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Canada



January 16, 2006

Alberta Energy and Utilities Board
640 5th Avenue SW
Calgary, AB T2P 3G4

Attention: Mr. Fino Tiberi
Senior Research and Policy Analyst

Dear Mr. Tiberi:

Re: Directive 012
Tariff Billing Code
EPCOR Distribution Inc. Compliance Plan

Please find enclosed for filing with the Board EPCOR Distribution Inc.'s (EDI's) Compliance Plan under the Tariff Billing Code (Code). EDI respectfully requests that the Board approve the Compliance Plan pursuant to section 6.6.1 of the Code.

EDI will achieve compliance with the requirements of the Tariff Bill Code by completing the development, testing, and implementation of what is essentially a new and more efficient computer billing system.

Following the Board's direction, EDI will implement version 1.2 of the Tariff Bill Code on July 1, 2006. This implementation date aligns with the Board's market integration test plan, which allows for an extended and more efficient test period for the market as a whole (including all retailers and wire owners).

Though EDI fully supports the extended testing window, the new billing system is still on target to be ready for implementation by the original Code effective date of February 1, 2006. As such, EDI realizes that there is a period of time where additional system testing can be performed in order to provide greater detail and supporting test data for the market. During this time, core members of the system test team will remain on staff in order to provide ad hoc support to the market as testing continues as well as performing additional testing for a successful implementation.

EDI has discussed the idea of performing additional testing with retailers in the market and has received support for this approach. Specifically, in the period between February 1, 2006 and

July 1, 2006, EDI will perform full-scale market operations testing of the system while releasing the test results to the market. This test data will allow retailers, at their own discretion, to evaluate EDI's results at live production volumes, and will provide additional quality assurance across the complete billing cycle.

EDI's tariff billing systems handle electric energy transactions with a market value in excess of half a billion dollars per annum. Given the magnitude of these dollars, EDI considers it entirely reasonable to continue this coordinated market testing plan through 2006, to ensure the accuracy and timeliness of billing and invoicing. This comprehensive testing, the costs of which are estimated at \$ 0.9 million, will allow time for quality assurance of both EDI's tariff billing to retailers, and retailers' billing to end use customers. EDI expects to propose the recovery of these costs through its Tariff Billing Code Implementation Deferral Account in its 2007+ DT Application.

Please contact me directly if you have any questions with respect to EDI's Compliance Plan.

Yours truly,

original signed by Rick Cowburn

Rick Cowburn
Vice President, Tariff Services, EPCOR Distribution Inc.

RC/sf
enclosure

ALBERTA ENERGY AND UTILITIES BOARD

**DIRECTIVE 012
ALBERTA TARIFF BILLING CODE**

**COMPLIANCE PLAN Update
OF
EPCOR DISTRIBUTION INC.**

January 16, 2006

EPCOR Distribution Inc. (EDI) has prepared this update to its Compliance Plan for filing with the Alberta Energy and Utilities Board (Board) in accordance with the requirements of Directive 012 – the Alberta Tariff Billing Code, Version 1.2 dated September 6, 2005 (the Tariff Billing Code). This update contains information pertaining to specific details of EDI’s implementation of the Directive as it will stand on July 1, 2006.

Pursuant to section 6.1.1(a) of the Tariff Billing Code, EDI confirms the following:

- (i) EDI will perform the role of the Wire Owner with respect to the Tariff Billing Code.
- (ii) EDI is aware of, and understands, its obligations under the Tariff Billing Code.
- (iii) EDI intends to comply with the specific obligations defined in section 2.0 of the Tariff Billing Code and the process and transactional requirements defined in sections 3.0, 4.0 and 5.0 of the Tariff Billing Code, with the exception of the following functionality that will be missing in the initial release:
 - Section B.5.10 Cancel Reason Codes. Implementing the reason codes associated with cancellation has proved complex to implement and demanding on system processing time. EDI will be partially unable to comply with section B.5.10 in its July 1, 2006 release and will use 3030 as default value to capture the intent of all of codes 3030, 3040, 3050 and 3060. EDI will consider implementing this functionality in a subsequent release.
 - Section 4.3.6 Demand Determinant Content. Under Production Rule 6 of Section 4.3.6, all relevant demand determinants in the derivation of billing demand must be disclosed. These demand determinants are included for retailers’ informational purposes. For the July 1, 2006 release, EDI will not be including rate minimum demand determinants. These values are included in EDI’s rates schedules, as filed with the Board, and are therefore available to

any retailer wanting to know the rate minimum demand. EDI will consider implementing this functionality in a subsequent release

EDI will provide the Board with a written review of the ongoing relevance and necessity of these two exceptions prior to December 31, 2006.

- (iv) EDI will comply with coordinated industry test scheduling as directed by the Board.
- (v) The name, address, phone number and email address of the senior authority accountable for EDI's compliance with the Tariff Billing Code are as follows:

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