

AUC Rule 004: Tariff Billing Code Rules Working Group Meeting Summary

Meeting date May 14, 2015 **Time** 10 a.m. to 12 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
Anne Glass	Alberta Utility Billing Inc.
Steve Glass	Alberta Utility Billing Inc.
Linda Kinnee	AltaGas Utilities Inc.
Steve Lai	AltaGas Utilities Inc.
Mary Lou Pura	ATCO Electric Ltd.
Paula Fleming	ATCO Electric Ltd.
Shannon Rittmeyer	ATCO Gas
Andrea Laroiya	AUC
Maria Baitoiu	AUC
Raymond Lee	AUC
Rose Ferrer	AUC
Lori Harnack	Cognera Corp.
Janice Gee	Cognera Corp.
Karen Cooke	Direct Energy
John Hutchison	ENMAX Commercial Services Inc.
Helen McKinlay	ENMAX Encompass
Leslie Strickland	ENMAX Encompass
Sue Boyd	ENMAX Power
Jeff McNeill	EPCOR Distribution & Transmission Inc.
Cindy Dies	EPCOR Energy Alberta Inc.
Jennifer Burke	EPCOR Energy Alberta Inc.
Ralph Steendam	EQUUS REA Ltd.
Deb Crossman	FortisAlberta
Darcy Mazurkewich	FortisAlberta
Mary Thomas	UCA

2 Implementation issues and testing

- AUC staff asked whether parties had any implementation issues that needed to be addressed as a result of the changes made to Rule 004, which were approved by the Commission on March 11, 2015 and effective April 1, 2015.
 - FortisAlberta anticipates having the capability to produce its invoices as TBIs by July 1, 2015, and also projects that by the end of 2015, it will be able to offset one-time charges by billing period. ENMAX is undergoing a major system change and indicated that it would be ready to implement Rule 004 changes by the end of November. All other parties present indicated their systems would be ready by the end of September.
 - There were no other issues raised regarding the recent changes made to Rule 004.
- The group also discussed whether there was any need for market-wide testing to occur. Given the changes made to Rule 004, the group agreed that market-wide testing is not required.

3 Use of Prior Period Adjustment Code (PPAC)

- There has been some confusion amongst parties regarding the use of PPAC; therefore AUC staff provided further clarification on the intended use of this code. As previously communicated in the [November 19, 2014, meeting summary](#) and the [March 24, 2015, AUC responses to stakeholder comments table](#):
 - PPAC is only to be used in the OCF 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 (OTC) record does not correspond to the charge period being corrected.
 - PPAC is not to be used if the distributor can align the OTC records with the charge periods when performing cancels and rebills of charges, spanning beyond the period that the distributor has tariff billing data in its original format.
- In the case of EDTI who committed to having two years of data retention, along with aligning its one-time charges by billing period, it will not need to use PPAC. EDTI mentioned that it would be coming up with a new OTC code accordingly.
- For all other distributors, AUC staff pointed out that since more than three years of data is generally retained; the use of PPAC will be a very rare occurrence.
- If in the future there are any issues with respect to the use of PPAC, parties are requested to inform the AUC.

4 Distributor to retailer calculation details – Section 4.3.9 One-Time Charge, Section 5.4.4 Cancels and rebills spanning extended periods

- EEA and Encor by EPCOR asked the group for clarification regarding what calculation details need to be communicated by distributors to retailers to support charge adjustments.

Section 4.3.9 One-Time Charge:

- EEA and Encor by EPCOR recommend that, at a minimum, the following calculation details be communicated by distributors to retailers: Charge Period, Usage and Total Charges.

- In addition, a further breakdown of the OTC into respective line items (i.e. distribution, transmission, local access fee and riders) when resolving customer escalations related to an OTC adjustment may be required.

Section 5.4.4 Cancels and rebills spanning extended periods

- For situations where the OTC spans multiple TBF periods, EEA and Encor by EPCOR recommend that, at a minimum, the following calculation details be sent by distributors to retailers: Charge period, usage and total charges. This will enable retailers to accurately adjust energy charges if monthly rates change.
 - For cases where the OTC is separated by individual TBF periods, EEA and Encor by EPCOR recommend that, at a minimum, the following calculation details be sent by distributors to retailers: Usage and total charges. This will enable retailers to adjust energy charges if monthly rates change.
 - In addition, a further breakdown of the OTC into the respective line items (distribution, transmission, local access fee and riders) when resolving customer escalations related to the OTC adjustment may be required.
- Parties agreed to work together to ensure that the appropriate calculation details are communicated by distributors to retailers for the cases mentioned above. It was also agreed that the mechanism for communicating this information to retailers would be in the form of an email, along with a spreadsheet containing the necessary calculation details.
 - Should any issues arise regarding the communication of these details from distributors to retailers, parties are requested to inform the AUC.

5 EEA discussion – Table 4-6 Demand determinant record content

- On behalf of Encor by EPCOR, EEA logged an issue under the Rule 004 discussion community asking stakeholders for clarification regarding rule requirements on Sequence 12 (Ratchet Datetime) and Sequence 13 (Ratchet Period Months) of Table 4-6 Demand Determinant record content.
- EEA wanted to clarify whether there were any instances that would result in a value of “0” for Sequence 12 and Sequence 13, and whether it was common to use a value of “0” for brand new sites which may not have any previous history available.
 - For those situations where there is no actual usage available to determine a ratchet, half of the parties advised that they populate Sequence 12 and Sequence 13 with “0”, whereas the other half noted that they populate these sequences using “Null”.
 - The group discussed in further detail Table 4-6 Demand Determinant record, in order to determine what this section of the rule stipulates. It was concluded that if the rate requires a ratchet but there is no demand history available, parties are to use the value “0”. If the rate does not require a ratchet, then parties are to use “Null”.
- AUC staff asked distributors to post within the Rule 004 Discussion Community how they populate Sequence 12 and Sequence 13 of Table 4-6 Demand Determinant record, for the following to scenarios:
 - 1) The rate requires a ratchet, but there is no demand history available (e.g. brand new site).
 - 2) The rate does not require a ratchet.

In addition, distributors to also advise what it would take for them to align with the provisions contained within Rule 004.

- All parties agreed to provide their comments through Discussion Community by June 15, 2015.

ACTION: Distributors to post, within the Rule 004 discussion, how they populate Sequence 12 and Sequence 13 of Table 4-6 Demand Determinant record, for the following two scenarios:

- 1) The rate requires a ratchet, but there is no demand history available
- 2) The rate does not require a ratchet

Distributors to also advise what it would take for them to align with the provisions contained within Table 4-6 Demand Determinant record of Rule 004.

Parties to provide their comments by June 15, 2015.

6 Section 5.4.1 General cancel and rebill production rules – AltaGas Utilities proposed work around

- AltaGas Utilities reminded the group of its intention to apply for a temporary exemption to Section 5.4.1 as it cannot fulfill the “must” requirement of sending the tariff bill period or one-time charge rebill records in the same tariff bill file as the associated cancel records, due to limitations with its current billing system.
- Specifically, instances where AltaGas Utilities has to perform a cancel and rebill for two or more billing periods, AltaGas Utilities may need to send the cancel and rebill records in separate TBFs. The more lengthy scenarios are rare and are a result of mixed or stopped meter situations.
- AltaGas Utilities presented its proposed workaround until its current billing system is replaced. A discussion took place and retailers asked questions to clarify the process and the reason for it. While retailers were not opposed to the proposed interim workaround, they provided AltaGas Utilities with a few suggestions in order to accommodate AltaGas Utilities’ system limitation. As a result, AltaGas Utilities agreed to modify the work around solution as follows:
 - (1) AltaGas Utilities will email retailers in advance, advising them of its plans to send multiple cancels and rebills. AltaGas Utilities will also advise on the expected number of charge periods and how long it will take to complete the work.
 - (2) Before proceeding with sending the cancels and rebills, retailers are to send AltaGas Utilities an email acknowledging that the previous email was received.
 - (3) Once an acknowledgement email has been received, AltaGas Utilities to proceed with sending the transactions to retailers. The sequence will be as follows: cancel from newest to oldest, then rebill from oldest to newest.
 - (4) Once all transactions have been sent, AltaGas Utilities will send a notification email to retailers confirming that the work has been completed.
- The group questioned how long this process could take. The example of six cancels and six rebills was used, and AltaGas Utilities advised that for this particular case it would take no more than 12 days to correct.

- The workaround may require retailers to put a hold in their system until all of the cancels and rebills have been received from AltaGas Utilities. One party asked whether it was possible to put a hold in AltaGas Utilities' system rather than in the retailers' system. AltaGas Utilities advised that it did contemplate this as it would be less inconvenient for the retailer, but due to a system design issue it is not able to put a hold on its system to accommodate this process.

7 Section 4.3.9 One-Time Charge – EPC comment

- EPC informed the group that in order to be able to charge the requesting retailer, as required under Section 4.3.9(5), it would have to make a change to its system which would be extremely costly. Section 4.3.9(5) stipulates the following: 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. EPC would like to be able to send the One-Time Charge record to the retailer of record.
- Due to a current system limitation, EPC is not able to recover costs related to certain types of service work. Although currently, it does not consider these situations to be material, it was concerned that these situations may become material in the future.
- One billing agent mentioned that if the charge is sent to the retailer of record and the customer disputes the charge, the retailer has no visibility and will therefore have to cover this charge. There was discussion that in most of the cases the customer that switches retailers is the same customer and it will be unlikely to dispute the charges. For the rare cases when the customer has actually disputed the charges, it was suggested that the distributor can reverse the one-time charge.
- EPC asked whether retailers would dispute the one-time charge if it was sent to the retailer of record rather than the requesting retailer.
 - Retailers agreed to follow-up on whether there would be any issues with EPC's proposal to send these one-time charges to the retailer of record, as opposed to the requesting retailer. AUC staff expressed concern that EPC's proposal would go against the current rule.
 - EPC agreed to log an issue under the Rule 004 Discussion Community highlighting the following details: Current practice relating to Section 4.3.9(5), proposal, type of service work and related fees (return trip fee for initial energization?), frequency of situations where the return trip fee cannot be charged and materiality of these situations.
 - Retailers agreed to provide their comments through Discussion Community by June 15, 2015.

ACTION: EPC to log an issue under the Rule 004 Discussion Community highlighting the following details: Current practice relating to Section 4.3.9(5), proposal, type of service work and related fees (return trip fee for initial energization?), frequency of situations where the return trip fee cannot be charged and materiality of these situations.

ACTION: Retailers to provide their comments to EPC's discussion on Section 4.3.9(5) by June 15, 2015.

8 Implementation date and next steps

- All parties agreed on an implementation date of Saturday, December 5, 2015.

- With the exception of PPAC, which parties agreed should not be implemented until December 5, 2015, parties are welcome to implement all other required changes in their systems before this date. However, should they choose to do so, parties are required to inform all participants that these system changes have been made.