

AUC Rule 021 and Rule 028 Industry Consultation Meeting Summary

Meeting date	June 17, 2015	Time	10 a.m. to 1 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
Anne Glass	Alberta Utility Billing Inc.
Steve Glass	Alberta Utility Billing Inc.
Linda Kinnee	AltaGas Utilities Inc.
Steve Lai	AltaGas Utilities Inc.
Enrique Nino	ATCO Electric Ltd.
Mary Lou Pura	ATCO Electric Ltd.
Carol Benoit	ATCO Gas
Jennifer Bell	ATCO Gas
Andrea Laroia	AUC
Maria Baitoiu	AUC
Rose Ferrer	AUC
Bettyann Skagen	Battle River REA
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
Leo Scarcelli	ENMAX Power
Paul Lindsay	ENMAX Power
Christine Harkness	EPCOR Distribution & Transmission Inc.
Hala Elsaadi	EPCOR Distribution & Transmission Inc.
Jeff McNeill	EPCOR Distribution & Transmission Inc.

Name	Company
Joel Milne-Epp	EPCOR Energy Alberta Inc.
Naomi Broni	EPCOR Energy Alberta Inc./Encor by EPCOR
Ralph Steendam	EQUUS REA Ltd.
Tina Dulguerov	FortisAlberta Inc.
Gordon Howell	Howell Mayhew Engineering, Inc.
Lori Schultz	MIDAS Metering Services Ltd.
Leonard Olien	Solas Energy Consulting
Mary Thomas	UCA
Susan Enskat	UCA
Joanne Mulders	Utility Network & Partners Inc.

2 Micro-generation meter reading, credit and appearance on customer bill – Presented by Gordon Howell

- Gordon Howell delivered a presentation and welcomed the opportunity to discuss with the group micro-generation meter readings, credits and the appearance of these items on customer bills.
- Gordon’s presentation highlighted the fact that micro-generation credits are not treated the same as load energy, and his proposal was that exported energy (export meter readings, exported energy, export energy pricing and export energy credits) be displayed on a customer’s bill in the same way that all energy retailers already display imported energy (imported meter readings, imported energy, import energy pricing and import energy charges).
- The group advised that the Rule 021 and Rule 028 Industry Consultation group does not have authority to make changes to the *Billing Regulation*, and such a proposal would need to be brought to the Department of Energy for consideration.

3 Load Settlement Agent yearly audits

- Action item from the February 18, 2015, AUC Rule 021 and 028 Industry Consultation meeting: “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 provide an update the Rule 021 and Rule 028 Industry Consultation group.”
 - The AESO recently provided AUC staff with a report which reviewed the audit/review procedures for the five LSAs operating throughout Alberta and provided recommendations. AESO staff reiterated to the group that the purpose of the audit is to provide the industry with some assurance that the settlement engines and processes are operating in compliance with AUC Rule 021. Currently, the AESO is working with AUC staff to better clarify what the audit should encompass and identify what areas currently fall outside what is already being reported to the AESO.
 - As each LSA system is different, one party mentioned that standardizing what is reported by each party may not completely capture the vulnerabilities of each system.
 - AUC staff advised that they are still in the process of conducting an internal review to determine whether revisions to Sections 2.13 and 6.5.3 are required, and will provide an update to the Rule 021 and Rule 028 Industry Consultation group once complete.

4 Discuss use of Table A-17 Loss Class Code – Rule 021

- Action item from the February 18, 2015, AUC Rule 021 and 028 Industry Consultation meeting: “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.”
 - A teleconference was held offline between AUC, EDTI and AESO staff, to discuss the use of Table A-17 Loss Class Code contained within Rule 021. Based on the discussion, it was concluded that all loss classes listed within Table A-17 are the same identifiers that are used in the WSD, with the exception of EDTI. Because most of EDTI’s loss class codes are customer specific, it has been updating Table A-17 with code numbers to maintain confidentiality and protect the customer’s name from being identified.
 - At the meeting, while the group contemplated whether Table A-17 was needed in Rule 021, a number of parties advised that they found the table useful for situations such as applying UFE and losses, and setting up a new retailer. As such, the group agreed that Table A-17 should remain in Rule 021.
 - Instead, the group suggested that EDTI update its loss class codes to be less customer specific, and provide loss class descriptions similar to those descriptions used by other parties. EDTI staff advised that it would need to follow-up internally to see if this could be done. In the meantime, AUC staff advised that it would work offline with EDTI on this issue, and will provide the Rule 021 and Rule 028 Industry Consultation group with an update at the next scheduled meeting. The group had no objections.

ACTION: EDTI staff to follow-up internally on whether it can update its loss class codes to be less customer specific and if it can provide loss class descriptions similar to those descriptions used by other parties in Table A-17 of Rule 021. AUC staff to work offline with EDTI on this issue, and an update will be provided at the next scheduled meeting.

5 VLTrader upgrade

- AUC staff were recently contacted by Cleo and informed that an upgrade to VLTrader is being made; version 5.2 of VLTrader will be released on July 6, 2015. As communicated by Cleo, those parties who have a current support subscription in place will receive version 5.2.
- Parties were asked whether they are operating on the most recent version of VLTrader, and if not, whether they have had any issues in the past with version compatibility. A number of parties advised that they remain generally up-to-date with upgrades, whereas others do not. Despite parties operating on different versions of VLTrader, there were no reported issues with compatibility.
- As many parties were not aware of the upcoming upgrade to VLTrader, AUC staff asked the group whether a teleconference between Cleo and market participants would be helpful so that parties would have an opportunity to learn more about the upgrade. The group requested the teleconference and AUC staff advised that it would arrange a teleconference between Cleo and market participants during the week of June 22, 2015.

ACTION: AUC staff to arrange a teleconference between Cleo and market participants during the week of June 22, 2015, to provide parties with an opportunity to learn more about the upgrades being made to VLTrader.

6 Discussion Community – Rule 021 and 028:

▪ Discussion 01, Rule 021, Limiter Parameters

- For informational purposes only, EDTI staff raised the following issue seeking clarification regarding the use of limiters. Aside from Sections 7.7, 7.8 and 7.9 of Rule 021, EDTI staff asked whether there were any other AUC rules that contained specific parameters regarding the use of limiters (e.g. is there a certain number of amps that parties are required to provide, timing before a reset period, etc.).
- Other than what is already outlined in Rule 021 regarding load limiters, AUC staff confirmed that there are no other AUC rules which highlight load limiter requirements.
- For those distributors using limiters, UCA staff questioned if these parties have additional protocols that they follow internally, to which the group answered yes. One distributor advised that it has discontinued the use of limiters completely.
- AUC staff asked the group to confirm that this issue could now be closed. The group agreed.

ACTION: AUC staff to close Discussion 01, Rule 021, Limiter Parameters.

▪ Discussion 02, Rule 021, DEC add reason code

- ENMAX Commercial Services staff asked the group to consider the addition of a Reason Code field when sending DEC and ENC transactions. Currently, there are situations where retailers are receiving unsolicited energize and de-energize completions without knowing the reason. In some cases, distributors will first contact the retailer and ask them to send an ENR or DER transaction, whereas in other cases the distributor will send the ENC and DEC transaction and follow-up with an email.
- The concern is that retailers are receiving unsolicited energize and de-energize completions without knowing what the underlying reasons are behind the completion. In addition, the retailer may not receive the email as it may not go to the correct retailers' email address.
- ENMAX Commercial Services staff expressed that adding a Reason Code field could help avoid confusion for the retailer.
- Parties indicated that adding an extra field to the transaction would be costly. One party indicated that under Section 2.5 of Rule 021, a WSP may energize or de-energize a site without a request from the retailer for reasons that include equipment testing, safety and requests from public protective services. AUC staff expressed that it would be helpful for distributors to notify retailers of unsolicited ENCs and DEC and the respective reasons.
- ENMAX Commercial Services staff requested distributors to include the retailer ID along with the reason in its emails when providing notice of an unsolicited ENC and DEC so that the correct retailer is notified. ENMAX Commercial Services staff will inform the group if it continues to experience issues. The group agreed to close this issue.

ACTION: AUC staff to close Discussion 02, Rule 021, DEC add reason code.

- Since AUC staff will be arranging a teleconference with Cleo to discuss the new version of VLTrader, one party suggested that the group ask whether there is functionality within the VLTrader system to email retailers. If so, it was contemplated whether group mailboxes could be setup within VLTrader to email various requests to retailers (e.g. erroneous enrolment, de-energize and energize request etc.). The group agreed that the use of

group mailboxes could be further discussed at the next scheduled Rule 021 and Rule 028 Industry Consultation meeting.

ACTION: During the upcoming teleconference which will be held between parties and Cleo to discuss the new version of VLTrader, parties to inquire whether there is functionality within the VLTrader system to email retailers.

- Discussion 03, Rule 021, Section 9.4.2(3) File naming conventions
 - Under Section 9.4.2(3) of Rule 021, AESO staff noted that parties are sending rejection files in two different ways. Since the AESO’s system can only be programmed to accept one method, it has asked that parties choose one way of sending these rejection files.
 - For example, the UCI is normally sent by the retailer to the WSP in the following format:

TRX_Retailer_WSP_YYYYMMDDHHMISS.CSV or
 TRX_Retailer_WSP_YYYYMMDDHHMISS.csv

At the moment, AESO staff are seeing rejection files being sent one of two ways from WSPs to the retailers:

1. TRX_Retailer_WSP_YYYYMMDDHHMISSR.CSV or
 TRX_Retailer_WSP_YYYYMMDDHHMISSR.csv

Or:

2. TRX_WSP_Retailer_YYYYMMDDHHMISSR.CSV or
 TRX_WSP_Retailer_YYYYMMDDHHMISSR.csv

- WSPs agreed to check whether it would be an issue to standardize the format of how it sends these rejection files to the retailers, and whether on a go-forward basis they are able to use method number one shown above. WSPs are to provide this information in Discussion Communities under the AESO’s existing issue by July 17, 2015. The following issue will remain open, and comments will be discussed at the next scheduled Rule 021 and Rule 028 Industry Consultation meeting.

ACTION: WSPs to advise whether on a go-forward basis they are able to send rejection files under Section 9.4.2(3) using the following method:

TRX_Retailer_WSP_YYYYMMDDHHMISSR.CSV

WSPs to provide this information under “Discussion 03, Rule 021, Section 9.4.2(3)” by July 17, 2015.

Revised deadline is September 2, 2015.

- In addition, AESO staff proposed that Section 9.6.3.1(4) be removed from Rule 021. Because the AESO’s system is already built to handle UCIs, they are already made aware of the number of UCI’s that are not being formatted correctly. Therefore, AESO staff did not see the benefit of having parties create a manual report as required under Section 9.6.3.1(4) in Rule 021 for separate UCI rejections. The group agreed with the removal of Section 9.6.3.1(4).

ACTION: AUC staff to remove Section 9.6.3.1(4) from Rule 021.

- Discussion 04, Rule 028, Delayed SROs

- ENMAX Encompass raised the following issue as it continues to experience instances where it is receiving delayed SRO's from the distributor in the case of a de-select. On some occasions, the default supply provider is not submitting the SRR to the distributor within the specified time as defined in Section 8.6.7.1 of Rule 028, therefore causing a delay on when the SRO is sent to the retailer. As a result, ENMAX Encompasses is not able to invoice its customers for the charges incurred after the expected switch date, and its concern is that it is having to absorb these charges itself.
- ENMAX Encompass staff advised that although these situations are not happening as frequently as they were in the Fall of last year, there are still a number of cases where this is occurring. There is no formal process in place to capture these situations internally, and ENMAX Encompass staff usually becomes aware of these cases when a customer has noticed they have been over billed past their requested move out date, or when it has been brought to their attention by another party. It noted one recent case where the SRO was delayed by 16 days. Encor by EPCOR staff indicated that it had experienced a similar issue in receiving delayed SROs, and agreed with ENMAX Encompass that although the number has reduced, there are still circumstances where this is occurring.
- Since implementing a new billing system, Direct Energy staff advised that it has been facing a number of technical issues – one being its ability to produce SRRs on time when responding to a Pending Enrollment Request (PER), a non-standard transaction sent by ATCO, when a competitive retailer is dropping a site within ATCO territory. In late March of this year, Direct Energy implemented a number of system and process improvements, and it has since seen a significant improvement in its performance. Although there are still a few gaps to improve on, Direct Energy staff expects to have close to 100 per cent of enrolments made on time by September 2015. In the meantime, it will continue to monitor these situations closely and work to resolve any exceptional issues that may arise.
- ENMAX Encompass and Direct Energy staff indicated that they would continue to monitor these types of scenarios, and any updates would be discussed at the next scheduled Rule 021 and Rule 028 Industry Consultation meeting.

ACTION: ENMAX Encompass and Direct Energy to continue monitoring cases of delayed SROs. Updates will be discussed at the next scheduled Rule 021 and Rule 028 Industry Consultation meeting.

- Former RIM issue 530, Rules 021 and 028, Erroneous enrolment process
 - UCA staff provided the group with updated statistics on how frequently it is having to reach out to the distributor regarding escalated erroneous enrolment complaints. Since February 2015, UCA staff noted a significant increase in the number of complaints for the months of March, April and May 2015. UCA staff attributes the increase in numbers to technical challenges that Direct Energy is currently facing and working to improve on as a result of its new billing system which was implemented in October 2014.
 - As agreed to during the last Rule 021 and Rule 028 Industry Consultation meeting, AUC staff reminded the group that in order to provide more visibility to parties regarding erroneous enrolments, the distributor will now send one email notification to both retailers and copy the UCA in its correspondence. AUC staff requested a status update from ATCO (and other distributors), the UCA and retailers regarding the new email process and asked whether this process was useful for parties.
 - Parties indicated that the new email process has not been fully implemented, and although distributors are now sending one email notification to both retailers, the UCA is not being

copied on the initial correspondence. Instead, the UCA is being notified in advance by the distributor that an email will be sent to both retailers.

- One retailer also expressed that it is still encountering situations where the retailer that had the site previously is not re-enrolling it.
- Going forward, distributors advised that they will put into practice the process of sending one email notification to both retailers, along with a copy to the UCA in its correspondence. In addition, retailers agreed to communicate with one another to ensure that the previous retailer is re-enrolling the site within three business days from the date of notification from the LSA as specified in the Rules. UCA staff advised that it would follow-up with retailers on an as needed basis to ensure resolution is reached for those customers that are raising escalated erroneous enrolment cases with the UCA.
- One party questioned whether the new email process should be used for all erroneous enrolment situations, or only for those cases involving the UCA. It was determined that at this time the UCA should be copied on cases where they have initiated the concern, and parties will report back on how this new email process is working at the next meeting.

ACTION: Parties to report back at the next meeting on how the new process of distributors emailing both retailers and copying the UCA is working in the case of an erroneous enrolment.

- Discussion 05, Rule 021, UCI outage notification phone number
 - ATCO Electric raised the following issue to discuss how other distributors decide which phone number to use when contacting customers to inform them of a planned outage, and whether it would be beneficial to have an indicator to identify a site contact's preferred phone number for outage notifications.
 - Currently, ATCO Electric utilizes the site contact's phone numbers provided in the UCI when issuing an automated outbound call to notify its customers of a planned outage. However, since multiple phone numbers are listed and there is no indicator identifying a customer's preferred number, ATCO Electric has to employ a hierarchal method to determine which Outage Notification number to use (starts with the home number, then the business number, and then the mobile number (if provided) on file, and continues down the list until the outbound call goes through).
 - One distributor suggested that Sequence 59 of Table 22 contained in Rule 021 be changed from "Site Contact Phone Number" to "Preferred Site Contact Phone Number". Retailers noted that they would validate whether Sequence 59 is currently being populated with the site contact's preferred number, and will provide this information under ATCO Electric's existing issue in Discussion Communities by July 17, 2015. Comments will be discussed at the next scheduled Rule 021 and Rule 028 Industry Consultation meeting.
 - Although it would not be a problem to change the field, one retailer mentioned that it will be a challenge to contact all of the customers and obtain the appropriate information to populate the field with.

ACTION: Retailers to validate whether Sequence 59 of Table 22 in Rule 021 is currently being populated with the site contact's preferred number.

Retailers to provide this information under "Discussion 05, Rule 021, UCI outage notification phone number" by July 17, 2015.

Revised deadline is September 2, 2015.

7 Other issues

- For ease of use, the group agreed that the existing categories under the Rule 021 and Rule 028 Discussion Community (01 Electric, 02 Gas, and 03 Electric and Gas) be consolidated into one category titled "Electric and Gas". It was also agreed that a "Closed" category be added to the Rule 021 and Rule 028 Discussion Community.

ACTION:

AUC staff to consolidate the following categories under the Rule 021 and Rule 028 Discussion Community: 01 Electric, 02 Gas, and 03 Electric and Gas, into one category titled "Electric and Gas".

In addition, AUC staff to create a "Closed" category within the Rule 021 and Rule 028 Discussion Community.

- AUC staff also advised that the stamp which displays the number of discussions and replies is not always accurately reflected within Discussion Communities (may indicate zero discussions and zero replies, when this is not actually the case). AUC staff is currently working internally with its IT department to resolve this issue.
- The next Rule 021 and Rule 028 meeting will be scheduled for the week of September 21, 2015. AUC staff will communicate meeting details and materials to all participants in advance of the meeting.