

Stakeholder Comment Form

Alberta Reliability Standards Process

Proposed New Alberta Reliability Standards

Date of Request for Comment: September 9, 2009
Period of Consultation: September 9 through October 9, 2009

Comments From: _TransAlta_____

Date: __October 8, 2009_____

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Reliability Standard Number	Description	Stakeholder Comments
EOP-001-AB-1	Emergency Operations Planning	
CIP-001-AB-1	Sabotage Reporting	TransAlta is concerned about the Alberta Electric System Operator's (AESO) stated intention to file for approval with the Alberta Utilities Commission (AUC) both Operating Policy and Procedure (OPP) 808 and Reliability Standard CIP-001-AB-01. Each of OPP 808 and CIP-001-AB-01 identify the obligations of the ISO and market participants relative to sabotage event reporting. This approach is inconsistent with the aims of the Transition of Authoritative Documents (TOAD) initiative as there is no material difference in content or subject matter of these two authoritative documents and consequently duplicative requirements and obligations are created. In order to achieve this goal, it is necessary to eliminate any overlaps, duplication and gaps with respect to content in authoritative documents. The TOAD working group members (which included a number of AESO employees) agreed that where there is overlapping subject matter in multiple authoritative documents, the subject matter should be consolidated into one authoritative document. Consolidation of authoritative documents by subject matter enables market participants to better comply and is an important step towards achieving a healthy culture of compliance.

		<p>Our most significant concern is that the AESO's intended practice of developing duplicative rules and standards leads to the possibility of the assessment of multiple penalties on persons or entities for the same non-compliance.</p> <p>TransAlta does not support the filing of both OPP 808 and Reliability Standard CIP-001-AB-01 with the AUC. We are of the view that the existence or creation of two authoritative documents with overlapping requirements is not in the public interest, can create conflicting compliance requirements. We recommend that the AESO consolidate the content of the two authoritative documents into CIP-001-AB-01 and remove OPP 808 from the ISO rules.</p>
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Please return this form with your comments by October 9, 2009, to:

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