

Introduction:

In bulletin (Bulletin 2024-01), the Alberta Utilities Commission (AUC) addresses the Emergency Billing Relief Program (EBRP). The AUC requested stakeholder input to enhance predictability and transparency during emergency situations. Stakeholders are invited to participate in the consultation process, which aims to incorporate requirements for emergency billing relief into a new rule. The following is Cognera's response to the request for feedback due March 19, 2024

1. What costs should be eligible for recovery as part of the emergency billing relief program?

We have broken our response out into 3 separate categories based on the question.

a. Cost Recovery for System Development:

We recognize that system development efforts are essential for implementing changes related to the EBRP. These costs may include software updates, process modifications, and staff training.

- According to the billing relief manual, only DFO's can apply to the Alberta Utilities Commission (AUC) for cost recovery related to billing credits provided to customers. It is unclear why this has not been extended to Retailers for the program.

b. Billing Relief Calculations:

For Retailers billing based on settled consumption, we encountered the following scenarios:

- **Power Sites:** We received both the Tariff Billing File (TBF) adjustment and a settlement adjustment. As impacted customers are calculated using both settled consumption (Rule 021) and tariff billing components (Rule 004), this allowed us to easily credit customers for both the commodity charge and distribution and transmission costs. We would recommend the continued use of this procedure.
- **Gas Sites:** The commodity, distribution and transmission adjustments were calculated within the one-time charge mechanism within the TBF (Rule 004). Additional work was needed to determine the adjustment applicable to each customer. This process of supplying the adjustment was not transparent. We strongly recommend the procedure for gas sites is the same procedure used by power DFO's.

c. Separating Commodity and Tariff Components:

- Section 4.2.2(c) emphasizes the importance of presenting billing-relief information clearly to customers. Ideally, retailers should display the billing-relief period and credit as a separate line item titled "Evacuation period billing credit."
 - To enhance clarity, we propose handling the commodity piece separately from the distribution and tariff components for both power and natural gas sites.
 - If the one-time charge mechanism does not change, for transparency we recommend using a specific and unique one-time charge code for the program. This code would be supplied by DFO's in the One-time Charge code file (OCF). Using this approach ensures that adjustments related to the relief program via TBF are more easily coded for invoicing display. Additionally, we would recommend that all DFO's power and gas use the same code to reduce the

burden to implement this request. Based on the current mechanism it is difficult to separate the line item within the TBF as “Evacuation period billing credit”.

2. What costs should be excluded?

- We have no recommendations currently.

3. What is the best source of information regarding evacuations?

- We would recommend continuing the use of the Alberta Emergency Alert website as the initial source of impacted areas.
- Once impacted sites were identified Cognera received notifications from the AESO detailing impacted sites. A central source of information was found to be beneficial to ensure notifications were sent to the right groups (both Retailers and Agents).

4. What considerations exist to extend the 2023 EPRP to emergency events beyond wildfires?

- It is reasonable to expect that once this process is in place it could be extended to other emergency events. We expect clarification on coding the adjustment as per Rule 004 and naming the billing event for invoicing display purposes.