



**Stakeholder Comparison Comment Rationale Matrix**

**2010-08-05**

**AESO AUTHORITATIVE DOCUMENT PROCESS**

**Alberta Reliability Standard – PER-003-AB-0 Operating Personnel Credentials**

*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>2010/08/05</u>	Contact: <u>Neil Curtis</u>
Period of Consultation [yyyy/mm/dd]: <u>2010/08/05</u> through <u>2010/09/02</u>	Phone: <u>403-705-5221</u>
Comments From: <u>Nexen Inc.</u>	E-mail: <u><a href="mailto:ars_comments@aesocanada.com">ars_comments@aesocanada.com</a></u>
Date [yyyy/mm/dd]: <u>2010-09-02</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 PER-003-0 AND ALBERTA PER-003-AB-0

Operating Personnel Credentials

NERC PER-003-0	Alberta PER-003-AB-0	AESO Reason for Difference	Stakeholder Comments	AESO Replies
<p><b>Purpose</b> Certification of operating personnel is necessary to ensure minimum competencies for operating a reliable Bulk Electric System.</p>	<p><b>Purpose</b> The purpose of this <b>reliability standard</b> is to ensure that real-time operating personnel responsible for the reliable operation of the <b>bulk electric system</b> hold appropriate <b>NERC</b> certifications.</p>	<p>Clarified the purpose to align with the content of the reliability standard.</p>		
<p><b>Applicability</b> 4.1. Transmission Operators. 4.2. Balancing Authorities. 4.3. Reliability Coordinators.</p>	<p><b>Applicability</b> This <b>reliability standard</b> applies to the following:</p> <ul style="list-style-type: none"> <li>the <b>operator</b> of a <b>transmission facility</b> that operates or directs the operation of any portion of the <b>bulk electric system</b>; and</li> <li>the ISO.</li> </ul> <p>This <b>reliability standard</b> does not apply to:</p> <ul style="list-style-type: none"> <li>the <b>operator</b> of a <b>transmission facility</b> whose only transmission facility(ies) on the <b>bulk electric system</b> is a radial line(s) connecting a <b>generating unit</b> to the <b>interconnected electric system</b>.</li> </ul>	<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>Nexen appreciates the AESO's efforts in providing further clarity on the elements of the AIES and functional entities which really impact system reliability and excluding those that do not.</p> <p>Nexen is still concerned that the different functional entity definitions (in particular TFO and DC) still require a greater clarity. As Nexen has noted in other reliability standard comments, it is clear there are a number of circumstances and situations which now require frequent updates to the functional entity definitions. For instance we started with Transmission Facility</p>	

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			<p>Owner (TFO) to Owner of a Transmission Facility to now an Operator of a Transmission Facility.</p> <p>Nexen would also submit that the “owner” or “operator of a transmission facility” as defined also do not account for ISD’s which generally have radial interconnections that primarily serve on-site load.</p> <p>Again while Nexen appreciates the AESO’s efforts to take into account stakeholder concerns and develop a robust compliance program, the continual change in the functional entities would seem to suggest the AESO along with industry must work together to conduct a full review of the functional entity and registration processes prior to proceeding with the introduction of any additional standards.</p>	

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<p><b>Effective Date</b> April 1, 2005</p>	<p><b>Effective Date</b> Three hundred and sixty five days (365) after the date the <b>Commission</b> 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><b>R1.</b> Each Transmission Operator, Balancing Authority, and Reliability Coordinator shall staff all operating positions that meet both of the following criteria with personnel that are NERC-certified for the applicable functions:</p> <p><b>R1.1.</b> Positions that have the primary responsibility, either directly or through communications with others, for the real-time operation of the interconnected Bulk Electric System.</p> <p><b>R1.2.</b> Positions directly responsible for complying with NERC standards.</p>	<p><b>R1</b> Except as contemplated in requirement R2, R3 and R4, each of the <b>ISO</b> and the <b>operator</b> of a <b>transmission facility</b> must staff real-time operating positions associated with the <b>bulk electric system</b> with persons who hold valid <b>NERC</b> certification as follows:</p> <ul style="list-style-type: none"> <li>in the case of the <b>ISO</b>, certification as either <b>NERC</b> Reliability Operator or <b>NERC</b> Balancing, Interchange and Transmission Operator.</li> <li>In the case of an <b>operator</b> of a <b>transmission facility</b>, certification as any of <b>NERC</b> Reliability Operator, <b>NERC</b> Balancing, Interchange and Transmission Operator or <b>NERC</b> Transmission Operator.</li> </ul> <p><b>R2</b> Each of the <b>ISO</b> and the <b>operator</b> of a <b>transmission facility</b> must</p>	<p><input type="checkbox"/> New <input checked="" type="checkbox"/> Amended <input type="checkbox"/> Deleted</p> <p>Amended for clarity and consistency.</p> <p>Specified certification requirements applicable to the AESO and operators of transmission facilities.</p> <p>The applicability section includes the NERC requirement R1.1 criteria.</p> <p>Moved exceptions from the items identified in measures M1.1 and M1.2 in the NERC reliability standard to this standard under requirements R2 and R3 to address acceptable situations where NERC certification of real-time operations staff is not required</p>	<p><input type="checkbox"/> Support <input type="checkbox"/> Support with language suggestions <input checked="" type="checkbox"/> Oppose</p> <p>Similar to the comments provided in the Applicability section above, it is imperative that the functional entity definitions are correct so requirements are allocated to the appropriate party. For instance, R3 and the need for a back-up control center - generally traditional TFO's have these types of facilities – not generators and ISD's. If the functional entities are not clear, industry participants such as generators and ISD's which are not expected to meet this requirement may now be at risk of being non-compliant.</p>	

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	<p>ensure that all of its real-time operating trainees that do not hold valid <b>NERC</b> certification, as required in requirement R1, do not independently fill an operating position requiring valid <b>NERC</b> certification and are under the direct, continuous supervision and observation of a person who holds a valid <b>NERC</b> certification as identified in requirement R1.</p> <p><b>R3</b> During <b>system emergency</b> conditions when system control is transferred to a backup control center, each of the <b>ISO</b> and the <b>operator</b> of a <b>transmission facility</b> must ensure real-time operating positions associated with the <b>bulk electric system</b> are staffed with persons who hold valid <b>NERC</b> certification, as required in requirement R1, no later than four (4) hours after the transfer begins.</p>			
	<p><b>R4</b> The <b>operator</b> of a <b>transmission facility</b> whose real-time operating personnel do not hold NERC certification, as required in requirement R1, must only operate any portion of the <b>bulk electric system</b> after receiving approval for</p>	<p><input checked="" type="checkbox"/> New  <input type="checkbox"/> Amended  <input type="checkbox"/> Deleted</p> <p><b>Alberta Variance:</b> Added an exception to this standard under</p>	<p><input type="checkbox"/> Support  <input type="checkbox"/> Support with language suggestions  <input checked="" type="checkbox"/> Oppose</p> <p>Can the AESO provide clarity under requirement <b>R4</b> where it</p>	

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	such operation or direction from a person who holds valid NERC certification as specified in requirement R1.	requirement R4 to address acceptable situations where NERC certification of real-time operation staff is not required after that staff has received approval from a person who holds valid NERC certification.	states “must only operate any portion of the BES...” what portion is the operator allowed to operate?	
<p><b>M1.</b> Each Transmission Operator, Balancing Authority, and Reliability Coordinator shall have NERC-certified operating personnel on shift in required positions at all times with the following exceptions:</p> <p><b>M1.1</b> While in training, an individual without the proper NERC certification credential may not independently fill a required operating position. Trainees may perform critical tasks only under the direct, continuous supervision and observation of the NERC-certified individual filling the required position.</p> <p><b>M1.2</b> During a real-time operating emergency, the time when control is transferred from a primary control center to a backup control center shall not be included in the calculation of non-compliance. This time shall be limited to no more than four hours.</p>	<p><b>MR1</b> Evidence exists that real-time operating positions associated with the <b>bulk electric system</b> are staffed with persons who hold valid <b>NERC</b> certification as specified in requirement R1.</p> <p><b>MR2</b> Evidence exists, such as shift schedules or operator logs, that real-time operating trainees do not independently fill an operating position and are supervised as identified in requirement R2.</p> <p><b>MR3</b> Where transfer to the backup control centre exceeded four (4) hours, evidence exists, such as disturbance reports, logs or voice recordings, that the <b>operator</b> responsible for all real-time operation holds a valid <b>NERC</b> certification as specified in requirement R1.</p> <p><b>MR4</b> Evidence exists, such as voice recordings, that the <b>operator</b> of a <b>transmission facility</b> whose real-</p>	<p><input type="checkbox"/> New  <input checked="" type="checkbox"/> Amended  <input type="checkbox"/> Deleted</p> <p>Amended to align with requirements R1, R2, R3 and R4.</p>	<p><input type="checkbox"/> Support  <input type="checkbox"/> Support with language suggestions  <input checked="" type="checkbox"/> Oppose</p> <p>Similar to the comments provided in R4 above, can the AESO clarify what sort of evidence would be acceptable in demonstrating an operator only operated a portion of the BES?</p>	

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	time operating personnel do not hold NERC certification, only operated a portion of the <b>bulk electric system</b> as specified in requirement R4.			
<p><b>Compliance</b> To view the compliance section D of the NERC reliability standard follow this link: <a href="http://www.nerc.com/files/PER-003-0.pdf">http://www.nerc.com/files/PER-003-0.pdf</a></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: <a href="http://www.aeso.ca/loadsettlement/17189.html">http://www.aeso.ca/loadsettlement/17189.html</a>.</p>		
<p><b>Regional Differences</b> None identified.</p>	None identified.	Not applicable in Alberta		

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