

Date of Request for Comment:	<u>December 7, 2020</u>	Contact:	<u>Julio Aparicio</u>
Period of Comment:	<u>December 7, 2020</u> through <u>January 12, 2021</u>	Phone:	<u>(403) 296-8953</u>
Comments From:	<u>Suncor Energy Inc.</u>	Email:	<u>japaricio@Suncor.com</u>
Date [yyyy/mm/dd]:	<u>2021/01/12</u>		

Instructions:

1. Please fill out the section above as indicated.
2. Please refer back to the Consultation Letter under the “Attachments” section to view materials related to the proposed new PER-006-AB-1, *Specific Training for Personnel* (“new PER-006-AB-1”).
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.

Alberta Reliability Standard	Stakeholder Comments and/or Alternative Proposal
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<p>1. Is the requirement contained in proposed new PER 006-AB-1 clearly articulated? If no, describe the concern and suggest alternative language.</p>	<p>Suncor Energy Inc. appreciates this engagement initiated by the AESO.</p> <p>We have the following comments:</p> <ol style="list-style-type: none"> 1. Will the AESO’s version PER-006-AB-1 R1 have the same interpretation as the NERC PER-006-1 Guidelines and Technical Basis Section, https://www.nerc.com/pa/Stand/Reliability%2520Standards/PER-006-1.pdf. If yes, will the AESO adopt same guidelines and technical basis as an ID document and post on the AESO website? If not, please advise variance from the guidance that the NERC provided. 2. If the entity complied with the older version PRC-001-AB1-1 R1 that required similar training, does this mean that by using the same type of training and evidence, the entity will meet compliance requirements for PER-006-AB-1 R1? 3. Is it sufficient to train Transmission and Distribution (T&D) personnel instead of generator operators (i.e. Power Engineers, Boiler Operators)? Only T&D personnel are responsible for operation and maintenance of protection systems of generating unit’s. If there are any trips/alarms related to generator protection systems, they are addressed by T&D personnel and not specifically by generator operators. 4. The proposed 4 full calendar quarters implementation plan (from the approval by the Commission) may not be adequate to meet the compliance timeline given the current COVID19 situation and budget limitations. Even though this requirement is similar to the previous PRC-001-AB1-1 R1, we will need to review/modify the training materials, develop training modules, revise internal
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	procedures and re-train the operators. We propose 8 full calendar quarters to allow more flexibility to meet compliance.
2. Do you have any additional comments regarding proposed new PER-006-AB-1? If yes, please specify.	