

Proposed New Reliability Standard ADM-002-AB-1, *Waivers and Variances*

Date of Request for Comment: <u>January 26, 2021</u>	Contact: <u>Dan Bamber</u>
Period of Comment: <u>January 26, 2021</u> through <u>February 19, 2021</u>	Phone: <u>780-918-0986</u>
Comments From: <u>ATCO Electric Ltd.</u>	Email: <u>Dan.bamber@atco.com</u>
Date: <u>2021/02/19</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 ADM-002-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
<p>New</p> <p>1. Are there any requirements contained in the proposed new ADM-002-AB-1 that are not clearly articulated? If yes, please indicate the specific section of the proposed new ADM-002-AB-1, describe the concern and suggest alternative language.</p>	<p>Comment #1. ATCO thanks the AESO for the opportunity to comment on this new Reliability Standard and believes this is a good improvement.</p> <p>-As per Section 6, AESO is requesting waivers or variances to the ISO be in writing. AE suggests AESO to develop a template or form so MP’s can complete the request to ensure all relevant areas of concern are identified and requests are consistent similar to ISO Rule 103.14.</p> <p>-As per Section 6, AE suggests that AESO includes the email location where the request is to be sent to avoid confusion.</p>

<p>2. Do you have any additional comments regarding the proposed new ADM-002-AB-1? If yes, please specify.</p>	<p>-AE is concerned that with this being a Reliability Standard that it will be subject to future ARS audits. If this new ARS does not apply to a Market Participant, what proof of evidence will RS Compliance be requesting to show in an audit. This should be identified in an ID so MP's fully understand AESO auditor's expectation.</p> <p>-AE believes there should be an estimated timeline identified for AESO to respond back to the MP in order for the MP to be able to effectively plan for compliance to a Reliability Standard if a waiver or variance is not accepted.</p>