

Stakeholder Comments

Posted | July 7, 2022

1. AltaLink Management Ltd.
2. ATCO Electric Transmission
3. ENMAX Corporation
4. EPCOR Distribution & Transmission Inc.
5. TransAlta Corporation

Stakeholder Comment Matrix – June 8, 2022

Reliability Standards Discussion Group | Stakeholder Session



Comment period:	June 8, 2022 to June 29, 2022	Contact:	Jenette Yearsley
Comments from:	AltaLink	Phone:	403-703-3201
Date:	2022/06/29	Email:	Jenette.Yearsley@AltaLink.ca

Instructions

1. Please fill out the section above as indicated.
2. Please respond to the questions below and provide your specific comments.
3. **Please submit one completed comment matrix per organization.**
4. **Stakeholder comment matrices will be published on aeso.ca, in their original state.**
5. Email your completed comment matrix to stakeholder.relations@aeso.ca by June 29, 2022.

Request for feedback

The AESO is seeking feedback from interested stakeholders on their perspectives as it relates to: the AESO's proposed approach to the Reliability Standards Discussion Group and Technical Working Groups; and the ARS Program Interim Work Plan. The AESO values stakeholder feedback and invites all interested stakeholders to provide their comments on the following questions. Please be as specific as possible with your responses. Thank you.

Questions	Stakeholder Comments
1. Please comment on RSDG Stakeholder Session hosted on June 8, 2022. Please indicate if you attended in-person or virtually and how you felt the hybrid session went overall. Was there something the AESO could have done to make the session more helpful?	AltaLink is appreciative of the AESO's efforts in this area. AltaLink attended both in-person and virtually. The in-person session was greatly welcomed as it provided enhanced engagement with the AESO and other attendees. The option to attend virtually is also important to allow for greater participation for those unable to attend in person.



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2.	<p>Do you have any feedback on the AESO's proposed approach to the Reliability Standards Discussion Group?</p> <p>Is there any aspect of the AESO's proposed approach that you recommend the AESO amend?</p>	<p>AltaLink agrees with the approach to focus the RSDG on the workplan, process and overall discussion points while leaving detailed standard specific discussions for Reliability Standards Technical Working Groups (TWG). Any consultation that is forwarded to the AUC should include any unresolved issues raised by market participants.</p> <p>In addition, AltaLink suggests the following as improvements:</p> <ul style="list-style-type: none"> • AESO compliance needs to be a more visible, active participant to support the goal of common understanding. • The standing agenda should include a follow-up for items brought forward in the previous meeting or they should be addressed by written meeting minutes. It would be unfortunate if the same issues are raised each meeting without resolution.
3.	<p>Do you have any feedback on the AESO's proposed approach to the Reliability Standards Technical Working Groups?</p> <p>Is there any aspect of the AESO's proposed approach that you recommend the AESO amend?</p>	<p>AltaLink agrees with the approach for the TWG and these need to be started soon for identified standards. AltaLink agrees with the suggestion that TWGs should include all steps from standard development (including the RSAW) through compliance monitoring.</p> <p>AltaLink supports using TWGs for other industry wide technical issues such as BCSI in the cloud. AltaLink also recommends that a steering TWG be established for CIP to ensure the updating and adding of standards are considered at a program level.</p>
4.	<p>Do you have any feedback on the ARS Program Interim Work Plan?</p>	<p>Not currently. AltaLink agrees with the revised structure and format of the Work Plan and the links to the background information. It appreciates the AESO's commitment to hold changes to a minimum and to make the dates more certain.</p>
5.	<p>Are there any recommendations that you would like the AESO to consider when developing its Enhanced ARS Program Work Plan?</p>	<p>AltaLink looks forward to the more complete Work Plan which will show CIP standards and projects further out which will allow for improved planning and funding. Having longer projects that are reasonably certain will help market participants avoid resource complications.</p>

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Comment period:	June 8, 2022 to June 29, 2022	Contact:	Alain Duguay
Comments from:	ATCO Electric Transmission	Phone:	(587) 372-1595
Date:	2022/06/09	Email:	alain.duguay@atco.com

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Questions	Stakeholder Comments
<p>1. Please comment on RSDG Stakeholder Session hosted on June 8, 2022.</p> <p>Please indicate if you attended in-person or virtually and how you felt the hybrid session went overall.</p> <p>Was there something the AESO could have done to make the session more helpful?</p>	<p>ATCO Electric appreciated the open and collaborative forum with AESO and relevant stakeholders to discuss the AESO's ARS Program.</p> <p>ATCO Electric had representatives virtually attend the hybrid session on June 8, 2022. The hybrid format allowed for diverse opportunities to participate both in-person and virtually, which was greatly appreciated. The session was informative and provided a high-level overview of the AESO's ARS Program.</p> <p>Due to the hybrid nature of the session, ATCO found that it was often difficult to hear the questions and comments being made by in-person attendees, while we were attending the session virtually. ATCO prefers to attend in-person when possible but supports a hybrid option as this enables more stakeholders to attend. If possible, it is recommended to</p>



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	<p>improve the audio setup to allow for improved communication and collaboration between in-person and virtual attendees.</p>
<p>2. Do you have any feedback on the AESO's proposed approach to the Reliability Standards Discussion Group? Is there any aspect of the AESO's proposed approach that you recommend the AESO amend?</p>	<p>ATCO Electric supports the proposed approach to the Reliability Standards Discussion Group (RSDG). Regular communication on the ARS Program Workplan and rationale on prioritization of reliability standards under development will be beneficial to market participants so that they can more effectively plan and budget accordingly.</p> <p>ATCO Electric appreciates that AESO will endeavor to accommodate stakeholders requests to propose additions to the RSDG agenda.</p> <p>The Reliability Standards Open Industry Discussion will be valuable to stakeholders and AESO to allow for open communication and collaboration to improve the ARS Compliance Program.</p>
<p>3. Do you have any feedback on the AESO's proposed approach to the Reliability Standards Technical Working Groups? Is there any aspect of the AESO's proposed approach that you recommend the AESO amend?</p>	<p>ATCO Electric supports the proposed creation of technical working groups (TWGs) that will provide an open forum for stakeholders and the AESO to discuss topics related to a specific reliability standard, including development, implementation, and compliance monitoring.</p> <p>ATCO Electric agrees with the proposed approach and potential agenda items for TWG meetings that is targeted to subject matter experts. Incorporating more feedback from stakeholders with regards to proposed reliability standard development, including risk assessment of each requirement, RSAW drafting and supporting information and guidance materials will be beneficial. Education and training about specific reliability standards will provide necessary feedback to ensure market participants are meeting standard requirements. Publishing ID documents or similar, as needed, to provide additional clarity and guidance along with a more robust RFI process is needed to ensure standard requirements are understood and being met.</p>
<p>4. Do you have any feedback on the ARS Program Interim Work Plan?</p>	<p>ATCO Electric appreciates that AESO has provided prioritization and approximate target dates for standards well in advance to ensure market participants can more effectively plan and budget accordingly. As this prioritization list is condensed, it is expected that there will be less sudden changes to prioritization and scheduling going forward, which will improve budgeting and forecasting resource needs.</p> <p>Concerning content, there is a new column marked "Project # ". AE assumes this will be for AESO tracking purposes.</p>

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	<p>AE would like to clarify the types of plans that are in various stages. “New version” designation would refer to a version change such as AB-03 toAB-04. Standards that are classified as “Amendment “would be a revision to content without any versioning. Perhaps adding definitions of the types in a footnote may be helpful.</p> <p>ATCO Electric would like the AESO to consider adding a section for ISO Rules to the work plan or re-establishing the ISO Work Plan document.</p> <p>AE would like to understand the AESO’s plan for revising the Work Plan. AE would suggest that updates be provided to market participants on a quarterly basis.</p> <p>AE would like the AESO to provide access to historical versions of published Work Plans.</p>
5.	<p>Are there any recommendations that you would like the AESO to consider when developing its Enhanced ARS Program Work Plan?</p> <p>Improvements to the RFI process and RSAW development timeline should be considered.</p> <ol style="list-style-type: none"> 1. The Request for Information (RFI) process should be revised to provide more clarity to the standard, including interpretation and application, as often the necessary clarity is not currently provided. In addition, the response time from the current process can be slow resulting in unnecessary delay and possible improper application of standard requirements. They should be managed in a more timely manner. 2. Reliability Standard Audit Worksheet (RSAW) development and issue should be considered earlier in standard development phase of the ARS Program Lifecycle, to ensure understanding of evidence expectations. This will reduce rework and potential penalties that could result from suspected contraventions for Market Participants, if expected level of compliance was not achieved.

Thank you for your input. Please email your completed matrix to: stakeholder.relations@aeso.ca

Stakeholder Comment Matrix – June 8, 2022

Reliability Standards Discussion Group | Stakeholder Session



Comment period:	June 8, 2022 to June 29, 2022	Contact:	Tracy Coutts
Comments from:	ENMAX Corporation	Phone:	403-514-2756
Date:	2022/06/29	Email:	tcoutts@enmax.com

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1. Please comment on RSDG Stakeholder Session hosted on June 8, 2022. Please indicate if you attended in-person or virtually and how you felt the hybrid session went overall. Was there something the AESO could have done to make the session more helpful?	<ul style="list-style-type: none">• ENMAX attended in person.• Overall, the hybrid session went very well. We would ask that the AESO should consider displaying those attending virtually in the in-person session.
2. Do you have any feedback on the AESO’s proposed approach to the Reliability Standards Discussion Group?	<ul style="list-style-type: none">• ENMAX supports and recommends the Reliability Standards Discussion Group (“RSDG”) occur at a minimum of 3-month intervals, preferably even more frequently.



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<p>Is there any aspect of the AESO's proposed approach that you recommend the AESO amend?</p>	<ul style="list-style-type: none"> The AESO stated that "Detailed content discussions on specific reliability standards" is out of scope of the RSDG sessions. The AESO also stated under the "Reliability Standards Open Industry Discussion • • To provide an opportunity for stakeholders and the AESO to discuss specific or proposed reliability standards and provide feedback.". ENMAX understands that detailed and/or technical discussions would likely occur within the Technical Working Groups (TWGs), however, ENMAX encourages the AESO to plan for some level of detailed content discussions during the RSDG and ensure that the correct subject matter experts attend the RSDG. This is particularly important for proposed ARS (under development) which would allow for technical discussions on the requirements prior to stakeholder consultation. Allowing for technical discussions during the development stage would also better-align participants with compliance expectations prior to the ARS coming into effect. The AESO also stated that enforcement related topics are out of scope. ENMAX recommends and encourages the AESO's compliance team and the MSA to participate in both the RSDG and TWG discussions. This is particularly important to ensure that all parties are aligned with compliance expectations.
<p>3. Do you have any feedback on the AESO's proposed approach to the Reliability Standards Technical Working Groups? Is there any aspect of the AESO's proposed approach that you recommend the AESO amend?</p>	<ul style="list-style-type: none"> ENMAX supports the AESO's recommendation to include CIP-012-AB-1 (implementation), and IRO-010-4 (development) for the initial TWG sessions. ENMAX would also recommend that the AESO schedule TWG's for the new COM standards, as this would be beneficial to market participants with the new and revised requirements. ENMAX also recommends that the AESO schedule TWG sessions on ARS that are already in effect, for example, PRC-005, FAC-008, PRC-019. Given that many of the questions or concerns with the above ARS have likely been addressed, ENMAX suggests that the AESO combine the ARS into one session, which can focus on specific areas within the ARS. As noted above in the RSDG comment section, ENMAX recommends that the AESO's compliance team participate in the TWGs. ENMAX also believes RSAWs should be developed in the TWGs. As ENMAX noted in previous consultations, ENMAX strongly recommends the AESO provide increased technical support during the <u>implementation</u> stage of an ARS. This

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	<p>can likely be addressed through the TWGs, however, participants should also have the ability to collaborate with the AESO SME's outside of the TWG (if required).</p> <ul style="list-style-type: none"> ENMAX is interested in scheduling TWGs that are not focused on a single ARS. An example is a group to discuss cloud storage and uses.
4.	Do you have any feedback on the ARS Program Interim Work Plan?
5.	<p>Are there any recommendations that you would like the AESO to consider when developing its Enhanced ARS Program Work Plan?</p> <p>ENMAX recommended breaking down the Workplan's Applicability section to clearly describe ISO, TFO, GFO, etc.</p>

Thank you for your input. Please email your completed matrix to: stakeholder.relations@ieso.ca

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Comment period:	June 8, 2022 to June 29, 2022	Contact:	Rajveen Gill
Comments from:	EPCOR Distribution & Transmission Inc.	Phone:	780-412-3435
Date:	2022/06/29	Email:	rgill@epcor.com

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1. Please comment on RSDG Stakeholder Session hosted on June 8, 2022. Please indicate if you attended in-person or virtually and how you felt the hybrid session went overall. Was there something the AESO could have done to make the session more helpful?	EDTI appreciates the AESO hosting the hybrid session, allowing for in-person and virtual attendance. EDTI utilized both options and preferred the in-person option as it allowed for easier interaction with other participants.
2. Do you have any feedback on the AESO's proposed approach to the Reliability Standards Discussion Group?	EDTI supports the AESO's approach to have more detailed discussions in the TWGs and high-level updates in the RSDG. EDTI requests the AESO consider the use of TWGs for matters outside of specific ARS, such as BSCI in the cloud and ISO Rules.



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<p>Is there any aspect of the AESO's proposed approach that you recommend the AESO amend?</p>	<p>The RFI process is currently an impractical tool to assist market participants with ARS implementation and/or compliance due to the long and unknown turnaround times. EDTI requests the AESO revise the RFI process as a part of the ARS Program Enhancement with regular updates on queue times and trends of RFIs at the RSDG.</p>
<p>3. Do you have any feedback on the AESO's proposed approach to the Reliability Standards Technical Working Groups?</p> <p>Is there any aspect of the AESO's proposed approach that you recommend the AESO amend?</p>	<p>EDTI requests the AESO consider enforcement in scope for situations where a MPs mitigation plan has been approved by the MSA but not the AESO.</p>
<p>4. Do you have any feedback on the ARS Program Interim Work Plan?</p>	<p>Not at this time.</p>
<p>5. Are there any recommendations that you would like the AESO to consider when developing its Enhanced ARS Program Work Plan?</p>	<p>EDTI requests:</p> <ul style="list-style-type: none"> • The AESO publish a list of all current NERC standards with planned ARS adoption status information to provide Market Participants with clarity on where Alberta is in the adoption of NERC standards. • The AESO provide visibility on movement of ARS by including original planned dates for program activities with information on why dates have changed. • The AESO provide a work plan for ISO Rules.

Thank you for your input. Please email your completed matrix to: stakeholder.relations@aesocanada.com

Stakeholder Comment Matrix – June 8, 2022

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Comment period:	June 8, 2022 to June 29, 2022	Contact:	Ashley Scheelar
Comments from:	TransAlta	Phone:	403-267-7916
Date:	2022-06-29	Email:	ashley_scheelar@transalta.com

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2. Do you have any feedback on the AESO's proposed approach to the Reliability Standards Discussion Group?	To emphasize few points that were noted in the meeting: <ul style="list-style-type: none">- the AESO Compliance Team should be incorporated into all RSDG meetings, if possible



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	Is there any aspect of the AESO's proposed approach that you recommend the AESO amend?	<ul style="list-style-type: none"> - There would be benefit in having a similar meeting arrangement to include ISO Rules discussion or have the flexibility to include ISO Rules in the RSDG
3.	<p>Do you have any feedback on the AESO's proposed approach to the Reliability Standards Technical Working Groups?</p> <p>Is there any aspect of the AESO's proposed approach that you recommend the AESO amend?</p>	<p>To emphasize few points that were noted in the meeting:</p> <ul style="list-style-type: none"> - As suggested by another participant, allowing TWG by topic versus strictly by standard would be good - Please consider incorporating the RSAW development into the TWG
4.	Do you have any feedback on the ARS Program Interim Work Plan?	We appreciate that a modified work plan was started and the general format is good.
5.	Are there any recommendations that you would like the AESO to consider when developing its Enhanced ARS Program Work Plan?	We would like to echo the suggestion from an attendee at the June 8 session about including in the work plan those future NERC standards (even if AESO hasn't started on these standards yet).

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