

Period of Comment: January 5, 2021 through January 22, 2021 Contact: Jenette Yearsley

Comments From: AltaLink Phone: 403-387-8275

Date: 2021/01/22 Email: Jenette.Yearsley@AltaLink.ca

Instructions:

1. Please fill out the section above as indicated.

2. Please refer back to the Letter of Notice under the "Related Materials" section to view related materials.

3. Please respond to the questions below and provide your specific comments, if any. Blank boxes will be interpreted as favourable comments.

The AESO is seeking comments from Stakeholders on the proposed administrative amendments to Section 502.8 of the ISO rules, SCADA Technical and Operating Requirements ("Section 502.8") with respect to the following matters:



	Development of a Proposed ISO Rule	Stakeholder Comments
1.	Do you agree or disagree that the issues identified in the Letter of Notice require the proposed administrative amendments to Section 502.8? Please comment.	AltaLink is supportive of all opportunities to reduce "red tape". Eliminating unnecessary requirements or streamlining processes are important elements in continuing to make the industry more efficient. The requirements specified in the Rule do not appear to have changed except for one minor modification (see below).
2.	Do you agree or disagree with the proposed administrative amendments to Section 502.8? Please comment.	As the requirements specified in the Rule do not appear to have changed except for one minor modification (see below), AltaLink has no concerns with the administrative changes.
		The only requirement noted that did change slightly was the resolution on "All analog measurements not otherwise specified below" in Table 2. This changed slightly from "0.5% of the point being monitored" to "0.1". As units are not provided, we interpret that the revised requirement is to provide resolution to "1 decimal place" of resolution in the analog quantities units.
		Provided our interpretation is correct, we do not anticipate any issues with complying with this revised requirement. If the AESO proceeds with this Rule amendment, we recommend the AESO add some additional clarity in the final version.
3.	Do you agree or disagree with the proposed form of consultation and timelines? Please comment.	AltaLink agrees with the form of consultation. Minor changes, like this one, should not require more elaborate forms of consultation. The timeline to review and provide comments was a bit short. It is challenging to divert resources from ongoing business to perform a detailed review of a Rule to understand the extent of the changes. In this particular case, this was challenging as it was hard to ascertain the extent or nature of the changes through the multiple blackline edits. Perhaps there is a summary of key proposed changes could be provided by the AESO as part of the process.
4.	Do you agree or disagree that no consultation group is required for this ISO rule development? Please comment.	AltaLink agrees that a consultation group is not required as long as the scope of the Rule change is administrative in nature.