

April 9, 2019

To: Stakeholder and Other Interested Parties

Re: Stakeholder Comments on Consultation Letter

- 1) **New Alberta Reliability Standard:**
 - a) Proposed new Alberta Reliability Standard COM-002-AB-4, *Operating Personnel Communication Protocols* (“new COM-002-AB-4”);
 - 2) **Retirement of Existing Alberta Reliability Standards:**
 - a) Proposed retirement of existing Alberta Reliability Standard COM-002-AB1-2a, *Communications and Coordination* (“existing COM-002-AB1-2a”);
 - b) Proposed retirement of existing Alberta Reliability Standard COM-001-AB1-1.1, *Telecommunications* (“existing COM-001-AB1-1.1”); and
 - 3) **Recommendation to Reject for Adoption North American Electric Reliability Corporation (“NERC”) Reliability Standard:**
 - a) COM-001-3, *Communications* (“NERC COM-001-3”)
- collectively referred to as “COM Standards”

Written comments received from stakeholders in response to the Alberta Electric System Operator’s (“AESO”) March 19, 2019 [Consultation Letter](#) have been posted on the AESO website.

The following grid is hyperlinked to provide assistance in directing you to these written comments:

New COM-002-AB-4
AltaLink Management Ltd.
ATCO Electric Ltd.
EPCOR Distribution & Transmission Inc.
Suncor Energy Inc.

Thank you to all stakeholders who participated in this consultation. All written comments received will be considered in the AESO’s finalization of the proposed COM Standards.

Sincerely,

“Melissa Mitchell-Moisson”

Melissa Mitchell-Moisson
 Regulatory Administrator
 Phone: 403-539-2948
 Email: ars_comments@aes0.ca



Date of Request for Comment: <u>March 19, 2019</u> Period of Comment: <u>March 19, 2019</u> through <u>April 3, 2019</u> Comments From: <u>AltaLink</u> Date [yyyy/mm/dd]: <u>2019/04/03</u>	Contact: <u>Jenette Yearsley</u> Phone: <u>403-387-8275</u> Email: <u>Jenette.Yearsley@AltaLink.ca</u>
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Listed below is the summary description of changes for the proposed new COM-002-AB-4. Please refer back to the Consultation Letter under the “Attachments” section to view materials related to the proposed new COM-002-AB-4. Please place your comments/reasons for position underneath (if any).

Alberta Reliability Standard	Stakeholder Comments and/or Alternative Proposal
<p>New</p> <p>The AESO is seeking comments from stakeholders with regard to the following matters:</p> <ol style="list-style-type: none"> 1. Are there any requirements contained in proposed new COM-002-AB-4 that are not clearly articulated? If yes, please indicate the specific section of proposed new COM-002-AB-4, describe the concern and suggest alternative language. 2. Please provide any additional comments regarding proposed new COM-002-AB-4. 	<p><i>Comment # 1: For R1.6, how is the “nomenclature for system elements” defined/established? Also, AltaLink noticed that the AESO uses “system elements” rather than “Transmission interface Elements and Transmission interface Facilities” that is used in NERC’s COM-002-4. Could the AESO provide some explanation on the change? Does “system element” here have the same meaning as defined in the Consolidated Authoritative Document Glossary?</i></p> <p><i>Comment # 2: For R4.1, should the assessment be based on all members of the operating personnel, or could it be based on sampled members of the operating personnel? Will the AESO develop an Information Document for assessing the adherence to the communication protocol?</i></p> <p><i>Comment # 3: For R4.2, should the assessment be based on all members of the operating personnel, or could it be based on sampled members of the operating personnel? Will the AESO develop an Information Document for assessing the effectiveness of the communication protocol?</i></p>

Proposed retirement of existing Alberta Reliability Standard COM-002-AB1-2a, *Communications and Coordination* (“existing COM-002-AB1-2a”)

Date of Request for Comment: <u>March 19, 2019</u> Period of Comment: <u>March 19, 2019</u> through <u>April 3, 2019</u> Comments From: <u>ATCO Electric Ltd.</u> Date [yyyy/mm/dd]: <u>2018/04/02</u>	Contact: <u>Dan Bamber</u> Phone: <u>780 918-0986</u> Email: <u>Dan.bamber@atco.com</u>
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Listed below is the summary description of changes for the proposed retirement of existing COM-002-AB1-2a. Please refer back to the Consultation Letter under the “Attachments” section to view materials related to the proposed retirement of existing COM-002-AB1-2a. Please place your comments/reasons for position underneath (if any).

Alberta Reliability Standard	Stakeholder Comments and/or Alternative Proposal
<p>New</p> <p>The AESO is seeking comments from stakeholders with regard to the following matters:</p> <ol style="list-style-type: none"> 1. Are there any requirements contained in proposed retirement of existing COM-002-AB1-2a that are not clearly articulated? If yes, please indicate the specific section of proposed retirement of existing COM-002-AB1-2a, describe the concern and suggest alternative language. 2. Please provide any additional comments regarding proposed retirement of existing COM-002-AB1-2a. 	<p><i>Comment # 1:</i></p> <p>AE has the following comments:</p> <ol style="list-style-type: none"> 1. R4 The term ‘12 months’ should be replaced with ‘annually’. This would be consistent with other ARS that have an action that must be completed yearly. 2. R5 In regards to this requirement, AE is of the understanding that an oral 2-party, person to person directive or instruction during an energy emergency alert, would only have to comply with the details of this requirement if the directive or instruction issued during the energy emergency alert is directly related. If the instruction or directive is not directly related and is on another topic, the AESO or TFO would not need to comply? Please clarify.



Date of Request for Comment: <u>March 19, 2019</u> Period of Comment: <u>March 19, 2019</u> through <u>April 3, 2019</u> Comments From: <u>EPCOR Distribution & Transmission Inc.</u> Date [yyyy/mm/dd]: <u>2019/04/03</u>	Contact: <u>Rajveen Gill</u> Phone: <u>780-412-3435</u> Email: <u>rgill@epcor.com</u>
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Listed below is the summary description of changes for the proposed new COM-002-AB-4. Please refer back to the Consultation Letter under the “Attachments” section to view materials related to the proposed new COM-002-AB-4. Please place your comments/reasons for position underneath (if any).

Alberta Reliability Standard	Stakeholder Comments and/or Alternative Proposal
<p>New</p> <p>The AESO is seeking comments from stakeholders with regard to the following matters:</p> <ol style="list-style-type: none"> 1. Are there any requirements contained in proposed new COM-002-AB-4 that are not clearly articulated? If yes, please indicate the specific section of proposed new COM-002-AB-4, describe the concern and suggest alternative language. 2. Please provide any additional comments regarding proposed new COM-002-AB-4. 	<p>Comment # 1:</p> <p><i>Please provide clarity on the term “multiple-party burst” as identified in section R1.4</i></p> <p><i>R1.6 reads as though all system element nomenclature must be documented (R1). EDTI proposes a clarification to “specify system element nomenclature when issuing an oral or written instruction or directive” or “specify the use of system element when issuing an oral or written instruction or directive”</i></p>



Date of Request for Comment: <u>March 19, 2019</u> Period of Comment: <u>March 19, 2019</u> through <u>April 3, 2019</u> Comments From: <u>Suncor Energy Inc.</u> Date [yyyy/mm/dd]: <u>April 3, 2019</u>	Contact: <u>Julio Aparicio</u> Phone: <u>780-713-7130</u> Email: <u>japaricio@Suncor.com</u>
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Listed below is the summary description of changes for the proposed new COM-002-AB-4. Please refer back to the Consultation Letter under the “Attachments” section to view materials related to the proposed new COM-002-AB-4. Please place your comments/reasons for position underneath (if any).

Alberta Reliability Standard	Stakeholder Comments and/or Alternative Proposal
<p>New</p> <p>The AESO is seeking comments from stakeholders with regard to the following matters:</p> <ol style="list-style-type: none"> 1. Are there any requirements contained in proposed new COM-002-AB-4 that are not clearly articulated? If yes, please indicate the specific section of proposed new COM-002-AB-4, describe the concern and suggest alternative language. 2. Please provide any additional comments regarding proposed new COM-002-AB-4. 	<p><i>Comment # 1:</i></p> <p>Suncor request that the AESO provides what is acceptable measure for “assess adherence” in Subsection R4.1. It is proposed to TFO only but not to GFOs, is there any rational for it?</p>