

August 26, 2022

To: Market Participants, Market Surveillance Administrator, and other interested parties (“Stakeholders”)

Re: **Comments on Consultation Letter on the following:**

- 1) Proposed new COM-001-AB-3, *Communications* (“COM-001-AB-3”);
- 2) Proposed new COM-002-AB-4, *Operating Personnel Communication Protocols* (“COM-002-AB-4”);
- 3) Proposed retirement of existing COM-001-AB1-1.1, *Communications* (“COM-001-AB1-1.1”);
- 4) Proposed retirement of existing COM-002-AB1-2a, *Operating Personnel Communication Protocols* (“COM-002-AB1-2a”); and
- 5) Proposed amended Section 502.4 of the ISO rules, *Automated Dispatch and Messaging System and Voice Communication System Requirements* (“Section 502.4”).

(collectively referred to as the “Communication ISO Rule and Reliability Standards”)

Pursuant to Alberta Utilities Commission Rule 017, *Procedures and Process for Development of ISO Rules and Filing of ISO Rules with the Alberta Utilities Commission*, written comments received from Stakeholders in response to the Alberta Electric System Operator’s (“AESO”) July 27, 2022 Consultation Letter regarding the Communication ISO Rule and Reliability Standards have been posted on the AESO website.

Comments were received from the following Stakeholders:

1. AltaLink;
2. ATCO Electric Ltd.;
3. Capital Power;
4. ENMAX Corporation;
5. EPCOR Distribution & Transmission Inc.;
6. Heartland Generation Ltd.;
7. TC Energy; and
8. TransAlta.

Thank you to all Stakeholders who participated in this consultation. All written comments received will be considered in the finalization of the Communication ISO Rule and Reliability Standards.

If you have any questions, please submit them to [ars\\_comments@aesoc.ca](mailto:ars_comments@aesoc.ca).

Sincerely,

*Jackie Gow*

Jackie Gow  
Manager ISO Rules and Alberta Reliability Standards  
Email: [ars\\_comments@aesoc.ca](mailto:ars_comments@aesoc.ca)

Stakeholder Comment Matrix on the following:

- 1) Proposed new COM-001-AB-3, *Communications* (“new COM-001-AB-3”);
- 2) Proposed new COM-002-AB-4, *Operating Personnel Communication Protocols* (“new COM-002-AB-4”);
- 3) Proposed retirement of existing COM-001-AB1-1.1, *Communications* (“existing COM-001-AB1-1.1”);
- 4) Proposed retirement of existing COM-002-AB1-2a, *Operating Personnel Communication Protocols* (“existing COM-002-AB1-2a”); and
- 5) Proposed amended Section 502.4 of the ISO rules, *Automated Dispatch and Messaging System and Voice Communication System Requirements* (“Section 502.4”).



(collectively referred to as the “Communication ISO Rule and Reliability Standards”)

<p>Date of Request for Comment: <u>July 27, 2022</u></p> <p>Period of Comment: <u>July 27, 2022</u> through <u>August 19, 2022</u></p> <p>Comments From: <u>AltaLink</u></p> <p>Date: <u>August 19, 2022</u></p>	<p>Contact: <u>Jenette Yearsley</u></p> <p>Phone: <u>(403) 703-3201</u></p> <p>Email: <u>Jenette.Yearsley@AltaLink.ca</u></p>
--	---

Instructions:

1. Please fill out the section above as indicated.
2. Please refer back to the Consultation Letter under the “Consultation Letter Materials” section to view materials related to the Communication ISO Rule and Reliability Standards.
3. Please respond to the questions below and provide your specific comments, proposed revisions, and reasons for your position underneath (if any). Blank boxes will be interpreted as favourable comments.
4. Please be advised that general comments do not give the AESO any specific issue to consider and address, and results in a general response.

**The AESO is seeking comments from Stakeholders on the Communication ISO Rule and Reliability Standards with regard to the following matters:**

AESO Questions to Stakeholders: Proposed New COM-001-AB-3	Stakeholder Comments and/or Alternative Proposal
<p>1. Are there any requirements contained in the proposed new COM-001-AB-3 that are not clearly articulated? If yes, please indicate the specific section of the proposed new COM-001-AB-3, describe the concern, and suggest</p>	<p>R9 The Responsible Entities must test each backup voice communication capability, as specified in Appendix 1, Appendix 2, and Appendix 3, at least once each month. If the test is unsuccessful, the Responsible Entity must initiate action to repair or designate a temporary</p>

Stakeholder Comment Matrix on the following:

- 1) Proposed new COM-001-AB-3, *Communications* (“new COM-001-AB-3”);
- 2) Proposed new COM-002-AB-4, *Operating Personnel Communication Protocols* (“new COM-002-AB-4”);
- 3) Proposed retirement of existing COM-001-AB1-1.1, *Communications* (“existing COM-001-AB1-1.1”);
- 4) Proposed retirement of existing COM-002-AB1-2a, *Operating Personnel Communication Protocols* (“existing COM-002-AB1-2a”); and
- 5) Proposed amended Section 502.4 of the ISO rules, *Automated Dispatch and Messaging System and Voice Communication System Requirements* (“Section 502.4”).

(collectively referred to as the “Communication ISO Rule and Reliability Standards”)



AESO Questions to Stakeholders: Proposed New COM-001-AB-3	Stakeholder Comments and/or Alternative Proposal
<p>alternative language.</p>	<p>replacement backup voice communication capability within 2 hours of the unsuccessful test.</p> <ol style="list-style-type: none"> <li>1. AltaLink requires further discussion/meeting with the AESO to clarify the intent of the requirement R9 in particular, but not limited to, the utility orderwire service. Is it the intent for testing that every entity confirm backup voice communication with every other interconnected parties? There is a concern regarding the additional cost and workload.</li> <li>2. AltaLink’s internal telephone system is used to provide utility orderwire service &amp; backup voice communication capability. The system is used daily for normal day-to-day and emergency response services. As a result of the daily use and more inherent management functionality of the utility orderwire service, AltaLink believes it’s not necessary to do monthly testing for backup voice communication capability with entities who are using utility orderwire service. Instead, AltaLink suggests excluding utility orderwire service from R9 and adding the following subrequirement R9.1:                     <p style="margin-left: 40px;">R9.1 The Responsible Entities, who are using utility orderwire service for backup voice communication capability, must test each backup voice communication capability at least once per quarter.</p> </li> </ol>
<p>2. Do you have any additional comments regarding the proposed new COM-001-AB-3? If yes, please specify.</p>	<p>AltaLink requires the AESO to provide the RSAW before forwarding the proposed standard to Alberta Utilities Commission.</p>
<p>3. Please provide any comments, concerns, or suggested alternative language on the proposed amended information document, ID #2012-001RS,</p>	<p>3.4 Testing Procedure (R9): In accordance with the testing requirement set out in requirement R9, the AESO will determine a schedule to test all backup voice communication capability with the AESO. When</p>

Stakeholder Comment Matrix on the following:

- 1) Proposed new COM-001-AB-3, *Communications* (“new COM-001-AB-3”);
- 2) Proposed new COM-002-AB-4, *Operating Personnel Communication Protocols* (“new COM-002-AB-4”);
- 3) Proposed retirement of existing COM-001-AB1-1.1, *Communications* (“existing COM-001-AB1-1.1”);
- 4) Proposed retirement of existing COM-002-AB1-2a, *Operating Personnel Communication Protocols* (“existing COM-002-AB1-2a”); and
- 5) Proposed amended Section 502.4 of the ISO rules, *Automated Dispatch and Messaging System and Voice Communication System Requirements* (“Section 502.4”).

(collectively referred to as the “Communication ISO Rule and Reliability Standards”)



AESO Questions to Stakeholders: Proposed New COM-001-AB-3	Stakeholder Comments and/or Alternative Proposal
<i>Communications.</i>	<p>available, this will be provided in Appendix 1 of this information document. The AESO may be required to postpone testing to alternative days if conditions do not allow for testing on the scheduled dates. In such situations, the AESO will advise each operator of the change as soon as practicable.</p> <ol style="list-style-type: none"> <li>1. AltaLink requires further clarification of the above Testing Procedure (R9) and has a concern regarding additional cost and workload due to the Procedure.</li> <li>2. AltaLink currently performs scheduled test calls to the AESO using utility orderwire service. AltaLink believes this is adequate to test the backup voice communication capability with the AESO, and does not believe additional scheduling is necessary.</li> </ol>
4. Do you agree that the proposed new COM-001-AB-3 is not technically deficient? If not, why.	Agreed.
5. Do you agree that the proposed new COM-001-AB-3 supports the public interest? If not, why?	Agreed.
6. If approved, the AESO will propose an effective date of 3 calendar quarters after Commission approval. Do you agree? If not, why not?	Agreed.

AESO Questions to Stakeholders: Proposed New COM-002-AB-4	Stakeholder Comments and/or Alternative Proposal
---	--

Stakeholder Comment Matrix on the following:

- 1) Proposed new COM-001-AB-3, *Communications* (“new COM-001-AB-3”);
- 2) Proposed new COM-002-AB-4, *Operating Personnel Communication Protocols* (“new COM-002-AB-4”);
- 3) Proposed retirement of existing COM-001-AB1-1.1, *Communications* (“existing COM-001-AB1-1.1”);
- 4) Proposed retirement of existing COM-002-AB1-2a, *Operating Personnel Communication Protocols* (“existing COM-002-AB1-2a”); and
- 5) Proposed amended Section 502.4 of the ISO rules, *Automated Dispatch and Messaging System and Voice Communication System Requirements* (“Section 502.4”).

(collectively referred to as the “Communication ISO Rule and Reliability Standards”)



AESO Questions to Stakeholders: Proposed New COM-002-AB-4	Stakeholder Comments and/or Alternative Proposal
1. Are there any requirements contained in the proposed new COM-002-AB-4 that are not clearly articulated? If yes, please indicate the specific section of the proposed new COM-002-AB-4, describe the concern and suggest alternative language.	None.
2. Do you have any additional comments regarding the proposed new COM-002-AB-4? If yes, please specify.	None.
3. Please provide any comments, concerns, or suggested alternative language on the proposed new information document, ID #2022-001, <i>Operating Personnel Communication Protocols</i> .	None.
4. Do you agree that the proposed new COM-002-AB-4 is not technically deficient? If not, why.	Agreed.
5. Do you agree that the proposed new COM-002-AB-4 supports the public interest? If not, why?	Agreed.
6. If approved, the AESO will propose an effective date of 3 calendar quarters after Commission approval. Do you agree? If not, why not?	Agreed.

AESO Questions to Stakeholders: Proposed Retirement of Existing COM-001-AB1-1.1	Stakeholder Comments and/or Alternative Proposal
---	--

Stakeholder Comment Matrix on the following:

- 1) Proposed new COM-001-AB-3, *Communications* (“new COM-001-AB-3”);
- 2) Proposed new COM-002-AB-4, *Operating Personnel Communication Protocols* (“new COM-002-AB-4”);
- 3) Proposed retirement of existing COM-001-AB1-1.1, *Communications* (“existing COM-001-AB1-1.1”);
- 4) Proposed retirement of existing COM-002-AB1-2a, *Operating Personnel Communication Protocols* (“existing COM-002-AB1-2a”); and
- 5) Proposed amended Section 502.4 of the ISO rules, *Automated Dispatch and Messaging System and Voice Communication System Requirements* (“Section 502.4”).

(collectively referred to as the “Communication ISO Rule and Reliability Standards”)



AESO Questions to Stakeholders: Proposed Retirement of Existing COM-001-AB1-1.1	Stakeholder Comments and/or Alternative Proposal
1. Do you have any concerns with the proposed retirement of the existing COM-001-AB1-1.1? If yes, please specify.	None.

AESO Questions to Stakeholders: Proposed Retirement of Existing COM-002-AB1-2a	Stakeholder Comments and/or Alternative Proposal
1. Do you have any concerns with the proposed retirement of the existing COM-002-AB1-2a? If yes, please specify.	None.

AESO Questions to Stakeholders: Proposed Amended Section 502.4	Stakeholder Comments and/or Alternative Proposal
1. Do you understand and agree with the objective or purpose of the proposed amended Section 502.4 and whether, in your view, the proposed amended Section 502.4 meets the objective or purpose? If not, why.	Yes.
2. Do you agree that the proposed amended Section 502.4 is not technically deficient? If not, why.	Agreed.
3. Do you agree with the proposed amended Section 502.4, taken together with all ISO rules and reliability standards, supports a fair, efficient, and openly	Agreed.

Stakeholder Comment Matrix on the following:

- 1) Proposed new COM-001-AB-3, *Communications* (“new COM-001-AB-3”);
- 2) Proposed new COM-002-AB-4, *Operating Personnel Communication Protocols* (“new COM-002-AB-4”);
- 3) Proposed retirement of existing COM-001-AB1-1.1, *Communications* (“existing COM-001-AB1-1.1”);
- 4) Proposed retirement of existing COM-002-AB1-2a, *Operating Personnel Communication Protocols* (“existing COM-002-AB1-2a”); and
- 5) Proposed amended Section 502.4 of the ISO rules, *Automated Dispatch and Messaging System and Voice Communication System Requirements* (“Section 502.4”).

(collectively referred to as the “Communication ISO Rule and Reliability Standards”)



AESO Questions to Stakeholders: Proposed Amended Section 502.4	Stakeholder Comments and/or Alternative Proposal
competitive market? If not, why?	
4. Do you agree that the proposed amended Section 502.4 supports the public interest? If not, why?	Agreed.
5. If approved, the AESO will propose an effective date of 3 calendar quarters after Commission approval. Do you agree? If not, why not?	Agreed.
6. Any additional comments regarding the proposed amended Section 502.4?	None.
7. Please provide any comments, concerns, or suggested alternative language on the proposed amended ID, #2017-006R, <i>Automated Dispatch and Messaging System Requirements</i> .	None.

Stakeholder Comment Matrix on the following:

- 1) Proposed new COM-001-AB-3, *Communications* (“new COM-001-AB-3”);
- 2) Proposed new COM-002-AB-4, *Operating Personnel Communication Protocols* (“new COM-002-AB-4”);
- 3) Proposed retirement of existing COM-001-AB1-1.1, *Communications* (“existing COM-001-AB1-1.1”);
- 4) Proposed retirement of existing COM-002-AB1-2a, *Operating Personnel Communication Protocols* (“existing COM-002-AB1-2a”); and
- 5) Proposed amended Section 502.4 of the ISO rules, *Automated Dispatch and Messaging System and Voice Communication System Requirements* (“Section 502.4”).

(collectively referred to as the “Communication ISO Rule and Reliability Standards”)



Date of Request for Comment:	July 27, 2022	Contact:	Alain Duguay
Period of Comment:	July 27, 2022 through August 19, 2022	Phone:	587-372-1595
Comments From:	ATCO Eletric Ltd	Email:	Alain.Duguay@ATCO.com
Date:	August 18, 2022		

Instructions:

1. Please fill out the section above as indicated
2. Please refer back to the Consultation Letter under the “Consultation Letter Materials” section to view materials related to the Communication ISO Rule and Reliability Standards.
3. Please respond to the questions below and provide your specific comments, proposed revisions, and reasons for your position underneath (if any). Blank boxes will be interpreted as favourable comments.
4. Please be advised that general comments do not give the AESO any specific issue to consider and address, and results in a general response.

**The AESO is seeking comments from Stakeholders on the Communication ISO Rule and Reliability Standards with regard to the following matters:**

AESO Questions to Stakeholders: Proposed New COM-001-AB-3	Stakeholder Comments and/or Alternative Proposal
1. Are there any requirements contained in the proposed new COM-001-AB-3 that are not clearly articulated? If yes, please indicate the specific section of the proposed new COM-001-AB-3, describe the concern, and suggest	R9. Testing Back up communications . AE suggests that monthly testing be scheduled early to ensure compliance to requirement.  R13. AE would like to request guidance on expectations on the required testing of voice communications between the control room and field



Stakeholder Comment Matrix on the following:

- 1) Proposed new COM-001-AB-3, *Communications* (“new COM-001-AB-3”);
- 2) Proposed new COM-002-AB-4, *Operating Personnel Communication Protocols* (“new COM-002-AB-4”);
- 3) Proposed retirement of existing COM-001-AB1-1.1, *Communications* (“existing COM-001-AB1-1.1”);
- 4) Proposed retirement of existing COM-002-AB1-2a, *Operating Personnel Communication Protocols* (“existing COM-002-AB1-2a”); and
- 5) Proposed amended Section 502.4 of the ISO rules, *Automated Dispatch and Messaging System and Voice Communication System Requirements* (“Section 502.4”).

(collectively referred to as the “Communication ISO Rule and Reliability Standards”)



AESO Questions to Stakeholders: Proposed New COM-001-AB-3	Stakeholder Comments and/or Alternative Proposal
<p>alternative language.</p>	<p>operations as at times this may be mobile radios and / or cell phone communication devices .</p> <p>R14 MP use of a satellite phone for back up communiactions. As the system in question is subject to the AESO approval, in the event that the market participant is using another sat system , will there be a timeline to allow the participant to comply ? Also, AEL is requesting clarification on which satellite providers are approved to be used in Alberta .</p> <p>R15 AEL is requesting clarification on backup power generation evidence. Will the Market Participants be expected to demonstrate how 8 hours of backup power is maintained at all time?</p>
<p>2. Do you have any additional comments regarding the proposed new COM-001-AB-3? If yes, please specify.</p>	<p>AEL is requesting that “Voice Communication Capability” be defined in the Consolidated Authoritative Document Glossary.</p> <p>As much of the document is now referencing a “ Control Room “ , AEL is requesting that “Control Room” be defined in the Consolidated Authoritative Document Glossary to describe how it differs from a “Control Center”.</p> <p>AEL is requesting clarification on R12 &amp; 13 regarding what AESO defines as “Internal Primary Voice Communication Capabilities”</p>
<p>3. Please provide any comments, concerns, or suggested alternative language on the proposed amended information document, ID #2012-001RS, <i>Communications</i>.</p>	<p>AEL would like clarification on the following statement within section 2.1 (c), what is meant by the terminology “Generally remote” regarding the transmission facility or the electric distribution system.</p> <p>AEL would like clarification on section 2.3. For each operator that is required to have a utility orderwire system as its only backup voice communication, as set out in Appendix 1, Appendix 2, and Appendix 3 of COM-001-AB-3, it is expected to be near the control room primary and backup voice</p>

Stakeholder Comment Matrix on the following:

- 1) Proposed new COM-001-AB-3, *Communications* (“new COM-001-AB-3”);
- 2) Proposed new COM-002-AB-4, *Operating Personnel Communication Protocols* (“new COM-002-AB-4”);
- 3) Proposed retirement of existing COM-001-AB1-1.1, *Communications* (“existing COM-001-AB1-1.1”);
- 4) Proposed retirement of existing COM-002-AB1-2a, *Operating Personnel Communication Protocols* (“existing COM-002-AB1-2a”); and
- 5) Proposed amended Section 502.4 of the ISO rules, *Automated Dispatch and Messaging System and Voice Communication System Requirements* (“Section 502.4”).

(collectively referred to as the “Communication ISO Rule and Reliability Standards”)



AESO Questions to Stakeholders: Proposed New COM-001-AB-3	Stakeholder Comments and/or Alternative Proposal
	communication system at all times. Please define the term “near” and what evidence is required to demonstrate compliance to be “near”.
4. Do you agree that the proposed new COM-001-AB-3 is not technically deficient? If not, why.	Yes
5. Do you agree that the proposed new COM-001-AB-3 supports the public interest? If not, why?	Yes
6. If approved, the AESO will propose an effective date of 3 calendar quarters after Commission approval. Do you agree? If not, why not?	AE would recommend that the effective date is set to 4 calendar quarters after Commission approval to allow sufficient time for the MP to develop and implement compliance needs .

AESO Questions to Stakeholders: Proposed New COM-002-AB-4	Stakeholder Comments and/or Alternative Proposal
1. Are there any requirements contained in the proposed new COM-002-AB-4 that are not clearly articulated? If yes, please indicate the specific section of the proposed new COM-002-AB-4, describe the concern and suggest alternative language.	No
2. Do you have any additional comments regarding the proposed new COM-002-AB-4? If yes, please specify.	NA

Stakeholder Comment Matrix on the following:

- 1) Proposed new COM-001-AB-3, *Communications* (“new COM-001-AB-3”);
- 2) Proposed new COM-002-AB-4, *Operating Personnel Communication Protocols* (“new COM-002-AB-4”);
- 3) Proposed retirement of existing COM-001-AB1-1.1, *Communications* (“existing COM-001-AB1-1.1”);
- 4) Proposed retirement of existing COM-002-AB1-2a, *Operating Personnel Communication Protocols* (“existing COM-002-AB1-2a”); and
- 5) Proposed amended Section 502.4 of the ISO rules, *Automated Dispatch and Messaging System and Voice Communication System Requirements* (“Section 502.4”).

(collectively referred to as the “Communication ISO Rule and Reliability Standards”)



AESO Questions to Stakeholders: Proposed New COM-002-AB-4	Stakeholder Comments and/or Alternative Proposal
3. Please provide any comments, concerns, or suggested alternative language on the proposed new information document, ID #2022-001, <i>Operating Personnel Communication Protocols</i> .	NA
4. Do you agree that the proposed new COM-002-AB-4 is not technically deficient? If not, why.	Yes
5. Do you agree that the proposed new COM-002-AB-4 supports the public interest? If not, why?	Yes
6. If approved, the AESO will propose an effective date of 3 calendar quarters after Commission approval. Do you agree? If not, why not?	As above, AE requests that the effective date is 4 calendar quarters after Commission approval

AESO Questions to Stakeholders: Proposed Retirement of Existing COM-001-AB1-1.1	Stakeholder Comments and/or Alternative Proposal
1. Do you have any concerns with the proposed retirement of the existing COM-001-AB1-1.1? If yes, please specify.	NO

AESO Questions to Stakeholders: Proposed Retirement of Existing COM-002-AB1-2a	Stakeholder Comments and/or Alternative Proposal
--	--

Stakeholder Comment Matrix on the following:

- 1) Proposed new COM-001-AB-3, *Communications* (“new COM-001-AB-3”);
- 2) Proposed new COM-002-AB-4, *Operating Personnel Communication Protocols* (“new COM-002-AB-4”);
- 3) Proposed retirement of existing COM-001-AB1-1.1, *Communications* (“existing COM-001-AB1-1.1”);
- 4) Proposed retirement of existing COM-002-AB1-2a, *Operating Personnel Communication Protocols* (“existing COM-002-AB1-2a”); and
- 5) Proposed amended Section 502.4 of the ISO rules, *Automated Dispatch and Messaging System and Voice Communication System Requirements* (“Section 502.4”).

(collectively referred to as the “Communication ISO Rule and Reliability Standards”)



1. Do you have any concerns with the proposed retirement of the existing COM-002-AB1-2a? If yes, please specify.	NO
--	----

AESO Questions to Stakeholders: Proposed Amended Section 502.4	Stakeholder Comments and/or Alternative Proposal
1. Do you understand and agree with the objective or purpose of the proposed amended Section 502.4 and whether, in your view, the proposed amended Section 502.4 meets the objective or purpose? If not, why.	Yes
2. Do you agree that the proposed amended Section 502.4 is not technically deficient? If not, why.	Yes
3. Do you agree with the proposed amended Section 502.4, taken together with all ISO rules and reliability standards, supports a fair, efficient, and openly competitive market? If not, why?	Yes
4. Do you agree that the proposed amended Section 502.4 supports the public interest? If not, why?	Yes
5. If approved, the AESO will propose an effective date of 3 calendar quarters after Commission approval. Do you agree? If not, why not?	Suggested 4 calendar quarter as above
6. Any additional comments regarding the proposed amended Section 502.4?	NA

Stakeholder Comment Matrix on the following:

- 1) Proposed new COM-001-AB-3, *Communications* (“new COM-001-AB-3”);
- 2) Proposed new COM-002-AB-4, *Operating Personnel Communication Protocols* (“new COM-002-AB-4”);
- 3) Proposed retirement of existing COM-001-AB1-1.1, *Communications* (“existing COM-001-AB1-1.1”);
- 4) Proposed retirement of existing COM-002-AB1-2a, *Operating Personnel Communication Protocols* (“existing COM-002-AB1-2a”); and
- 5) Proposed amended Section 502.4 of the ISO rules, *Automated Dispatch and Messaging System and Voice Communication System Requirements* (“Section 502.4”).

(collectively referred to as the “Communication ISO Rule and Reliability Standards”)



AESO Questions to Stakeholders: Proposed Amended Section 502.4	Stakeholder Comments and/or Alternative Proposal
7 Please provide any comments, concerns, or suggested alternative language on the proposed amended ID, #2017-006R, <i>Automated Dispatch and Messaging System Requirements</i> .	NA

Stakeholder Comment Matrix on the following:

- 1) Proposed new COM-001-AB-3, *Communications* (“new COM-001-AB-3”);
- 2) Proposed new COM-002-AB-4, *Operating Personnel Communication Protocols* (“new COM-002-AB-4”);
- 3) Proposed retirement of existing COM-001-AB1-1.1, *Communications* (“existing COM-001-AB1-1.1”);
- 4) Proposed retirement of existing COM-002-AB1-2a, *Operating Personnel Communication Protocols* (“existing COM-002-AB1-2a”); and
- 5) Proposed amended Section 502.4 of the ISO rules, *Automated Dispatch and Messaging System and Voice Communication System Requirements* (“Section 502.4”).



(collectively referred to as the “Communication ISO Rule and Reliability Standards”)

Date of Request for Comment:	July 27, 2022	Contact:	Shannon Ferdinand
Period of Comment:	July 27, 2022 through August 19, 2022	Phone:	7806916735
Comments From:	Capital Power	Email:	sferdinand@capitalpower.com
Date:	[2022/08/19]		

Instructions:

1. Please fill out the section above as indicated.
2. Please refer back to the Consultation Letter under the “Consultation Letter Materials” section to view materials related to the Communication ISO Rule and Reliability Standards.
3. Please respond to the questions below and provide your specific comments, proposed revisions, and reasons for your position underneath (if any). Blank boxes will be interpreted as favorable comments.
4. Please be advised that general comments do not give the AESO any specific issue to consider and address, and results in a general response.

**The AESO is seeking comments from Stakeholders on the Communication ISO Rule and Reliability Standards with regard to the following matters:**

AESO Questions to Stakeholders: Proposed New COM-001-AB-3	Stakeholder Comments and/or Alternative Proposal
1. Are there any requirements contained in the proposed new COM-001-AB-3 that are not clearly articulated? If yes, please indicate the specific section of the proposed	1. The AESO’s repetition of the applicable entities in each requirement adds bulk to the standard and makes it more difficult to read and interpret. i.e., AESO's version of R8(b) reads: "the operator of a transmission facility that is directly connected to its generating unit or aggregated generating facility". NERC's version reads: "its Transmission

Stakeholder Comment Matrix on the following:

- 1) Proposed new COM-001-AB-3, *Communications* (“new COM-001-AB-3”);
- 2) Proposed new COM-002-AB-4, *Operating Personnel Communication Protocols* (“new COM-002-AB-4”);
- 3) Proposed retirement of existing COM-001-AB1-1.1, *Communications* (“existing COM-001-AB1-1.1”);
- 4) Proposed retirement of existing COM-002-AB1-2a, *Operating Personnel Communication Protocols* (“existing COM-002-AB1-2a”); and
- 5) Proposed amended Section 502.4 of the ISO rules, *Automated Dispatch and Messaging System and Voice Communication System Requirements* (“Section 502.4”).

(collectively referred to as the “Communication ISO Rule and Reliability Standards”)



AESO Questions to Stakeholders: Proposed New COM-001-AB-3	Stakeholder Comments and/or Alternative Proposal
<p>new COM-001-AB-3, describe the concern, and suggest alternative language.</p>	<p>Operator” and offers the reader a much clearer requirement while still achieving the same reliability objective</p> <ol style="list-style-type: none"> <li>2. The AESO’s proposed COM-001-AB-3 introduces a number of new undefined terms that are critical to the standard (i.e., control room, direct access, public telephone network etc.). Though the AESO offers context for most of these terms in the accompanying ID, Capital Power believes that such terms should be clearly defined in the AESO Consolidated Glossary.</li> <li>3. COM-001-AB-3, R3.A1(b), R7.A1(b), R8.A1(b) introduce the requirement that primary voice communication capability shall not be degraded by any other communication functionality or any other data transfer activities if there is any shared equipment. However, the associated measures which outline the evidence required to demonstrate compliance with these requirements are silent on how an entity may demonstrate compliance with these requirements. The associated proposed ID does offer context for these requirements but is too subjective for a Reliability Standard which entities can expect to be audited on. Per comments in question 2, Capital Power is hesitant to support any RS without insight into the corresponding RSAW.</li> </ol>
<p>2. Do you have any additional comments regarding the proposed new COM-001-AB-3? If yes, please specify.</p>	<p>Currently, Capital Power does not support the proposed COM-001-AB-3 standard and offers the following for AESO’s consideration:</p> <ol style="list-style-type: none"> <li>1. <b>Misalignment with NERC</b> – The current proposed COM-001-AB-3 is not aligned with NERC and attempts to integrate AB specific ISO rule requirements directly into the Alberta Reliability Standard. <ul style="list-style-type: none"> <li>• Consistent with most other Canadian provinces, Capital Power strongly encourages the AESO to align Alberta Reliability Standards (ARS) with NERC Reliability Standards and to use ISO rules to address additional Alberta specific requirements. Adherence to NERC standards allows industry to effectively use NERC resources (i.e., white papers, webinars etc.) thereby reducing the need for the AESO to develop and maintain such resources. Further, NERC</li> </ul> </li> </ol>



Stakeholder Comment Matrix on the following:

- 1) Proposed new COM-001-AB-3, *Communications* (“new COM-001-AB-3”);
- 2) Proposed new COM-002-AB-4, *Operating Personnel Communication Protocols* (“new COM-002-AB-4”);
- 3) Proposed retirement of existing COM-001-AB1-1.1, *Communications* (“existing COM-001-AB1-1.1”);
- 4) Proposed retirement of existing COM-002-AB1-2a, *Operating Personnel Communication Protocols* (“existing COM-002-AB1-2a”); and
- 5) Proposed amended Section 502.4 of the ISO rules, *Automated Dispatch and Messaging System and Voice Communication System Requirements* (“Section 502.4”).

(collectively referred to as the “Communication ISO Rule and Reliability Standards”)



AESO Questions to Stakeholders: Proposed New COM-001-AB-3	Stakeholder Comments and/or Alternative Proposal
	<p>alignment creates synergies for those entities that own and operate RS applicable assets outside of Alberta and in so doing may remove potential regulatory / compliance barriers to investment in the Alberta energy market. Failure to adhere to NERC standards including, but not limited to, different wording, rearranging, or consolidating requirements, adding additional requirements etc. increases complexities and the potential for administrative compliance errors with no or limited ‘payoff’ to grid reliability, resiliency, or security. Modification of NERC standards is also highly likely to cause issues when the AESO attempts to implement future revisions of NERC standards.</p> <ul style="list-style-type: none"> <li>• Capital Power recognizes that the AESO plays a unique role in the Alberta Interconnected Electric System (AIES) in that it operates as Reliability Coordinator, Balancing Authority, Planning Coordinator etc. and appreciates the AESO’s efforts to streamline this standard via the consolidation of multiple requirements. However, such consolidation creates administrative difficulties for organizations overseeing a centralized compliance program with entities in NERC aligned provinces and states. Further, this modification of NERC standards may result in issues when / if NERC updates the equivalent NERC standard in future years. Similarly, Capital Power appreciates the AESO’s efforts to map the various requirements from the NERC standard to the ISO rule to the proposed COM-001-AB-3 standard but offers that the necessity for such a mapping exercise may be indicative of a standard that is too complex and may increase the likelihood of administrative non-compliance and / or a distraction from critical reliability, resiliency and security issues.</li> </ul> <p>2. <b>Non-Risk Based Applicability Threshold</b> – NERC uses the Bulk Electric System (BES) as the threshold of applicability for all Reliability Standards (RS) which is aligned with the risk these BES assets may pose to the Bulk Power System (BPS). The proposed AESO version of COM-001-AB-3 uses direct connection to the transmission system and a 5MW real power rating as the threshold of applicability. Capital Power does not believe that</p>



Stakeholder Comment Matrix on the following:

- 1) Proposed new COM-001-AB-3, *Communications* (“new COM-001-AB-3”);
- 2) Proposed new COM-002-AB-4, *Operating Personnel Communication Protocols* (“new COM-002-AB-4”);
- 3) Proposed retirement of existing COM-001-AB1-1.1, *Communications* (“existing COM-001-AB1-1.1”);
- 4) Proposed retirement of existing COM-002-AB1-2a, *Operating Personnel Communication Protocols* (“existing COM-002-AB1-2a”); and
- 5) Proposed amended Section 502.4 of the ISO rules, *Automated Dispatch and Messaging System and Voice Communication System Requirements* (“Section 502.4”).

(collectively referred to as the “Communication ISO Rule and Reliability Standards”)



AESO Questions to Stakeholders: Proposed New COM-001-AB-3	Stakeholder Comments and/or Alternative Proposal
	<p>the AESO applicability threshold is consistent with a risk-based approach to the reliability, resiliency, and security of the Bulk Electric System or the Alberta Interconnected Electricity System.</p> <ul style="list-style-type: none"> <li>• Consistent with most other Canadian provinces, Capital Power strongly encourages the AESO to align Alberta Reliability Standards (ARS) with NERC Reliability Standards and use the Bulk Electric System as the applicability threshold for all Alberta Reliability Standards.</li> <li>• Capital Power would like to understand if the AESO has benchmarked the proposed requirements against market rules in other regions? If such an exercise has taken place Capital Power requests that the AESO share the results to support Market Participants understanding of these proposed requirements</li> </ul> <p>3. <b>RSAW Availability</b> – Capital Power is hesitant to support any proposed Reliability Standard without an opportunity to review the associated RSAW. Each Reliability Standard and requirement must be written in such a way that the evidence to demonstrate compliance is clearly outlined and not more burdensome than the reliability requirement itself.</p> <p>4. <b>Evidence</b> – Unlike the NERC version of the COM-001 standard, the proposed AESO version of the standard does not clearly articulate evidence retention requirements. Given the copious amount of evidence that may be required to demonstrate an entities compliance with these requirements Capital Power recommends that the AESO incorporate an evidence retention section to the proposed COM-001-AB-3 standard. Like it's NERC equivalent, Capital Power recommends that in order to avoid placing an undue burden on industry, the retention requirements for all requirements where voice recordings or operator logs are listed as appropriate evidence be shortened to twelve calendar months for written documentation and 90 calendar days for voice recordings.</p>

Stakeholder Comment Matrix on the following:

- 1) Proposed new COM-001-AB-3, *Communications* (“new COM-001-AB-3”);
- 2) Proposed new COM-002-AB-4, *Operating Personnel Communication Protocols* (“new COM-002-AB-4”);
- 3) Proposed retirement of existing COM-001-AB1-1.1, *Communications* (“existing COM-001-AB1-1.1”);
- 4) Proposed retirement of existing COM-002-AB1-2a, *Operating Personnel Communication Protocols* (“existing COM-002-AB1-2a”); and
- 5) Proposed amended Section 502.4 of the ISO rules, *Automated Dispatch and Messaging System and Voice Communication System Requirements* (“Section 502.4”).

(collectively referred to as the “Communication ISO Rule and Reliability Standards”)



AESO Questions to Stakeholders: Proposed New COM-001-AB-3	Stakeholder Comments and/or Alternative Proposal
<p>3. Please provide any comments, concerns, or suggested alternative language on the proposed amended information document, ID #2012-001RS, <i>Communications</i>.</p>	<p>Capital Power appreciates the AESO’s effort to add context via the proposed information document. However, in line with other comments, Capital Power believes that the need for such a robust ID is reflective of a standard that is too complex and administratively burdensome.</p>
<p>4. Do you agree that the proposed new COM-001-AB-3 is not technically deficient? If not, why.</p>	<p>Capital Power offers no comment on this question.</p>
<p>5. Do you agree that the proposed new COM-001-AB-3 supports the public interest? If not, why?</p>	<p>Capital Power believes that the NERC version of COM-001-3 supports the public interest in that it provides a risk based approach ensuring the reliability, resiliency and the security of the Bulk Electric System through the enabling or support of one or more <a href="#">reliability principles</a>. However, Capital Power does not believe that the AESO’s proposed COM-001-AB-3 standard, which has been heavily modified from its NERC equivalent, supports public interest for the following reasons:</p> <ol style="list-style-type: none"> <li>1. The proposed standard is not risk based. As a result, it will bring entities as small as 5MW into scope. This increases costs and resources associated with complying with this standard with negligible trade off to reliability, resiliency, or security. Further, the non-risk-based nature of this standard may detract from the functional task of efficiently and reliably producing and distributing power to the public. <ul style="list-style-type: none"> <li>• As an example, Capital Power draws attention to the proposed COM-001-AB-3 R8.A2 which requires each generator over 5MW to have AESO prescribed backup communication. The NERC equivalent of this standard limits this requirement to Reliability Coordinators, Transmission Operators, and Balancing Authorities. If the AESO is intent on applying this requirement to generators Capital Power recommends increasing the threshold to generators that meet the BES definition.</li> </ul> </li> </ol>

Stakeholder Comment Matrix on the following:

- 1) Proposed new COM-001-AB-3, *Communications* (“new COM-001-AB-3”);
- 2) Proposed new COM-002-AB-4, *Operating Personnel Communication Protocols* (“new COM-002-AB-4”);
- 3) Proposed retirement of existing COM-001-AB1-1.1, *Communications* (“existing COM-001-AB1-1.1”);
- 4) Proposed retirement of existing COM-002-AB1-2a, *Operating Personnel Communication Protocols* (“existing COM-002-AB1-2a”); and
- 5) Proposed amended Section 502.4 of the ISO rules, *Automated Dispatch and Messaging System and Voice Communication System Requirements* (“Section 502.4”).

(collectively referred to as the “Communication ISO Rule and Reliability Standards”)



AESO Questions to Stakeholders: Proposed New COM-001-AB-3	Stakeholder Comments and/or Alternative Proposal
	<ul style="list-style-type: none"> <li>• As an example, Capital Power draws attention to the proposed COM-001-AB-3 R9 which requires Responsible Entities to test each backup communication capability at least once each month. Because the applicability to this standard brings entities as small as 5MW into scope the resulting testing schedule may result in significant time and attention spent on testing backup phone capabilities each month.</li> </ul> <ol style="list-style-type: none"> <li>2. The proposed standard is not aligned with NERC as a result the AESO and industry are not able to realize the synergies and efficiencies of utilizing NERC resources. The increased costs associated with complying with this standard may impact the public either directly through increased electricity costs and / or indirectly due to the potential that the RS compliance complexities in Alberta as compared to NERC aligned provinces and states may disincentivize potential investors.</li> <li>3. The proposed standard is overly complex and prescriptive which may result in increased potential non-compliance and / or a distraction from more critical reliability issues.</li> <li>4. The proposed standard will require financial and human resources. As it is currently written it is not risk based nor is it technology agnostic. If applicable Market Participants, are expected to invest in technology prescribed by the AESO, Capital Power recommends that generators be grandfathered in such that future revisions to this standard because of technology changes will not apply. Alternatively (and preferred), Capital Power recommends that the standard be written to be technology agnostic such that it is up to the Market Participant to meet and maintain compliance.</li> <li>5. The proposed standard and supporting information document dictate the use of two specific satellite telephone system options. While Capital Power agrees that BES entities should have backup communication capabilities such as a satellite phone, in line with FERC Order No. 693, Capital Power believes that Reliability Standards should incorporate adequate flexibility for compliance to allow for the adoption of new</li> </ol>

Stakeholder Comment Matrix on the following:

- 1) Proposed new COM-001-AB-3, *Communications* (“new COM-001-AB-3”);
- 2) Proposed new COM-002-AB-4, *Operating Personnel Communication Protocols* (“new COM-002-AB-4”);
- 3) Proposed retirement of existing COM-001-AB1-1.1, *Communications* (“existing COM-001-AB1-1.1”);
- 4) Proposed retirement of existing COM-002-AB1-2a, *Operating Personnel Communication Protocols* (“existing COM-002-AB1-2a”); and
- 5) Proposed amended Section 502.4 of the ISO rules, *Automated Dispatch and Messaging System and Voice Communication System Requirements* (“Section 502.4”).

(collectively referred to as the “Communication ISO Rule and Reliability Standards”)



AESO Questions to Stakeholders: Proposed New COM-001-AB-3	Stakeholder Comments and/or Alternative Proposal
	<p>technologies and cost-effective solutions<sup>1</sup>. Allowing such flexibility not only ensures the longevity of regulations, but also ensures that organizations that own and operate assets in and out of Alberta do not have to purchase and maintain separate alternative communication equipment solely for its Alberta based assets.</p> <ol style="list-style-type: none"> <li>a. Capital Power encourages the AESO to reference FERC Order No. 693 Stats. &amp; Regs. ¶ 31,242 at P 508.</li> <li>b. Capital Power encourages the AESO to refer to Ontario <a href="#">IESO Chapter 2 – Appendix 2.2</a>; Capital Power draws the AESO’s attention to the following:               <ol style="list-style-type: none"> <li>i. The IESO’s requirement sits in a Market Rule while the associated NERC COM-001 remains unchanged and fully applicable at the BES level</li> <li>ii. The IESO’s requirement is risk based and technology agnostic.</li> </ol> </li> </ol>
<p>6. If approved, the AESO will propose an effective date of 3 calendar quarters after Commission approval. Do you agree? If not, why not?</p>	<p>With the exception of R8.A1, Capital Power recommends an implementation plan of 4 calendar quarters after Commission approval. Capital Power recommends an implementation plan of 24 calendar months after Commission approval due to the potential cost and resource implications specific to this requirement.</p>

AESO Questions to Stakeholders: Proposed New COM-002-AB-4	Stakeholder Comments and/or Alternative Proposal
<p>1. Are there any requirements contained in the proposed new COM-002-AB-4 that are not clearly articulated? If yes, please indicate</p>	<p>N/A</p>

<sup>1</sup> Order No. 693, FERC Stats. & Regs. ¶ 31,242 at P 508.

Stakeholder Comment Matrix on the following:

- 1) Proposed new COM-001-AB-3, *Communications* (“new COM-001-AB-3”);
- 2) Proposed new COM-002-AB-4, *Operating Personnel Communication Protocols* (“new COM-002-AB-4”);
- 3) Proposed retirement of existing COM-001-AB1-1.1, *Communications* (“existing COM-001-AB1-1.1”);
- 4) Proposed retirement of existing COM-002-AB1-2a, *Operating Personnel Communication Protocols* (“existing COM-002-AB1-2a”); and
- 5) Proposed amended Section 502.4 of the ISO rules, *Automated Dispatch and Messaging System and Voice Communication System Requirements* (“Section 502.4”).

(collectively referred to as the “Communication ISO Rule and Reliability Standards”)



AESO Questions to Stakeholders: Proposed New COM-002-AB-4	Stakeholder Comments and/or Alternative Proposal
<p>the specific section of the proposed new COM-002-AB-4, describe the concern and suggest alternative language.</p>	
<p>2. Do you have any additional comments regarding the proposed new COM-002-AB-4? If yes, please specify.</p>	<p>Currently, Capital Power does not support the proposed COM-002-AB-4 standard and offers the following for AESO’s consideration:</p> <ol style="list-style-type: none"> <li>1. <b>Non-Risk Based Applicability Threshold</b> – NERC uses the Bulk Electric System (BES) as the threshold of applicability for all Reliability Standards (RS) which is aligned with the risk these BES assets may pose to the Bulk Power System (BPS). The proposed AESO version of COM-002-AB-4 uses direct connection to the transmission system and a 5MW real power rating as the threshold of applicability. Capital Power does not believe that the AESO applicability threshold is consistent with a risk-based approach to the reliability, resiliency, and security of the Bulk Electric System or the Alberta Interconnected Electricity System. <ul style="list-style-type: none"> <li>• Consistent with most other Canadian provinces, Capital Power strongly encourages the AESO to align Alberta Reliability Standards (ARS) with NERC Reliability Standards and use the Bulk Electric System as the applicability threshold for all Alberta Reliability Standards.</li> </ul> </li> <li>2. <b>Emergency Operating Instructions</b> – Similar to the NERC version of COM-002-4, Capital Power recommends that the proposed AESO version of COM-002-AB-4 R6 be changed such that repeat back protocol is only required for Emergency Operating Instructions. This amendment is consistent with a risk-based approach to grid reliability, resiliency, and security and will significantly reduce the number of events an entity has to demonstrate compliance with. As it is currently written, COM-002-AB-4 R6 will create an undue burden on industry and the AESO when it comes to auditing compliance with this standard.</li> </ol>

Stakeholder Comment Matrix on the following:

- 1) Proposed new COM-001-AB-3, *Communications* (“new COM-001-AB-3”);
- 2) Proposed new COM-002-AB-4, *Operating Personnel Communication Protocols* (“new COM-002-AB-4”);
- 3) Proposed retirement of existing COM-001-AB1-1.1, *Communications* (“existing COM-001-AB1-1.1”);
- 4) Proposed retirement of existing COM-002-AB1-2a, *Operating Personnel Communication Protocols* (“existing COM-002-AB1-2a”); and
- 5) Proposed amended Section 502.4 of the ISO rules, *Automated Dispatch and Messaging System and Voice Communication System Requirements* (“Section 502.4”).

(collectively referred to as the “Communication ISO Rule and Reliability Standards”)



AESO Questions to Stakeholders: Proposed New COM-002-AB-4	Stakeholder Comments and/or Alternative Proposal
3. Please provide any comments, concerns, or suggested alternative language on the proposed new information document, ID #2022-001, <i>Operating Personnel Communication Protocols</i> .	Capital Power offers no comment.
4. Do you agree that the proposed new COM-002-AB-4 is not technically deficient? If not, why.	Capital Power offers no comment.
5. Do you agree that the proposed new COM-002-AB-4 supports the public interest? If not, why?	Yes
6. If approved, the AESO will propose an effective date of 3 calendar quarters after Commission approval. Do you agree? If not, why not?	Capital Power agrees with the proposed effective date of 3 calendar quarters after Commission approval.

AESO Questions to Stakeholders: Proposed Retirement of Existing COM-001-AB1-1.1	Stakeholder Comments and/or Alternative Proposal
1. Do you have any concerns with the proposed retirement of the existing COM-001-AB1-1.1? If yes, please specify.	Capital Power offers no comment.

Stakeholder Comment Matrix on the following:

- 1) Proposed new COM-001-AB-3, *Communications* (“new COM-001-AB-3”);
- 2) Proposed new COM-002-AB-4, *Operating Personnel Communication Protocols* (“new COM-002-AB-4”);
- 3) Proposed retirement of existing COM-001-AB1-1.1, *Communications* (“existing COM-001-AB1-1.1”);
- 4) Proposed retirement of existing COM-002-AB1-2a, *Operating Personnel Communication Protocols* (“existing COM-002-AB1-2a”); and
- 5) Proposed amended Section 502.4 of the ISO rules, *Automated Dispatch and Messaging System and Voice Communication System Requirements* (“Section 502.4”).

(collectively referred to as the “Communication ISO Rule and Reliability Standards”)



AESO Questions to Stakeholders: Proposed Retirement of Existing COM-002-AB1-2a	Stakeholder Comments and/or Alternative Proposal
1. Do you have any concerns with the proposed retirement of the existing COM-002-AB1-2a? If yes, please specify.	Capital Power offers no comment.

AESO Questions to Stakeholders: Proposed Amended Section 502.4	Stakeholder Comments and/or Alternative Proposal
1. Do you understand and agree with the objective or purpose of the proposed amended Section 502.4 and whether, in your view, the proposed amended Section 502.4 meets the objective or purpose? If not, why.	Capital Power does not support the integration of ISO rule related requirements into Reliability Standards. Capital Power recommends that all of the proposed COM-001-AB-3 amended requirements (i.e., those w/ an ‘A’ in the title) be removed from the proposed AESO Reliability Standard and added to the ISO rule. Capital Power’s comments re. the appropriateness of AESO prescribing technology / software / service providers remain intact regardless of where these requirements sit.
2. Do you agree that the proposed amended Section 502.4 is not technically deficient? If not, why.	Capital Power offers no comment.
3. Do you agree with the proposed amended Section 502.4, taken together with all ISO rules and reliability standards, supports a fair, efficient, and openly competitive market? If not, why?	Capital Power offers no comment.



Stakeholder Comment Matrix on the following:

- 1) Proposed new COM-001-AB-3, *Communications* (“new COM-001-AB-3”);
- 2) Proposed new COM-002-AB-4, *Operating Personnel Communication Protocols* (“new COM-002-AB-4”);
- 3) Proposed retirement of existing COM-001-AB1-1.1, *Communications* (“existing COM-001-AB1-1.1”);
- 4) Proposed retirement of existing COM-002-AB1-2a, *Operating Personnel Communication Protocols* (“existing COM-002-AB1-2a”); and
- 5) Proposed amended Section 502.4 of the ISO rules, *Automated Dispatch and Messaging System and Voice Communication System Requirements* (“Section 502.4”).

(collectively referred to as the “Communication ISO Rule and Reliability Standards”)



AESO Questions to Stakeholders: Proposed Amended Section 502.4	Stakeholder Comments and/or Alternative Proposal
4. Do you agree that the proposed amended Section 502.4 supports the public interest? If not, why?	Please see Capital Power’s responses to COM-001-AB-3 Q. 1-5.
5. If approved, the AESO will propose an effective date of 3 calendar quarters after Commission approval. Do you agree? If not, why not?	Capital Power agrees with this effective date.
6. Any additional comments regarding the proposed amended Section 502.4?	Please see Capital Power’s responses to COM-001-AB-3 Q. 1-5.
7. Please provide any comments, concerns, or suggested alternative language on the proposed amended ID, #2017-006R, <i>Automated Dispatch and Messaging System Requirements</i> .	Capital Power offers no comment.



Stakeholder Comment Matrix on the following:

- 1) Proposed new COM-001-AB-3, *Communications* (“new COM-001-AB-3”);
- 2) Proposed new COM-002-AB-4, *Operating Personnel Communication Protocols* (“new COM-002-AB-4”);
- 3) Proposed retirement of existing COM-001-AB1-1.1, *Communications* (“existing COM-001-AB1-1.1”);
- 4) Proposed retirement of existing COM-002-AB1-2a, *Operating Personnel Communication Protocols* (“existing COM-002-AB1-2a”); and
- 5) Proposed amended Section 502.4 of the ISO rules, *Automated Dispatch and Messaging System and Voice Communication System Requirements* (“Section 502.4”).

(collectively referred to as the “Communication ISO Rule and Reliability Standards”)



Date of Request for Comment:	July 27, 2022	Contact:	Mark McGillivray
Period of Comment:	July 27, 2022 through August 19, 2022	Phone:	
Comments From:	ENMAX Corporation (and its affiliates)	Email:	<a href="mailto:MMcGillivray@enmax.com">MMcGillivray@enmax.com</a>
Date:	2022-08-19		

Instructions:

1. Please fill out the section above as indicated.
2. Please refer back to the Consultation Letter under the “Consultation Letter Materials” section to view materials related to the Communication ISO Rule and Reliability Standards.
3. Please respond to the questions below and provide your specific comments, proposed revisions, and reasons for your position underneath (if any). Blank boxes will be interpreted as favourable comments.
4. Please be advised that general comments do not give the AESO any specific issue to consider and address, and results in a general response.

**The AESO is seeking comments from Stakeholders on the Communication ISO Rule and Reliability Standards with regard to the following matters:**

AESO Questions to Stakeholders: Proposed New COM-001-AB-3	Stakeholder Comments and/or Alternative Proposal
1. Are there any requirements contained in the proposed new COM-001-AB-3 that are not clearly articulated? If yes, please indicate the specific section of the	<p><b>R9:</b></p> <ul style="list-style-type: none"> <li>• If a participant maintained their satellite phones in addition to utility orderwire service, would they also have to test the satellite phones?</li> </ul>

Stakeholder Comment Matrix on the following:

- 1) Proposed new COM-001-AB-3, *Communications* (“new COM-001-AB-3”);
- 2) Proposed new COM-002-AB-4, *Operating Personnel Communication Protocols* (“new COM-002-AB-4”);
- 3) Proposed retirement of existing COM-001-AB1-1.1, *Communications* (“existing COM-001-AB1-1.1”);
- 4) Proposed retirement of existing COM-002-AB1-2a, *Operating Personnel Communication Protocols* (“existing COM-002-AB1-2a”); and
- 5) Proposed amended Section 502.4 of the ISO rules, *Automated Dispatch and Messaging System and Voice Communication System Requirements* (“Section 502.4”).

(collectively referred to as the “Communication ISO Rule and Reliability Standards”)



AESO Questions to Stakeholders: Proposed New COM-001-AB-3	Stakeholder Comments and/or Alternative Proposal
<p>proposed new COM-001-AB-3, describe the concern, and suggest alternative language.</p>	<ul style="list-style-type: none"> <li>• R9 states that “If the test is unsuccessful, the Responsible Entity must initiate action to repair or designate a temporary replacement backup voice communication capability within 2 hours of the unsuccessful test.” Does the designation need to occur within 2 hours or both the repair and the designation need to occur within 2 hours?</li> </ul> <p><b><u>R10 and R11</u></b></p> <ul style="list-style-type: none"> <li>• As a TFO and DFO, ENMAX would follow R10 upon detection of the failure of our primary voice communication capability and then follow additional requirements under R11. Can R11 be modified so that if all communications are completed under R10, R11 is not required?</li> <li>• There is no time requirement within R11, where the operator must <u>consult</u> with each entity effected by the failure. However, under R10, the operator must notify entities within 60 minutes of the detection of a failure of its primary voice communication capability that lasts 30 minutes or longer. If the failure lasts less than 30 minutes (as noted under R10), is there a requirement under R11 to consult?</li> </ul> <p><b><u>R12 and R13:</u></b></p> <ul style="list-style-type: none"> <li>• Entities must have internal primary voice communication capability with field personnel. Would having more than one primary voice communication capability with field personnel satisfy the requirement or must there only be at least one primary?</li> </ul>
<p>2. Do you have any additional comments regarding the proposed new COM-001-AB-3? If yes, please specify.</p>	<p>ENMAX strongly encourages the AESO to issue the RSAW as soon as reasonably possible, or prior to the AESO forwarding the ARS to the AUC for enforcement action.</p>

Stakeholder Comment Matrix on the following:

- 1) Proposed new COM-001-AB-3, *Communications* (“new COM-001-AB-3”);
- 2) Proposed new COM-002-AB-4, *Operating Personnel Communication Protocols* (“new COM-002-AB-4”);
- 3) Proposed retirement of existing COM-001-AB1-1.1, *Communications* (“existing COM-001-AB1-1.1”);
- 4) Proposed retirement of existing COM-002-AB1-2a, *Operating Personnel Communication Protocols* (“existing COM-002-AB1-2a”); and
- 5) Proposed amended Section 502.4 of the ISO rules, *Automated Dispatch and Messaging System and Voice Communication System Requirements* (“Section 502.4”).

(collectively referred to as the “Communication ISO Rule and Reliability Standards”)



AESO Questions to Stakeholders: Proposed New COM-001-AB-3	Stakeholder Comments and/or Alternative Proposal
	<p><b><u>R14:</u></b></p> <ul style="list-style-type: none"> <li>• Regarding R14.A1, is there any plan for the AESO to designate an approved satellite network system that would impact the use of either Iridium or MSAT?</li> </ul>
<p>3. Please provide any comments, concerns, or suggested alternative language on the proposed amended information document, ID #2012-001RS, <i>Communications</i>.</p>	<p>The term “public telephone network” refers to the commercial telephone system. Can the AESO please provide more clarity on what this means? Mobile phone network, landline network, VOIP system etc.</p> <p><b><u>Under ID#2012-001RS, Section 2.2:</u></b></p> <ul style="list-style-type: none"> <li>• ENMAX understands that a generating unit/aggregated generating facility that is remotely controlled and monitored from a separate control room, would not be included as a control room under (c) either local or remote to the generating unit or aggregated generating facility. Can the AESO please confirm ENMAX’s understanding?</li> </ul>
<p>4. Do you agree that the proposed new COM-001-AB-3 is not technically deficient? If not, why.</p>	<p>Agree</p>
<p>5. Do you agree that the proposed new COM-001-AB-3 supports the public interest? If not, why?</p>	<p>Agree, as long as there is a strong cost benefit case undertaken and suitable consultation processes, ENMAX supports new standards that enhance reliability.</p>
<p>6. If approved, the AESO will propose an effective date of 3 calendar quarters after Commission approval. Do you agree? If not, why not?</p>	<p>Disagree. ENMAX requests that the AESO propose an effective date of at least 4-calendar quarters after Commission approval. There are requirements within both COM-001-AB-3 and COM-002-AB-4 that require</p>

Stakeholder Comment Matrix on the following:

- 1) Proposed new COM-001-AB-3, *Communications* (“new COM-001-AB-3”);
- 2) Proposed new COM-002-AB-4, *Operating Personnel Communication Protocols* (“new COM-002-AB-4”);
- 3) Proposed retirement of existing COM-001-AB1-1.1, *Communications* (“existing COM-001-AB1-1.1”);
- 4) Proposed retirement of existing COM-002-AB1-2a, *Operating Personnel Communication Protocols* (“existing COM-002-AB1-2a”); and
- 5) Proposed amended Section 502.4 of the ISO rules, *Automated Dispatch and Messaging System and Voice Communication System Requirements* (“Section 502.4”).

(collectively referred to as the “Communication ISO Rule and Reliability Standards”)



AESO Questions to Stakeholders: Proposed New COM-001-AB-3	Stakeholder Comments and/or Alternative Proposal
	extensive work, including training, procedures/protocols, etc. ENMAX believes the extra time would be helpful for participants.

AESO Questions to Stakeholders: Proposed New COM-002-AB-4	Stakeholder Comments and/or Alternative Proposal
<p>1. Are there any requirements contained in the proposed new COM-002-AB-4 that are not clearly articulated? If yes, please indicate the specific section of the proposed new COM-002-AB-4, describe the concern and suggest alternative language.</p>	<p>As a generator, ENMAX strongly encourages the AESO to exclude transmission facilities that operate a radial line, as included under COM-001, copied below:</p> <p style="text-align: center;"><i>Transmission facilities that only operate a radial circuit at the control room or only operates a transmission facility identified in a list the ISO publishes on the AESO website.</i></p> <p>These transmission facilities do not typically operate in the same manner as TFO’s, and having to comply with the COM-002-AB-4 requirements could create excessive and likely unnecessary work and cost, specifically under R1, R2, and R4. Training would be included under R3 (as operator of a generating unit).</p> <p><b><u>COM-002-AB-4, R3:</u></b></p> <ul style="list-style-type: none"> <li>• Each operator of an electric distribution system, operator of a generating unit, and the operator of an aggregated generating facility must conduct initial training for each of its operating personnel who can receive an oral two-party, person-to-person operating instruction prior to that individual operator receiving an oral two-party, person-to-person operating instruction, including directives, to either:</li> </ul>

Stakeholder Comment Matrix on the following:

- 1) Proposed new COM-001-AB-3, *Communications* (“new COM-001-AB-3”);
- 2) Proposed new COM-002-AB-4, *Operating Personnel Communication Protocols* (“new COM-002-AB-4”);
- 3) Proposed retirement of existing COM-001-AB1-1.1, *Communications* (“existing COM-001-AB1-1.1”);
- 4) Proposed retirement of existing COM-002-AB1-2a, *Operating Personnel Communication Protocols* (“existing COM-002-AB1-2a”); and
- 5) Proposed amended Section 502.4 of the ISO rules, *Automated Dispatch and Messaging System and Voice Communication System Requirements* (“Section 502.4”).

(collectively referred to as the “Communication ISO Rule and Reliability Standards”)



AESO Questions to Stakeholders: Proposed New COM-002-AB-4	Stakeholder Comments and/or Alternative Proposal
	<p>(a) repeat, not necessarily verbatim, the operating instruction and receive confirmation from the issuer that the response was correct; or</p> <p>(b) request that the issuer reissue the operating instruction.</p> <ul style="list-style-type: none"> <li>• ENMAX requests clarity on the types of instructions that would be included under R3 (instruction is included in R1 as well as R3). For example, under VAR-002-AB-4.1, R2, an operator must “upon receiving an instruction from the ISO regarding voltage levels or reactive power, comply with that instruction.”</li> <li>• ENMAX understands that these types of instructions (voltage levels or reactive power) would not be included within COM-002-AB-4, as they are managed under VAR-002-AB-4.1. Can the AESO please confirm?</li> </ul> <p><b><u>COM-002-AB-4, R6:</u></b></p> <ul style="list-style-type: none"> <li>• Each operator of an electric distribution system, operator of a generating unit, operator of an aggregated generating facility, and operator of transmission facility that receives an oral two-party, person-to-person directive, excluding written or oral single-party to multiple-party burst directives, must either: <ul style="list-style-type: none"> <li>(a) repeat, not necessarily verbatim, the directive and receive confirmation from the issuer that the response was correct, or</li> <li>(b) request that the issuer reissue the directive.</li> </ul> </li> </ul> <p>ENMAX requests that R6 include language “during an emergency”, as included in the NERC Version (copied below).</p>

Stakeholder Comment Matrix on the following:

- 1) Proposed new COM-001-AB-3, *Communications* (“new COM-001-AB-3”);
- 2) Proposed new COM-002-AB-4, *Operating Personnel Communication Protocols* (“new COM-002-AB-4”);
- 3) Proposed retirement of existing COM-001-AB1-1.1, *Communications* (“existing COM-001-AB1-1.1”);
- 4) Proposed retirement of existing COM-002-AB1-2a, *Operating Personnel Communication Protocols* (“existing COM-002-AB1-2a”); and
- 5) Proposed amended Section 502.4 of the ISO rules, *Automated Dispatch and Messaging System and Voice Communication System Requirements* (“Section 502.4”).

(collectively referred to as the “Communication ISO Rule and Reliability Standards”)



AESO Questions to Stakeholders: Proposed New COM-002-AB-4	Stakeholder Comments and/or Alternative Proposal
	<p><i>NERC R6: Each Balancing Authority, Distribution Provider, Generator Operator, and Transmission Operator that receives an oral two-party, person-to-person Operating Instruction during an Emergency, excluding written or oral single-party to multiparty burst Operating Instructions, shall either: [Violation Risk Factor: High][Time Horizon: Real-time Operations] <input type="checkbox"/> Repeat, not necessarily verbatim, the Operating Instruction and receive confirmation from the issuer that the response was correct, or <input type="checkbox"/> Request that the issuer reissue the Operating Instruction.</i></p>
<p>2. Do you have any additional comments regarding the proposed new COM-002-AB-4? If yes, please specify.</p>	<p><b><u>COM-002-AB-4, R4:</u></b></p> <ul style="list-style-type: none"> <li>• R4 requires assessing adherence to the documented communication protocols and assessing the effectiveness of the documented communication protocols every 12-months.</li> </ul> <p>12-month frequencies force participants to complete activities earlier each year to maintain 12-month deliverables. The frequency should be changed to annually or at least once every 15-months (similar to EOP-005 and PER-005 requiring training and evaluations each calendar year).</p> <ul style="list-style-type: none"> <li>• The RSAW for this ARS should be distributed for stakeholder feedback in advance of the ARS being forwarded to the AUC.</li> </ul>
<p>3. Please provide any comments, concerns, or suggested alternative language on the proposed new information document, ID #2022-001, <i>Operating Personnel Communication Protocols</i>.</p>	<p>No comment</p>

Stakeholder Comment Matrix on the following:

- 1) Proposed new COM-001-AB-3, *Communications* (“new COM-001-AB-3”);
- 2) Proposed new COM-002-AB-4, *Operating Personnel Communication Protocols* (“new COM-002-AB-4”);
- 3) Proposed retirement of existing COM-001-AB1-1.1, *Communications* (“existing COM-001-AB1-1.1”);
- 4) Proposed retirement of existing COM-002-AB1-2a, *Operating Personnel Communication Protocols* (“existing COM-002-AB1-2a”); and
- 5) Proposed amended Section 502.4 of the ISO rules, *Automated Dispatch and Messaging System and Voice Communication System Requirements* (“Section 502.4”).

(collectively referred to as the “Communication ISO Rule and Reliability Standards”)



AESO Questions to Stakeholders: Proposed New COM-002-AB-4	Stakeholder Comments and/or Alternative Proposal
4. Do you agree that the proposed new COM-002-AB-4 is not technically deficient? If not, why.	Agree
5. Do you agree that the proposed new COM-002-AB-4 supports the public interest? If not, why?	Agree, as long as there is a strong cost benefit case undertaken and suitable consultation processes, ENMAX supports new standards that enhance reliability.
6. If approved, the AESO will propose an effective date of 3 calendar quarters after Commission approval. Do you agree? If not, why not?	Disagree. ENMAX requests the AESO propose an effective date of at least 4-calendar quarters after Commission approval. There are requirements within both COM-001-AB-3 and COM-002-AB-4 that require extensive work, cost, including training, procedures/protocols, etc. ENMAX believes the extra time would be helpful for participants.

AESO Questions to Stakeholders: Proposed Retirement of Existing COM-001-AB1-1.1	Stakeholder Comments and/or Alternative Proposal
1. Do you have any concerns with the proposed retirement of the existing COM-001-AB1-1.1? If yes, please specify.	No concerns

AESO Questions to Stakeholders: Proposed Retirement of Existing COM-002-AB1-2a	Stakeholder Comments and/or Alternative Proposal
--	--

Stakeholder Comment Matrix on the following:

- 1) Proposed new COM-001-AB-3, *Communications* (“new COM-001-AB-3”);
- 2) Proposed new COM-002-AB-4, *Operating Personnel Communication Protocols* (“new COM-002-AB-4”);
- 3) Proposed retirement of existing COM-001-AB1-1.1, *Communications* (“existing COM-001-AB1-1.1”);
- 4) Proposed retirement of existing COM-002-AB1-2a, *Operating Personnel Communication Protocols* (“existing COM-002-AB1-2a”); and
- 5) Proposed amended Section 502.4 of the ISO rules, *Automated Dispatch and Messaging System and Voice Communication System Requirements* (“Section 502.4”).

(collectively referred to as the “Communication ISO Rule and Reliability Standards”)



1. Do you have any concerns with the proposed retirement of the existing COM-002-AB1-2a? If yes, please specify.	No concerns
--	-------------

AESO Questions to Stakeholders: Proposed Amended Section 502.4	Stakeholder Comments and/or Alternative Proposal
1. Do you understand and agree with the objective or purpose of the proposed amended Section 502.4 and whether, in your view, the proposed amended Section 502.4 meets the objective or purpose? If not, why.	Agree
2. Do you agree that the proposed amended Section 502.4 is not technically deficient? If not, why.	Agree
3. Do you agree with the proposed amended Section 502.4, taken together with all ISO rules and reliability standards, supports a fair, efficient, and openly competitive market? If not, why?	Agree
4. Do you agree that the proposed amended Section 502.4 supports the public interest? If not, why?	Agree, as long as there is a strong cost benefit case undertaken and suitable consultation processes, ENMAX supports new rules that enhance reliability.
5. If approved, the AESO will propose an effective date of 3 calendar quarters after Commission approval. Do you agree? If not, why not?	ENMAX requests the AESO propose an effective date of at least 4-calendar quarters after Commission approval, to align with COM-001 and COM-002.
6. Any additional comments regarding the proposed	No



Stakeholder Comment Matrix on the following:

- 1) Proposed new COM-001-AB-3, *Communications* (“new COM-001-AB-3”);
- 2) Proposed new COM-002-AB-4, *Operating Personnel Communication Protocols* (“new COM-002-AB-4”);
- 3) Proposed retirement of existing COM-001-AB1-1.1, *Communications* (“existing COM-001-AB1-1.1”);
- 4) Proposed retirement of existing COM-002-AB1-2a, *Operating Personnel Communication Protocols* (“existing COM-002-AB1-2a”); and
- 5) Proposed amended Section 502.4 of the ISO rules, *Automated Dispatch and Messaging System and Voice Communication System Requirements* (“Section 502.4”).

(collectively referred to as the “Communication ISO Rule and Reliability Standards”)



AESO Questions to Stakeholders: Proposed Amended Section 502.4	Stakeholder Comments and/or Alternative Proposal
amended Section 502.4?	
7 Please provide any comments, concerns, or suggested alternative language on the proposed amended ID, #2017-006R, <i>Automated Dispatch and Messaging System Requirements</i> .	

Stakeholder Comment Matrix on the following:

- 1) Proposed new COM-001-AB-3, *Communications* (“new COM-001-AB-3”);
- 2) Proposed new COM-002-AB-4, *Operating Personnel Communication Protocols* (“new COM-002-AB-4”);
- 3) Proposed retirement of existing COM-001-AB1-1.1, *Communications* (“existing COM-001-AB1-1.1”);
- 4) Proposed retirement of existing COM-002-AB1-2a, *Operating Personnel Communication Protocols* (“existing COM-002-AB1-2a”); and
- 5) Proposed amended Section 502.4 of the ISO rules, *Automated Dispatch and Messaging System and Voice Communication System Requirements* (“Section 502.4”).

(collectively referred to as the “Communication ISO Rule and Reliability Standards”)



Date of Request for Comment: <u>July 27, 2022</u>	Contact: <u>Rajveen Gill</u>
Period of Comment: <u>July 27, 2022</u> through <u>August 19, 2022</u>	Phone: <u>780-412-3435</u>
Comments From: <u>EPCOR Distribution &amp; Transmission Inc.</u>	Email: <u>rgill@epcor.com</u>
Date: <u>[2022/08/19]</u>	

Instructions:

1. Please fill out the section above as indicated.
2. Please refer back to the Consultation Letter under the “Consultation Letter Materials” section to view materials related to the Communication ISO Rule and Reliability Standards.
3. Please respond to the questions below and provide your specific comments, proposed revisions, and reasons for your position underneath (if any). Blank boxes will be interpreted as favourable comments.
4. Please be advised that general comments do not give the AESO any specific issue to consider and address, and results in a general response.

**The AESO is seeking comments from Stakeholders on the Communication ISO Rule and Reliability Standards with regard to the following matters:**

AESO Questions to Stakeholders: Proposed New COM-001-AB-3	Stakeholder Comments and/or Alternative Proposal
1. Are there any requirements contained in the proposed new COM-001-AB-3 that are not clearly articulated? If yes, please indicate the specific section of the proposed new COM-001-AB-3, describe the concern, and suggest alternative language.	Insert Comments / Reason for Position (if any) EDTI seeks clarity regarding the applicability of the proposed COM-001-AB-3. Specifically, (b) states the following: <p style="text-align: center;">“the operator of an electric distribution system that is directly connected to the transmission system or to transmission facilities</p>

Stakeholder Comment Matrix on the following:

- 1) Proposed new COM-001-AB-3, *Communications* (“new COM-001-AB-3”);
- 2) Proposed new COM-002-AB-4, *Operating Personnel Communication Protocols* (“new COM-002-AB-4”);
- 3) Proposed retirement of existing COM-001-AB1-1.1, *Communications* (“existing COM-001-AB1-1.1”);
- 4) Proposed retirement of existing COM-002-AB1-2a, *Operating Personnel Communication Protocols* (“existing COM-002-AB1-2a”); and
- 5) Proposed amended Section 502.4 of the ISO rules, *Automated Dispatch and Messaging System and Voice Communication System Requirements* (“Section 502.4”).

(collectively referred to as the “Communication ISO Rule and Reliability Standards”)



AESO Questions to Stakeholders: Proposed New COM-001-AB-3	Stakeholder Comments and/or Alternative Proposal
	<p>within the City of Medicine Hat”</p> <p>When is an electric distribution system considered directly connected to the transmission system?</p> <p>EDTI requests clarity on R14.A1. Specifically, EDTI request clarity on the wording ‘use a satellite network system, as approved by the ISO.’ As written, it is not clear how approval from the ISO is sought or obtained. In addition, once approved, will approval need to be obtained again if the system the market participants utilizes changes?</p>
2. Do you have any additional comments regarding the proposed new COM-001-AB-3? If yes, please specify.	EDTI does not have any further comments regarding the proposed new COM-001-AB-3.
3. Please provide any comments, concerns, or suggested alternative language on the proposed amended information document, ID #2012-001RS, <i>Communications</i> .	EDTI suggests adding guidance on R14.A1 into ID #2021-001RS. Specifically, EDTI suggests adding guidance on how approval is sought and obtained from the ISO.
4. Do you agree that the proposed new COM-001-AB-3 is not technically deficient? If not, why.	EDTI agrees that the proposed new COM-001-AB-3 is not technically deficient.
5. Do you agree that the proposed new COM-001-AB-3 supports the public interest? If not, why?	EDTI agrees that the proposed new COM-001-AB-3 supports the public interest.
6. If approved, the AESO will propose an effective date of 3 calendar quarters after Commission approval. Do you agree? If not, why not?	EDTI has no concerns with the proposed effective date of COM-001-AB-3.

Stakeholder Comment Matrix on the following:

- 1) Proposed new COM-001-AB-3, *Communications* (“new COM-001-AB-3”);
- 2) Proposed new COM-002-AB-4, *Operating Personnel Communication Protocols* (“new COM-002-AB-4”);
- 3) Proposed retirement of existing COM-001-AB1-1.1, *Communications* (“existing COM-001-AB1-1.1”);
- 4) Proposed retirement of existing COM-002-AB1-2a, *Operating Personnel Communication Protocols* (“existing COM-002-AB1-2a”); and
- 5) Proposed amended Section 502.4 of the ISO rules, *Automated Dispatch and Messaging System and Voice Communication System Requirements* (“Section 502.4”).

(collectively referred to as the “Communication ISO Rule and Reliability Standards”)



AESO Questions to Stakeholders: Proposed New COM-002-AB-4	Stakeholder Comments and/or Alternative Proposal
1. Are there any requirements contained in the proposed new COM-002-AB-4 that are not clearly articulated? If yes, please indicate the specific section of the proposed new COM-002-AB-4, describe the concern and suggest alternative language.	Insert Comments / Reason for Position (if any) EDTI has no concerns with the requirements listed in the proposed COM-002-AB-4.
2. Do you have any additional comments regarding the proposed new COM-002-AB-4? If yes, please specify.	EDTI has no additional comments at this time.
3. Please provide any comments, concerns, or suggested alternative language on the proposed new information document, ID #2022-001, <i>Operating Personnel Communication Protocols</i> .	EDTI has no additional comments at this time.
4. Do you agree that the proposed new COM-002-AB-4 is not technically deficient? If not, why.	EDTI agrees that the proposed new COM-002-AB-4 is not technically deficient.
5. Do you agree that the proposed new COM-002-AB-4 supports the public interest? If not, why?	EDTI agrees that the proposed new COM-002-AB-4 supports the public interest.
6. If approved, the AESO will propose an effective date of 3 calendar quarters after Commission approval. Do you agree? If not, why not?	EDTI has no concerns with the proposed effective date of COM-002-AB-4.

AESO Questions to Stakeholders: Proposed Retirement of Existing COM-001-AB1-1.1	Stakeholder Comments and/or Alternative Proposal
---	--

Stakeholder Comment Matrix on the following:

- 1) Proposed new COM-001-AB-3, *Communications* (“new COM-001-AB-3”);
- 2) Proposed new COM-002-AB-4, *Operating Personnel Communication Protocols* (“new COM-002-AB-4”);
- 3) Proposed retirement of existing COM-001-AB1-1.1, *Communications* (“existing COM-001-AB1-1.1”);
- 4) Proposed retirement of existing COM-002-AB1-2a, *Operating Personnel Communication Protocols* (“existing COM-002-AB1-2a”); and
- 5) Proposed amended Section 502.4 of the ISO rules, *Automated Dispatch and Messaging System and Voice Communication System Requirements* (“Section 502.4”).

(collectively referred to as the “Communication ISO Rule and Reliability Standards”)



AESO Questions to Stakeholders: Proposed Retirement of Existing COM-001-AB1-1.1	Stakeholder Comments and/or Alternative Proposal
1. Do you have any concerns with the proposed retirement of the existing COM-001-AB1-1.1? If yes, please specify.	Insert Comments / Reason for Position (if any) EDTI has no concerns with the proposed retirement of the existing COM-001-AB1-1.1.

AESO Questions to Stakeholders: Proposed Retirement of Existing COM-002-AB1-2a	Stakeholder Comments and/or Alternative Proposal
1. Do you have any concerns with the proposed retirement of the existing COM-002-AB1-2a? If yes, please specify.	Insert Comments / Reason for Position (if any) EDTI has no concerns with the proposed retirement of the existing COM-002-AB1-2a.

AESO Questions to Stakeholders: Proposed Amended Section 502.4	Stakeholder Comments and/or Alternative Proposal
1. Do you understand and agree with the objective or purpose of the proposed amended Section 502.4 and whether, in your view, the proposed amended Section 502.4 meets the objective or purpose? If not, why.	Insert Comments / Reason for Position (if any) EDTI understands and agrees with the objective and purpose of the proposed amended Section 502.4.
2. Do you agree that the proposed amended Section 502.4 is not technically deficient? If not, why.	EDTI agrees that the proposed amended Section 502.4 is not technically deficient.

Stakeholder Comment Matrix on the following:

- 1) Proposed new COM-001-AB-3, *Communications* (“new COM-001-AB-3”);
- 2) Proposed new COM-002-AB-4, *Operating Personnel Communication Protocols* (“new COM-002-AB-4”);
- 3) Proposed retirement of existing COM-001-AB1-1.1, *Communications* (“existing COM-001-AB1-1.1”);
- 4) Proposed retirement of existing COM-002-AB1-2a, *Operating Personnel Communication Protocols* (“existing COM-002-AB1-2a”); and
- 5) Proposed amended Section 502.4 of the ISO rules, *Automated Dispatch and Messaging System and Voice Communication System Requirements* (“Section 502.4”).

(collectively referred to as the “Communication ISO Rule and Reliability Standards”)



AESO Questions to Stakeholders: Proposed Amended Section 502.4	Stakeholder Comments and/or Alternative Proposal
3. Do you agree with the proposed amended Section 502.4, taken together with all ISO rules and reliability standards, supports a fair, efficient, and openly competitive market? If not, why?	EDTI agrees that the proposed amended Section 502.4 taken together with all ISO rules and reliability standards, supports a fair, efficient, and openly competitive market.
4. Do you agree that the proposed amended Section 502.4 supports the public interest? If not, why?	EDTI agrees that the proposed amended Section 502.4 supports the public interest.
5. If approved, the AESO will propose an effective date of 3 calendar quarters after Commission approval. Do you agree? If not, why not?	EDTI has no concerns with the proposed effective date of Section 502.4.
6. Any additional comments regarding the proposed amended Section 502.4?	EDTI has no additional comments at this time.
7. Please provide any comments, concerns, or suggested alternative language on the proposed amended ID, #2017-006R, <i>Automated Dispatch and Messaging System Requirements</i> .	EDTI has no additional comments at this time.

Stakeholder Comment Matrix on the following:

Proposed new COM-001-AB-3, *Communications* (“new COM-001-AB-3”);

Proposed new COM-002-AB-4, *Operating Personnel Communication Protocols* (“new COM-002-AB-4”);

Proposed retirement of existing COM-001-AB1-1.1, *Communications* (“existing COM-001-AB1-1.1”);

Proposed retirement of existing COM-002-AB1-2a, *Operating Personnel Communication Protocols* (“existing COM-002-AB1-2a”); and

Proposed amended Section 502.4 of the ISO rules, *Automated Dispatch and Messaging System and Voice Communication System Requirements* (“Section 502.4”).

(collectively referred to as the “Communication ISO Rule and Reliability Standards”)



Date of Request for Comment:	July 27, 2022	Contact:	Colleen Krahn
Period of Comment:	July 27, 2022 through August 19, 2022	Phone:	587.943.1086
Comments From:	Heartland Generation Ltd.	Email:	Colleen.krahn@heartlandgeneration.com
Date:	2022/08/18		

Instructions:

1. Please fill out the section above as indicated.
2. Please refer back to the Consultation Letter under the “Consultation Letter Materials” section to view materials related to the Communication ISO Rule and Reliability Standards.
3. Please respond to the questions below and provide your specific comments, proposed revisions, and reasons for your position underneath (if any). Blank boxes will be interpreted as favourable comments.
4. Please be advised that general comments do not give the AESO any specific issue to consider and address, and results in a general response.

**The AESO is seeking comments from Stakeholders on the Communication ISO Rule and Reliability Standards with regard to the following matters:**

AESO Questions to Stakeholders: Proposed New COM-001-AB-3	Stakeholder Comments and/or Alternative Proposal
1. Are there any requirements contained in the proposed new COM-001-AB-3 that are not clearly articulated? If yes, please indicate the specific section of the proposed new COM-001-AB-3, describe the concern, and suggest	No

Stakeholder Comment Matrix on the following:

Proposed new COM-001-AB-3, *Communications* (“new COM-001-AB-3”);

Proposed new COM-002-AB-4, *Operating Personnel Communication Protocols* (“new COM-002-AB-4”);

Proposed retirement of existing COM-001-AB1-1.1, *Communications* (“existing COM-001-AB1-1.1”);

Proposed retirement of existing COM-002-AB1-2a, *Operating Personnel Communication Protocols* (“existing COM-002-AB1-2a”); and

Proposed amended Section 502.4 of the ISO rules, *Automated Dispatch and Messaging System and Voice Communication System Requirements* (“Section 502.4”).

(collectively referred to as the “Communication ISO Rule and Reliability Standards”)



AESO Questions to Stakeholders: Proposed New COM-001-AB-3	Stakeholder Comments and/or Alternative Proposal
alternative language.	
2. Do you have any additional comments regarding the proposed new COM-001-AB-3? If yes, please specify.	The RSAW should be released as soon as possible, before the AUC submission.
3. Please provide any comments, concerns, or suggested alternative language on the proposed amended information document, ID #2012-001RS, <i>Communications</i> .	None.
4. Do you agree that the proposed new COM-001-AB-3 is not technically deficient? If not, why.	We believe that it is technically sufficient from a transmission perspective.
5. Do you agree that the proposed new COM-001-AB-3 supports the public interest? If not, why?	Yes, communication is very important for the public; the standard and the ID clearly support the framework for entities to build and support a reliable communication system with the AESO.
6. If approved, the AESO will propose an effective date of 3 calendar quarters after Commission approval. Do you agree? If not, why not?	An effective date of four calendar quarters to ensure technical recommendations and requirements can be implemented.

AESO Questions to Stakeholders: Proposed New COM-002-AB-4	Stakeholder Comments and/or Alternative Proposal
1. Are there any requirements contained in the proposed new COM-002-AB-4 that are not clearly articulated? If yes, please indicate the specific section of the proposed	Yes, as with COM-001 does COM-002 have a similar exemption for the operator of a transmission facility, as referenced in Appendix 1 of COM-001 (1 (b)) “that only operates a radial circuit at the control room or only operates a



Stakeholder Comment Matrix on the following:

Proposed new COM-001-AB-3, *Communications* (“new COM-001-AB-3”);

Proposed new COM-002-AB-4, *Operating Personnel Communication Protocols* (“new COM-002-AB-4”);

Proposed retirement of existing COM-001-AB1-1.1, *Communications* (“existing COM-001-AB1-1.1”);

Proposed retirement of existing COM-002-AB1-2a, *Operating Personnel Communication Protocols* (“existing COM-002-AB1-2a”); and

Proposed amended Section 502.4 of the ISO rules, *Automated Dispatch and Messaging System and Voice Communication System Requirements* (“Section 502.4”).

(collectively referred to as the “Communication ISO Rule and Reliability Standards”)



AESO Questions to Stakeholders: Proposed New COM-002-AB-4	Stakeholder Comments and/or Alternative Proposal
new COM-002-AB-4, describe the concern and suggest alternative language.	transmission facility identified in a list the ISO publishes on the AESO website”.
2. Do you have any additional comments regarding the proposed new COM-002-AB-4? If yes, please specify.	Release of an RSAW as soon as possible and before the AUC submission.
3. Please provide any comments, concerns, or suggested alternative language on the proposed new information document, ID #2022-001, <i>Operating Personnel Communication Protocols</i> .	ID is clear on protocols.
4. Do you agree that the proposed new COM-002-AB-4 is not technically deficient? If not, why.	Clarification for R6 the NERC standard states in R6, <i>“Each Balancing Authority, Distribution Provider, Generator Operator, and Transmission Operator that receives an oral two-party, person-to-person Operating Instruction during an <b>Emergency</b>, excluding written or oral single-party to multiple party burst Operating Instructions, shall either: [Violation Risk Factor: High][Time Horizon: Real-time Operations”</i> . Should the AESO standard have the same verbiage?
5. Do you agree that the proposed new COM-002-AB-4 supports the public interest? If not, why?	Yes.
6. If approved, the AESO will propose an effective date of 3 calendar quarters after Commission approval. Do you agree? If not, why not?	An effective date of four calendar quarters ensures technical recommendations and requirements can be implemented.

Stakeholder Comment Matrix on the following:

Proposed new COM-001-AB-3, *Communications* (“new COM-001-AB-3”);

Proposed new COM-002-AB-4, *Operating Personnel Communication Protocols* (“new COM-002-AB-4”);

Proposed retirement of existing COM-001-AB1-1.1, *Communications* (“existing COM-001-AB1-1.1”);

Proposed retirement of existing COM-002-AB1-2a, *Operating Personnel Communication Protocols* (“existing COM-002-AB1-2a”); and

Proposed amended Section 502.4 of the ISO rules, *Automated Dispatch and Messaging System and Voice Communication System Requirements* (“Section 502.4”).

(collectively referred to as the “Communication ISO Rule and Reliability Standards”)



AESO Questions to Stakeholders: Proposed Retirement of Existing COM-001-AB1-1.1	Stakeholder Comments and/or Alternative Proposal
1. Do you have any concerns with the proposed retirement of the existing COM-001-AB1-1.1? If yes, please specify.	No

AESO Questions to Stakeholders: Proposed Retirement of Existing COM-002-AB1-2a	Stakeholder Comments and/or Alternative Proposal
1. Do you have any concerns with the proposed retirement of the existing COM-002-AB1-2a? If yes, please specify.	No

AESO Questions to Stakeholders: Proposed Amended Section 502.4	Stakeholder Comments and/or Alternative Proposal
1. Do you understand and agree with the objective or purpose of the proposed amended Section 502.4 and whether, in your view, the proposed amended Section 502.4 meets the objective or purpose? If not, why.	Yes
2. Do you agree that the proposed amended Section 502.4 is not technically deficient? If not, why.	Yes
3. Do you agree with the proposed amended Section 502.4, taken together with all ISO rules and reliability standards, supports a fair, efficient, and openly	Yes,

Stakeholder Comment Matrix on the following:

Proposed new COM-001-AB-3, *Communications* (“new COM-001-AB-3”);

Proposed new COM-002-AB-4, *Operating Personnel Communication Protocols* (“new COM-002-AB-4”);

Proposed retirement of existing COM-001-AB1-1.1, *Communications* (“existing COM-001-AB1-1.1”);

Proposed retirement of existing COM-002-AB1-2a, *Operating Personnel Communication Protocols* (“existing COM-002-AB1-2a”); and

Proposed amended Section 502.4 of the ISO rules, *Automated Dispatch and Messaging System and Voice Communication System Requirements* (“Section 502.4”).

(collectively referred to as the “Communication ISO Rule and Reliability Standards”)



AESO Questions to Stakeholders: Proposed Amended Section 502.4	Stakeholder Comments and/or Alternative Proposal
competitive market? If not, why?	
4. Do you agree that the proposed amended Section 502.4 supports the public interest? If not, why?	Yes
5. If approved, the AESO will propose an effective date of 3 calendar quarters after Commission approval. Do you agree? If not, why not?	Yes
6. Any additional comments regarding the proposed amended Section 502.4?	None
7. Please provide any comments, concerns, or suggested alternative language on the proposed amended ID, #2017-006R, <i>Automated Dispatch and Messaging System Requirements</i> .	None

**Stakeholder Comment Matrix on the following:**

- 1) Proposed new COM-001-AB-3, *Communications* (“new COM-001-AB-3”);
- 2) Proposed new COM-002-AB-4, *Operating Personnel Communication Protocols* (“new COM-002-AB-4”);
- 3) Proposed retirement of existing COM-001-AB1-1.1, *Communications* (“existing COM-001-AB1-1.1”);
- 4) Proposed retirement of existing COM-002-AB1-2a, *Operating Personnel Communication Protocols* (“existing COM-002-AB1-2a”); and
- 5) Proposed amended Section 502.4 of the ISO rules, *Automated Dispatch and Messaging System and Voice Communication System Requirements* (“Section 502.4”).

(collectively referred to as the “Communication ISO Rule and Reliability Standards”)



Date of Request for Comment: <u>July 27, 2022</u>	Contact: <u>Hameed Zaman</u>
Period of Comment: <u>July 27, 2022</u> through <u>August 19, 2022</u>	Phone: <u>403-920-6703</u>
Comments From: <u>TC Energy</u>	Email: _____
Date: <u>2022/08/19</u>	

**Instructions:**

1. Please fill out the section above as indicated.
2. Please refer back to the Consultation Letter under the “Consultation Letter Materials” section to view materials related to the Communication ISO Rule and Reliability Standards.
3. Please respond to the questions below and provide your specific comments, proposed revisions, and reasons for your position underneath (if any). Blank boxes will be interpreted as favourable comments.
4. Please be advised that general comments do not give the AESO any specific issue to consider and address, and results in a general response.

**The AESO is seeking comments from Stakeholders on the Communication ISO Rule and Reliability Standards with regard to the following matters:**

AESO Questions to Stakeholders: Proposed New COM-001-AB-3	Stakeholder Comments and/or Alternative Proposal
1. Are there any requirements contained in the proposed new COM-001-AB-3 that are not clearly articulated? If yes, please indicate the specific section of the proposed new COM-001-AB-3, describe the concern, and suggest alternative language.	Insert Comments / Reason for Position (if any)

Stakeholder Comment Matrix on the following:

- 1) Proposed new COM-001-AB-3, *Communications* (“new COM-001-AB-3”);
- 2) Proposed new COM-002-AB-4, *Operating Personnel Communication Protocols* (“new COM-002-AB-4”);
- 3) Proposed retirement of existing COM-001-AB1-1.1, *Communications* (“existing COM-001-AB1-1.1”);
- 4) Proposed retirement of existing COM-002-AB1-2a, *Operating Personnel Communication Protocols* (“existing COM-002-AB1-2a”); and
- 5) Proposed amended Section 502.4 of the ISO rules, *Automated Dispatch and Messaging System and Voice Communication System Requirements* (“Section 502.4”).

(collectively referred to as the “Communication ISO Rule and Reliability Standards”)



AESO Questions to Stakeholders: Proposed New COM-001-AB-3	Stakeholder Comments and/or Alternative Proposal
<p>2. Do you have any additional comments regarding the proposed new COM-001-AB-3? If yes, please specify.</p>	<p>TC Energy thanks the AESO for the opportunity to provide comments on this initiative. TC Energy also appreciates the Comparison Rationale Matrix published by the AESO as it makes it easier to understand the proposed standards and rule changes.</p> <p>TC Energy doesn't have concerns with requirements in COM-001-AB-3 that coincide with requirements in NERC's COM-001-3. However, TC Energy objects to the inclusion of technical requirements from ISO Rules as part of Alberta Reliability Standards (ARS).</p> <p>The AESO's approach prior to this consultation has been to <u>not</u> adopt a NERC standard or requirement if the requirement is covered under an existing AESO rule. The AESO seems to be taking the opposite approach in this case and moving ISO Rule requirements into ARS. Market participants are aware that technical requirements are part of Division 502 of the ISO rules and TCE is of the view this is where the communication system technical requirements should reside to remain consistent with the AESO's historical approach and the structure of the Authoritative Documents.</p> <p>TC Energy is of the understanding that both the ISO Rules and the ARS create an equivalent obligation for market participants to comply. However, compliance with Alberta Reliability Standards places a greater administrative burden on all applicable market participants due to compliance activities associated with annual self-certifications and triennial audits. While the ISO Rules are not audited, the AESO has the ability to conduct compliance monitoring and request information from market participants under ISO Rule 103.12, <i>Compliance Monitoring</i>, as the AESO has done in the past with respect to other technical requirements.</p> <p>Given the equivalent compliance obligation between ISO Rules and the ARS,</p>

Stakeholder Comment Matrix on the following:

- 1) Proposed new COM-001-AB-3, *Communications* (“new COM-001-AB-3”);
- 2) Proposed new COM-002-AB-4, *Operating Personnel Communication Protocols* (“new COM-002-AB-4”);
- 3) Proposed retirement of existing COM-001-AB1-1.1, *Communications* (“existing COM-001-AB1-1.1”);
- 4) Proposed retirement of existing COM-002-AB1-2a, *Operating Personnel Communication Protocols* (“existing COM-002-AB1-2a”); and
- 5) Proposed amended Section 502.4 of the ISO rules, *Automated Dispatch and Messaging System and Voice Communication System Requirements* (“Section 502.4”).

(collectively referred to as the “Communication ISO Rule and Reliability Standards”)



AESO Questions to Stakeholders: Proposed New COM-001-AB-3	Stakeholder Comments and/or Alternative Proposal
	the more efficient option would be to choose the option that reduces administrative burden for market participants and maintains the structure of the AESO’s Authoritative Documents. TC Energy recommends that the AESO maintains the communication system technical requirements as part of ISO Rules Division 502 instead of the ARS.
3. Please provide any comments, concerns, or suggested alternative language on the proposed amended information document, ID #2012-001RS, <i>Communications</i> .	
4. Do you agree that the proposed new COM-001-AB-3 is not technically deficient? If not, why.	
5. Do you agree that the proposed new COM-001-AB-3 supports the public interest? If not, why?	
6. If approved, the AESO will propose an effective date of 3 calendar quarters after Commission approval. Do you agree? If not, why not?	

AESO Questions to Stakeholders: Proposed New COM-002-AB-4	Stakeholder Comments and/or Alternative Proposal
1. Are there any requirements contained in the proposed new COM-002-AB-4 that are not clearly articulated? If	Insert Comments / Reason for Position (if any)

Stakeholder Comment Matrix on the following:

- 1) Proposed new COM-001-AB-3, *Communications* (“new COM-001-AB-3”);
- 2) Proposed new COM-002-AB-4, *Operating Personnel Communication Protocols* (“new COM-002-AB-4”);
- 3) Proposed retirement of existing COM-001-AB1-1.1, *Communications* (“existing COM-001-AB1-1.1”);
- 4) Proposed retirement of existing COM-002-AB1-2a, *Operating Personnel Communication Protocols* (“existing COM-002-AB1-2a”); and
- 5) Proposed amended Section 502.4 of the ISO rules, *Automated Dispatch and Messaging System and Voice Communication System Requirements* (“Section 502.4”).

(collectively referred to as the “Communication ISO Rule and Reliability Standards”)



AESO Questions to Stakeholders: Proposed New COM-002-AB-4	Stakeholder Comments and/or Alternative Proposal
yes, please indicate the specific section of the proposed new COM-002-AB-4, describe the concern and suggest alternative language.	
2. Do you have any additional comments regarding the proposed new COM-002-AB-4? If yes, please specify.	
3. Please provide any comments, concerns, or suggested alternative language on the proposed new information document, ID #2022-001, <i>Operating Personnel Communication Protocols</i> .	
4. Do you agree that the proposed new COM-002-AB-4 is not technically deficient? If not, why.	
5. Do you agree that the proposed new COM-002-AB-4 supports the public interest? If not, why?	
6. If approved, the AESO will propose an effective date of 3 calendar quarters after Commission approval. Do you agree? If not, why not?	

AESO Questions to Stakeholders: Proposed Retirement of Existing COM-001-AB1-1.1	Stakeholder Comments and/or Alternative Proposal
1. Do you have any concerns with the proposed retirement of the existing COM-001-AB1-1.1? If yes, please specify.	Insert Comments / Reason for Position (if any)



Stakeholder Comment Matrix on the following:

- 1) Proposed new COM-001-AB-3, *Communications* (“new COM-001-AB-3”);
- 2) Proposed new COM-002-AB-4, *Operating Personnel Communication Protocols* (“new COM-002-AB-4”);
- 3) Proposed retirement of existing COM-001-AB1-1.1, *Communications* (“existing COM-001-AB1-1.1”);
- 4) Proposed retirement of existing COM-002-AB1-2a, *Operating Personnel Communication Protocols* (“existing COM-002-AB1-2a”); and
- 5) Proposed amended Section 502.4 of the ISO rules, *Automated Dispatch and Messaging System and Voice Communication System Requirements* (“Section 502.4”).

(collectively referred to as the “Communication ISO Rule and Reliability Standards”)



AESO Questions to Stakeholders: Proposed Retirement of Existing COM-002-AB1-2a	Stakeholder Comments and/or Alternative Proposal
1. Do you have any concerns with the proposed retirement of the existing COM-002-AB1-2a? If yes, please specify.	Insert Comments / Reason for Position (if any)

AESO Questions to Stakeholders: Proposed Amended Section 502.4	Stakeholder Comments and/or Alternative Proposal
1. Do you understand and agree with the objective or purpose of the proposed amended Section 502.4 and whether, in your view, the proposed amended Section 502.4 meets the objective or purpose? If not, why.	Insert Comments / Reason for Position (if any)
2. Do you agree that the proposed amended Section 502.4 is not technically deficient? If not, why.	
3. Do you agree with the proposed amended Section 502.4, taken together with all ISO rules and reliability standards, supports a fair, efficient, and openly competitive market? If not, why?	
4. Do you agree that the proposed amended Section 502.4 supports the public interest? If not, why?	
5. If approved, the AESO will propose an effective date of	

Stakeholder Comment Matrix on the following:

- 1) Proposed new COM-001-AB-3, *Communications* (“new COM-001-AB-3”);
- 2) Proposed new COM-002-AB-4, *Operating Personnel Communication Protocols* (“new COM-002-AB-4”);
- 3) Proposed retirement of existing COM-001-AB1-1.1, *Communications* (“existing COM-001-AB1-1.1”);
- 4) Proposed retirement of existing COM-002-AB1-2a, *Operating Personnel Communication Protocols* (“existing COM-002-AB1-2a”); and
- 5) Proposed amended Section 502.4 of the ISO rules, *Automated Dispatch and Messaging System and Voice Communication System Requirements* (“Section 502.4”).

(collectively referred to as the “Communication ISO Rule and Reliability Standards”)



AESO Questions to Stakeholders: Proposed Amended Section 502.4	Stakeholder Comments and/or Alternative Proposal
3 calendar quarters after Commission approval. Do you agree? If not, why not?	
6. Any additional comments regarding the proposed amended Section 502.4?	
7 Please provide any comments, concerns, or suggested alternative language on the proposed amended ID, #2017-006R, <i>Automated Dispatch and Messaging System Requirements</i> .	

Stakeholder Comment Matrix on the following:

- 1) Proposed new COM-001-AB-3, *Communications* (“new COM-001-AB-3”);
- 2) Proposed new COM-002-AB-4, *Operating Personnel Communication Protocols* (“new COM-002-AB-4”);
- 3) Proposed retirement of existing COM-001-AB1-1.1, *Communications* (“existing COM-001-AB1-1.1”);
- 4) Proposed retirement of existing COM-002-AB1-2a, *Operating Personnel Communication Protocols* (“existing COM-002-AB1-2a”); and
- 5) Proposed amended Section 502.4 of the ISO rules, *Automated Dispatch and Messaging System and Voice Communication System Requirements* (“Section 502.4”).

(collectively referred to as the “Communication ISO Rule and Reliability Standards”)



Date of Request for Comment:	July 27, 2022	Contact:	Prithvi Nandy
Period of Comment:	July 27, 2022 through August 19, 2022	Phone:	780-446-3832
Comments From:	TransAlta	Email:	Prithvi_Nandy@transalta.com
Date:	2022/08/19		

Instructions:

1. Please fill out the section above as indicated.
2. Please refer back to the Consultation Letter under the “Consultation Letter Materials” section to view materials related to the Communication ISO Rule and Reliability Standards.
3. Please respond to the questions below and provide your specific comments, proposed revisions, and reasons for your position underneath (if any). Blank boxes will be interpreted as favourable comments.
4. Please be advised that general comments do not give the AESO any specific issue to consider and address, and results in a general response.

**The AESO is seeking comments from Stakeholders on the Communication ISO Rule and Reliability Standards with regard to the following matters:**

AESO Questions to Stakeholders: Proposed New COM-001-AB-3	Stakeholder Comments and/or Alternative Proposal
1. Are there any requirements contained in the proposed new COM-001-AB-3 that are not clearly articulated? If yes, please indicate the specific section of the	TransAlta requests that the AESO provides definitions for “public telephone network” and “direct access telephone service” as stated in R3.A1, R7.A1 etc.

Stakeholder Comment Matrix on the following:

- 1) Proposed new COM-001-AB-3, *Communications* (“new COM-001-AB-3”);
- 2) Proposed new COM-002-AB-4, *Operating Personnel Communication Protocols* (“new COM-002-AB-4”);
- 3) Proposed retirement of existing COM-001-AB1-1.1, *Communications* (“existing COM-001-AB1-1.1”);
- 4) Proposed retirement of existing COM-002-AB1-2a, *Operating Personnel Communication Protocols* (“existing COM-002-AB1-2a”); and
- 5) Proposed amended Section 502.4 of the ISO rules, *Automated Dispatch and Messaging System and Voice Communication System Requirements* (“Section 502.4”).

(collectively referred to as the “Communication ISO Rule and Reliability Standards”)



AESO Questions to Stakeholders: Proposed New COM-001-AB-3	Stakeholder Comments and/or Alternative Proposal
proposed new COM-001-AB-3, describe the concern, and suggest alternative language.	
2. Do you have any additional comments regarding the proposed new COM-001-AB-3? If yes, please specify.	TransAlta notes the marked departure from NERC’s approach to the applicability of Reliability Standards, which is based on the definition of BES. TransAlta proposes that the applicability of ARS to be based on generating units’ connection to the BES.
3. Please provide any comments, concerns, or suggested alternative language on the proposed amended information document, ID #2012-001RS, <i>Communications</i> .	No Comment
4. Do you agree that the proposed new COM-001-AB-3 is not technically deficient? If not, why.	TransAlta Agrees.
5. Do you agree that the proposed new COM-001-AB-3 supports the public interest? If not, why?	TransAlta Agrees.
6. If approved, the AESO will propose an effective date of 3 calendar quarters after Commission approval. Do you agree? If not, why not?	TransAlta Agrees.

Stakeholder Comment Matrix on the following:

- 1) Proposed new COM-001-AB-3, *Communications* (“new COM-001-AB-3”);
- 2) Proposed new COM-002-AB-4, *Operating Personnel Communication Protocols* (“new COM-002-AB-4”);
- 3) Proposed retirement of existing COM-001-AB1-1.1, *Communications* (“existing COM-001-AB1-1.1”);
- 4) Proposed retirement of existing COM-002-AB1-2a, *Operating Personnel Communication Protocols* (“existing COM-002-AB1-2a”); and
- 5) Proposed amended Section 502.4 of the ISO rules, *Automated Dispatch and Messaging System and Voice Communication System Requirements* (“Section 502.4”).

(collectively referred to as the “Communication ISO Rule and Reliability Standards”)



AESO Questions to Stakeholders: Proposed New COM-002-AB-4	Stakeholder Comments and/or Alternative Proposal
1. Are there any requirements contained in the proposed new COM-002-AB-4 that are not clearly articulated? If yes, please indicate the specific section of the proposed new COM-002-AB-4, describe the concern and suggest alternative language.	No Comment
2. Do you have any additional comments regarding the proposed new COM-002-AB-4? If yes, please specify.	TransAlta notes that COM-002-AB-4 uses the term “operating instructions” whereas VAR-002-AB-4.1 uses the term “instructions” only. TransAlta requests clarity on whether or not the “instructions” as per VAR-002-AB-4.1 would be considered as “operating instructions” in COM-002-AB-4. If “instructions” related to VAR-002-AB-4.1 are considered COM-002-AB-4 “operating instructions”, TransAlta requests that the “instructions” related to VAR-002-AB-4.1 standard be excluded from COM-002-AB-4 “operating instructions” as Operators may receive multiple “instructions” related to VAR-002-AB-4.1 on a regular basis. In addition, TransAlta suggests that R6 be narrowed similar to NERC to only be applicable during an emergency.
3. Please provide any comments, concerns, or suggested alternative language on the proposed new information document, ID #2022-001, <i>Operating Personnel Communication Protocols</i> .	No Comment
4. Do you agree that the proposed new COM-002-AB-4 is not technically deficient? If not, why.	TransAlta Agrees.
5. Do you agree that the proposed new COM-002-AB-4 supports the public interest? If not, why?	TransAlta Agrees.

Stakeholder Comment Matrix on the following:

- 1) Proposed new COM-001-AB-3, *Communications* (“new COM-001-AB-3”);
- 2) Proposed new COM-002-AB-4, *Operating Personnel Communication Protocols* (“new COM-002-AB-4”);
- 3) Proposed retirement of existing COM-001-AB1-1.1, *Communications* (“existing COM-001-AB1-1.1”);
- 4) Proposed retirement of existing COM-002-AB1-2a, *Operating Personnel Communication Protocols* (“existing COM-002-AB1-2a”); and
- 5) Proposed amended Section 502.4 of the ISO rules, *Automated Dispatch and Messaging System and Voice Communication System Requirements* (“Section 502.4”).

(collectively referred to as the “Communication ISO Rule and Reliability Standards”)



AESO Questions to Stakeholders: Proposed New COM-002-AB-4	Stakeholder Comments and/or Alternative Proposal
6. If approved, the AESO will propose an effective date of 3 calendar quarters after Commission approval. Do you agree? If not, why not?	TransAlta Agrees.

AESO Questions to Stakeholders: Proposed Retirement of Existing COM-001-AB1-1.1	Stakeholder Comments and/or Alternative Proposal
1. Do you have any concerns with the proposed retirement of the existing COM-001-AB1-1.1? If yes, please specify.	No concerns.

AESO Questions to Stakeholders: Proposed Retirement of Existing COM-002-AB1-2a	Stakeholder Comments and/or Alternative Proposal
1. Do you have any concerns with the proposed retirement of the existing COM-002-AB1-2a? If yes, please specify.	No concerns.

Stakeholder Comment Matrix on the following:

- 1) Proposed new COM-001-AB-3, *Communications* (“new COM-001-AB-3”);
- 2) Proposed new COM-002-AB-4, *Operating Personnel Communication Protocols* (“new COM-002-AB-4”);
- 3) Proposed retirement of existing COM-001-AB1-1.1, *Communications* (“existing COM-001-AB1-1.1”);
- 4) Proposed retirement of existing COM-002-AB1-2a, *Operating Personnel Communication Protocols* (“existing COM-002-AB1-2a”); and
- 5) Proposed amended Section 502.4 of the ISO rules, *Automated Dispatch and Messaging System and Voice Communication System Requirements* (“Section 502.4”).

(collectively referred to as the “Communication ISO Rule and Reliability Standards”)



AESO Questions to Stakeholders: Proposed Amended Section 502.4	Stakeholder Comments and/or Alternative Proposal
1. Do you understand and agree with the objective or purpose of the proposed amended Section 502.4 and whether, in your view, the proposed amended Section 502.4 meets the objective or purpose? If not, why.	TransAlta understands the objective and agrees the change meets the objective. However, TransAlta generally prefers ISO Rules are used to address variations from the NERC standard and suggests perhaps the requirements that were moved to COM-001-AB-3 could be moved to a new ISO Rule. The reason for this is that TransAlta’s portfolio includes assets outside of Alberta and the variations from the NERC standard make maintaining our Reliability Standards Compliance Program more challenging.
2. Do you agree that the proposed amended Section 502.4 is not technically deficient? If not, why.	TransAlta agrees.
3. Do you agree with the proposed amended Section 502.4, taken together with all ISO rules and reliability standards, supports a fair, efficient, and openly competitive market? If not, why?	TransAlta agrees.
4. Do you agree that the proposed amended Section 502.4 supports the public interest? If not, why?	TransAlta agrees.
5. If approved, the AESO will propose an effective date of 3 calendar quarters after Commission approval. Do you agree? If not, why not?	TransAlta agrees.
6. Any additional comments regarding the proposed amended Section 502.4?	No Comment



Stakeholder Comment Matrix on the following:

- 1) Proposed new COM-001-AB-3, *Communications* (“new COM-001-AB-3”);
- 2) Proposed new COM-002-AB-4, *Operating Personnel Communication Protocols* (“new COM-002-AB-4”);
- 3) Proposed retirement of existing COM-001-AB1-1.1, *Communications* (“existing COM-001-AB1-1.1”);
- 4) Proposed retirement of existing COM-002-AB1-2a, *Operating Personnel Communication Protocols* (“existing COM-002-AB1-2a”); and
- 5) Proposed amended Section 502.4 of the ISO rules, *Automated Dispatch and Messaging System and Voice Communication System Requirements* (“Section 502.4”).

(collectively referred to as the “Communication ISO Rule and Reliability Standards”)



AESO Questions to Stakeholders: Proposed Amended Section 502.4	Stakeholder Comments and/or Alternative Proposal
7 Please provide any comments, concerns, or suggested alternative language on the proposed amended ID, #2017-006R, <i>Automated Dispatch and Messaging System Requirements</i> .	No Comment