

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

Date of Request for Comment: <u>January 26, 2021</u>	Contact: <u>Jenette Yearsley</u>
Period of Comment: <u>January 26, 2021</u> through <u>February 19, 2021</u>	Phone: <u>403-387-8275</u>
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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:</p> <p>AltaLink appreciates the AESO’s willingness to allow waivers or variances to all Alberta Reliability Standards.</p> <p>As this is a rule subject to audit, what is the expectation of the AESO for evidence of compliance to the rule? Typically a rule would have a “Measures” section. AltaLink requests the rule be clear on what, if any, evidence (including any timelines) is required for audit.</p> <p>Comment # 2:</p> <p>Section 4(2) should include an additional circumstance for which variance or waiver can be requested by adding, “would pose a security risk (physical or cyber) or security issue”.</p>
<p>2. Do you have any additional comments regarding the proposed new ADM-002-AB-1? If yes, please specify.</p>	<p>AltaLink provides the following comments:</p>

Alberta Reliability Standard	Stakeholder Comments and/or Alternative Proposal
	<ol style="list-style-type: none"> 1. Please clarify if this new standard applies to both existing and new ARS standards that are still in the consultation phase. Can a Market Participant use this mechanism to request waivers for either/both existing standards and new standards under development. 2. Please provide information on the evaluation process to enable planning by Market Participants. For example, it would helpful to provide expected timelines for submission requests, the provision of progress updates and written decisions upon completion of evaluations to better define process expectations for Market Participants. 3. An AESO definition or information on “waiver” and “variance” to provide guidance for the conditions when a Market Participant would select either a waiver or a variance would be helpful.