

AUC Rule 003: Stakeholder comment table

[Stakeholders: Cognera Corp. (Cognera), Direct Energy, EPCOR Energy Alberta GP Inc. (“EEA”) and Encor by EPCOR (“Encor”) both entities referred to as (EPCOR), AltaGas Utilities Inc. (AUI), Alberta Utility Billing (AUB), FortisAlberta Inc. (FortisAlberta), North Parkland Power, ENMAX Energy Corporation (ENMAX), Alberta Co-operative Energy (ACE), Office of Utilities Customer Advocate (UCA), ATCO Energy Ltd. (ATCO Energy), Link Energy]

Note: To address stakeholder comments and concerns expressed at the consultation meeting of November 26, 2018, and subsequent written comments received by December 3, 2018, the AUC has made the following changes to Rule 003:

- The AUC changed the title to now read: Service Standards for Energy Service Providers.
- In addition, a definition of ESP has been added in Section 1.2 Definitions.
- For clarity the AUC has added Section 1.1 (2) to read: Section 3.4 of this rule applies to Energy Service Providers (ESP).
- The AUC moved definitions from the proposed Section 3.4.1 to a new Section 1.3.
- For clarity the AUC revised the definition of "incorrect customer bill" to read: means a bill issued to a customer that contains: (i) an error in the name or address of the customer, or in the items referred to in Section 4 of the *Billing Regulation*, 2003 for electricity services or in Section 9 of the *Default Gas Supply Regulation* for gas service; or (ii) a calculation error.
- AUC Response to AFREA: Only regulated service providers have to comply with Appendix A and B. No transition period will be provided for any energy service providers to comply with Section 3.4 of Rule 003.

Section	Subsection	Existing	Proposed changes (dated November 19, 2018)	Stakeholder comments on proposed changes	AUC response
Title		Service Quality and Reliability Performance Monitoring and Reporting for Regulated Rate Providers and Default Supply Providers	Service Quality and Reliability Performance Monitoring and Reporting for Regulated Rate Providers, and Default Supply Providers and Retailers	<p>AUI – proposes a change to add “Rural Electrification Association” and “Municipally Owned Utility” to the title to clarify all stakeholders to which the rule applies.</p> <p>FortisAlberta – If the intention is to continue with original plan of expanding coverage in section 3.4 to retailers, REAs, and municipally-owned utilities, the title of the section should reflect this.</p>	<p>AUC: The AUC changed the title to now read: Service Standards for Energy Service Providers</p> <p>AUC: In addition, a definition of ESP has been added in Section 1.2 Definitions.</p>
1. General provisions	1.1 Rule Application	The quality of services provided to customers by a default supply provider or a regulated rate provider are measured under this Rule 003. The quality of services provided by owners of electric distribution systems that are electric utilities, as defined in the Electric Utilities Act, and by gas distributors, as defined in the Gas Utilities Act, is measured under Rule 002: <i>Service Quality and Reliability Performance Monitoring and Reporting for Owners of</i>	The quality of services provided to customers by a default supply provider or a regulated rate provider are measured under this Rule 003. The quality of services provided by owners of electric distribution systems that are electric utilities, as defined in the Electric Utilities Act, and by gas distributors, as defined in the Gas Utilities Act, is measured under Rule 002: <i>Service Quality and Reliability Performance Monitoring and Reporting for Owners of Electric Distribution Systems and for Gas</i>	<p>AUI – proposes reference to new stakeholders be included in this section (for example, retailer, rural electrification association, and a municipally owned utility) for clarity.</p> <p>AUI proposes sections applicable to the various stakeholders be clearly identified at the beginning of the rule. For example, a retailer, rural electrification association, and municipally owned utility are subject to section 3.4 only, but regulated rate providers and default supply providers are subject to all sections of the rule.</p> <p>ENMAX – requests that the AUC confirm that retailers are exempt from quality service metrics under Rule 003 and that retailers are not required to file quarterly and annual reports.</p> <p>UCA - To provide clarity the UCA recommends adding wording at the beginning of the Rule that indicates which section(s) of Rule 003 are applicable to retailers, rural electrification associations and municipally owned utilities.</p>	<p>AUC: For clarity the AUC has added Section 1.1 (2) to read:</p> <p>(2) Section 3.4 of this rule applies to Energy Service Providers (ESP).</p> <p>AUC: In addition, a definition of ESP has been added in Section 1.2 Definitions.</p>

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		<i>Electric Distribution Systems and for Gas Distributors, even if those services are to the same sites or customers as those provided under this rule.</i>	<i>Distributors, even if that those services are is to the same sites or customers as those provided under this rule.</i>		
1. General provisions	1.2 Definitions	(a) “business day” has the meaning ascribed to the term “business day” as defined in the ISO Rules and as shown on the Stakeholder Calendar posted on the ISO’s website;	(a) “business day” has the meaning ascribed to the term “business day” as defined in the ISO Rules and as shown on the Stakeholder Calendar posted on the ISO’s website; A business day means any day other than Saturday, Sunday or a statutory holiday as defined in the Interpretation Act;	<p>EPCOR - EPCOR wants to clarify how the Commission will handle statutory holiday’s in lieu. In the Interpretation Act, the language does not describe how those days are defined and/or handled, aside from December 26.</p> <p>AUI – has no concerns with this proposed change. However, AUI requests the Commission apply approved changes to this definition to the definition of “business day” in Rule 002.</p> <p>ENMAX – requests that the AUC clarify if the Interpretation Act referred to is the provincial or federal legislation.</p> <p>ENMAX suggests that the AUC use different acronyms when referring to “RSP” outside section 3.4. “RSP” now has more than one meaning in Rule 003.</p>	<p>AUC – The AUC has changed the definition of “business day” as written in Rule 021 and Rule 028, to read:</p> <p>“business day”</p> <p>A business day means any day other than Saturday, Sunday or a statutory holiday in Alberta, except for Easter Monday.</p>
1. General provisions	1.2 Definitions	<p>(g) “Rule 003” means this Rule 003: Service Quality and Reliability Performance Monitoring and Reporting for Regulated Rate and Default Supply Providers;</p> <p>(h) “Rule 003 annual report” means the reporting of service quality and reliability performance, as detailed in this Rule 003, prepared and submitted annually in accordance with Section 2.2;</p> <p>(i) “Rule 003 quarterly report” means the reporting of service quality and reliability performance metrics, as detailed in this Rule 003, prepared and submitted quarterly in</p>	<p>(g) “Rule 003” means this Rule 003: Service Quality and Reliability Performance Monitoring and Reporting for Regulated Rate and Default Supply Providers; “retailer” has the meaning ascribed to the term in the Electric Utilities Act and the Gas Utilities Act;</p> <p>(h) “Rule 003 annual report” means the reporting of service quality and reliability performance, as detailed in this Rule 003, prepared and submitted annually in accordance with Section 2.2; “Rule 003” means this Rule 003: Service Quality and Reliability Performance Monitoring and Reporting for Regulated Rate and Default</p>	<p>AUI – For section 1.2(h), AUI proposes the definition match the title of the rule for consistency, including proposed changes to the Title noted above. For example, Retailers is added to the title, but excluded from the definition.</p> <p>AUI proposes definitions be added for all new stakeholders. The proposed changes have added definitions for (g) “retailer” and (k) “rural electrification association”. AUI proposes “municipally owned utility” be added for clarity and completeness.</p> <p>FortisAlberta - (h) should align to title, please see comments in respect of “Title”, above.</p> <p>Municipally owned needs to be defined</p> <p>ENMAX - (g) It is not clear to ENMAX why the AUC has elected to include the retailer in this Rule. ENMAX requests that the AUC provides their rationale for this inclusion.</p> <p>UCA - notes that there are two different definitions of RSP within Rule 003, Section 1.2 (e) and Section 3.4 (g). The UCA is concerned that this may lead to confusion and could result in misinterpretation of the Rule. The UCA recommends using two distinct terms to describe which group of participants the section applies to.</p> <p>As the AUC is proposing to change the name of Rule 003 to Service Quality and Reliability Performance Monitoring and Reporting for Regulated Rate Providers, Default Supply Providers and Retailers 1.2 (h) should be amended to reflect the new name.</p>	<p>AUC – The definitions in Rule 003 have been rearranged to ensure they are in alphabetical order.</p> <p>The AUC added a new definition as follows:</p> <p>“ESP”</p> <p>(d) “ESP” means an RSP, a retailer, a rural electrification association, and a municipally-owned electric utility</p> <p>AUC: The AUC added to the proposed definition of “retailer” as follows:</p> <p>(h) “retailer” has the meaning ascribed to the term in the <i>Electric Utilities Act</i> and the <i>Gas Utilities Act</i> but in this rule applies to retailers that serve customers who consume less than 250,000 kilowatt-hours (kWh) or and 2,500 gigajoules (GJ) annually.</p> <p>AUC: The <i>Electric Utilities Act</i> and the <i>Gas Utilities Act</i> allows the AUC to make service standards for all retailers.</p>

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		<p>accordance with Section 2.1; and</p> <p>(j) "TBF" means tariff bill file as defined in Rule 004: Alberta Tariff Billing Code</p>	<p>Supply Providers;</p> <p>(i) "Rule 003 quarterly report" means the reporting of service quality and reliability performance metrics, as detailed in this Rule 003, prepared and submitted quarterly in accordance with Section 2.1; and "Rule 003 annual report" means the reporting of service quality and reliability performance, as detailed in this Rule 003, prepared and submitted annually in accordance with Section 2.2;</p> <p>(j) "TBF" means tariff bill file as defined in Rule 004: Alberta Tariff Billing Code "Rule 003 quarterly report" means the reporting of service quality and reliability performance metrics, as detailed in this Rule 003, prepared and submitted quarterly in accordance with Section 2.1; and</p> <p>(k) "rural electrification association" has the meaning ascribed to the term in the Electric Utilities Act,</p> <p>(l) "site" has the meaning given to it in Rule 021: Settlement System Code Rules and in Rule 028: Natural Gas Settlement System Code Rules, and</p> <p>(m) "TBF" means tariff bill file as defined in Rule 004: Alberta Tariff Billing Code.</p>	<p>ATCO Energy – changing the definition of an RSP halfway through a document for one section is confusing and does not make it clear that this document applies to all "Retailers" when reviewing the definitions section in 1.2. Recommend providing the missing clarity at the beginning of this document. And creating a new 'name' for Competitive Retailers for the sections of this rule that apply.</p>	<p>Retailers were added to Rule 003 to ensure that their customers receive the same billing services as those provided to customers of regulated service providers. There should be no differentiation between the level of billing services for regulated and competitive customers (e.g., customers should not receive inaccurate bills).</p> <p>AUC: The AUC amended the existing definition as follows:</p> <p>(m) "TBF" means tariff bill file within the meaning of Rule 004: <i>Alberta Tariff Billing Code Rules</i>.</p> <p>AUC: In response to stakeholder comments, the AUC moved definitions from the proposed Section 3.4.1 to a new Section 1.3 Application of Section 3.4, which will now read:</p> <p>For purposes of Section 3.4 of this rule,</p> <p>(a) "customer" includes a member receiving electricity services from a rural electrification association;</p> <p>(b) "customer bill" means an invoice issued to a customer;</p> <p>(c) "incorrect customer bill" means a bill issued to a customer that contains:</p> <p>(i) an error in the name or address of the customer, or in the items referred to in Section 4 of the <i>Billing Regulation, 2003</i> for electricity services or in Section 9 of the <i>Default Gas Supply Regulation</i> for gas service; or</p> <p>(ii) a calculation error;</p> <p>(d) "late customer bill" means a bill issued to a customer in excess of 90 days from the day the ESP received the tariff charge for the customer's site displayed on the bill and the</p>

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					<p>ESP had a record of the customer's information for billing purposes at the time the tariff charges were received;</p> <p>(e) "tariff charge" has the meaning given to it in Rule 004: <i>Alberta Tariff Billing Code Rules</i>; and</p> <p>(f) "unexpected customer bill" means a bill issued by an ESP to a person who is not a customer of the ESP, or is a customer of the ESP but is not the person financially responsible for the bill.</p>
<p>3 Performance categories and standards</p>	<p>3.2.1 Sites overdue for billing</p>	<p>The RSP shall report the number and percentage of sites with outstanding TBF charges and the number of kilowatt hours (kWhs) or gigajoules (GJs) outstanding. When there are multiple months of outstanding TBF charges for the same site, the RSP shall count the site only once in the metric and report how long it has been since the oldest outstanding TBF charges were received relative to the end of the quarter.</p> <p>For the number of kWhs or GJs, the RSP shall track and report each month's outstanding TBF charges separately and independently from the sites.</p> <p>For example, if an RSP last billed a site on December 31, 2009 but has since received TBF charges on January 20, February 20 and March 20, 2010, for 1,000 kWhs each</p>	<p>The RSP shall report the number and percentage of sites with outstanding TBF charges and the number of kilowatt hours (kWhs) or gigajoules (GJs) outstanding. When there are multiple months of outstanding TBF charges for the same site, the RSP shall count the site only once in the metric and report how long it has been since the oldest outstanding TBF charges were received relative to the end of the quarter.</p> <p>For the number of kWhs or GJs, the RSP shall track and report each month's outstanding TBF charges separately and independently from the sites.</p> <p>For example, if an RSP last billed a site on December 31, 2009, but has since received TBF charges on January 20, February 20 and March 20, 2010, for 1,000 kWhs each month, and the RSP is preparing the Rule 003 quarterly report for the quarter ending March 31, 2010, the outstanding TBF charges are those received</p>	<p>ENMAX - suggests that the AUC use different acronyms when referring to "RSP" outside section 3.4. "RSP" now has more than one meaning in Rule 003.</p> <p>UCA – submits there should be additional changes to subsection 2.1 and 2.2 to provide additional information that must be reported by a RSP, including information on customer complaints and compliance with the Code of Conduct Regulation:</p> <ul style="list-style-type: none"> • <u>Include information regarding complaint handling and remedial actions taken.</u> • <u>Number of customer accounts, opening and closing accounts.</u> • <u>Disconnection for non-payment</u> • <u>Accounts in arrears.</u> • <u>Write offs and reports to credit record agencies.</u> • <u>System upgrades or changes.</u> 	<p>AUC – Please see final Section 3.2.1.</p> <p>This change is to align the rule with template reporting which no longer requires reporting of volumes.</p> <p>A definition of ESP has been added in Section 1.2 Definitions.</p> <p>The AUC will consider stakeholder suggestions in future reviews of Rule 003.</p>

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		<p>month, and the RSP is preparing the Rule 003 quarterly report for the quarter ending March 31, 2010, the outstanding TBF charges are those received January 20 and February 20, but not March 20 (as the charges received March 20 were received less than a month before the end of the quarter). The site will be counted as overdue for billing since the oldest outstanding TBF charges were received (January 20), a gap of more than two months but less than three prior to March 31. The kWhs, however, will be reported as 1,000 kWh for each of two months.</p> <p>In addition, the RSP shall separate each of the metrics (site count and the kWhs or GJs) into the following two categories:</p> <p>(a) Sites and kWhs or GJs where the RSP has a customer to bill (customer information available); or</p> <p>(b) Sites and kWhs or GJs where the RSP does not have customer information in order to bill (customer information not available).</p>	<p>January 20 and February 20, but not March 20 (as the charges received March 20 were received less than a month before the end of the quarter). The site will be counted as overdue for billing since the oldest outstanding TBF charges were received (January 20), a gap of more than two months but less than three prior to March 31. The kWhs, however, will be reported as 1,000 kWhs for each of two months.</p> <p>In addition, the RSP shall separate each of the metrics (site count and the kWhs or GJs) into the following two categories:</p> <p>(a) Sites and kWhs or GJs where the RSP has a customer to bill (customer information available); or</p> <p>(b) Sites and kWhs or GJs where the RSP does not have customer information in order to bill (customer information not available).</p>		
<p>3 Performance categories and standards</p>	<p>3.3.1 Percentage of customer satisfaction following</p>	<p>For this measure, the RSP must report the level of customer satisfaction using the results from its internal customer satisfaction survey</p>	<p>For this measure, the RSP must report the level of customer satisfaction using the results from its internal customer satisfaction survey process or using the</p>	<p>AUI – proposes to replace 'online' with the following change to recognize the commonly used survey instruments to allow for sufficient flexibility to obtain customer feedback:</p> <p>The survey instrument can be a telephone, written, or electronic online questionnaire...</p>	<p>AUC – The AUC has changed “can” found in the draft to “may” be a telephone or online questionnaire.</p> <p>The AUC will consider stakeholder suggestions in future reviews of Rule 003.</p>

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	<p>customer-initiated contact with the RSP (Rule 003 annual report only)</p>	<p>process or using the results from the survey process of an independent third-party agency. Whether the RSP conducts surveys on an ongoing basis throughout the year or it conducts the survey on an annual basis, the RSP shall report the results as part of the Rule 003 annual report. The RSP must use the sampling methodology described in Appendix A. The survey instrument must be a telephone questionnaire using survey questions also listed in Appendix A, as well as any additional questions that the RSP may add.</p>	<p>results from the survey process of an independent third-party agency. Whether the RSP conducts surveys on an ongoing basis throughout the year or it conducts the survey on an annual basis, the RSP shall report the results as part of the Rule 003 annual report. The RSP must use the sampling methodology described in Appendix A. The survey instrument must can be a telephone or online questionnaire using survey questions also listed in Appendix A, as well as any additional questions that the RSP may add.</p>	<p>AUI's customers demographics proactively responds to written (paper) questionnaires, and any appropriate survey instrument that customers are willing to respond to should be considered acceptable sources for obtaining and evaluating customer satisfaction.</p> <p>AUI proposes 'online' be replaced with 'electronic' to encompass all forms of electronic communication including online, which will continue to allow for flexibility.</p> <p>AUI also requests the Commission consider applying the approved changes to this section of Rule 003 to the corresponding section of Rule 002.</p> <p>ENMAX – proposes the following revisions to this subsection”</p> <p>“The survey instrument may include a telephone or online questionnaire...” In addition, ENMAX requests the survey instruments to be general and to include a variety of mediums, so that the rule remains relevant as the technology changes.</p> <p>UCA – supports the proposed change/addition to incorporate the ability to conduct the survey instrument using an online questionnaire. This change recognizes and reflects consumer preferences to use existing and newer technologies to complete the survey.</p> <p>The UCA recommends adding a new subsection(s) to Section 3 to include:</p> <ul style="list-style-type: none"> • <u>Performance standard for the number of bills issued that contain inaccurate charges.</u> • <u>Performance standard for ensuring accurate and timely customer information is transferred between the regulated provider and the distribution company.</u> <p>The UCA recommends adding a subsection to section 3.3 – <u>“Customer satisfaction measures”</u> which includes information that must be reported by the RSP regarding the number and type of complaints:</p> <ul style="list-style-type: none"> • <u>Report the total number of inquiries received from customers.</u> • <u>Bill issuance and payment.</u> • <u>Billing adjustments.</u> • <u>Arrear payment agreements.</u> • <u>Complaints regarding unauthorized switching.</u> • <u>Complaints regarding information sharing.</u> • <u>Complaints regarding unfair business practices.</u> • <u>Complaints regarding security deposits.</u> • <u>Complaints regarding service guarantee errors and credits awarded.</u> 	

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				<p>The UCA recommends Change Appendix A - “Customer-initiated contact satisfaction survey” and Appendix B - “Overall satisfaction survey”, to add questions to the surveys on the following matters:</p> <p><u>Whether the customer agrees or disagrees with the statement:</u></p> <p><u>a. The RSP adequately handled a complaint.</u></p> <p><u>b. The RSP solved the complaint in a timely manner.</u></p> <p><u>c. The RSP provided the customer timely information regarding the complaint.</u></p> <p><u>d. The RSP offered voluntary credits or rebates related to the complaint.</u></p>	
3 Performance categories and standards	3.3.2 Overall customer satisfaction measures (Rule 003 annual report only)	The RSP (or third-party agent) must use the sampling methodology described in Appendix B. The survey instrument must be a telephone questionnaire using survey questions also listed in Appendix B, as well as any additional questions that the RSP may add.	The RSP (or third-party agent) must use the sampling methodology described in Appendix B. The survey instrument must can be a telephone or online questionnaire using survey questions also listed in Appendix B, as well as any additional questions that the RSP may add.	<p>EPCOR – From the ‘2018-11-19-Rule003-Blackline’ document, EPCOR has identified that Section 3.3.2 Overall customer satisfaction measures (Rule 003 annual report only) has some proposed changes that were not presented in the 2018-11-19-Rule003 PropsedChanges’ document. EPCOR has no comments on the proposed changes to Section 3.3.2.</p> <p>AUI - Please refer to AUI’s comments above for section 3.3.1.</p> <p>FortisAlberta - Blackline and table are currently not consistent and should be aligned.</p> <p>ENMAX – proposes the following revisions to this subsection: “The survey instrument may include a telephone or online...”</p> <p>UCA – supports the proposed change/addition to incorporate the ability to conduct the survey instrument using an online questionnaire. This change recognizes and reflects consumer preferences to use existing and newer technologies to complete the survey.</p>	AUC – Please see response above in Section 3.3.1.
3 Performance categories and standards	3.3.3 Complaint Response	The RSP shall track and report customer-specific issues brought forward to the RSP by the Commission (complaints), whether written or verbal, and report the number of days required to close each complaint. Once a complaint has been initiated, it cannot be reported closed until all of the following conditions have been met: (1) The RSP has provided to the Commission any information requested by the	The RSP shall track and report customer-specific issues brought forward to the RSP by the Commission (complaints), whether written or verbal, and report the number of days required to close each complaint. Once a complaint has been initiated, it cannot be reported closed until all of the following conditions have been met: 1. The RSP has provided to the Commission any information requested by the Commission regarding the complaint;	EPCOR – From the ‘2018-11-19-Rule003-Blackline’ document, EPCOR has identified that Section 3.3.3 Complaint Response has some proposed changes that were not presented in the 2018-11-19-Rule003-PropsedChanges’ document. EPCOR has no comments on the proposed changes to Section 3.3.3.	AUC: Please see final version of Rule 003.

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		<p>Commission regarding the complaint;</p> <p>(2) The Commission has not indicated that the complaint must remain open until the Commission is able to contact the customer; and</p> <p>(3) If corrections to the customer's account are required, the RSP has either identified to the Commission when the customer can expect to see those corrections or the RSP has provided details regarding steps that will be taken to correct the account. The RSP must close complaints according to the following standards:</p> <p>(1) 80 per cent of the complaints directed to the RSP in any given month must be closed within 14 calendar days of receipt of the complaint; and</p> <p>(2) 100 per cent of the complaints directed to the RSP in any given month must be closed within 30 calendar days of receipt of the complaint.</p>	<p>2. The Commission has not indicated that the complaint must remain open until the Commission is able to contact the customer; and</p> <p>3. If corrections to the customer's account are required, the RSP has either identified to the Commission when the customer can expect to see those corrections or the RSP has provided details regarding steps that will be taken to correct the account.</p> <p>The RSP must close complaints according to the following standards:</p> <p>(1) 80Eighty per cent of the complaints directed to the RSP in any given month must be closed within 14 calendar days of receipt of the complaint; and</p> <p>(2) 100One hundred per cent of the complaints directed to the RSP in any given month must be closed within 30 calendar days of receipt of the complaint.</p>		
<p>3 Performance categories and standards</p>	<p>3.4 Service guarantee</p>	<p>(1) The RSP must provide a credit of \$75 to any customer who is subject to one of the following errors made by the RSP:</p> <p>(a) Customer was provided written notice of pending disconnection of service in error;</p> <p>(b) Customer was provided written notice of pending</p>	<p>3.4 Billing Services</p> <p>3.4.1 Definitions</p> <p>For the purposes of this section,</p> <p>(a) "customer" includes a member receiving electricity services from a rural electrification association;</p> <p>(b) "customer bill" means an invoice issued to a customer;</p>	<p>Cognera – Can clarification be added that this is the only section that pertains to retailers?</p> <p>Review RSP definition as per discussion in meeting should not be defined in 2 different ways in the same document.</p> <p>Can additional clarity be provided as to what an Inaccurate billing information is?</p> <p>Clarification on 3.4.2.5 – is this just for the regulated rate as section (i) it is referring to the RSP.</p> <p>Direct Energy – c) "incorrect customer bill" should be clearly defined</p>	<p>AUC: In response to stakeholder comments, the AUC has revised draft Section 3.4.1 Definitions as follows:</p> <p>3.4.1 Billing Requirements</p> <p>(1) For the purposes of this section, the "permissible disconnection period" means a disconnection that occurs:</p> <p>(a) during the period between April 16 to October 14 of any year for electricity</p>

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		<p>referral to a credit agency in error;</p> <p>(c) Customer was referred to a credit agency in error; or</p> <p>(d) Customer experienced disconnection of service in error.</p> <p>(2) Payment of the \$75 credit is not required where no error has been made by the RSP, and in particular is not required in the following circumstances:</p> <p>(a) The RSP's written notice of pending disconnection [or pending referral to a credit agency] was not issued in error, and such notice and the customer's payment crossed in the mail.</p> <p>(b) The RSP's written notice of pending disconnection [or pending referral to a credit agency] was not issued in error, and such notice was in mail transit at the time the customer made or attempted to make payment by visiting the premises of an authorized payment acceptance establishment, such as a bank, trust company or credit union.</p> <p>(c) The electric or gas distributor disconnected a customer in error, rather than as instructed by the RSP.</p> <p>(d) The RSP's written notice of pending disconnection [or pending referral to a credit agency] was not issued in</p>	<p>(c) "incorrect customer bill" means a bill issued to a customer that contains</p> <p>(i) Inaccurate billing information.</p> <p>(ii) Calculation errors;</p> <p>(d) "late customer bill" means a bill issued to a customer in excess of 90 days from the day the RSP received the tariff charge for the customer's site displayed on the bill and the RSP had a record of the customer's information for billing purposes at the time the tariff charges were received;</p> <p>(e) "tariff charge" has the meaning given to it in Rule 004: Alberta Tariff Billing Code Rules;</p> <p>(f) "unexpected customer bill" means a bill issued by an RSP to a person who is not a customer of the RSP, or is a customer of the RSP but not the person financially responsible for the bill; and</p> <p>(g) "RSP" includes a retailer, a rural electrification association and a municipally owned utility.</p> <p>3.4.2 Billing requirements</p> <p>3.4.2.1 An RSP must not issue the following:</p> <p>(a) An incorrect customer bill.</p> <p>(b) A late customer bill.</p>	<p>(i) "Inaccurate billing information" means an incorrect rate or line item, but does not include a misspelled name or incorrect address, nor does it include any errors that stem from an incorrect tariff charge from a distributor;</p> <p>(ii) "Calculation errors" means an incorrect line item resulting from inaccurate information, and does not mean a cancel/rebill that results from a corrected tariff charge from a distributor;</p> <p>d) late customer bill 90 days should only start once the customer is identified by the RSP</p> <p>(d) "late customer bill" means a bill issued to a customer in excess of 90 days from the day the RSP received the tariff charge for the customer's site displayed on the bill and the RSP had a record of the customer's information for billing purposes at the time the tariff charges were received, starting from the day that the customer is identified by the RSP;</p> <p>(f) "unexpected customer bill" should be clearly defined</p> <p>f) "unexpected customer bill" means a bill issued by an RSP to a person who is not a customer of the RSP, or is a customer of the RSP but not the person financially responsible for the bill, but is not an RSP error if land titles has provided inaccurate information or the RSP is following its vacant property process;</p> <p>g) RSP definition should be expanded to exclude retailers to customers over the threshold.</p> <p>(g) "RSP" includes a retailer, a rural electrification association and a municipally owned utility, but does not include retailers that serve customers above the "customer" thresholds as defined in the Energy Marketing and Residential Heat Sub-Metering Regulation.</p> <p>3.4.2.1 "An RSP must not issue the following" should be rephrased to allow 30 days for correction by the RSP</p> <p>3.4.2.1 "An RSP must determine a course of correction of the following errors within 30 days from the date that the RSP became aware of the billing error:"</p> <p>Information for billing purposes is referenced in 3.4.2.2 (e) billing information means something different than calculation errors or line items.</p> <p>3.4.2.2 Expand the disconnect circumstances to include additional eligible reasons for valid disconnections and fix the title to indicate that a RSP cannot disconnect a customer directly. Some of these errors do not lend themselves to full corrections within 30 days. DE would notify the customer and identify the resolution to the customer.</p> <p>3.4.2.2 An RSP must not request that the distributor disconnect a customer unless:</p> <p>(g) The customer refuses to provide a security deposit to the RSP.</p> <p>(h) Service is discontinued under the distributors' Terms and Conditions.</p> <p>3.4.3 Should indicate that the reporting is quarterly and annually – does this apply to retailers, REAs and municipalities as well or do they only report when \$150 credit has been paid?</p> <p>From the industry consultation meeting on November 26, 2018, EPCOR understands that the intent of section 3.4 Billing Services is to outline high impact billing errors. EPCOR proposes language changes to clarify the meaning of the definitions in section 3.4.1 Definitions, (c), (d), (f), and (g):</p> <p>(c) "incorrect customer bill" means a bill issued to a customer that contains</p> <p>(i) Inaccurate billing information,</p>	<p>services, or April 15 to October 31 of any year for gas services, and</p> <p>(b) when the temperature will be above 0 degrees Celsius in the 24-hour period after the proposed disconnection;</p> <p>(2) An ESP must not issue</p> <p>(a) an incorrect customer bill;</p> <p>(b) a late customer bill;</p> <p>(c) an unexpected customer bill; or</p> <p>(d) more than one customer bill in a calendar month unless it has a reasonable explanation for issuing multiple bills.</p> <p>(3) An ESP must not request the disconnection of a customer unless</p> <p>(a) the customer requests the disconnection;</p> <p>(b) the customer's account is in arrears and the disconnection will occur within the permissible disconnection period;</p> <p>(c) the customer is receiving electricity or gas service but fails to provide information or provides incorrect information for billing purposes and the disconnection will occur within the permissible disconnection period; or</p> <p>(d) the premises or property served by a site reasonably appears to be vacant or unoccupied.</p> <p>(4) An ESP must not refer a customer to a credit agency unless the customer's account is in arrears.</p> <p>(5) An ESP must not provide written notice of</p> <p>(a) A pending disconnection except for the reasons set out in sections 3.4.1(3) (b) to (d).</p>

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		<p>error, and such notice was properly mailed, but the customer did not pick up the mail from locations such as a post office, super mail box, or home mail box.</p> <p>(e) The RSP's written notice of pending disconnection [or pending referral to a credit agency] was not issued in error, and such notice was undelivered by the mail delivery service.</p> <p>(f) The customer attempted to make payment to the person dispatched by the electric or gas distributor to disconnect the service, where such disconnection was not made in error, but that person was not authorized to accept payment.</p> <p>The requirement for the RSP to provide a \$75 credit to any customer who is subject to one of the errors made by the RSP cited in (1) above must be stated in any terms and conditions filed by the RSP with the Commission, along with the exceptions noted in (2) above.</p> <p>The RSP must track and report all instances when a customer was eligible for the \$75 credit as a result of the RSP's error.</p>	<p>(c) An unexpected customer bill.</p> <p>(d) More than one customer bill in a calendar month unless it has a reasonable explanation for issuing multiple bills.</p> <p>3.4.2.2 An RSP must not disconnect a customer unless:</p> <p>(a) The customer requests the disconnection.</p> <p>(b) The customer's account is in arrears.</p> <p>(c) The disconnection is for safety purposes or to avoid damage to the electric system or gas system in accordance with the terms and condition of service approved by the Commission.</p> <p>(d) The customer has tampered with a meter or other facility that may affect metering at the site or has by theft or fraud received electricity service or gas service.</p> <p>(e) The customer is receiving electricity or gas service but fails to provide information or provides incorrect information for billing purposes in accordance with the terms and conditions of service approved by the Commission.</p> <p>(f) The premises or property served by a site reasonably</p>	<p>(iii) (i) <u>calculation errors;</u> (ii) <u>customer billing with incorrect pricing (the incorrect RSP's Regulated Rate Tariff or contract pricing);</u> (d) "late customer bill" means a bill issued to a customer in excess of 90 days from the day the RSP received the tariff charge for the customer's site displayed on the bill and the RSP had a record of the customer's information for billing purposes at the time the tariff charges were received. <u>Exceptions to this may be listed in an RSP's Non-Energy application.</u> (f) "unexpected customer bill" means a bill issued by an RSP to a person who is not an ineligible-a customer of the RSP <u>as defined by the RSP's Terms and Conditions.</u> , or is a customer of the RSP but not the person financially responsible for the bill. (g) "RSP" includes a <u>regulated rate provider, default provider,</u> retailer, a rural electrification association and a municipally owned utility.</p> <p>EPCOR – understands that the AUCs intent was to outline reasonable reasons for disconnects. The current proposed wording limits EPCOR's existing ability to disconnect and poses risk to the RSP and the WSP/ DSO. EPCOR proposes the following language change to (c), (g), (h) and (i) in section 3.4.2.2 An RSP must not disconnect a customer unless: (c) The disconnection is, <u>in the reasonable opinion of the RSP,</u> for safety purposes or to avoid damage to the electric system or gas system in accordance with the terms and condition of service approved by the Commission. (g) <u>Requested by the DSO/ WSP.</u> (h) <u>A customer violates a provision of the RSPs Terms and Conditions.</u> (i) <u>The Customer has become a credit risk and the RSP has a reasonable explanation for disconnection.</u></p> <p>During the consultation meeting the AUC indicated the reasons for disconnects in the RSP's existing Terms and Conditions were non-specific. EPCOR has reviewed its existing Terms and Conditions, which were approved by the AUC on October 4, 2018, and believes that the existing reasons for disconnects are critical for business operations. Although some of these disconnect reasons may seem non-specific, listing every disconnect scenario would make the list unnecessarily extensive. In section 3.4.2.5 (3), EPCOR understands that the AUC is directing regulated rate providers to include sections 3.4.2.2 to 3.4.2.4 into their Terms and Conditions. EPCOR would like to propose that the regulated rate provider not include sections 3.4.2.2 to 3.4.2.4 in their Terms and Conditions as the current proposed language limits EPCOR's ability to disconnect customers. EPCOR would like to continue current disconnection practices as outlined in the Regulated Rate Tariff ("RRT") Terms and Conditions.</p> <p>AUI – provides the following comments: For subsection (a), the definition of "customer" is unclear. The proposed definition suggests it is an expansion of an existing definition. However, "customer" is not otherwise defined in the rule. Therefore, the definition can be read to exclude customers of regulated rate providers, default supply providers, retailers, and municipally owned utilities.</p>	<p>(b) A pending referral to a credit agency unless the customer's account is in arrears.</p> <p>AUC: The AUC revised Section 3.4.2 Service guarantees to read:</p> <p>(1) If the ESP contravenes sections 3.4.1(3) to 3.4.1(5), the ESP must provide a credit of \$150 to the affected customer.</p> <p>(2) A regulated rate provider or default supply provider shall not include for recovery in a regulated rate tariff application or a default rate tariff application, service guarantee credits of \$150 paid to customers under this section.</p> <p>(3) Until the regulated rate provider or default supply provider applies to the Commission to change its terms and conditions of service to incorporate substantively sections 3.4.1(3) to 3.4.1(5), these sections are deemed to be included in its terms and conditions of service as of January 1, 2019.</p> <p>AUC: The AUC has also added Section 5(3) in Rule 032 to read:</p> <p>When a service guarantee has been paid to a customer in accordance with Rule 003, the Commission will reduce the specified penalty by that amount.</p> <p>AUC: The AUC added to proposed Section 3.4.3 Reporting requirements for ESP</p> <p>(1) An ESP must track and report to the Commission, on a quarterly basis and annually, all instances in which a customer received the \$150 credit in accordance with Section 3.4.2.</p>

Section	Subsection	Existing	Proposed changes (dated November 19, 2018)	Stakeholder comments on proposed changes	AUC response
			<p>appears to be vacant or unoccupied.</p> <p>3.4.2.3 An RSP must not refer a customer to a credit agency unless</p> <p>The customer's account is in arrears.</p> <p>3.4.2.4 An RSP must not provide written notice of</p> <p>(a) A pending disconnection except for the reasons set out in Section 3.4.2.2 (b) to (f).</p> <p>(b) A pending referral to a credit agency unless the customer's account is in arrears.</p> <p>3.4.2.5 Service guarantee</p> <p>(1) If the RSP contravenes sections 3.4.2.2 to 3.4.2.4, the RSP must provide a credit of \$150 to the affected customer.</p> <p>(2) A regulated rate provider or default supply provider shall not include for recovery in a regulated rate tariff application or a default rate tariff application, service guarantee credits of \$150 paid to customers under this Section.</p> <p>(3) The regulated rate provider or default supply provider must include sections 3.4.2.2 to 3.4.2.4 in its terms and conditions.</p>	<p>AUI proposes the definition be revised as follows:</p> <p>(a) <u>"customer"</u></p> <p>(i) <u>In respect of the electricity market means a customer as defined in the Electric Utilities Act,</u></p> <p>(ii) <u>In respect of the natural gas market means a customer as defined in the Gas Utilities Act,</u></p> <p>(iii) <u>Includes a member receiving electricity services from a rural electrifications association,</u></p> <p>(iv) <u>Includes a consumer who purchases gas or electricity from a retailer, and</u></p> <p>(v) <u>Includes a consumer who receives gas or electricity service from a municipally owned utility.</u></p> <p>AUI also proposes that the definition of "customer" may be more appropriately placed in subsection 1.2 of the rule as it is applicable to all stakeholders.</p> <p>For subsection (g), AUI is not in favour of having multiple definitions for RSP (i.e. sections 1.2 and 3.4.1). Two definitions for the same acronym will cause confusion when interpreting and applying the requirements of the rule. AUI proposes the definition for 'RSP' be removed from section 3.4.1, and the RSP definition in section 1.2(e) be revised to:</p> <p><u>"RSP" means a regulated rate provider or default supply provider; and for purposes of section 3.4 will include retailer, rural electrification association, and municipally owned utility."</u></p> <p>Proposed section 3.4.2.1 - AUI is not in favour of the change unless amendments are made to address the concerns below:</p> <ul style="list-style-type: none"> The definitions of "incorrect customer bill", a "late customer bill" and an "unexpected bill" be amended to address circumstances where the inaccuracy, delay or unexpected receipt of the bill is the result of circumstances beyond the control of the RSP or the result of another party's actions (e.g. customer has provided inaccurate information). The RSP should not be subject to a financial penalty when it has made reasonable or best efforts to resolve a matter in a timely manner (e.g. 30 days remedy period). Refer to AUI comments for proposed section 3.4.2.5 below. <p>In light of the existing draft of Rule 032, AUI suggests that these changes are appropriate to explicitly preserve the AUC's discretion to evaluate the circumstances that gave rise to the problematic billing.</p> <p>Alternatively, AUI proposes the following changes:</p> <p>3.4.2.1 An RSP must <u>make a reasonable effort to</u> not issue the following: ...</p> <p>Or</p>	<p>(2) Reporting periods shall be calendar quarters, with the quarterly reports submitted to the Commission by the last day of the month following the end of each quarter: April 30 is the deadline for the first quarter report, July 31 is the deadline for the second quarter report, October 31 for the third quarter report and January 31 for the fourth quarter report.</p> <p>(3) The annual report shall be submitted to the Commission no later than the last day of February following the end of the calendar year.</p> <p>AUC: The Commission has considered stakeholder concerns and has added Section 4 to Rule 032 which sets out the factors to be considered on whether to issue a notice of specified penalty. In addition, the Commission has also changed the rolling period for contraventions from a 12-month rolling period to a 120-day rolling period and has adjusted the number of contraventions within each penalty column.</p> <p>AUC: The Terms and Conditions of Service of the Energy Service Providers define customer and the relationship between the ESP and the customer. AUC Rule 003 will govern certain billing and customer care aspects of that relationship. The term customer is also defined in the <i>Electric Utilities Act</i> and the <i>Gas Utilities Act</i> therefore there is no need to include a definition.</p>

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			<p>3.4.3 Reporting requirements</p> <p>The RSP must track and report to the Commission all instances when a customer received the \$150 credit because of the RSP's error.</p>	<p>3.4.2.1 An RSP must not issue the following:</p> <ul style="list-style-type: none"> (a) An incorrect customer bill <u>unless it has a reasonable explanation and is addressed in a timely manner.</u> (b) A late customer bill <u>unless it has a reasonable explanation and is addressed in a timely manner.</u> (c) An unexpected bill <u>unless it has a reasonable explanation and is addressed in a timely manner.</u> (d) More than one customer bill in a calendar month unless it has a reasonable explanation for issuing multiple bills. <p>In the alternative to the above, changes could be made to Rule 32 to allow for consideration of such mitigating factors.</p> <p>Proposed section 3.4.2.2 – AUI provides the following comments:</p> <ul style="list-style-type: none"> • In order to maintain the AUC's discretion in respect of determining circumstances for which disconnection is appropriate, AUI suggests adding a provision (g) to section 3.4.2.2 as follows: <u>(g) Or for any other reason permitted under the RSP's AUC approved terms and conditions of service.</u> • Given the prescriptive and stringent nature of the winter moratorium period for gas distribution utilities, AUI proposes the following AUC-approved provision be added: <u>Except in the case of an emergency or when it would be hazardous to continue delivering gas to the service site, service to residential sites, including multifamily dwellings, cannot be disconnected for any reason during the period April 15 to October 31 when the overnight temperature is forecast to drop below zero (0) degrees Celsius in the 24 hour period immediately following the proposed disconnect in the area of the service site, except upon receipt of a written request from the property owner. [Decision 2011-319]</u> <p>Proposed section 3.4.2.5 (3) - AUI is not in favour of the proposed change to reproduce sections 3.4.2.2 to 3.4.2.4 in its terms and conditions of service (T&Cs) exactly as written in the rule.</p> <ul style="list-style-type: none"> • AUI's T&Cs are approved as a plain language document to make it easier for customers to understand. The proposed wording will significantly alter and be inconsistent with the overall tone of AUI's T&Cs. For example, the AUI T&Cs do not refer to "the customer"; they refer to "you" (instead of "the customer"). • In light of the above, AUI reviewed its current approved T&Cs and identified the permissible reasons to disconnect a customer listed in section 3.4.2.2 (a) through (f) of this rule are already addressed in sections 9.2 - 9.6, 9.7 - 9.9, and 9.17 of its approved Natural Gas Utility Service Rules (NGUSR). 	<p>AUC: The terms and conditions of service referred to in this Section 3.4.2(3) apply to regulated service providers (regulated retailers).</p>

Section	Subsection	Existing	Proposed changes (dated November 19, 2018)	Stakeholder comments on proposed changes	AUC response
				<ul style="list-style-type: none"> AUI determined the requirements of section 3.4.2.2 of this rule are aligned with its approved NGUSR (a separate document part of AUI's collective T&Cs), although not written exactly as proposed in the rule. AUI requests to retain the tone and language in its existing NGUSR, as approved by the Commission, and not be required to reproduce this section exactly as proposed. AUI determined the requirements of sections 3.4.2.3 through 3.4.2.5 of this rule are aligned with its approved Special Charges Schedule (SCS) (a separate document part of AUI's collective T&Cs). However, the provisions are not written exactly as proposed in this rule. AUI requests to retain the tone and language in its existing SCS, as previously approved by the Commission, and not be required to reproduce this section exactly as proposed. However, AUI will update its SCS to reflect the change in the customer credit amount from \$75 - \$150 because of the RSP's error. In view of the above comments, AUI proposes the following change to section 3.4.2.5(3): <u>The regulated rate provider or default supply provider must include or align sections 3.4.2.2 to 3.4.2.4 in its terms and conditions of service.</u> <p>Proposed section 3.4.2.5 - Given the link between Rule 003 and Rule 032, AUI is of the view that there should be acknowledgement of reasonable efforts to resolve a matter arising from sections 3.4.2.1 to 3.4.2.4 such that the error does not crystallize into a contravention if appropriate steps are taken. There would still be pecuniary consequences for the RSP as the RSP must still provide the \$150 credit to the customer. AUI proposes a new <u>subsection (4)</u> be added to subsection (3) as follows:</p> <p><u>(4) Where a reasonable effort has been made to resolve a non-compliance with sections 3.4.2.1 to 3.4.2.4 within 30 days, the non-compliance is not considered a contravention of this rule.</u></p> <p>In the alternative, changes could be made to Rule 32 to allow for consideration of such mitigating factors.</p> <p><u>AUB - (c) "incorrect customer bill" should read: means a bill or group of bills issued to customers that contain inaccurate billing information or calculation errors and all of the following apply:</u></p> <p><u>(i) The errors negatively impact the customer</u></p> <p><u>(ii) The errors have not been resolved within 30 days of being identified by the customer, the RSP, the AUC or the UCA</u></p> <p><u>(iii) the error was not outside the control of the RSP</u></p> <p>Add the following definition:</p> <p><u>(h) "resolved" – means a plan to make corrections to a customer's bill has been formulated whereby the plan would satisfy the requirements of the customer, the AUC or the UCA.</u></p>	<p>AUC: Please see revised Section 3.4.2(3) in Rule 003.</p>

Section	Subsection	Existing	Proposed changes (dated November 19, 2018)	Stakeholder comments on proposed changes	AUC response
				<p>3.4.2.1 – remove (d). There are many circumstances where an RSP must provide more than one bill to a customer in a single calendar month (e.g., cycle changes for sites, final bills, bills produced in response to a customer request, etc.)</p> <p>FortisAlberta – 3.4.1 FortisAlberta suggests that the current escalation process where the customer first contacts the retailer and the two parties work to resolve the issue, followed by the customer contacting the UCA if the issue remains unresolved to the customer’s satisfaction, and finally the customer contacts the AUC (if the matter still remains unresolved to the customer’s satisfaction) should be adopted as part of Rule 003 and Rule 032 to provide an additional degree of procedural awareness and ensure adequate time for investigation and resolution.</p> <p>FortisAlberta is concerned that ‘Inaccurate billing information’ and ‘Calculation errors’ are not sufficiently defined given the potential severity of the prescribed penalties.</p> <p>Definition or examples should be provided for clarity for all stakeholders and for effective and efficient understanding and adherence to the rule, thus achieving the overall goal of an enhanced customer experience.</p> <p>3.4.2.1 (d) please provide clarity on ‘reasonable explanation’. Would these be billing events in Rule 004 Tariff Bill Code?</p> <p>3.4.2.2 FortisAlberta suggests that this title should be amended to reflect the fact that RSPs issue deenergize requests, but do not perform the actual disconnect. For example, “An RSP must not send a deenergize request to a Wire Service Provider unless...”</p> <p>North Parkland Power - (c) “incorrect customer bill” should read: means a <u>bill or group of bills issued to customers that contain inaccurate billing information or calculation errors and all of the following apply:</u></p> <p><u>(i) The errors negatively impact the customer</u></p> <p><u>(ii) The errors have not been resolved within 30 days of being identified by the customer, the RSP, the AUC or the UCA</u></p> <p><u>(iii) the error was not outside the control of the RSP</u></p> <p>Add the following definition:</p> <p><u>(h) “resolved” – means a plan to make corrections to a customer’s bill has been formulated whereby the plan would satisfy the requirements of the customer, the AUC or the UCA.</u></p> <p>3.4.2.1 – remove (d). There are many circumstances where an RSP must provide more than one bill to a customer in a single calendar month (e.g., cycle changes for sites, final bills, bills produced in response to a customer request, etc.)</p>	

Section	Subsection	Existing	Proposed changes (dated November 19, 2018)	Stakeholder comments on proposed changes	AUC response
				<p>ENMAX – requests that the AUC consider a threshold for errors based on a percentage of book instead of a zero percent threshold for errors. Perfect billing services for all customers leaves every retailer in a vulnerable position for specified penalties. ENMAX recommends a 30-calendar day period to resolve a customer’s billing error. (Please see below)</p> <p>3.4.1 c) – ENMAX requests further clarification of ‘who’ is responsible due to errors from land title searches, and cross metering. ENMAX is specifically concerned about instances where the billing information is incorrectly provided to the RSP. In addition, please clarify the AUC’s view on whether the DFO, customer or the RSP is responsible for the error.</p> <p>3.4.1.c) i) ENMAX requests clarification on what the term “inaccurate billing information” is intended to encompass. Specifically, would an estimated bill be considered inaccurate? Examples such as estimated bills or cancel/rebill invoices could occur due to estimates. Disconnection in error could also occur due to cross metering. ENMAX requests a list of “exemptions from a penalty” added to the Rule that include instances where the retailer is not at fault.</p> <p>3.4.1 d) – ENMAX proposes the clause should specify that these are calendar days (i.e. ...in excess of 90 calendar days...)</p> <p>3.4.1 f) – ENMAX is unable to confirm who is financially responsible for the bill and therefore suggests the following revisions:</p> <p>Replace “or is a customer of the RSP but not the person financially responsible for the bill...” with: “unexpected bill means issuing a bill to a person who is not a customer on the account.” If there are multiple account holders, it will be difficult for the retailer to determine who is financially responsible for the bill.</p> <p>3.4.1.g – ENMAX does not support retailers being included as part of Rule 003. Historically, SQRPs concerns only for regulated entities. ENMAX understands that as customers have the choice to drop a retailer if they are not satisfied with the service, Rule 003 should not be applicable.</p> <p>3.4.2.1.a – Please confirm if the intent of the changes to Rule 003 is to require that ENMAX produces bills that are 100% correct? It is ENMAX’s view that is not a reasonable threshold; therefore, ENMAX recommends that a 95-98% target along with a 30-day period to resolve anything “inaccurate/incorrect” without a penalty should be included in this Rule.</p> <p>3.4.2.1.c – Please include a definition of “unexpected customer bill”? Is it the AUC’s view that closing out a budget billing amount, or an invoice for a land title search be considered be an unexpected bill?</p> <p>3.4.2.1 d) –ENMAX does not support the inclusion of this clause. The requirement of the bill cycle and cancel/rebills can cause more than one bill in the calendar month. Therefore, ENMAX recommends deleting this clause or providing a list of exceptions to this clause.</p>	

Section	Subsection	Existing	Proposed changes (dated November 19, 2018)	Stakeholder comments on proposed changes	AUC response
				<p>3.4.2.5 (3) – ENMAX notes that the T&C’s for the RRO and the retailer will need to be updated to reflect this change.</p> <p>3.4.3 – ENMAX request that the AUC provide additional clarity on what errors to report. A non-inclusive list of examples would be helpful.</p> <p>ENMAX requests that Rule 003 include the provision of a 30-calendar day period to resolve a customer billing error from the time the error is discovered by ENMAX or from the time the billing error is brought to ENMAX’s attention. This would be that it is not contravention of Rule 003 if a resolution is agreed upon between ENMAX and the customer within a 30- calendar day period.</p> <p>ACE - (c) “incorrect customer bill” should read: means a bill <u>or group of bills</u> issued to customers that contain <u>inaccurate billing information or calculation errors and all of the following apply:</u></p> <p><u>(i) The errors negatively impact the customer</u></p> <p><u>(ii) The errors have not been resolved within 30 days of being identified by the customer, the RSP, the AUC or the UCA</u></p> <p><u>(iii) the error was not outside the control of the RSP</u></p> <p>Add the following definition:</p> <p><u>(h) “resolved” – means a plan to make corrections to a customer’s bill has been formulated whereby the plan would satisfy the requirements of the customer, the AUC or the UCA.</u></p> <p>3.4.2.1 – remove (d). There are many circumstances where an RSP must provide more than one bill to a customer in a single calendar month (e.g., cycle changes for sites, final bills, bills produced in response to a customer request, etc.)</p> <p>UCA - As the proposed amendments to Rule 003 will be applied to competitive retailers, rural electrification association and municipally owned utilities for the first time the UCA submits that the impacted parties should be clearly identified at the start of this Rule and in this Billing Services Section 3.4.</p> <p>With respect to 3.4.1 (c) the AUC should specifically identify what constitutes inaccurate billing information or calculation errors.</p> <p>The UCA is concerned that a customer bill is not considered late until it is in excess of 90 days from the day the RSP received the tariff charge and had a record of the customer’s information for billing purposes. The UCA suggests that the number of days should be decreased to 60 days as 90 days could impact the ability of a consumer to pay the late bill and subsequent bills that will accrue during the period.</p>	

Section	Subsection	Existing	Proposed changes (dated November 19, 2018)	Stakeholder comments on proposed changes	AUC response
				<p>Section 3.4.2.2 (b) should require a minimum length of time the customer must be in arrears for prior to initiating a disconnect order. Additionally, a financial arrears threshold should be reached prior to initiating a disconnection order?</p> <p>Section 3.4.2.3 should require a minimum length of time that the customer must be in arrears for prior to referring the customer to a credit agency.</p> <p>Additionally, a financial arrears threshold should be reached prior to referral to a credit agency.</p> <p>Section 3.4.2.4 (a) should require a minimum length of time that the customer must be in arrears for prior to providing written notice of a pending disconnection or referring a customer to a credit agency.</p> <p>Section 3.4.2.5 –The UCA supports increasing the amount of service guarantee payable to a consumer to \$150 in the event of an erroneous: (i) customer disconnection; (ii) referral to a credit agency; (iii) written notice of a pending disconnection; or (iv) pending referral to a credit agency.</p> <p>Section 3.4.2.5 (1) should state: <u>If the RSP contravenes sections 3.4.2.1 to 3.4.2.4, the RSP must provide a credit of \$150 to the affected customer.</u> The UCA submits that the Service guarantee Section 3.4.2.5 should be expanded to include instances of <u>inaccurate billing, billing calculation errors, “late customer bills”, “unexpected customer bills” and repetitive billing errors of the same nature especially where the same customer is impacted.</u> The Service guarantees should be required if the underlying issue and error is not rectified by the RSP within 30 days from identifying or being notified of the error.</p> <p>The UCA recommends the changes to better reflect the impact on consumers from service failings, and to provide added incentive to RSP providers to fix customer service and billing issues in a timely manner. The UCA recommends adding a requirement <u>to provide a credit of \$150 for each 30 day period where the RSP was overdue in providing a bill to a customer.</u> For clarity, each 30 day period would commence only after the bill was considered to be a “late customer bill”. Add a credit of \$150 for every time the RSP does not return a phone call within 1 business day. Add a credit of \$150 for erroneous enrollment. Add a credit of \$150 for a bill issued to a customer that contains inaccurate charges or calculation errors. Add a credit of \$150 for failure to meet timelines to answer billing inquiries.</p> <p>ATCO Energy – changing the definition of an RSP halfway through a document for one section is confusing and does not make it clear that this document applies to all “Retailers” when reviewing the definitions section in 1.2. Recommend providing the missing clarity at the beginning of this document. And creating a new ‘name’ for Competitive Retailers for the sections of this rule that apply.</p> <p>Detail is required with examples to help all understand what is meant by inaccurate billing information.</p> <p>For section 3.4.2.1, definitions with examples are needed to provide clarity on a, b, c, d.</p>	

Section	Subsection	Existing	Proposed changes (dated November 19, 2018)	Stakeholder comments on proposed changes	AUC response
				<p>3.4.3 - No reporting requirements are outlined in this section. Because this is the only section that applies to Competitive Retailers, more clarity is required here as to the expectations/requirements.</p> <p>Link Energy – (c) “incorrect customer bill” should read: means a bill <u>or group of bills</u> issued to customers that contain inaccurate billing information or calculation errors <u>and all of the following apply:</u></p> <p><u>(i) The errors negatively impact the customer</u></p> <p><u>(ii) The errors have not been resolved within 30 days of being identified by the customer, the RSP, the AUC or the UCA</u></p> <p><u>(iii) the error was not outside the control of the RSP</u></p> <p>Add the following definition:</p> <p><u>(h) “resolved” – means a plan to make corrections to a customer’s bill has been formulated whereby the plan would satisfy the requirements of the customer, the AUC or the UCA.</u></p> <p>3.4.2.1 – remove (d). There are many circumstances where an RSP must provide more than one bill to a customer in a single calendar month (e.g., cycle changes for sites, final bills, bills produced in response to a customer request, etc.)</p>	

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AFREA additional comments			
Current Rule Location	Current Rule Wording	Suggested Amendment	Reasons
Appendix A	...The study must achieve a minimum sample of 400 completed questionnaires each year.	...The study must achieve a minimum sample of 400 <u>or 1% of membership if the RSP is a rural electrification association.</u>	According to AFREA data, there are approximately 15 REAs that have less than 400 members. It is thus impossible for those REAs to be compliant with a “400” minimum sample size. AFREA understands that the intention is to ensure a minimum sample size for accuracy of data. The “400” limit in a large investor-owned company is less than 1% of customer base. Thus the AFREA suggests that a sample size of 1% is a reasonable alternative for REAs.

Section	Subsection	Existing	Proposed changes (dated November 19, 2018)	Stakeholder comments on proposed changes	AUC response
Appendix A		...Finally, through a survey question, any customer who has been employed by the RSP within the past two years or whose household contains someone who has been employed by the RSP within the past two years shall not be included in the survey.	...Finally...the past two years shall not be included in the survey. <u>This does not apply to members of a rural electrification association (REA) who has served in a volunteer capacity for the REA as either an administrator or as an elected representative to the Board of Directors.</u>	Most REAs rely upon their membership to do the work of the REA. Without this work, the cooperative business model and the principles under which the REA is legislated fails. Some REAs acknowledge that their volunteers take time away from their employment or businesses to do this work and provide small honourariums. The AFREA respectfully suggests that if the intention of the survey is to capture an accurate sense of member satisfaction, receiving information from current or past Board Members or other REA volunteers would unduly limit the ability to receive survey data in smaller REAs, especially those smaller than 400 members.	
Appendix B		...The study must achieve a minimum sample of 400 completed questionnaires each year.	...The study must achieve a minimum sample of 400 <u>or 1% of membership if the RSP is a rural electrification association.</u>	According to AFREA data, there are approximately 15 REAs that have less than 400 members. It is thus impossible for those REAs to be compliant with a “400” minimum sample size. AFREA understands that the intention is to ensure a minimum sample size for accuracy of data. The “400” limit in a large investor-owned company is less than 1% of customer base. Thus the AFREA suggests that a sample size of 1% is a reasonable alternative for REAs.	
Appendix B		...Finally, through a survey question, any customer who has been employed by the RSP within the past two years or whose household contains someone who has been employed by the RSP within the past two years shall not be included in the survey.	...Finally...the past two years shall not be included in the survey. <u>This does not apply to members of a rural electrification association (REA) who has served in a volunteer capacity for the REA as either an administrator or as an elected representative to the Board of Directors.</u>	Most REAs rely upon their membership to do the work of the REA. Without this work, the cooperative business model and the principles under which the REA is legislated fails. Some REAs acknowledge that their volunteers take time away from their employment or businesses to do this work and provide small honourariums. The AFREA respectfully suggests that if the intention of the survey is to capture an accurate sense of member satisfaction, receiving information from current or past Board Members or other REA volunteers would unduly limit the ability to receive survey data in smaller REAs, especially those smaller than 400 members.	
1.1.1	NONE		<u>A transition period of twelve (12) months is provided under this rule to rural electrification associations (REAs). On or before the end of the transition period, the REA must inform the AUC if a contractor or other entity will provide data on behalf of the REA. Any changes to the representation of an REA must be reported to the AUC within sixty (60) days or the change.</u>	REAs are governed under the Rural Utilities Act (RUA), as well as the EUA and the changes made to filing requirements following Bill 13. Under the RUA, changes in governance require special motion or approval at an AGM. For those REAs that choose to implement Rule 003 under self-governance and self-operation, governance models and administrative duties may need to change. For those REAs that contract their billing through an RRO contract, there will need to be contractual revisions to ensure that a) the parties have a meeting of the minds to have the contractor conduct Rule 003 compliance on behalf of the REA, and b) that the liability of any non-compliance is resolved. AFREA respectfully requests a transition time to allow for changes in governance and contract negotiations to occur, and proper approval made at an AGM or by special resolution in accordance with the REA bylaws and the RUA and its regulations.	