

August 26, 2020

To: Market Surveillance Administrator, Market Participants and Other Interested Parties
("Stakeholders")

Re: Stakeholder Comments on the Request for Additional Feedback from the Consultation Session on the Development of the Following Proposed New and Amended ISO Rules and Reliability Standards:

- 1) Proposed amendments to Section 502.4 of the ISO rules, *Automated Dispatch and Messaging System and Voice Communication System Requirements* ("Section 502.4");
- 2) Proposed new Section 502.17 of the ISO rules, *Voice Communication System Requirements* ("Section 502.17");
- 3) Proposed new Alberta Reliability Standard COM-001-3, *Communications* ("COM-001-AB-3"); and
- 4) Proposed new Alberta Reliability Standard COM-002-AB-4, *Operating Personnel Communication Protocols* ("COM-002-AB-4"),

collectively referred to as the ("communication ISO rules and reliability standards").

The Alberta Electric System Operator ("AESO") received comments from Stakeholders in response to the July 28, 2020, Letter of Notice for additional feedback on draft Proposed New and Amended Communication ISO Rules and Reliability Standards. These comments have now been posted on the AESO website.

The following table is hyperlinked to help in directing Stakeholders to these written comments.

Comments on Proposed New and Amended Communication ISO Rules and Reliability Standards
ATCO Electric Ltd.
Capital Power Corporation
ENMAX Corporation
ENMAX Power Corporation
TransAlta Corporation

The AESO would like to use this opportunity to thank all Stakeholders who participated in this part of the ISO rules and reliability standards comment process. All written comments received will be taken into consideration during the AESO's development of the proposed new and amended communication ISO rules and reliability standards.

Sincerely,

"Melissa Mitchell-Moisson"

Melissa Mitchell-Moisson
Email: rules_comments@aeso.ca

Stakeholder Comment Matrix – July 28, 2020
Development of a Proposed New and Amended Communication ISO Rules and Reliability Standards
July 2020 Stakeholder Session



Period of Comment: July 28, 2020 through August 19, 2020	Contact: Dan Bamber
Comments From: ATCO Electric Ltd.	Phone: 780-918-0986
Date: [2020/08/19]	Email: Dan.bamber@atco.com

Instructions:

1. Please fill out the section above as indicated.
2. Please refer back to the Letter of Notice under the “Attachments” section to view materials related to the proposed new and amended communication ISO rules and reliability standards.
3. Email your completed comment matrix to rules_comments@aeso.ca by **August 19, 2020**.

The AESO is seeking comments from Stakeholders with regard to the following matters:



	Question	Stakeholder Comments
1.	Please comment on the communication ISO rules and reliability standards stakeholder session hosted on July 20, 2020. Was the session valuable?	Yes it was and AE appreciates AESO's effort in this regard.
2.	Do you have any comments related to the draft proposed new COM-001-AB-3, <i>Communications</i> , that were not discussed at the July 2020 Stakeholder Session? If so, please comment.	No
3.	Do you have any comments related to the draft proposed amended Section 502.4, <i>Automated Dispatch and Messaging System</i> , that were not discussed at the July 2020 Stakeholder Session? If so, please comment.	No
4.	Do you have any comments related to the draft proposed amended Section 502.17, <i>Voice Communication System Requirements</i> , that were not discussed at the July 2020 Stakeholder Session? If so, please comment.	<i>AE does not have any concern with the clean copy of 502.17, however wanted to ensure that compliance will be 2 years after AUC approval date vs the original 9 months identified for the system to be fully installed and commissioned.</i>
5.	Do you have any additional comments?	No

Thank you for your input. Please email your comments to: rules_comments@aeso.ca.

Stakeholder Comment Matrix – July 28, 2020
Development of a Proposed New and Amended Communication ISO Rules and Reliability Standards
July 2020 Stakeholder Session



Period of Comment: July 28, 2020 through August 19, 2020	Contact: Thomas Ng
Comments From: Capital Power	Phone: (780) 392-5362
Date: 2020/08/19	Email: tng@capitalpower.com

Instructions:

1. Please fill out the section above as indicated.
2. Please refer back to the Letter of Notice under the “Attachments” section to view materials related to the proposed new and amended communication ISO rules and reliability standards.
3. Email your completed comment matrix to rules_comments@aeso.ca by **August 19, 2020**.

The AESO is seeking comments from Stakeholders with regard to the following matters:



	Question	Stakeholder Comments
1.	Please comment on the communication ISO rules and reliability standards stakeholder session hosted on July 20, 2020. Was the session valuable?	<p>Capital Power appreciates the opportunity to participate in the stakeholder session regarding proposed new and amended communication standards and rules. The session was valuable and provided stakeholders with an opportunity to understand the rationale for the proposed changes to AESO rules.</p> <p>As noted in the session, the AESO intends to release details of a proposed system project relating to implementation of the requirements proposed in the new and amended ISO rules and reliability standards. As noted at the session and in the comments below, Capital Power has significant concerns with the proposed requirements in ISO Rule 502.17. Capital Power is, therefore, supportive of the AESO’s intention to further discuss alternative approaches for implementation, including a potential system project. Given the significant concerns that exist with the proposed requirements, Capital Power submits that stakeholders should have an opportunity to understand the scope and timing of the system project prior to the AESO filing an application with the Commission for any approvals relating to the amended ISO rules.</p>
2.	Do you have any comments related to the draft proposed new COM-001-AB-3, <i>Communications</i> , that were not discussed at the July 2020 Stakeholder Session? If so, please comment.	<p>In the NERC version of COM-001-3 the term “Interpersonal Communication” is defined as: “[a]ny medium that allows two or more individuals to interact, consult, or exchange information”. However, during the AESO consultation it was evident that the AESO, via ISO Rule 502.4, plans on limiting the definition of interpersonal communication in Alberta. Capital Power requests that the AESO include the AESO’s definition of Interpersonal Communication in the AESO’s Consolidated Authoritative Document Glossary so as to avoid confusion with the NERC definition of the term.</p>
3.	Do you have any comments related to the draft proposed amended Section 502.4, <i>Automated Dispatch and Messaging System</i> , that were not discussed at the July 2020 Stakeholder Session? If so, please comment.	<p>Capital Power seeks clarification on whether subsection 3 is applicable to carbon copy only ADaMS accounts. These accounts receive dispatch and directive instructions but may not acknowledge the dispatch and or directive instructions. To require pool participants carbon copy only ADaMS accounts to comply with this requirement may provide little to no value to the reliability of the Alberta Interconnected Electric System.</p>



<p>4.</p>	<p>Do you have any comments related to the draft proposed amended Section 502.17, <i>Voice Communication System Requirements</i>, that were not discussed at the July 2020 Stakeholder Session? If so, please comment.</p>	<p>As previously noted in Capital Power's stakeholder comment matrix submitted on September 5, 2019, Capital Power has significant concerns relating to the implementation cost of the utility orderwire architecture for generation units greater than 300 MW. These concerns relate to the expected capital expenditures, operational expenditures and commercial costs that market participants would be required to absorb as part of the implementation of ISO Rule 502.17. These costs are significant for market participants and will disproportionately increase costs for large generators operating in the energy market.</p> <p>While the costs are borne by large generators, the benefits of utility orderwire infrastructure accrue broadly to the Alberta Interconnected Electric System and not to individual generators. The AESO acknowledged this fact at the July 20 session, stating that the benefits of utility orderwire would primarily be realized during major system restoration events. It is, therefore, appropriate to consider a mechanism for cost recovery for large generators that recognizes the substantial system benefit that would come from investments by individual generators. Absent a mechanism for cost recovery, the requirements disproportionately impact a subset of generators and renders those assets less competitive in the energy market.</p> <p>During the stakeholder engagement on July 20, 2020, the AESO indicated that a proposed system project is being considered to implement the utility orderwire changes. Subject to details of the scope and timing, Capital Power submits that a system project, led by the AESO, is a more appropriate way to implement significant orderwire infrastructure upgrades in the province. Capital Power requests that the AESO considers the following in their system project scope:</p> <ul style="list-style-type: none"> • A mechanism for cost recovery should be included which would allow Market Participants an opportunity to recover prudently incurred cost of implementing, operating and maintaining utility orderwire. Capital Power believes this is an appropriate way to address the expenditure and cost issues outlined in our stakeholder comment matrix submission from September 5, 2019. • The AESO noted that further SCADA changes are being considered. SCADA changes may come with costs to an organization and any changes should be completed with stakeholder consultation. • The scope should also define roles and responsibility of GFOs and TFOs with respect to the system project. In addition, timelines should be included.
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	Question	Stakeholder Comments
5.	Do you have any additional comments?	<p>Provided that the utility orderwire system project proceeds, the AESO should consider defining availability requirements by entity. Capital Power is concerned with the availability requirements imposed on market participants given that parts of the utility orderwire infrastructure are owned, operated and maintained by the TFO. The AESO should consider the upstream effects if there are outages on the system that are out of the market participant’s control, as this places generating units at risk of being non-compliant.</p> <p>The proposed availability requirements for the utility orderwire is stringent and may pose challenges for market participants to comply. The AESO should consider that an availability percentage of 98% to apply on non-planned/unscheduled work and include provisions for market participants (GFOs or TFOs) to submit planned outages and maintenance activities to the utility orderwire system. Similar to ISO Rule Section 502.8, there should be provisions to allow market participants to create and communicate outage and maintenance plans with the AESO when such infrastructure outages are in effect.</p> <p>The AESO’s recommendation for market participants to submit a waiver and variance request by ISO Rule Section 103.14 to provide compliance relief, from when the rule is implemented to when the utility orderwire infrastructure has been implemented, is administrative in nature. Capital Power recommends that the AESO makes this process as smooth as possible and without time delays or to include a timeline to meet compliance requirements into the rule.</p>

Thank you for your input. Please email your comments to: rules_comments@aeso.ca.

Stakeholder Comment Matrix – July 28, 2020
Development of a Proposed New and Amended Communication ISO Rules and Reliability Standards
July 2020 Stakeholder Session



Period of Comment: July 28, 2020 through August 19, 2020 Comments From: ENMAX Corporation Date: 2020/08/19	Contact: Mark McGillivray Phone: 403-514-2782 Email: mmcglivray@enmax.com
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Instructions:

1. Please fill out the section above as indicated.
2. Please refer back to the Letter of Notice under the “Attachments” section to view materials related to the proposed new and amended communication ISO rules and reliability standards.
3. Email your completed comment matrix to rules_comments@aeso.ca by **August 19, 2020**.

The AESO is seeking comments from Stakeholders with regard to the following matters:

	Question	Stakeholder Comments
1.	Please comment on the communication ISO rules and reliability standards stakeholder session hosted on July 20, 2020. Was the session valuable?	<i>Yes, the session was of value.</i>
2.	Do you have any comments related to the draft proposed new COM-001-AB-3, <i>Communications</i> , that were not discussed at the July 2020 Stakeholder Session? If so, please comment.	<i>Interpersonal Communication capabilities requires more clarity from the AESO in the form of a definition to ensure voice communication is the intended use and not other forms such as text or instant messaging.</i>
3.	Do you have any comments related to the draft proposed amended Section 502.4, <i>Automated Dispatch and Messaging System</i> , that were not discussed at the July 2020 Stakeholder Session? If so, please comment.	<i>No comment at this time.</i>



	Question	Stakeholder Comments
4.	Do you have any comments related to the draft proposed amended Section 502.17, <i>Voice Communication System Requirements</i> , that were not discussed at the July 2020 Stakeholder Session? If so, please comment.	<p><i>As Orderwire is still required as backup for many facilities, the session did not appear to provide adequate information regarding the cost/benefit and cost recovery of using Orderwire vs. a satellite phone.</i></p> <p><i>While ENMAX does not disagree that Orderwire would create some efficiencies, the costs warranted are not justifiable for a system that is likely only to be used during extremely rare restoration events (i.e., once in a lifetime).</i></p> <p><i>Prior to making a final decision on which option to pursue, the AESO should first undertake a cost/benefit analysis to demonstrate the pros and cons of each option. Further details on implementation and required coordination with facility owners should also be considered in the analysis.</i></p> <p><i>If Orderwire is chosen, ENMAX supports that a system project be implemented to allow for cost recovery for all (TFO/GFO). Orderwire creates a system benefit and should be paid for by the system. ENMAX looks forward to the AESO providing more information on the scope of the project.</i></p>
5.	Do you have any additional comments?	<p><i>All costs related to implementing the new system must be considered and full recovery of all incremental costs should have a cost recovery mechanism in place that is acceptable and clear to owners before any expenditure is undertaken.</i></p>

Thank you for your input. Please email your comments to: rules_comments@aeso.ca.

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<p>Period of Comment: July 28, 2020 through August 19, 2020</p> <p>Comments From: ENMAX Power Corporation</p> <p>Date: 2020/08/17</p>	<p>Contact: Robert Rothstein</p> <p>Phone: 403-689-6507</p> <p>Email: rrothstein@enmax.com</p>
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	Question	Stakeholder Comments
1.	Please comment on the communication ISO rules and reliability standards stakeholder session hosted on July 20, 2020. Was the session valuable?	EPC found value in renewing discussions on the subject and sharing industry feedback.
2.	Do you have any comments related to the draft proposed new COM-001-AB-3, <i>Communications</i> , that were not discussed at the July 2020 Stakeholder Session? If so, please comment.	EPC has no comments on the COM-001-AB-3 draft.
3.	Do you have any comments related to the draft proposed amended Section 502.4, <i>Automated Dispatch and Messaging System</i> , that were not discussed at the July 2020 Stakeholder Session? If so, please comment.	EPC has no comments on the Section 502.4 proposals.
4.	Do you have any comments related to the draft proposed amended Section 502.17, <i>Voice Communication System Requirements</i> , that were not discussed at the July 2020 Stakeholder Session? If so, please comment.	EPC has no comments on the Section 502.17 proposals.

	Question	Stakeholder Comments
5.	Do you have any additional comments?	EPC is interested in industry discussions to finalize orderwire designs and schedules.

Thank you for your input. Please email your comments to: rules_comments@aeso.ca.



Period of Comment: July 28, 2020 through August 19, 2020 Comments From: TransAlta Date: [2020/08/19]	Contact: Morgan Tam Phone: 403 267 4642 Email: Morgan_Tam@TransAlta.com
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	Question	Stakeholder Comments
1.	Please comment on the communication ISO rules and reliability standards stakeholder session hosted on July 20, 2020. Was the session valuable?	<p>TransAlta appreciates the AESO provided the opportunity to clarify the current consultation, and access to subject matter experts.</p> <p>For future sessions, we respectfully request that the AESO makes proposed rules available to stakeholders at least 10 business days prior to the consultation; rather than only one day as in this case.</p> <p>TransAlta believes that the July 20, 2020 Zoom session could have been more valuable if such lead time is available for subject matter experts to review the documents and bring comments to the discussion.</p>

	Question	Stakeholder Comments
2.	Do you have any comments related to the draft proposed new COM-001-AB-3, <i>Communications</i> , that were not discussed at the July 2020 Stakeholder Session? If so, please comment.	<p>1. TransAlta requests that the AESO adds clarity to what constitutes</p> <ul style="list-style-type: none"> - “primary personal communication” in R3, R8, R10, R11, and R12. - “backup interpersonal communication” in R2, R4, and R9. Specifically, please provide more context on the AB version’s divergence from using verbiage “alternative interpersonal communication” as in NERC’s COM-001-3. - an “unsuccessful” test, in R9. <p>2. Pending the AESO’s clarification of terms listed above, TransAlta may then provide further input on whether “within 2 hours” is a reasonable timeframe, as proposed in R9. We are hesitant to provide input on the proposed time window as there are multiple unclear terms.</p>
3.	Do you have any comments related to the draft proposed amended Section 502.4, <i>Automated Dispatch and Messaging System</i> , that were not discussed at the July 2020 Stakeholder Session? If so, please comment.	<i>TransAlta requests additional 2 weeks to provide comments.</i>
4.	Do you have any comments related to the draft proposed amended Section 502.17, <i>Voice Communication System Requirements</i> , that were not discussed at the July 2020 Stakeholder Session? If so, please comment.	<i>TransAlta requests additional 2 weeks to provide comments.</i>
5.	Do you have any additional comments?	<i>TransAlta requests additional 2 weeks to provide comments.</i>

Thank you for your input. Please email your comments to: rules_comments@aeso.ca.

