

Stakeholder Comment Form

Alberta Reliability Standards Process

Proposed New Alberta Reliability Standards

Date of Request for Comment: September 9, 2009
Period of Consultation: September 9 through October 9, 2009

Comments From: Capital Power Corporation

Date: October 8, 2009

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Reliability Standard Number	Description	Stakeholder Comments
EOP-001-AB-1	Emergency Operations Planning	<p>The AESO has already developed authoritative documents to mitigate operating emergencies (i.e. OPP 801). Capital Power recommends that the AESO provide a reference table located on its website that indicates which of the current authoritative documents satisfy the AESO's obligation to implement emergency operations planning.</p> <p>It is important for market participants to understand how all of the AESO authoritative documents relate to one another so that compliance can be achieved. Capital Power suggests that all authoritative documents are drafted such that the duplication of requirements and the risk of contravention of multiple rules from a single infraction can be avoided.</p> <p>EOP-001-AB-1 requires that the ISO and the TFOs must develop, maintain, and implement a set of plans for system restoration. Capital Power understands that EOP-003-AB-1 also contains requirements for TFOs with respect to load shedding and therefore Capital Power recommends that the AESO also indicate this in a reference table located on the website.</p>
CIP-001-AB-1	Sabotage Reporting	

		<p>Capital Power is concerned about the Alberta Electric System Operator’s (AESO) stated intention to file for approval with the Alberta Utilities Commission (AUC) both Operating Policy and Procedure (OPP) 808 and Reliability Standard CIP-001-AB-01. Each of OPP 808 and CIP-001-AB-01 identify the obligations of the ISO and market participants relative to sabotage event reporting.</p> <p>Where there is overlapping subject matter in multiple authoritative documents, the subject matter should be consolidated into one authoritative document. Consolidation of authoritative documents by subject matter enables market participants to better comply and is an important step towards achieving a healthy culture of compliance. Authoritative documents must be drafted to provide clarity, transparency and certainty with regard to the rights, requirements and obligations of market participants (and the ISO). In order to achieve this goal, it is necessary to eliminate any overlaps, duplication and gaps with respect to content in authoritative documents. It is inefficient and unnecessary to develop multiple authoritative documents involving the same subject matter. By doing so, the AESO creates ambiguity and uncertainty which ultimately reduces the likelihood of achieving full compliance.</p> <p>Our most significant concern is that the AESO’s intended practice of developing duplicative rules and standards leads to the spectre of the assessment of multiple penalties on persons or entities for the same non-compliance. It is alarming that the AESO would knowingly create two authoritative documents containing the same requirements, with the potential that market participants would not be able to readily to ascertain the compliance regime under which these fall.</p> <p>Capital Power does not support the filing of both OPP 808 and Reliability Standard CIP-001-AB-01 with the AUC. We are of the view that the existence or creation of two authoritative documents with overlapping requirements is not in the public interest, can create conflicting compliance requirements, and do not support the fair and efficient operation of the market. We recommend that the AESO consolidate the content of the two authoritative documents into CIP-001-AB-01 and remove OPP 808 from the ISO rules.</p> <p>In addition, Capital Power notes that the definition of a sabotage event is not defined</p>
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		<p>in CIP-001-AB-01, nor is it included in the Reliability Standard glossary. It is difficult to assess our ability to comply with the standard if we are uncertain as to what the definition of a sabotage event is.</p> <p>OPP 808 defines sabotage events as “...incidents that prevent the ISO from carrying out its responsibilities, by affecting the reliable operation of the AIES. Examples would include but are not limited to: the deliberate destruction or damage of equipment, facilities, computer systems, communication systems and telecommunication systems used by the ISO, Transmission Facility Owner (TFOs) and Generation Facility Owner (GFOs).” This definition is extremely broad and places unreasonable administrative burdens on market participants.</p> <p>Furthermore Alberta has in place a Security Management Regulation that manages security measures for “critical facilities”, and “critical infrastructure,” as defined by the regulation, to establish security measures relating to critical facilities. The AESO needs to develop measures that correspond and do not duplicate requirements with that legislation. Once again Capital Power is concerned that CIP-001-AB-01 is creating duplicative requirements for market participants with respect to sabotage event reporting that could also be considered acts of terrorism.</p> <p>Finally, sabotage events may not be recognized immediately as such and not be reported as timely as when the event occurred making the entities appear non-compliant.</p>
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Please return this form with your comments by October 9, 2009, to:

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