

July 28, 2020

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

Re: **Letter of Notice for additional feedback on draft Proposed New and Amended Communication ISO Rules and Reliability Standards**

The AESO would like to thank all participants for attending the Stakeholder Consultation Session on the Development of the Proposed New and Amended Communication ISO Rules and Reliability Standards held on July 20, 2020 (the “July 2020 Stakeholder Session”).

The AESO appreciates the Stakeholder feedback we received at the July 2020 Stakeholder Session. If you were unable to attend the July 2020 Stakeholder Session or you have additional comments that were not discussed at the session, the AESO would like to invite Stakeholders to provide those comments at this time. As a reminder, the AESO will be posting the meeting minutes of the July 2020 Stakeholder Session once they have been drafted and reviewed by the attendees.

Summary of July 2020 Stakeholder Session Feedback Received

The AESO heard the following questions and comments regarding the draft proposed new COM-001-AB-3, *Communications* (“COM-001-AB-3”) and the draft proposed new Section 502.17 of the ISO Rules, *Voice Communication System Requirements* (“Section 502.17”):

- COM-001-AB-3
 - o There was interest in the AESO defining “interpersonal communication” or adding the word “voice” to give clarity to market participants that the expectation is that the primary and backup communication systems refer to voice communication systems, as is indicated in Section 502.17.
 - o An attendee requested that the AESO review requirement R3 and clarify if and how an operator of a transmission facility should comply with requirement R3(d) in a specific situation. In the situation described, the operator of a transmission facility is also registered as an operator of an aggregated generating facility and those facilities are operated from different rooms in the same building.
 - o Attendees requested that the AESO review requirement R12 to ensure 2-way radio can be used to fulfill their internal primary interpersonal communication system requirements.
 - o There was a request for the AESO to consider if cell phones can temporarily be used to fulfill backup interpersonal communication system requirements in situations where the backup interpersonal communication system fails during a test.
 - o Attendees requested that the AESO provide clarity in an information document regarding the backup interpersonal communication system testing in requirement R9. Specifically, they asked whether an echo or a delay of a satellite phone during backup interpersonal communication system testing constitutes a failed test in situations where the operator of a transmission facility uses a satellite phone service as a backup interpersonal communication system.

- Section 502.17
 - o Attendees requested clarity regarding the roles and responsibilities of market participants as they pertain to backup voice communication requirements, including coordination, and implementation timelines. Specifically, market participants stated that there was ambiguity and uncertainty as it relates to the expectations of the operator of a transmission facility in facilitating compliance with adjacent market participants. In addition, an attendee requested that the AESO play a more central role in managing commercial agreements between operators of transmission facilities and adjacent market participants.
 - o Attendees requested clarity on the funding mechanism for operators of generating units. Specifically, if uplift costs would be covered.
 - o An attendee requested clarity on the primary voice communication requirements outlined in draft subsection 2. Specifically, if all associated voice communication system equipment had to be located in its control centre and control room.
 - o An attendee requested clarity on subsection 2(c), specifically if a cell phone can be used as a “direct access telephone” for the purpose of fulfilling this requirement.
 - o An attendee asked if the AESO has conducted a comparison between utility orderwire service and other voice communication system technologies, other than satellite phone, and, if so, why the AESO chose utility orderwire system.
 - o An attendee asked if the AESO’s expectation is that the proposed utility orderwire system would be based on voice over IP (“VOIP”) technology.

Additional Stakeholder Comments on Draft COM-001-AB-3, Section 502.17, and Section 502.4 of the ISO rules, *Automated Dispatch and Messaging System* (“Section 502.4”)

Please use the *Stakeholder Comment Matrix – Development of Proposed Communication ISO Rules and Standards* when submitting comments to the AESO. Stakeholders should ensure that comments provided represent all interests within their organization.

The deadline for Stakeholders to provide comments is August 19, 2020, to rules_comments@aeso.ca. Adherence to deadlines is essential to the integrity of the comment process, and as such, the AESO may choose not to consider any Stakeholder comments received after the deadline.

The AESO anticipates that it will publish all Stakeholder comments, received by the deadline, on the AESO website by the end of August 2020.

Related Materials

1. [Stakeholder Comment Matrix – Development of Proposed Communication ISO Rules and Standards](#) for the draft proposed new COM-001-AB-3, draft proposed new Section 502.17, and draft proposed amended Section 502.4.

Sincerely,

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