



**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]: 2010/08/05  
Period of Consultation [yyyy/mm/dd]: 2010/08/05 through 2010/09/02  
Comments From: ENMAX Power Corporation  
Date [yyyy/mm/dd]: 2010/09/01

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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 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 checked="" type="checkbox"/> Support with language suggestions <input type="checkbox"/> Oppose</p> <p><i>Exemptions from this standard should be given in emergency situations.</i></p>	
<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 checked="" type="checkbox"/> Support with language suggestions <input type="checkbox"/> Oppose</p>	

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			<p><i>EPC expects that it will take three years to fully NERC certify all our Operators, if NERC certification is required.</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 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</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 checked="" type="checkbox"/> Support with language suggestions  <input type="checkbox"/> Oppose</p> <p><i>EPC will only support R1, R2 and R3 under the understanding that the proposed language suggestions for R4 are adopted.</i></p>	

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	<p>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 such operation or direction from a person who holds valid NERC certification as specified in requirement R1.</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 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</p>	<p><input type="checkbox"/> Support  <input checked="" type="checkbox"/> Support with language suggestions  <input type="checkbox"/> Oppose</p> <p><i>As per the T&amp;Cs sections 3d and 3f, the TFO is obligated to act reasonably in order to address an emergency, restore load or restore transmission elements.</i></p> <p><i>EPC therefore suggests the</i></p>	

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		who holds valid NERC certification.	<i>following wording be added: "In emergency situations, a non- NERC certified operator may operate the BES without prior approval from a NERC certified operator. Emergency situations include threats to life, public safety, the environment and equipment. The TFO will notify the ISO as soon as reasonably practical."</i>	
<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</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</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 checked="" type="checkbox"/> Support with language suggestions <input type="checkbox"/> Oppose</p> <p><i>EPC will only support MR1, MR2 and MR3 under the understanding that the proposed language suggestions for R4 are adopted.</i></p>	

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shall not be included in the calculation of non-compliance. This time shall be limited to no more than four hours.	specified in requirement R1.  <b>MR4</b> Evidence exists, such as voice recordings, that the <b>operator</b> of a <b>transmission facility</b> whose real-time operating personnel do not hold NERC certification, only operated a portion of the <b>bulk electric system</b> as specified in requirement R4.			
<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>		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> .		
<b>Regional Differences</b> None identified.	None identified.	Not applicable in Alberta		

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

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