

Date of Request for Comment:	January 26, 2021	Contact:	Shannon Ferdinand
Period of Comment:	January 26, 2021 through February 19, 2021	Phone:	7806916735
Comments From:	Capital Power GP Holdings Inc. "CPGPHI"	Email:	sferdinand@capitalpower.com
Date:	[2021/02/19]		

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 favorable 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: Capital Power supports the proposed <i>evaluation process</i> section (7), subject to the following additions / clarifications:</p> <ul style="list-style-type: none"> • Inclusion in the Alberta Reliability Standard (ARS) of a requirement for the applicant and the ISO to work collaboratively towards agreement on next steps and resolution to comply with the associated ARS should a waiver and variance be denied. • Clarification in the ARS of the dispute mechanism(s) available to the applicant should a waiver and variance request be denied. • Commitment from the AESO regarding estimated response timelines, as certain waivers and variance requests may be time sensitive and the entity may need to understand if a different course of action may need to be pursued. <p>Comment # 2: Capital Power generally agrees with the proposed <i>content of a waiver or variance</i> section (8), subject to the following additions /</p>

clarifications:

- With respect to 8(b), Capital Power requests clarification from the ISO for development of mitigation and remediation plans, and more specifically, whether this process will be led by the applicant or the ISO. If the ISO intends to lead the development of mitigation and remediation plans, Capital Power recommends that it seek input and involvement from applicants, including input on any milestones, as implementing solutions may require project planning and coordination of resources, pending availability.

Comment # 3: Capital Power generally agrees with the proposed *ongoing management of a waiver and variance* section (9), subject to the following additions / clarifications:

- With respect item 9(3), Capital Power requests that the AESO clarify whether a revoked waiver or variance request would require the market participant or legal owner to re-file another waiver or variance request. Re-filing another waiver or variance request may create an administrative inefficiency for both the applicant and the AESO. Capital Power recommends that in the event of a revocation, the ARS include a requirement whereby:
 - The ISO and the legal owner or market participant may work and agree towards a mitigation or remediation plan, including milestones for implementation; and
 - The legal owner or market participant may submit a dispute with the ISO.
- Additionally, with respect to 9(1) Capital Power requests clarification on what is considered a “material change”. While it may not be practical to define in the ARS the AESO should, at a minimum, include a description of “material change” in the associated Information Document including categories and examples of changes deemed “material”.
- The AESO should consider adding provisions to the proposed rule that would allow applicants or legal owners to apply to extend an approved waiver or variance. That provision could involve another evaluation process, as necessary, but should not require another re-filing of a waiver and variance application.

<p>2. Do you have any additional comments regarding the proposed new ADM-002-AB-1? If yes, please specify.</p>	<p>Capital Power is supportive of the intent of this standard and agrees that a waivers and variances mechanism will be valuable for use with the Alberta Reliability Standards.</p> <p>Comment # 4: Confidentiality of requests and decisions:</p> <ul style="list-style-type: none"> • Waiver and variance requests may contain information that is commercially sensitive to the applicant and such information should remain confidential. In addition, any supporting documentation submitted to the AESO as part of the evaluation process should also remain confidential. Capital Power believes that the AESO, or any other regulatory authority, should exercise caution in the public disclosure of such information relating to an entities waiver or variance request (including application, supporting documents and result) to ensure the safety and reliability of the asset and the Interconnected Electric System. Capital Power recommend a provision in the ARS requiring that the AESO, or any other regulatory authority, must inform the legal owner / market participant in advance of any information disclosure to the public. <p>Capital Power notes the use of ID #2020-007, Waivers and Variances Requests to provide clarification on ISO Rule 103.14 and recommends that a similar ID be created for the Alberta Reliability Standard.</p>