

ALBERTA TARIFF BILLING CODE

WIRE OWNER PROCESSES FOR PRESENTING CHARGE ADJUSTMENTS GREATER THAN 365 DAYS FROM THE BILL DATE

V1.0

DATED: SEPTEMBER 28, 2005
(BASED ON INDIVIDUAL WIRE OWNER SUBMISSIONS)

Alberta Energy and Utilities Board 640 – 5 Avenue SW Calgary, Alberta T2P 3

OVERVIEW

The program has asked wire owners to provide feedback on action item 215, where wire owners are seeking clarification on whether they are required to net each individual tariff bill period that is greater than 365 days from the bill date, where a Cancel/Rebill is required that may span multiple tariff bill periods. An example of this is, FortisAlberta is netting together all tariff bill periods greater than 365 days and creating a single one-time charge credit if the total amount equals a debit to the site, excluding competitive or default customers.

This presents a potential problem where multiple customers may have been present for the period in question, since we do not have a basis for allocating any potential credits back to the customers. EPCOR Energy is also concerned that different Wire Owners will support different approaches going forward, and would welcome standardization on methodology.

The following is each individual wire owner's submission to the program as of September 28, 2005:

1 ATCO ELECTRIC

The following is ATCO Electric's response to action item 215:

For billing errors that result in a credit;

- All charges are cancelled back to the period where the error(s) occurred.
- New charges are generated to the current billing period.
- How far back we go is dependent on the error type but generally 2 to 7 years. Our T's and C's say 2 years however for some types of errors such as metering errors, we go back up to 7 years.
- For billing errors that result in a debit for a period where the error occurred >365 days ago; No cancel rebills are performed for errors where the period end date is >365 days old.

2 ENMAX POWER CORPORATION

The following is ENMAX Power Corporation's response to action item 215:

- In regards to action 215, yes EPC does currently deal with data that is older than 365 days. Below is a description of our policy in accordance with our Terms and Conditions, the SSC and the Electricity and Gas Inspection Act:
- EPC will calculate appropriate DT adjustments on valid PFAMs filed by Retailers according to the same thresholds indicated in section 5.3 of the current version of the Settlement System Code (SSC).

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- DT adjustments will be processed within the 12-month retro period indicated in EPC's Terms and Conditions from the point of discovery by either the Retailer or EPC for both PFAM and non-PFAM related DT adjustments.
- Any measurement or settlement errors discovered by EPC in its records will be corrected to their date
 of origin and corrected data will be issued to the market if required.
- Retailers will receive appropriate detail for each DT adjustment applied to their EPC DT invoice.

3 EPCOR DISTRIBUTION

The following is EPCOR Energy's response to action item 215:

EPCOR has dealt with adjustments greater than 365 days through the processes set out in the market place. In general, any consumption (or demand) adjustments past the point of Final settlement must be dealt with through a PFAM process (which includes sending out standard transactions such as RSAs and RAMs to report adjustments). Most of these are dealt with within 1 year but we have had some PFAMs greater than 1 year. It should be stated that the settlement (energy adjustment) portion of the process is standard. However, adjustments to Tariff billing do not have a standard process. Nevertheless, EDI manually calculates the distribution charges related to the energy or demand being adjusted. In general, EDI ensures that any charges owed to the customer are calculated and presented back to the retailer. Charges owed by the customer are not as a high priority (and are often forgiven). As an indicator of magnitude, EDI has only processed 26 PFAMs since market opening, only 18 resulting in Tariff recalculation, and most within 1 year. Therefore, this issue is very small in magnitude for EDI.

4 FORTISALBERTA

The following is FortisAlberta's response to action item 215:

- FortisAlberta deals with charges older than 365 days in accordance with the FortisAlberta Terms and Conditions which restrict all adjustments, both charge and credit, to the earlier of the error or the most recent 12 billing periods, except for sites deemed as eligible under the Regulated Default Supply Regulation. For those sites deemed as eligible, credit adjustments are made beyond the 12 month limitation when required once identified by the Regulated Rate provider or if authorized internally by senior management.
- FortisAlberta's current process for achieving this adherence is to cancel back all documents to the earliest billing period in which the error occurred, and then to offset any impacts in excess of 12 billing periods (other than credits for RRT sites) through the application of a miscellaneous

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adjustment. We continue to work with our software developers to determine if there is an alternative presentation available, but to date we have been unable to determine another presentation that meets the constraints of the software program, the tariff bill code, the Terms and Conditions and the regulation.

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