unit’ are not a defined functional entities in the AESO’s Alberta Reliability Standards Functional Model and Criteria for Registration. There are therefore no entities currently registered in these categories and without the criteria for registration defined it is impossible to determine who should be responsible to comply</p>	

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			<p>to this standard or who the AESO is 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>General Comment: TransAlta requests AESO to consider changing the applicability of this standard from 'owner of an aggregated generation facility' to 'operator of a generating unit'. We believe it is the operator's responsibility to own and manage telecommunications as this is how NERC seems to have approached it.</p> <p>TransAlta would like the AESO to explain why this standard applies to 'the legal owner of an aggregated generating facility' but only 'the operator of a generating</p>	

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			unit' and not 'the operator of an aggregated generating facility'.	

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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>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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<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 type="checkbox"/> Support <input type="checkbox"/> Support with language suggestions <input checked="" type="checkbox"/> Oppose</p> <p>R1 See general comment under the applicability section.</p> <p>R1 As it is written now, voice communication can simply be an in-person conversation. We believe the intent is to ensure communication <u>links</u> are in place. By separating NERC R1 into two requirements an important principle may have been lost. It is important that the voice and data links are available for all hours of the day, 7 days a week, not just the personnel. As currently drafted, R1 does not require links for all hours. This could mean, for instance, that all phone coverage during day-time hours only would be sufficient. We don't believe this is the intent.</p> <p>R2 We believe that the word 'address' should be replaced with 'available'. TransAlta requests</p>	

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			AESO to prove the reason for the difference in wording of this from the NERC standard.	
<p>R2. 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>R4 The ISO must give a verbal directive to an operator of a transmission facility, legal owner of an aggregated generating 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> <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 checked="" type="checkbox"/> Oppose </p> <p><i>Insert comments, reason for position, and alternate proposal (if any).</i></p> <p>R4: See general comment under the applicability section.</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</p>	<p> <input checked="" type="checkbox"/> New <input type="checkbox"/> Amended <input type="checkbox"/> Deleted </p>	<p> <input type="checkbox"/> Support <input checked="" type="checkbox"/> Support with language suggestions <input type="checkbox"/> Oppose </p>	

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	<p>directive or in response to the ISO's repetition of the verbal directive.</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 standard to address this.</p>	<p>R5 TransAlta suggests that this requirement must state the applicable entity to ensure consistency with other standards development.</p> <p>R5 Currently in Alberta it is unclear as to what constitutes a directive. The proposed new NERC standard COM-002-3 adds clarity around the term <u>directive</u>. Specifically it states the ISO must indicate they are issuing a directive by using the term "Reliability Directive" when requesting an action from a recipient. TransAlta is requesting the AESO adopt this term to provide clarity.</p>	
<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</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</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><i>Insert comments, reason for position, and alternate proposal (if any).</i></p>	

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<p>equivalent evidence that confirms that the communications have been provided to address a real-time emergency condition. (Requirement 1, part 1)</p>	<p>voice or data communications were addressed, such as voice recordings and operator logs.</p>		<p>General Comment: Each measure in this standard must specify the applicable entity to be consistent with previous standards.</p> <p>MR2 does not track to R2. R2 is about 24 hour staffing which means providing evidence like operator logs or shift schedules. This MR2 is about proving you did the right thing in a real time emergency which is different. TransAlta recommends this measure be rewritten.</p> <p>MR2 We believe that the word 'address' should be replaced with 'available'. TransAlta requests AESO to prove the reason for the difference in wording of this from the NERC standard.</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 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</p>	<p>MR4 Evidence exists to verify the requirement as specified in</p>	<p><input type="checkbox"/> New</p>	<p><input type="checkbox"/> Support <input type="checkbox"/> Support with language</p>	

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<p>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 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>requirement R4 such as, voice recordings, operator logs and email records.</p>	<p><input checked="" type="checkbox"/> Amended <input type="checkbox"/> Deleted</p> <p>Amended to align with requirement R4.</p>	<p>suggestions <input type="checkbox"/> Oppose</p> <p><i>Insert comments, reason for position, and alternate proposal (if any).</i></p>	
	<p>MR5 Evidence exists to verify the requirement as specified in requirement R5 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 R5.</p>	<p><input type="checkbox"/> Support <input type="checkbox"/> Support with language suggestions <input checked="" type="checkbox"/> Oppose</p> <p><i>Insert comments, reason for position, and alternate proposal (if any).</i></p> <p>MR5 Currently, all applicable entities are not mandated to have voice recording systems at each of their facilities. TransAlta suggests the AESO voice recording system could be used as proof of evidence that the entity is compliant with R5? Could this wording be added to MR5?</p>	

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			<p>We believe the determination of 'correct' lies with the ISO, not the operator receiving the directive. There is therefore nothing the operator can provide to demonstrate compliance without some type of confirmation from the ISO. The requirement only requires repetition back. The obligation to assess whether it is correct or not falls to the ISO under R4.</p>	
<p>Compliance To view the compliance section D of the NERC reliability standard follow this link: http://www.nerc.com/files/COM-002-2.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>	<p>None identified.</p>	<p>Not applicable in Alberta</p>		

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