

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: IPPSA
Date: October 9, 2009
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Reliability Standard Number	Description	Stakeholder Comments
EOP-001-AB-1	Emergency Operations Planning	<p>R2 The ISO should develop plans to mitigate operating emergencies arising from insufficient generation capacity in conjunction with affected parties. In particular any plans for conscription or restriction of generation should be developed in consultation with affected parties. Affected parties should be informed of the ISO's plans to mitigate operating emergencies arising from insufficient generation capacity.</p> <p>IPPSA assumes that the AESO has sufficient plans to mitigate operating emergencies (OPP 801, 750, 606, Rule 9.4, etc.) and is not contemplating any additional plans affecting generators. Is this assumption correct?</p> <p>R3 The ISO should develop plans to meet ISO transmission reliability operating criteria and mitigate operating emergencies on the transmission system in conjunction with affected parties. In particular, any plans for restricted operation of generation or load should be developed in consultation with affected parties. Affected parties should be informed of the ISO's plans to meet ISO transmission reliability operating criteria and mitigate operating emergencies on the transmission system.</p>

		<p>R5. As written the ISO and the TFO's must each develop, maintain, and implement a set of plans for load shedding. However, there is no requirement for coordination of these plans. It is suggested that the ISO should have the responsibility to coordinate the TFO's plans for load shedding and to ensure that load shedding plans and practices among TFO's are consistent with each other.</p> <p>M5. The measure should be that plans exist at both the ISO and the TFO's for implementing a set of plans for load shedding.</p> <p>R6. As written the ISO and the TFO's must each develop, maintain, and implement a set of plans for system restoration. However, there is no requirement for coordination of these plans. The ISO should have the responsibility to coordinate the TFO's plans for system restoration.</p> <p>R7.3 This requirement obligates the ISO to coordinate with adjacent markets, yet it does not describe who is ultimately responsible for the plan. We believe the AESO should be ultimately responsible for coordinating actions among the parties when contingencies occur within Alberta's market.</p> <p>M7. The measure should be that a coordination plan is in place at the ISO and TFO's.</p> <p>R9 and R10. The AESO should have the responsibility to gather and coordinate system restoration plans with TFO's and of communicating plans these to all TFO's, VRC and other external parties as required.</p>
CIP-001-AB-1	Sabotage Reporting	<p>The AESO must address the redundancy of this Sabotage Reliability Standard and its Sabotage Reporting OPP (808). Participants should only be obligated to adhere to one.</p> <p>The following are comments directed to the language of the Standard.</p> <p>Applicability: As stated this standard applies to Transmission Facility Owners (TFO) and Generation Facility Owners (GFO) and wire owners except those who only operate facilities below 25 kV. Although owners and operators are often the same</p>

		<p>entity they may not be. Instead of owners, this standard should apply to Transmission, Generation and Wire Operators. The rationale for excluding wire operators who exclusively operate facilities below 25 kV is not given. As currently written, the standard could apply to an owner/operator of a Distributed Generator (DG), but may not apply to the owner/operator of the distribution system to which the DG was connected.</p> <p>Requirement R1: Responsible entities must document and implement procedures for receiving information about sabotage. However, who is to receive this information, and from whom the information will come is not defined. It is suggested that the ISO is best positioned to play the role of information coordinator. In this case information flows from the responsible entity to the ISO and the ISO disseminates information back out to other entities as required. Also, responsible entities must document and implement procedures for receiving information from the ISO about sabotage and disseminating the information received from the ISO to the operating personnel that the responsible entity specifies.</p> <p>Measure: MR1. Sabotage events may not be recognized as such immediately. Suggest that measure be changed to; Evidence exists that procedures specified in Requirement R1 were implemented <u>upon the recognition</u> of a sabotage event.</p> <p>Requirement R2: It is unclear what the rationale is for broadening the requirement from “communicating information concerning sabotage events in accordance with ISO rule OPP 808” to “communicating information concerning sabotage events in accordance with ISO rules for sabotage reporting.” If other rules are applicable they should be specified.</p> <p>Measure M2: Sabotage events may not be recognized as such immediately. Suggest wording be changed to, “Evidence exists that the procedures specified in requirement R2 were implemented <u>upon recognition</u> of an occurrence of a sabotage event.</p> <p>Requirement R3: It is not clear why each responsible entity must provide its operating personnel with sabotage event response procedures on an annual basis. The requirement is not evident in the NERC standard and will not ensure that changes to the procedures are implemented in a timely manner. It is suggested that</p>
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		<p>the wording be revised to say, “Each responsible entity will provide its operating personnel with access to up to date sabotage event response procedures, including personnel to contact, for reporting sabotage events.”</p> <p>MR3: For the reasons outlined in suggested changes to R3 above, the measure MR3 should be amended to say, “Records indicate that operating personnel are provided access to sabotage event response procedures and related contact information.”</p> <p>MR4: Procedures specified in R4 are limited to identifying current communications contacts with local municipal police, the RCMP and the Alberta Security and Strategic Intelligence Support Team. This is something that is done prior to any sabotage events and updated on a periodic basis. The measure should be that records exist that current communication contacts are reviewed and updated within a 12 month period. The measure that evidence exists that procedures specified in requirement R4 were implemented upon an occurrence of a sabotage event should be dropped because, as written, it implies that following any sabotage event all records must be updated. This requirement is not part of R4.</p>
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Please return this form with your comments by October 9, 2009, to:

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