

Proposed New Section 304.8 of the ISO rules, Event Analysis ("new Section 304.8")

Date of Request for Comment: August 29, 2017

Period of Comment: August 29, 2017 through September 15, 2017

Comments From: AltaLink

Date [yyyy/mm/dd]: 2017/09/15

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Listed below is the summary description of changes for the proposed new Section 304.8. Please refer back to the Letter of Notice under the "Attachments to Letter of Notice" section to view the actual proposed content changes to the ISO rules. Please place your comments/reasons for position underneath (if any).

## ISO Rules

## New

The AESO is seeking comments from market participants with regard to the following matters:

- 1. Do you agree or disagree with the proposed new Section 304.8? If you disagree, please provide comments.
- 2. Are there any subsections where the language does not clearly articulate the requirement for either the AESO or a market participant? If yes, please indicate the subsections and suggest language that would improve the clarity.

## Market Participant Comments and/or Alternate Proposal

- 1. AltaLink supports the new Section 304.8.
- 2. AltaLink has the following comments on the new Section 304.8:
  - Section 7(4):
    - Suggest the inclusion of a timeframe for the responsible entity to provide the notification to the ISO once the recommendation has been implemented.
    - o Timeframe could be within five (5) business days following implementation.
  - Section (8):
    - Suggest the inclusion of a requirement for the ISO to consult the responsible entity prior to publishing the Lessons Learned document to ensure no confidential information, as deemed by the responsible entity, is published on the AESO website.
  - Section (8) 2:
    - Suggest the following edit:
      - "A Lessons Learned document may will not contain any of the following information".
  - Appendix 1 Category 1 (e):
    - Events applicable to items (i) to (iv) are already reported to the ISO under 304.7. It is understood that the reporting requirements are different between 304.7 and 304.8. To avoid the potential for inconsistent treatment, and for efficient use of resources it is suggested to exclude these items in 304.8. If further information is required when reported under 304.7 the ISO can make that request to the responsible entity.
  - Appendix 1 Category 2 (a):
    - o Events applicable to items (i) to (iii) are already reported to the ISO under 304.7.
    - As noted in the comments above for Appendix 1 Category 1 (e), suggest these items be excluded from 304.8.