

March 19, 2019

To: Market Surveillance Administrator, Market Participants, and other interested parties

Re: **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”

Section 19 of the *Transmission Regulation* requires the Alberta Electric System Operator (“AESO”) to consult with stakeholders likely to be directly affected by the AESO’s adoption or making of Alberta reliability standards, and also requires the AESO to forward the proposed Alberta reliability standards to the Alberta Utilities Commission (“AUC” or “Commission”) for review along with the AESO’s recommendation that the Commission approve or reject them.

Accordingly, the AESO is providing notice and seeking feedback from the Market Surveillance Administrator, market participants, and other interested parties (“Stakeholders”) on the proposed COM Standards.

Applicability

The proposed new COM-002-AB-4 is applicable to:

- (a) the operator of a generating unit that is directly connected to the transmission system or to transmission facilities within the City of Medicine Hat;
- (b) the operator of an aggregated generating facility that is directly connected to the transmission system or to transmission facilities within the City of Medicine Hat;
- (c) the operator of a transmission facility; and
- (d) the AESO.

Background

Existing Alberta reliability standards COM-001-AB1-1.1 and COM-002-AB1-2a were adopted in Alberta on October 1, 2013. The purpose of these reliability standards is to ensure the AESO and each operator of a transmission facility have adequate and reliable voice and message telecommunication facilities internally and with others for the exchange of interconnection and operating information necessary to maintain reliability.

Existing Section 502.4 of the ISO rules, *Automated Dispatch and Message System and Voice Communication System Requirements* (“Section 502.4”) describes the minimum Automated Dispatch and Messaging System and voice communication systems requirements for market participants with facilities in Alberta, other than those to which COM-001-AB1-1.1 and COM-002-AB1-2a apply.

The AESO has determined that greater clarity is required regarding the facilities to which COM-001-AB1-1.1 and COM-002-AB1-2a are applicable, and to eliminate any potential overlap with existing Section 502.4.

Since the adoption of COM-001-AB1-1.1 and COM-002-AB1-2a in Alberta, the corresponding NERC standards have been revised¹ resulting in a consolidation of the subject matter, an enhanced clarity in the wording of the requirements, and a significant shift in the focus and content of NERC COM-002-4, *Operating Personnel Communications Protocols* (“NERC COM-002-4”), which now primarily addresses operations communication protocols rather than communications facilities.

The AESO intends to consult on and forward the retirement of existing COM-001-AB1-1.1 and COM-002-AB1-2a, and to consult on and file an application for approval of amendments to related new and amended ISO rules at the same time. The purpose and objective of these amendments are as follows:

- Existing COM-001-AB1-1.1: To be retired as the requirements will be addressed in proposed new Section 502.17;
- Existing COM-002-AB1-2a: To be retired and replaced with COM-002-AB-4 which focuses on reducing the possibility of miscommunications through requirements for predefined communication protocols;
- Proposed new COM-002-AB-4: To be adopted and replace existing COM-002-AB1-2a which focuses on reducing the possibility of miscommunications through requirements for predefined communication protocols;
- Proposed amended Section 502.4: To be amended so as to retain the details related to Automated Dispatch and Messaging System requirements and accountabilities for electricity market participants and the AESO and to remove all voice communication requirements and accountabilities for electricity market participants and the AESO. Existing Section 502.4 Automated Dispatch and Messaging System and Voice Communication System Requirements will be renamed Automated Dispatch and Messaging System; and
- Proposed new Section 502.17 of the ISO rules *Voice Communication System Requirements*: To be drafted to combine all voice communication requirements and accountabilities for electricity market participants and the AESO from existing Section 502.4 and NERC COM-001-3 in a single document.

The specific details of the consultation and amendments related to the ISO rules can be found on the AESO website on the “Stakeholder engagement” page.

Summary of Proposed Changes

In developing the proposed new COM-002-AB-4, the AESO determined that certain Alberta variances and administrative amendments were required in order to ensure that NERC COM-002-4 is capable of being applied in Alberta and does not require a material change in the framework of the market for electric energy. A summary of these Alberta variances and administrative amendments are as follows:

Alberta variances:

¹ The NERC reliability standards COM-001-2.1, *Communications* (“NERC COM-001-2.1”), and COM-002-4, *Operating Personnel Communications Protocols* (“NERC COM-002-4”).

- the AESO has amended Requirement R1.6 to reflect that the nomenclature must be specified for all system elements when issuing an instruction or directive, not just when referring to interface elements and facilities between two operating entities; and
- the AESO has amended Requirement R5 and R6 to replace “during an emergency” with “directive; or instruction during an emergency alert” to bring clarity, within the Alberta industry context, to the phrase “during an emergency” as it applies in proposed new COM-002-AB-4.

Administrative amendments:

- the purpose section has been amended so that the generic term “instruction” combined with the [Consolidated Authoritative Document Glossary](#) (“CADG”) defined term “directive” is equivalent to the NERC term “operating instruction”; and
- the NERC COM-002-4 “Applicability” section has been redrafted to ensure the proposed new COM-002-AB-4 is capable of application in Alberta. Specifically, the operator of an electric distribution system has been omitted. NERC applied NERC-COM-002-04 to “Distribution Providers” which, when translated to the Alberta reliability framework, would include the “operator of an electric distribution system” and the “operator of a transmission facility”. However, the AESO has determined that for the purpose of applying this reliability standard in Alberta, COM-002-AB-4 only needs to apply to the operator of a transmission facility.

In addition, the AESO made amendments to ensure consistent use of defined terms as included in the AESO’s CADG. Administrative changes, such as formatting and grammatical corrections, have also been made in the proposed new COM-002-AB-4.

Defined Terms

When reviewing the attached proposed new, retirement and rejection of COM Standards stakeholders should note that all defined terms appear **bolded**. Stakeholders and other interested parties are encouraged to refer to the AESO’s CADG when reviewing proposed Alberta reliability standards to ensure they have an accurate understanding of those defined terms.

Implementation of Alberta Reliability Standards

In accordance with Section 19 of the *Transmission Regulation*, the reliability standards that apply in Alberta are those of the Electric Reliability Organization (“ERO”) or any other reliability standards, to the extent that such reliability standards are adopted by the AESO after consultation with market participants and after receipt of Commission approval. The NERC was certified as the ERO for the United States by the Federal Energy Regulatory Commission under the US *Energy Policy Act* of 2005. Further, the NERC was recognized as the ERO by the Minister of Energy in Alberta.

Alberta reliability standards and definitions proposed for approval or rejection by the AESO are developed:

- (a) based on the reliability standards and definitions of the NERC; or
- (b) to amend, supplement or replace the NERC reliability standards or definitions.

For more information on the AESO’s reliability standards, visit the AESO website at www.aeso.ca and follow the path Rules, Standards and Tariff > Alberta Reliability Standards.

Request for Comment

Please use the attached Stakeholder Comment Matrix when submitting comments to the AESO. Only written comments will be considered in finalizing proposed new, retirement and rejection of COM Standards. Market participants should ensure that comments provided represent all interests within their organization. The scope of comments is limited to proposed new, retirement and rejection of COM Standards. Any comments received that are outside of this scope will not be considered by the AESO.

Stakeholders are asked to provide comments no later than **April 3, 2019** to ars_comments@aeso.ca. Adherence to deadlines is essential to the integrity of the Alberta reliability standard comment process. As such, any stakeholder comments received after April 3, 2019 may not be published, replied to, or otherwise considered by the AESO.

The AESO will be publishing all comments received for industry review in April. The AESO expects to publish replies to the comments with the final proposed new, retirement and rejection of COM Standards in April 2019.

If the AESO does not receive comments regarding proposed new, retirement and rejection of COM Standards, the AESO expects to forward the proposed new, retirement and rejection of COM Standards to the Commission in May 2019, along with its recommendation that the Commission approve the proposed new, retirement and rejection of COM Standards, to become effective the first day of the calendar quarter (January 1, April 1, July 1 or October 1) that follows three full calendar quarters after approval by the Commission.

Attachments to Consultation Letter

The following documents are attached:

1. [Stakeholder Comment Matrix](#) for proposed new COM-002-AB-4;
2. [Copy](#) of proposed new COM-002-AB-4;
3. [Stakeholder Comment Matrix](#) for proposed retirement of existing COM-001-AB1-1.1;
4. [Copy](#) of proposed retirement of existing COM-001-AB1-1.1;
5. [Stakeholder Comment Matrix](#) for proposed removal of existing COM-002-AB1-2a; and
6. [Copy](#) of proposed removal of existing COM-002-AB1-2a.

Sincerely,

"Melissa Mitchell-Moisson"

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Attachments