

## AUC Rule 004 (version 2.0): Alberta Tariff Billing Code Rules – Proposed changes

[Stakeholders: ENMAX Power Corporation (ENMAX Power), ENMAX Encompass Inc. (ENMAX Encompass), EPCOR Distribution & Transmission Inc. (EDTI), ATCO Electric Ltd. (ATCO Electric), ATCO Gas Ltd. (ATCO Gas), EPCOR Energy Alberta Inc. (EEAI), FortisAlberta Inc. (FortisAlberta)]

Section	Subsection	Existing	Proposed changes	Stakeholder comments	AUC response
1 General and administrative provisions	1.1 Application	<p>These rules sets out the minimum obligations a distributor under the Commission’s jurisdiction must meet to provide timely and accurate tariff bill-ready information to retailers for distribution and system access service provided by the distributor to the retailer.</p> <p>Retailers that carry out the function of an RSP under the Commission’s jurisdiction will be required to comply with the provisions of this rule. Prior to the Commission investigating any complaint from a retailer concerning the performance of a distributor under the rule, the retailer must demonstrate its compliance in accepting and exchanging tariff bill-ready information in the format set out in the rule.</p>	<p>(1) This rule sets out the minimum obligations <b>an owner of an electric distribution system, as defined in the Electric Utilities Act, or a gas distributor, as defined in the Gas Utilities Act,</b> must meet to provide timely and accurate tariff bill-ready information to retailers <b>and to its regulated rate provider, as defined in the Electric Utilities Act, or its default supply provider, as defined in the Gas Utilities Act,</b> for distribution and system access service.</p> <p>(2) <b>When an owner of an electric distribution system is also acting as the regulated rate provider, adherence to the provisions of this rule is not required for transactions between the owner of an electric distribution system as</b></p>	<p><b>ENMAX Power:</b></p> <ul style="list-style-type: none"> <li>Support, but please clarify why in point 5 there is reference to Section 3 of the Billing Regulation of the Electric Utilities Act or pursuant to Section 3.</li> </ul> <p><b>ENMAX Encompass:</b></p> <ul style="list-style-type: none"> <li>In favour</li> </ul> <p><b>EDTI:</b></p> <ul style="list-style-type: none"> <li>EDTI has no concerns with the proposed changes.</li> </ul> <p><b>EEAI:</b></p> <ul style="list-style-type: none"> <li>EEAI agrees with</li> </ul>	

Section	Subsection	Existing	Proposed changes	Stakeholder comments	AUC response
			<p>distributor and an owner of an electric distribution system as regulated rate provider. When a gas distributor is also acting as the default supply provider, adherence to the provisions of this rule is not required for transactions between the gas distributor as distributor and gas distributor as default supply provider.</p> <p>(3) A regulated rate provider that is authorized by an owner of an electric distribution system or a default supply provider that is authorized by a gas distributor is required to comply with the provisions this rule.</p> <p>(4) A retailer, as defined in the Electric Utilities Act or in the Gas Utilities Act, is not required to comply with the provisions in this rule. However, prior to the Commission investigating any complaint from a retailer concerning the performance of a distributor under this rule, the retailer must demonstrate its compliance in accepting and exchanging tariff bill-ready information in the format set out in this rule.</p> <p>(5) The provisions of this rule do not apply to a distributor</p>	<p>the proposed changes.</p>	

Section	Subsection	Existing	Proposed changes	Stakeholder comments	AUC response
			<p>invoicing a customer directly pursuant to Section 3 of the Billing Regulation of the Electric Utilities Act or pursuant to Section 3 of the Natural Gas Billing Regulation of the Gas Utilities Act.</p>		
	1.2 Definitions		<p>Changes to a number of definitions to align with Rule 021 and Rule 028. (See attached black line Rule 004 showing proposed changes.)</p>	<p><b>ENMAX Power:</b></p> <ul style="list-style-type: none"> <li>Why are WSDs the only Settlement transaction being referenced?</li> </ul> <p><b>EDTI:</b></p> <ul style="list-style-type: none"> <li>EDTI has no concerns with the proposed changes.</li> </ul>	
	1.3 Common abbreviations	None	<p>Add Section 1.3, Common abbreviations. (See attached black line Rule 004 showing proposed changes.)</p>	<p><b>ENMAX Power:</b></p> <ul style="list-style-type: none"> <li>Support</li> </ul> <p><b>ENMAX Encompass:</b></p> <ul style="list-style-type: none"> <li>In favour</li> </ul> <p><b>EDTI:</b></p> <ul style="list-style-type: none"> <li>See below for suggested changes.</li> </ul> <p><b>EEAI:</b></p> <ul style="list-style-type: none"> <li>EEAS agrees with the proposed</li> </ul>	

Section	Subsection	Existing	Proposed changes	Stakeholder comments	AUC response
2 Summary of Tariff Billing Code obligations	2.2.1 Distributor-initiated communication	<p>Section 2.2.1(2)</p> <p>b) Their usage estimation methodology and tolerance thresholds and any changes to these. Distributor information pertaining to this subject is presented in Appendix A.</p> <p>c) Their process for attributing time to usage transactions (in particular with respect to events such as meter changes or upgrades) and how this is reported as whole days for billing purposes. Distributor information pertaining to this subject is presented in Appendix C.</p> <p>d) Their process for adjusting tariff charges that were originally based on estimated usage following receipt of measured usage. Distributor information pertaining to this subject is presented in Appendix D.</p> <p>e) Their process for adjusting tariff charges for pre-implementation periods. Distributor information pertaining to this subject is presented in Appendix E.</p> <p>f) Their process for cutover to the code standards,</p>	<p>Section 2.2.1(2)</p> <p>(b) Their usage estimation methodology and tolerance thresholds and any changes to these. <del>Distributor information pertaining to this subject is presented in Appendix A.</del></p> <p>(c) Their process for attributing time to usage transactions (in particular with respect to events such as meter changes or upgrades) and how this is reported as whole days for billing purposes. <del>Distributor information pertaining to this subject is presented in Appendix C.</del></p> <p>(d) Their process for adjusting tariff charges that were originally based on estimated usage following receipt of measured usage. <del>Distributor information pertaining to this subject is presented in Appendix D.</del></p> <p>(e) <del>Their process for adjusting tariff charges for pre-implementation periods. Distributor information pertaining to this subject is presented in Appendix E.</del></p> <p>(f) Their process for <del>cutover to the code standards, including plans for</del> archiving and retrieval of historical data.</p>	<p>changes.</p> <p><b>ENMAX Power:</b></p> <ul style="list-style-type: none"> <li>Support</li> </ul> <p><b>ENMAX Encompass:</b></p> <ul style="list-style-type: none"> <li>Should this be Section 2.2.2 (1)? Otherwise, in favour</li> </ul> <p><b>EDTI:</b></p> <ul style="list-style-type: none"> <li>EDTI has no concerns with the proposed changes.</li> </ul> <p><b>EEAI:</b></p> <ul style="list-style-type: none"> <li>EEAI agrees with the proposed changes.</li> </ul>	

Section	Subsection	Existing	Proposed changes	Stakeholder comments	AUC response
		<p>including plans for archiving and retrieval of historical data.</p> <p>g) Standard codes relevant to a distributor's presentation of tariff bill-ready charges as set out in Appendix B.</p> <p>h) Quarterly performance reports according to Section 2.15.</p> <p>i) The changes to REA Codes relevant to the distributor's service territory as set out in Appendix B.</p>	<p>(g) Standard codes relevant to a distributor's presentation of tariff bill-ready charges as set out in Appendix A.</p> <p>(h) <del>Quarterly performance reports according to Section 2.15.</del></p> <p>(i) The changes to REA codes relevant to the distributor's service territory as set out in Appendix A.</p>		
		<p>Section 2.2.1(1)</p> <p>d) Approach to cancelling/rebiling of previously sent tariff charges. Distributor information pertaining to this subject is presented in Appendix G.</p> <p>e) Ability or limitations to their ability, to process CSA transactions that are backdated. Distributor information pertaining to this subject is presented in Appendix H.</p>	<p>Section 2.2.1(1)</p> <p><del>(d) Approach to cancelling/rebiling of previously sent tariff charges. Distributor information pertaining to this subject is presented in Appendix G.</del></p> <p><del>(e) Ability or limitations to their ability, to process CSA transactions that are backdated. Distributor information pertaining to this subject is presented in Appendix H.</del></p>	<p><b>ENMAX Power:</b></p> <ul style="list-style-type: none"> <li>• Support</li> </ul> <p><b>ENMAX Encompass:</b></p> <ul style="list-style-type: none"> <li>• Should this be 2.2.1(2)? Otherwise, in favour</li> </ul>	
	2.2.2 Retailer-initiated communication	<p>Section 2.2.2(1)</p> <p>c) Quarterly performance reports according to Section 2.15.</p>	<p>Section 2.2.2(1)</p> <p><del>(c) Quarterly performance reports according to Section 2.15.</del></p>	<p><b>ENMAX Power:</b></p> <ul style="list-style-type: none"> <li>• Support</li> </ul> <p><b>ENMAX Encompass:</b></p> <ul style="list-style-type: none"> <li>• In favour</li> </ul>	

Section	Subsection	Existing	Proposed changes	Stakeholder comments	AUC response
				<p><b>EDTI:</b></p> <ul style="list-style-type: none"> <li>EDTI has no concerns with the proposed changes.</li> </ul> <p><b>EEAI:</b></p> <ul style="list-style-type: none"> <li>EEAI agrees with the proposed changes.</li> </ul>	
	2.12 Link tariff billing to distributor invoicing	None	<p><b>Section 2.12(3)</b></p> <p>Distributor invoices must use "TBI" as the three-letter abbreviation for the transaction name, and the file must be in portable document format (PDF), not comma separated values format (CSV). The distributor invoice must be sent to the retailer via the standard transaction transport method for electronic data exchange for the electric and gas utility industry.</p>	<p><b>ENMAX Power:</b></p> <ul style="list-style-type: none"> <li>Support</li> <li>This would require a system change. Initial estimate is for \$38k</li> </ul> <p><b>ENMAX Encompass:</b></p> <ul style="list-style-type: none"> <li>In favour</li> </ul> <p><b>EDTI:</b></p> <ul style="list-style-type: none"> <li>EDTI has no concerns with the proposed changes.</li> </ul> <p><b>ATCO Electric:</b></p> <ul style="list-style-type: none"> <li>ATCO Electric believes the noted section is incorrect and should be 2.11(3)</li> </ul>	

Section	Subsection	Existing	Proposed changes	Stakeholder comments	AUC response
				<b>EEAI:</b> <ul style="list-style-type: none"> <li>EEAI agrees with the proposed changes.</li> </ul>	
	2.14 Monitor performance	<p>The market participants to whom this code applies (see section 1.5) are required to:</p> <ol style="list-style-type: none"> <li>structure their tariff billing processes and systems in a manner that allows them to achieve the time-based performance requirements outlined in Table 2-1; and</li> <li>monitor their performance of code obligations against the metrics presented in Table 2-2 below. Prior to June 1, 2008, market participants to whom this code applies may use Table 2-2, Performance Monitoring Metrics, set out in EUB Directive 12, <i>Alberta Tariff Billing Code</i>, version 1.3, dated December 15, 2006 to monitor their performance of code obligations; and provide monthly performance results to the Commission on a quarterly basis. The process and form for reporting performance results to the Commission are established outside of this code and are available on</li> </ol>	<p>The market participants to whom this rule applies (see Section 1.1) are required to structure their tariff billing processes and systems in a manner that allows them to achieve the time based performance requirements outlined in Table 2-1.</p> <p>(1) monitor their performance of code obligations against the metrics presented in Table 2-2 below. Prior to June 1, 2008, market participants to whom this code applies may use Table 2-2, Performance Monitoring Metrics, set out in EUB Directive 12, <i>Alberta Tariff Billing Code</i>, version 1.3, dated December 15, 2006 to monitor their performance of code obligations; and provide monthly performance results to the Commission on a quarterly basis. The process and form for reporting performance results to the Commission are established outside of this code and are available on the Tariff Billing Code page of the Commission website <a href="http://www.auc.ab.ca">www.auc.ab.ca</a>.</p>	<b>ENMAX Power:</b> <ul style="list-style-type: none"> <li>Support</li> </ul> <b>ENMAX Encompass:</b> <ul style="list-style-type: none"> <li>In favour</li> </ul> <b>EDTI:</b> <ul style="list-style-type: none"> <li>EDTI has no concerns with the proposed changes.</li> </ul> <b>EEAI:</b> <ul style="list-style-type: none"> <li>EEAI agrees with the proposed changes.</li> </ul>	

Section	Subsection	Existing	Proposed changes	Stakeholder comments	AUC response
		the Tariff Billing Code page of the Commission website <a href="http://www.auc.ab.ca">www.auc.ab.ca</a> .			
		<p>Table 2-1. Performance Requirements</p> <p>Table Ref ID 1:</p> <p>Measure: Number of days between the scheduled read date and the scheduled tariff bill file published date for a billing cycle, as stated in the tariff bill calendar file.</p>	<p>Table 2-1. Performance requirements</p> <p>Table Ref ID 1:</p> <p>Measure: For all sites other than transmission-connected sites: Number of days between the scheduled read date and the scheduled tariff bill file published date for a billing cycle, as stated in the tariff bill calendar file.</p>	<p><b>ENMAX Power:</b></p> <ul style="list-style-type: none"> <li>Support</li> </ul> <p><b>EDTI:</b></p> <ul style="list-style-type: none"> <li>EDTI has no concerns with the proposed changes.</li> </ul> <p><b>ATCO Electric:</b></p> <ul style="list-style-type: none"> <li>Should there be a listed metric such as: "Responsibility: Electric Distributor Target: Maximum: 6 business days"</li> </ul> <p><b>EEAI:</b></p> <ul style="list-style-type: none"> <li>EEAI agrees with the proposed changes.</li> </ul>	
		None	<p>Table 2-1. Performance requirements</p> <p>Table Ref ID 2, Tariff bill file publication timing</p> <p>Measure: For transmission-connected sites: number of days between receipt of the AESO invoice and the scheduled tariff bill file published date for a billing</p>	<p><b>ENMAX Power:</b></p> <ul style="list-style-type: none"> <li>Support</li> </ul> <p><b>EDTI:</b></p> <ul style="list-style-type: none"> <li>EDTI has concerns with this additional requirement.</li> <li>EDTI currently</li> </ul>	

Section	Subsection	Existing	Proposed changes	Stakeholder comments	AUC response
			<p>cycle, as stated in the tariff bill calendar file.</p> <p>Responsibility: Electric Distributor</p> <p>Target: Maximum: 6 business days</p>	<p>receives the AESO invoice 15 business days from the end of each month, and releases the scheduled tariff file on the last working day of the month. This approach was approved in Commission Decision 2010-408. Based on its existing approach, EDTI expects that it would be non-compliant with this new requirement four months of the year in each year. It would take a significant amount of time, effort and costs for EDTI to be compliant with this new requirement and EDTI does not see any benefit from changing its existing approach. Therefore EDTI suggests that following for Table Ref ID2: <b>Target: The tariff bill file must be</b></p>	

Section	Subsection	Existing	Proposed changes	Stakeholder comments	AUC response
				<p><b>published by the last day of the month following the billing period.</b></p> <p><b>ATCO Electric:</b></p> <ul style="list-style-type: none"> <li>ATCO Electric's current processes support end of the month billing for transmission connected sites as the AESO invoice is received on the 15<sup>th</sup> working day of the month. AE requests more information on the rationale for the 6 business days to bill AESO charges?</li> </ul> <p><b>EEAI:</b></p> <ul style="list-style-type: none"> <li>EEAI defers to EDTI on this issue.</li> </ul>	
		<p>Table 2-1. Performance Requirements</p> <p>Table Ref ID 8, Dispute resolution timing</p> <p>Target : Minimum: 1 elapsed business day</p>	<p>Table 2-1. Performance requirements</p> <p>Table Ref ID 9, Dispute resolution timing</p> <p>Target:</p> <p>Mean: 35 calendar days for 95</p>	<p><b>ENMAX Power:</b></p> <ul style="list-style-type: none"> <li>Support</li> </ul> <p><b>ENMAX Encompass:</b></p> <ul style="list-style-type: none"> <li>In favour</li> </ul>	

Section	Subsection	Existing	Proposed changes	Stakeholder comments	AUC response
		<p>Mean: 5 elapsed business days for 95% of disputes</p> <p>Maximum: by next scheduled bill file publish date for the site</p>	<p>per cent of disputes</p> <p>Maximum: 70 calendar days for 100 per cent of disputes</p>	<p><b>EDTI:</b></p> <ul style="list-style-type: none"> <li>EDTI has no concerns with the proposed changes.</li> </ul> <p><b>ATCO Gas:</b></p> <ul style="list-style-type: none"> <li>Please confirm that this is what was discussed/decided at the AUC meetings.</li> </ul> <p><b>EEAI:</b></p> <ul style="list-style-type: none"> <li>EEAI agrees with the proposed changes.</li> </ul>	
		<p>Table 2-1. Performance Requirements</p> <p>Table Ref ID 12, Gas site cycle change notice</p> <p>Target: Minimum: 20 calendar days</p>	<p>Table 2-1. Performance requirements</p> <p>Table Ref ID 13, Gas site cycle change notice</p> <p>Target: Minimum: 30 calendar days</p>	<p><b>ENMAX Power:</b></p> <ul style="list-style-type: none"> <li>Support</li> </ul> <p><b>ENMAX Encompass:</b></p> <ul style="list-style-type: none"> <li>In favour</li> </ul> <p><b>EDTI:</b></p> <ul style="list-style-type: none"> <li>EDTI has no concerns with the proposed changes.</li> </ul> <p><b>EEAI:</b></p> <ul style="list-style-type: none"> <li>EEAI agrees with the proposed</li> </ul>	

Section	Subsection	Existing	Proposed changes	Stakeholder comments	AUC response
				changes.	
		<p>Table 2-1. Performance Requirements</p> <p>Table Ref ID 13, Bill production timing for withheld sites</p> <p>Target:...Maximum: within two billing cycles (i.e., by the next following scheduled tariff bill file publish date for that site)</p>	<p>Table 2-1. Performance requirements</p> <p>Table Ref ID 14, Bill production timing for withheld sites</p> <p>Target:...Maximum: by the next scheduled tariff bill file date after the date the site was withheld from its scheduled tariff bill file.</p>	<p><b>ENMAX Power:</b></p> <ul style="list-style-type: none"> <li>Support</li> </ul> <p><b>ENMAX Encompass:</b></p> <ul style="list-style-type: none"> <li>In favour</li> </ul> <p><b>EDTI:</b></p> <ul style="list-style-type: none"> <li>EDTI has no concerns with the proposed changes.</li> </ul> <p><b>EEAI:</b></p> <ul style="list-style-type: none"> <li>EEAI agrees with the proposed changes.</li> </ul>	
		<p>Table 2-2. Performance monitoring metrics</p> <p>Table Ref ID 1</p>	<p>Table 2-1. Performance requirements</p> <p>Move Table Ref ID 1 from Table 2-2 to Table 2-1 to become:</p> <p>Table Ref ID 18:</p> <p>Requirement: Currency of tariff bill file content</p> <p>Measure: Percentage of all sites with a site production reason code of "2020" (regular billing cycle) published in original tariff bill files, where the number of business days from the current bill period end date for each site to the tariff bill file date created is less than or equal to eight</p>	<p><b>ENMAX Power:</b></p> <ul style="list-style-type: none"> <li>Typo on the percentage? Assume stays as 95% so support if this is the case.</li> </ul> <p><b>ENMAX Encompass:</b></p> <ul style="list-style-type: none"> <li>In favour</li> </ul> <p><b>EDTI:</b></p> <ul style="list-style-type: none"> <li>EDTI has no concerns with the proposed changes.</li> <li>EDTI noted that</li> </ul>	

Section	Subsection	Existing	Proposed changes	Stakeholder comments	AUC response
			<p>business days.</p> <p>Formula: Number of sites within original tariff bill files with a site production reason code of “2020” (regular billing cycle), where the tariff bill file date created minus the current bill period end date for each site is less than or equal to eight business days, divided by the total number of sites with that same site production reason code in original tariff bill files.</p> <p>Responsibility: Distributor</p> <p>Target: 9 per cent of sites</p> <p>Footnote reads: Distributors are exempt from including sites belonging to a seasonal bill cycle (e.g. irrigation) and sites dependent on transmission tariff information from the ISO when reporting their performance for this metric.</p>	<p>there may be a potential correction of the Target. It believes it should be 98% not 9% of sites as currently drafted.</p> <p><b>ATCO Electric:</b></p> <ul style="list-style-type: none"> <li>ATCO Electric believes the stated target of 9% is incorrect and should be 95%.</li> </ul> <p><b>ATCO Gas:</b></p> <ul style="list-style-type: none"> <li>Please confirm that the target should be 95% not 9% as indicated here.</li> </ul> <p><b>EEAI:</b></p> <ul style="list-style-type: none"> <li>EEAI agrees with the proposed changes with the correction of the “9% of sites”.</li> </ul> <p>Target 98 per cent of sites.</p>	
		<p>Table 2-2. Performance monitoring metrics</p> <p>Table Ref ID 1</p>	<p>Table 2-1. Performance requirements</p> <p>Move Table Ref ID 1 from Table</p>	<p><b>ENMAX Power:</b></p> <ul style="list-style-type: none"> <li>Support</li> </ul>	

Section	Subsection	Existing	Proposed changes	Stakeholder comments	AUC response
			<p>2-2 to Table 2-1 to become:            Table Ref ID 19:            Requirement: <b>File completeness</b>            Measure: <b>Percentage of all sites assigned to billing cycles transmitted in original tariff bill files with a site production reason code of “2020” (regular billing cycle) on their scheduled tariff bill file publish date as stated in the tariff bill calendar file.</b>            Formula: <b>Number of sites assigned to billing cycles and transmitted in original tariff bill files on their scheduled tariff bill file publish date with a site production reason code of “2020” (regular billing cycle), divided by the total number of sites expected to bill for those billing cycles.</b>            Responsibility: <b>Distributor</b>            Target: <b>98 per cent of sites</b></p>	<p><b>ENMAX Encompass:</b></p> <ul style="list-style-type: none"> <li>In favour</li> </ul> <p><b>EDTI:</b></p> <ul style="list-style-type: none"> <li>EDTI has no concerns with the proposed changes.</li> </ul> <p><b>EEAI:</b></p> <ul style="list-style-type: none"> <li>EEAI agrees with the proposed changes.</li> </ul>	
		<p>Table 2-2. Performance monitoring metrics            Table Ref ID 3, 4, 5, 6 and 7</p>	<p>After moving Table Ref ID 1 and Table Ref ID 2 from Table 2-2 to Table 2-1, delete the remainder of the table.</p>	<p><b>ENMAX Power:</b></p> <ul style="list-style-type: none"> <li>Support</li> </ul> <p><b>ENMAX Encompass:</b></p> <ul style="list-style-type: none"> <li>In favour</li> </ul> <p><b>EDTI:</b></p> <ul style="list-style-type: none"> <li>EDTI has no concerns with the proposed</li> </ul>	

Section	Subsection	Existing	Proposed changes	Stakeholder comments	AUC response
				changes.  <b>EEAI:</b> <ul style="list-style-type: none"> <li>EEAI agrees with the proposed changes.</li> </ul>	
	2.15 Measurement and reporting protocol		Delete Section 2.15, Measurement and reporting protocol.	<b>ENMAX Power:</b> <ul style="list-style-type: none"> <li>Support</li> </ul> <b>ENMAX Encompass:</b> <ul style="list-style-type: none"> <li>In favour</li> </ul> <b>EDTI:</b> <ul style="list-style-type: none"> <li>EDTI has no concerns with the proposed changes.</li> </ul> <b>EEAI:</b> <ul style="list-style-type: none"> <li>EEAI agrees with the proposed changes.</li> </ul>	
	2.16 Data retention	Distributors are obligated to retain tariff billing data in its original format for a minimum of two (2) years, after which time information used in the derivation of tariff billing data must be retained for an additional five (5) years.	Distributors are obligated to retain tariff billing data in its original format for a minimum of <b>three</b> years, after which time information used in the derivation of tariff billing data must be retained for an additional <b>four</b> years.	<b>ENMAX Power:</b> <ul style="list-style-type: none"> <li>Support</li> </ul> <b>ENMAX Encompass:</b> <ul style="list-style-type: none"> <li>In favour</li> </ul> <b>EDTI:</b> <ul style="list-style-type: none"> <li>EDTI is concerned with the proposed change from 2</li> </ul>	

Section	Subsection	Existing	Proposed changes	Stakeholder comments	AUC response
				<p>years to 3 years from retaining tariff billing data in its original format. Currently, EDTI retains the tariff billing data in its original format for 2 years. In order to retain the tariff billing data in its original format for 3 years it is expected that its data base will need to increase from 6 to 8 Tb. 8 Tb is above EDTI's existing data bases capacity. Therefore, EDTI would need to upgrade its data based in order to retain 3 years of tariff billing data in its original form which is expect to cost approximately \$1.5 million. EDTI notes in a given year it identifies 8 customers that were billed inaccurately two or three years from the date in</p>	

Section	Subsection	Existing	Proposed changes	Stakeholder comments	AUC response
				<p>which the analysis is completed. As a result, EDTI expects that the costs of upgrading its data base are significantly higher than the benefits received from being complainant with this new requirement. As such, EDTI recommends maintaining the existing practice of retaining tariff billing data in original format for a minimum of two years, after which time information used in the derivation of tariff billing data must be retained for an additional five years be continued.</p> <p><b>EEAI:</b></p> <ul style="list-style-type: none"> <li>• EEA I defers to EDTI on this issue.</li> </ul>	

Section	Subsection	Existing	Proposed changes	Stakeholder comments	AUC response
3 Tariff bill-ready model	3.1.1 Distributor responsibilities	3) If actual metering data spanning the scheduled billing period are not available, usage information is estimated for the appropriate tariff bill periods in accordance with a distributor's usage estimation process (see Appendix A).	(3) If actual metering data spanning the scheduled billing period is not available, usage information is estimated for the appropriate tariff bill periods in accordance with a distributor's usage estimation process as filed with the Commission.	<p><b>ENMAX Power:</b></p> <ul style="list-style-type: none"> <li>Support</li> </ul> <p><b>ENMAX Encompass:</b></p> <ul style="list-style-type: none"> <li>In favour</li> </ul> <p><b>EDTI:</b></p> <ul style="list-style-type: none"> <li>EDTI has no concerns with the proposed changes.</li> </ul> <p><b>EEAI:</b></p> <ul style="list-style-type: none"> <li>EEAI agrees with the proposed changes.</li> </ul>	
	3.2 Tariff billing events	Section 3.2(4), Footnote 5 reads: A charge period event should result in a universal split of all charge records, irrespective of charge component (combination of tariff cross-reference code, component category code, component type code, component basis code and step number). However, due to system limitations, FortisAlberta cannot universally split charge component records as a result of a charge period event.	Section 3.2(2)(d), Footnote 4 to read: A charge period event should result in a universal split of all charge records, irrespective of charge component (combination of tariff cross-reference code, component category code, component type code, component basis code and step number). However, due to system limitations, FortisAlberta cannot universally split charge component records as a result of a charge period event.	<p><b>ENMAX Power:</b></p> <ul style="list-style-type: none"> <li>Support</li> </ul> <p><b>ENMAX Encompass:</b></p> <ul style="list-style-type: none"> <li>In favour</li> </ul> <p><b>EDTI:</b></p> <ul style="list-style-type: none"> <li>EDTI has no concerns with the proposed changes.</li> </ul> <p><b>EEAI:</b></p> <ul style="list-style-type: none"> <li>EEAI agrees with the proposed changes.</li> </ul>	

Section	Subsection	Existing	Proposed changes	Stakeholder comments	AUC response
		<p>Table 3-1., Tariff billing events</p> <p>Table Ref ID 5:</p> <p>Description: A CSA is sent from a retailer to a distributor as a result of one of the following:</p> <ul style="list-style-type: none"> <li>▪ Customer move in/ move out</li> <li>▪ Retailer terminates a contract for provision of electric services.<sup>6</sup></li> </ul> <p>Footnote 6 reads: Unique circumstances for ENMAX Energy Corporation only – otherwise termination of electric services results in an enrollment/ deenrollment transaction between retailers.</p>	<p>Table 3-1., Tariff billing events</p> <p>Table Ref ID 5:</p> <p>Description: A CSA is sent from a retailer to a distributor as a result of one of the following:</p> <ul style="list-style-type: none"> <li>▪ Customer move in / move out</li> <li>▪ <del>Retailer terminates a contract for provision of electric services.<sup>6</sup></del></li> </ul> <p>Delete Footnote 6.</p>	<p><b>ENMAX Power:</b></p> <ul style="list-style-type: none"> <li>• Support</li> </ul> <p><b>ENMAX Encompass:</b></p> <ul style="list-style-type: none"> <li>• In favour</li> </ul> <p><b>EDTI:</b></p> <ul style="list-style-type: none"> <li>• EDTI has no concerns with the proposed changes.</li> </ul> <p><b>EEAI:</b></p> <ul style="list-style-type: none"> <li>• EEAI agrees with the proposed changes.</li> </ul>	
		<p>None</p>	<p>Table 3-1., Tariff billing events</p> <p>Table Ref ID 19:</p> <p>Tariff Billing Event: <b>Calendar Month End</b></p> <p>Description: <b>The last day of a month has occurred.</b></p> <p>Tariff Bill File Event: <b>N</b></p> <p>Tariff Bill Period Event: <b>O</b></p> <p>Usage Period Event: <b>M</b></p> <p>Charge Period Event: <b>O</b></p>	<p><b>ENMAX Power:</b></p> <ul style="list-style-type: none"> <li>• EPS support this change, however we need to clarify how a backdated scenario would be handled. For example, site isn't presented in a file with a month end usage brake of Oct 31/13. Later site is created (new energization) with an effective date of Oct 28<sup>th</sup>. When</li> </ul>	

Section	Subsection	Existing	Proposed changes	Stakeholder comments	AUC response
				<p>site is first presented in a TBF, should it also have a usage break for Oct 31<sup>st</sup>?</p> <p><b>ENMAX Encompass:</b></p> <ul style="list-style-type: none"> <li>In favour</li> </ul> <p><b>EDTI:</b></p> <ul style="list-style-type: none"> <li>EDTI has no concerns with the proposed changes.</li> </ul> <p><b>EEAI:</b></p> <ul style="list-style-type: none"> <li>EEAI agrees with the proposed changes.</li> </ul>	
4 Information exchange	4.1 Information exchange	<p>The standards presented in the following sections are intended to be as specific as practical to facilitate data exchange between distributors and retailers. At the same time, the Commission recognizes that problems or issues may arise with individual market participants during system implementation and/or changes in market structure that would necessitate an adjustment to the standards. The Commission may</p>	<p>The standards presented in the following sections are intended to be as specific as practical to facilitate data exchange between distributors and retailers. At the same time, the Commission recognizes that problems or issues may arise with individual market participants during system implementation and/or changes in market structure that would necessitate an adjustment to the standards. The Commission may consider revising these standards upon presentation of a documented</p>	<p><b>ENMAX Power:</b></p> <ul style="list-style-type: none"> <li>Support</li> </ul> <p><b>ENMAX Encompass:</b></p> <ul style="list-style-type: none"> <li>In favour</li> </ul> <p><b>EDTI:</b></p> <ul style="list-style-type: none"> <li>EDTI has no concerns with the proposed changes.</li> </ul>	

Section	Subsection	Existing	Proposed changes	Stakeholder comments	AUC response
		<p>consider revising these standards upon presentation of a documented need to do so by a market participant. The Commission may also grant a market participant a temporary exemption (as prescribed in section 6.1) from these standards, provided that the deviation from the standards is necessary and reasonable and the resulting effect on the operation of the market is minimal.</p>	<p>need to do so by a market participant. <del>The Commission may also grant a market participant a temporary exemption (as prescribed in section 6.1) from these standards, provided that the deviation from the standards is necessary and reasonable and the resulting effect on the operation of the market is minimal.</del></p>	<p><b>EEAI:</b></p> <ul style="list-style-type: none"> <li>• EEA I agrees with the proposed changes.</li> </ul>	
	<p>4.3.1 General tariff bill file rules</p>	<p>None</p>	<p>Add new Section 4.3.1(7) and Section 4.3.1(8)</p> <p>(7) Electric distributors are not required to disclose all of the billing determinants nor charge details for transmission-connected sites, provided additional information in the form of a copy of the AESO invoice or the output from the AESO calculation tool is provided to the retailers at the same time the summarized tariff bill file charges are sent to the retailer.</p> <p>(8) Where the retailer of record changes for a transmission-connected site mid-month or a customer switch occurs for a transmission-connected site mid-month, the electric distributor is obligated to bill the retailer of record at</p>	<p><b>ENMAX Power:</b></p> <ul style="list-style-type: none"> <li>• Support</li> </ul> <p><b>ENMAX Encompass:</b></p> <ul style="list-style-type: none"> <li>• In favour</li> </ul> <p><b>EDTI:</b></p> <ul style="list-style-type: none"> <li>• EDTI has 2 concerns with the new requirements:             <ol style="list-style-type: none"> <li>1. Reference to “Customer” should be removed from the reasons described in comments to section 5.4.4 below.</li> <li>2. EDTI has built</li> </ol> </li> </ul>	

Section	Subsection	Existing	Proposed changes	Stakeholder comments	AUC response
			<p>month-end the full calendar month's charges. The electric distributor shall not split the charges at the retailer switch or at the customer switch.</p>	<p>its entire system on the enrollment, Retailer of Record each day. Therefore, if EDTI "is obligated to bill the retailer of record at month-end the full calendar month's charges", as stated in paragraph (8), then the tariff bill file will not be consistent with the billing period and will be noncompliant with AUC Rule 004 (black line version provided below), Section 2.7 Presentation of dates and Section 2.9 Present tariff charges to retailers. EDTI notes that it would incur significant costs to adjust its system to resolve the inconsistency between the tariff bill file and the</p>	

Section	Subsection	Existing	Proposed changes	Stakeholder comments	AUC response
				<p>bill period, and does not see any benefit of making the change.</p> <p><b>EEAI:</b></p> <ul style="list-style-type: none"> <li>In respect to the proposed wording for section 4.3.1 (8), EEA1 notes that existing TBF validations would fail any record where there are flow through charges for a period in which a retailer is not the retailer of record.</li> <li>Should these changes be implemented as proposed, EEA1 suggests the following additional wording:</li> <li>“In such cases, where the distributor bills a retailer for a full month of charges, despite the retailer at the end of the month not being the retailer of record for the same time period,</li> </ul>	

Section	Subsection	Existing	Proposed changes	Stakeholder comments	AUC response
				<p>the retailer of record at the end of the month will have the right to bill the customer the full month of charges.”</p> <ul style="list-style-type: none"> <li>• EEAI is requesting the additional language above to address the fact that this proposed wording is inconsistent with the current version of Rule 004, Rule 021 and EEAI’s Terms and Conditions. There is a high potential for customer confusion in regards to the potential discrepancy in billing charges and billing periods.</li> </ul>	
	4.3.5 Determinants - usage	<p>Table 4-5, Usage determinant content</p> <p>Usage Amount field (Sequence 16)</p> <p>Description: ... If Meter Type equals ‘C’ then, where metering information has been provided, Usage Amount must</p>	<p>Table 4-5, Usage determinant content</p> <p>Usage Amount field (Sequence 16)</p> <p>Description: ...If Meter Type = “C” then, where metering information has been provided, Usage Amount must be within</p>	<p><b>ENMAX Power:</b></p> <ul style="list-style-type: none"> <li>• Support</li> </ul> <p><b>ENMAX Encompass:</b></p> <ul style="list-style-type: none"> <li>• In favour</li> </ul> <p><b>EDTI:</b></p> <ul style="list-style-type: none"> <li>• EDTI has no</li> </ul>	

Section	Subsection	Existing	Proposed changes	Stakeholder comments	AUC response
		be within 0.5 kWh of the result of the following calculation: ...	0.5 kWh or <b>one GJ</b> of the result of the following calculation: ...	<p>concerns with the proposed changes.</p> <p><b>EEAI:</b></p> <ul style="list-style-type: none"> <li>• EEA I agrees with the proposed changes.</li> </ul>	
	4.3.9 One-time charge	None	<p><b>Production rules</b></p> <p>(5) Where a one-time charge is to recover costs for service work (e.g. energize requests) requested by a retailer who is no longer the retailer of record by the time the work is completed, the One-Time Charge record will be sent to the requesting retailer.</p>	<p><b>ENMAX Power:</b></p> <ul style="list-style-type: none"> <li>• Support, but would like clarification to ensure no TBDs get sent out.</li> <li>• EPC will populate the Charge Date in the OTC record to be equal to a date that the site was owned by the requesting Retailer. This will therefore not equal the date the work was completed in the field.</li> <li>• No cost estimate provided at this time, but this could change based on AUC clarification.</li> </ul> <p><b>ENMAX Encompass:</b></p> <ul style="list-style-type: none"> <li>• In favour</li> </ul>	

Section	Subsection	Existing	Proposed changes	Stakeholder comments	AUC response
				<p><b>EDTI:</b></p> <ul style="list-style-type: none"> <li>EDTI has no concerns with the proposed changes.</li> </ul> <p><b>EEAI:</b></p> <ul style="list-style-type: none"> <li>EEAI agrees with the proposed changes.</li> </ul>	
	4.10 Customer Switch Advice (CSA) transaction	<p>Footnote 11 reads:</p> <p>Unique circumstances for ENMAX Energy Corporation only—otherwise termination of electric services results in an enrollment/ de-enrollment transaction between retailers.</p>	Delete Footnote 11.	<p><b>ENMAX Power:</b></p> <ul style="list-style-type: none"> <li>Support</li> </ul> <p><b>ENMAX Encompass:</b></p> <ul style="list-style-type: none"> <li>In favour</li> </ul> <p><b>EDTI:</b></p> <ul style="list-style-type: none"> <li>EDTI has no concerns with the proposed changes.</li> </ul>	
		<p>2) (b) the end of the requested effective date if the distributor accepts backdated CSA transactions, as disclosed in Appendix H, and the requested effective date is within the boundaries established by the distributor.</p>	<p>2) b) the end of the requested effective date if the distributor accepts backdated CSA transactions, as disclosed in Appendix H, and the requested effective date is within the boundaries established by the distributor.</p>	<p><b>ENMAX Power:</b></p> <ul style="list-style-type: none"> <li>Support</li> </ul> <p><b>ENMAX Encompass:</b></p> <ul style="list-style-type: none"> <li>In favour</li> </ul> <p><b>EDTI:</b></p> <ul style="list-style-type: none"> <li>EDTI has no concerns with the proposed changes.</li> </ul>	

Section	Subsection	Existing	Proposed changes	Stakeholder comments	AUC response
				<b>EEAI:</b> <ul style="list-style-type: none"> <li>EEAI agrees with the proposed changes.</li> </ul>	
	Table 4-18. Customer Switch Receipt (CSR) transaction content	Appendix B	All references to Appendix B have been changed to Appendix <b>A</b>	<b>ENMAX Power:</b> <ul style="list-style-type: none"> <li>Support</li> </ul> <b>ENMAX Encompass:</b> <ul style="list-style-type: none"> <li>In favour</li> </ul> <b>EDTI:</b> <ul style="list-style-type: none"> <li>EDTI has no concerns with the proposed changes.</li> </ul> <b>EEAI:</b> <ul style="list-style-type: none"> <li>EEAI agrees with the proposed changes.</li> </ul>	
	NEW 4.12 Tariff billing sites withheld (TSW) transaction (Section F2.1 and Table F2-1 in Appendix F, Optional transactions being moved to 4.12)	Section F2.1 The TSW transaction enables a distributor to inform a retailer of sites withheld from presentation in a published tariff bill file in an automated fashion. This transaction is utilized to communicate to a retailer of standard content validation tests and production failures for a specific site. The contents of the TSW transaction are provided in Table F2-1.	Section <b>4.12</b> The TSW transaction enables a distributor to inform a retailer of sites withheld from presentation in a published tariff bill file in an automated fashion. This transaction is utilized to communicate to a retailer of standard content validation tests and production failures for a specific site. The contents of the TSW transaction are provided in <b>Table 4-19</b> .	<b>ENMAX Power:</b> <ul style="list-style-type: none"> <li>TSW is currently an optional transaction. We are not aware of any WG meetings to discuss making this mandatory.</li> <li>It is more complex in practice to define what sites should be included in the TSW.</li> </ul>	

Section	Subsection	Existing	Proposed changes	Stakeholder comments	AUC response
				<ul style="list-style-type: none"> <li>○ Competing Tariff Bill File events occur within days of each other causes challenges.</li> <li>○ New sites being energized after the cycle was read and before TBF transmitted.</li> <li>● Should only sites that fail internal validation be sent in the TSW?</li> <li>● Without knowing the exact production rules that would require a TSW, EPC estimates this change would cost \$260k. This cost could increase with clarity on the rule.</li> <li>● EPC recommends that only sites that fail internal validation be included in the TSW.</li> </ul> <p><b>ENMAX Encompass:</b></p> <ul style="list-style-type: none"> <li>● In favour</li> </ul>	

Section	Subsection	Existing	Proposed changes	Stakeholder comments	AUC response
				<p><b>EDTI:</b></p> <ul style="list-style-type: none"> <li>EDTI has no concerns with the proposed changes.</li> </ul> <p><b>ATCO Electric:</b></p> <ul style="list-style-type: none"> <li>AE questions the value of making this TXN mandatory. Note that RIM issue 460 determined that the TXN was not worth implementing.</li> <li>RIM Issue 460 Resolution: At the Code Revision Working Group meeting held on April 19, 2007, stakeholders agreed the TSW transaction is a “nice to have” enhancement to the Code. In addition, stakeholders confirmed they have the means of determining sites withheld from billing utilizing the distributor’s SCF</li> </ul>	

Section	Subsection	Existing	Proposed changes	Stakeholder comments	AUC response
				<p>and TCF files. Consequently, it was determined that the cost and effort of implementing this transaction outweighs the tangible benefits. The transaction remain optional for distributors.</p> <p><b>ATCO Gas:</b></p> <ul style="list-style-type: none"> <li>• Additional TSW reason code required for TBFs held due to a recent retailer switch.</li> </ul> <p><b>EEAI:</b></p> <ul style="list-style-type: none"> <li>• EEA I agrees with the proposed changes.</li> </ul> <p><b>FortisAlberta:</b></p> <ul style="list-style-type: none"> <li>• TSW: We support the move to require TSWs only in the situation where a cancel/rebill is underway and cannot be completed by the site's next</li> </ul>	

Section	Subsection	Existing	Proposed changes	Stakeholder comments	AUC response
				<p>scheduled bill date. We have visibility of these blocked sites and the intent is to create manual transactions for those few instances where a site is still blocked when it is scheduled to be billed. As there are so few times when this situation would be encountered, it is not prudent to design an automated system and so our intent would be to create manual transactions, once the transaction is defined. As this would require manual intervention, we propose a service level of two business days from the scheduled bill date to the creation and delivery of the TSW. We propose that the</p>	

Section	Subsection	Existing	Proposed changes	Stakeholder comments	AUC response
				<p>reason codes should closely mirror the existing cancel reason codes, i.e. investigating a potential site ownership correction, investigating a potential rate correction, investigating a potential meter read correction, investigating a potential crossed meter situation, investigating a potential multiplier correction, and an “other” for something we didn’t anticipate.</p>	
		<p>Table F2-1, Tariff Billing Sites Withheld (TSW) Transaction Content</p> <p><b>Production rules</b></p> <p>The following production rules apply for the TSW transaction:</p> <ol style="list-style-type: none"> <li>1) Data contained within the TSW transaction must adhere to the field level rules stated in Table F2-1.</li> <li>2) Distributors must submit a TSW transaction on the same day as the tariff bill</li> </ol>	<p>Move Table F2-1 to new Section 4.12 and rename it <b>Table 4-19</b>, Tariff billing sites withheld (TSW) transaction content</p> <p><b>Production rules</b></p> <p>The following production rules apply for the TSW transaction:</p> <ol style="list-style-type: none"> <li>(1) Data contained within the TSW transaction must adhere to the field level rules stated in <b>Table 4-19</b>.</li> <li>(2) Distributors must submit a TSW transaction on the same</li> </ol>	<p><b>ENMAX Power:</b></p> <ul style="list-style-type: none"> <li>• See above comment</li> </ul> <p><b>ENMAX Encompass:</b></p> <ul style="list-style-type: none"> <li>• In favour</li> </ul> <p><b>EDTI:</b></p> <ul style="list-style-type: none"> <li>• EDTI has no concerns with the proposed</li> </ul>	

Section	Subsection	Existing	Proposed changes	Stakeholder comments	AUC response
		<p>file.</p> <p>3) A TSW transaction should be created for each Site Withheld Reason Code that has occurred.</p> <p>4) Sites withheld are not included in the Tariff Bill File</p>	<p>day as the tariff bill file.</p> <p>(3) A TSW transaction should be created for each reason code the site is being withheld.</p> <p>(4) Sites withheld are not included in the tariff bill file.</p>	<p>changes.</p> <p><b>EEAI:</b></p> <ul style="list-style-type: none"> <li>EEAI agrees with the proposed changes.</li> </ul>	
5 Validation and exception handling	5.4.1 General Cancel/Rebill Production Rules	<p>1) Cancels and rebills may be issued for tariff-based charges and one-time charges. The cancel and rebill of tariff-based charges is independent from the cancel and rebill of one-time charges for the same site and time period.</p> <p>2) Where possible, a distributor must attempt to send the tariff bill period or one-time charge rebill records in the same tariff bill file as the associated cancel records. Exceptions for prior period adjustments should be rare.</p> <p>3) Original or rebilled charges presented within a tariff bill file cannot be cancelled within the same tariff bill file (i.e., no redundant charge and cancel presentation).</p> <p>4) All cancel/rebills processed by a distributor must be sent to retailers as part of a tariff bill file</p>	<p>(1) Cancels and rebills may be issued for tariff-based charges and one-time charges. The cancel and rebill of tariff-based charges is independent from the cancel and rebill of one-time charges for the same site and time period.</p> <p>(2) <del>Where possible,</del> A distributor must attempt to send the tariff bill period or one-time charge rebill records in the same tariff bill file as the associated cancel records. The only exception to this requirement is if the rebill will never be forthcoming.</p> <p>(3) If the need for a cancel and rebill has been identified, the distributor must send the cancel and rebill within the timeframes prescribed in Table 2-1. Should an actual meter read not be available within the prescribed timeframes, an estimate may be used for creating the rebill. If a rebill will not be produced by the site's next scheduled</p>	<p><b>ENMAX Power:</b></p> <ul style="list-style-type: none"> <li>Seeking clarification. Point 3 is confusing. Talking about estimates in one sentence and then suddenly referencing the TSW. I'm not sure we would know if a rebill was not going to be produced by the site's next scheduled tariff bill file publish date.</li> <li>EPC asks that the language be clarified in this section and then sent back so we can do proper analysis.</li> </ul> <p><b>ENMAX Encompass:</b></p> <ul style="list-style-type: none"> <li>In favour</li> </ul>	

Section	Subsection	Existing	Proposed changes	Stakeholder comments	AUC response
		<p>according to the record production sequence outlined in Appendix B.</p>	<p>tariff bill file publish date, the distributor must send a tariff billing sites withheld transaction (TSW) on the site's scheduled tariff bill file publish date as described in Section 4.12.</p> <p>(4) Original or rebilled charges presented within a tariff bill file cannot be cancelled within the same tariff bill file (i.e. no redundant charge and cancel presentation).</p> <p>(5) All cancels and rebills identified and processed by a distributor within a year of the original charges must be sent to retailers as part of a tariff bill file according to the record production sequence outlined in Appendix A.</p> <p>(6) All cancels and rebills identified and processed by a distributor more than a year after sending the original charges must be sent to retailers as part of a tariff bill file according to the requirements in Section 5.4.4.</p> <p>(7) Cancels or cancels and rebills of tariff-based charges and one-time charges for site IDs no longer in use must use the site IDs contained in the original charge records.</p>	<p><b>EDTI:</b></p> <ul style="list-style-type: none"> <li>EDTI has 2 concerns with these new requirements</li> <li>One has to do with retaining 3 years of tariff billing data in its original format. EDTI's concerns with this requirement are explained in section 2.16 above</li> <li>The second concern has to do the mention of customers this concern is explained in section 5.4.4.</li> </ul> <p><b>ATCO Electric:</b></p> <ul style="list-style-type: none"> <li>AE requests some time to study this change and provide feedback to the AUC .</li> <li>AEs initial thoughts are that this process would require manual handling of most cancel-</li> </ul>	

Section	Subsection	Existing	Proposed changes	Stakeholder comments	AUC response
				<p>rebills resulting in higher processing costs.</p> <p><b>EEAI:</b></p> <ul style="list-style-type: none"> <li>Refer to comments for Section 5.4.4</li> </ul> <p><b>FortisAlberta:</b></p> <ul style="list-style-type: none"> <li>Cancelling back up to 3 years unless a customer complains to their retailer: We are not supportive of setting out different rules based on whether the customer complains. From a customer service perspective, we hold that all customers should be treated equally, whether or not they complain. From a practical perspective, we aren't clear on how we could design a system to accommodate this</li> </ul>	

Section	Subsection	Existing	Proposed changes	Stakeholder comments	AUC response
				<p>dichotomy. While we understand that customers will seek a full credit back to the time of an error, we do not believe customers or retailers would be impressed with the discovery that any under-charge can be charged back three or more years. As noted earlier, back-billing beyond one year violates our current Terms and Conditions and Section 17 of the Regulated Rate Option regulation.</p> <ul style="list-style-type: none"> <li>FortisAlberta has used SAP IS-U since August 2003. All our metering and billing information and calculations are done in IS-U and the full ten years and counting is active; currently nothing is archived. There is a cause and effect relationship</li> </ul>	

Section	Subsection	Existing	Proposed changes	Stakeholder comments	AUC response
				<p>between metering and billing and, in our case, both metering information and billing information are housed in IS-U. If we needed to limit bill correction to a 3 year timeframe, we would need to develop some way of separating the cause and effect relationship between metering and billing after that 3 year milestone. As the SSC requires PFAM correction back as far as 8 years, we would need to cancel back the meter information potentially up to 8 years, but not cancel and replace the billing information beyond three. This, in itself, will be very complex, with an IT ballpark estimate of \$750K to \$1M. To add in</p>	

Section	Subsection	Existing	Proposed changes	Stakeholder comments	AUC response
				<p>the additional request that we have the optional ability to adjust that freeze period beyond three years in certain situations will add more complexity and cost to the effort.</p> <ul style="list-style-type: none"> <li>Please note that this estimate does not include the effort that would be required for the other proposed changes, including a mandatory universal price split, mandatory cancel and replacement in the same file, and the development of the TSW. The all-in ballpark cost estimate would be in the \$1.5M-\$2M range and the project would require most of 2014 to allow for a 2015 implementation.</li> </ul>	
	5.4.4 Charges Relating to	As each distributor is expected to implement unique	Delete Section 5.4.4, Charges Relating to Pre-implementation	<p><b>ENMAX Power</b></p> <ul style="list-style-type: none"> <li>Support</li> </ul>	

Section	Subsection	Existing	Proposed changes	Stakeholder comments	AUC response
	Pre-implementation Periods	data conversion strategies, a standard approach to presenting adjustments for pre-implementation charges is not a requirement of this code. Appendix E outlines the process for the distributor to initiate and process adjustments for pre-implementation periods.	Periods	<b>ENMAX Encompass:</b> <ul style="list-style-type: none"> <li>In favour</li> </ul>	
	NEW 5.4.4 Cancels and rebills of charges more than a year old	None	<p>(1) In situations where rebills will be of dollar amounts in total greater than the original charges, the following rules apply:</p> <p>(a) The distributor is not allowed to recover any amounts the retailer was undercharged relating to any periods older than 12 months from the date the tariff bill file will be published.</p> <p>(b) Some distributors may choose to cancel and rebill charge periods more than a year prior to the tariff bill file publish date. For those that do, the amounts the retailer was undercharged relating to those periods must be reversed using one or more one-time charges as described in Section 4.3.9. All dates in the Charge Date field in the</p>	<b>ENMAX Power</b> <ul style="list-style-type: none"> <li>EPC does not support this proposed rule change due to the level of complexity and corresponding costs and time it will take to implement.</li> <li>(1)(a) Please confirm the date logic used to define “The date the tariff bill file will be published”? The TBF publish date does not reflect when the customer was last billed and our system is using the Tariff Billing Period End Date as the start point to calculate the</li> </ul>	

Section	Subsection	Existing	Proposed changes	Stakeholder comments	AUC response
			<p>One-Time Charge records must match the Charge Period End Dates in the rebilled charges, and there must be a One-Time Charge record for each charge period.</p> <p>(2) In situations where rebills will be of dollar amounts in total less than the original charges and the date the error occurred is within three years prior to the date the tariff bill file will be published, the following rules apply:</p> <p>(a) The distributor is required to refund the amounts the retailer was overcharged relating to any periods back to the date the error occurred.</p> <p>(b) The distributor is required to cancel and rebill according to the production rules described in Section 5.4.1.1.</p> <p>(3) In situations where rebills will be of dollar amounts in total less than the original charges, the date the error occurred is greater than three years prior to the date the tariff bill file will be published and the customer who would be the one eligible to receive the refund from the retailer is</p>	<p>periods beyond a year. Changes will be required if TBF published date is to be used instead.</p> <ul style="list-style-type: none"> <li>• (2) Please confirm the date logic used to determine the 3 year period.</li> <li>• (2)(a) If there are instances where the rebill periods have been under charged (past 1 year) can the same process be followed at point 1b where OTCs are applied to offset the amount?</li> <li>• (3) this will pose a challenge for us as our billing system is designed to calculate data solely by retailer and is not used to store end customer information. As a Wire Owner we do not own the billing relationship with the end customer therefore we do</li> </ul>	

Section	Subsection	Existing	Proposed changes	Stakeholder comments	AUC response
			<p>not the same as is currently at the site, the following rules apply:</p> <p>(a) The distributor is required to refund the amounts the retailer was overcharged relating to any periods back to three years from the date the tariff bill file will be published.</p> <p>(b) The distributor is required to cancel and rebill according to the production rules described in Section 5.4.1.1.</p> <p>(4) In situations where rebills will be of dollar amounts in total less than the original charges, the date the error occurred is greater than three years prior to the date the tariff bill file will be published and the customer who would be the one eligible to receive the refund from the retailer is the same as is currently at the site, the following rules apply:</p> <p>(a) The distributor is required to refund the amounts the retailer was overcharged relating to any periods back to the date the error occurred.</p> <p>(b) For periods within three</p>	<p>not store this information in our system.</p> <ul style="list-style-type: none"> <li>• (3)(a) As stated in point 1b, can distributors choose to cancel/rebill past 3 years and offset any amounts with OTCs?</li> <li>• (4) Same issues and challenges as point 3. Does Section 4 assume that there has been only 1 retailer? What happens if same customer has switched Retailers? What happens with the TBF data for the other Retailers? What guarantees are there that any Retailer (including the current) would refund money outside of their own Ts &amp; Cs?</li> <li>• (4)(c) Please define the alignment of the single OTC effective date? For example if multiple retailer</li> </ul>	

Section	Subsection	Existing	Proposed changes	Stakeholder comments	AUC response
			<p>years prior to the date the tariff bill file will be published, the distributor is required to cancel and rebill according to the production rules described in Section 5.4.1.1.</p> <p>(c) For periods greater than three years prior to the date the tariff bill file will be published and for which the same customer would be the one eligible to receive the refund from the retailer as is currently at the site, the distributor will provide a refund in a single One-Time Charge record that is based on the average annual refund for the most recent three years.</p>	<p>switches existed prior to 3 yrs and the current retailer may have not been billed yet.</p> <ul style="list-style-type: none"> <li>Significant system changes are required. At this time we need more clarity to provide a cost estimate.</li> </ul> <p><b>ENMAX Encompass:</b></p> <ul style="list-style-type: none"> <li>Needs to apply to consumption as well as tariff charges. Cannot adjust one without the other.</li> </ul> <p><b>EDTI</b></p> <ul style="list-style-type: none"> <li>EDTI has major concerns with the third and fourth paragraph of this new requirement. Paragraph 3 and 4 state: "In situations where... the customer who would be the one eligible to receive the refund from the retailer is not the same as is</li> </ul>	

Section	Subsection	Existing	Proposed changes	Stakeholder comments	AUC response
				<p>currently at the site.." A customer is defined in the Electric Utility Act as "a person purchasing electricity for the person's own use". As a distributor, EDTI deals with the retailer and does not have any information relating to the person purchasing electricity for their own use. As such, EDTI would be unable to comply with the proposed change because it does not have access to the information necessary to be compliant.</p> <p><b>ATCO Electric:</b></p> <ul style="list-style-type: none"> <li>• ATCO Electric has no concerns for smaller sites such as RRO sites. Our concerns are with respect to larger sites (e.g.</li> </ul>	

Section	Subsection	Existing	Proposed changes	Stakeholder comments	AUC response
				<p>industrial, and large commercial) where we have seen instances of annual adjustments &gt; \$500k. This is far too much risk to incur and would result in a direct revenue loss to AE.</p> <ul style="list-style-type: none"> <li>• AE proposes a balanced model for all sites or alternatively, a balanced model for large sites (high usage) such as 2 years and 2 years. AE does not support the debit/credit limits as presented. Note: Sites that are billed with reliance on 3<sup>rd</sup> party data such as transmission sites should to be excluded from the debit/credit rules.</li> </ul> <p><b>ATCO Gas:</b></p> <ul style="list-style-type: none"> <li>• ATCO Gas disputes, and did dispute in AUC meetings, that</li> </ul>	

Section	Subsection	Existing	Proposed changes	Stakeholder comments	AUC response
				<p>credits are to be provided back to the customer to point of error, while debit can only be 12 months. As explained, ATCO Gas installs meters at new sites based on service address labeling of internal house piping made by the owner/builder. The owner, not ATCO Gas, is responsible for internal house piping and initial light up.</p> <ul style="list-style-type: none"> <li>In addition, for commercial sites, mixed meters occur most often because the owner is reconfiguring bays on the customer's side of the meter. As customers are responsible for piping and facilities on their side of the meter, ATCO Gas is not informed that piping is now</li> </ul>	

Section	Subsection	Existing	Proposed changes	Stakeholder comments	AUC response
				<p>going to another meter.</p> <ul style="list-style-type: none"> <li>• Our Terms and Conditions state that the customer is responsible for facilities on their side of the meter.</li> <li>• ATCO Gas proposes, given that mixed meters are not the distributor's error that the debit and credit be limited to the same 12 month period for mixed meter situations.</li> <li>• Can we have a reference included that states distributors are to base cancel/rebill corrections on UCI data provided by Retailers.</li> <li>• (4) Are distributors to credit back to the customer start date or the date the error occurred if the error started before the customer enrolled? (4c) Is refund based on</li> </ul>	

Section	Subsection	Existing	Proposed changes	Stakeholder comments	AUC response
				<p>usage or dollars?</p> <ul style="list-style-type: none"> <li>• Are the debit/credit rules only related to usage related charges? What about Franchise Fee corrections? (Can these be done outside of a TBF? i.e. issue a cheque directly to the current site customer)</li> </ul> <p><b>EEAI:</b></p> <ul style="list-style-type: none"> <li>• EEAI agrees with the proposed changes to Section 5.4.4 in that credits would be provided for any period less than 3 years.</li> <li>• However, EEAI is indifferent regarding whether credits greater than 24 months are dealt with through a cancel/rebill or through a One-Time-Credit. EEAI proposes that credits for periods less than 24 months be done</li> </ul>	

Section	Subsection	Existing	Proposed changes	Stakeholder comments	AUC response
				<p>through cancel/rebills, while outstanding credits greater than 24 months be provided in either cancel/rebill format or as a One-Time Credit at the distributor's discretion, based on distributor's system capabilities.</p> <ul style="list-style-type: none"> <li>Also, EEAI proposes that debits would be provided for any period less than 11 months as this would align with the rules set out in Rule 021 regarding the processing of PFAMs which is 11 months.</li> </ul>	
6 Readiness	<b><i>No changes in this section.</i></b>				
7 Self-certification	<b><i>No changes in this section.</i></b>				
8 Future code topics		<p>It is contemplated that future versions of this code will provide standard procedures for the following:</p> <ol style="list-style-type: none"> <li>1) imposing an administrative charge on a retailer by</li> </ol>	Delete Section 8, Future code topics	<p><b>ENMAX Power</b></p> <ul style="list-style-type: none"> <li>Support</li> </ul> <p><b>ENMAX Encompass:</b></p> <ul style="list-style-type: none"> <li>In favour</li> </ul>	

Section	Subsection	Existing	Proposed changes	Stakeholder comments	AUC response
		<p>distributors if the Commission considers the action or complaint of a retailer related to this code to be frivolous or vexatious;</p> <ol style="list-style-type: none"> <li>2) application of marketwide standard usage estimation methodologies and tolerance levels;</li> <li>3) aligning usage estimation methodology between settlement and tariff billing processes;</li> <li>4) cancel/rebill processing to correct usage and tariff charges following the use of a usage estimate;</li> <li>5) reporting, resolving, and/or escalating code-related infractions, including roles and responsibilities, contact information and the procedures for direct inquiry, direct complaint, and escalation to the Commission;</li> <li>6) monitoring and reporting code compliance;</li> <li>7) assessing penalties and awarding remedies for noncompliance; and</li> <li>8) processing cancel/rebills &gt; 365 days old for regulated rate customers.</li> </ol>		<p><b>EDTI:</b></p> <ul style="list-style-type: none"> <li>• EDTI has no concerns with the proposed changes.</li> </ul> <p><b>EEAI:</b></p> <ul style="list-style-type: none"> <li>• EEAI agrees with the proposed changes</li> </ul>	
Appendix A Estimation Methodology &		Appendix A	Delete Appendix A	<p><b>ENMAX Power</b></p> <ul style="list-style-type: none"> <li>• Support</li> </ul>	

Section	Subsection	Existing	Proposed changes	Stakeholder comments	AUC response
Validation Thresholds				<b>EDTI:</b> <ul style="list-style-type: none"> <li>EDTI has no concerns with the proposed changes.</li> </ul> <b>EEAI:</b> <ul style="list-style-type: none"> <li>EEAI agrees with the proposed changes</li> </ul>	
Appendix B Information Exchange Standards		Appendix B	Becomes Appendix <b>A</b>	<b>EDTI:</b> <ul style="list-style-type: none"> <li>EDTI has no concerns with the proposed changes.</li> </ul> <b>EEAI:</b> <ul style="list-style-type: none"> <li>EEAI agrees with the proposed changes</li> </ul>	
	B4.2.1 Files Transmitted Electronically	<p>TXN: three-letter abbreviation for the transaction name (e.g., Tariff Bill Accept = TBA) or file name (e.g., Tariff Bill File = TBF)</p> <p>Sender: ID of the sender (i.e., Distributor ID of the distributor responsible for the site(s) or Retailer ID)</p> <p>Recipient: ID of the recipient (i.e., Distributor ID of the distributor receiving the file or transaction or Retailer ID)</p> <p>YYYYMMDD: Date the file</p>	<p>TXN: three-letter abbreviation for the transaction name (e.g. Tariff Bill Accept = TBA) or file name (e.g. Tariff Bill File = TBF). <b>This must be in uppercase.</b></p> <p>Sender: ID of the sender (i.e. Distributor ID of the distributor responsible for the site(s) or Retailer ID).</p> <p>Recipient: ID of the recipient (i.e. Distributor ID of the distributor receiving the file or transaction or Retailer ID)</p> <p>YYYYMMDD: Date the file was</p>	<b>ENMAX Power</b> <ul style="list-style-type: none"> <li>Support</li> </ul> <b>ENMAX Encompass:</b> <ul style="list-style-type: none"> <li>In favour</li> </ul> <b>EDTI:</b> <ul style="list-style-type: none"> <li>EDTI has no concerns with the proposed changes.</li> </ul> <b>EEAI:</b>	

Section	Subsection	Existing	Proposed changes	Stakeholder comments	AUC response
		<p>was created (e.g., 20041202)</p> <p>HHMISS: Time the file was created on a 24-hour clock (e.g., 192432)</p>	<p>created (e.g. 20041202).</p> <p>HHMISS: Time the file was created on a 24-hour clock (e.g. 192432).</p> <p><b>.CSV .CSV or .csv</b></p>	<ul style="list-style-type: none"> <li>• EEAI agrees with the proposed changes</li> </ul>	
	<p>B4.2.2 Files Available for Download</p>	<p>TXN: three-letter abbreviation for the transaction name (e.g., Tariff Bill Accept = TBA) or file name (e.g., Tariff Bill File = TBF)</p> <p>Sender: ID of the sender (e.g., Distributor ID of the distributor responsible for the site(s) or Retailer ID)</p> <p>YYYYMMDD: Date the file was created (e.g., 20041202)</p> <p>HHMISS: Time the file was created on a 24-hour clock (e.g., 192432)</p>	<p>TXN: three-letter abbreviation for the transaction name (e.g. Tariff Bill Accept = TBA) or file name (e.g. Tariff Bill File = TBF).</p> <p><b>This must be in uppercase.</b></p> <p>Sender: ID of the sender (e.g. Distributor ID of the distributor responsible for the site(s) or Retailer ID).</p> <p>YYYYMMDD: Date the file was created (e.g. 20041202).</p> <p>HHMISS: Time the file was created on a 24-hour clock (e.g. 192432).</p> <p><b>.CSV .CSV or .csv</b></p>	<p><b>ENMAX Power</b></p> <ul style="list-style-type: none"> <li>• Support</li> </ul> <p><b>ENMAX Encompass:</b></p> <ul style="list-style-type: none"> <li>• In favour</li> </ul> <p><b>EDTI:</b></p> <ul style="list-style-type: none"> <li>• EDTI has no concerns with the proposed changes.</li> </ul> <p><b>EEAI:</b></p> <ul style="list-style-type: none"> <li>• EEAI agrees with the proposed changes</li> </ul>	
	<p>B5.11 Tariff Rate Code</p>	<p>Table B5-8</p> <p>Tariff Rate Code field</p> <p>Description:</p> <p>MANDATORY FIELD – Code to identify a distributor’s approved tariff.</p>	<p>Table <b>A</b>5-8</p> <p>Tariff Rate Code field</p> <p>Description:</p> <p>MANDATORY FIELD – Code to identify a distributor’s approved tariff. <b>Each code within the TRC file must be unique.</b></p>	<p><b>ENMAX Power</b></p> <ul style="list-style-type: none"> <li>• Support</li> </ul> <p><b>ENMAX Encompass:</b></p> <ul style="list-style-type: none"> <li>• In favour</li> </ul> <p><b>EDTI:</b></p> <ul style="list-style-type: none"> <li>• EDTI has no concerns with the proposed changes.</li> </ul>	

Section	Subsection	Existing	Proposed changes	Stakeholder comments	AUC response
				<b>EEAI:</b> <ul style="list-style-type: none"> <li>EEAI agrees with the proposed changes</li> </ul>	
	B5.18 Tariff Cross Reference Codes	Table B5-15 Tariff Rate Code field Description: MANDATORY FIELD – Code to identify a distributor’s approved tariff.	Table A5-15 Tariff Rate Code field Description: MANDATORY FIELD – Code to identify a distributor’s approved tariff. Each code within the TRF file must be unique.	<b>ENMAX Power</b> <ul style="list-style-type: none"> <li>Support</li> </ul> <b>ENMAX Encompass:</b> <ul style="list-style-type: none"> <li>In favour</li> </ul> <b>EDTI:</b> <ul style="list-style-type: none"> <li>EDTI has no concerns with the proposed changes.</li> </ul> <b>EEAI:</b> <ul style="list-style-type: none"> <li>EEAI agrees with the proposed changes</li> </ul>	
	B5.21 Component Type Code	Table B5-18 Component Type Code field Description: MANDATORY FIELD – Standardized code to represent a distributor’s charge component.	Table A5-18 Component Type Code field Description: MANDATORY FIELD – Standardized code to represent a distributor’s charge component. Each code within the CTF file must be unique.	<b>ENMAX Power</b> <ul style="list-style-type: none"> <li>Support</li> </ul> <b>ENMAX Encompass:</b> <ul style="list-style-type: none"> <li>In favour</li> </ul> <b>EDTI:</b> <ul style="list-style-type: none"> <li>EDTI has no concerns with the proposed changes.</li> </ul>	

Section	Subsection	Existing	Proposed changes	Stakeholder comments	AUC response
				<p><b>EEAI:</b></p> <ul style="list-style-type: none"> <li>EEAI agrees with the proposed changes</li> </ul>	
	<p>B5.22 One-Time Charge Code</p>	<p>Each distributor will maintain its respective One-Time Charge Codes via a One-Time Charge Code File (OCF) and provide this to the Commission for publication, to fulfill the requirements of the One-Time Charge Code field of the tariff bill file. The contents of the One-Time Charge Code File are shown in Table B5-19.</p> <p>Table B5-19</p> <p>One-time Charge Code field</p> <p><b>MANDATORY FIELD –</b> Standardized code to represent a distributors’ one-time charge.</p>	<p>Each distributor will maintain its respective one-time charge codes via a one-time charge code file (OCF) and provide this to the Commission for publication, to fulfill the requirements of the One-Time Charge Code field of the tariff bill file. The contents of the OCF are shown in Table A5-19.</p> <p><b>Each distributor must include the code “PPAD” (prior period adjustment) in their OCF to be used in cases where the one-time charge is not current and may not belong to the current customer, requiring further investigation by the retailer before including on the customer’s invoice.</b></p> <p>Table A5-19</p> <p>One-Time Charge Code field</p> <p><b>MANDATORY FIELD –</b> Standardized code to represent a distributors’ one-time charge. <b>Each code within the OCF file must be unique.</b></p>	<p><b>ENMAX Power</b></p> <ul style="list-style-type: none"> <li>I don’t think this was discussed in any working group meetings and is a little confusing. Is the PPAD required in the scenario in section 4.3.9 where a retailer switch has occurred between the time a service order was initiated and the day the work was completed?</li> <li>Requires system work, but difficult to quantify as not certain of the logic.</li> <li>Need to ensure that these changes do not result in TBDs being sent in error on OTCs.</li> </ul> <p><b>ENMAX Encompass:</b></p> <ul style="list-style-type: none"> <li>In favour</li> </ul>	

Section	Subsection	Existing	Proposed changes	Stakeholder comments	AUC response
				<p><b>EDTI:</b></p> <ul style="list-style-type: none"> <li>The distributor should not be responsible to include the PPAD cod in their OCF. As described in section 5.4.4, the distributor does not have access to customer information and therefore cannot determine when to use this code.</li> </ul> <p><b>EEAI:</b></p> <ul style="list-style-type: none"> <li>EEAI defers to EDTI on this issues.</li> </ul>	
	<p>B5.23 Miscellaneous Determinant Code</p>	<p>Table B5-20 Miscellaneous Determinant Code field Description: MANDATORY FIELD – Standardized Code to represent a miscellaneous determinant disclosed in a tariff bill file.</p>	<p>Table A5-20 Miscellaneous Determinant Code field Description: MANDATORY FIELD – Standardized code to represent a miscellaneous determinant disclosed in a tariff bill file. Each code within the MDF file must be unique.</p>	<p><b>ENMAX Power</b></p> <ul style="list-style-type: none"> <li>Support</li> </ul> <p><b>ENMAX Encompass:</b></p> <ul style="list-style-type: none"> <li>In favour</li> </ul> <p><b>EDTI:</b></p> <ul style="list-style-type: none"> <li>EDTI has no concerns with the proposed changes.</li> </ul>	

Section	Subsection	Existing	Proposed changes	Stakeholder comments	AUC response
	NEW A5.28 Site withheld Reason code for the TSW		Table A5-25, Site withheld reason codes (See attached black line Rule 004 showing proposed changes.)	<p><b>EEAI:</b></p> <ul style="list-style-type: none"> <li>EEAI agrees with the proposed changes</li> </ul> <p><b>ENMAX Power</b></p> <ul style="list-style-type: none"> <li>The description are mostly intended for PFAM adjustments and do not represent the reasons why a site is being withheld for billing</li> </ul> <p><b>ENMAX Encompass:</b></p> <ul style="list-style-type: none"> <li>In favour</li> </ul> <p><b>EDTI:</b></p> <ul style="list-style-type: none"> <li>EDTI has no concerns with the proposed changes.</li> </ul> <p><b>EEAI:</b></p> <ul style="list-style-type: none"> <li>EEAI agrees with the proposed changes</li> </ul>	
Appendix C Description of Attributing Time to Meter Readings			Remove Appendix C	<p><b>ENMAX Power</b></p> <ul style="list-style-type: none"> <li>Support</li> </ul> <p><b>ENMAX Encompass:</b></p> <ul style="list-style-type: none"> <li>In favour</li> </ul>	

Section	Subsection	Existing	Proposed changes	Stakeholder comments	AUC response
				<p><b>EDTI:</b></p> <ul style="list-style-type: none"> <li>EDTI has no concerns with the proposed changes.</li> </ul> <p><b>EEAI:</b></p> <ul style="list-style-type: none"> <li>EEAI agrees with the proposed changes</li> </ul>	
Appendix D Approach to Usage Estimate Corrections			Remove Appendix D	<p><b>ENMAX Power</b></p> <ul style="list-style-type: none"> <li>Support</li> </ul> <p><b>ENMAX Encompass:</b></p> <ul style="list-style-type: none"> <li>In favour</li> </ul> <p><b>EDTI:</b></p> <ul style="list-style-type: none"> <li>EDTI has no concerns with the proposed changes.</li> </ul> <p><b>EEAI:</b></p> <ul style="list-style-type: none"> <li>EEAI agrees with the proposed changes</li> </ul>	
Appendix E Pre-implementation Charge Presentation			Remove Appendix E	<p><b>ENMAX Power</b></p> <ul style="list-style-type: none"> <li>Support</li> </ul> <p><b>ENMAX Encompass:</b></p> <ul style="list-style-type: none"> <li>In favour</li> </ul>	

Section	Subsection	Existing	Proposed changes	Stakeholder comments	AUC response
				<p><b>EDTI:</b></p> <ul style="list-style-type: none"> <li>EDTI has no concerns with the proposed changes.</li> </ul> <p><b>EEAI:</b></p> <ul style="list-style-type: none"> <li>EEAI agrees with the proposed changes</li> </ul>	
Appendix F Optional Transactions			Remove Appendix F	<p><b>ENMAX Power</b></p> <ul style="list-style-type: none"> <li>Support</li> </ul> <p><b>ENMAX Encompass:</b></p> <ul style="list-style-type: none"> <li>In favour</li> </ul> <p><b>EDTI:</b></p> <ul style="list-style-type: none"> <li>EDTI has no concerns with the proposed changes.</li> </ul> <p><b>EEAI:</b></p> <ul style="list-style-type: none"> <li>EEAI agrees with the proposed changes</li> </ul>	
Appendix G Cancel/Rebill Methodology			Remove Appendix G	<p><b>ENMAX Power</b></p> <ul style="list-style-type: none"> <li>Support</li> </ul> <p><b>ENMAX Encompass:</b></p> <ul style="list-style-type: none"> <li>In favour</li> </ul>	

Section	Subsection	Existing	Proposed changes	Stakeholder comments	AUC response
				<p><b>EDTI:</b></p> <ul style="list-style-type: none"> <li>EDTI has no concerns with the proposed changes.</li> </ul> <p><b>EEAI:</b></p> <ul style="list-style-type: none"> <li>EEAI agrees with the proposed changes</li> </ul>	
Appendix H CSA Transaction Processing Methodology			Remove Appendix H	<p><b>ENMAX Power</b></p> <ul style="list-style-type: none"> <li>Support</li> </ul> <p><b>ENMAX Encompass:</b></p> <ul style="list-style-type: none"> <li>In favour</li> </ul> <p><b>EDTI:</b></p> <ul style="list-style-type: none"> <li>EDTI has no concerns with the proposed changes.</li> </ul> <p><b>EEAI:</b></p> <ul style="list-style-type: none"> <li>EEAI agrees with the proposed changes</li> </ul>	
Appendix I RSP's Approach to Identifying Sites Affected by an RRT Energy Rate Price Change			Remove Appendix I	<p><b>ENMAX Power</b></p> <ul style="list-style-type: none"> <li>Support</li> </ul> <p><b>EDTI:</b></p> <ul style="list-style-type: none"> <li>EDTI has no concerns with the proposed</li> </ul>	

Section	Subsection	Existing	Proposed changes	Stakeholder comments	AUC response
				changes.  <b>EEAI:</b> <ul style="list-style-type: none"> <li>• EEA I agrees with the proposed changes</li> </ul>	

**Additional questions (emailed to stakeholders on November 6, 2013, by Anne Glass) and responses:**

(1) A number of you reacted strongly against making the TSW transaction mandatory.

As a way of providing some history, below are two links. One is for a meeting summary held in July 2011 and the other is for a meeting held in October 2011.

[http://www.auc.ab.ca/rule-development/tariff-billing-code/Documents/Code\\_Revision\\_Working\\_Group/AUC%20Rule%20004%20TBC%20Consultation%20Meeting%20Summary%2020110706.pdf](http://www.auc.ab.ca/rule-development/tariff-billing-code/Documents/Code_Revision_Working_Group/AUC%20Rule%20004%20TBC%20Consultation%20Meeting%20Summary%2020110706.pdf)

[http://www.auc.ab.ca/rule-development/tariff-billing-code/Documents/Code\\_Revision\\_Working\\_Group/AUC%20Rule%20004%20TBC%20Consultation%20Meeting%20Summary%2020111005.pdf](http://www.auc.ab.ca/rule-development/tariff-billing-code/Documents/Code_Revision_Working_Group/AUC%20Rule%20004%20TBC%20Consultation%20Meeting%20Summary%2020111005.pdf)

Please review the discussion regarding RIM issue 480 in both of them. In that discussion, the group had agreed upon making this transaction mandatory but possibly only within the context of cancels and rebills that are not resolved by the next billing cycle. That is why the group chose to use the PFAM reason codes as the TSW reason codes. We are now considering changing it to a transaction that is only mandatory when a cancel and rebill cannot be performed by the next billing cycle and billing is, therefore, being held up for the site while it is being corrected. Distributors would have the option of using the TSW all of the time, but we would then need to expand the list of reasons. Please let me know what you think of that idea, and please provide some suggested reasons for the site withheld reason code.

	<b>Stakeholders' responses</b>
ENMAX Power	<ul style="list-style-type: none"> <li>EPC supports the use of the TSW as a means of notifying Retailers when a Crossed Meter Error Correction has been identified and not resolved by the next following scheduled tariff bill file publish date for that site (i.e. 2 bill cycles from point of error detection). Using the TSW for any other purpose remains at the discretion of the Distributor – i.e. is an optional transaction. EPC has highlighted the crossed meter as the specific scenario as no other error correction processes would ever take longer than 2 bill cycles to be completed in the TBF. However, EPC has no objections if other Distributors identify additional scenarios that might cause them to take more than 2 billing cycles to correct.</li> </ul>
EPCOR Energy Alberta Inc.	<ul style="list-style-type: none"> <li>When investigating sites on hold due to missing consumption, EEAI prefers to have the TSW transaction. This transaction, currently provided by EDTI, is very helpful in our investigations. EEAI's preference is to go with the AUC's original proposed change, which requires that the TSW be mandatory. However, EEAI understands that it may be costly to implement these changes for some distributors. EEAI suggests the following additional reason codes:               <ul style="list-style-type: none"> <li>Cross-meter Corrections (or investigation)</li> <li>Stop meter Corrections (or investigation)</li> </ul> </li> </ul>

	Stakeholders' responses
	<ul style="list-style-type: none"> <li>• Meter Check</li> <li>• Open dispute/investigation/dialog with site customer</li> </ul>
EPCOR Distribution Inc.	<ul style="list-style-type: none"> <li>• EDTI has no concerns with making the TSW transaction mandatory and therefore does not have any concerns with the idea proposed in question 1.</li> </ul>
ATCO Gas	<ul style="list-style-type: none"> <li>• If the decision is to proceed with a TSW on every TBF that is withheld, ATCO Gas would be looking to have reason codes such as "Retailer Switch or New Retailer" and "Cycle Change" added to the list of valid reason codes. In order to limit the number of TSW transactions being issued, ATCO Gas feels it may be preferable to only issue TSW transactions for cancel/rebill situations where new charges are not available by the next on-cycle tariff bill. Under this methodology the existing list of transaction reason codes should be sufficient.</li> </ul>
FortisAlberta	<ul style="list-style-type: none"> <li>• TSW: We support the move to require TSWs only in the situation where a cancel/rebill is underway and cannot be completed by the site's next scheduled bill date. We have visibility of these blocked sites and the intent is to create manual transactions for those few instances where a site is still blocked when it is scheduled to be billed. As there are so few times when this situation would be encountered, it is not prudent to design an automated system and so our intent would be to create manual transactions, once the transaction is defined. As this would require manual intervention, we propose a service level of two business days from the scheduled bill date to the creation and delivery of the TSW. We propose that the reason codes should closely mirror the existing cancel reason codes, i.e. investigating a potential site ownership correction, investigating a potential rate correction, investigating a potential meter read correction, investigating a potential crossed meter situation, investigating a potential multiplier correction, and an "other" for something we didn't anticipate.</li> </ul>

(2) Another item which stirred quite a bit of negative reaction was having to adjust past 3 years if it was the same customer. The rationale for this was those crossed meter (or similar) situations where a customer living at the same premises for many years knows about the crossed meter and how far back the situation has existed. Such a customer may be demanding a credit that goes back more than 3 years. What would you think of the approach of only being required to cancel and rebill back three years, unless the customer is demanding more through the retailer?

	Stakeholders' responses
ENMAX Power	<ul style="list-style-type: none"> <li>• We are reviewing the latest AUC proposal on adjustments with our Legal and Regulatory groups and will comment back to you once we have their advice.</li> </ul>
EPCOR Energy Alberta Inc.	<ul style="list-style-type: none"> <li>• EEAI disagrees with this new approach. As an RRO retailer, we are required to provide credits for the customers dating back to the time of the error. This means that customers should never be escalated or need to request for additional credits.</li> </ul>

	<b>Stakeholders' responses</b>
	<p>As a result, EEAI would still be crediting customers but not receiving the adjustment from the DSOs for periods greater than 3 years.</p>
<p>EPCOR Distribution Inc.</p>	<ul style="list-style-type: none"> <li>• EDTI has concerns with this approach as it would take a significant amount of time, cost and effort to cancel and rebill back only three years, unless the customer is demanding more through the retailer. These concerns are explained in detail below.</li> <li>• In December 2011, EDTI implemented an automated Post Final Adjustment Mechanism (PFAM) for financial adjustments of eight years, pursuant to AUC Rule 021, section 5.3.5 (3)(a)(ii). EDTI's tariff cancelling and rebilling function uses the same automated system as EDTI's PFAM function. Therefore, in order adopt the approach proposed in the question, EDTI would need to implement two disconnected automated functions: one to identify errors up to three years back and another to identify errors up to eight years back when a complaint is made. Also, additional manual processes would be required to initiate a cancel rebill back to eight years and to adjust the Retailer Adjustment Summary (RSA) transaction to the AESO and Retailer when a complaint is made. EDTI does not have the resources to complete these manual processes and would therefore require additional staff if this approach were adopted.</li> <li>• Implementation of the two disconnected automated functions and manual processes discussed above would require significant time, effort and cost. EDTI is uncertain whether the benefits of the proposed approach would offset these additional costs. Also, EDTI and its Retailers have not had any issues with their current approach. EDTI therefore proposes to continue with its existing process.</li> <li>• As an aside, EDTI has a 24-month cancel and rebill billing tariff bill file display. That is, EDTI shows the cancel and rebill for each billing period for 24 months. Any credit beyond two years or net debit between the 11th and 24th month is identified in the One Time Credit (OTC) section of the tariff bill file in the 24th month. It is unclear whether the AUC is contemplating an eight-year or 96-month cancel and rebill billing tariff bill file display or if the AUC is proposing to change the OTC to the 36-month standard. EDTI notes that it would incur additional costs if it were required to change the way its cancel and rebill billing tariff bill file is displayed.</li> </ul>
<p>ATCO Gas</p>	<ul style="list-style-type: none"> <li>• ATCO Gas does not agree with attempting to do credit/debits for any measurement error based on "customer." Customer requires retailers to provide UCIs that are always accurate and are always provided at the time the customer changes. UCIs are not accurate to the actual date the retailer is holding a customer responsible due to retailer enrollment errors as well as the default supply provider needing to hold on to sites but unable to send updated customer information because of the winter moratorium. ATCO Gas supports billing retailers for specific periods of time – not needing to review "customer."</li> <li>• ATCO Gas does not agree with unequal credit/debits for crossed meters. Crossed meters are not a measurement error; the meter readings from the meters are known and the meters are measuring accurately. Given that crossed meters are not caused by the distributor, and there is no possibility of the distributor knowing they exist until found years later by accident, there is no rationale for not billing retailers equal credits/debits. ATCO Gas does not agree with "customer" for any crossed meter evaluation. Customers do not match up to dates the meters were installed. What period of time is the distributor expected to look at to determine which customer used less natural gas when there are unequal UCI dates?</li> </ul>

	<b>Stakeholders' responses</b>
	<ul style="list-style-type: none"> <li>• ATCO Gas does not agree with being required to perform credits twice. These are manual processes to cancel/rebill. To credit the first time, then be asked to do it again, is costly and ineffective, particularly since archived materials must be pulled from storage after 3 years.</li> <li>• For additional details on this, please also refer to Carol Benoit's e-mail from Nov 6<sup>th</sup>. (see below)</li> </ul> <p>A few quick questions about #2 below... it seems our ability to respond is based on if "customer wants more credit" than 3 years. Is this the only possible change being considered? I know this has been discussed at several AUC meetings on this topic and I have raised but....</p> <ul style="list-style-type: none"> <li>• A measurement error is within the distributor's control – wrong meter reading recorded, wrong pressure input into the system, no meter reading recorded, equipment failing and delay in follow up.</li> <li>• A meter installation on pipe labeled by a builder's plumber (and found out years later to be wrong because when we shut off a customer for non-payment at the correct service address we find out that the meter actually serves the unit next door) or a change of piping on the customer's side of the meter to provide service to equipment in another bay without letting the distributor know....these are not in the control of the distributor -- this is not a measurement error. The correct meter readings were recorded and the total usage is known for both meters.</li> </ul> <p>Given the expense involved in manually handling cancel/rebills due to mixed meters, why would the distributor not be allowed to credit/debit the same period of time without regard for site customer, given that mixed meters happened for exactly the same time period for the sites and retailers are the customers of distributors? This is asked in context of:</p> <p><b>Mixed meters are not a billing error caused by the distributor</b></p> <p>It appears that the AUC may still consider mixed meters to be a distributor error when mixed meters historically arise from two situations and relate generally to residential or condo commercial bays due to:</p> <ol style="list-style-type: none"> <li>1) The meter is not installed unless the homebuilder labels the internal house piping – but it is later (often years) before it is known that the piping was not labelled correctly. The homebuilders contractor lights up appliances so the distributor does not have opportunity to identify given our delivery rates do not cover the costs of initial light up on new services.</li> <li>2) Piping inside the building changes over time as customers come and go...and the building owner makes changes in piping to tie into existing meters unknown to a distributor. Customers have responsibility for changes to facilities and piping on the customer's side of the meter.</li> </ol> <p><b>Regarding a site customer qualifier for X number of years</b></p> <p>There is a concern about the quality of UCIs which has been raised at AUC meetings naming site customers (and distributors would only be able to use UCIs):</p> <ul style="list-style-type: none"> <li>• mixed retailer enrollment</li> </ul>

	<b>Stakeholders' responses</b>
	<ul style="list-style-type: none"> <li>• failure of customers to apply for gas service (leaving the default supplier with UNKNOWN CUSTOMER for months)</li> <li>• retailers changing and one retailer named the wife while the next one names the husband – the distributor would have no idea “same customer”</li> <li>• not all retailers providing all names to distributors of who they hold financially responsible.</li> </ul> <p><b>Suggestion of #2 below</b></p> <p>It appears the only variation in the blackline might be the suggestion #2 below meaning that the distributor most likely now has to perform manual credit cancel/recharges twice:</p> <ol style="list-style-type: none"> <li>1) The first time according to rules based on site customer (which is faulty decision criteria for reasons above related to UCI).</li> <li>2) Second time because now the customer told the retailer he/she would like more credit.</li> </ol> <p>On what basis of “current site customer” is the distributor to do the mixed meter credit/debit evaluation and then later, give some more? Which “current customer”? What if (and this is not unusual):</p> <ul style="list-style-type: none"> <li>• the current customer on site A has been there 5 years and current customer on site B has been there 10 months.</li> <li>• Current customer on B was billed for less than the customer on A - so would get the 10 month credit. Site A customer would get 12 months of debit...as per blackline.</li> <li>• But, if total billed back to 5 years ago, and in all that time, site A used 50 GJ less in 5 years than the accumulated billing for customers on site B – is the site A customer supposed to get the credit?</li> </ul> <p><b>Distributor is fixing the situation that was not known to have occurred</b></p> <p>Metering errors – where meter readings are not recorded or equipment is not operating, or investigation of possible equipment problems – these are within the distributor’s control.</p> <p>A meter installed at a location as a builder requested and/or where internal piping has been changed is not within the distributors ability to control. Mixed meters generally do not happen due to distributors actions and can only be corrected when found. The distributor devotes time to these situations to correct and does not charge customers for services related to getting service back on or investigation at the site to do service line tracing (to find out which appliances the homeowner/property manager has tied into which meters).</p> <p>However, because retailers and customers change, errors happen, current site customers do not line up on same dates on sites and UCIs are not treated equally by all retailers as the mixed meter date does, trying to do anything based on current site customer is going to be very difficult to manage for distributors with a large number of residential sites in their customer base. Because usage is known and the distributor is just correcting the issue know that is known, perhaps the distributor and retailers involved could be left whole with equal cancel/rebill timeframes for mixed meters based on a period of</p>

	Stakeholders' responses
	<p>time, not site customer or retailer?</p> <p>Is there opportunity to consider other options to equalize credit/debit for mixed meters, given the above, and/or for the AUC to consider billed usage for the site in a period of time, not current site customer?</p>
FortisAlberta	<ul style="list-style-type: none"> <li>• <u>Cancelling back up to 3 years unless a customer complains to their retailer:</u> We are not supportive of setting out different rules based on whether the customer complains. From a customer service perspective, we hold that all customers should be treated equally, whether or not they complain. From a practical perspective, we aren't clear on how we could design a system to accommodate this dichotomy. While we understand that customers will seek a full credit back to the time of an error, we do not believe customers or retailers would be impressed with the discovery that any under-charge can be charged back three or more years. As noted earlier, back-billing beyond one year violates our current Terms and Conditions and Section 17 of the Regulated Rate Option regulation.</li> <li>• FortisAlberta has used SAP IS-U since August 2003. All our metering and billing information and calculations are done in IS-U and the full ten years and counting is active; currently nothing is archived. There is a cause and effect relationship between metering and billing and, in our case, both metering information and billing information are housed in IS-U. If we needed to limit bill correction to a 3 year timeframe, we would need to develop some way of separating the cause and effect relationship between metering and billing after that 3 year milestone. As the SSC requires PFAM correction back as far as 8 years, we would need to cancel back the meter information potentially up to 8 years, but not cancel and replace the billing information beyond three. This, in itself, will be very complex, with an IT ballpark estimate of \$750K to \$1M. To add in the additional request that we have the optional ability to adjust that freeze period beyond three years in certain situations will add more complexity and cost to the effort.</li> <li>• Please note that this estimate does not include the effort that would be required for the other proposed changes, including a mandatory universal price split, mandatory cancel and replacement in the same file, and the development of the TSW. The all-in ballpark cost estimate would be in the \$1.5M-\$2M range and the project would require most of 2014 to allow for a 2015 implementation.</li> </ul>

(3) This is a question for the retailers. Some of the distributors have asked whether they can do a cancel and rebill that goes back more than three years and is then adjusted back to three years with a reversal one-time charge. In trying to decide the answer to this question, we need to know how this impacts retailers that only have three years of data online (not archived). Are you able to process a cancel and rebill in TBF format if it contains more records than your system has available online?

	Stakeholder response
EPCOR Energy Alberta Inc.	<ul style="list-style-type: none"> <li>• Our system will accept and process TBF cancel/rebills as far back as there is data (TBF initial) available. If the data is purged, then the TBF records are loaded and are manually worked by our Billing Group. EEAI has no issues processing a cancel/rebill in TBF if it contains more records than our system has available.</li> </ul>