

AUC Rule 021 and Rule 028 Industry Consultation Meeting Summary

Meeting date	October 1, 2014	Time	9 a.m. to 2 p.m.
Location	<u>Video conference AUC offices</u> Tenth Floor, 10055 - 106 Street Edmonton Fourth Floor, 425 First St. S.W. Calgary <u>Teleconference</u> Phone: 1-866-792-1318 Conference code: 8665992	Facilitator	AUC staff

1 Introductions

Name	Company
Flora van Wageningen	AESO
Mike Choboter	AESO
Heather Hart	AltaGas Utilities Inc.
Linda Kinnee	AltaGas Utilities Inc.
Steve Lai	AltaGas Utilities Inc.
Enrique Nino	ATCO Electric Ltd.
Jessica Laird	ATCO Electric Ltd.
Juanito De Jesus	ATCO Electric Ltd.
Mary Lou Pura	ATCO Electric Ltd.
Carol Benoit	ATCO Gas
Anne Glass	AUC
Rose Ferrer	AUC
Paula Robertson	City of Red Deer
Lori Harnack	Cognera Corp.
Natasia Wasson	Cognera Corp.
Chukwudi Anwu	Direct Energy
Karen Cooke	Direct Energy
John Hutchison	ENMAX Commercial Services Inc.
Carla Pitura	ENMAX Encompass
Paul Lindsay	ENMAX Power
Hala Elsaadi	EPCOR Distribution & Transmission Inc.
Jeff McNeill	EPCOR Distribution & Transmission Inc.
Joel Milne-Epp	EPCOR Energy Alberta Inc.
Shirley Kwan	EPCOR Energy Alberta Inc.
Ralph Steendam	EQUUS REA Ltd.
Brian Neufeld	FortisAlberta Inc.

Name	Company
Tina Dulguerov	FortisAlberta Inc.
Lori Schultz	MIDAS Metering Services Ltd.
Susan Enskat	Office the Utilities Consumer Advocate (UCA)
Joanne Mulders	Utility Network & Partners Inc.

2 Post-implementation discussion

- The group did not identify any post-implementation issues from the June implementation.

3 RIM issue 473 – Rules 021 and 028 – Deemed time

- AUC staff reminded the group that the Deemed Time, Site and Metering Processing Standards Working Group was no longer meeting but two outstanding items remained. One outstanding item is a spreadsheet giving examples of each distributor’s methodology for deeming time. The other is that the group needs to decide when and how it would be best for FortisAlberta to adjust its methodology for deeming time so as to have the least negative impact on the market.
- The spreadsheet had been sent to the various distribution companies for completion in June. Some of the distributors had already provided examples in the spreadsheet. AUC staff committed to re-circulating the spreadsheet to the group for completion. AUC staff indicated that once it receives each company’s information, it would do the consolidating and would post that information on its website.

ACTION: AUC staff to re-circulate deemed time spreadsheet to the group for completion.

ACTION: Distribution companies to either provide examples of their methodology for deeming time in the spreadsheet or validate information already provided and return the spreadsheet to the AUC.

ACTION: AUC staff to consolidate information into one spreadsheet and post on AUC’s website.

- FortisAlberta had previously provided a detailed explanation on RIM issue 473 of the misalignment of the WSD and tariff bill file consumption and the expected impact if changes were to be implemented to align the consumption. A separate document containing examples and illustrations was provided to AUC staff for circulation. Some parties indicated that they had not received the document. AUC staff committed to re-circulating the document for discussion at the next meeting.

ACTION: AUC staff to re-circulate attachment explaining FortisAlberta’s misalignment of the WSD and tariff bill file consumption and the expected impact if changes were to be implemented to align the consumption.

4 RIM issue 517 – Rule 028 – PFAM process for gas

- AUC staff explained that retailers involved in the PFAM Process for Gas Working Group had been working to reach agreement on what they would require from a PFAM process for gas. Cognera explained that Cognera, Direct Energy and ENMAX Energy had made notable progress on reaching agreement and that, once agreement among the retailers is reached, the next step would be for AUC staff to schedule a meeting between the retailers and distributors. Since Encore by EPCOR is now involved in marketing gas, it expressed interest in being involved in discussion with the retailers. ENMAX Encompass also expressed similar interest.

Cognera committed to providing Encore by EPCOR and ENMAX Encompass with an update on past discussions. Once all retailers reach agreement (Cognera, Direct Energy, ENMAX Energy, Encore by EPCOR and ENMAX Encompass), AUC staff to schedule a meeting involving retailers and distributors.

ACTION: Cognera to provide Encore by EPCOR and ENMAX Encompass with an update on past discussions.

ACTION: Retailers to reach agreement on what they would require from a PFAM process for gas and notify AUC staff once agreement has been reached.

ACTION: AUC staff to schedule a meeting involving retailers and distributors (once retailers reach agreement).

5 RIM issue 525 – Rule 021 – Future site lock transaction

- AUC staff raised RIM issue 525 to open discussion regarding whether or not Rule 021 should have provisions regarding site locks similar to those in Rule 028. AUC staff explained to the group that currently site locks are optional but, when used, have a mandatory transaction that the retailer must send when payment is received. Because of the mandatory nature, AUC staff questioned the group as to whether it should be included in Rule 021.
- AUC staff provided a refresher on the site lock process:
 - A retailer issues a request to disconnect a site for nonpayment.
 - A distributor that uses the site lock process (i.e. ATCO Electric or ATCO Gas) performs the disconnect and marks the site as being locked.
 - A new retailer enrolls the site.
 - The distributor sends the retailer an EMC transaction (non-standard transaction) to inform the retailer that there is a lock on the site.
 - If the new retailer issues an energize request in order to get the site reconnected, the distributor sends an energize failure.
 - In order to get reconnected, the customer must pay the retailer that issued the disconnect request (former retailer) and, upon receiving payment, the former retailer must send the release lock transaction (RCL) to the distributor.
 - The distributor sends a new EMC transaction to the new retailer to inform that retailer that the lock has been lifted.
 - The new retailer issues a new energize request, and the site is reconnected by the distributor.
- The group expressed concerns over building optional transactions into Rule 021. AUC staff's response was that the site lock process was optional but, when the site lock process is followed, the RCL transaction becomes mandatory.
- AUC staff were concerned that there could potentially be instances where retailers do not build processes for issuing RCL transactions because they are not defined or explained in Rule 021 and therefore customers could have difficulty getting re-energized even though they have paid their bills.
- AUC staff referenced page 51 of Rule 028 to serve as an example of the type of language currently used to address optional site lock transactions in Rule 028.

- All parties agreed to review the language contained on page 51 of Rule 028 for discussion at next meeting.

ACTION: All parties to review language contained on page 51 of Rule 028 prior to next meeting for discussion regarding whether similar language should be added to Rule 021.

6 RIM issue 527 – Rule 021 – Enrolment of transmission-connected sites

- AUC staff reminded the group of the history surrounding the discussion of restricting enrolment of transmission-connected sites to the first of the month. Originally, the proposal to restrict enrolments of transmission-connected sites to the first day of the month was put forward to this group in 2012 to address billing challenges that occur when transmission-connected sites are enrolled mid-month. However, restricting enrolments of transmission-connected sites creates other problems, such as how to address erroneous enrolments.
- Previously, parties had expressed concern that if enrolment is not restricted and if the site is enrolled erroneously, the retailer should not be stuck with the site for the entire month. Also, in a given year there are very few transmission-connected sites that switch retailers, so some parties were concerned about the amount of time, effort and resources that would be required to restrict enrolments.
- In 2012, this group had decided against restricting enrolment of transmission-connected sites, concluding other alternatives should be explored to address the billing problem. It was determined at that time that this would be done as part of the AUC Rule 004 Tariff Billing Code Working Group, with the goal of including the billing solution in the upcoming revisions to Rule 004.
- There was an action item from the March 5, 2014, AUC Rule 004 Tariff Billing Code Working Group meeting for the AUC Rule 021 and Rule 028 Industry Consultation group to revisit its previous decision to not restrict enrolments for transmission-connected sites to the first of the month.
- AUC staff raised this RIM issue asking whether it would be useful to add wording to Rule 021 allowing for transmission-connected sites to be enrolled on the first of the month only, while leaving other enrolment rules unaffected.
- AUC staff proposed three possible scenarios for the group to consider: (1) restrict enrolments to the first of the month, (2) encourage first of the month enrolments, or (3) allow for enrolments to occur at any point in the month and have the last retailer receive transmission charges.
- All parties present agreed to strive for first of the month enrolments but realized that there would be situations that necessitated mid-month enrolments. Consequently, distributors agreed to leave it to retailers to manage those exceptional situations.
- All parties present agreed that changes to Rule 021 are not required at this time.
- AUC staff asked the group to confirm that this issue could now be closed. The group agreed.

ACTION: AUC staff to close RIM issue 527.

7 RIM issue 528 – Rules 021 and 028 - Confirmation of DSO processes on backdated SMCs

- In the process of implementing recent Rule 021 changes, EPCOR Energy was encountering problems with how some distributors were backdating SMCs after correction. The two issues identified by EPCOR Energy were that they require the backdated SMCs to be in chronological order by effective date; otherwise, not receiving SMCs in sequential order could cause

problems with how the information is loaded into its systems. Other than AltaGas Utilities, all distributors present indicated that they send their SMCs for the same site in sequential order by effective date. AltaGas Utilities would need to check to confirm.

ACTION: AltaGas Utilities to confirm whether it sends its SMCs for the same site in sequential order by effective date.

- The other issue is how FortisAlberta implemented the changes. FortisAlberta interpreted the phrase in the rule, “No more than one SMC per site per effective date shall be sent each day” to mean “No more than one SMC per site shall be sent each day.” Consequently, should multiple SMCs be required to correct past SMCs, FortisAlberta will send one a day. EPCOR Energy explained that FortisAlberta’s approach creates challenges in determining the current state of a site.
- AUC staff questioned FortisAlberta whether it would be a major change to their system to send all of the SMCs in the same file. FortisAlberta indicated that it would be a major change. The group questioned EPCOR Energy whether FortisAlberta’s approach is causing them enough problems to warrant the expense of making a major system change. EPCOR Energy indicated that it would follow up to determine the severity of impacts it is experiencing from this issue.

ACTION: EPCOR Energy to follow up to determine the severity of impacts it is experiencing as a result of FortisAlberta’s implementation approach to providing SMCs after a backdated correction of sending one per site per day.

- AUC staff asked the other retailers if they were experiencing problems because of FortisAlberta’s implementation approach. The retailers present were uncertain and would investigate.

ACTION: Retailers to follow up to determine whether or not FortisAlberta’s implementation approach to providing SMCs after a backdated correction of sending one per site per day is causing customer impacts.

8 RIM issue 530 – Rules 021 and 028 – Erroneous enrolment process

- ATCO Gas explained to the group that it had raised this issue because it had been receiving pushback from retailers when being asked to investigate potential erroneous enrolment situations as per Section 7.3(7)(b) of Rule 028 [Section 7.4(6)(b) of Rule 021] or to re-enrol a site as per Section 7.3(7)(e) of Rule 028 [Section 7.4(6)(e) of Rule 021]. ATCO Gas explained that at least two retailers will not take direction from it because they consider it to be a third-party request and therefore against privacy regulations.
- One retailer raised the point that if the other retailer is not doing as directed and re-enrolling a site, the retailer that erroneously enrolled it should be issuing a de-select at the same time. That way it would not have the site for more than five days. In RIM issue 530, ATCO Gas had proposed making the DSR mandatory and making it the vehicle for communicating to the LSA. The group debated this approach as being unsatisfactory because then the site goes to the RRO or default supplier rather than to the retailer that has a contract with the customer at the site.
- AUC staff pointed out to the group that if specific retailers are not enrolling as required by the rule, parties could raise a complaint to the AUC. However, one retailer pointed out that there are some situations where a retailer cannot re-enrol a site, such as where a contract has since expired or when the previous retailer had also erroneously enrolled the site.
- The group discussed whether or not a request to investigate could or should be considered against privacy regulations. Also, one distributor pointed out that it can often identify what is

actually going on in an erroneous enrolment situation but there is question of what the distributor can actually say to people. AUC staff asked whether the language of the *Privacy Act* would restrict investigations or discussions of this nature since there is a lot of leeway in the act when someone is trying to collect money, which this potentially relates to. One retailer would not re-enrol a site without confirming with the customer that he or she wants to be re-enrolled. If the customer does not return its calls, the retailer will not re-enrol.

- The group also discussed that sometimes when retailers re-enrol sites because they have a contract with the customer at the site, the other retailer just takes it back and the site can go back and forth numerous times without resolution. One party suggested that possibly the UCA could be the one to intervene in these situations; however the UCA is only able to see the information for the customer they are talking to and not the other side of the erroneous enrolment.
- One party suggested that it would make sense for the distributor to identify, to the retailers involved, the names and contact information of the other retailers involved so as to allow the two or more retailers to discuss the site and identify which one truly has the right to the site. The group questioned whether this information would be allowed under the *Privacy Act*. As the *Privacy Act* was intended to protect customers and not companies, the group concluded that the sharing of retailer information would be allowed under the *Privacy Act* as long as no customer information was shared.

ACTION: AUC staff to draft language for inclusion in the erroneous enrolment section of the rules that stipulates that distributors provide the names and contact information of the retailers involved to the other retailers so as to facilitate the investigation required by the rule.

- Among the retailers present, there was some uncertainty as to their current practices when distributors are notifying them of a potential erroneous enrolment or of the need to re-enrol a site as required by the rule. AUC staff suggested that a better understanding of the current practices and the barriers to following the practices as outlined in the rule is needed. All retailers were asked to investigate within their organizations what the current practices are when they have erroneously enrolled a site and also when another retailer has erroneously enrolled a site and they are contacted by the LSA.

ACTION: Retailers to investigate what their current processes are for each of the following three scenarios: (1) as competitive retailer you are notified by the distributor that another retailer has erroneously enrolled one of your sites; (2) as RRO provider you are notified by the distributor that another retailer has erroneously enrolled one of your sites; and (3) as either a competitive retailer or an RRO provider, the distributor asks you to investigate whether or not your enrolment is possibly in error.

9 RIM issue 531 – Rules 021 and 028 - SID - Cluster Correlation Key field

- ENMAX Power suggested to the group changing the data type/size of the Cluster Correlation Key field in the SID from Number(6) to Number(13) and of changing the data type/size of the Area Name field from Varchar(20) to Varchar(30). No parties expressed any concerns with this, and everyone agreed to check whether this would pose any problems.

ACTION: All parties to follow up on potential impacts of changing the data type/size of the Cluster Correlation Key field in the SID from Number(6) to Number(13) and of changing the data type/size of the Area Name field from Varchar(20) to Varchar(30).

10 RIM issue 532 – Rules 021 and 028 – USA - Cluster Correlation Key field

- ENMAX Power suggested to the group changing the data type/size of the Cluster Correlation Key field in the USA from Number(6) to Number(13) and of changing the data type/size of the Area Name field from Varchar(20) to Varchar(30). No parties expressed any concerns with this, and everyone agreed to check whether this would pose any problems.

ACTION: All parties to follow up on potential impacts of changing the data type/size of the Cluster Correlation Key field in the USA from Number(6) to Number(13) and of changing the data type/size of the Area Name field from Varchar(20) to Varchar(30).

11 Critical to have power

- AUC staff reminded the group that there are two types of critical-to-have-power statuses: (1) a “critical-to-have-power customer” which is a residential customer with medical needs and those needs move if the customer moves from the site (the expectation is that the retailer will manage the list of critical-to-have-power customers including obtaining medical documentation and will communicate the list to the distributor through the critical-to-have-power flag in the UCI); and (2) a “critical-to-have-power site” where the critical-to-have-power status is related to the site (the distributor should manage this information separately from the residential critical-to-have-power customers). During the discussions related to the critical-to-have-power flag in 2013, the AUC had confirmed that the flag was for residential customers only and that the retailer would populate the field accordingly. The distributor would maintain the list of critical-to-have-power sites separately.
- AUC staff asked the various distributors whether they had separate databases for critical-to-have-power customers versus critical-to-have-power sites. ENMAX Power, FortisAlberta and EPCOR Distribution & Transmission all indicated that critical-to-have-power customers are managed separately from critical-to-have-power sites in their systems. ATCO Electric indicated that, at this point in time, it cannot differentiate between critical-to-have-power customers versus critical-to-have-power sites but that it would be able to likely by the end of 2015. Critical-to-have-power customers will be managed through its billing system, and critical-to-have-power sites will be managed through its GIS.
- AUC staff asked the distributors what their processes are relative to critical-to-have-power customers. For example, in the case of an outage, would critical-to-have-power customers be turned on any quicker than non-critical-to-have-power customers.
- EPCOR Distribution & Transmission indicated that it has plans in place to be able to treat customers differently between critical and non-critical. In the future, it will be able to notify critical-to-have-power customers of planned outages and, for unplanned outages, will be able to identify critical-to-have-power customers within an outage zone for quicker re-energization. ATCO Electric expressed similar plans.
- FortisAlberta and ENMAX Power were uncertain and committed to investigating what their processes currently are and any plans relative to critical-to-have-power customers.

ACTION: FortisAlberta and ENMAX Power to investigate what their processes currently are and any plans relative to critical-to-have-power customers for discussion at the next meeting.

- Cogenera indicated that distributor lists are not consistent with what retailers have provided them. After the January rule change, retailers were required to perform extensive cleanup of their data relating to critical-to-have-power customers. Now they expressed concern because data they were getting back from distributors had all kinds of sites marked as critical-to-have-

power that the retailers had not marked in that way. AUC staff questioned Cognera whether these were for critical-to-have-power customers or sites. Cognera indicated that the lists did not differentiate between them. AUC staff was uncertain of the value of a reconciliation process until distributor systems are all ready for managing the two lists separately.

- Cognera questioned whether, for sites that are not residential, should the retailer still provide UCI's saying that it is a critical-to-have-power customer. For example, should a hospice be marked as a critical-to-have-power customer. AUC staff responded that the distributor should be managing any sites that are not residential. So if the hospice is not classified as residential, no, the retailer would not be required to mark a hospice as critical-to-have-power.
- One retailer suggested that Rule 021 should state that the flag should be used for human medical reasons for either residential or farm customers. The group agreed.

ACTION: AUC staff to change Rule 021 to state that the flag should be reserved for residential or farm sites for human or medical reasons.

- One party questioned whether they needed to be sending new UCIs for all their sites as part of their cleanup or if they should only be sending new UCIs when they had previously flagged a customer as critical-to-have-power and were now changing that flag. AUC staff responded that they are only required to send a new UCI when they are changing the critical-to-have-power status from a previous UCI that was sent.

12 De-select reason codes

- The UCA wanted to remind the group of the consequences to customers of choosing the wrong de-select reason code when dropping a customer, so that parties can remind staff of the importance of choosing the correct de-select reason code.
- The UCA described that when a retailer is truly dropping a customer but incorrectly chooses "move" as the reason, the default supplier or regulated rate provider makes the assumption that the customer information is no longer valid and awaits a call from the customer to setup service. When no such call comes from the customer because it is not required in a drop situation, the customer usually gets disconnected. Therefore, the customer impacts are great.

ACTION: Retailers to remind staff of the impact of choosing the correct de-select reason code.

- The AESO suggested that, as part of its compliance monitoring function, if the UCA or some other party suspected that the wrong code was used in a particular situation, the AESO would be able to investigate the transactions and confirm whether or not any rules were broken. Since there is no party similar to the AESO on the gas side, the group concluded that the AUC would need to be the ones to investigate suspected use of a wrong code for the gas side.

13 Load settlement agent yearly audits

- The AESO provided its plans to the group regarding the yearly load settlement audits required under Section 2.13 and Section 6.5.3 of Rule 021. Currently, the AESO is determining what areas the LSAs should be focusing on, and it will be sending out letters to the LSAs that have not performed their audits as of yet in the next couple of weeks. The letters will identify the areas of focus, but the AESO is hoping to get feedback from the LSAs regarding what should be audited regularly. In future versions of the code, the AESO is planning to include specific areas that require regular audits. Also, frequency of audits should be discussed by the group, with the rule potentially identifying what processes should be audited in what years, should it be changed to a multi-year process.

ACTION: Parties should come prepared to discuss audit requirements at the next meeting.

14 Adding new loss code ENERKEM for EPCOR Distribution & Transmission

- EPCOR Distribution & Transmission requires a new loss class code to be added to the loss class reference table (Table A-17) of Rule 021. The new code is called ENERKEM.

ACTION: AUC to add a new loss code to the loss class reference table (Table A-17) of Rule 021.

15 RIM issues to be closed:

- AUC staff proposed to the group closing the following two RIM issues.
 - RIM issue 521 – Rule 028 – Profile class inconsistency within the SRN and WSD transactions
 - RIM issue 526 – Rule 021 – Sending ENR/DER Responses Hourly
- The group had no objections to closing RIM issue 521 because retailers have found ways to work around AltaGas Utilities' being unable to provide the correct profile class in the SRN and providing the profile classes in an email instead. Cognera did ask, however, that AltaGas Utilities add the date to the name of the file being emailed so that it is easier to distinguish one file from another. AltaGas Utilities committed to doing so.

ACTION: AltaGas Utilities to add the date to the file name when emailing sites' profile classes so that it is easier to distinguish one file from another.

ACTION: AUC staff to close RIM issue 521.

- In addition to the work around, AUC staff suggested that AltaGas Utilities apply for an exemption until such a day as they are able to fully comply with Section 8.6.3.2 of Rule 028.
- Regarding RIM issue 526, the AUC recently added wording to Section 9.6.7 of Rule 021 which states: "(a) An exception to the performance standard stated in Section 9.6.7(3) above shall be permitted for scheduled maintenance or for other reasons that are specifically approved by the AUC, not to exceed two non-consecutive calendar days per calendar month." However, ATCO Electric identified that it is unable to be in compliance even with this exemption because it has regularly scheduled system backups on Saturday evenings between 5 and 7 p.m. So during this time, ATCO Electric cannot meet the hourly requirement. The group was all in agreement that it would not be a problem to change the wording to say: "...not to exceed five non-consecutive calendar days per calendar month."

ACTION: AUC to change Section 9.6.7(3)(a) to read: "An exception to the performance standard stated in Section 9.6.7(3) above shall be permitted for scheduled maintenance or for other reasons that are specifically approved by the AUC, not to exceed five non-consecutive calendar days per calendar month."

ACTION: AUC staff to close RIM issue 526.

16 Other issues

- ATCO Electric posed the question to the group whether or not the rule should identify what transactions could be omitted if a distributor was experiencing a disaster. For example, would daily settlement transactions be a necessity? The group agreed that providing daily settlement transactions after the fact would not provide value to the marketplace if monthly settlement

transactions were already being provided; if monthly settlement was not imminent, there would still be value in providing daily settlement transactions.

- The group discussed the value of, on a per transaction basis, identifying what would be required and what would not be during a disaster and concluded that the most important thing for any party to do during a disaster is to communicate with the other parties and jointly develop a plan of action, similar to what took place during the 2013 flood. In addition, the group decided that each disaster is different, and it would be near impossible to document each scenario in the rule and identify the correct course of action for each type of disaster or each possible disaster duration. Therefore, the group concluded that changes to the rule are not required at this point but that there be an expectation that, during a disaster, communication be frequent amongst all the parties involved. Also, during the 2013 flood, many parties were technically non-compliant with the rules and the AESO did not take action. Both the AUC and AESO were focused on finding solutions to the many problems that were being encountered at that time.