

Proposed Removal of Existing Operating Policies and Procedure 1304, *System Event Monitoring and Disturbance Reporting* (“OPP 1304”)

Date of Request for Comment:	<u>August 29, 2017</u>	
Period of Comment:	<u>August 29, 2017</u>	through <u>September 15, 2017</u>

ISO Rules	Market Participant Comments and/or Alternate Proposal	AESO Replies
<p>Removal</p> <p>The AESO is seeking comments from market participants with regard to the following matters:</p> <ol style="list-style-type: none"> Do you agree or disagree with the proposed removal of existing OPP 1304? If you disagree, please provide comments. 	<p><u>TransCanada Energy Ltd. (“TCE”)</u></p> <p>TCE appreciates the opportunity to comment on the proposed changes. Overall, TCE supports the proposed changes subject to some minor revisions that reflect the current requirements pursuant to OPP 1304 as expressed below:</p> <ol style="list-style-type: none"> In the event the AESO competes an additional report under subsection 6 that makes recommendations of a Responsible Entity, subsection 7(3)(a) of proposed ISO Rule 304.8, Event Analysis (Proposed Rule), requires that Responsible Entity to “implement each applicable recommendation by the implementation date”. OPP 1304 requires the facility owner or operator to “[t]ake immediate action to resolve the outstanding issues presented in the report recommendations (action items with timelines) or as directed by the ISO.” While the requirements between the Proposed Rule and OPP 1304 are similar, they are not the same in one primary respect. The language used in OPP 1304 provides the Responsible Entity with the discretion as to how to resolve the issue, whereas the Proposed Rule could be very restrictive. <p>TCE submits that the Responsible Entity, given its familiarity with its assets, is in the best position to determine the optimal way to resolve an outstanding issue and should be given such discretion. TCE proposes that subsection 7(3)(a) in the Proposed Rule be amended to state “resolve outstanding issues associated with each applicable recommendation by the implementation date; or”.</p> <ol style="list-style-type: none"> Section 3.1 of OPP 1304 states that “[t]he disturbance report 	<ol style="list-style-type: none"> The AESO agrees and has amended subsection 7(4)(a) of proposed new Section 304.8 of the ISO rules, <i>Event Analysis</i> (“Section 304.8”) (previous subsection 7(3)(a)) to require each Responsible Entity to implement each applicable recommendation by resolving the outstanding issues associated with each recommendation by the implementation date. The AESO recognizes TCE’s concern and has added

	<p>will not be made public; the dissemination of sensitive information will be done with due regard for the interests of facility owners and facility operators.” Subsection 7 of the Proposed Rule permits the AESO to identify Responsible Entities and provide a copy of the report completed under section 6 to each Responsible Entity. TCE is concerned that the report may become public and that the identity of the Responsible Entities may not be kept confidential. TCE strongly encourages the AESO to take the same precautions in the Proposed Rule as it did in OPP 1304. At a minimum, TCE recommends that the names of the Responsible Entities be redacted from the report provided to other Responsible Entities.</p> <p>3. TCE has a similar concern with respect to the Lessons Learned document under section 8 of the Proposed Rule. In this regard, TCE recommends the word “may” in subsection 8(2) be replaced with “must” to provide clarity that none of the information listed in that subsection will be made public in a Lessons Learned document. In addition, TCE recommends that the exclusions list from subsection 8(2) also include “any details that would otherwise permit identification of market participants or facilities”.</p>	<p>subsection 7(3) of proposed new Section 304.8 to state that “[s]ubject to subsection 7(2), the ISO and each Responsible Entity identified under subsection 7(1) must treat a report provided under subsection 7(2)(a) as confidential.” The AESO does not consider that redacting the names of the Responsible Entities from the report provided to other Responsible Entities would prevent the disclosure of whom was involved in the event, given the size the of the Alberta electricity market.</p> <p>3. The AESO agrees and has revised and subsection 8(2) of proposed new Section 304.8 to replace “may” with “must” and has added “to the extent practicable, any details that would otherwise permit identification of market participants or facilities” to the exclusion list.</p>
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