

Market Participant Comment Matrix – October 18, 2016



Proposed New Alberta Reliability Standard CIP-SUPP-002-AB, *Cyber Security – Supplemental CIP Alberta Reliability Standard Technical Feasibility Exceptions* (“New CIP-SUPP-002-AB”)

Date of Request for Comment: <u>October 18, 2016</u>	Contact: <u>Hameed Zaman</u>
Period of Comment: <u>October 18, 2016</u> through <u>November 3, 2016</u>	Phone: <u>403-267-3715</u>
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Date [yyyy/mm/dd]: <u>2016/11/25</u>	

Listed below is the summary description of changes for the proposed New CIP-SUPP-002-AB. Please refer back to the Consultation Letter under the “Attachments” section to view materials related to the proposed New CIP-SUPP-002-AB. Please place your comments/reasons for position underneath (if any).

1. Alberta Reliability Standard	Market Participant Comments and/or Alternative Proposal
New The AESO is seeking comments from market participants with regard to the following matters: 1. Are there any requirements contained in the proposed New CIP-SUPP-002-AB that are not clearly articulated? If yes, please indicate the specific section of the New CIP-SUPP-002-AB, describe the concern and suggest alternative language. 2. Please provide any additional comments regarding the proposed New CIP-SUPP-002-AB.	<i>Comment # 1:</i> R5 – TransAlta proposes that the ISO notify Responsible Entities at least 90 days in advance of any amendments to the criteria. R6 – In the event that the ISO disapproves a request, TransAlta is of the view that the notice of disapproval should include the reasons for disapproval so that the Responsible Entity is able to rectify any identified concerns. This approach would be consistent with section 5.2.5 of NERC’s <i>Appendix 4D to the Rules of Procedures</i> and provide transparency. R7 – TransAlta requests that the AESO provide clarity on the meaning of “material change”. TransAlta is of the view that if a TFE is disapproved, an appeals process should be part of the standard or the ID to allow a Responsible Entity to address the AESO’s reasons for disapproval. TransAlta believes this process should be specific to TFE requests as the use of the dispute resolution process under ISO Rule 103.2 does not seem appropriate in this context. As significant steps related to a TFE request are identified in the Information Document instead of the rule, TransAlta requests the AESO confirm that the AESO will consult with market participants on future changes to the associated ID. TransAlta agrees with views provided by various market participants at the AESO’s November 16 stakeholder session that a Responsible Entity should not be found non-compliant to a standard during the period there is an associated TFE under review by the AESO. TransAlta encourages the ISO to work with the MSA and provide this assurance to Responsible Entities.

