

December 15, 2022

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

Re: **Alberta Electric System Operator Reply to Stakeholder Comments 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”)

On July 27, 2022, the Alberta Electric System Operator (“AESO”) issued a consultation letter requesting Stakeholder comments on the Communication ISO Rule and Reliability Standards. In addition, the AESO requested Stakeholder comments on proposed amendments to AESO information documents ID #2012-001RS, *Communications* (“ID #2012-001RS”), ID #2017-006R, *Automated Dispatch and Messaging System Requirements* (“ID #2017-006R”), and proposed new ID #2022-001, *Operating Personnel Communication Protocols* (“ID #2022-001”).

AESO Reply to Stakeholder Comments

On August 26, 2022, the AESO posted written comments from Stakeholders on the Communication ISO Rule and Reliability Standards. The AESO replies to comments, including the rationale or basis for the AESO’s position, are set out in the attached *Stakeholder Comment and AESO Replies Matrix*.

The AESO has made further amendments to COM-001-AB-3, COM-002-AB-4, and proposed amended ID# 2012-001RS and the proposed implementation timeline in response to comments received, including better alignment with NERC and to address grammatical errors. No comments were received from Stakeholders on Section 502.4, proposed new ID #2022-001 and proposed amended ID #2017-006R that warranted further amendments.

Amendments to COM-001-AB-3 and COM-002-AB-4 Applicability

The following amendments were made to the applicability sections in COM-001-AB-3 and COM-002-AB-4:

- In response to Stakeholder feedback, the AESO reassessed the applicability thresholds for operators of generating units and aggregated generating facilities. As described in further detail in the *Stakeholder Comment and AESO Replies Matrix*, COM-001-AB-3 and COM-002-AB-4 will apply at the bulk electric system level to align with NERC. The majority of Alberta generation is part of the bulk electric system. Therefore, the AESO is of the view that it can apply this standard to the bulk electric system generation while maintaining the overall reliability of the interconnected electric system.

Amendments to COM-001-AB-3

The following amendments were made to COM-001-AB-3:

- Requirement R1 and R2: More substantive changes were made to better align with NERC wording and to address Stakeholder feedback. Requirement R1 and R2 are applicable to the AESO only.
- Requirements R2, R4, and R8.A2, Appendix 1, 2, and 3: In response to Stakeholder feedback, the AESO reassessed the backup voice communication system thresholds for operators of generating units and aggregated generating facilities with both the AESO and its operator of a transmission facility. As a result, the AESO removed backup voice communication system requirements in COM-001-AB-3 for operators of generating units' and aggregated generating facilities' control rooms that operate generation with a maximum authorized real power of less than 50 MW.
- Appendix 1: Backup voice communication system requirements were removed for operators of radial circuit transmission facilities. However, these operators will continue to requirement a backup voice communication system with the operator of a transmission facility that they are directly connected to, as set out in Appendix 2.
- Measures MR3, MR7, and MR8 were updated to include the fact that evidence may include "voice communication system design or configuration documentation".
- Administrative amendments were made throughout the COM-001-AB-3 to clarify certain provisions and better align with NERC.

Amendments to COM-002-AB-4

The following amendments were made to COM-002-AB-4:

- Requirements R5, R6, and R7 were amended to align with NERC. Specifically, the phrase "operating instructions during emergency" replaces "directives" in these provisions.
- Since "operating instructions during emergency" can be issued by the AESO and by operators of transmission facilities, operators of transmission facilities have been brought in scope of Requirements R5 and R7, which relate to issuing operating instructions during emergency. In addition, the AESO has been brought in scope of Requirement R6, which relates to receiving operating instructions during emergency.

Proposed Adoption of the AESO's "Emergency" Definition

- "Emergency" definition: The AESO will include in its application to the Alberta Utilities Commission ("Commission"), a request to adopt the existing ISO tariff definition, "emergency" for use in the Alberta Reliability Standards. This definition aligns with the NERC defined term "emergency".

Amendments to ID# 2012-001RS, *Communications*

In addition to changes to the Communication ISO Rule and Reliability Standards, the following amendments were made to the proposed amended ID#2012-001RS:

- Subsection 2.1(c) was amended to clarify that the phrase "*generally remote to the transmission facility or electric distribution system*" refers to the fact that each designated operators of transmission facilities and operators of electric distribution systems typically operate their facility remotely. By contrast, operators of generating units and aggregated generating facilities may operate their facilities in local control rooms.
- Subsection 2.3 was amended to remove the language relating to the operating personnel proximity to the voice communication system. This is an AESO expectation and not a COM-001-AB-3 requirement. This has been removed to reduce any administrative burden on market participants.

- Subsection 4.2 was amended to clarify situations regarding generator control rooms that are not staffed under normal circumstances. In those cases, the operator of a generating unit or aggregated generating facility may initiate their backup voice communication system test when on site.
- Subsection 4.5 has been amended to clarify that Responsible Entities may use a different satellite telephone system apart from the 2 approved satellite systems set out in proposed amended ID#2012-001RS, subject to confirmation by the AESO.

Update on Implementation

The AESO plans to host a Reliability Standard Workshop, to respond to Responsible Entities implementation questions and to review the AESO's draft *Reliability Standards Audit Worksheet*.

In response to Stakeholder feedback, the AESO amended the implementation timeline for the COM-001-AB-3, COM-002-AB-4, and Section 502.4 to the 1st day of the month following 4 full calendar quarters after Commission approval to accommodate an extra calendar quarter.

Application for Approval of the Communication ISO Rule and Reliability Standards

- Forwarding of the Final Communication Reliability Standards

Pursuant to Section 19 of the *Transmission Regulation*, the AESO expects to forward the proposed new reliability standards and retirement of existing reliability standards to the Commission before the end of January 2023, with the AESO's recommendation that the Commission approve proposed new COM-001-AB-3 and COM-002-AB-4 and retire existing COM-001-AB1-1.1 and COM-002-AB1-2a.

- Application for Approval of the Final Proposed Amended Section 502.4

Pursuant to Section 20.2(1) of the *Electric Utilities Act* and Section 6 of the *AUC Rule 017*, the AESO expects to submit its application for the proposed amended Section 502.4 with the Commission before the end of January 2023.

Implementation Timeline

The AESO is now proposing that the Communication ISO Rule and Reliability Standards become effective the 1st day of the month following 4 full calendar quarters after AUC approval. The AESO currently anticipates that assuming a March 2023 approval, the effective date will be April 1, 2024.

AESO Reply Letter Material

The following documents are posted on the AESO's *COM-001-AB-3*, *COM-002-AB-4*, *COM-001-AB1-1.1*, *COM-002-AB1-2a*, and *Section 502.4* webpages:

1. *Stakeholder Comment and AESO Replies Matrix* on the Communication ISO Rule and Reliability Standards;
2. Blackline copy of COM-001-AB-3 – Effective to Final;
3. Blackline copy of COM-001-AB-3 – Consultation to Final;
4. Clean copy of COM-001-AB-3;
5. Blackline copy of COM-002-AB-4 – Effective to Final;
6. Blackline copy of COM-002-AB-4 – Consultation to Final;
7. Clean copy of COM-002-AB-4;
8. Clean copy of the COM-001-AB-3 comparison matrix;
9. Clean copy of the COM-002-AB-4 comparison matrix;
10. Blackline and clean copies of ID #2012-001RS; and

11. Proposed new “emergency” definition.

If you have any questions, please contact the undersigned.

Sincerely,

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