



Consultation on Proposed New “technical feasibility exception” Alberta Reliability Standard Definition (“New “technical feasibility exception” definition”)

Date of Request for Comment: <u>October 18, 2016</u>	Contact: <u>Hameed Zaman</u>
Period of Consultation: <u>October 18, 2016</u> through <u>November 3, 2016</u>	Phone: <u>403-267-3715</u>
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Listed below is the summary description of changes for the proposed New “technical feasibility exception” definition. Please place your comments/reasons for position underneath (if any).

Definitions – New		
Existing	Proposed	Market Participant Comments and/or Alternate Proposal
No definition currently exists in the Alberta Reliability Standards	“ technical feasibility exception ” means a variance from a requirement in the CIP Cyber Security reliability standards that achieves a level of reliability of the bulk electric system that is comparable to or higher than compliance with the requirement.	<p><i>Comment # 1: Insert Comments / Reason for Position (if any)</i></p> <p>TransAlta is of the view that the proposed definition should be modified as follows:</p> <p>“technical feasibility exception” means a variance from a requirement in the CIP Cyber Security reliability standards that achieves a level of reliability security of the bulk electric system that is comparable to or higher than compliance with the requirement.</p> <p>TransAlta believes the use of the word security, as in NERC’s <i>Appendix 4D to the Rules of Procedures</i>, is more appropriate in the context of technical feasibility exceptions and provides clarity for market participants when considering an application for a technical feasibility exception.</p>