

October 9, 2018

To: Market Surveillance Administrator, Market Participants and Other Interested Parties

Re: **Letter of Notice for Development of a Proposed New and Amended ISO Rule:**

- (a) **New Section 502.17 of the ISO Rules, *Voice Communication System Requirements* (“proposed new Section 502.17”); and**
- (b) **Amendments to Section 502.4 of the ISO Rules, *Automated Dispatch and Messaging System and Voice Communication System Requirements* (“proposed amended Section 502.4”)**

collectively referred to as the “New and Amended ISO Rules”.

Pursuant to Section 4 of Alberta Utilities Commission Rule 017: *Procedures and Process for Development of ISO Rules and Filing of ISO Rules with the Alberta Utilities Commission*, the Alberta Electric System Operator (“AESO”) is providing notice and seeking feedback from the Market Surveillance Administrator, market participants, and other interested parties (“Stakeholders”) on the development of the proposed New and Amended ISO Rules.

Applicability

The proposed new Section 502.17 is applicable to:

- (a) the following electricity market participants:
 - (i) the operator of a generating unit with a maximum authorized real power of 5 MW or greater;
 - (ii) the operator of an aggregated generating facility with an aggregated maximum authorized real power of 5 MW or greater;
 - (iii) the operator of a transmission facility;
 - (iv) the operator of an electric distribution system; and
 - (v) a pool participant; and
- (b) the AESO.

The proposed amended Section 502.4 is applicable to:

- (a) a pool participant who may receive a dispatch or a directive in the electricity market; and
- (b) the AESO.

Issue

The AESO has identified that certain amendments to the following authoritative documents are necessary to address content overlap and to improve the clarity of the requirements in:

- (a) [Alberta Reliability Standards COM-001-AB1-1.1, *Telecommunications* \(“COM-001-AB1-1.1”\);](#)
- (b) [Alberta Reliability Standards COM-002-AB1-2a, *Communications and Coordination* \(“COM-002-AB1-2a”\);](#)

- (c) [Section 502.4 of the ISO Rules, Automated Dispatch and Messaging System and Voice Communication System Requirements \("Section 502.4"\)](#).

Background

Alberta reliability standards COM-001-AB1-1.1 and COM-002-AB1-2a were adopted in Alberta on October 1, 2013. The purpose of these reliability standard is to ensure the AESO and each operator of a transmission facility have adequate and reliable voice and message telecommunication facilities internally and with others for the exchange of interconnection and operating information necessary to maintain reliability.

Existing Section 502.4 prescribes the minimum Automated Dispatch and Messaging System and voice communication systems requirements for market participants with facilities in Alberta, other than those to which COM-001-AB1-1.1 and COM-002-AB1-2a apply.

The AESO has recently determined that greater clarity is required regarding the facilities to which COM-001-AB1-1.1 and COM-002-AB1-2a are applicable, and to eliminate any potential overlap with existing Section 502.4.

Since the adoption of COM-001-AB1-1.1 and COM-002-AB1-2a in Alberta, the corresponding NERC standards have been revised¹ resulting in a consolidation of the subject matter, an enhanced clarity in the wording of the requirements, and a significant shift in the focus and content of NERC COM-002-4, which now primarily addresses operations communication protocols rather than communications facilities.

Objectives/Purpose

The AESO intends to consult on and forward retirement of existing COM-001-AB1-1.1 and COM-002-AB1-2a, and to consult on and file amendments to the New and Amended ISO rules at the same time. The purpose and objective of these amendments are as follows:

- COM-001-AB1-1.1: To be retired as the requirements will be addressed in proposed new Section 502.17;
- COM-002-AB1-2a: To be retired and replaced with COM-002-AB-4 which focuses on reducing the possibility of miscommunications through requirements for predefined communication protocols;
- Proposed amended Section 502.4: To be amended so as to retain the details related to Automated Dispatch and Messaging System requirements and accountabilities for electricity market participants and the AESO; and
- Proposed new Section 502.17: To be drafted to combine all voice communication requirements and accountabilities for electricity market participants and the AESO from Sections 502.4 and NERC COM-001-3 in a single document.

Consultation Completed to Date

The AESO has been developing the New and Amended ISO Rules since before August 1, 2018, when new AUC Rule 017 came into effect and has undertaken the following consultation with Stakeholders that are part of the Telecommunication Workgroup and Stakeholders² that are part of the Alberta Reliability Committee Discussion Group³:

¹ The NERC reliability standards COM-001-2.1, *Communications* ("NERC COM-001-2.1"), and COM-002-4, *Operating Personnel Communications Protocols* ("NERC COM-002-4").

² Members of this group are selected based on knowledge and involvement of how to operate a utility telecommunications network and are the major transmission facility owners and operators and electric distribution facility owners and operators Alberta.

³ Members of this group are selected based on knowledge and involvement with the issues of the Alberta reliability standards implementation project.

- (a) the AESO met with the Telecommunication Work Group on March 14, 2018 to discuss the aspects of the New and Amended ISO Rules;
- (b) the AESO hosted two conference calls with the Telecommunication Work Group and interested members of the Alberta Reliability Committee Discussion Group to review a working draft of the proposed new Section 502.17 and to seek feedback. The conference call sessions occurred on May 24, 2018 and May 30, 2018; and
- (c) the Alberta Reliability Committee Discussion Group discussed the details of proposed new Section 502.17 and proposed amended Section 502.4 at a meeting on May 2, 2018.

Proposed Consultation and Timeline

The AESO is of the view that it has met the intention of sections 6.1 and 6.2 of AUC Rule 017 as a result of the consultation completed to date. Therefore, the AESO is proposing to move directly to issuing draft versions of the proposed New and Amended ISO Rules and soliciting comments pursuant to section 6.3 of AUC Rule 017.

While stakeholders have had the opportunity to provide comment on whether a proposed ISO rule is needed, and on the information required in subsection 7.2(b) - 7.2(j) of AUC Rule 017 as part of the consultation completed to date, the AESO intends to provide stakeholders with the additional opportunity to provide comment on these matters in the matrices it issues pursuant to section 6.3 of AUC Rule 017.

The AESO proposes the following timeline for consultation:

- 1) October 30, 2018 - Post Stakeholder comments received on this Letter of Notice for Development of the proposed New and Amended ISO Rules;
- 2) November 6, 2018 - Post drafts of the proposed New and Amended ISO Rules for written comment in conjunction with the retirement of existing COM-001-AB1-1.1 and COM-002-AB1-2a;
- 3) November 21, 2018 - Deadline for submitting written comments proposed New and Amended ISO Rules;
- 4) December 6, 2018 - Post all written comments and provide written responses to the comments; and
- 5) December 11, 2018 – Submit Application for Commission Approval of proposed New and Amended ISO rules in conjunction with the retirement of existing COM-001-AB1-1.1 and COM-002-AB1-2a.

Stakeholder Comments

Stakeholders may submit:

- (i) written comments regarding the need for the New and Amended ISO Rules;
- (ii) a notice of intent to participate in this consultation; and
- (iii) comments on the form of consultation;

Please use the *Stakeholder Comment Matrix – Development of Proposed ISO Rule* 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 October 24, 2018, 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 will publish all Stakeholder comments, received by the deadline, on the AESO website on October 30, 2018.

If no comments are received by the AESO regarding the proposed New and Amended ISO Rules, the AESO will post the proposed new and amended ISO rules for written consultation.

Related Materials

1. [Stakeholder Comment Matrix](#) – *Development of Proposed ISO Rule* for the proposed new and amended ISO rule;
2. [Alberta Reliability Standards COM-001-AB1-1.1, Telecommunications](#) (“COM-001-AB1-1.1”);
3. [Alberta Reliability Standards COM-002-AB1-2a, Communications and Coordination](#) (“COM-002-AB1-2a”);
4. [Section 502.4 of the ISO Rules, Automated Dispatch and Messaging System and Voice Communication System Requirements](#) (“Section 502.4”);
5. [NERC Reliability Standard COM-001-2.1, Communications](#) (“NERC COM-001-2.1”); and
6. [NERC Reliability Standard COM-002-4, Operating Personnel Communications Protocols](#) (“NERC COM-002-4”).

Sincerely,

Melissa Mitchell-Moisson

Regulatory Coordinator
Legal & Regulatory Affairs
melissa.mitchell-moisson@aeso.ca
403-539-2948