

Date of Request for Comment:	January 26, 2021	Contact:	Chris Best
Period of Comment:	January 26, 2021 through February 19, 2021	Phone:	403-4623-1005
Comments From:	Best Consulting Solutions Inc.	Email:	chris1best@outlook.com
Date:	2021/02/16		

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><b>New</b></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>	No comment
<p>2. Do you have any additional comments regarding the proposed new ADM-002-AB-1? If yes, please specify.</p>	<p>While the content and material within the proposed ADM standard seem appropriate and helpful to the industry, it is unnecessary to enact them in a reliability standard. The content of the standard is practically identical to the content of ISO Rules Section 103.14 Waivers and Variances. There does not appear to be any value in the segmentation of the waivers and variances process related to reliability standards from those related to ISO Rules.</p> <p>The creation of this standard, as opposed to a simple revision to the rule to include standards, flies in the face of the current red tap reduction that the</p>

AESO is engaged in. The creation of this standard is actually a red tape increase as parties will be required to manage all of the materials, requirements and evidence for this standard on an ongoing basis.

This standard will create more work/effort for the AESO in monitoring compliance with this standard, which may well not be applicable to many entities. It also creates work and a compliance risk for the market participant as they must create and/or maintain evidence on a standard they may not have anything to do with. There is also the inherent difficulty of providing evidence that you did not request a waiver or variance, proving that you did not do something.