

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 Corporation
Date: October 9, 2009
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Reliability Standard Number	Description	Stakeholder Comments
EOP-001-AB-1	Emergency Operations Planning	
CIP-001-AB-1	Sabotage Reporting	<p>Applicability: This standard more appropriately applies to Generator Operators as opposed to Generator Facility Owners, as the operators will be responsible for sabotage response in a real time situation.</p> <p>R1 states that each responsible entity must document and implement procedures for receiving information about multi-site sabotage events affecting interconnection. TransAlta would like more specifics included in the standard around this point. Receiving what information, and from whom? What is defined as a multi-site sabotage event vs. a single site? Would this not be information we would receive directly from the ISO?</p> <p>R2 states that each responsible entity must document and implement procedures for communicating information concerning sabotage events in accordance with ISO rules for sabotage reporting. Firstly, any reference to ISO rules should specifically include the rule in the standard so there is absolute certainty as to which rules are referenced. Secondly, and probably more broadly, TransAlta believes that all rules regarding</p>

		<p>sabotage reporting should be consolidated in one place, most likely in this standard. It does not make sense to have two separate rules regarding the same thing (eg: CIP-001 and OPP 808). Two set of rules will cause confusion and potential for error in a real time sabotage situation. Additionally, two sets of rules mean that there is the potential for two separate fines for the exact same violation. TransAlta would like all rules regarding sabotage reporting to be incorporated into CIP-001.</p> <p>R3 sates that each responsible entity must annually provide its operating personnel with sabotage event response procedures, including personnel to contact, for reporting sabotage events. TransAlta would suggest striking the word annually, this information should remain current and be updated as required, which may be more often than on an annual basis.</p> <p>M4 states that evidence exists that indicate procedures specified in requirement R4 were implemented upon occurrence of a sabotage event, however R4 is not a standard that requires a response to a sabotage event, but rather is a requirement to establish communication contacts <u>prior to</u> a sabotage event.</p>
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Please return this form with your comments by October 9, 2009, to:

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