

2 Review summary table of proposed changes to Rule 004 – September 16, 2014

Section 2.12 – Link tariff billing to distributor invoicing

- AUC staff is proposing the addition of the following new subsection:

Section 2.12(3)

(3) 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), and must be electronically searchable using optical character recognition (OCR) technology. 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.

- There were no objections to the proposed changes.

Section 2.14 Monitor performance, Table 2-2

- Previous proposed changes had not identified that the following paragraph was to be removed:

~~(2) 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, Alberta Tariff Billing Code, 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 www.auc.ab.ca~~

- There were no objections to the removal of this subsection.

Table 2-1 Performance requirements, table reference ID 1

- Previous proposed changes had inserted the tariff bill file publication timing for transmission-connected sites as table reference ID 2, which had caused all subsequent table reference IDs to be renumbered. Upon reconsideration AUC staff is proposing to make the current table reference ID 1 as ID 1a and the proposed new tariff bill file publication timing for transmission-connected sites as table reference ID 1b.

- There were no objections to the proposed renumbering.
- For the new table reference ID 1b, AUC staff is proposing to change the wording for the measure and the target as follows:

Measure: For transmission-connected sites: time limit to transmit a transmission-connected site's charges.

Target: Maximum: last calendar day of the month following the charge period.

- There were no objections to the proposed changes.

Table 2-1 Performance requirements, table reference ID 8

- AUC staff reminded the group of the discussions that took place throughout 2011 and proposed having a new performance requirement for cancels and rebills not triggered by TBDs that would be consistent with the performance

requirement for those triggered by TBDs. AUC staff was proposing that table reference ID 8 be changed to ID 8a and that the new wording of that measure reads as follows: number of ~~business~~ days following receipt of a TBD transaction to resolve the dispute by transmitting a cancel and/or~~er~~ rebill, provided that the TBD transaction was accepted. (Note: in exceptional circumstances, the rebill may be based on a new estimate.) For ID 8b the proposed wording was: number of days following confirmation of the existence of an error requiring correction via cancel and rebill to the transmittal of a cancel and rebill in a tariff bill file. (Note: in exceptional circumstances, the rebill may be based on a new estimate.) For both of the performance requirements, AUC staff was proposing a mean of 35 calendar days for 95 per cent and a maximum of 70 calendar days for 100 per cent.

- The group challenged the idea of having the same targets for table reference IDs 8a and 8b. The group decided that for table reference ID 8a, a mean of five business days for 95 per cent of disputes (as the rule currently states) should remain the target. However, the maximum, as it is worded in the current rule, “by next scheduled bill file publish date for the site,” does not work as a maximum because there is potential for the next scheduled bill file publish date to be only a few days away after the receipt of a TBD. The group decided that the maximum should be changed to 35 calendar days for 100 per cent of disputes.

ACTION: AUC staff to change table reference ID 8a to have a maximum target of 35 calendar days.

- The group debated whether the wording of table reference ID 8a as proposed should be “cancel and rebill” or “cancel and/or rebill” as it currently states. While the group recognized that AUC staff had removed the “or” to reflect that cancels and rebills would now have to go together, one distributor did point out that when the wrong retailer is originally billed, a cancel will be sent without a rebill. The group decided to keep the “or” but add a reference to the section that stipulates that cancels and rebills must go together except in situations where there will be no rebill (e.g. when the wrong retailer was billed for the site in the first place).

ACTION: AUC staff to keep the “or” in the description for table reference ID 8a and add a reference to Section 5.4.1(2) which is where the rule will state that cancels and rebills must go together unless there will be no rebill.

- For table reference ID 8b, distributors voiced that in some situations it would not be possible to correct errors within the proposed maximum of 70 days. One distributor used as an example a situation it had encountered where an entire apartment complex (through no fault of the distributor) had mixed meters going back many years. The group did not necessarily see value in providing estimates to meet the 70 day target if billing was not interrupted while the error was being corrected. ATCO Gas indicated that it will change its practices relating to non-registering meters by putting an estimated read for meters being investigated so that billing can continue without interruption during the period of investigation and correction.
- Some retailers proposed setting a maximum for how long a site can go without billing. Some distributors challenged this idea because they indicated

that this was not a big enough issue to warrant inclusion in the rule. Cognera indicated that the maximum should be included in the rule because it has escalated situations to distributors of sites not billing and encountered responses from them that they are within threshold, meaning that they are meeting the requirement of 98 per cent of sites bill on time. Distributors were interested in specific examples, and Cognera volunteered to bring forward to the group any new examples of distributors responding that they are within threshold.

ACTION: Cognera and retailers to bring forward to the group any new examples of distributors responding that they are within threshold.

- The group concluded that it is more important to immediately focus on creating a performance requirement that stipulates how long a site can go without billing and leave the determination of a performance requirement regarding error correction until distributors have the opportunity to monitor how long it currently takes them to perform some of the more time-consuming corrections. Therefore, the group decided against the addition of table reference ID 8b at this time, and table reference ID 8a will remain ID 8.

ACTION: Distributors to monitor how long it currently takes them to perform some of the more time-consuming corrections.

- The group then discussed how long should be the maximum that a site could go without billing. The group decided 70 calendar days should be the maximum between a site's tariff bill files. As there is already a performance requirement that states the maximum time between a site's tariff bill files (table reference ID 13), the group decided to clarify the wording of table reference ID 13 to make it clear that the maximum amount of time a site can go without billing is 70 calendar days.

ACTION: AUC staff to change table reference ID 13 to allow for a maximum of 70 calendar days between a site's tariff bills.

Table 2-2 Performance requirements, table reference ID 1 and table reference ID 2 (which AUC staff is proposing to move to the end of Table 2-1 becoming table reference ID 17 and table reference ID 18)

- For the performance requirement titled currency of tariff bill file content and the performance requirement titled file completeness, both begin with the phrase: "Percentage of all sites."
- The group discussed adding the phrase "eligible for billing" after the word "sites" so as to address the issue of new sites being created after their billing cycle but before month end. One distributor pointed out that it is currently counting newly created sites as being missed when they are created after the site was due to bill on cycle and therefore was not actually eligible to be included in that month's metric. The group also discussed whether the same issue would apply to sites where a retailer switch has occurred. The group concluded that new sites should not be included in the performance requirement but sites where a retailer switch has occurred should. ENMAX Power agreed to provide the language for the rule to best address how to exclude sites created after their billing cycle from the calculations.

ACTION: ENMAX Power to provide language for the rule to best address how to exclude sites created after their billing cycle from the calculations.

2.16 Data retention

- AUC staff explained to the group that it would be adhering to its original proposal to change the data retention period from two years to three years for the following reasons:
 - Distributors that currently provide a single one-time charge record to adjust all periods outside of the data retention period (as opposed to multiple records aligned with the billing periods) had indicated that changing to multiple one-time charge records would be costly.
 - However most distributors had indicated that the majority of cancel/rebills involve periods within the past three years.
 - Therefore, expanding the data retention period would address most cancels and rebills without requiring multiple one-time charge records.
 - Consequently, the risk of the retailer billing systems automatically applying the one-time charge to the current customer and not being discovered as belonging to a prior customer would not be an issue as frequently.
 - Retailers will rarely have to manually handle adjustments and spreadsheets that support one-time charges, and the costs of the manual handling of spreadsheets and adjustments across multiple customers will be reduced.
 - AUC staff indicated it believes the costs of data storage are lower in the long run than the costs of processing manual adjustments.
- EPCOR Distribution & Transmission indicated that increasing its data retention from two years to three years would involve a database upgrade and a substantial investment. Rather than going ahead with an upgrade, it proposed the idea of having the rule require either three years of data retention or splitting the one-time charges by billing period. There were no objections by the rest of the group, so AUC staff indicated that it would draft language to allow for either approach.

ACTION: AUC staff to revise its proposal to require either three years data retention or two years data retention along with the requirement of providing multiple one-time charge records that align with the billing periods when performing cancel/rebills for periods beyond the data retention period.

- One distributor expressed concerns with the proposed language which states: "Distributors are obligated to retain tariff billing data in its original format for a minimum of three years, after which time information used in the derivation of tariff billing data must be retained for an additional four years." Its concern was that the wording was unclear as to the requirement for those distributors that currently have more than three years data retention. For example, if a distributor has seven years in original tariff bill file format, would it be required to retain an additional four years of information used in the derivation of tariff billing data in addition to the seven years? AUC staff

explained that the intent was to have a total of seven years of data available (three years in original format and four years that could be used to support invoice data) and not to have four years in addition to the data retention period if the data retention period was longer than three years.

ACTION: AUC staff to change the proposed language to read as follows: “Distributors are obligated to retain tariff billing data in its original format for a minimum of three years. Information used in the derivation of tariff billing data must be retained for a minimum of seven years.”

3.2 Tariff billing events, Section 3.2(2)(d), Footnote 5

- AUC staff is proposing to remove the following sentence: “However, due to system limitations, FortisAlberta cannot universally split charge component records as a result of a charge period event.”
- There were no objections to the removal of this sentence, but FortisAlberta noted that it would be implementing a universal split solution as of January 1, 2015. Periods after the implementation will have the universal split, whereas any period before January 1, 2015, will look like they do now. The group discussed whether this would pose any problems and concluded that this would only be an issue with cancels and rebills. Since cancels must look the same as they originally did, the application of universal splits on a go-forward basis would not be a problem.

4.12 Tariff billing sites withheld (TSW), NEW

- AUC staff is proposing to move the TSW transaction from the appendices to the body of the rule as an optional transaction with the following description:
The TSW transaction is an optional transaction that enables a distributor to inform a retailer of sites withheld from presentation in a published tariff bill file in an automated fashion. This transaction can be utilized to communicate to a retailer failure of standard content validation tests and production failures for a specific site. It can also be used to communicate that a site is being withheld while investigations, adjustments or corrections are taking place that may impact the site’s billing. The contents of the TSW transaction are provided in Table 4-19.
- There were no objections to the proposed changes; however, EPCOR Distribution & Transmission was the only distributor that indicated it would be using the transaction.

5.4 Cancel/rebill, Section 5.4.1(3)

- AUC staff had proposed introduction of the following subsection: “If the need for a cancel and rebill has been identified and confirmed, 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 tariff bill file publish date, the distributor must either send a tariff billing sites withheld transaction (TSW) on the site’s scheduled tariff bill file publish date as described in Section 4.12 or communicate to the retailer the reason for not billing the site through some other means jointly agreed to by the parties.”

- Since the group had earlier decided that we would not be proceeding with a prescribed timeframe for producing cancels and rebills after an error is identified and confirmed, AUC staff pointed out that this subsection would no longer work. The group discussed whether or not it should be modified to be used in cases where sites are being withheld from billing because of an error being investigated. As sites are now only missing or being withheld for a maximum of one billing cycle and must be billed within 70 days, retailers indicated that communication by email or TSW would not be necessary, as long as retailers can reach out and obtain information from the distributors when they need to. Therefore, all parties present agreed that the new Section 5.4.1(3) is no longer required.

ACTION: AUC staff to no longer introduce the new Section 5.4.1(3).

5.4 Cancel/rebill, Section 5.4.1(4)

- AUC staff had proposed the following revision to Section 5.4.1(4): “All cancels and rebills identified and processed by a distributor within three years 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 .”
- The reference to three years within the proposed language was intended to align with the data retention period. To accommodate the agreement to allow for EPCOR Distribution & Transmission to have only a two-year data retention period, AUC staff agreed to change the language to refer to the distributor’s data retention period instead.

ACTION: AUC staff to change the language in Section 5.4.1(4) to refer to the distributor’s data retention period.

5.4 Cancel/rebill, Section 5.4.1(5), NEW

- AUC staff had proposed the following new Section 5.4.1(5): “All cancels and rebills identified and processed by a distributor that extend beyond a distributor’s data retention period and/or beyond the period of adjustment as defined in the distributor’s terms and conditions must be sent to retailers as part of a tariff bill file according to the requirements in Section 5.4.4.”
- There were no objections to the proposed changes.

5.4.4 Cancels and rebills of charges spanning extended periods, NEW

- AUC staff had proposed the following new section:
 - (1) In situations where cancels extend back beyond the distributor’s data retention period, and the distributor’s terms and conditions and other rules and regulations support rebills for the entire period being cancelled, the distributor will:
 - (a) Cancel and rebill as many charges as it has online following the production rules described in Section 5.4.1.1.
 - (b) Create one or more one-time charge adjustments as described in Section 4.3.9 that summarize the charges that span the period beyond the data retention period. The one-time charge adjustments must use the prior period

- adjustment code (PPAD) and the date used for each one-time charge must be within the period that the retailer was the retailer of record. Each One-Time Charge record must not include any adjustments for periods for which the retailer was not the retailer of record.
- (c) Communicate to the retailer the calculation details that support the charge adjustment and the reasons for the charge adjustment.
- (2) In situations where cancels extend back beyond the distributor's data retention period, but the distributor's terms and conditions or other rules or regulations do not support rebills for the entire period being cancelled, the distributor will:
- (a) Cancel and rebill as many charges as it has online following the production rules described in Section 5.4.1.1.
 - (b) Reverse periods that fall within the data retention period but beyond the period to be adjusted using a series of one-time charges as described in Section 4.3.9. All dates in the Charge Date field in the 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.
- (3) In situations where cancels extend back beyond the period for adjustment supported by the distributor's terms and conditions and by other rules and regulations but fall within the distributor's data retention period, the distributor will:
- (a) Cancel and rebill all of the charges following the production rules described in Section 5.4.1.1.
 - (b) Reverse periods that fall beyond the period to be adjusted using a series of one-time charges as described in Section 4.3.9. All dates in the Charge Date field in the 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.
- AUC staff indicated that the proposed section may need revisions due to the changes that had been agreed upon earlier in the meeting. Consequently, AUC staff will review the language and circulate a revised proposal to the group before the next meeting.

ACTION: AUC staff to review the language and circulate a revised proposed Section 5.4.4 to the group before the next meeting.

Appendix B5.22 One-Time Charge Code

- AUC staff had proposed the addition of the following paragraph: "Each distributor must include the code "PPAD" (prior period adjustment) in their OCF to be used only in the case where a cancel and rebill is for periods beyond the distributor's data retention period and the date in the Charge Date field of the One-Time Charge record does not correspond to the charge period being corrected."

- One distributor questioned whether PPAD would be too large for the data type/size of the One-Time Charge Code field. AUC staff committed to confirming that “PPAD” would be allowed by the rule. Other than that, the group had no issues with the proposed addition.

ACTION: AUC staff to determine whether PPAD would be too large for the data type/size of the One-Time Charge Code field.

Table F2-2, (which AUC staff is proposing to move to the end of Appendix A, formerly Appendix B, to become Table A5-25)

Table Ref ID	Site Production Reason Code	Site Production Reason Code Name
1	2500	Site withheld due to failure of standard content validation tests
2	2501	Site withheld due to failure of production validation tests
3	2502	Site withheld due to tariff calculation errors
4	2503	Site withheld due to investigating a potential site ownership correction
5	2504	Site withheld due to investigating a potential meter read correction
6	2505	Site withheld due to investigating a potential crossed meter situation
7	2506	Site withheld due to investigating a potential multiplier correction
8	2507	Site withheld due to other reasons

- EPCOR Distribution & Transmission pointed out that it would be the only one using the TSW transaction; consequently, it questioned whether it would be necessary to change the codes from the current ones it uses. The group agreed that changing the codes would not be necessary.

ACTION: AUC staff to make Table A5-25 the same as the current Table F2-2.

3 Next steps

The next Rule 004 meeting will be in mid-November 2014. AUC staff will communicate meeting details and materials to all participants in advance of the meeting.