

Stakeholder Comments & AUC Responses on Rule 021 (Version 2.0)

(Stakeholders: AESO, Cognera, FortisAlberta, ATCO Electric, UCA, Midas Metering, ENMAX Power, Direct Energy Regulated Services, ATCO Gas)

Stakeholder	General Comments from Stakeholders	AUC's Response
FortisAlberta	<ul style="list-style-type: none"> FortisAlberta stated that their preliminary estimate for development, testing and project management costs is estimated to be between \$0.95M to \$1.1M in order to meet the requirements of proposed changes. 	
ATCO Gas	<ul style="list-style-type: none"> ATCO Gas stated that they do not have any concerns with the proposed changes. However, they believe that there are advantages to retailers, distribution companies and the natural gas industry for the Natural Gas Settlement System Code (NGSSC) to stay aligned with the information exchange standards included in the SSC. 	
ATCO Electric	<ul style="list-style-type: none"> ATCO Electric stated that they have no significant concerns regarding the proposed changes. ATCO Electric is currently assessing the required changes to their systems. Their ability to implement the proposed changes on June 30, 2010 is based on the assumption that minimal market testing would be undertaken. 	
UCA	<ul style="list-style-type: none"> The UCA stated that they support the changes proposed in Rule 021, the Settlement System Code, and thanked the AUC for its extensive and thorough consultative process. 	

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1. Definitions	1.1	<ul style="list-style-type: none"> Added/removed/modified definitions 	<ul style="list-style-type: none"> Cognera: During the last meeting, there was some discussion around the definition of business day and adding a new term to convey the appropriate day concept. Is this going to be included in the 2010 discussion items, or does it need to be resolved now? 	AUC determined a new term would not be required.
			<ul style="list-style-type: none"> Direct Energy Regulated Services: Section 1.1. Key Terms Currently states: A Business Day has the meaning ascribed to the term "business day" as posted on the ISO's website. <i>Agreed upon change: A Business Day has the meaning ascribed to the term "business day" as defined by the ISO's website.</i> 	Agreed, with slight modification. AUC is changing the definition of a Business Day to read as follows: "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."
			<ul style="list-style-type: none"> AESO: Definition of "Code" indicates System Settlement Code rather than Settlement System Code (Rule 021). 	Agreed. AUC will make change accordingly.
	1.2	<ul style="list-style-type: none"> Modified common abbreviations in accordance with the addition/deletion of transactions 	<ul style="list-style-type: none"> No comment received on this section. 	
	1.3	<ul style="list-style-type: none"> Added a list of Acts and Regulations cited in the rule 	<ul style="list-style-type: none"> No comment received on this section. 	
	2. Responsibilities	2.1	<ul style="list-style-type: none"> No change in this section 	<ul style="list-style-type: none"> No comment received on this section.
2.2		<ul style="list-style-type: none"> Removed the last sentence, "Load settlement.....in s.4.6". 	<ul style="list-style-type: none"> No comment received on this section. 	
2.3		<ul style="list-style-type: none"> No change in this section 	<ul style="list-style-type: none"> No comment received on this section. 	
2.4		<ul style="list-style-type: none"> No change in this section 	<ul style="list-style-type: none"> No comment received on this section. 	
2.5		<ul style="list-style-type: none"> No change in this section 	<ul style="list-style-type: none"> No comment received on this section. 	
2.6		<ul style="list-style-type: none"> Removed reference "2.6 3) c In support of customer switching,.....at the discretion of the LSA". 	<ul style="list-style-type: none"> No comment received on this section. 	

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	2.7	<ul style="list-style-type: none"> No change in this section 	<ul style="list-style-type: none"> No comment received on this section. 	
	2.8	<ul style="list-style-type: none"> No change in this section 	<ul style="list-style-type: none"> No comment received on this section. 	
	2.9	<ul style="list-style-type: none"> No change in this section 	<ul style="list-style-type: none"> No comment received on this section. 	
	2.10	<ul style="list-style-type: none"> No change in this section 	<ul style="list-style-type: none"> No comment received on this section. 	
	2.11	<ul style="list-style-type: none"> No change in this section 	<ul style="list-style-type: none"> No comment received on this section. 	
	2.12	<ul style="list-style-type: none"> No change in this section 	<ul style="list-style-type: none"> No comment received on this section. 	
	2.13	<ul style="list-style-type: none"> No change in this section 	<ul style="list-style-type: none"> No comment received on this section. 	
	2.14	<ul style="list-style-type: none"> No change in this section 	<ul style="list-style-type: none"> No comment received on this section. 	
	2.15	<ul style="list-style-type: none"> No change in this section 	<ul style="list-style-type: none"> No comment received on this section. 	
3. Load Profiling Methods	2.16	<ul style="list-style-type: none"> No change in this section 	<ul style="list-style-type: none"> No comment received on this section. 	
	3.1	<ul style="list-style-type: none"> No change in this section 	<ul style="list-style-type: none"> No comment received on this section. 	
	3.2	<ul style="list-style-type: none"> No change in this section 	<ul style="list-style-type: none"> No comment received on this section. 	
	3.3	<ul style="list-style-type: none"> No change in this section 	<p>Direct Energy Regulated Services: Section 3.3 (1) Profiling Cap Currently states: The profiling cap is two MW or the WSP's current policy, whichever is lower. WSP's must specify their current policy publicly.</p> <p>Agreed upon change: The profiling cap is one MW or the WSP's current policy, whichever is lower. WSP's must specify their current policy publicly.</p>	AUC records indicate that a change to the profiling cap from 2 MW to 1 MW would provide no impact to the market, as all WSPs' current policies are well below 2 MW. Industry agreed no change would be required.
	3.4	<ul style="list-style-type: none"> No change in this section 	<ul style="list-style-type: none"> No comment received on this section. 	
	3.5	<ul style="list-style-type: none"> No change in this section 	<ul style="list-style-type: none"> No comment received on this section. 	
4. Load Settlement Calculations	4.1	<ul style="list-style-type: none"> Clarified section 4.1 (2) for WSP to serve 90 days in advance notice to retailers. Removed subsection 4.1 (5) from old version. 	<ul style="list-style-type: none"> No comment received on this section. 	
	4.2	<ul style="list-style-type: none"> No change in this section 	<ul style="list-style-type: none"> No comment received on this section. 	
	4.3	<ul style="list-style-type: none"> No change in this section 	<ul style="list-style-type: none"> No comment received on this section. 	

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	4.4	<ul style="list-style-type: none"> • Re-named "initial daily settlement" as "daily settlement" • Re-named "initial monthly settlement" as "monthly settlement" • Re-named "interim reconciliation settlement" as "interim settlement" • Re-named "final reconciliation settlement" as "final settlement". 	<ul style="list-style-type: none"> • No comment received on this section. 	
	4.5	<ul style="list-style-type: none"> • Removed section 4.5 (7) "In cases where two WSPs.... POD total for each hour." from the old version 	<ul style="list-style-type: none"> • No comment received on this section. 	
	4.6	<ul style="list-style-type: none"> • Section 4.6.1 (2) (a), removed exemption and interval meter is required. 	<ul style="list-style-type: none"> • No comment received on this section. 	
5. Settlement Error Correction	5.1	<ul style="list-style-type: none"> • Removed "Dispute Resolution Process" from version 1.1. Section 12.3 details the complaint process. 	<ul style="list-style-type: none"> • No comment received on this section. 	
	5.2	<ul style="list-style-type: none"> • Section 5.2 Pre-Final Error Correction (PFEC) – clarify that lack of a meter read shall not be a basis for a PFEC application • Modify the PFEC process and including additional deadlines for PFEC application form • Re-designed the PFEC application form and re-located the form in Appendix A – Supplementary Tables. 	<ul style="list-style-type: none"> • Cognera: We had understood that there would be no changes to Section 5; however it appears as though both the Dispute Resolution Process and PFEC processes have been updated. In 5.2.1 (6) Cognera questions whether the wording related to effort to correct needs to be strengthened (i.e. is the term 'where reasonable' required?) 	<p>At the 2009, Settlement System Code (SSC) Working Group meeting (on September 1, 2009). It was agreed that:</p> <ol style="list-style-type: none"> 1. PFAM process remains unchanged (i.e. continue to use the process as defined in Version 1.1) and 2. adopt the PFEC process as proposed (redline version dated July 31, 2009). <p>The above points were re-iterated in the meeting summary that was sent out by the AUC on</p>

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			<p>• FortisAlberta: Pre-Final Error Correction (PFEC) – Section 5.2.2 (3). FortisAlberta suggests that the AUC consider changing the reference from 'via email' to 'electronically'. Currently FortisAlberta employs an effective Web based PFEC data capture solution that provides enhanced capabilities, including historical information. The proposed email solution requires FortisAlberta to develop an alternate method which will retire a proven method that provides capabilities beyond email.</p>	<p>September 10 (without dispute). The changes to the Dispute Resolution Process were not discussed in that meeting.</p> <p>Regarding subsection 5.2.1 (6), the AUC agrees and will remove "Where reasonable".</p> <p>The requirement for the PFEC form to be sent via email has not changed from Version 1.1 to Version 2.0. Until the AUC can consult with all stakeholders on this issue, the reference will not change, and the AUC suggests that FortisAlberta raise this as an issue in the SSC Working Group for review by industry participants in the next round of SSC (2010) changes.</p>
	5.3	<ul style="list-style-type: none"> Removed all references to the "Dispute Resolution Process". Clarify the role of AESO in settling the PFAM disputes. Relocated the PFAM form in Appendix A – Supplementary Tables. 	<p>• AESO: Section 5.3.4.1 refers to the "dispute resolution process" but this process has been removed from the previous version of the Rule 021.</p> <p>Section 5.3.8.2.b.ii is incorrect. The RAM is not allocated across the LSA's service area but across the settlement zone in which the error occurred.</p> <p>Section 5.3.10.3 indicates that financial adjustments and allocations will be "payable by each party in accordance with the provisions of this Settlement System Code". The Code no longer governs how the market is financially settled – this is covered by ISO Rules.</p>	<p>Agreed. Section 5.3.4.1 is being modified so that it does not reference a dispute resolution process. Rather, in a situation where a dispute occurs, the complainant or affected party may contact the ISO to seek a re-assessment of the LSA's determination. If the complainant wishes to dispute the ISO's re-assessment, they may request a review by the Commission.</p> <p>With respect to the RAM allocation, agreed. AUC will change on subsection 5.3.8 (2) (b) (ii) to reflect the "settlement zone" rather than "service area".</p>

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				Regarding subsection 5.3.10 (3), agreed. AUC will change to read "in accordance with the provisions of the ISO Rules."
6. Functional Requirements of the Core Load Settlement Calculation	6.1	<ul style="list-style-type: none"> No change in this section 	<ul style="list-style-type: none"> No comment received on this section. 	
	6.2	<ul style="list-style-type: none"> No change in this section 	<ul style="list-style-type: none"> No comment received on this section. 	
	6.3	<ul style="list-style-type: none"> No change in this section 	<ul style="list-style-type: none"> No comment received on this section. 	
	6.4	<ul style="list-style-type: none"> No change in this section 	<ul style="list-style-type: none"> No comment received on this section. 	
	6.5	<ul style="list-style-type: none"> Section 6.5.3 (1), clarify the Zone Load Zero Balance Check to spell out inclusion and exclusion of the components. Removal of the Profiled Divergence Test Section 6.5.3 (8) Percentage of Non-estimated Result Source Data e) Percentage of non-estimated Sites to "Percentage of non-estimated Records" 	<ul style="list-style-type: none"> No comment received on this section. 	
7. Information Exchange	7.1	<ul style="list-style-type: none"> In "Business Process Flows and Transaction Sets Required for Load Settlement" Table, added <ul style="list-style-type: none"> RDS RDN USA Deleted <ul style="list-style-type: none"> CSE SSR SIR Changed DSR, DSN to requiring electronic transmittal 	<ul style="list-style-type: none"> FortisAlberta: Information Exchange – Section 7.1. The proposed change will no longer require that the revoke de-energize transactions (RDR) be communicated through Dropchute. FortisAlberta's systems and processes were designed to receive the RDR transactions through Dropchute only. If retailers are permitted to transmit the files through email, FortisAlberta will need to develop a parallel process to manage this new requirement. FortisAlberta suggests that this change be reconsidered as parallel systems and processes create additional cost and complexity for all parties. For these reasons, the RDR transactions should continue to be communicated via Dropchute only. 	The recommendation made by the Transactions Subgroup was in response to an issue raised by a WSP who recommended the removal of the transaction as retailers tend to call or email when they need a de-energize revoked, as these are often very urgent situations. The Transactions Subgroup recommended "leaving transactions in place but correcting s7.1.1.2) a) viii) to agree with Table 6 which indicates electronic submission is not required, i.e. each WSP can

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				determine whether they use the transaction or accept phone call/email or both." (See Transaction Subgroup report dated April 17, 2009.)
	7.2	<ul style="list-style-type: none"> Deleted section 7.2 (4) from version 1.1 "Additional documentation regarding..... Sample File Layouts, etc.)." 	<ul style="list-style-type: none"> No comment received on this section. 	
	7.3	<ul style="list-style-type: none"> Deleted section 7.3. (2) "Historic Consumption Data from the MDM", since this is covered in AUC Rule 010. 	<ul style="list-style-type: none"> No comment received on this section. 	
	7.4	<ul style="list-style-type: none"> Removed subsections 7.4.6) and 7) from version 1.1. Added new subsection (b) to Erroneous Enrollment "When the LSA discovers that a Retailer..... that the Site was enrolled in error.". This is also referenced in subsections (c) & (d). 	<ul style="list-style-type: none"> No comment received on this section. 	
	7.5	<ul style="list-style-type: none"> No change in this section 	<ul style="list-style-type: none"> No comment received on this section. 	
	7.6	<ul style="list-style-type: none"> No change in this section 	<ul style="list-style-type: none"> No comment received on this section. 	
	7.7	<ul style="list-style-type: none"> New section added to explain how Retailers are to request a removal of a load limiter and they want the Site fully energized. 	<ul style="list-style-type: none"> No comment received on this section. 	
	7.8	<ul style="list-style-type: none"> New section added to explain how Retailers are to request a removal of a load limiter and they want the Site fully de-energized. 	<ul style="list-style-type: none"> No comment received on this section. 	
	7.9	<ul style="list-style-type: none"> New section added to clarify when a Retailer requests to de-energize a Site, the WSP 	<ul style="list-style-type: none"> AESO: Section 7.9.1 indicates that an appropriate De-energize reason code be used but there is not an 	Table 34, field sequence 11 has a list of "reasons for de-energize", "0001Customer Request ... 0006

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		may choose to install a load limiter instead.	appropriate code for this defined in the list of reason codes in Table 34 DER Transaction Layout.	Vacant Premises". There is no specific de-energize reason code to request a limiter, as limiters are installed by the WSP when they will not de-energize a site due to seasonal or safety issues. Section 7.9 is being changed to clarify that limiters are installed at the discretion of the WSP.
8. Standards for Load Profiles Based on Load Research Samples	8.1	<ul style="list-style-type: none"> No change in this section 	<ul style="list-style-type: none"> No comment received on this section. 	
	8.2	<ul style="list-style-type: none"> No change in this section 	<ul style="list-style-type: none"> No comment received on this section. 	
	8.3	<ul style="list-style-type: none"> No change in this section 	<ul style="list-style-type: none"> No comment received on this section. 	
	8.4	<ul style="list-style-type: none"> No change in this section 	<ul style="list-style-type: none"> No comment received on this section. 	
9. Information Exchange Standards	9.1	<ul style="list-style-type: none"> Deleted the last sentence " In the event that a WSP's..... impede the operation of the market." 	<ul style="list-style-type: none"> Direct Energy Regulated Services: Section 9.1.2. Information Exchange A large portion of this section has been omitted which poses as a business issue that needs to be addressed further. <p>In the event that a WSP's implementation differs in certain details from the approved specification, a standard for assessing such variances will be the extent to which those variances were necessary and reasonable in light of the WSP's overall system structure, and the extent to which the resulting differences impede the operation of the market.</p>	The sentence that was omitted was a sentence that permitted WSPs to gradually transition their systems to match the requirements of the Code. They could request exemptions when necessary to allow them not to be compliant. As has been discussed in industry meetings, prior exemptions are being transitioned out and new exemptions will no longer be granted.
	9.2	<ul style="list-style-type: none"> No change in this section 	<ul style="list-style-type: none"> No comment received on this section. 	
	9.3	<ul style="list-style-type: none"> No change in this section 	<ul style="list-style-type: none"> No comment received on this section. 	
	9.4	<ul style="list-style-type: none"> Change the DST table as an example All ID tables are relocated in Appendix A – Supplementary Tables. In Table 5 – Site ID Catalogue, added field #35 Tariff Rate Code. 	<ul style="list-style-type: none"> FortisAlberta: Site ID Catalogue – Table 5 – Section 9.4.6.14. A new field, field sequence 35 – Tariff Rate Code, requires that within the Site ID Catalogue the LSA publish the associated tariff rate code for each Site ID. FortisAlberta currently has two streetlight tariff rates and a Site ID may have both rates applying to specific lights. To ensure consistency with the tariff 	The intent of adding a Tariff Rate Code in the Site ID Catalogue is to provide more Site information to the Retailers to reduce the number of erroneous enrollments. As long as the Site is identified as a Streetlight Site and attached a streetlight rate, Retailers should then be able to distinguish a

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			header data published within the tariff bill files, FortisAlberta requests that only one rate is published per Site ID within the Site ID Catalogue.	streetlight site from another type of site.
	9.5	<ul style="list-style-type: none"> • Removed reference to SIR transaction from subsection 9.5.4 2) a) from version 1.1 	<ul style="list-style-type: none"> • No comment received on this section. 	
	9.6	<ul style="list-style-type: none"> • Added subsection 9.6.1.1 (3) to clarify the metering data status, either ES or ME. This applies to micro-generation data. • Relocated the DCM & GCM Status Flag codes to Appendix A – Supplementary Table. • Changed DCM transaction as follows: <ul style="list-style-type: none"> ○ Seq # 10 – changed to Number (12,4) ○ Seq # 19 – changed to Number (14,9) • Changed GCM transaction as follows: <ul style="list-style-type: none"> ○ Seq # 13 – changed to Number (14,9) • Removed all subsection 9.6.1.4 – Cumulative Switch Estimate Consumption to Retailers. • Added subsection 9.6.2.4.1(3) in DSM Transaction to clarify the metering data status, either E or M. • Changed WSD transaction as follows: <ul style="list-style-type: none"> ○ Seq # 16, 18, 19 – changed to Number (12,4) • In the SMC, added “Load Limiter” as a reason to send 	<ul style="list-style-type: none"> • FortisAlberta: Update Site Address (USA) – Section 9.6.5.2. There are no business rules within this section of the Code that provides the Load Settlement Agent (LSA) with the triggers for the transaction's generation. For FortisAlberta's system design purposes, the transaction will be generated only when the LSA updates any of the data fields for an existing site (data fields provided within section 9.7.3). Therefore, a USA transaction will not be created for an initial Site ID creation or upon the receipt of a retailer initiated UCI transaction. Business rules within this section would provide greater clarity for more timely transaction processing and potentially avoid confusion in the market. 	<p>The business rule of the USA transaction is already included and states, “This transaction is used by the WSP to notify the Retailer when a Site's service address has changed.”</p> <p>FortisAlberta is interpreting the business rule correctly. When a Site ID is first created, the Site is not yet enrolled by a Retailer. Until the Site is enrolled by a Retailer, there would not be a Retailer to inform. Also, when the Retailer changes the mailing address for a site and sends a UCI to inform the WSP, the WSP should not use this as a mechanism to change the service address. Service address changes typically come from municipalities and, in some cases, developers, not from customers or Retailers. So, a UCI (which is sent by the Retailer) should not trigger a USA.</p>

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		<p>the transaction and changed the transaction as follows:</p> <ul style="list-style-type: none"> ○ Seq # 7 – added “L” as an option ○ Seq # 13, 19 & 21 – changed to Number (14,9) ● Added Table 26 -USA Transaction ● Moved Revoke De-Energize Request (RDR) out from section 9.6 to section 9.7 as it no longer requires electronic transmittal. ● Moved DSR and DSN from section 9.7 to 9.6 as they now require electronic transmittal. ● Significant changes in De-select Retailer Transaction set process rules (see section 9.6.8). ● In the DSR transaction, changed as follows: <ul style="list-style-type: none"> ○ Seq # 7 – meaning of reason code “0003” changed from “Other” to “Erroneous Enrollment” ● Added new transactions: Table 39 - RDS and Table 40 - RDN 		
	9.7	<ul style="list-style-type: none"> ● Deleted SSR and SIR transactions from version 1.1 	<ul style="list-style-type: none"> ● No comment received on this section. 	.
	9.8	<ul style="list-style-type: none"> ● Relocated the Transaction Status Codes table to Appendix A – Supplementary Table 	<ul style="list-style-type: none"> ● No comment received on this section. 	
10. DropChute™	10.1	<ul style="list-style-type: none"> ● No change in this section 	<ul style="list-style-type: none"> ● No comment received on this section. 	
Security	10.2	<ul style="list-style-type: none"> ● No change in this section 	<ul style="list-style-type: none"> ● No comment received on this section. 	
Requirements	10.3	<ul style="list-style-type: none"> ● No change in this section 	<ul style="list-style-type: none"> ● No comment received on this section. 	

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	10.4	<ul style="list-style-type: none"> No change in this section 	<ul style="list-style-type: none"> No comment received on this section. 	
	10.5	<ul style="list-style-type: none"> No change in this section 	<ul style="list-style-type: none"> No comment received on this section. 	
11. Performance Standards for Meter Data Managers Operating in the Province of Alberta	11.1	<ul style="list-style-type: none"> Modified "Roles and Responsibilities" of MDM to better align with EUA's. 	<ul style="list-style-type: none"> No comment received on this section. 	
	11.2	<ul style="list-style-type: none"> Data Performance Reporting metrics have been changed (see section 11.2.6 and newly created Table A-10 in Appendix A) 	<ul style="list-style-type: none"> Direct Energy Regulated Services: Section 11.2.2.1; Figure 1. VEE Overview Currently states: a) MDM shall perform validation, estimation and editing of interval metering data at the Real Metering Point. Agreed upon change: a) MDM shall perform validation, estimation and editing of interval metering data at the Contributing Meter Point. 	Latest Version 2.0 states, "MDM shall perform validation, estimation and editing of interval metering data at each contributing meter." This corresponds to the AUC record of the agreed upon change.
	11.3	<ul style="list-style-type: none"> Changed the "Data Collection Cycle" to obtain at least one actual meter reading from 100% cumulative meters at a minimum of once every six months.(See subsection 11.3.1.1) Removed Data Performance Metrics from version 1.1 since AUC Rule 002 will cover this topic. 	<ul style="list-style-type: none"> AESO: The issue of MDM standards and reporting for Cumulative Meter Data Performance was initially raised to the AUC by AESO in 2008 because compliance monitoring revealed that the MDMs' self reporting was being handled inconsistently. The performance results were often being overstated in order to meet the specified targets. Metering is a key input to the load settlement process and historically there have been significant corrections to the market to resolve metering errors. The Standards were discussed over the last 10 months both at the AUC's Settlement Working Group and at a Metering Performance subgroup and a revised Standard was issued for review and comment in the middle of June this year. Stakeholders then had several opportunities to comment on the proposed changes as revised drafts of Rule 021 were released and no changes were made to the draft Standards during this time. 	<p>In section 11.3.4 Data Provision, subsection 11.3.4 (1) will be amended to ensure that the MDM will provide the DCM to the LSA and Retailer within eight business days from the date the actual meter read is obtained.</p> <p>With respect to the change of section 11.3.1.1 data collection cycle, the intent of this change is to enforce that the MDM must obtain at least one meter read from its 100% cumulative meters within 6 months. It is not a relaxation of the rule; rather the MDM must make every effort to obtain a meter read. Since the final settlement is done in the seventh month, enforcing MDMs to obtain actual meter reads once every 6-months will help to settle</p>

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			<p>The draft now released for comment has removed without consultation the need for MDM performance standards related to cumulative metering and the associated reporting of them. The changes include removing the requirement read 98% of meters every two months and the requirement to provide meter read data to the market within 8 days of the actual read.</p> <p>While Section 11.3.1.1 now includes that the MDM must obtain at least one meter reading from 100% of cumulative meters at a minimum of once every six months, this standard cannot be accurately monitored for compliance. The actual meter reads are not provided to the market or to AESO for compliance purposes (only the resulting load settlement ready DCM transactions). In addition it is actually a relaxation of the current rule which states that the timeline is 2 rather than 6 months.</p> <p>We believe that this will have a significant detrimental effect on the performance of the market, especially as retailers are also no longer able to use the PFEC mechanism to ask for missing reads.</p> <p>Although the AUC intends to include these cumulative metering standards in AUC Rule 002 (Electric Distribution System Owner (Wire Owner) Service Quality & Reliability Performance, Monitoring, and Reporting Rules), we believe that it is critical that performance to the standards is still actively monitored and is more than simply self-reported. We recommend that Rule 021 v2.0 maintains the ability to monitor MDM performance. The draft change does nothing to promote a fair and consistent market.</p>	<p>the market more accurately and reduce significantly the number of PFAMs.</p> <p>With respect to the MDM reporting cumulative meter reads, reporting metrics will be included in Rule 002, which will provide greater transparency on those Sites that were not read in a 6-month period. Those statistics are helpful to the industry to understand exactly how many "hard-to read" Sites exist and how the WSP is planning to tackle the issue. In addition, the reporting metrics defined in Rule 002 will also include the percentage of Sites read every month (instead of the current reporting of every 65 days.) This reporting is more stringent than what was required before.</p> <p>In addition, one of the decisions that was made in the PFAM working session held on September 1, 2009 was that the AESO will monitor PFAMs, PFAM causes and MDM performance in obtaining reads. The Code will be amended to include a new section 2.17, Compliance Monitoring by the ISO, which will clarify the role of the ISO in compliance monitoring.</p> <p>Between changing the Code to</p>

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			<p>require reads for every Site before final settlement, requiring the AESO to monitor MDM performance in obtaining reads, and requiring the WSP to report (through Rule 002) any sites that do not have reads within the 6 months as well as the percentage of sites read every month, the AUC is anticipating significant improvements in the operation and settlement of the market.</p> <p>• Direct Energy Regulated Services: Section 11.3.1.1 (2) Data Collection Cycle Currently states: (2) The MDM shall document the reasons for unsuccessful attempts and be able to provide such upon request by the ISO or Commission. In the case where a meter read has not been obtained in more than seven calendar months, a list of Site ID(s) and documented reason(s) must be submitted to the ISO and commission at the same time as the cumulative MDM report.</p> <p>Agreed upon change: (20 The WSP shall document the reasons for unsuccessful attempts and be able to provide such upon request by the ISO or Commission. In the case where a meter read has not been obtained in more than seven calendar months, a list of Site ID(s) and documented reasons(s) must be submitted to the ISO and commission at the same time as the cumulative MDM report.</p> <p>DERS is of the view that the WSP must be held accountable for proper documentation and that it should be clearly defined in this sub-section.</p>	<p>Reporting of Sites and reasons for not obtaining reads is moving from Rule 021 to Rule 002, which places the responsibility for reporting with the WSP, rather than with the MDM.</p>
12. Compliance	12.1	<ul style="list-style-type: none"> • No change in this section. 	<ul style="list-style-type: none"> • No comment received on this section. 	

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Monitoring Standards	12.2	<ul style="list-style-type: none"> • Changed Reporting Requirements (see section 12.2) • Tables 60 and 61 in version 1.1 have been removed. • Tables 54 through 59 in version 1.1 have been modified, combined and relocated to Appendix A – Supplementary Table, Table A -10. • Relocated Table 62 from version 1.1 to Appendix A – Supplementary Table A-11. • Changed reporting timing (see subsection 12.2.1 (3)) 	<ul style="list-style-type: none"> • Cognera: Cognera would like to confirm that the cumulative data reporting requirements removed from section 12 will be addressed by Rule 002? If the cumulative sections have been removed for consistency sake, why have the interval reporting requirements remained? Is it possible to get a sense of the conceptual intent driving this change? 	<p>Timing on data collection of interval meters is done on a daily basis and has a significant impact on the NSLS calculation, which will affect the accuracy of the energy allocation of cumulative sites. Hence, from a compliance monitoring perspective, reporting of performance in obtaining interval meter data must be more timely than what would occur through Rule 002. Through Rule 002, AUC will be focusing on addressing issues that result in PFAMs by focusing on cumulative meter read performance.</p>
			<ul style="list-style-type: none"> • MIDAS Metering: While MIDAS agrees with and supports the notion of and the need for MDM performance reporting where such reporting is designed to ultimately effect a positive improvement in the overall quality of the settlement data, MIDAS contends that the creation and submission of the performance reports (summary of interval metering results data and information) to which Section 12.2.1 of ISO Rule 021 refers should be completed by the ISO directly rather than being tasked out to all of the Metering Data Managers (MDM). <p>MIDAS supports this contention with the following principle points:</p> <ul style="list-style-type: none"> • The ISO already receives all of the metering data necessary to produce the MDM performance reports themselves. • In response to the demise of the eLSI project several years ago, the ISO directed the MDMs 	<p>AUC has confirmed that Midas metering is referencing to AUC Rule 021, not ISO Rule 021. With respect to section 12.2.1 of the AUC Rule 021 (Version 2.0), it is not a new addition the rule. Rather the reporting rules are equivalent to those specified in Section 11.3.6 of Rule 021 (Version 1.1). MDMs are expected to continue their reporting routines to AESO without any system changes. AUC suggests that MIDAS raise this as an issue in the SSC Working Group for review by industry participants in the next round of SSC (2010) changes.</p>

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			<p>to send duplicates of each and every metering data file intended for settlement use to the ISO so that the ISO could effect it's mandated compliance monitoring role – a function that would have otherwise been incorporated into eLSI. MDMs complied with this directive and have since provided the ISO with the requested metering data so that they could carry out their mandate.</p> <ul style="list-style-type: none"> • The overall cost of implementing the MDM performance reporting function will be far less if the reporting process is designed, developed and implemented by the ISO centrally rather than undertaken by all of the individual MDMs. - By directing all of the MDMs to implement performance monitoring within their own systems the ISO is subjecting the entire industry (and ultimately the rate payers) to the additional and unnecessary costs associated with what will be multiple interpretations and implementations of the same reporting function. - The ISO is seeking uniformity in compliance reporting methodology – a state that may prove exceedingly difficult to achieve given the variety of systems that have been created to handle metering data. 	
	12.3	<ul style="list-style-type: none"> • No change in this section 	<ul style="list-style-type: none"> • No comment received on this section. 	

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Appendix A – Supplementary Tables	All tables	<ul style="list-style-type: none"> • Table A-1, new PFEC form • Added “Active” and “Expiry” dates in Tables A-4, A-5, A-6 and A-7. Also, added DCM, DIM and DSM transactions in Table A-6. • Added, removed and modified transaction status codes in Table A-9. • Table A-11, removed Profiled Divergence reporting. • Added Transaction Timing Table (see Table A-12). 	<ul style="list-style-type: none"> • Cognera: Appendix A – Table A-1. If an agent is submitting on behalf of a retailer, should this be indicated/included in the “Application Initiated By” section? Appendix A – Table 5 – 1050 and 1080 appear as they are also contracted to a third party (and should be indicated as such), there is no active LSA for Ponoka prior to October 2004, and is the active date for 1050 correct? 	<p>In the “Initiator Contact Information”, there are fields for initiator or agent to fill-in name and contact information.</p> <p>Agreed. AUC will make changes accordingly.</p>
			<ul style="list-style-type: none"> • ENMAX Power: ENMAX Power proposed to add error codes: 1401 – Temperature outside limits, load limiter installed 1402 – Disconnect warning notice left Site 0203 – Requested de-select date greater than 60 days. 	<p>Agreed. AUC will make changes accordingly.</p>