

**Comment #1 – 6/6/19 – 8:32 p.m.**

Hello,

I'm submitting this comment on my own behalf.

I believe that strictly limiting future profitability when revising NGE Scales (i.e. 3.4.2.4(c), 3.2(a), and a similar sentiment exuded by the rest of the standard) is an action that is better suited for regulators than for the ASB, which (in my opinion) should not directly regulate profitability. I believe it more appropriate for the standard to state a requirement more along the lines of "should consider maintaining the profitability structure as priced" or "not exceeding the profitability structure initially priced if required by applicable jurisdictions".

Thank you for your consideration,

Andrew Gaydosh