

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

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| Meeting date | April 4, 2012 | Time | 10 a.m. to 2 p.m. |
| Location | <u>Video conference AUC offices</u> Tenth floor, 10055 - 106 St., Edmonton Fourth floor, 425 First St. S.W., Calgary <u>Teleconference</u> Phone: 1-866-792-1318 Conference code: 8665992 | Facilitator | AUC staff |

1. Introductions

| Name | Company |
|-----------------|--|
| Chad Crossland | AltaGas Utilities Inc. |
| Chantal Martin | AltaGas Utilities Inc. |
| Ella Kulyk | ATCO Electric |
| Nap Pepin | ATCO Electric |
| Carol Benoit | ATCO Gas |
| Anne Glass | AUC |
| Bettyann Skagen | Battle River REA |
| Lori Harnack | Cognera Corp. |
| Theresa Wilson | Direct Energy |
| Brian Neufeld | ENMAX Encompass |
| Leo Scarcelli | ENMAX Power |
| Lorne McKay | ENMAX Power |
| Lisa Zuger | EPCOR Distribution & Transmission Inc. |
| Shirley Kwan | EPCOR Energy Alberta Inc. |
| Tammy Haydey | 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 February 8 meeting summary.

3. Billing transmission-connected (direct-connect) sites

- On March 1, a subgroup of the AUC Rule 004 TBC group met with the AESO to enlist the help of the AESO in identifying possible solutions for two problems distributors are encountering when flow-through billing transmission-connected sites: (1) when a site switches retailers mid-month and (2) when a POD is shared by two sites, especially when those sites belong to different retailers.
- The AUC provided the group a summary of what was discussed and decided in the meeting. Regarding mid-month switches, the group had discussed whether the AESO could split the charges on the enrolment date. The AESO had indicated that its tariffs are based on calendar months and, therefore, cannot split the charges based on days. The AESO also explained that in its terms and conditions (T&Cs) it restricts account setup and billing changes to the first of the month. It was decided during the meeting that the group would propose (to this AUC Rule 004 TBC group and to the AUC Rule 021 and 028 group) disallowing mid-month enrolments (retailer switches) for transmission-connected sites. Distributor T&Cs could be reworded, in these cases, to align with the AESO T&Cs.
- In this meeting, one person pointed out that, in addition to restricting enrolments to the first of the month for transmission-connected sites, deselections would also need to be restricted to being effective the first of the month. Also, the group discussed that this restriction would not be required for newly constructed sites and for de-energized sites that have been de-energized from the first of the month until retailer switch.

ACTION: The AUC to make the recommendation to the AUC Rule 021 and Rule 028 Working Group of restricting enrolments and de-enrolments to the first of the month only for transmission-connected sites.

- The group also discussed how best to handle situations where an enrolment intended for the first of the month failed for some reason. Would the enrolment then have to wait until the start of the next month? Distributors indicated that, depending on when the problem was brought to their attention by the retailer, they could likely work with the retailer to get the site set up for the full month without having to wait for the next month.
- In recapping the March 1 meeting with the AESO, the AUC also explained that, regarding the billing of shared PODs, the AESO had agreed to inquire within its own organization as to the possibility of creating a calculation tool, building on the current estimator on the AESO website. The idea from the meeting was that distributors could use the DIM data belonging to both of the sites sharing the POD, along with the AESO's calculation tool, to calculate each site's individual charges and balance them to the POD charges. The output from the calculation tool would then be provided to the retailers.
- The AUC Rule 004 TBC group was in favour of this idea, and the AUC committed to following up with the AESO to see whether the calculation tool could likely proceed.

ACTION: AUC to follow up with the AESO to find out the results of the AESO's internal discussions regarding whether or not the development and maintenance of a calculation tool would be a possibility.

4. RIM Issue 474 – Cancels and rebills involving charge periods more than one year old

- The group planned to temporarily suspend discussions on the time limits for debits and credits and to try to focus on what situations (if any) should be treated as exceptions to

the time limits for debits and credits once established. ATCO Electric was in favour of exceptions in situations of customer theft and mixed meters. The other distributors were not in favour of exceptions because they are usually able to identify theft and mixed meters within a year.

- ATCO Electric described situations where larger commercial and industrial customers perform rewiring without telling ATCO Electric, inadvertently bypassing the meter or causing mixed-meter situations. ATCO Electric expressed concern over the idea of large customers (non-residential) being able to get out of paying for demand and other distribution charges just by breaking the rules and rewiring without telling the distributor who potentially would only have a year to catch such situations. ATCO expressed similar concerns over customers bypassing the meter and being able to avoid charges if it was not discovered within a year.
- As the discussion of exceptions was very closely tied to the time limits, the group decided to focus again on time limits. ATCO Electric proposed a new idea to the group – for RRO-eligible customers, a one-year limit for debits and eight-year limit for credits; for non-RRO-eligible, two-year limit for both debits and credits. The other distributors were not in favour of this approach because they do not maintain RRO-eligibility status in their billing systems, and they indicated that adding RRO-eligibility status to their billing systems would be costly.
- ATCO Electric, then, proposed another approach which involved in certain circumstances that they could attempt to collect from the customer directly. For example, if the customer was responsible for wiring changes that resulted in an undercharge that was not identified within a year, the distributor would only send the retailer cancels and rebills up to one year but could then approach the customer directly to collect the distribution and transmission charges that go beyond a year.
- EPCOR Energy indicated that if this would help the group come to a consensus, they would not object to the distributor attempting to collect directly.
- One distributor expressed concerns that they would then be expected to try to collect directly from the customer when they, unlike ATCO Electric, do not see value in doing so.
- Direct Energy stated that on the one hand they would not have any objection to the distributor being the one having to collect. On the other hand, they were concerned that this may cause confusion for the customer since the retailer is the one with the billing arrangement with them.
- ATCO Electric stated that large customers already have industrial representatives, employees of the distributor that are already heavily involved with explaining situations to the customer anyway.
- Discussion of this topic concluded with retailers being asked to check with their organizations to see how they would feel about distributors in certain circumstances attempting to collect from customers directly.

ACTION: Retailers to check within their organizations as to whether or not they would object with allowing distributors, in circumstances involving errors where non-residential customers have been undercharged for more than a year, only correcting the errors through TBFs to the retailer for periods up to a year and optionally collecting directly from the customer for periods beyond a year.

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

- The group reviewed ENMAX Encompass' proposal for the handling of the micro-generation usage in the TBF file. The proposal involved two types of determinant records: MU which would be similar to the DU record and MD which would be similar to the DD record. The rules for whether or not an MD record would be required would be dependent on whether or not site was a GIM site. GCM sites would only receive an MU record.
- Also discussed were the possibilities of using a new commodity code for generation, using the miscellaneous determinant (DM) record type and using the OTC record type. The group concluded that the DM record approach would likely be the simplest and lowest cost approach. Parties agreed to research the approximate cost of implementing the DM approach and whether or not they have any concerns with this approach.

ACTION: Parties to review with their organization the approximate costs of implementation of the miscellaneous determinant (DM) approach for reporting micro-generation determinants in the TBF and whether this approach would likely cause any problems.

6. RIM Issue 491 – Not possible for Distributor to create TBF lines for Retired or Salvaged

- Distributors had been asked to present impacts (if any) of being required to keep retired or salvaged site IDs in their databases and use them in their cancels and rebills.
- No major impacts were raised, so the group agreed that this should be reflected in the rule.

ACTION: AUC to modify Rule 004 to stipulate that cancels and rebills involving site IDs no longer in use must use the site IDs contained in the original records.

7. Other new issues

- No new issues were raised in the meeting.