



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

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Period of Consultation: <u>October 18, 2016</u> through <u>November 25, 2016</u>	Phone: <u>+1 (403) 387-8275</u>
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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	<i>“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:A definition of a technical feasibility exception is provided in the Nerc Directive 4d as being “An exception from Strict Compliance with the terms of an Applicable Requirement, or part thereof, on grounds of technical feasibility or technical limitations in accordance with one or more of the criteria in Section 3.0 of Appendix 4d” . While the text of the proposed definition is extracted from the Nerc Directive 4d the original intent of that text was to contextualize its definition not replace its definition. Furthermore the definition does not align to Section 3 of ID #2016-005RS as it misses out the first line which states “ A TFE does not relieve a Responsible Entity from its obligation to comply with the requirement of a CIP ARS”