Alberta Utilities Commission

AUC Rule 004: Alberta Tariff Billing Code
Industry Consultation Meeting
Summary

Meeting date	February 8, 2012	**Time**	10 a.m. to 2 p.m.
Location	Video conference AUC offices Tenth floor, 10055 - 106 St., Edmonton Fourth floor, 425 First St. S.W., Calgary Teleconference Phone: 1-866-792-1318 Conference code: 8665992	**Facilitator**	AUC staff

1. Introductions

Name	Company
Chad Crossland	AltaGas Utilities Inc.
Nap Pepin	ATCO Electric
Ella Kulyk	ATCO Electric
Jessica Laird	ATCO Electric
Larry Shaben	ATCO Electric
Carol Benoit	ATCO Gas
Trevor Fenton	ATCO Gas
Anne Glass	AUC
Will Chow	AUC
Rob Thomas	AUC
Bettyann Skagen	Battle River REA
Lori Harnack	Cognera Corp.
Marcelo Maciel	Direct Energy
Brian Neufeld	ENMAX Encompass
Helen McKinlay	ENMAX Encompass
Lorne McKay	ENMAX Power
Terry Ryan	ENMAX Power
Lisa Zuger	EPCOR Distribution & Transmission Inc.
Erin McCurdy	EPCOR Distribution & Transmission Inc.
Tammy Haydey	EPCOR Energy Alberta Inc.
Shirley Kwan	EPCOR Energy Alberta Inc.
David Jackman	FortisAlberta
Ngan Duong	Just Energy
John Hutchison	Valeo Power
Ray Poon	Valeo Power

2. Review of last meeting's summary and Rule 004 Action Item List

    - The group did not have any changes for the October 5 meeting summary.

3. RIM Issue 474 – Cancels and rebills involving charge periods more than one year old – presentations of each organization's impact analysis of scenarios

    - During the meeting, the various market participants presented their assessment of the impacts of the AUC-proposed cancel/rebill timeframes (and variations of these timeframes) on their organizations.

    - ATCO Electric

        - ATCO Electric is not okay with any scenario that limits their ability to debit non-RRO eligible accounts to one year. Since 70 per cent of ATCO Electric's revenue comes from large self-retailers, this would mean a significant loss of revenue. Regarding non-RRO sites, ATCO Electric noted that collectability of past accounts may be easier with larger customers because these sites tend to have less site turnover.

        - Limiting of debits and credits to three years would not be as much concern since the dollar amount going beyond three years is insignificant.

        - ATCO Electric stated that their preference would be to have customer caused errors (e.g., theft), billing based on data provided by external MDMs, transmission-connected sites and contractor installed cross-meters (e.g., suite/address changes in multi-family complexes after meters have been installed) all excluded from the any cancel/rebill limits created by AUC Rule 004.

    - EPCOR Distribution & Transmission (EDTI)

        - EDTI indicated that it would be a big system change to go from a two-year credit on the TBF to a three-year credit limit on the TBF (one million dollars) for very little gain as the errors that go beyond two years are insignificant.

        - EDTI stated that their preference was to exclude direct-connect (transmission-connected) sites from the any cancel/rebill limits created by AUC Rule 004.

    - FortisAlberta

        - FortisAlberta handles most adjustments that go back more than a year manually. Changes would not impact them significantly.

    - ENMAX Power

        - ENMAX Power's system is set up to handle 11-month debits and credits. Any change from this would cost roughly one million dollars. ENMAX Power stated that their analysis showed errors that spanned more than one year were insignificant.

    - AltaGas Utilities

        - AltaGas Utilities handles most adjustments that go back more than a year manually. Changes would not impact them significantly.

- ATCO Gas
    - ATCO Gas indicated that any of the approaches being discussed would involve some system changes, but the impacts would not be great because of the small number of adjustments involved. However, ATCO Gas would prefer to see a balance in the adjustment period in a mixed meter situation (i.e., the debit at one site would match the credit at the other site).
- Valeo Power
    - Valeo Power, acting as distributor, indicated that they prefer not to have to differentiate between RRO eligible and non-RRO eligible. These adjustments are handled manually so system costs are negligible.
    - Valeo Power, acting as a retailer agent, indicated that they want the debits limited to 11 months because it is difficult to collect from customers years later.
- EPCOR Energy
    - By limiting the term of the credits from the distributor, EPCOR Energy, as both RRO provider and default supply provider, would be at a net loss totalling a significant dollar amount. By allowing the distributor to debit more than 11 months, EPCOR Energy would also lose money because they would be unable to pass the debit on to RRO customers. EPCOR Energy’s preference is to align with the RRO regulations and energy charges (PFAM rules).
- Just Energy
    - Any of the proposed changes could work. Just Energy prefers standardization.
- ENMAX Encompass
    - ENMAX Encompass prefers 11-month debit and three-year credit because it more closely matches settlement. Also, it is difficult to collect from a customer past a year.
- Direct Energy
    - Anything greater than 24 months will mean an extra data storage cost and system changes because of current archiving approaches. Direct Energy prefers 11-month debit and three-year credit because it more closely matches settlement. Standardization is good.
- Cognera
    - Cognera is concerned primarily with system costs. Cognera shares many of the same concerns as other retailers. Misalignment between codes has costs. Not being able to collect is a major cost. Better if it is closer to PFAM. Cognera raised the question that if three years is the cap, what happens with customer credits that are required past three years? Is the retailer going to be able to get information from the distributor? If so, what format?

- After the presentations, the group debated the various options. Retailers strongly indicated that it is important to limit the debit side to 11 months.

- The AUC questioned which approach each of the parties present could live with. While some would prefer to not change from their existing approach, the majority saw value in standardization. All parties other than ATCO Electric indicated that they could live with 11-month debits and three-year credits for both RRO eligible and non-eligible. ATCO Electric was not prepared to agree to debits limited to 11 months for non-RRO eligible.

4. <u>RIM Issue 478 – New transaction to allow easier reconciliation of distributors' invoices to TBFs</u>

    - While Valeo Power strongly supports this new transaction, no one supported this transaction enough to build a case to justify the cost that the distributors would be required to spend. It was agreed that this issue would be dropped.

    ACTION: AUC to close RIM Issue 478.

5. <u>RIM Issue 486 – Clarification of allowable uses of CSA</u>

    - Last meeting, ATCO Electric, EDTI and FortisAlberta were actioned with investigating the impacts on their organization of sending usage splits and charge splits at month end for all customers:

        - FortisAlberta performs only usage splits for all customers. They indicated that there would be additional system changes for a charge break which will come at a cost.

        - EDTI performs both splits for the RRO customers only. They can do this for all customers if required.

        - ATCO Electric performs only usage splits for all customers. ATCO Electric estimates that the cost of the system change to perform charge splits would be $250k - $375k plus about 10 per cent in storage cost. ATCO Electric also noted that charge splits would be useless for competitive retailers with fixed rates.

    - Retailer consensus around the group was that usage splits was the more important of the two. Charge splits are not necessary.

    ACTION: AUC to clarify in the rule that usage splits are mandatory for all customers at month end. Charge splits will be optional.

6. <u>Billing transmission-connected (direct-connect) sites</u>

    - The AUC informed the group that the meeting has been set up with the AESO for the afternoon of March 1. Valeo Power, Cognera, ATCO Electric, ENMAX Power, FortisAlberta and EDTI all indicated that they would like to attend.

    ACTION: AUC to send out an invite for meeting.

7. <u>RIM Issue 491 – Not possible for Distributor to create TBF lines for Retired or Salvaged</u>

    - Valeo Power raised this issue after encountering a situation with a distributor. The distributor had cancelled and rebilled charges for a site that had since been retired or salvaged. Due to the status of the site, the distributor was unable to use the original site ID in the cancel/rebill.

- Some distributors are unable to access retired or salvaged site IDs for the purpose of cancel/rebills. Others continue to maintain retired or salvaged site IDs in their database and can use them in cancel/rebills.

ACTION: Distributors to research the impacts (if any) of being required to keep retired or salvaged site IDs in their databases and use them in their cancel/rebills.

8. Other new issues

- ATCO Gas raised a question to the group: for the upcoming version, distributors need to give retailers three months notice for changes in the appendices. How about now?

- The AUC indicated there would be no harm in beginning this new process now. The AUC suggested that distributors begin sending notices of change to the AUC, and they will share them with retailers.

9. RIM Issue 489 – Include Micro Generation Consumption in the Tariff Bill File (TBF)

- The group decided that the best solution would be a new usage record type (e.g., MU).

ACTION: ENMAX Encompass to create a draft layout and present to the group at the next meeting.

10. RIM Issue 492 – Rule 010 - Historical Data request from an Energy Consultant

- Valeo Power raised this issue to find out whether or not providing historical usage to an energy consultant who does not follow AUC Rule 10 is acceptable. The rest of the group indicated that they get occasional requests for this from energy consultants. The other distributors explained that their process is to confirm that the energy consultant has a signature from the customer and that the customer matches the distributor's record of who the customer was at that time. One distributor indicated that they have, in their terms and conditions, fees for this service when there are multiple sites involved. The group did not feel any further discussion was required.

ACTION: AUC to close RIM Issue 492.