

Proposed New Alberta Reliability Standard CIP-014-AB-2, *Physical Security* (“CIP-014-AB-2”)

Date of Request for Comment: June 15, 2018  
Period of Comment: May 31, 2018 through June 15, 2018  
Comments From: ATCO Electric Ltd.  
Date [yyyy/mm/dd]: 2018/06/14

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Listed below is the summary description of changes for the proposed CIP-014-AB-2. Please refer back to the Consultation Letter under the “Attachments” section to view materials related to the proposed new CIP-014-AB-2. Please place your comments/reasons for position underneath (if any).

Alberta Reliability Standard	Market Participant Comments and/or Alternative Proposal
<p><b>New</b></p> <p>The AESO is seeking comments from market participants with regard to the following matters:</p> <ol style="list-style-type: none"><li>Are there any requirements contained in proposed CIP-014-AB-2 that are not clearly articulated? If yes, please indicate the specific section of proposed CIP-014-AB-2, describe the concern and suggest alternative language.</li><li>Please provide any additional comments regarding proposed CIP-014-AB-2.</li></ol>	<p><i>ATCO Electric appreciates the opportunity to comment and has the following Comments/Questions:</i></p> <p><i>(R1) Can the AESO provide a definition of instability and uncontrolled separation to ensure MP’s fully understand and ensure compliance as ‘cascading’ already is a defined term.</i></p> <p><i>It not clear on which agencies listed in R4.3 that we would need to coordinate with? If we don’t interact with some, is that acceptable to disregard? Do we need to show that we evaluated all of the threats in each of the agencies even if it a US agency?</i></p> <p><i>Does R4 need to be completed as part of completing R5? Do we need to be compliant with R4 in the same timeline as R5. ATCO would appreciate it if AESO could supply a timeline for compliance to the Requirements as it is somewhat difficult to understand and ensure that we are fully compliant at the correct intervals.</i></p> <p><i>What happens if we can’t meet the timelines because of availability of the third part resouces, geographic locations, number of sites, etc in scope in R6.2; ATCO would suggest the ability to apply for an extension under R6.2 if the 90 days can not be met.</i></p> <p><i>What is an “unaffiliated” third party under R6.1? The measure for R6.1 wants us to show evidence that we selected an unaffiliated third party. What constitutes acceptable evidence? Can we use a non-regulated</i></p>

	<i>sister company?</i>
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