



Consultation on Proposed New “technical feasibility exception” Alberta Reliability Standard Definition (“New “technical feasibility exception” definition”)

Date of Request for Comment: <u>October 18, 2016</u>	Contact: <u>Dan Bamber</u>
Period of Consultation: <u>October 18, 2016</u> through <u>November 25, 2016</u>	Phone: <u>780 509-9152</u>
Comments From: <u>ATCO Electric Ltd.</u>	Email: <u>Dan.bamber@atco.com</u>
Date [yyyy/mm/dd]: <u>2016/11/18</u>	

Listed below is the summary description of changes for the proposed New “technical feasibility exception” definition. Please place your comments/reasons for position underneath (if any).

Definitions – New		
Existing	Proposed	Market Participant Comments and/or Alternate Proposal
No definition currently exists in the Alberta Reliability Standards	“technical feasibility exception” means a variance from a requirement in the CIP Cyber Security reliability standards that achieves a level of reliability of the bulk electric system that is comparable to or higher than compliance with the requirement.	<i>Comment # 1: ATCO Electric thanks AESO for the opportunity to comment on this new definition.</i> <i>AE believes the word ‘reliability’ in the sentence, level of reliability... should be changed to ‘security’. The meaning between these two words is totally different and we believe that the CIP standards are all about the security of the grid. Systems must be secured to ensure grid reliability, so in this context, the TFE is all about maintaining an appropriate level of security. NERC, in their Appendix 4D of the ROP Section 3.2 also uses the word ‘security’. If the intent is to stick close to the NERC version, AB should not be straying away.</i>