

Stakeholder Comparison Comment Rationale Matrix

2011-09-13

AESO AUTHORITATIVE DOCUMENT PROCESS

Alberta Reliability Standard – EOP-001-AB-2 Emergency Operations Planning

Date of Request for Comment [yyyy/mm/dd]: 2011-09-08

Period of Consultation [yyyy/mm/dd]: 2011-09-08 through 2011-10-07

Comments From: [Suncor Energy Inc.]

Date [yyyy/mm/dd]: 2011-10-04

Contact: [Subrota Bairagi]

Phone: (780) 743-6554

E-mail: sbairagi@Suncor.com

**COMPARISON BETWEEN NERC EOP-001-2 AND ALBERTA EOP-001-AB-2
EMERGENCY OPERATIONS PLANNING**

| NERC EOP-001-2 | EOP-001-AB-1 from previous consultation (based on NERC EOP-001-1) ¹ | EOP-001-AB-2 | Explanation of differences between EOP-001-AB-2 and NERC EOP-001-2 | Stakeholder Comments (Insert comments here) | AESO Replies |
|---|---|---|--|---|--------------|
| <p>Purpose Each Transmission Operator and Balancing Authority needs to develop, maintain, and implement a set of plans to mitigate operating emergencies. These plans need to be coordinated with other Transmission Operators and Balancing Authorities, and the Reliability Coordinator.</p> | <p>Purpose The purpose of this reliability standard is to define requirements for development, maintenance, implementation and coordination of plans to mitigate operating emergencies.</p> | <p>Purpose The purpose of this reliability standard is to define requirements for the development, maintenance, implementation and coordination of plans to mitigate operating emergencies.</p> | | | |
| <p>Applicability 4.1. Balancing Authorities. 4.2. Transmission Operators.</p> | <p>Applicability This reliability standard applies to:</p> <ul style="list-style-type: none"> • ISO • TFOs | <p>Applicability This reliability standard applies to:</p> <p>(a) the operator of a transmission facility that is part of the bulk electric system; and</p> <p>(b) the ISO.</p> <p>This reliability standard does not apply to the operator of a transmission facility whose transmission facility is a radial connection from a generating unit or an aggregated</p> | <p>The terms used to describe applicable entities in this reliability standard have been amended from the NERC version in order to correctly identify the applicable entities in Alberta and to align with terms included in the AESO Consolidated Authoritative Documents Glossary.</p> | <p><i>Suncor requests AESO to provide examples of “transmission facility [that] is a radial connection from a generating unit or an aggregated generating facility to either the transmission system...?”</i></p> | |

¹ This column presents the version that was previously consulted on. It is for information only.
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| | | generating facility to either the transmission system or to transmission facilities within the city of Medicine Hat. | | | |
| Effective Date Twenty-four months after the first day of the first calendar quarter following applicable regulatory approval. In those jurisdictions where no regulatory approval is required, all requirements go into effect twenty-four months after Board of Trustees adoption. | Effective Date Ten calendar days after the date of approval by the Commission. | Effective Date October 1, 2012 | | <i>No Comment</i> | |
| R1. Balancing Authorities shall have operating agreements with adjacent Balancing Authorities that shall, at a minimum, contain provisions for emergency assistance, including provisions to obtain emergency assistance from remote Balancing Authorities. | R1 The ISO must have operating agreements with adjacent balancing authorities that contain provisions for emergency energy, including provisions to obtain emergency energy from remote balancing authorities. | R1 The ISO must, as appropriate, have operating agreements with adjacent balancing authorities that contain provisions for emergency assistance . | <input type="checkbox"/> New <input checked="" type="checkbox"/> Amended <input type="checkbox"/> Deleted Alberta Variance²: Removed “including provisions to obtain emergency assistance from remote Balancing Authorities” as stated in | <i>No Comment (Not Applicable)</i> | |

² An Alberta variance is a change from the US Reliability Standard that the AESO has determined is material.
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| | | | NERC EOP-001-2 requirement R1. The AESO does not have the ability to obtain transmission rights from other transmission providers in order to obtain emergency assistance from remote balancing authorities. | | |
| <p>R2. Each Transmission Operator and Balancing Authority shall:</p> <p>R2.1. Develop, maintain, and implement a set of plans to mitigate operating emergencies for insufficient generating capacity.</p> | <p>R2 The ISO must develop, maintain, and implement a set of plans to mitigate insufficient generating capacity.</p> | <p>R2 The ISO must develop, maintain and implement a capacity and energy emergency plan to mitigate insufficient generating capacity.</p> | <p><input type="checkbox"/> New <input checked="" type="checkbox"/> Amended <input type="checkbox"/> Deleted</p> <p>Identified the Alberta reliability entity applicable to this requirement. Specified the type of plan as a “capacity and energy emergency plan” to align with the reference to this type of plan in EOP-002-AB-2.</p> | <p><i>No Comment (Not Applicable)</i></p> | |
| <p>R2.2. Develop, maintain, and implement a set of plans to mitigate operating emergencies on the transmission system.</p> | <p>R3 The ISO must develop and maintain a set of plans to meet ISO transmission reliability operating criteria and mitigate operating emergencies on the transmission system.</p> | <p>R3 Each of the ISO and the operator of a transmission facility must develop, maintain and implement plans to mitigate operating emergencies on the transmission system.</p> | <p><input type="checkbox"/> New <input checked="" type="checkbox"/> Amended <input type="checkbox"/> Deleted</p> <p>Identified Alberta reliability</p> | <p><i>No Comment</i></p> | |

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|---|--|--|--|---|--------------|
| | R4 The ISO must implement a set of plans to meet ISO transmission reliability operating criteria and to mitigate operating emergencies on the transmission system | | entities applicable to this requirement. | | |
| R2.3. Develop, maintain, and implement a set of plans for load shedding. | R5 The ISO and TFOs must each develop, maintain, and implement a set of plans for load shedding | R4 Each of the ISO and the operator of a transmission facility must develop, maintain and implement plans for load shedding. | <input type="checkbox"/> New <input checked="" type="checkbox"/> Amended <input type="checkbox"/> Deleted Identified Alberta reliability entities applicable to this requirement. | <i>No Comment</i> | |
| R2.4. Develop, maintain, and implement a set of plans for system restoration. | R6 The ISO and TFOs must each develop, maintain, and implement a set of plans for system restoration. | | <input type="checkbox"/> New <input type="checkbox"/> Amended <input checked="" type="checkbox"/> Deleted This requirement was in the previous NERC version of this reliability standard, however, NERC has deleted it from NERC EOP-001-2. | | |

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| <p>R3. Each Transmission Operator and Balancing Authority shall have emergency plans that will enable it to mitigate operating emergencies. At a minimum, Transmission Operator and Balancing Authority emergency plans shall include:</p> <p>R3.1. Communications protocols to be used during emergencies</p> <p>R3.2. A list of controlling actions to resolve the emergency. Load reduction, in sufficient quantity to resolve the emergency within NERC-established timelines, shall be one of the controlling actions.</p> <p>R3.3. The tasks to be coordinated with and among adjacent Transmission Operators and Balancing Authorities.</p> | <p>R7 The ISO and TFOs must each include the following in each plan it must develop, maintain and implement as required by this reliability standard.</p> <p>R7.1 Communication protocols to be used during emergencies.</p> <p>R7.2 A list of controlling actions to resolve the operating emergency, including a controlling action to reduce load if required, within NERC established timelines.</p> <p>R7.3 The tasks to be coordinated, as applicable, with and among adjacent TFOs, interconnected transmission operators and adjacent balancing authorities.</p> | <p>R5 Each of the ISO and the operator of a transmission facility must include, at a minimum, when developing emergency plans as identified in requirements R2, R3 and R4, the following:</p> <p>(a) communication protocols to be used during operating emergencies;</p> <p>(b) a list of controlling actions to resolve the operating emergency within NERC established timelines, including, where appropriate, a controlling action to reduce load;</p> <p>(c) the tasks to be coordinated with and among any affected operator of a transmission facility, adjacent interconnected transmission operator and adjacent balancing authority, as appropriate; and</p> | <p><input type="checkbox"/> New <input checked="" type="checkbox"/> Amended <input type="checkbox"/> Deleted</p> <p>Amended for clarity and consistency.</p> <p>Amended to include that shedding of load is not an appropriate action for all emergencies.</p> | <p><i>R3.2: Transmission do not normally direct load shedding, this is a generation/operation function unless the reference is made to circuit breaker settings.</i></p> <p><i>R3.4: Who have the jurisdiction to determine the appropriate staffing level during emergency (Operator or AESO)? In addition, who have the authority to determine the timeframe for additional resources / personnel allocation during</i></p> | |

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| <p>R3.4. Staffing levels for the emergency.</p> | <p>R7.4 A procedure for adjusting staffing levels needed for the operating emergency.</p> | <p>(d) a procedure for adjusting staffing levels for the emergency, where appropriate.</p> | <p>NERC EOP-001-2 requirement R3.4 states emergency plans shall include “staffing levels for the emergency”, however specific staffing levels are difficult to specify since they may vary depending on the operating emergency. Clarified that a procedure for adjusting staffing levels is required.</p> | <p><i>emergency? To reflect the operating reality of very remote areas, will concession or exception be granted?</i></p> | |
| <p>R4. Each Transmission Operator and Balancing Authority shall include the applicable elements in Attachment 1-EOP-001-0 when developing an emergency plan.</p> | <p>R8 The ISO and TFOs must each consider the elements in Attachment 1 when developing emergency plans.</p> | <p>R6 The ISO must consider the elements in Appendix 1 when developing a capacity and energy emergency plan in accordance with requirement R2.</p> | <p><input type="checkbox"/> New <input checked="" type="checkbox"/> Amended <input type="checkbox"/> Deleted</p> <p>Alberta Variance³: NERC EOP-001-2 requirement R4 states applicable elements in Attachment 1-EOP-001-0 are to be included in emergency plans. However, the items in Appendix 1 only apply to a capacity and energy emergency as stated in Alberta requirement R5.</p> | <p><i>No Comment (Not Applicable)</i></p> | |

³ An Alberta variance is a change from the US Reliability Standard that the AESO has determined is material.
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|---|--|--|--|---|--------------|
| <p>R5. The Transmission Operator and Balancing Authority shall annually review and update each emergency plan. The Transmission Operator and Balancing Authority shall provide a copy of its updated emergency plans to its Reliability Coordinator and to neighboring Transmission Operators and Balancing Authorities.</p> | <p>R9 The ISO and TFOs must each review and update, as required, each emergency plan within 12 months of the last review.</p> | <p>R7 The ISO must review its capacity and energy emergency plan, plans to mitigate operating emergencies on the transmission system and plans for load shedding once every calendar year and update as required.</p> | <p><input type="checkbox"/> New <input checked="" type="checkbox"/> Amended <input type="checkbox"/> Deleted</p> <p>Separated NERC requirement R5 into four requirements (R7-R10) to distinguish responsibilities for updating and distributing emergency plans and to separately identify the responsibilities of the ISO and an operator of a transmission facility.</p> <p>Amended review period to align with other Alberta reliability standards.</p> | <p><i>No Comment (Not Applicable)</i></p> | |
| | | <p>R8 Each operator of a transmission facility must review its plans for load shedding once every calendar year and update as required.</p> | <p><input type="checkbox"/> New <input checked="" type="checkbox"/> Amended <input type="checkbox"/> Deleted</p> <p>Separated NERC requirement R5 into four requirements (R7-R10) to distinguish responsibilities for updating and distributing</p> | <p><i>No Comment</i></p> | |

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| | | | <p>emergency plans and to separately identify the responsibilities of the ISO and an operator of a transmission facility.</p> <p>Amended review period to align with other Alberta reliability standards.</p> | | |
| | <p>R10 The ISO and TFOs must each provide a copy of its updated emergency plans, as applicable, to adjacent TFOs, the VRC and to its interconnected transmission operators and adjacent balancing authorities.</p> | <p>R9 The ISO must provide a copy of its updated capacity and energy emergency plan, plans for load shedding and plans to mitigate operating emergencies on the transmission system to any affected:</p> <p>(a) operator of a transmission facility;</p> <p>(b) adjacent interconnected transmission operator; and</p> <p>(c) adjacent balancing authority, and to the WECC Reliability Coordinator.</p> | <p><input type="checkbox"/> New <input checked="" type="checkbox"/> Amended <input type="checkbox"/> Deleted</p> <p>Separated NERC requirement R5 into four requirements (R7-R10) to distinguish responsibilities for updating and distributing emergency plans and to separately identify the responsibilities of the ISO and an operator of a transmission facility.</p> <p>Amended review period to align with other Alberta reliability standards.</p> | <p><i>No Comment</i></p> | |

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| | | <p>R10 Each operator of a transmission facility must provide a copy of its updated plans to mitigate operating emergencies on the transmission system and plans for load shedding to any affected adjacent operator of a transmission facility and the ISO.</p> | <p><input type="checkbox"/> New <input checked="" type="checkbox"/> Amended <input type="checkbox"/> Deleted</p> <p>Separated NERC requirement R5 into four requirements (R7-R10) to distinguish responsibilities for updating and distributing emergency plans and to separately identify the responsibilities of the ISO and an operator of a transmission facility.</p> <p>Amended review period to align with other Alberta reliability standards.</p> | <p><i>No Comment</i></p> | |
| <p>R6. The Transmission Operator and Balancing Authority shall coordinate its emergency plans with other Transmission Operators and Balancing Authorities as appropriate. This coordination includes the following steps, as applicable:</p> | | | <p><input type="checkbox"/> New <input type="checkbox"/> Amended <input checked="" type="checkbox"/> Deleted</p> <p>Deleted NERC EOP-001-2 requirement R6 from the Alberta reliability standard. This requirement is redundant with the adoption</p> | | |

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|--|---|--------------|--|---|--------------|
| <p>R6.1. The Transmission Operator and Balancing Authority shall establish and maintain reliable communications between interconnected systems.</p> <p>R6.2. The Transmission Operator and Balancing Authority shall arrange new interchange agreements to provide for emergency capacity or energy transfers if existing agreements cannot be used.</p> | <p>R11 The ISO and TFOs must each establish, maintain and test to ensure reliable communications, as applicable, between adjacent TFOs, interconnected transmission operators and adjacent balancing authorities when coordinating emergency plans.</p> | | <p>of Alberta requirement R4.3.</p> <p><input type="checkbox"/> New <input type="checkbox"/> Amended <input checked="" type="checkbox"/> Deleted</p> <p>NERC EOP-001-2 requirement R6.1 will be covered in R1 and R2 of Alberta Reliability Standard COM-001-AB-1.1 that is currently under development.</p> <p>Alberta Variance⁴: NERC EOP-001-2 requirement R6.2 is deleted as the ISO enters into operating agreements with adjacent balancing authorities that contain provisions for emergency assistance in accordance with Alberta EOP-001-AB-1 requirement R1. Further, the NERC requirement for arranging new interchange agreements to provide for emergency</p> | | |

⁴ An Alberta variance is a change from the US Reliability Standard that the AESO has determined is material.
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| <p>R6.3. The Transmission Operator and Balancing Authority shall coordinate transmission and generator maintenance schedules to maximize capacity or conserve the fuel in short supply. (This includes water for hydro generators.)</p> <p>R6.4. The Transmission Operator and Balancing Authority shall arrange deliveries of electrical energy or fuel from remote systems through normal operating channels.</p> | | | <p>capacity or energy transfers was not adopted as the ISO uses market mechanism to obtain energy from market participants during emergencies.</p> <p>Alberta Variance⁵: NERC EOP-001-2 requirement R6.3 to coordinate transmission and generator maintenance schedules to maximize capacity or conserve the fuel in short supply is not applicable in Alberta as it goes against the market structure in Alberta</p> <p>Alberta Variance⁶: NERC EOP-001-2 requirement R6.4 to arrange deliveries of electrical energy or fuel from remote systems through normal operating channels is not applicable in Alberta as it goes against the market structure in Alberta.</p> | | |

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| <p>M1. The Transmission Operator and Balancing Authority shall have its emergency plans available for review by the Regional Reliability Organization at all times.</p> | | | | | |
| <p>M2. The Transmission Operator and Balancing Authority shall have its two most recent annual self assessments available for review by the Regional Reliability Organization at all times.</p> | | | | | |
| | <p>MR1 Provisions for emergency energy exist between the ISO and at least one adjacent balancing authority. A reserve sharing agreement or an agreement for emergency energy exists with a remote balancing authority.</p> | <p>MR1 Evidence of having at least one (1) operating agreement with an adjacent balancing authority as required in requirement R1 exists.</p> | | <p>No Comment (Not Applicable)</p> | |
| | <p>MR2 Plans exist for mitigating insufficient generating capacity.</p> | <p>MR2 Evidence of developing, maintaining and implementing a capacity and energy emergency plan as required in requirement</p> | | <p><i>No Comment (Not Applicable)</i></p> | |

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| | | R2 exists. Evidence may include a dated, current capacity and energy emergency plan and communications or training to the operating personnel. | | | |
| | <p>MR3 Plans exist to meet ISO transmission reliability criteria and mitigate operating emergencies on the transmission system.</p> <p>MR4 Plans were followed, ISO reliability criteria were met and operating emergencies were mitigated when system conditions required the plans to be followed.</p> | <p>MR3 Evidence of developing, maintaining and implementing plans to mitigate operating emergencies on the transmission system as required in requirement R3 exists. Evidence may include dated, current plans to mitigate operating emergencies on the transmission system and communications or training to the operating personnel.</p> | | <i>No Comment</i> | |
| | <p>MR5 Plans exist for implementing a set of plans for load shedding.</p> | <p>MR4 Evidence of developing, maintaining and implementing load shedding plans as required in requirement R4 exists. Evidence may include dated, current plans for load shedding and communications or training to the operating personnel.</p> | | | |
| | <p>MR6 Plans exist for implementing a set of plans for system restoration.</p> | | | | |

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| | <p>MR7.1 Communication protocols exist as per requirement R7.1</p> <p>MR7.2 Controlling actions to resolve emergencies exist as per requirement R7.2.</p> <p>MR7.3 Coordinated tasks to resolve emergencies exist as per requirement R7.3.</p> <p>MR7.4 Callout procedures exist to obtain additional staff during an emergency.</p> | <p>MR5 Evidence of including the items in emergency plans as required in requirement R5 exists. Evidence may include emergency plans that contain items listed in requirement R5.</p> | | <p><i>No Comment</i></p> | |
| | <p>MR8 Documentation exists and shows the elements from Attachment 1 were considered.</p> | <p>MR6 Evidence of considering the elements in Appendix 1 as required in requirement R6 exists. Evidence may include documentation indicating which elements from Appendix 1 were not included in the capacity and emergency plan and the rationale why they were not included.</p> | | <p><i>No Comment (Not Applicable)</i></p> | |
| | <p>MR9 Evidence exists that each emergency plan was reviewed and updated, as per requirement R9.</p> | <p>MR7 Evidence of reviewing and updating each plan as required in requirement R7 exists. Evidence may include documentation confirming each plan was reviewed once every calendar</p> | | <p><i>No Comment (Not Applicable)</i></p> | |

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| | | year and updated as required. | | | |
| | | MR8 Evidence of reviewing and updating plans as required in requirement R8 exists. Evidence may include documentation confirming each plan was reviewed once every calendar year and updated as required. | | <i>No Comment</i> | |
| | MR10 Confirmation exists that the ISO and TFOs sent updated emergency plans as per requirement R10 | MR9 Evidence of providing each updated plan as required in requirement R9 exists. Evidence may include email or mail to appropriate recipients that identifies contents submitted. | | <i>No Comment (Not Applicable)</i> | |
| | | MR10 Evidence of providing updated plans as required in requirement R10 exists. Evidence may include email or mail to appropriate recipients that identifies contents submitted. | | <i>No Comment</i> | |
| | MR11 Evidence exists that tests have been conducted as per requirement R11, | | | | |
| Compliance To view the compliance | | | The Alberta reliability standards do not contain a | | |

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| section D of the NERC reliability standard follow this link: http://www.nerc.com/files/BAL-002-0.pdf | | | 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 | | |

Appendix 1⁷

Elements for Consideration in Development of Capacity and Energy Emergency Plan

1. **Bulk electric system** energy use — The reduction of the **bulk electric system's** own energy use to a minimum.
2. Public appeals — Appeals to the public through all media for voluntary load reductions and energy conservation including educational messages on how to accomplish such load reduction and conservation.
3. Load management — Implementation of load management and voltage reductions, if appropriate.
4. Interruptible and curtailable loads — Use of interruptible and curtailable load to reduce capacity requirements or to conserve the fuel in short supply.
5. Maximizing **generating unit** output and availability — The operation of all generating sources to maximize output and availability. This should include plans to winterize **generating units** and **aggregated generating facilities** during extreme cold weather.
6. Notifying independent power producers (IPP) — Notification of cogeneration and independent power producers to maximize output and availability.
7. Requests of government — Requests to appropriate government agencies to implement programs to achieve necessary energy reductions.
8. Load curtailment — A mandatory load curtailment plan to use as a last resort. This plan should address the needs of critical loads essential to the health, safety and welfare of the community. Address firm load curtailment.
9. Notification of government agencies — Notification of appropriate government agencies as the various steps of the operating emergency plan are implemented.
10. Notifications to operating entities — Notifications to other operating entities as steps in the operating emergency plan are implemented.

⁷ Alberta Variance – Deleted some elements in Appendix 1 that are to be considered when developing an emergency plan as these elements (fuel supply and inventory, fuel switching, optimize fuel supply and appeals to customers to use alternate fuels) are managed through the market structure in Alberta. An Alberta variance is a change from the US Reliability Standard that the AESO has determined is material.

| Definitions | Stakeholder Comments (Insert comments here) | AESO Replies |
|-----------------------|--|--------------|
| None | | |
| (a) Removals | | |
| (b) Amendments | | |