

Rule 002 Proposed changes for 2016

[Stakeholder: AltaGas Utilities Inc. (AltaGas), ATCO Electric, ATCO Gas, City of Calgary, ENMAX Power Corporation (EPC), EPCOR Distribution & Transmission (EDTI), FortisAlberta Inc. (FortisAlberta)]

Section	Subsection	Existing	Proposed changes	Stakeholder comment	AUC response
4 Measurements of performance and service quality standards for owners of electric distribution systems	4.1.4 Currency of tariff bill file content	<p><i>Method of calculation of performance:</i></p> <p>Percentage of sites billed and coded regular billing cycle that are billed within the required eight business days = [(number of sites within original tariff bill files with a site production reason code of 2020 where the tariff bill file date created minus the current bill period end date for each site is less than or equal to eight business days) ÷ (the total number of sites with a site production reason code of 2020 in original tariff bill files)] x 100</p>	<p><i>Method of calculation of performance:</i></p> <p>Percentage of sites billed and coded regular billing cycle that are billed within the required eight business days = [(number of sites within original tariff bill files with a site production reason code of 2020 where the tariff bill file date created minus the current bill period end date for each site is less than or equal to eight business days) ÷ (the total number of sites with a site production reason code of 2020 in original tariff bill files – ineligible sites)] x 100</p> <p>Where:</p> <p>Ineligible site = Site that was initially energized after its scheduled read date for the month.</p>	<p>ATCO Electric: ATCO Electric notes that the proposed revision to exclude ineligible sites from the calculated in sub-section 4.1.4 may artificially inflate the results or lead to a situation where the results could be in excess of 100%. This is due to the fact that the ineligible sites (as defined in 4.1.4) would not have produced an original tariff bill file with a site production reason code of 2020 and are not included in the initial data set. Therefore, it is not appropriate to remove these sites from the calculation.</p> <p>EDTI: EDTI does not have any sites that qualify for the provided definition of ‘ineligible sites’ for this metric.</p> <p>Sites are billed on the regular cycle when they are enrolled with a retailer. Subsequently, sites are</p>	<p>The proposed wording around ineligible sites was intended to reflect changes to Rule 004 effective April 1, 2015, which was agreed to by stakeholders during Rule 004 consultation.</p> <p>The Commission agrees with ATCO Electric’s and FortisAlberta’s comments. The Commission will not include the proposed change in the final version of Rule 002.</p> <p>The Commission acknowledges that until such time that AUC Rule 004 can be revised, a discrepancy will exist between the currency calculation in AUC Rule 002 and the calculation in AUC Rule 004.</p>

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				<p>energized and meter reads are obtained and billed on the next regular cycle. EDTI will not be making changes to the way it currently calculates this metric.</p> <p>EDTI requests that 'ineligible sites' be explained in the Rule 002 in more detail, with examples provided.</p> <p>EPC: EPC agrees with the proposed change.</p> <p>FortisAlberta: FortisAlberta Inc. objects to the proposed currency calculation modification in section 4.1.4 of AUC Rule 002 for the following reason.</p> <p>Ineligible sites do not generate a tariff bill file record with a 2020 production reason code. Because they are initially energized after the scheduled read date it is impossible for the site to have a scheduled read. This means that ineligible sites are neither included in the divisor or dividend of the currency calculation. Therefore no adjustment of the calculation is required.</p> <p>FortisAlberta Inc. realizes that until such time that AUC</p>	

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				<p>Rule 004 can be revised, a discrepancy would exist between the currency calculation in AUC Rule 002 and the calculation in AUC Rule 004. However the principle of correctness in the reported numbers should override the concern of consistency.</p>	

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	4.1.5 Tariff bill file completeness	<p><i>Method of calculation of performance:</i></p> <p>Percentage of sites expected to bill on each billing cycle that are billed and coded regular billing cycle on their scheduled tariff bill file publish date = [(number of sites assigned to billing cycles and transmitted in original tariff bill files on their scheduled tariff bill file publish date with a site production reason code of 2020) ÷ (total number of sites expected to bill for those billing cycles)] x 100</p>	<p><i>Method of calculation of performance:</i></p> <p>Percentage of sites expected to bill on each billing cycle that are billed and coded regular billing cycle on their scheduled tariff bill file publish date = [(number of sites assigned to billing cycles and transmitted in original tariff bill files on their scheduled tariff bill file publish date with a site production reason code of 2020) ÷ (total number of sites expected to bill for those billing cycles - ineligible sites)] x 100</p> <p>Where:</p> <p>Ineligible site = Site that was initially energized after its scheduled read date for the month.</p>	<p>ATCO Electric: ATCO Electric is fine with the proposed change which removes the ineligible sites from the calculation of this measure.</p> <p>EDTI: EDTI does not have any sites that qualify for the provided definition of 'ineligible sites' for this metric.</p> <p>Sites are billed on the regular cycle when they are enrolled with a retailer. Subsequently, sites are energized and meter reads are obtained and billed on the next regular cycle. EDTI will not be making changes to the way it currently calculates this metric.</p> <p>EDTI requests that 'ineligible sites' be explained in the Rule 002 in more detail, with examples provided.</p> <p>EPC: EPC agrees with the proposed change.</p> <p>FortisAlberta: FortisAlberta Inc. has no objections to the proposed changes to section 4.1.5 of Rule 002.</p>	<p>The AUC has determined that further consultation is required to clarify the definition and use of "ineligible sites" in this metric and did not include the proposed change in the final version of Rule 002.</p> <p>The Commission acknowledges that a discrepancy will exist between the completeness calculation in AUC Rule 002 and the calculation in AUC Rule 004.</p>

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5 Performance categories and standards for gas distributors	5.1.4 Currency of tariff bill file content	<p><i>Method of calculation of performance:</i></p> <p>Percentage of sites billed and coded regular billing cycle that are billed within the required eight business days = [(number of sites within original tariff bill files with a site production reason code of 2020 where the tariff bill file date created minus the current bill period end date for each site is less than or equal to eight business days) ÷ (the total number of sites with a site production reason code of 2020 in original tariff bill files)] x 100</p>	<p><i>Method of calculation of performance:</i></p> <p>Percentage of sites billed and coded regular billing cycle that are billed within the required eight business days = [(number of sites within original tariff bill files with a site production reason code of 2020 where the tariff bill file date created minus the current bill period end date for each site is less than or equal to eight business days) ÷ (the total number of sites with a site production reason code of 2020 in original tariff bill files – ineligible sites)] x 100</p> <p>Where:</p> <p>Ineligible site = Site that was initially energized after its scheduled read date for the month.</p>	<p>AltaGas: AltaGas Utilities Inc. has no concerns with the proposed changes to section 5.1.4. However, AUI advises corresponding changes should also be applied to the AUC Tariff Billing Code Performance Monitoring Metrics Pseudocode to align with the revised Rule: http://www.auc.ab.ca/rule-development/tariff-billing-code/Documents/Performance_Monitoring_Metrics_Pseudocode/20070720_TBCPerformanceMonitoringMetrics_Pseudocode.pdf</p> <p>ATCO Electric: ATCO Electric has no comment.</p> <p>ATCO Gas: ATCO Gas has no issue with the proposed change.</p>	<p>The proposed wording around ineligible sites was intended to reflect changes to Rule 004 effective April 1, 2015, to which stakeholders agreed to during Rule 004 consultation.</p> <p>The Commission agrees with ATCO Electric’s and FortisAlberta’s comments to Section 4.1.4. The Commission will not include the proposed change in the final version of Rule 002.</p> <p>The Commission acknowledges that until such time that AUC Rule 004 can be revised, a discrepancy will exist between the currency calculation in AUC Rule 002 and the calculation in AUC Rule 004.</p>
5 Performance categories and standards for gas distributors	5.1.5 Tariff bill file completeness	<p><i>Method of calculation of performance:</i></p> <p>Percentage of sites expected to bill on each billing cycle that are billed and coded regular billing cycle on their scheduled tariff bill file publish date = [(number of sites assigned to billing cycles and transmitted in original tariff bill files on</p>	<p><i>Method of calculation of performance:</i></p> <p>Percentage of sites expected to bill on each billing cycle that are billed and coded regular billing cycle on their scheduled tariff bill file publish date = [(number of sites assigned to billing cycles and transmitted in original tariff bill files on</p>	<p>AltaGas: AltaGas Utilities Inc. has no concerns with the proposed changes to section 5.1.5. However, AUI advises corresponding changes should also be applied to the AUC Tariff Billing Code Performance Monitoring Metrics Pseudocode to align with the revised Rule: http://www.auc.ab.ca/rule-development/tariff-billing-code/Documents/Performance_Monitoring_Metrics_Pseudocode/20070720_TBCPerformanceMonitoringMetrics_Pseudocode.pdf</p>	<p>The AUC has determined that further consultation is required to clarify the definition and use of “ineligible sites” in this metric and did not include the proposed change in the final version of Rule 002.</p> <p>The Commission acknowledges that a</p>

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		<p>their scheduled tariff bill file publish date with a site production reason code of 2020) ÷ (total number of sites expected to bill for those billing cycles)] x 100</p>	<p>their scheduled tariff bill file publish date with a site production reason code of 2020) ÷ (total number of sites expected to bill for those billing cycles] ineligible sites)] x 100</p> <p>Where:</p> <p>Ineligible site = Site that was initially energized after its scheduled read date for the month.</p>	<p>development/tariff-billingcode/Documents/Performance_Monitoring_Metrics_Pseudocode/20070720_TB_CPerformanceMonitoringMetrics_Pseudocode.pdf</p> <p>ATCO Electric: ATCO Electric has no comment.</p> <p>ATCO Gas: ATCO Gas has no issue with the proposed change.</p>	<p>discrepancy will exist between the completeness calculation in AUC Rule 002 and the calculation in AUC Rule 004.</p>
<p>Appendix C – SAIFI and SAIDI service standards for owners of electric distribution systems subject to this rule</p>		<p><u>ATCO Electric Ltd.</u></p> <p>Maximum SAIFI excluding major events:</p> <p>2.69 or less</p> <p>Maximum SAIDI excluding major events:</p> <p>8.86 or less</p>	<p><u>ATCO Electric Ltd.</u></p> <p>Maximum SAIFI excluding major events:</p> <p>2.69 2.39 or less</p> <p>Maximum SAIDI excluding major events:</p> <p>8.86 8.12 or less</p>	<p>ATCO Electric: ATCO Electric has no concern with this proposed change.</p> <p>ATCO Gas: Not applicable.</p>	
<p>Appendix F – Alberta gas distributors’ emergency response service standards</p>		<p><u>AltaGas Utilities Inc.</u></p> <p>Emergencies responded to within specified time frame (calculated as an annual average of monthly results):</p> <p>(1) 65 per cent or greater of emergencies responded to within 60 minutes;</p>	<p><u>AltaGas Utilities Inc.</u></p> <p>Emergencies responded to within specified time frame (calculated as an annual average of monthly results):</p> <p>(1) 65 70 per cent or greater of emergencies responded to within 60 minutes;</p>	<p>AltaGas: Barring exceptional circumstances, AltaGas Utilities Inc. does not object to the proposed change. Specifically, given the disparate size of AUI’s service territory, it is conceivable instances will arise where emergency personnel will be physically unable to travel to an emergency site within the 60 minute time frame. Depending on the number of</p>	<p>The Commission considers that the revision to 70 per cent for AltaGas Utilities Inc. is reasonable given that this metric is calculated as an annual average of monthly results. As more years of data become available, the Commission can always re-examine the service standard for each company. Should levels</p>

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				<p>these and other emergencies in any given month, it is possible AUI may be unable to meet the revised target, despite all best efforts. Should such circumstances arise, AUI will provide details to the AUC as part of the quarterly reporting process.</p> <p>ATCO Electric: ATCO Electric has no comment.</p> <p>ATCO Gas: Not applicable.</p>	<p>trend downward, the Commission will review the facts and will assess what course of action (if any) is required to ensure no degradation of service occurs.</p>
<p>General comments:</p>	<p>City of Calgary:</p> <p>Calgary's lack of reply to any proposed revision is not to be taken as Calgary agreeing with or supporting the revision.</p> <p><u>Appendix G – Alberta gas distributors' call answering service standards</u></p> <p>ATCO Gas disclosed in Proceeding ID 240 that its own internal standards and minimum metric for call answering, as of 2010, is 70 percent answered within 20 seconds (70/20). See Exhibit 0063.01.AGN-240, CAL-AU-31 (a) Attachment 3, pdf 1154/1249.</p> <p>Further, the reporting indicates that the internal ATCO target metric is 80/20 and actual performance exceeded this standard in each month between January 2010 and October 2011.</p> <p>This period predates PBR, and the going-in rates of ATCO Gas for PBR purposes would have reflected these standards and performance.</p> <p>Accordingly, Customers should reasonably expect to see the standard of performance reflect ATCO's own internal standard, namely 80/20, since that is what they are paying for in rates.</p> <p>In its original comments and findings establishing Rule 002 under PBR for Appendix G standards, the Commission noted the following (from comment matrix Table "proposed Rule 002 changes for 2013" as posted on AUC website Pdf 74-5/78):</p> <p><i>"While the AUC does not want to see service levels decline in call answering performance, the difference between 80 per cent of calls answered in 20 seconds and 70 per cent answered in 30 seconds may be imperceptible to the average customer. However, while imperceptible to the average customer, the effort required by the company is greater and could lead to unintended consequences as pressure is put on the agents to finish all calls as quickly as possible to ensure all targets are met."</i></p>				

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					<p>Calgary respectfully submits that these findings are no longer relevant. Firstly, the facts have established that the ATCO Gas standard is 80/20, which means that call agents can and do operate under this standard, whether under pressure or not. Secondly, the call agents involved were not employees of ATCO Gas, they were employees of a service provider, and the Commission need not (and should not) be concerned with the performance of a service provider to a utility; it should only be concerned with the utility itself. Otherwise, the Commission is putting weight on irrelevant considerations in its decision.</p> <p>AUC response:</p> <p>This can be further discussed with stakeholders during the AUC Rule 002 Industry Consultation meetings to be held in 2016.</p>