



Stakeholder Comparison Comment Rationale Matrix

2010-08-17

AESO AUTHORITATIVE DOCUMENT PROCESS

Alberta Reliability Standard – IRO-001-AB-1 Reliability Coordination Responsibilities and Authorities

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]: <u>2010/08/17</u>	Contact: <u>Kevin Neithercut</u>
Period of Consultation [yyyy/mm/dd]: <u>2010/08/17</u> through <u>2010/09/17</u>	Phone: <u>403-514-1544</u>
Comments From: <u>ENMAX Power Corporation</u>	E-mail: <u>kneithercut@enmax.com</u>
Date [yyyy/mm/dd]: <u>2010/08/18</u>	

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 IRO-001-1 AND ALBERTA IRO-001-AB-1

Reliability Coordination Responsibilities and Authorities

NERC IRO-001-1	Alberta IRO-001-AB-1	AESO Reason for Difference	Stakeholder Comments	AESO Replies
<p>Purpose Reliability Coordinators must have the authority, plans, and agreements in place to immediately direct reliability entities within their Reliability Coordinator Areas to re-dispatch generation, reconfigure transmission, or reduce load to mitigate critical conditions to return the system to a reliable state. If a Reliability Coordinator delegates tasks to others, the Reliability Coordinator retains its responsibilities for complying with NERC and regional standards. Standards of conduct are necessary to ensure the Reliability Coordinator does not act in a manner that favors one market participant over another.</p>	<p>Purpose The purpose of this reliability standard is to define the criteria by which the ISO must comply with Reliability Coordinator directives.</p>	<p>Deleted the obligations in the purpose that pertain to the Reliability Coordinator.</p> <p>Clarified the purpose to align with the content of the reliability standard.</p>		
<p>Applicability 4.1. Reliability Coordinators. 4.2. Regional Reliability Organizations. 4.3. Transmission Operator. 4.4. Balancing Authorities. 4.5. Generator Operators. 4.6. Transmission Service Providers. 4.7. Load-Serving Entities. 4.8. Purchasing-Selling Entities.</p>	<p>Applicability This reliability standard applies to the following: <ul style="list-style-type: none"> the ISO. </p>	<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 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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<p>Effective Date January 1, 2007</p>	<p>Effective Date Ninety (90) 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 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>R1. Each Regional Reliability Organization, subregion, or interregional coordinating group shall establish one or more Reliability Coordinators to continuously assess transmission reliability and coordinate emergency operations among the operating entities within the region and across the regional boundaries.</p>		<p><input type="checkbox"/> New <input type="checkbox"/> Amended <input checked="" type="checkbox"/> Deleted</p> <p>Alberta Variance: NERC R1 only applies to the Regional Reliability Organization. Not applicable in Alberta.</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. The Reliability Coordinator shall comply with a regional reliability plan approved by the NERC Operating Committee.</p>		<p><input type="checkbox"/> New <input type="checkbox"/> Amended <input checked="" type="checkbox"/> Deleted</p> <p>Alberta Variance: NERC R2 only applies to the Regional Reliability Organization. Not applicable in Alberta.</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>R3. The Reliability Coordinator shall have clear decision-making authority to act and to direct actions to be taken by Transmission Operators,</p>		<p><input type="checkbox"/> New <input type="checkbox"/> Amended <input checked="" 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>Balancing Authorities, Generator Operators, Transmission Service Providers, Load-Serving Entities, and Purchasing- Selling Entities within its Reliability Coordinator Area to preserve the integrity and reliability of the Bulk Electric System. These actions shall be taken without delay, but no longer than 30 minutes.</p>		<p>Alberta Variance: NERC R3 only applies to the Regional Reliability Organization. Not applicable in Alberta.</p>	<p><i>Insert comments, reason for position, and alternate proposal (if any).</i></p>	
<p>R4. Reliability Coordinators that delegate tasks to other entities shall have formal operating agreements with each entity to which tasks are delegated. The Reliability Coordinator shall verify that all delegated tasks are understood, communicated, and addressed within its Reliability Coordinator Area. All responsibilities for complying with NERC and regional standards applicable to Reliability Coordinators shall remain with the Reliability Coordinator.</p>		<p><input type="checkbox"/> New <input type="checkbox"/> Amended <input checked="" type="checkbox"/> Deleted</p> <p>Alberta Variance: NERC R4 only applies to the Regional Reliability Organization. Not applicable in Alberta.</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>R5. The Reliability Coordinator shall list within its reliability plan all entities to which the Reliability Coordinator has delegated required tasks.</p>		<p><input type="checkbox"/> New <input type="checkbox"/> Amended <input checked="" type="checkbox"/> Deleted</p> <p>Alberta Variance: NERC R5 only applies to the Regional Reliability Organization. Not applicable in Alberta.</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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<p>R6. The Reliability Coordinator shall verify that all delegated tasks are carried out by NERC-certified Reliability Coordinator operating personnel.</p>		<p><input type="checkbox"/> New <input type="checkbox"/> Amended <input checked="" type="checkbox"/> Deleted</p> <p>Alberta Variance: NERC R6 only applies to the Regional Reliability Organization. Not applicable in Alberta.</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>R7. The Reliability Coordinator shall have clear, comprehensive coordination agreements with adjacent Reliability Coordinators to ensure that System Operating Limit or Interconnection Reliability Operating Limit violation mitigation requiring actions in adjacent Reliability Coordinator Areas are coordinated.</p>		<p><input type="checkbox"/> New <input type="checkbox"/> Amended <input checked="" type="checkbox"/> Deleted</p> <p>Alberta Variance: NERC R7 only applies to the Regional Reliability Organization. Not applicable in Alberta.</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>R8. Transmission Operators, Balancing Authorities, Generator Operators, Transmission Service Providers, Load-Serving Entities, and Purchasing-Selling Entities shall comply with Reliability Coordinator directives unless such actions would violate safety, equipment, or regulatory or statutory requirements. Under these circumstances, the Transmission Operator, Balancing</p>	<p>R1. The ISO must comply with a Reliability Coordinator directive unless:</p> <p>a) complying is not within the physical capabilities of the interconnected electric system;</p> <p>b) complying would create serious or immediate risks to human health or safety;</p>	<p><input type="checkbox"/> New <input checked="" type="checkbox"/> Amended <input type="checkbox"/> Deleted</p> <p>NERC requirement has been split into two requirements to add clarity.</p> <p>Alberta Variance: With respect to NERC Requirement R8, the AESO is the only Alberta entity that interacts</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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<p>Authority, Generator Operator, Transmission Service Provider, Load-Serving Entity, or Purchasing-Selling Entity shall immediately inform the Reliability Coordinator of the inability to perform the directive so that the Reliability Coordinator may implement alternate remedial actions.</p>	<p>c) complying would create a real and substantial risk of undue injury to the environment;</p> <p>d) complying would create an immediate risk of damage to facilities or equipment within the interconnected electric system or cause the operation of any electrical facilities or equipment within the interconnected electric system in an unsafe manner;</p> <p>e) complying would cause the ISO to violate any applicable law, regulation, lawfully promulgated rule or order, or other legal obligation, or any provision of the reliability standards;</p> <p>f) complying would conflict with any other legal requirements whatsoever, including any court or administrative orders;</p> <p>g) complying would contravene constitutional or legislative limitations with respect to the ISO's ability to delegate authority or discretion over its operations to another party; or</p>	<p>with the WECC Reliability Coordinator. The AESO will operate as contemplated in the WECC-AESO Membership and Operating Agreement.</p>		

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	<p>h) complying would contravene the ISO's statutory obligations.</p> <p>R2. The ISO must immediately notify the WECC Reliability Coordinator that the ISO has determined it cannot comply with a Reliability Coordinator directive in accordance with requirement R1 so that the WECC Reliability Coordinator may implement alternate remedial actions.</p>			
<p>R9. The Reliability Coordinator shall act in the interests of reliability for the overall Reliability Coordinator Area and the Interconnection before the interests of any other entity.</p>		<p><input type="checkbox"/> New <input type="checkbox"/> Amended <input checked="" type="checkbox"/> Deleted</p> <p>Alberta Variance: NERC R9 only applies to the Regional Reliability Organization. Not applicable in Alberta.</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>M1. Each Regional Reliability Organization shall have, and provide upon request, evidence that could include, but is not limited to signed agreements or other equivalent evidence that will be used to confirm that it established one or more Reliability Coordinators to continuously assess transmission reliability and coordinate emergency</p>		<p><input type="checkbox"/> New <input type="checkbox"/> Amended <input checked="" type="checkbox"/> Deleted</p> <p>Deleted to align with the removal of NERC requirement R1</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>	

COMPARISON BETWEEN NERC IRO-001-1 AND ALBERTA IRO-001-AB-1

Reliability Coordination Responsibilities and Authorities

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operations among the operating entities within the region and across the regional boundaries as described in Requirement 1.				
M2. Each Reliability Coordinator shall have and provide upon request evidence that could include, but is not limited to, job descriptions, signed agreements, an authority letter signed by an officer of the company, or other equivalent evidence that will be used to confirm that the Reliability Coordinator has the authority to act as described in Requirement 3.		<input type="checkbox"/> New <input type="checkbox"/> Amended <input checked="" type="checkbox"/> Deleted Deleted to align with the removal of NERC requirement R2	<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>	
M3. The Reliability Coordinator shall have and provide upon request current formal operating agreements with entities that have been delegated any Reliability Coordinator tasks (Requirement 4 Part 1).		<input type="checkbox"/> New <input type="checkbox"/> Amended <input checked="" type="checkbox"/> Deleted Deleted to align with the removal of NERC requirement R3	<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>	
M4. The Reliability Coordinator shall have and provide upon request evidence that could include, but is not limited to, job descriptions, signed agreements, records of training sessions, monitoring procedures or other equivalent evidence that will be used to confirm that all delegated tasks are understood, communicated,		<input type="checkbox"/> New <input type="checkbox"/> Amended <input checked="" type="checkbox"/> Deleted Deleted to align with the removal of NERC requirement R4	<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>	

COMPARISON BETWEEN NERC IRO-001-1 AND ALBERTA IRO-001-AB-1

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and addressed within its Reliability Coordinator Area (Requirement 4 Part 2 and Requirement 5)				
M5. The Reliability Coordinator shall have and provide upon request evidence that could include, but is not limited to, records that show each operating person assigned to perform a Reliability Coordinator delegated task has a NERC Reliability Coordinator certification credential, or equivalent evidence confirming that delegated tasks were carried out by NERC certified Reliability Coordinator operating personnel, as specified in Requirement 6.		<input type="checkbox"/> New <input type="checkbox"/> Amended <input checked="" type="checkbox"/> Deleted Deleted to align with the removal of NERC 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>	
M6. The Reliability Coordinator shall have and provide upon request as evidence, signed agreements with adjacent Reliability Coordinators that will be used to confirm that it will coordinate corrective actions in the event SOL and IROL mitigation actions within neighboring areas must be taken. (Requirement 7)		<input type="checkbox"/> New <input type="checkbox"/> Amended <input checked="" type="checkbox"/> Deleted Deleted to align with the removal of NERC requirement R6	<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>	
M7. Each Transmission Operator, Balancing Authority, Generator Operator, Transmission Service Provider, Load-Serving Entity, or Purchasing-Selling Entity shall have and provide upon request evidence that could include, but is not limited		<input type="checkbox"/> New <input type="checkbox"/> Amended <input checked="" type="checkbox"/> Deleted Deleted to align with the removal of NERC requirement R7	<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>	

COMPARISON BETWEEN NERC IRO-001-1 AND ALBERTA IRO-001-AB-1

Reliability Coordination Responsibilities and Authorities

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<p>to, operator logs, voice recordings or transcripts of voice recordings, or other equivalent evidence that will be used to confirm that it did comply with the Reliability Coordinator's directives, or if for safety, equipment, regulatory or statutory requirements it could not comply, it informed the Reliability Coordinator immediately. (Requirement 8)</p>			<p><i>any).</i></p>	
	<p>MR1. Evidence, such as logs, voice recordings, electronic tags, electronic communications, metering or other data, exists and confirms the ISO complied with the WECC Reliability Coordinator directive as specified in requirement R1. Where the ISO did not follow a WECC Reliability Coordinator directive, evidence exists to demonstrate one, or more, of the exceptions noted in requirement R1.</p> <p>MR2. Evidence, such as logs, voice recordings, electronic communications, disturbance reports, exists and confirms notification occurred as specified in requirement R2.</p>	<p><input checked="" type="checkbox"/> New <input type="checkbox"/> Amended <input type="checkbox"/> Deleted</p> <p>Added 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>Compliance To view the compliance section D of the NERC reliability standard follow</p>		<p>The Alberta reliability standards do not contain a compliance section.</p>		

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this link: http://www.nerc.com/files/IRO-001-1_1.pdf		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 “Reliability Coordinator directive” means a direction that the WECC Reliability Coordinator gives to the ISO .	<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>	
(b) Removals N/A		
(c) Amendments N/A		