

## AUC Rule 021 and Rule 028 Industry Consultation Meeting Summary

**Meeting date** February 18, 2015 **Time** 11 a.m. to 3 p.m.

**Location** Video conference AUC offices **Facilitator** AUC staff  
 Tenth Floor, 10055 - 106 Street  
 Edmonton  
 Fourth Floor, 425 First St. S.W.  
 Calgary  
Teleconference  
 Phone: 1-866-792-1318  
 Conference code: 8665992

### 1 Introductions

Name	Company
Flora van Wageningen	AESO
Mike Choboter	AESO
Steve Glass	Alberta Utility Billing Inc.
Linda Kinnee	AltaGas Utilities Inc.
Steve Lai	AltaGas Utilities Inc.
Bob Deyl	ATCO Electric Ltd.
Enrique Nino	ATCO Electric Ltd.
Jessica Laird	ATCO Electric Ltd.
Mary Lou Pura	ATCO Electric Ltd.
Carol Benoit	ATCO Gas
Jennifer Bell	ATCO Gas
Andrea Laroiya	AUC
Raymond Lee	AUC
Rose Ferrer	AUC
Paula Robertson	City of Red Deer
Lori Harnack	Cognera Corp.
Natasia Wasson	Cognera Corp.
Karen Cooke	Direct Energy
Marcelo Maciel	Direct Energy
John Hutchison	ENMAX Commercial Services Inc.
Helen McKinlay	ENMAX Encompass
Paul Lindsay	ENMAX Power
Christine Harkness	EPCOR Distribution & Transmission Inc.
Hala Elsaadi	EPCOR Distribution & Transmission Inc.
Jeff McNeill	EPCOR Distribution & Transmission Inc.
Jonathan Harkness	EPCOR Distribution & Transmission Inc.
Jennifer Burke	EPCOR Energy Alberta Inc.

Name	Company
Joel Milne-Epp	EPCOR Energy Alberta Inc.
Naomi Broni	EPCOR Energy Alberta Inc./Encor by EPCOR
Ralph Steendam	EQUUS REA Ltd.
Brian Neufeld	FortisAlberta Inc.
Tina Dulguerov	FortisAlberta Inc.
Sally Legaspi	Just Energy
Lori Schultz	MIDAS Metering Services Ltd.
Susan Enskat	UCA
Joanne Mulders	Utility Network & Partners Inc.

## 2 AESO updates

- 2014 compliance update
  - AESO staff provided the group with a brief year-end statistical review and update on overall compliance performance for 2014. As AESO staff continues to work with market participants, the number of suspected non-compliant transactions has decreased substantially since 2012 from 162,884 to 10,805, and has steadily been decreasing since 2011.
  - The majority of suspected non-compliant transactions in 2012 related mainly to micro-generation and the post-final adjustment mechanism (PFAM) process. Because micro-generation was fairly new for smaller retailers and involved a lot of manual work, and due to a few badly formatted SID files, this resulted in higher numbers of non-compliant transactions. As AESO staff continued to work more with the PFAM process, the number of suspected non-compliant transactions in 2013 decreased to 86,373. In 2014, the numbers dropped drastically to 10,805 records. AESO staff advised the group that from a formatting and validation perspective, parties were performing extremely well, and where there were problems, the market was responding and self-correcting itself. The majority of suspected non-compliant records in 2014 related to the PFAM of odd scenarios, and it was recognized by AESO staff that participants cannot program for every situation. Overall, compliance performance for 2014 was extremely positive.
- Rule 021, Section 5.3.3(c)
  - For awareness purposes, AESO staff indicated that all but one of the LSAs is using monthly frozen profiles as opposed to daily profiles to avoid discrepancies on the usage balance during the PFAM process. The LSA which indicated that it is using the daily frozen profile advised that it is not seeing any significant discrepancies when balancing the site usage.

## 3 Load Settlement Agent yearly audits

- AESO staff provided a brief update regarding its plans to undertake yearly load settlement audits, with the goal of providing assurances to the market that processes are being validated and looked at responsibly by the LSAs. It clarified that its role is not to audit the LSAs or make the process more onerous for parties, but rather, the intention of the audits is to focus on the underlying processes to ensure that they are sound and reliable. It plans on proposing additional details to Section 2.13 and Section 6.5.3 of Rule 021 in order to explain what parties can expect in terms of a review. AESO staff asked the group for comments and feedback regarding its plans to carry out regular audits.

- A number of parties did not see the benefit of having another audit process in addition to AESO's already sophisticated load-settlement process. The group questioned whether the code needs to be updated, and asked AUC staff to provide their input regarding what types of specifics, if any, would need to be included in future versions of Rule 021 regarding yearly load settlement audits.
- As mentioned by AUC staff, when the LSA engine was initially included in the code, the processes were not as stable as they are now. AUC staff advised that it would review Sections 2.13 and 6.5.3 contained in Rule 021, and work offline with AESO staff to determine if revisions are required for these two sections. Once this has been completed, AUC and AESO staff will update the Rule 021 and Rule 028 Industry Consultation group.
- The group had no objections.

**ACTION: AUC staff to review Sections 2.13 and 6.5.3 contained in Rule 021, and work offline with AESO staff to determine if revisions are required for these two sections. Once this has been completed, AUC and AESO staff will update the Rule 021 and Rule 028 Industry Consultation group.**

#### 4 RIM issue 473 – Rules 021 and 028 – Deemed time

- AUC staff reminded the group that a copy of the deemed time spreadsheet had been re-circulated to distributors requesting examples of their methodology for deeming time. An updated spreadsheet has since been posted on the AUC website under the Rule Development tab, Rule 021 – <http://www.auc.ab.ca/rule-development/settlement-system-code/Pages/default.aspx>.
- In addition, AUC staff had also re-circulated an attachment explaining FortisAlberta's misalignment of the WSD and tariff bill file consumption to be reviewed by the group.
  - FortisAlberta advised the group that through the implementation of its new settlement system, it plans on fixing the misalignment between the WSD and tariff bill file consumption. However, until it is able to make the correction in its new system and perform testing, it cannot assess the impacts, if any, to the market. Additionally, FortisAlberta is unable to provide an exact date on when its settlement system will be replaced, but anticipates by December 31, 2015.
  - FortisAlberta expressed that this would be an on-going process, and therefore it would keep all parties updated on its progress with respect to correcting the misalignment of the WSD and tariff bill file consumption.
  - The group agreed to keep RIM issue 473 open in the meantime.

#### 5 RIM issue 517 – Rule 028 – PFAM process for gas

- During the October 1, 2014, AUC Rule 021 and Rule 028 Industry Consultation meeting, Cogenera had committed to providing Encore by EPCOR and ENMAX Encompass with an update on past discussions held by the PFAM Process for Gas Working Group. At the meeting, Cogenera confirmed that an update had been provided to both parties.
- AUC staff asked retailers whether they had an update on the status of their discussions about possible requirements for a potential PFAM type process for gas. The group had no comments.
- Retailers requested that RIM issue 517 be put on hold for now until they discuss this issue further.

## 6 RIM issue 525 – Rule 021 – Future site lock transaction

- Action item from the October 1, 2014, AUC Rule 021 and Rule 028 Industry Consultation meeting: “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.”
  - AUC staff had raised RIM issue 525 to open discussion regarding whether or not Rule 021 should contain provisions regarding site locks similar to those in Rule 028. The rationale was that although the site lock process is optional, there is a mandatory transaction that the retailer must send to the distributor when payment is received if a site lock is used (RCL transaction).
  - A number of parties expressed that they were not in favor of including optional transactions into Rule 021, and agreed that although the RCL transaction is mandatory, the use of site locks is still optional.
  - The group suggested that AUC staff re-examine the rule internally in order to determine whether a provision regarding site locks in Rule 021 is required. In the meantime, the group agreed that RIM 525 could now be closed. Should it be determined that a provision is required, AUC staff will re-open RIM issue 525 for further discussion.

**ACTION: AUC staff to re-examine the rule internally in order to determine whether a provision regarding site locks in Rule 021 is required.**

**ACTION: AUC to close RIM issue 525.**

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

- Action item from the October 1, 2014, AUC Rule 021 and Rule 028 Industry Consultation meeting: “AltaGas Utilities to confirm whether it sends its SMCs for the same site in sequential order by effective date.”
  - In the October 1, 2014, meeting, EPCOR Energy had indicated that it was encountering problems with how some distributors were backdating SMCs after correction. In order to avoid problems with how the information is loaded into its systems, EPCOR Energy requested that distributors send backdated SMCs in chronological order by effective date. Other than AltaGas Utilities, all distributors present at the October 1, 2014, meeting confirmed that they send backdated SMCs in chronological order by effective date.
  - As a follow up to the October meeting, AltaGas Utilities confirmed that it also sends its SMCs for the same site in sequential order by effective date.
- Action items from the October 1, 2014, AUC Rule 021 and Rule 028 Industry Consultation meeting: “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” and “Retailers to follow up to determine whether or not FortisAlberta’s implementation approach to providing SMCs after a backdated correction of sending on per site per day is causing customer impacts.”
  - As previously discussed in the October 1, 2014, meeting, FortisAlberta had 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.” In order to determine whether FortisAlberta’s approach is creating enough problems to warrant the expense of making a major system change, EPCOR Energy agreed to follow up on the severity of impacts it is experiencing, and retailers agreed to follow up on whether FortisAlberta’s approach is causing customer impacts.

- All retailers present, along with EPCOR Energy, confirmed that there are no issues arising from FortisAlberta's current approach of sending one SMC a day in cases where multiple SMCs are required to correct past SMCs.
- AUC staff asked the group to confirm that this issue could now be closed. The group agreed.

**ACTION: AUC staff to close RIM issue 528.**

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

- Action item from the October 1, 2014, AUC Rule 021 and Rule 028 Industry Consultation meeting: "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."
  - In response to scenario (1) as a competitive retailer, and (2) as an RRO provider, parties advised that they contact the customer and reinstate the contract as it was before. This is assuming that the customer accepts the terms and conditions and has chosen to be reinstated.
  - In response to scenario (3), competitive retailers and RRO providers advised that they carry through with an investigation process to determine whether it has erroneously enrolled a site.
- ATCO Gas had originally raised RIM issue 530 to discuss communication between the distributor, LSA and retailers, when a suspected erroneous enrolment has occurred.
  - ATCO Gas is in some instances notified by the UCA through escalated complaints of suspected erroneous enrolments. Subsequently, ATCO Gas sends a notification to both retailers (in separate emails) advising them that a site may be erroneously enrolled. However, despite its attempts in notifying both retailers of a suspected erroneous enrolment, there have been situations where either the existing retailer is not issuing the DSR, or the previous retailer is not re-enrolling the site within three business days from the date of notification from the LSA. Because a site is remaining erroneously enrolled even after notifications are being sent, ATCO Gas is requesting that the erroneous enrolment sections of Rule 021 and Rule 028 be expanded to resolve this issue.
  - The group debated ways in which the erroneous enrolment provisions contained in Rule 021 and Rule 028 could be revised to ensure that the DSR is being issued and that the site is being re-enrolled by the previous retailer. However, the group was unable to reach an agreement regarding how best to revise the existing language.
  - As no consensus was reached, AUC staff noted that it would take the issue offline and re-examine whether changes to the existing erroneous enrolment provisions are required at this time.
  - In the meantime, the group agreed to keep RIM issue 530 open.

**ACTION: AUC staff to take RIM issue 530 offline and re-examine whether changes to the existing erroneous enrolment provisions contained in Rule 021 and Rule 028 are required.**

- UCA staff expressed that potential impacts resulting from erroneous enrolments could be quite costly to a residential customer if un-attended to. In an attempt to understand the



number of customers potentially being affected by this issue, AUC staff asked UCA staff whether it could provide the group with statistics on how frequently it is having to reach out to the distributor regarding escalated erroneous enrolment complaints. The UCA committed to sending these statistics to [regulatorypolicy@auc.ab.ca](mailto:regulatorypolicy@auc.ab.ca).

**ACTION: UCA staff to send to regulatorypolicy@auc.ab.ca statistics regarding how frequently it is having to reach out to the distributor regarding escalated erroneous enrolment complaints.**

- In order to provide UCA staff with more visibility as to what is happening with erroneously enrolled sites once the distributor has sent a notification to retailers, ATCO Gas advised that it will no longer send two separate notifications. Instead, it will send one email to both retailers, and copy the UCA in its correspondence. The group had no objections with this practice.

## **9 RIM issue 531 – Rules 021 and 028 – SID – Cluster Correlation Key field and RIM issue 532 – Rules 021 and 028 – USA – Cluster Correlation Key field**

- As previously discussed in the October 1, 2014, AUC Rule 021 and Rule 028 Industry Consultation meeting, ENMAX Power suggested to the group that the data type/size of the Cluster Correlation Key field in the SID be changed from Number(6) to Number(13) and that the data type/size of the Area Name field be changed from Varchar(20) to Varchar(30). In addition, ENMAX Power also suggested that the data type/size of the Cluster Correlation Key field in the USA be changed from Number(6) to Number(13) and that the data type/size of the Area Name field be changed from Varchar(20) to Varchar(30).
- All parties present confirmed that making the following changes would not pose any problems. As such, there were no objections to the proposed changes. All parties agreed that since the fields are optional, implementation can wait until January 1, 2016.
- AUC staff agreed to change the data type/size of the Cluster Correlation Key field in the SID from Number(6) to Number(13), the data type/size of the Area Name field from Varchar(20) to Varchar(30), the data type/size of the Cluster Correlation Key field in the USA from Number (6) to Number(13) and the data type/size of the Area Name field from Varchar(20) to Varchar(30).
- Now that these revisions have been agreed to, the group agreed that RIM issue 531 and 532 can be closed.

**ACTION: In Rule 021 and Rule 028, AUC staff to change the data type/size of the Cluster Correlation Key field in the SID from Number(6) to Number(13), the data type/size of the Area Name field from Varchar(20) to Varchar(30), the data type/size of the Cluster Correlation Key field in the USA from Number(6) to Number(13) and the data type/size of the Area Name field from Varchar(20) to Varchar(30).**

**ACTION: AUC staff to close RIM issues 531 and 532.**

## **10 Critical to have power**

- FortisAlberta, ENMAX Power and ATCO Electric provided the group with an update regarding what their processes currently are and any future plans relative to critical-to-have-power customers and critical-to-have-power sites.
  - FortisAlberta confirmed that it distinguishes between critical-to-have-power customers and critical-to-have-power sites. In order to flag a customer as critical to have power in its system, it requires proper medical information for that customer, and should a flagged

customer phone in during an outage, FortisAlberta will move the customer to the top of its queue. It also indicated that for both planned and unplanned outages, it will notify its customers that an outage will occur or has occurred.

- ENMAX Power advised that it does not differentiate between a critical-to-have-power customers and critical-to-have-power sites, and it has no plans in the future to differentiate between the two. Instead, ENMAX Power employs the use of critical feeders; where in emergency situations, it does not shut down supply to its critical feeders. It encourages its customers to have back-up generation sources available during emergency situations. For planned outages, ENMAX Power will provide a notification of five business days using a letter drop, but will not notify customers when the power has been turned back on.
- Depending on the cost, ATCO Electric expressed that it may have plans in the future to differentiate between critical-to-have-power customers and critical-to-have-power sites. Currently, if a retailer sends information to ATCO Electric identifying a customer as critical-to-have-power for human medical reasons, it will update its system to reflect this information. If a retailer sends information identifying a site as critical-to-have-power, it will review the information and update its system accordingly.
- Cognera reminded the group that retailers had performed extensive cleanup of their data relating to critical-to-have-power customers. It expressed concerns as distributors are flagging its data as critical-to-have-power, however retailers are not marking their sites the same way.
- Direct Energy also reminded the group that now that its system change has occurred, it is now in the position to send updated UCIs. Direct Energy asked AUC staff for direction on how it would like Direct Energy to proceed with how to handle critical-to-have-power customers and sites. AUC staff advised that it would discuss this with Direct Energy offline.

**ACTION: AUC staff to discuss with Direct Energy offline how it would like Direct Energy to proceed with how to handle critical-to-have-power customers and sites now that its system change has occurred.**

## 11 Other issues

- 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 2015XX.
- AESO staff questioned whether what is listed in Table A-17 is referencing the loss group codes or something different. AESO staff noted that in looking at the table, the loss classes listed for the other zones match the loss group code used in the WSD with the exception of EDTI.
- EDTI advised that it would follow up internally and circle back with AUC and AESO staff regarding its request to add new loss class code 2015XX to Table A-17 of Rule 021.

**ACTION: EDTI to follow up internally and circle back with AUC and AESO staff regarding its request to add new loss class code 2015XX to Table A-17 of Rule 021.**