



Stakeholder Comparison Comment Rationale Matrix

2010-08-05

AESO AUTHORITATIVE DOCUMENT PROCESS

Alberta Reliability Standard – IRO-005-AB-3 Reliability Coordination Current Day Operations

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]: 2010/08/05
Period of Consultation [yyyy/mm/dd]: 2010/08/05 through 2010/09/02
Comments From: TransCanada Energy Ltd. (TransCanada)
Date [yyyy/mm/dd]: 2010/09/02

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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-005-3 AND ALBERTA IRO-005-AB-3

RELIABILITY COORDINATION CURRENT DAY OPERATIONS

NERC IRO-005-3	Alberta IRO-005-AB-3	AESO Reason for Difference	Stakeholder Comments	AESO Replies
<p>Purpose The Reliability Coordinator must be continuously aware of conditions within its Reliability Coordinator Area and include this information in its reliability assessments. The Reliability Coordinator must monitor Bulk Electric System parameters that may have significant impacts upon the Reliability Coordinator Area and neighboring Reliability Coordinator Areas.</p>	<p>Purpose The purpose of this reliability standard is to ensure that the WECC Reliability Coordinator is notified of remedial action scheme failures and that the lowest system operating limits are used between the interconnected electric system and adjacent balancing authority areas.</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. Transmission Service Providers. 4.5. Generator Operators. 4.6. Load-Serving Entities. 4.7. Purchasing-Selling Entities.</p>	<p>Applicability This reliability standard applies to:</p> <ul style="list-style-type: none"> the legal owner of a transmission facility that owns a remedial action scheme or equipment integral to a remedial action scheme that is listed as a WECC RAS in the ISO's RAS database as published on the AESO website, and as may be amended from time to time by the ISO on notice to market participants; the operator of a transmission facility that owns a remedial action scheme or equipment integral to a remedial action scheme that is listed as a WECC RAS in the ISO's RAS database as published on the AESO 	<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>The Alberta Reliability Standards section of the AESO website, and in particular the section that contains this reliability standard, will contain reference to the ISO RAS database. The ISO RAS database is currently available on the AESO website, under current Alberta Reliability Standard PRC-001-AB-1 Protection System Coordination.</p>	<p><input type="checkbox"/> Support <input type="checkbox"/> Support with language suggestions <input checked="" type="checkbox"/> Oppose</p> <p>As TransCanada has discussed with the AESO, there is considerable uncertainty and confusion in the industry with respect to the TFO classification or the recently introduced "legal owner of a transmission facility" or "operator of a transmission facility" .</p> <p>There is also misalignment between the terms used for generators in reliability standards, such as "legal owner of a</p>	

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	<p>website, and as may be amended from time to time by the ISO on notice to market participants;</p> <ul style="list-style-type: none"> • the legal owner of a generating unit that owns a remedial action scheme or equipment integral to a remedial action scheme that is listed as a WECC RAS in the ISO's RAS database as published on the AESO website, and as may be amended from time to time by the ISO on notice to market participants; • the operator of a generating unit that owns a remedial action scheme or equipment integral to a remedial action scheme that is listed as a WECC RAS in the ISO's RAS database as published on the AESO website, and as may be amended from time to time by the ISO on notice to market participants; • the ISO. 		<p>generating unit” and “operator of a generating unit”, and terms used in the AESO Compliance Monitoring program, such as “Generator Facility Owner” and “Generator Operator”</p> <p>Until this is resolved TransCanada cannot support the development or approval of any further reliability standards that are applicable to TFOs or legal owners or operators of a transmission facility.</p> <p>TransCanada recommends that the AESO initiate a process engaging all stakeholders to resolve this issue</p>	

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<p>Effective Date In those jurisdictions where no regulatory approval is required, the standard shall become effective on the latter of either April 1, 2009 or the first day of the first calendar quarter, three months after BOT adoption. In those jurisdictions where regulatory approval is required, the standard shall become effective on the latter of either April 1, 2009 or the first day of the first calendar quarter, three months after applicable regulatory approval.</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 type="checkbox"/> Oppose</p> <p><i>Insert comments, reason for position, and alternate proposal (if any).</i></p>	
<p>R1. Each Reliability Coordinator shall monitor its Reliability Coordinator Area parameters, including but not limited to the following:</p> <p>R1.1. Current status of Bulk Electric System elements (transmission or generation including critical auxiliaries such as Automatic Voltage Regulators and Special Protection Systems) and system loading.</p> <p>R1.2. Current pre-contingency element conditions (voltage, thermal, or stability), including any applicable mitigation plans to alleviate SOL or IROL violations, including the plan's viability and scope.</p>		<p><input type="checkbox"/> New <input type="checkbox"/> Amended <input checked="" type="checkbox"/> Deleted</p> <p>Amended for clarity and consistency.</p> <p>Alberta Variance: NERC Requirement R1 and its sub-requirements apply to Reliability Coordinators and therefore is not applicable to any entities in Alberta.</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>	

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<p>R1.3. Current post-contingency element conditions (voltage, thermal, or stability), including any applicable mitigation plans to alleviate SOL or IROL violations, including the plan's viability and scope.</p> <p>R1.4. System real and reactive reserves (actual versus required).</p> <p>R1.5. Capacity and energy adequacy conditions.</p> <p>R1.6. Current ACE for all its Balancing Authorities.</p> <p>R1.7. Current local or Transmission Loading Relief procedures in effect.</p> <p>R1.8. Planned generation dispatches.</p> <p>R1.9. Planned transmission or generation outages.</p> <p>R1.10. Contingency events.</p>				
<p>R2. Each Reliability Coordinator shall monitor its Balancing Authorities' parameters to ensure that the required amount of operating reserves is provided and available as required to meet the Control</p>		<p><input type="checkbox"/> New <input type="checkbox"/> Amended <input checked="" type="checkbox"/> Deleted</p> <p>Alberta Variance: NERC Requirement R2 applies to Reliability</p>	<p><input type="checkbox"/> Support <input type="checkbox"/> Support with language suggestions <input type="checkbox"/> Oppose</p> <p><i>Insert comments, reason for</i></p>	

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NERC IRO-005-3	Alberta IRO-005-AB-3	AESO Reason for Difference	Stakeholder Comments	AESO Replies
<p>Performance Standard and Disturbance Control Standard requirements. If necessary, the Reliability Coordinator shall direct the Balancing Authorities in the Reliability Coordinator Area to arrange for assistance from neighboring Balancing Authorities. The Reliability Coordinator shall issue Energy Emergency Alerts as needed and at the request of its Balancing Authorities and Load-Serving Entities.</p>		<p>Coordinators and therefore is not applicable to any entities in Alberta.</p>	<p><i>position, and alternate proposal (if any).</i></p>	
<p>R3. Each Reliability Coordinator shall ensure its Transmission Operators and Balancing Authorities are aware of Geo-Magnetic Disturbance (GMD) forecast information and assist as needed in the development of any required response plans.</p>		<p> <input type="checkbox"/> New <input type="checkbox"/> Amended <input checked="" type="checkbox"/> Deleted Alberta Variance: NERC Requirement R3 applies to Reliability Coordinators and therefore is not applicable to any entities in Alberta. </p>	<p> <input 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> </p>	
<p>R4. The Reliability Coordinator shall disseminate information within its Reliability Coordinator Area, as required.</p>		<p> <input type="checkbox"/> New <input type="checkbox"/> Amended <input checked="" type="checkbox"/> Deleted Alberta Variance: NERC Requirement R4 applies to Reliability Coordinators and therefore is not applicable to any entities in Alberta. </p>	<p> <input 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> </p>	

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<p>R5. Each Reliability Coordinator shall monitor system frequency and its Balancing Authorities' performance and direct any necessary rebalancing to return to CPS and DCS compliance. The Transmission Operators and Balancing Authorities shall utilize all resources, including firm load shedding, as directed by its Reliability Coordinator to relieve the emergent condition.</p>		<p><input type="checkbox"/> New <input type="checkbox"/> Amended <input checked="" type="checkbox"/> Deleted</p> <p>Alberta Variance: NERC Requirement R5 was not included in this Alberta reliability standard as IRO-001-AB-1 R1 covers all WECC Reliability Coordinator directives to the ISO.</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>R6. The Reliability Coordinator shall coordinate with Transmission Operators, Balancing Authorities, and Generator Operators as needed to develop and implement action plans to mitigate potential or actual SOL, CPS, or DCS violations. The Reliability Coordinator shall coordinate pending generation and transmission maintenance outages with Transmission Operators, Balancing Authorities, and Generator Operators as needed in both the real time and next-day reliability analysis timeframes.</p>		<p><input type="checkbox"/> New <input type="checkbox"/> Amended <input checked="" type="checkbox"/> Deleted</p> <p>Alberta Variance: NERC Requirement R6 applies to Reliability Coordinators and therefore is not applicable to any entities in Alberta.</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>R7. As necessary, the Reliability Coordinator shall assist the Balancing Authorities in its Reliability Coordinator Area in arranging for assistance from neighboring Reliability Coordinator Areas or</p>		<p><input type="checkbox"/> New <input type="checkbox"/> Amended <input checked="" type="checkbox"/> Deleted</p> <p>Alberta Variance: NERC</p>	<p><input type="checkbox"/> Support <input type="checkbox"/> Support with language suggestions <input type="checkbox"/> Oppose</p> <p><i>Insert comments, reason for</i></p>	

COMPARISON BETWEEN NERC IRO-005-3 AND ALBERTA IRO-005-AB-3

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NERC IRO-005-3	Alberta IRO-005-AB-3	AESO Reason for Difference	Stakeholder Comments	AESO Replies
Balancing Authorities.		Requirement R7 applies to Reliability Coordinators and therefore is not applicable to any entities in Alberta.	<i>position, and alternate proposal (if any).</i>	
<p>R8. The Reliability Coordinator shall identify sources of large Area Control Errors that may be contributing to Frequency Error, Time Error, or Inadvertent Interchange and shall discuss corrective actions with the appropriate Balancing Authority. The Reliability Coordinator shall direct its Balancing Authority to comply with CPS and DCS.</p>		<input type="checkbox"/> New <input type="checkbox"/> Amended <input checked="" type="checkbox"/> Deleted Alberta Variance: NERC Requirement R8 applies to Reliability Coordinators and therefore is not applicable to any entities in Alberta.	<input 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>	
<p>R9. Whenever a Special Protection System that may have an inter-Balancing Authority, or inter-Transmission Operator impact (e.g., could potentially affect transmission flows resulting in a SOL or IROL violation) is armed, the Reliability Coordinators shall be aware of the impact of the operation of that Special Protection System on inter-area flows. The Transmission Operator shall immediately inform the Reliability Coordinator of the status of the Special Protection System including any degradation or potential failure to operate as expected.</p>	<p>R1. Any operator of a generating unit or a transmission facility must notify the ISO, as soon as practical, of any status change of a remedial action scheme that is listed as a WECC RAS in the ISO's RAS database and that results in, or may result in, the failure of the remedial action scheme to operate as designed.</p> <p>R2. Subject to receipt of notification as specified under requirement R1, the ISO must notify the WECC Reliability Coordinator of such status change.</p>	<input type="checkbox"/> New <input checked="" type="checkbox"/> Amended <input type="checkbox"/> Deleted Amended for clarity and consistency. Alberta Variance: The first sentence of the NERC requirement R9 applies to Reliability Coordinators and therefore is not applicable to any entities in Alberta. Alberta Variance: NERC requirement R9 states that degradation of RAS is to be reported to the reliability coordinator, however it is the opinion of the AESO that degradation is not	<input 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>	

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		<p>measurable. The AESO's opinion is that it is reasonable to notify the reliability coordinator of a RAS status change that results in the failure of a RAS to operate as designed, and the requirement has been written as such.</p> <p>Alberta Variance: Split the NERC requirement R9 in two to separately identify market participant and AESO responsibilities.</p>		
<p>R10. In instances where there is a difference in derived limits, the Transmission Operators, Balancing Authorities, Generator Operators, Transmission Service Providers, Load-Serving Entities, and Purchasing-Selling Entities shall always operate the Bulk Electric System to the most limiting parameter.</p>	<p>R3. If there is a difference in system operating limits on an interconnection between the interconnected electric system and an adjacent balancing authority area, the ISO must operate the interconnected electric system to the lowest of such system operating limits.</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 type="checkbox"/> Oppose</p> <p><i>Insert comments, reason for position, and alternate proposal (if any).</i></p>	
<p>R11. The Transmission Service Provider shall respect SOLs and IROLs in accordance with filed tariffs and regional Total Transfer Calculation and Available Transfer Calculation processes.</p>		<p><input type="checkbox"/> New <input type="checkbox"/> Amended <input checked="" type="checkbox"/> Deleted</p> <p>Alberta Variance: NERC requirement R11 implies separate entities for Transmission Service Provider and the entity that establishes SOLs and IROLs. As</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>	

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		legislated by the <i>Electric Utilities Act</i> , the AESO is both the transmission service provider in Alberta (Section 17(g)) and is the responsible entity for calculating available transfer capability and total transfer capability through the establishment of SOLs and IROs (17(h)). Therefore this requirement is redundant and not required to be included in this reliability standard.		
<p>R12. Each Reliability Coordinator who foresees a transmission problem (such as an SOL or IROL violation, loss of reactive reserves, etc.) within its Reliability Coordinator Area shall issue an alert to all impacted Transmission Operators and Balancing Authorities in its Reliability Coordinator Area without delay. The receiving Reliability Coordinator shall disseminate this information to its impacted Transmission Operators and Balancing Authorities. The Reliability Coordinator shall notify all impacted Transmission Operators, Balancing Authorities, when the transmission problem has been mitigated.</p>		<input type="checkbox"/> New <input type="checkbox"/> Amended <input checked="" type="checkbox"/> Deleted Alberta Variance: NERC Requirement R12 applies to Reliability Coordinators and therefore is not applicable to any entities in Alberta.	<input 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>	
<p>M1. The Reliability Coordinator shall have and provide upon request</p>		<input type="checkbox"/> New <input type="checkbox"/> Amended	<input type="checkbox"/> Support <input type="checkbox"/> Support with language	

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<p>evidence that could include, but is not limited to, Energy Management System description documents, computer printouts, a prepared report specifically detailing compliance to each of the bullets in Requirement 1, EMS availability, SCADA data collection system communications performance or equivalent evidence that will be used to confirm that it monitors the Reliability Coordinator Area parameters specified in Requirements 1.1 through 1.9.</p>		<p><input checked="" type="checkbox"/> Deleted</p> <p>Deleted to align with the removal of NERC requirement R1</p>	<p>suggestions <input type="checkbox"/> Oppose</p> <p><i>Insert comments, reason for position, and alternate proposal (if any).</i></p>	
<p>M2. If one of its Balancing Authorities has insufficient operating reserves, the Reliability Coordinator shall have and provide upon request evidence that could include, but is not limited to computer printouts, operating logs, voice recordings or transcripts of voice recordings, or equivalent evidence that will be used to determine if the Reliability Coordinator directed and, if needed, assisted the Balancing Authorities in the Reliability Coordinator Area to arrange for assistance from neighboring Balancing Authorities. (Requirement 2 and Requirement 7)</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 R2</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>M3. The Reliability Coordinator shall have and provide upon request evidence that could include, but is not</p>		<p><input type="checkbox"/> New <input type="checkbox"/> Amended <input checked="" type="checkbox"/> Deleted</p>	<p><input type="checkbox"/> Support <input type="checkbox"/> Support with language suggestions</p>	

COMPARISON BETWEEN NERC IRO-005-3 AND ALBERTA IRO-005-AB-3

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<p>limited to, operator logs, voice recordings or transcripts of voice recordings, electronic communications or equivalent evidence that will be used to determine if it informed Transmission Operators and Balancing Authorities of Geo-Magnetic Disturbance (GMD) forecast information and provided assistance as needed in the development of any required response plans. (Requirement 3)</p>		<p>Deleted to align with the removal of NERC requirement R3</p>	<p><input type="checkbox"/> Oppose</p> <p><i>Insert comments, reason for position, and alternate proposal (if any).</i></p>	
<p>M4. The Reliability Coordinator shall have and provide upon request evidence that could include, but is not limited to, operator logs, voice recordings or transcripts of voice recordings, Hot Line recordings, electronic communications or equivalent evidence that will be used to determine if it disseminated information within its Reliability Coordinator Area in accordance with Requirement 4.</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 R4</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>M5. The Reliability Coordinator shall have and provide upon request evidence that could include, but is not limited to, computer printouts, operator logs, voice recordings or transcripts of voice recordings, electronic communications or equivalent evidence that will be used</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 R5</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>	

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to confirm that it monitored system frequency and Balancing Authority performance and directed any necessary rebalancing, as specified in Requirement 5 Part 1.				
M6. The Transmission Operators and Balancing Authorities 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 equivalent evidence that will be used to confirm that it utilized all resources, including firm load shedding, as directed by its Reliability Coordinator, to relieve an emergent condition. (Requirement 5 Part 2)		<input type="checkbox"/> New <input type="checkbox"/> Amended <input checked="" type="checkbox"/> Deleted Deleted to align with the removal of NERC requirement R6	<input 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. The Reliability Coordinator shall have and provide upon request evidence that could include, but is not limited to, voice recordings or transcripts of voice recordings, electronic communications, operator logs or equivalent evidence that will be used to determine if it coordinated with Transmission Operators, Balancing Authorities, and Generator Operators as needed to develop and implement action plans to mitigate potential or actual SOL, CPS, or DCS violations including the coordination		<input type="checkbox"/> New <input type="checkbox"/> Amended <input checked="" type="checkbox"/> Deleted Deleted to align with the removal of NERC requirement R7	<input 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>	

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of pending generation and transmission maintenance outages with Transmission Operators, Balancing Authorities and Generator Operators. (Requirement 6 Part 1)				
<p>M8. If a large Area Control Error has occurred, the Reliability Coordinator shall have and provide upon request evidence that could include, but is not limited to, operator logs, voice recordings or transcripts of voice recordings, Hot Line recordings, electronic communications or equivalent evidence that will be used to determine if it identified sources of the Area Control Errors, and initiated corrective actions with the appropriate Balancing Authority if the problem was within the Reliability Coordinator's Area (Requirement 8 Part 1)</p>		<input type="checkbox"/> New <input type="checkbox"/> Amended <input checked="" type="checkbox"/> Deleted Deleted to align with the removal of NERC requirement R8	<input 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>	
<p>M9. If a Special Protection System is armed and that system could have had an inter-area impact, the Reliability Coordinator shall have and provide upon request evidence that could include, but is not limited to, agreements with their Transmission Operators, procedural documents, operator logs, computer analysis, training modules, training records or equivalent evidence that will be used</p>	<p>MR1. Evidence exists that the operator notified the ISO as specified in requirement R1, such as voice recordings, electronic communications or other equivalent evidence.</p> <p>MR2. Evidence exists that the ISO notified the WECC Reliability Coordinator as specified in requirement R2, such as voice</p>	<input type="checkbox"/> New <input checked="" type="checkbox"/> Amended <input type="checkbox"/> Deleted Amended to align with requirements R1 and R2.	<input type="checkbox"/> Support <input checked="" type="checkbox"/> Support with language suggestions <input type="checkbox"/> Oppose TransCanada appreciates the AESO providing some guidance through examples of evidence which might fulfill the requirements however it must be noted that these are permissive statements	

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<p>to confirm that it was aware of the impact of that Special Protection System on inter-area flows. (Requirement 9)</p>	<p>recordings, electronic communications or other equivalent evidence.</p>		<p>and not exclusionary and there may be other forms of evidence which also fulfill the requirement.</p> <p>Also, the terminology should be consistent across standards, with all standards giving examples using the same wordings (“such as” in this standard, both “may include” and “could include” in PER-005)</p>	
<p>M10. If there is an instance where there is a disagreement on a derived limit, the Transmission Operator, Balancing Authority, Generator Operator, Load-serving Entity, Purchasing-selling Entity and Transmission Service Provider involved in the disagreement shall have and provide upon request evidence that could include, but is not limited to, operator logs, voice recordings, electronic communications or equivalent evidence that will be used to determine if it operated to the most limiting parameter. (Part 2 of Requirement 10)</p>	<p>MR3. Evidence exists that the ISO operated to the lowest system operating limit as specified in requirement R3, such as a record of voice recordings, electronic communications, operator logs, or other equivalent evidence exists to show that the ISO operated.</p>	<p><input type="checkbox"/> New <input checked="" type="checkbox"/> Amended <input type="checkbox"/> Deleted</p> <p>Amended to align with requirement R3.</p>	<p><input type="checkbox"/> Support <input checked="" type="checkbox"/> Support with language suggestions <input type="checkbox"/> Oppose</p> <p>TransCanada appreciates the AESO providing some guidance through examples of evidence which might fulfill the requirements however it must be noted that these are permissive statements and not exclusionary and there may be other forms of evidence which also fulfill the requirement.</p> <p>Also, the terminology should be consistent across standards, with all standards giving examples using the same wordings (“such as” in this standard, both “may include” and “could include” in</p>	

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RELIABILITY COORDINATION CURRENT DAY OPERATIONS

NERC IRO-005-3	Alberta IRO-005-AB-3	AESO Reason for Difference	Stakeholder Comments	AESO Replies
<p>M11. The Transmission Service Providers shall have and provide upon request evidence that could include, but is not limited to, procedural documents, operator logs, voice recordings or transcripts of voice recordings, electronic communications or equivalent evidence that will be used to confirm that it respected the SOLs or IROLs in accordance with filed tariffs and regional Total Transfer Calculation and Available Transfer Calculation processes.(Requirement 11 Part 2)</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 R11.</p>	<p>PER-005)</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>M12. The Reliability Coordinator 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 equivalent evidence that will be used to confirm that it issued alerts when it foresaw a transmission problem (such as an SOL or IROL violation, loss of reactive reserves, etc.) within its Reliability Coordinator Area, to all impacted Transmission Operators and Balancing Authorities in its Reliability Coordinator Area as specified in Requirement 12 Part 1.</p>		<p> <input type="checkbox"/> New <input type="checkbox"/> Amended <input checked="" type="checkbox"/> Deleted </p> <p>NERC Measures M12, M13, and M14 apply to Reliability Coordinators and therefore are not applicable to any entities in Alberta.</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>	

COMPARISON BETWEEN NERC IRO-005-3 AND ALBERTA IRO-005-AB-3
RELIABILITY COORDINATION CURRENT DAY OPERATIONS

NERC IRO-005-3	Alberta IRO-005-AB-3	AESO Reason for Difference	Stakeholder Comments	AESO Replies
<p>M13. The Reliability Coordinator 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 equivalent evidence that will be used to confirm that upon receiving information such as an SOL or IROL violation, loss of reactive reserves, etc. it disseminated the information to its impacted Transmission Operators and Balancing Authorities as specified in Requirement 12 Part 2.</p> <p>M14. The Reliability Coordinator 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 equivalent evidence that will be used to confirm that it notified all impacted Transmission Operators, Balancing Authorities and Reliability Coordinators when a transmission problem has been mitigated. (Requirement 12 Part 3)</p>				
Compliance				

COMPARISON BETWEEN NERC IRO-005-3 AND ALBERTA IRO-005-AB-3
RELIABILITY COORDINATION CURRENT DAY OPERATIONS

NERC IRO-005-3	Alberta IRO-005-AB-3	AESO Reason for Difference	Stakeholder Comments	AESO Replies
To view the compliance section D of the NERC reliability standard follow this link: http://www.nerc.com/files/IRO-005-3.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 NA		
(b) Removals N/A		
(c) Amendments N/A		