

Section	Sub-Section	Metric	Stakeholder Comments	AUC Responses
1. Definitions			<p><u>UCA:</u></p> <ul style="list-style-type: none"> Agree with all definitions. 	
			<p><u>EPCOR Energy Alberta Inc. (EEAI):</u></p> <ul style="list-style-type: none"> Add a definition for business days based on the SSC definition to clarify the business day requirements for reporting. 	Agreed. The AUC will use the definition for business day from AUC Rule 021.
			<p><u>ENMAX Energy Corporation (EEC):</u></p> <ul style="list-style-type: none"> Inconsistent use of capitalization (e.g. definitions of Default Supply Provider, Regulated Rate Provider). 	AUC Rule 002 generally follows the format used by other acts and regulations in Alberta which is to capitalize definitions only when they are acronyms and proper names (such as Commission). In our list of definitions, “default supply provider” is not capitalized because it is not a proper name of a particular default supply provider.
			<p><u>AltaGas Utilities Inc. (AUI):</u></p> <ul style="list-style-type: none"> Definitions: “TBF” should be defined as the tariff bill file. Application: A brief narrative explaining the purpose and application of Rule 003, perhaps as a separate “Application” section, may be helpful to more fully understand the Rule; especially to persons previously unfamiliar with Rule 003. 	Agreed. The AUC will add a definition for TBF and a paragraph explaining the application of Rule 003.
2. Measurement and Reporting Protocol	2.1 Quarterly Report		<p><u>UCA:</u></p> <ul style="list-style-type: none"> Agree with all timeframes outlined in this section. A suggestion from the UCA would be to print actual dates reports are required by. Example: April 30, July 31, Oct 31 and Jan 31. 	Agreed. The AUC will add the dates for clarity.

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2. Measurement and Reporting Protocol (cont'd)	2.1 Quarterly Report		<p><u>ENMAX Energy Corporation (EEC):</u></p> <ul style="list-style-type: none"> Is quarterly reporting too frequent? 	<p>The AUC has evaluated the frequency of reporting and is satisfied that quarterly and annual reporting continues to be the proper frequency.</p>
	2.2 Annual Report		<p><u>UCA:</u></p> <ul style="list-style-type: none"> Agree with the timeframes of the Annual Report however item (5) does not make reference to the expectation of time the RSP should notify the Commission of any change to their internal reporting methods that may impact the ability to comply with Rule 003. (Immediately?) 	<p>Agreed. The AUC will add wording to indicate that the provider must notify the AUC as soon as they are aware of the change.</p>
			<p><u>DIRECT ENERGY REGULATED SERVICES (DERS):</u></p> <ul style="list-style-type: none"> 2.2 (3) & 2.2 (4): DERS is supportive of a quantitative approach, however qualitative statements or plans can not be compared or consistent across RSPs as they are not objective in nature. However, DERS is supportive of transparency and consistent quantitative comparisons across all RSPs. 	<p>The majority of the quantitative metrics are intended to allow a consistent metric for comparing the RSP's performance to historical performance. In some cases, they also allow comparison across RSPs. The AUC realizes that with some of the metrics comparing one RSP to another is not reasonable, so in those cases the AUC uses the data purely for comparing the RSP to itself in the past.</p> <p>Qualitative information provided in the annual report, on the other hand, will not be used for comparison purposes. This information is intended to give the RSP the opportunity to communicate to the AUC in a way that numbers alone do not allow.</p>
			<p><u>ENMAX Energy Corporation (EEC):</u></p> <ul style="list-style-type: none"> 2.2 (4): Implies a performance penalty. Need clarification. 	<p>This subsection was intended to clarify section 2(8) in the previous version of this rule. It provides that if the AUC is satisfied that exceptional circumstances existed, the AUC may waive any applicable performance standard. Owners are expected to meet the performance standards defined in this rule and are expected to demonstrate to the AUC that</p>

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2. Measurement and Reporting Protocol (cont'd)	2.2 Annual Report			their failure to meet any standard was warranted given the circumstances. Failure to do so would mean the owner is non-compliant with the rule and penalties may be administered in accordance with applicable legislation.	
			<p><u>AltaGas Utilities Inc. (AUI):</u></p> <ul style="list-style-type: none"> Changes in methods or procedures: Section 2.2(5) appears to have application to both Annual and Quarterly Reports. Therefore, AUI recommends the wording from Section 2.2(5) be moved under Section 2 and before Section 2.1. 	Agreed. The AUC will move that subsection into the introduction to Section 2.	
	2.3 Annual Meeting			<p><u>UCA:</u></p> <ul style="list-style-type: none"> It would seem that to make the Annual Meeting productive that it be scheduled after the Annual results are in from the RSP and Default Supplier 	Agreed. The AUC will insert a phrase clarifying that point.
				<p><u>DIRECT ENERGY REGULATED SERVICES (DERS):</u></p> <ul style="list-style-type: none"> 2.3 (1): DERS is in support of an annual meeting with the AUC to discuss the common metrics that are being reported by all RSPs. This meeting should be to address validity of data reported and any required changes to reporting going forward. 	Agreed.
				<p><u>AltaGas Utilities Inc. (AUI):</u></p> <ul style="list-style-type: none"> Annual owner-initiated meetings: While AUI appreciates the value in meeting to discuss issues with the Commission; annual meetings on this particular issue may not be warranted. Rather than an annual meeting initiated by the owner, AUI suggests it be open to either the owner or AUC to initiate meetings in the event concerns arise. This would present a more efficient and timely opportunity for either party to advise of, and address, matters of concern. 	The AUC sees value in annual meetings, even if they are brief. The AUC will change the wording to “After submission of the annual report to the AUC, the RSP and the AUC will meet at least once annually...” This wording will allow either party to initiate the meeting, and the discussion about whether or not to meet face-to-face can constitute a meeting.

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2. Measurement and Reporting Protocol (cont'd)	2.4 Templates for Quarterly and Annual Reports		<p>UCA:</p> <ul style="list-style-type: none"> Templates are easy to understand and clear. Will these templates be posted and if so how soon after they are filed with the Commission. On the AUC website? 	The AUC may publish extracts from the templates on its website or the templates themselves. This is a detail that will be finalized during implementation. Timing of publishing the data will also be determined during implementation.
	2.5 Backups and Missing Data		<p>UCA:</p> <ul style="list-style-type: none"> Agree with backup of data and availability for no less than 24 months. However is there an “end” timeframe for back up data? 	The “end” timeframe is not defined in this rule. In some cases, other regulations may dictate the length of storage. The AUC is only concerned in this rule that the data be available for at least two years.
3. Performance Categories and Standards	3.1		<p>UCA:</p> <ul style="list-style-type: none"> Agree with Call Answer Service Level of 70/30 and Abandon Rate of less than 5%. 	
			<p>EPCOR Energy Alberta Inc. (EEAI):</p> <ul style="list-style-type: none"> 3.1.1 & 3.1.2: These reports are different from EEAI’s current interpretation of the Rule 003 code. As such, we will need to create new reports to track these requirements. With the upcoming SSC changes, we will not be able to implement these new reports until the end of Q4 for Q1 2011 reporting. 	AUC recognizes that implementation will take time to accomplish and will address timing with industry after the final rule is approved.
	3.1.1	<p>DIRECT ENERGY REGULATED SERVICES (DERS):</p> <ul style="list-style-type: none"> The proposed change to the rule will not support the overall goal of standardization amongst RSPs as the change allows combined call center metrics for multi-utility providers. DERS views that this necessarily does not allow for direct comparison of accurate measures of service standards of the RSP’s for AUC consideration. DERS is in support of reporting overall service level of 70/30, however DERS does not support the reporting requirement of the numerator and denominator from which the 	Regarding the differences between RSPs that make it difficult to compare statistics, the AUC agrees with DERS comments. As all of the providers other than DERS have other types of calls included in their statistics, the call answer performance measures cannot be compared across RSPs. Consequently, the purposes of those metrics are to allow the AUC to compare the RSP with itself over time and to ensure that the RSP is at least meeting the required	

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3. Performance Categories and Standards (cont'd)	3.1		percentage is calculated. Raw data comparison could bias the conclusions based on total market size managed by the individual RSP. DERS is of the opinion that this data would not provide any value to the customer.	minimum standards. Regarding reporting the numerator and denominator, the AUC will remove the sentence requiring both from the rule and finalize this detail during implementation.
			<u>ENMAX Energy Corporation (EEC):</u> <ul style="list-style-type: none"> System/Coding change is required to report measurement as defined. Additional expenses due to programming changes are expected. 	AUC recognizes that there will be additional expenses required. However, the AUC expects that any associated expenses will be prudently incurred.
		3.1.2	<u>EPCOR Energy Alberta Inc. (EEAI):</u> <ul style="list-style-type: none"> A commonly-used industry benchmark for calculating abandon rates is: (Calls answered in Y seconds + calls abandoned in Y seconds) / (total calls answered + total calls) EEAI would like to propose that this method be considered as a replacement abandon metric and will send the AUC materials supporting the benefits of this method in the next few weeks. 	As this metric is substantially different from the current metric, and as it was not brought up as a proposed change in the meetings, the AUC will not be making the proposed change at this time but will contemplate it when looking at future versions.
			<u>DIRECT ENERGY REGULATED SERVICES (DERS):</u> <ul style="list-style-type: none"> A system replacement would be required to accommodate a change from a 6 second to a 5-second measurement metric. The replacement of the current industry standard system would be of significant cost; however the current system can report in two second increments and could accommodate a change within his parameter at a reduced cost. Any minimal change to this customer service metric has zero value to the customer. DERS is not in support of reporting the numerator and denominator. 	In light of the system constraint, AUC will revise the rule to read “four seconds” instead of “five seconds”. Regarding reporting the numerator and denominator, the AUC will remove the sentence requiring both from the rule and finalize this detail during implementation.
		<u>ENMAX Energy Corporation (EEC):</u> <ul style="list-style-type: none"> System/Coding change is required to report 	AUC recognizes that there will be additional	

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3. Performance Categories and Standards (cont'd)	3.2		measurement as defined. Additional expenses due to programming changes are expected.	expenses required. However, the AUC expects that any associated expenses will be prudently incurred.
			UCA: <ul style="list-style-type: none"> Agree with the Billing Performance measures 	
			DIRECT ENERGY REGULATED SERVICES (DERS): <ul style="list-style-type: none"> (RRT bills not rendered on time) As per the minutes of the working group meeting on October 20, 2009, the decision indicates that an unscheduled interruption spanning over 3 business days and for 100% of the billing process was accepted and approved. DERS is in support of this decision, however does not support the revised proposal of one business day. 	Agreed. The AUC will change the rule accordingly.
			ENMAX Energy Corporation (EEC): <ul style="list-style-type: none"> Need to know who at the AUC will be notified and the method of notification of these “major events”. 	The AUC would rather not include a detail of this nature in the rule; instead a link to an email address will be provided on the AUC’s website in the vicinity of where the template will be located.
			<ul style="list-style-type: none"> Suggest change of wording of “100% of the RSP bills” to “100% of RSP bills scheduled to be invoiced”. 	The AUC agrees and will add a phrase to provide clarity that it is not all bills but 100 per cent of those scheduled to go to customers.
		<ul style="list-style-type: none"> Suggest trigger for notification would be if delayed by more than three business days instead of one business day. 	The AUC agrees and will change the rule accordingly.	
	3.2.1		EPCOR Energy Alberta Inc. (EEAI): <ul style="list-style-type: none"> Please add clarity to the groups for the 3.2.1 reporting by adding greater than and less than qualifiers. <ul style="list-style-type: none"> (a)greater than 1 less than 2 months (b)greater than 2 less than 3 months 	The AUC agrees but will remove the groupings from the rule. Groupings will be finalized during implementation and will be standardized in the template.

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3. Performance Categories and Standards (cont'd)	3.2		<ul style="list-style-type: none"> EEAI will need to build a report for this new requirement. Currently our resources are working on implementing the upcoming SSC changes for June 26. We would be able to implement this new report by end of Q4 to ensure Q1 2011 reporting reflects this new report. 	<p>The AUC recognizes that implementation will take time to accomplish and will address timing with industry after the final rule is approved.</p>
			<p><u>DIRECT ENERGY REGULATED SERVICES (DERS):</u></p> <ul style="list-style-type: none"> DERS is interpreting the ruling as referring to processed TBF's, not to include rejected TBFs (TBD, TBR). DERS does not support the reporting of this billing metric as outlined. The current two billing metrics being reported to the AUC provides appropriate insight into the billing performance of all RSP's. 	<p>Regarding not including rejected transactions and files, the AUC agrees with the interpretation.</p>
			<ul style="list-style-type: none"> Although the participants agreed to this reporting at the working group meeting (as per the minutes of the September 29, 2009) further investigation has identified that the reporting of these metrics would require significant financial and reporting investment while adding no value to the customer. 	<p>The AUC recognizes that the proposed metric (Sites Overdue for Billing) will increase costs in the short term as systems are changed and processes modified to allow for collection of the data. In the long term, however, the AUC is hopeful that the increased scrutiny to some of the issues affecting the market will lower the costs of managing escalated issues and will improve the customers experience overall. An added potential benefit to the RSP is lower carrying costs as improvements are made to billing processes.</p>
			<p><u>ENMAX Energy Corporation (EEC):</u></p> <ul style="list-style-type: none"> SQRP should report on days overdue instead of months. This would make it easier to report and also more consistent from quarter to quarter since months have different number of days. Example would be 61 to 90 would stand for 2 to 3 months. 	<p>The AUC agrees and will remove the groupings from the rule. Groupings will be finalized during implementation and will be standardized in the template.</p>

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3. Performance Categories and Standards (cont'd)	3.2		<ul style="list-style-type: none"> What is the preferred “from” date that should be used to start counting days not billed? Within our system it is possible to use the TBF received date and then compare it to end of quarter date for number of days not billed. Please confirm what date should be used (TBF received date, TBF site charge date, TBF site tariff end period date, etc...) 	Details of the metric will be finalized during implementation.
			<ul style="list-style-type: none"> Question on why we are reporting on kWh not billed? 	The AUC believes that usage and site count are both important for providing a true picture of what is occurring in the market.
			<ul style="list-style-type: none"> Currently EEC has some operational accounts “Vacancy”, “Enroll in Error”, etc. that we use to keep track of unbilled revenue and would be written off if customer not found after a certain length of time or for some other business reason (please confirm). 	This issue will be discussed with industry and finalized during the implementation phase.
			<ul style="list-style-type: none"> On the report template it has a column 12+ months where TBF charges are outstanding and not billed. Should we have an end date range? Example: Report only on any overdue billing where TBF received in last two years? (Note charges received in current TBF received could be for at tariff period greater than two years ago.) 	This issue will be discussed with industry and finalized during the implementation phase.
			<ul style="list-style-type: none"> How should EEC: <ol style="list-style-type: none"> Calculate the percentage? Determine the number to use for the denominator value? Use the distinct site count received in the TBF within last month? 	This issue will be discussed with industry and finalized during the implementation phase.
			<ul style="list-style-type: none"> Would the AUC use this number to calculate all percentages of sites with outstanding charges? 	This issue will be discussed with industry and finalized during the implementation phase.

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3. Performance Categories and Standards (cont'd)	3.2		<ul style="list-style-type: none"> Additional expenses due to programming changes are expected. 	<p>The AUC recognizes that there will be additional expense required to program for this metric. However, the AUC expects that any associated expenses will be prudently incurred.</p>
			<p><u>AltaGas Utilities Inc. (AUI):</u></p> <ul style="list-style-type: none"> Sites overdue for billing: Section 3.2.1 refers to receipt of the TBF charges. AUI is both the utility owner and the default supply provider. As default supply provider, AUI's billing process does not involve receiving the TBF from itself. AUI has a separate default supply customer billing process. Although integrated, it is separate from the TBC-compliant process used to bill competitive retailers providing service on AUI's system. To maintain the spirit and intent of this section of the Rule, AUI proposes to determine whether a similar statistic could be derived from its non-TBC default supply billing process. AUI's Information Systems and Technology (IS&T) resources are currently engaged until after finalization of AUC Rule 004 Tariff Billing Code implementation expected in June, 2010. AUI would initiate work on determining how it would comply with this metric in the latter half of 2010 to be ready for 2011 reporting. In the interim, AUI would require temporary relief from Section 3.2.1 until the issue can be resolved. 	<p>The AUC agrees with the idea of AUI determining a similar statistic derived from its unique billing process. AUC will work with AUI to refine the details of the metric.</p> <p>Regarding implementation, the AUC recognizes that implementation will take time to accomplish and will address timing with industry after the final rule is approved.</p>
			<ul style="list-style-type: none"> It should be noted, if a bill does not bill on its scheduled billing date, it is generally dealt with as an off cycle exception. Off cycle exceptions are usually resolved in less than 30 days. As discussed at the first working group meeting, it is counter intuitive for the companies to not issue bills in a timely manner. 	<p>Regarding the comment about it being counterintuitive for companies to not issue bills in a timely manner, AUC agrees but is aware that this is an on-going issue and source of complaints in the industry.</p>

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3. Performance Categories and Standards (cont'd)	3.2		<ul style="list-style-type: none"> AUI also wishes to confirm with the Commission, whether where kWhs has been stated, the Commission expects an energy unit equivalent (gigajoules) related to gas consumption with respect to the default supply providers. 	AUC agrees and will change all of the references from kWhs to both kWhs and GJs.
		3.2.2	<p><u>EPCOR Energy Alberta Inc. (EEAI):</u></p> <ul style="list-style-type: none"> EEAI will need to build new reporting mechanisms to track the number of business days to issue TBAs, TBRs and TBDs. We will also need to build a report to track TBRs and TBDs issued in error that were rejected by the WSP. In light of the upcoming SSC changes, EEAI would be able to have the report ready for the end of Q4 to ensure Q1 2011 implementation. 	The AUC has reconsidered these Monthly Tariff Billing Performance metrics and has decided to remove them from the rule.
		<ul style="list-style-type: none"> Throughout 2009 the number of TBRs continued to decline with 23 in Q1, 17 in Q2, 6 in Q3 and 3 in Q4. Considering the low volume of TBRs, EEAI does not believe that there is value to be gained by building a new report to track the time it takes to issue TBAs and TBRs from the time of receipt. 	The AUC has reconsidered these Monthly Tariff Billing Performance metrics and has decided to remove them from the rule.	
		<ul style="list-style-type: none"> EEAI has received rejected TBRs/TBDs in the past that were rejected by the WSP in error. Should EEAI record these as rejected TBRs/TBDs even though they were valid and qualify the issue in the written part of the report? 	The AUC has reconsidered these Monthly Tariff Billing Performance metrics and has decided to remove them from the rule.	
		<ul style="list-style-type: none"> Of the 2,131 TBDs in 2009, 1,807 or 85% were due to dispute 7008. Will this report eventually replace the Rule 004 reporting, and if so there may be value in continuing to track the reason codes behind the TBDs to show areas of concern within Rule 004. 	The AUC has reconsidered these Monthly Tariff Billing Performance metrics and has decided to remove them from the rule.	

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3. Performance Categories and Standards (cont'd)	3.2		<p><u>DIRECT ENERGY REGULATED SERVICES (DERS):</u></p> <ul style="list-style-type: none"> DERS requires clarification of this reporting request. The reporting of these metrics by DERS would require significant development cost. 	<p>The AUC has reconsidered these Monthly Tariff Billing Performance metrics and has decided to remove them from the rule.</p>
			<p><u>ENMAX Energy Corporation (EEC):</u></p> <ul style="list-style-type: none"> Okay with changes. Additional expenses due to programming changes are expected. 	<p>The AUC has reconsidered these Monthly Tariff Billing Performance metrics and has decided to remove them from the rule.</p>
			<p><u>AltaGas Utilities Inc. (AUI):</u></p> <ul style="list-style-type: none"> Monthly Tariff Billing Performance: As described above, AUI does not receive a TBF to perform its default supply billing process. AUI is not able to provide any of the metrics identified in Section 3.2.2 of the draft Rule. 	<p>The AUC has reconsidered these Monthly Tariff Billing Performance metrics and has decided to remove them from the rule.</p>
	3.3		<p><u>UCA:</u></p> <ul style="list-style-type: none"> Agree with all customer satisfaction measures. Complaints should include not only complaints filed at the AUC but all complaints to the RSP. A definition of a complaint would then have to be developed. The UCA believes that while complaints to the AUC are important it is also important to have visibility of all issues that involve consumers 	<p>The purpose of the complaint response metric is not to measure the total number of complaints but to measure the responsiveness of the RSP to the external body receiving the complaint.</p> <p>With regard to measuring overall satisfaction, the AUC is expecting the results of the annual surveys to provide measures of the level of customer satisfaction. The complaint response metric will identify whether or not the RSP is providing one external body (the AUC) with the information they need in a timely manner.</p>
			<p><u>EPCOR Energy Alberta Inc. (EEAI):</u></p> <ul style="list-style-type: none"> 3.3.1 & 3.3.2: Please see Appendix A below 	<p>Please see the response provided to Direct Energy in regard to the survey scale in section 3.3 below.</p>

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3. Performance Categories and Standards (cont'd)	3.3		<p><u>DIRECT ENERGY REGULATED SERVICES (DERS):</u></p> <ul style="list-style-type: none"> 3.3.1 & 3.3.2: DERS fully supports having a standard survey methodology and a standard set of questions utilized in order to validate customer satisfaction with all RSP's. DERS is unclear on whether it is the AUC's proposal to have a single survey conducted with the questions outlined in Appendix A or 2 separate surveys conducted as per section 3.3.2 and the associated questions contained in Appendix A. DERS is in favor of having a single survey. DERS is concerned with the proposed methodology of rating customer satisfaction utilizing an "Agree" or "Disagree" scale and suggests that a 5-point scale be employed. DERS questions the 5% satisfaction level being applied prior to proper bench marking exercise taking place. There will be a cost incurred for development of this metric. 	<p>Regarding the question about whether it is intended that the RSPs have one survey or two, the intention was that there would be no change and that the rule would require two surveys: (1) a survey of customers who had contacted the RSP within the past 30 days (section 3.3.1 in the version of Rule 003 currently in effect) and (2) an annual survey of customer satisfaction (section 4.1 in the version of Rule 003 currently in effect).</p> <p>Regarding the comments about the survey scale, as each of the RSPs use a different scale for their survey questions, adopting any one RSP's scale would be difficult to do. Each RSP has a history of responses to questions. That history represents a significant investment over time of asking the same questions using the same scale year after year. This allows the company to monitor how it is performing relative to history. This history is too valuable to ask any RSP to abandon their list of standard questions using their standard scale. The AUC, therefore, is asking the RSPs to ask a few additional questions (possibly at the end of the survey) to provide metrics that would allow the AUC to compare responses across RSPs. For this purpose, and so as not to conflict with the scale that is used for the other questions, the AUC is proposing a very simple agree/disagree scale (that would not be too similar to the scale used for other questions so as to cause confusion) that would not take long to explain to the respondents.</p>
		3.3.1	<p><u>ENMAX Energy Corporation (EEC):</u></p> <ul style="list-style-type: none"> EEC signed a contract with vendor to deliver this survey and not everything that AUC may have indicated is on the survey. 	<p>As it was decided in the working groups that the AUC would develop a few questions that all RSPs would need to ask, and as all RSPs currently use</p>

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			<ul style="list-style-type: none"> Would it be more practical for this survey responsibility to be assigned to a government body or for all Regulated Retailers to pool together and share costs for an external agency to execute? 	This would likely cause additional cost because the RSPs would continue to administer their other surveys. Therefore, there would be two more surveys per RSP rather than a few questions added on to existing surveys.
		3.3.2	<p><u>ENMAX Energy Corporation (EEC):</u></p> <ul style="list-style-type: none"> EEC has no issues with the survey questions and the frequency of the survey (annual). 	
			<ul style="list-style-type: none"> Would it be more practical for this survey responsibility to be assigned to a government body or for all Regulated Retailers to pool together and share costs for an external agency to execute? 	This would likely cause additional cost because the RSPs would continue to administer their other surveys. Therefore, there would be two more surveys per RSP rather than a few questions added on to existing surveys.
		3.3.3	<p><u>DIRECT ENERGY REGULATED SERVICES (DERS):</u></p> <ul style="list-style-type: none"> DERS agrees with the proposed language regarding the reporting of AUC complaints. DERS suggests that the proposed reporting template be changed to match the language found in 3.3.3 meaning DERS will report the number of complaints that are closed within 14 calendar days and the number that of complaints closed within 30 calendar days. 	Finalizing the reporting template will take place during the implementation phase. That said, the template may end up requiring more detail than is required by the standard. The standard represents a minimum level of performance, and the AUC may require reporting that shows how far from minimum the owner is operating.
	<p><u>ENMAX Energy Corporation (EEC):</u></p> <ul style="list-style-type: none"> Okay with changes. This is a manual process. 	Noted.		

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3. Performance Categories and Standards (cont'd)	3.4		<p><u>UCA:</u></p> <ul style="list-style-type: none"> Support the credit of \$75 to customers in the event of an error made as outlined in section 3.4 	
			<p><u>DIRECT ENERGY REGULATED SERVICES (DERS):</u></p> <ul style="list-style-type: none"> DERS recommends removal of this measurement entirely. The original intent of this metric was to ensure that the RSP had a formal billing process in place. 	<p>Instances of disconnection in error still occur in the market. The AUC would like visibility of how often it occurs.</p>
			<p><u>ENMAX Energy Corporation (EEC):</u></p> <ul style="list-style-type: none"> Okay with counting the actual written notice of pending disconnection, written notice of pending referral to a credit agency, and where customers were referred to credit agency and where customer experienced disconnection of service. However, reporting the count for the in-error situations for these action items will involve manual checks. 	<p>The AUC recognizes that there will be effort required to track and report instances of disconnection in error, etc. However, the AUC expects that any associated expenses will be prudently incurred.</p>
			<ul style="list-style-type: none"> Alteration of Terms and Conditions require significant resources. 	<p>The AUC expects terms and conditions will be changed in a timely manner and industry will utilize their normal procedures and resources for making the changes.</p>
			<ul style="list-style-type: none"> Additional expenses due to programming changes are expected. 	<p>The AUC recognizes that there will be additional expense required to program for this metric. However, the AUC expects that any associated expenses will be prudently incurred.</p>
			<p><u>AltaGas Utilities Inc. (AUI):</u></p> <ul style="list-style-type: none"> Service Guarantee: AUI is concerned with respect to this measure. It is possible, though unlikely, notices would be provided in error. However, AUI is not aware of any financial losses occurring where the disconnection has not been performed. 	<p>It is not new to Rule 003 that RSPs must pay \$75 to any customer who is erroneously provided with a written notice of pending disconnection of service or of referral to a credit agency or whose service was disconnected in error. What is new is that the AUC</p>

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3. Performance Categories and Standards (cont'd)	3.4		<p>Therefore, it does not seem appropriate to impose a financial penalty on the default supply provider unless the disconnection actually occurs.</p> <ul style="list-style-type: none"> • AUI takes significant care before performing disconnections. As a practice, AUI attempts to contact its customers to find a reasonable solution, such as making alternative payment arrangements, and avoid the necessity of a disconnection. All disconnections for non-payment must be reviewed by the Supervisor, Customer Care, beforehand. As a result, disconnections in error are almost nonexistent. AUI is unaware of any problems with disconnection notices being issued in error and has no record of any recent complaints from the AUC with respect to erroneous disconnection notices. • AUI also notes potentially penalizing utilities for erroneous disconnection notices may also serve as a deterrent to timely action on significantly overdue accounts. Rather than minimizing potential losses by disconnecting non-credit worthy customers, this penalty mechanism may result in increased bad debt levels and, consequently, greater costs to remaining customers. Again, AUI submits any penalty should be limited to payment in the event of an actual erroneous disconnection. 	<p>is requesting visibility as to how often such errors occur, and that the RSPs must put this requirement into their terms and conditions so that customers are aware of their right to obtain it.</p>
Appendix A – Customer-Initiated Contact Satisfaction Survey			<p><u>UCA:</u></p> <ul style="list-style-type: none"> • Agree with the all the survey questions as outlined in Appendix A 	
			<p><u>EPCOR Energy Alberta Inc. (EEAI):</u></p> <ul style="list-style-type: none"> • EEAI currently uses a 7-point scale for our customer satisfaction surveys. We use the results of these surveys to look for opportunities to further improve customer satisfaction. Changing this reporting to a 2-point scale will limit our ability to drill 	<p>Please see the response provided to Direct Energy in regard to the survey scale in section 3.3 above.</p>

Section	Sub-Section	Metric	Stakeholder Comments	AUC Responses
Appendix A – Customer-Initiated Contact Satisfaction Survey (cont'd)			<p>down and further investigate areas of improvement without having to commission additional surveys which may be costly. EEAI would like the surveys to be based on a scale of satisfied through to unsatisfied so we can continue to assess areas of improvement.</p>	
			<p><u>DIRECT ENERGY REGULATED SERVICES (DERS):</u></p> <ul style="list-style-type: none"> DERS fully supports having a standard sampling methodology with the understanding that all RSP's will be able to segregate and sample their individual utility customers. DERS requires clarification: Is the survey described in Appendix A which associates with 3.3.1, meant to be separate and distinct from the survey described in 3.3.2 and Appendix B? 	<p>Regarding the comments about segregating surveys, the AUC cannot see how it would be practical for the owners and RSPs to share the same customers and not be able to ask them questions about both services in the same survey. Customers' perception of the owner will colour their perception of the energy provider and vice versa. Attempting to separate the two sets of views would only be an expensive exercise that would not provide additional value. Instead, in those cases where the customers belong to both, there will be value in finding out their perception of the two services.</p> <p>Regarding the comments about two surveys and about the scale, please see the response provided to Direct Energy in response to section 3.3 above.</p>
			<ul style="list-style-type: none"> DERS is concerned with the proposed methodology of rating customer satisfaction utilizing an "Agree" or "Disagree" scale and suggests that a 5-point scale be employed. DERS questions the 75% satisfaction level being applied prior to proper bench marking exercise taking place. DERS was of the understanding that some collaboration between the various RSP's would occur with respect to the development of the questions. 	<p>Regarding the 75 per cent satisfaction level, verbal comments made by FortisAlberta in response to the draft Rule 002 and others have triggered a review of the questions. As was pointed out, it is difficult to get some customers to ever agree to the statement "[Insert Name of Owner] provides excellent service." A more reasonable question may be "I am satisfied with the level of service I received from [Insert Name of Owner]. Consequently, AUC will review the questions to ensure that the 75-per-cent target is reasonable.</p>

Section	Sub-Section	Metric	Stakeholder Comments	AUC Responses
Appendix A – Customer-Initiated Contact Satisfaction Survey (cont'd)				Regarding the comment that DERS was of the understanding that some collaboration would occur with respect to the development of the questions, in the working group meetings the onus was put on the AUC to develop the questions.
			<p><u>ENMAX Energy Corporation (EEC):</u></p> <ul style="list-style-type: none"> EEC signed a contract with vendor to deliver this survey and not everything that AUC may have indicated is on the survey. Would it be more practical for this survey responsibility to be assigned to a government body or for all Regulated Retailers to pool together and share costs for an external agency to execute? 	Please see the response provided to EEC with regards to section 3.3.1 above.
Appendix B – Overall Satisfaction Survey			<p><u>UCA:</u></p> <ul style="list-style-type: none"> Agree with all the survey questions as outlined in Appendix B. However do question that the sample size of 400 would be questionable to give an accurate reflection of customer satisfaction given RSP's receive thousands of calls per year 	Provided the respondents are selected randomly from the customer base, the AUC is of the opinion that a sample size of 400 is adequate. Since AltaGas has a much smaller customer base, further investigation would be required before the AUC would change this requirement.
			<p><u>EPCOR Energy Alberta Inc. (EEAI):</u></p> <ul style="list-style-type: none"> See Appendix A above. 	Please see the response provided to Direct Energy in regard to the survey scale in section 3.3 above.
			<p><u>DIRECT ENERGY REGULATED SERVICES (DERS):</u></p> <ul style="list-style-type: none"> DERS fully supports having a standard sampling methodology with the understanding that all RSP's will be able to segregate and sample their individual utility customers. DERS requires clarification: Is the survey described in Appendix A which associates with 3.3.1, meant to be separate and distinct from the survey described in 3.3.2 and Appendix B? 	Please see the responses provided to DERS with regards to section 3.3 and Appendix A above.

Section	Sub-Section	Metric	Stakeholder Comments	AUC Responses
Appendix B – Overall Satisfaction Survey (cont'd)			<ul style="list-style-type: none"> DERS is concerned with the proposed methodology of rating customer satisfaction utilizing an “Agree” or “Disagree” scale and suggests that a 5-point scale be employed. DERS questions the 75% satisfaction level being applied prior to proper bench marking exercise taking place. DERS was of the understanding that some collaboration between the various RSP’s would occur with respect to the development of the questions. 	
			<p><u>ENMAX Energy Corporation (EEC):</u></p> <ul style="list-style-type: none"> EEC has no issues with the survey questions and the frequency of the survey (annual). 	
			<ul style="list-style-type: none"> Would it be more practical for this survey responsibility to be assigned to a government body or for all Regulated Retailers to pool together and share costs for an external agency to execute? 	Please see the response provided to EEC in section 3.3.1 above.
Additional Comments			<p><u>DIRECT ENERGY REGULATED SERVICES (DERS):</u></p> <ul style="list-style-type: none"> DERS is in full support of a revision of rule three for the purpose of developing like metrics between the RSP’s to provide transparency and comparable performance measurement. Consideration of cost of implementation and ongoing reporting costs needs to be balanced with customer value. 	The AUC recognizes that the proposed metrics will increase costs in the short term as systems are changed and processes modified to allow for collection of the data. In the long term, however, the AUC is hopeful that the increased scrutiny to some of the issues affecting the market will lower the costs of managing escalated issues and will improve the customers experience overall.
			<ul style="list-style-type: none"> DERS wishes to clarify its understanding that the ruling does not include the Commercial Customer segment. If this is a proper interpretation, additional cost will be incurred to report by segmented customer classification. 	DERS’ understanding is correct for the surveys. For billing metrics, the AUC’s expectation is that the metrics would not exclude that segment but neither would they identify the data pertaining to that segment separately.
			<ul style="list-style-type: none"> DERS would require significant implementation time and incur significant costs to implement changes 	AUC recognizes that implementation will take time to accomplish and will address timing with industry

Section	Sub-Section	Metric	Stakeholder Comments	AUC Responses
Additional Comments			<p>proposed in this ruling. DERS' intention would be to recover any costs incurred through the customer base.</p>	<p>after the final rule is approved.</p>
			<p><u>ENMAX Energy Corporation (EEC):</u></p> <ul style="list-style-type: none"> Some of these changes will involve complex coding changes and will require time to change/update our systems. What is the AUC planned implementation date for Rule 003 approved changes? 	<p>AUC will address timing of implementation with industry after the final rule is approved.</p>
			<p><u>AltaGas Utilities Inc. (AUI):</u></p> <ul style="list-style-type: none"> AUI believes there is a need for an exemption provision in Rule 003, similar to the exemption provisions existing in AUI's Inter-Affiliate Code of Conduct. AUI has identified a specific example for an exemption above, related to sites overdue for billing and monthly tariff billing performance. 	<p>Rather than granting an exemption, the AUC would rather work with AUI to come up with alternative metrics that are as close to the intent of the original metrics as possible.</p>