

AUC Rule 021 and Rule 028 Industry Consultation Meeting Summary

Meeting date September 13, 2017 **Time** 10 a.m. to 1 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 and round table discussion

Name	Company
Carlo Gaerlan	AESO
Flora VanWageningen	AESO
Mike Choboter	AESO
Ron Smith	AESO
Anne Glass	Alberta Utility Billing Inc.
Veronica Mulvena	AltaGas Ltd.
Heather Hart	AltaGas Utilities Inc.
Linda Kinnee	AltaGas Utilities Inc.
Megan Villa	Ambit Energy
Daryl Pattison	ATCO Electric Ltd.
Enrique Nino	ATCO Electric Ltd.
Jacque Zabiran	ATCO Electric Ltd.
Michael MacKenzie	ATCO Electric Ltd.
Theresa Martin	ATCO Electric Ltd.
Jessica Laird	ATCO Energy
Robert Yeatheard	ATCO Gas
Theo Banick	ATCO Gas
Andrea Laroiya	AUC
Maria Baitoiu	AUC
Raymond Lee	AUC
Summer Abney	AUC

Name	Company
Brenda Bone	Battle River Power Coop
Clayton Northey	City of Fort Saskatchewan
Paula Robertson	City of Red Deer
Lori Harnack	Cognera
Natasia Wasson	Cognera
Paul Seely	Direct Energy
Stephen Cheung	Direct Energy
Helen McKinlay	ENMAX Customer Care
Paul Tung	ENMAX Power Corporation
Ray Poon	ENMAX Power Corporation
Sandra McCowan	ENMAX Power Corporation
Christine Harkness	EPCOR Distribution & Transmission Inc.
Hala El Saadi	EPCOR Distribution & Transmission Inc.
Yusra El Saadi	EPCOR Energy Alberta Inc.
Naomi Broni	EPCOR Energy Alberta Inc.
Ralph Steendam	EQUUS REA Ltd.
Brian Neufeld	FortisAlberta Inc.
Tina Dulguerov	FortisAlberta Inc.
Frances Murray	Just Energy
Sergio Guajardo	Rodan Energy
Megan Gill	Utilities Consumer Advocate
Joanne Mulders	Utility Network & Partners Inc.

2 AUC consultation survey, and contact list updates

- The AUC advised that there will be a survey sent out at the end of the industry consultation meeting, to ensure that the participants had a relevant, informative, and meaningful experience.
- The AUC advised that the rule industry consultation meeting distribution lists are in the process of being updated, and asked that everyone to provide the contact information for the individuals in their organization that wish to be informed on rule developments, and be invited to the various consultations.

ACTION: The AUC will send out a contact request form for industry participants to fill out with the correct contact information for each individual in their organization who wishes to be involved in the rule consultation process.

3 **Micro-Generation Working Group – Proposed changes to handle aggregated MG sites (AESO)**

- The AESO advised stakeholders that the proposed change table for Rule 021 includes proposed changes discussed within the working group. The group agreed to go over all changes when the meeting reached Item #5 on the agenda.

4 **Table A-21 Transaction timing table – AESO to provide update**

- Retailer responsibility to balance GCM data to the GRS data and ensure data accuracy as it relates to sections 4.6.4(1)(c)(iii) and 9.6.6.4 micro-generation retailer summary transactions (GRS) – process rules and content.
- The AESO presented the result of a survey that it had developed in order to assess the inconsistencies and misunderstandings around how retailers are managing their micro generation data, its accuracy, or lack thereof, and to also get an understanding on industry readiness for the predicted influx of micro-generation sites. For the survey results refer to the document entitled “AESO Micro-generation Retailer Survey Summary.”
- The survey findings suggested that parties would send Micro-generation retailer summary transaction (GRS) data monthly only if there is a credit on the account, although the rule specifies that it should be done monthly. The AESO noted that it expects to see accurate data being provided, and that it may implement more checks and balances to ensure accuracy of the data.
- The group wanted to clarify whose responsibility the Micro-generation cumulative meter consumption to retailer transaction (GCM) data validation was, the retailer or the MDM. It was clarified that the MDM should validate the data first but the retailer is also responsible to do the checks.
- One retailer asked if similar language to Daily cumulative meter consumption to retailers and LSA transaction (DCM) could be used for GCM rejections. The AESO stated that adding similar language could be a potential improvement to the rule that would also help retailers.
- The AESO noted that for the data validation and calculation for micro-generation sites, it is more concerned with the small micro-generation sites that rely on manual processes from retailers than on the larger or aggregated sites, as those are relying on interval meter data which does not require the same level of calculations.
- The AUC stated that it will be releasing the micro-generation (MG) guideline shortly and it will send a notice to distributors and retailers.

ACTION: The AUC to send a notice to distributors and retailers once the MG guideline is posted on the AUC's website.

- The stakeholders discussed the requirement in the regulation that the customer has to provide notice in writing to its service provider (retailer) that it intends to be a micro-generator. The stakeholders advised that they would like to have also the option to receive the notice by phone or other means than in writing. The AUC staff noted that in the MG guideline the reference is kept to general, and similar to the regulation, it is the customer responsibility to contact the retailer.
- Some stakeholders stated that a written letter could be beneficial in establishing the amount for the credit with the customer, especially for cases where the customer is not on the regulated rate. It was also suggested that the Micro-generation retailer notification transaction (GRN) does let the retailer know the site is a micro-generator.
- One distributor mentioned that it informs the customer upon approval of the application that the customer should talk with its retailer in order to receive the credit for the MG site.

ACTION: The AUC to follow up with retailers and provide the group with an update in regard with the notice in writing requirement.

5 Micro-Generation working group – update from AESO staff

- UCI working group – Update from the working group and proposed changes, if any.
- ATCO provided an update on the UCI working group progress. The group has discussed to repurpose fields that distributors do not use, to specify in the rule which field is required, optional or conditional, to have a consistent standard for mailing addresses and to specify what contact numbers should be included in the UCI. The group has not yet discussed about the Request off-cycle meter read completion transaction (ROC), but it would be discussed at the next meeting.
- ATCO advised that after the next meeting proposed for the end of October, the working group will present to the Rule 021 and Rule 028 group the finalized and agreed upon recommendations.
- In regard with the layout of the UCI transaction stakeholders noted that considering the cost between building a new transaction or having a transaction with most of the fields null would differ depending on the organization. These differences in cost might not lead to the cheapest overall solution. The AESO pointed out that, from an IT perspective, to reduce the number of fields that get sent out in a transaction might not be as complicated as to replace the entire transaction with one that has fewer fields. Parties should also consider and review this option when assessing their alternatives.

6 Draft proposed change table

- The draft proposed change table was provided to the group for discussion. During the meeting each proposed changes was discussed and agreed upon as follow:
- Section 1.1 Micro-Generation Definitions: Group, Parent and Child sites – All agree

- Section 2.13 Responsibilities: Wording change – All agree
- Section 2.15 Responsibilities: Provision of copies of transactions to the ISO, wording correction – All agree
- Section 4.6.4(1) (d): new section added for grouped micro-generation sites (see section 7.4) – All agree
- Section 7.4 (6) Enrolment Mechanics: Erroneous enrolment – All agree
The group agreed that similar change be made to Rule 028, Section 7.3 (7)
- Section 7.4(7) Grouped sites: New section
The group pointed out that the same rules of having the same retailer and being on the same feeder should be applicable for a new site added to an existing site grouping and that the customer has to follow the process to submit an application to the distributor for the addition of the new site.

ACTION: The AESO to draft language of new proposed Section 7.4(7), and provide the proposed changes for comment to the group.

- Section 7.8 Remove load limiter and disconnect power – All agree
As load limiting can be done either through a physical device or a computer program, the group agreed to the following wording:
(2) The WSP receives the DER from the retailer and **removes the load limiting** ~~dispatches a crew to remove the load limiting device or program~~ and cut power at the site.

ACTION: The AUC to change the wording in Section 7.8(2) to the following:

(2) The WSP receives the DER from the retailer and removes the loadlimiting and cut power at the site.

ACTION:The AUC to make the same consistent change where load limiting is mentioned.

- Section 7.10(3) Micro Generation grouping process, New section - All agree

- Section 9.4.6.14 Site ID Catalogue, Sequence 31: Cluster Correlation Key Field – All agree

The group agreed to change the proposed description of the field to the following wording:

Conditional field – Required if the site is part of Grouped Sites for micro-generation, otherwise, this field is optional.

Identifies the parent site ID of Grouped Sites. ~~that must be enrolled or de-enrolled jointly.~~

ACTION: The AUC to change the description for Sequence 31 of the Site ID Catalogue, Section 9.4.6.14 to the following:
Conditional field – Required if the site is part of Grouped Sites for micro-generation, otherwise, this field is optional.
 Identifies the parent site ID of a Grouped Sites.

- Section 9.4.6.14 Site ID Catalogue, Sequence 34: Micro-generator Indicator Field – All agree
- Section 9.6.5.2 Update site address transaction (USA), Sequence 29: Cluster Correlation Key Field – All agree

The group agreed to change the description of the Sequence 29 to the following wording:

Optional field – Populated at sender’s discretion.

Identifies the parent site id of a grouping of sites. ~~that must be enrolled or de-enrolled jointly.~~

ACTION: The AUC to change the description for Sequence 29 of the USA, Section 9.6.5.2 to the following:
Optional field – Populated at sender’s discretion. Identifies the parent site id of a grouping of sites.

- Appendix A Table A-5 LSA ID: Lethbridge LSA changes: All agree
- Appendix A Table A-6 Meter data manager (MDM) ID: Name Change – All agree

ACTION: The AUC to include GCM and GIM references in the table heading along with DCM and DIM references.
 The AUC to update all MDM ID with an expiry date and a new date for the new entities.
 The AUC to verify all LSA ID, MDM ID, WSP ID and update them if necessary.

- Appendix A Table A-9 Transaction status codes- WSP transaction status codes– All agree
- Update rule to reflect wire owner change for Crowsnest Pass with an expiry date of November 15, 2016 – All agree

ACTION: The AUC to expire the Crowsnest Pass ID with an expiry date of November 15, 2016.

7 Other Issues:

Site Slamming in the Market (ATCO Energy)

- ATCO Energy stated that it is keeping track of sites lost to another retailer and is calling those customers to find out more. ATCO Energy has been re-enrolling around 50 per cent of those customers but some are harder to contact. ATCO Energy asked the group if it kept track of any percentages of sites that get slammed in the industry and if the reason might be retailer related or timing issues with RRO de-enrollment process.
- ATCO Energy noted that the number presented are for both small commercial and residential for gas and electric sites.
- Some retailers stated that they do not have the resources to call all customers that they are losing, unless the sites are commercial. It was also noted that it could be a bad experience for customers that get to be moved from one retailer to another and some stakeholders were asking if there is a better way to address this issue.
- The AESO agreed to receive the list of sites and the date of the SRR transaction for the sites, from ATCO Energy and any other retailer which has sites lost and it will investigate to find if there is a specific reason for these occurrences.
- The natural gas distributors agreed to examine the list of sites from ATCO Energy and any other retailers that has a confirmed list of sites and to provide their findings to the AUC.

ACTION: For electric sites: Retailers to provide a list with the confirmed lost sites to the AESO at compliance@aeso.ca.

For natural gas sites: Retailer to provide a list to the corresponding distributor. The findings from the distributors will be forwarded to the AUC.

Erroneous Enrolment Issue - UCA

- The UCA has raised the issue of erroneous enrolment due to incorrect address information. It suggested that the retailers could ask for a site ID or a meter number in order to minimize the erroneous enrolment and that a possible rule change to verify customer address information could enhance the customer experience.

- The group discussed that most of the time the customer would not know the meter number or the site ID and the problem for retailers arises when for a legal land description there are multiple sites.
- One stakeholder suggested that additional information could be added to the SID transaction to include further detailed information on the addresses.

ACTION: The AUC to add this issue to Discussion Communities and inform the group in order to provide their comments.

Transparency of customer changes - FortisAlberta

- This final issue was not discussed at the meeting and the group agreed to have it posted in the Discussion Communities in order to provide their comments.

ACTION: The AUC to add this issue to Discussion Communities and inform the group in order to provide their comments.