Alberta Electric System Operator

New RSAW Roll Out

Alberta Reliability Standards – AESO Outreach

July 15, 2026

Learning Objectives

By the end of this session you will be able to:

✓ Understand the purpose of AESO RSAWs

✓ Complete RSAW sections consistently

✓ Develop effective compliance narratives

✓ Create useful evidence references

✓ Avoid common RSAW deficiencies

✓ Align RSAW responses with ALBERT submissions

Why AESO Introduced RSAWs

Objectives

AESO RSAWs are designed to:

✓ Improve transparency

✓ Improve consistency

✓ Improve audit efficiency

✓ Align with industry best practices

✓ Reduce evidence information requests

✓ Improve entity understanding of compliance expectations

RSAWs are NOT:

✗ Additional requirements

✗ New compliance obligations

✗ A substitute for the Reliability Standard

What has Changed?

Legacy RSAW:

- Demonstrate compliance
- List evidence
- Auditor-focused
- Requirement summaries
- Stand-alone evidence references
- Minimal explanation

New 'WECC Style' RSAW:

- Explain your compliance program
- Describe how compliance is achieved
- Entity-focused
- Compliance narratives
- Evidence linked directly to the narrative
- Clear description of processes, ownership, and implementation

Reliability Standard Audit Worksheet (RSAW)

Entities use the RSAW to:

- Describe how they comply with each ARS requirement and how the evidence supports that narrative
- List, index, and describe each piece of evidence, or the relevant information within the evidence
- Communicate relevant information that the AESO should consider in its assessment
- Understand the compliance assessment approach of the AESO ARS and Note to Auditor section

The AESO uses the RSAW to:

- Document its compliance assessment
- Validate and verify evidence
- Support assessment outcomes
- Retain as a record of ARS compliance assessment

Anatomy of an RSAW

The are the three main sections are completed by the Entity:

- **Audit Summary**
- **Entity Response**
- **Entity Evidence**

The remaining sections are completed by the Compliance Monitoring Entity (AESO)

What entities need to complete: RSAW Overview

Entity-facing sections of the RSAW:

- **Audit Summary** section
- **Entity Response** sections
  - Subject Matter Experts table
  - Requirement-specific questions, where applicable
  - Compliance Narrative fields
- **Entity Evidence** tables
  - Evidence file details, including file name, document title, revision/version, document date, relevant pages or sections, and description of applicability.

A strong Entity Response should:

- Directly answer the requirement-specific question and provide relevant details.
- Explain in the narrative how the entity complies with the requirement.
- Identify whether an event, activity, review, test, change, or obligation occurred during the audit period.
- Refer to evidence by file name.
- Point to the relevant page, section, tab, row, or data field where compliance is demonstrated.

What entities need to complete: Entity Response

The Compliance Narrative is the Entity's opportunity to explain **how compliance is achieved** for the applicable requirement.

It should answer:

What process satisfies the requirement?

Who performs the activity?

How is compliance achieved?

When is the activity performed?

What evidence demonstrates compliance?

What entities need to complete: Entity Evidence Table

The Entity Evidence table should:

Make the evidence easy to locate and assess.

Field	What entities should provide
File Name	The exact evidence file name, using the required naming convention.
Document Title	The title of the document or record.
Revision or Version	Revision number, version, or “N/A” if not applicable.
Document Date	Date of the document or record.
Relevant Page(s) or Section(s)	The exact page, section, tab, row, or location.
Description of Applicability	How the evidence supports or demonstrates compliance.

Evidence preparation expectations

Evidence should allow AESO to find and locate relevant information efficiently and effectively.

- Highlight or annotate evidence files to identify specific pages, paragraphs, or data that demonstrate compliance.
- Submit spreadsheet evidence in a format that permits copying, pasting, sorting, and filtering for sampling and analysis.
- Submit evidence that demonstrates compliance for the entire audit period, including all versions of procedures in effect during the audit period.
- Ensure PDF files are searchable and use bookmarks and annotations to indicate relevant evidence.
- Provide an example Level 2 evidence for further sampling.

File naming requirements

Evidence file names must:

- Include the ARS and requirement number.
- Be labelled sequentially beginning at 01.
- Have a meaningfully descriptive file name.
- Match the "File Name" column in the applicable RSAW's Entity Evidence table.
- For more details, please review the *Alberta Reliability Standards (ARS) Compliance Monitoring Evidence Guidelines and Instructions* document attached with the entity notification letter.

Non-applicable requirements

If a requirement is not applicable:

- State **N/A** under the File Name column in the RSAW.
- Explain why the requirement is not applicable in the Entity Response / Compliance Narrative section.

Alberta Evidence Request Tool (ALBERT)

- The ALBERT provides a structured framework (via a multi-tabbed spreadsheet) to guide you in organizing and presenting your evidence consistently
- It standardizes your Level 1 data submittal such as assets, systems & personnel lists into a single formatted list which can be used by the auditor for sampling your Level 2 evidence (individual records)
- ALBERT is only used for the ARS which have specific tabs within the tool itself
- It is important that you provide all the required information within the ALBERT and submit it with the new RSAW
- You may use the ALBERT outside of compliance monitoring activities to aid in compliance reporting and maintaining data lists

Key takeaways

Three key takeaways:

- The RSAW should tell a clear compliance story: what happened, how the entity complies, and where the supporting evidence is located.
- Evidence must be organized, searchable, and traceable to the requirement or sub-requirement in scope.
- Evidence file names must match the File Name column in the RSAW Entity Evidence table.

What Good Looks Like

Strong RSAWs:

✓ Explain compliance rather than restating the requirement.

✓ Reference evidence throughout the narrative.

✓ Clearly identify responsible personnel.

✓ Direct the auditor to specific supporting evidence.

✓ Minimize clarification requests and follow-up Information Requests.

Weak RSAWs:

✗ Repeat requirement language.

✗ Say "Compliant" or "See attached evidence."

✗ List evidence without explaining its relevance.

✗ Require the auditor to determine how compliance is achieved.

✗ Make auditors search through large volumes of evidence.

Audit Summary

Purpose

- Provides administrative information regarding the monitoring activity.

Key Sources

- Audit Notification Letter
- COP
- RSAW Scope
- ALBERT Cover Sheet

Entity	Entity name; or the ISO.
Functional Entity Type(s)	Functional entity types applicable to the Entity during the audit period; or the ISO.
Audit ID	
Audit Period (Audit start date or standard effective date, whichever comes later) (Audit end date or standard withdrawal/supersede date, whichever comes first)	From: Click or tap to enter a date. To: Click or tap to enter a date.
Audit Assessment Start Date (Scheduled or Spot Check)	Click or tap to enter a date.
Compliance Monitoring Entity	Alberta Electric System Operator (AESO) for Alberta Entities or WECC on behalf of the Market Surveillance Administrator (MSA) for the ISO.
Date of Audit Completion	Click or tap to enter a date.

Audit Summary – Good Example

Why It's Good

✓ Matches audit notification
✓ Uses legal entity name
✓ Uses correct audit period

Note: Date of Audit Completion entered by the AESO

Audit Summary

Entity	ABC Energy Ltd.
Functional Entity Type(s)	Operator of an aggregated generating facility Legal owner of an aggregated generation facility
Audit ID	2026-A08-ABC
Audit Period (Audit start date or standard effective date, whichever comes later) (Audit end date or standard withdrawal/supersede date, whichever comes first)	From: September 1, 2022 To: August 31, 2025
Audit Assessment Start Date (Scheduled or Spot Check)	April 14, 2026
Compliance Monitoring Entity	AESO
Date of Audit Completion	Click or tap to enter a date.

Audit Summary – Poor Example

Why It's Poor

✗ Insufficient detail

✗ Does not match audit scope

Audit Summary

Entity	ABC
Functional Entity Type(s)	NERC Registered Entity
Audit ID	Audit 1
Audit Period (Audit start date or standard effective date, whichever comes later) (Audit end date or standard withdrawal/supersede date, whichever comes first)	2025
Audit Assessment Start Date (Scheduled or Spot Check)	June 1, 2026
Compliance Monitoring Entity	
Date of Audit Completion	July 1, 2026

Subject Matter Experts

Purpose

- Identify personnel who can explain:
- Compliance activities
- Evidence
- Operational processes
- Technical controls

AESO Expectations

- SMEs should be able to:
  - ✓ Participate in interviews
  - ✓ Explain compliance activities
  - ✓ Explain submitted evidence

Subject Matter Experts

Identify the Subject Matter Expert(s) responsible for this Reliability Standard.

Entity Response *(Required; Insert additional rows if needed)*:

SME Name	Title	Organization	Requirement(s)

Subject Matter Experts – Good Example

Why It's Good

✓ Clear ownership

✓ Appropriate expertise

✓ Supports interviews

Entity Response *(Required; Insert additional rows if needed)*:

SME Name	Title	Organization	Requirement(s)
Jane Smith	Compliance Manager	ABC Energy Ltd.	R1, R2
Robert Jones	OT Cyber Security Lead	ABC Energy Ltd.	R1
Michael Brown	CIP Senior Manager	ABC Energy Ltd.	R2

Subject Matter Experts – Poor Example

Why It's Poor

✗ Unclear expertise

✗ No ownership

✗ Insufficient detail

Entity Response *(Required; Insert additional rows if needed)*:

SME Name	Title	Organization	Requirement(s)
Sarah	Administrator	ABC Energy Ltd.	All

Compliance Narrative

Most Important RSAW Section

The narrative tells the compliance story.

Entity Response (Required):

Compliance Narrative:

Provide a brief explanation of how you comply with this Requirement. References to supplied evidence, including links to the appropriate page are recommended.

Narrative Should Explain

- What is done
- Who performs it
- How it works
- When it occurs
- What evidence supports it

Compliance Narrative – Good Example

Why It's Good

✓ Explains process

✓ Identifies responsibilities

✓ References evidence

✓ Explains implementation

Entity Response ***(Required):***

Compliance Narrative:

Provide a brief explanation of how you comply with this Requirement. References to supplied evidence, including links to the appropriate page are recommended.
ABC Energy Ltd. maintains the *BES Cyber System Identification and Categorization Procedure* (CIP-002-R1-01-Procedure.pdf), which establishes the process for identifying and categorizing BES Cyber Systems. Engineering and Cyber Security personnel assess each applicable asset against the criteria defined in CIP-002-AB-5.1 Attachment 1, as implemented within Sections 4–8 of the procedure, to determine the presence of High, Medium, or Low Impact BES Cyber Systems. Assessments are performed at least annually and following material system changes. Results are documented in the *BES Cyber System Inventory and Categorization Register* (CIP-002-R1-02-CIP002_Assessment.xlsx) and formally approved by the CIP Senior Manager (CIP-002-R1-03-CSM_Approval.pdf). Supporting evidence, including the inventory of applicable assets and categorization outcomes, is available for sampling within the CIP Evidence Request Tool (CIP Evidence Request Tool_ABC.xls).

Compliance Narrative – Poor Example

Why It's Poor

- ✗ No explanation
- ✗ No evidence references
- ✗ No process description
- ✗ Auditor must determine compliance

Entity Response *(Required)*:
Compliance Narrative:

Provide a brief explanation of how you comply with this Requirement. References to supplied evidence, including links to the appropriate page are recommended.
The Entity complies with CIP-002. See uploaded files.

Entity Evidence Table

Purpose

Provides a roadmap to the evidence package.

Auditors should be able to:

- Locate evidence
- Understand relevance
- Verify compliance

Entity Evidence *(Required):*

The following information is requested for each document submitted as evidence. Also, evidence submitted should be highlighted and bookmarked/annotated, as appropriate, to identify the exact location where evidence of compliance may be found.					
File Name	**Document Title**	**Revision or Version**	**Document Date**	**Relevant Page(s) or Section(s)**	**Description of Applicability of Document**

Entity Evidence - Good Example

Why It's Good

✓ Specific

✓ Easy to locate

✓ Explains relevance

Entity Evidence (Required):

The following information is requested for each document submitted as evidence. Also, evidence submitted should be highlighted and bookmarked/annotated, as appropriate, to identify the exact location where evidence of compliance may be found.					
File Name	**Document Title**	**Revision or Version**	**Document Date**	**Relevant Page(s) or Section(s)**	**Description of Applicability of Document**
CIP-002-R1-01-Procedure.pdf	BES Cyber System Identification and Categorization Procedure	Rev 5	2025-06-01	Pages 10-18, Sections 4-8	Demonstrates the documented process used to identify and categorize BES Cyber Systems.
CIP-002-R1-02-CIP002_Assessment.xlsx	BES Cyber System Inventory and Categorization Register	Rev 3 (2025)	2025-11-15	Worksheets "Asset Review" and "Categorization Results"	Demonstrates completion of the annual categorization assessment and resulting impact determinations.
CIP-002-R1-03-CSM_Approval.pdf	CIP Senior Manager Approval Record	N/A	2025-11-20	Page 1	Demonstrates approval of categorization results as required by R2.2.
CIP Evidence Request Tool_ABC.xls	CIP Evidence Request Tool	v2026	2025-11-20	BES Assets Tab	Output of BES Asset identification and categorization for AESO Evidence Requests.

Entity Evidence - Poor Example

Why It's Poor

- ✗ No guidance
- ✗ No relevance explanation
- ✗ Auditor must search entire document

***Entity Evidence** (Required):*

The following information is requested for each document submitted as evidence. Also, evidence submitted should be highlighted and bookmarked/annotated, as appropriate, to identify the exact location where evidence of compliance may be found.					
File Name	**Document Title**	**Revision or Version**	**Document Date**	**Relevant Page(s) or Section(s)**	**Description of Applicability of Document**
Procedure.pdf	Procedure			Entire Document	Procedure
Assessment.xlsx	Assessment			Entire Workbook	Assessment

Common Deficiencies Seen During Audits

Most Common

- ✗ "See attached evidence"
- ✗ Missing SMEs
- ✗ Missing evidence references
- ✗ Entire document references
- ✗ Generic applicability descriptions
- ✗ Evidence without implementation records
- ✗ Narrative that repeats the requirement

RSAW preparation

AESO encourages Entities to review its RSAWs prior to evidence submission.

Incomplete RSAWs lead to:

- Information requests
- Increases in administrative burden
- Audit delays and inefficiencies

AESO Auditor Expectations

Narrative = Explain Compliance

Evidence Table = Locate Compliance Evidence

Evidence = Demonstrate Compliance

RSAW + Evidence = Audit Readiness

Thank You!

Continued collaboration is key to success

If you have any questions, please our AESO team at rscompliance@aeso.ca