

November 28, 2019

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

Re: Update on AESO Consultation:

- 1) Retirement of Existing Alberta Reliability Standards:
 - a) Proposed retirement of existing Alberta Reliability Standard COM-001-AB1-1.1, *Telecommunications* ("COM-001-AB1-1.1");
 - b) Proposed retirement of existing Alberta Reliability Standard COM-002-AB1-2a, Communications and Coordination ("COM-002-AB1-2a");
- 2) New Alberta Reliability Standard:
 - a) Proposed new Alberta Reliability Standard COM-002-AB-4, *Operating Personnel Communication Protocols* ("COM-002-AB-4"); and
- 3) Revised Recommendation to Adopt rather than Reject North American Electric Reliability Corporation ("NERC") Reliability Standard:
 - a) COM-001-3, Communications ("NERC COM-001-3", to be named "COM-001-AB-3")

collectively referred to as "COM Standards";

- 4) Proposed amendments to Section 502.4 of the ISO rules, Automated Dispatch and Messaging System and Voice Communication System Requirements ("Section 502.4"); and
- 5) Proposed new Section 502.17 of the ISO rules, *Voice Communication System Requirements* ("Section 502.17").

On October 9, 2018, the Alberta Electric System Operator ("AESO") issued a <u>Letter of Notice for Development of a Proposed New and Amended ISO Rule</u> and seeking feedback from Stakeholders regarding proposed changes to the COM Standards, proposed amended Section 502.4, and proposed new Section 502.17.

In the Letter of Notice, the AESO explained that it had identified that certain amendments to authoritative documents were necessary to address content overlap, and to improve requirement clarity by separating and streamlining Automated Dispatch and Messaging System and voice communication requirements. The original proposed approach to meet this objective entailed amending Section 502.4 to retain the Automated Dispatch and Messaging System requirements; creating a single ISO rule, being proposed new Section 502.17, for all voice communication requirements including the requirements currently contained in Section 502.4 and NERC COM-001-3; and amending, rejecting, or retiring, as appropriate, Alberta reliability standards.

On March 19, 2019, the AESO issued the <u>Consultation Letter</u> requesting Stakeholder feedback on the proposed changes to the COM Standards. This included a copy of the proposed retired COM-001-AB1-1.1 and COM-002-AB1-2a, proposed new COM-002-AB-4, and a proposal to reject for adoption NERC COM-001-3. This was followed by the <u>Stakeholder Comments Letter</u>, which was posted with the written comments received from Stakeholders on April 9, 2019. On April 30, 2019, the AESO posted the <u>AESO</u>

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<u>Reply Letter</u> with its replies to Stakeholder comments along with its revised proposed new COM-002-AB-4 that addressed a Stakeholder comment.

The AESO originally intended to forward, to the Alberta Utilities Commission ("Commission"), its retirements of existing COM-001-AB1-1.1 and COM-002-AB1-2a, proposed new COM-002-AB-4, and proposed rejection of NERC COM-001-3 in conjunction with the filing of its applications for approval of proposed amended Section 502.4 and proposed new Section 502.17. However, based on Stakeholder feedback, it is clear that the proposed amended Section 502.4 and proposed new Section 502.17 require further review and consultation.

In an effort to advance the proposed changes to the COM standards, the AESO now proposes to unlink the development of the COM standards from the development of proposed amended Section 502.4 and proposed new Section 502.17. The AESO is satisfied that the consultation on the proposed new COM-002-AB-4 and the proposed retired COM-001-AB1-1.1 and COM-002-AB1-2a is complete. In order to move ahead, the AESO proposes to now consult on the adoption of NERC COM-001-3, which will be named COM-001-AB-3, and subsequently forward to the Commission the proposed changes to the COM Standards. The AESO currently anticipates beginning consultation on the proposed new COM-001-AB-3 in late 2019 or early 2020.

The AESO thanks all Stakeholders for their participation in <u>consultation to date</u> and looks forward to continuing the development of proposed amended Section 502.4 and proposed new Section 502.17. The AESO will inform Stakeholders of next steps related to proposed amended Section 502.4 and proposed new Section 502.17 in due course.

Sincerely,

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