



Tariff Billing Code Compliance Plan – November 28, 2005

Revised September 10, 2007

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1.0 - Introduction

This document shall serve as ATCO Gas' compliance plan as per section 6.1 of the Tariff Billing Code, Directive 012. From time to time, this document will be updated in accordance with the Code.

This directive sets out the Alberta Tariff Billing Code to establish the standards for communicating site-specific distribution and transmission tariff charges and usage information relevant to calculating energy charges in a format for the operation of an efficient, fair, and openly competitive electric and natural gas markets in Alberta. These obligations arise through the *Electric Utilities Act*, the *Gas Utilities Act* and their associated regulations.

The Alberta Energy and Utilities Board (EUB/Board) has established that "bill ready" is the mandatory distributor billing process to be used in the Alberta electric utility and natural gas utility marketplaces. Under this process, the distributor calculates its tariff charges and sends these charges to the retailer. Unless mandated by legislation, the retailer has the sole discretion, within the framework provided in the regulations, to determine the manner in which tariff and energy charges are presented in a bill to its customer.

1.1 - Business Assumptions

- The compliance plan, as submitted, includes an implementation schedule in 3 phases where functionality and compliance to the Code are added throughout each phase.
- ATCO Gas will not implement optional requirements identified in the Code unless they are existing features of the current ATCO CIS Distribution System or it is deemed to be economically viable. ATCO Gas will communicate any changes in accordance with the Code.
- To eliminate the massive effort of changing the related systems, ATCO Gas will continue to use exclusive-inclusive as the format for charge period start and end dates. However, the tariff bill file generated by the ATCO CIS Distribution will be translated to the inclusive-inclusive format prior to sending to retailers.
- Post implementation exemption requests are included in 2.0. The noted exemptions are those that AG and/or the EUB consider significant such that an explicit exemption is required. ATCO Gas will not generate pre-implementation exemption requests however pre-implementation processing details are provided in Appendix E of the Tariff Billing Code
- ATCO Gas will comply with the EUB ATCO Gas directed test schedule and plan excepting certain negotiated procedures or processes that may not fit ATCO Gas systems, processes or timelines.

2.0 - Exemption Requests

2.1 - RRT Energy Rate Price Change Processing and Metric Exemption Request

ATCO Gas requests an exemption to process a Usage Period Event as per Table 3-1 of the Tariff Billing Code 1.4 (Tariff Billing Events, when an RRT energy price change occurs). ATCO Gas has reached a bilateral agreement with Direct Energy Regulated Services such that Direct Energy Regulated Services will process usage period splits when an RRT price change occurs.

In addition, ATCO Gas requests an exemption from the Level 3 validation as per Table 5-2 regarding Usage Period Events associated with RRT price changes.

At some time in the future, should Direct Energy Regulated Services determine that they require distributor processing of an RRT price change event, ATCO Gas would proceed to build such functionality based on an agreed upon 6 months advanced notification from Direct Energy Regulated Services. ATCO Gas would not accept advance notification of an RRT price change as per element 14 "Scheduled RRT Energy Rate Price Change Notice" from Table 2-1 Performance Requirements until the processing capability is forecasted to be completed within 60 days.

2.2 - Rate 13 Tariff Bill Code Exemption Request

As of September 1, 2007 ATCO Gas no longer requires an exemption to process Retailer Delivery Service Large Use – Rate 13 sites from the Tariff Billing Code. With the approval of its Phase II rate structure effective September 1, 2007 these sites are billing in ATCO CIS allowing TBC transactions to be utilized.

Prior to September 1, 2007 Rate 13 (Retailer Delivery Service Large Use) sites were administered and billed by ATCO Pipelines (AP) on behalf of ATCO Gas via use of AP TIS (Transportation Information System). Enrollment, de-enrollment and billing were administered outside ATCO CIS and done through different processes.

2.3 – Demand Determinant Record Ratchet Datetime

ATCO Gas requests an exemption from publishing the demand ratchet Datetime, applicable to Rate 3 customers only. Currently ATCO CIS does not support this functionality. At this time, the Datetime field in the demand determinant record will be null. We expect to have this functionality at Phase 3.

2.4 - Demand Determinant Record Ratchet Months

ATCO Gas requests an exemption from publishing the Ratchet Period Months in the demand determinant record, applicable to Rate 3 customers only. Currently ATCO CIS does not support publishing the Datetime that the ratchet was set. At this time, this field will be null. We expect to have this functionality at Phase 3.

2.5 – 27-35 Day Tariff Bill Period Limit

ATCO Gas requests an exemption for the requirement to estimate up to the scheduled read date when the tariff bill period is less than 27 days. Table element 5 of 4-15 and production rule 4 suggest that a distributor must estimate up to the scheduled read date when reads are shorter than 27 days in length. Our system will not have that ability until completion of Phase 3.

2.6 – DCM to TBF Usage Alignment

Please see Appendix B

3.0 - Implementation Schedule

ATCO Gas has separated the project into 3 phases that include key project elements and implementation dates.

3.1 - Phase 1 Schedule & Processing Detail

ATCO Gas's current Electronic Bill File (EBL) will continue to be processed and published up to the completion, testing and implementation of the Phase 2 deliverables. Phase 1 includes functional changes to support alignment functionality as requested by the EUB and also includes additional functions achievable within the first phase. A summary of the work and status is listed below;

- Billing Period Alignment Complete
- Billing Cycle Change Alignment Automation Complete
- Publish & Maintain Billing Calendar on Web Site Complete
- Publish & Maintain Site-Cycle Catalogue Complete
- Billing Consumption Alignment Complete

3.2 - Phase 2 Schedule & Processing Detail

In this phase, significant and fundamental changes will be made to ATCO Gas' billing system. The largest changes will result in the system being able to publish off-cycle tariff files and invoices. ATCO Gas' CIS billing functions will be modified such that the Tariff Bill File is not a retailer wholesale invoice but instead, a file that contains charges and details as per the file format and content requirements of the Code. TBD transactions can be received and processed at the completion of this phase. All TBDs will be investigated and responded to in accordance with ATCO Gas' Terms and Conditions for Distribution Access Service. A TDN would not be generated during this phase; however the retailer will be notified that the dispute has been received. Please see Note 2.

A summary of the work and expected completion date is listed below;

- Off Cycle Publishing and Statement Capability Complete
- Produce TBF Format and Content as per the Code Complete
- Notify Retailer of Site Cycle Changes Complete
- Establish Min and Max Billing Period Complete
- Manage Retailer Accept/Reject of Tariff Bill File Complete
- Change Date Presentation to "inclusive – inclusive" Complete
- Receive and Process TBD Transaction Complete

Phase 2 Tariff Billing Event processing and compliance details are noted in the table below. The table was extracted and from the Tariff Billing Code 1.4 and modified to include 2 rows containing event processing capability and Code compliance. With respect to the Process row, a "Y" means

that ATCO Gas will process the event after completion of that phase. "N" means ATCO Gas will not process that event after completion of that phase. Where the event is deemed by the Code to be mandatory (M), a "Y" within the compliance row means ATCO Gas would be in compliance. An "N" means ATCO Gas would not be in compliance with the Code.

Table Ref ID	Tariff Billing Event	Description	Tariff Bill File Event	Tariff Bill Period Event	Usage Period Event	Charge Period Event
1	Regular Bill Cycle	One of the following events has occurred: <ul style="list-style-type: none"> The close of a scheduled bill period has resulted in the generation of estimated usage. A valid meter read spanning 27 days or more and less than or equal to the number of days in the scheduled bill period is received. 	M	M	M	M
		Process Y/N	Y	Y	Y	Y
		Compliant Y/N	Y	Y	Y	Y
2	Enrollment (following initial site creation)	Initial enrollment of a site following site creation, or	N	O	O	O
		Process Y/N	N	N	N	N
		Compliant Y/N	Y	Y	Y	Y
3	Retailer Switch Enrollment (following retailer switch)	Enrollment of a site following transfer of ownership	N	M	M	M
		Process Y/N	N	Y	Y	Y
		Compliant Y/N	Y	Y	Y	Y
4	De-enrollment	The de-enrollment of a site as a result of <ul style="list-style-type: none"> a transfer of ownership, or cessation of ownership (presalvage). 	M	M	M	M
		Process Y/N	Y	Y	Y	Y
		Compliant Y/N	Y	Y	Y	Y
5	Customer Switch	A CSA is sent from a retailer to a distributor as a result of one of the following: <ul style="list-style-type: none"> Customer move in/ move out Retailer terminates a contract for provision of electric services. 	M	M	M	M
		Process Y/N	N	N	N	N
		Compliant Y/N	N (Note1)	N (Note1)	N (Note1)	N (Note1)

Table Ref ID	Tariff Billing Event	Description	Tariff Bill File Event	Tariff Bill Period Event	Usage Period Event	Charge Period Event
6	Missing Site	A site was missing from the original tariff bill file as a result of the following: <ul style="list-style-type: none"> Site withheld from tariff bill file production due to failure of standard content validation test. 	M	M	M	M
		Process Y/N	Y	Y	Y	Y
		Compliant Y/N	Y	Y	Y	Y
7	Accepted Tariff Billing Dispute (most recently billed period)	A distributor presents adjustments as a result of disputed tariff billing information from a retailer for the most recently billed period.	M	M	M	M
		Process Y/N	Y	Y	Y	Y
		Compliant Y/N	Y	Y	Y	Y
8	Accepted Tariff Billing Dispute (prior period)	A distributor presents adjustments as a result of disputed tariff billing information from a retailer for a prior billing period.	O	M	M	M
		Process Y/N	N	Y	Y	Y
		Compliant Y/N	Y	Y	Y	Y
9	Change in Site Status	A change in a site's status has occurred as a result of one of the following: <ul style="list-style-type: none"> Site is energized/de-energized. Site changes to idle. 	N	M	M	M
		Process Y/N	N	Y	Y	Y
		Compliant Y/N	Y	Y	Y	Y
10	MDM Metering Output	A DCM transaction is published by the MDM function.	N	O	M	O
		Process Y/N	N	N	N	N
		Compliant Y/N	Y	Y	N (Note 2)	Y
11	Off-cycle Meter Read	An off-cycle meter read occurs as a result of one of the following: <ul style="list-style-type: none"> Retailer requested. Distributor initiated. Missing / late meter read. Customer supplied. 	N	O	M	O
		Process Y/N	N	N	N	N
		Compliant Y/N	Y	Y	N (Note 3)	Y

Table Ref ID	Tariff Billing Event	Description	Tariff Bill File Event	Tariff Bill Period Event	Usage Period Event	Charge Period Event
12	Equipment Change	One of the following equipment changes has occurred: <ul style="list-style-type: none"> Physical meter change. Meter multiplier change (electricity only). Transformer change (electricity only). Auxiliary device change (gas only) 	N	O	M	O
		Process Y/N	N	N	Y	N
		Compliant Y/N	Y	Y	Y	Y
13	Distribution or Transmission Tariff Price Change (energy based charges)	A distribution tariff price change has occurred affecting energy based charges, having a component basis code of 'E', as a result of one of the following: <ul style="list-style-type: none"> Change in tariff structure. Change in tariff pricing. Addition of a rate rider. 	N	O	M	M
		Process Y/N	N	N	N	Y
		Compliant Y/N	Y	Y	N (Note 4)	Y
14	Distribution or Transmission Tariff Price Change (non-energy based charges)	A distribution tariff price change has occurred affecting non-energy based charges, having a component basis code not equal to 'E', as a result of one of the following: <ul style="list-style-type: none"> Change in tariff structure. Change in tariff pricing. Addition of a rate rider. 	N	O	O	M
		Process Y/N	N	N	N	Y
		Compliant Y/N	Y	Y	N (Note 4)	Y
15	RRT Energy Rate Price Change	An RRT energy rate price change has occurred as a result of the following: <ul style="list-style-type: none"> Changes in regulated rate tariffs. 	N	O	M	O
		Process Y/N	N	N	N	N
		Compliant Y/N	Y	Y	N (Note 5)	Y

Table Ref ID	Tariff Billing Event	Description	Tariff Bill File Event	Tariff Bill Period Event	Usage Period Event	Charge Period Event
16	Rate Code Change	A rate code change has occurred as a result of one of the following: <ul style="list-style-type: none"> ▪ Rate code change resulting from a change in site characteristics. ▪ Light type change. (electric only) ▪ Connect demand change. (electric only) ▪ Tariff contract change. (electric only) ▪ Franchise area change ▪ Profile class change. (electric only) ▪ Mantel count change (gas only) 	N	M	M	M
		Process Y/N	N	Y	Y	Y
		Compliant Y/N	Y	Y	Y	Y
17	Changes to Totalized Sites	The addition or removal of a meter or socket to or from a totalized site.	O	M	M	M
		Process Y/N	N	Y	Y	Y
		Compliant Y/N	Y	Y	Y	Y

Notes:

- 1) ATCO Gas will not be capable of processing a CSA transaction until completion of Phase 3.
- 2) ATCO Gas currently processes usage for billing and DCMs independently. For the DCM process, the CIS business rule is that every validated meter read will be used to generate a DCM. Until Phase 3 is implemented, for the billing process, the CIS business rule is that, at time of billing, the most recent meter reading and the last meter reading that was used in the last issued bill will be used to determine the usage. Although these two processes are slightly different, the two usages are reconcilable with the exception of multi-period DCMs.
- 3) Only reads that qualify for processing using ATCO Gas's current charge cycle process can be used for billing. Please see Note 3 above.
- 4) A DT pricing change is allocated across the scheduled Tariff Billing Period. The usage record is not split for this phase.
- 5) An exemption has been requested for processing an RRT price change.

3.3 - Phase 3 Schedule & Processing Detail

Phase 3 includes processing of CSA transactions. All DCMs will be used for billing. Billing and DCM usage tables will be consolidated to ensure matching usage in billing and associated DCMs. As well, DCM and billing consumption alignment associated with multi-period DCMs will be achieved in this phase. In the event that a DT price change occurs, the usage and charges will be split accordingly. A Tariff Billing Dispute process will be established during this phase and includes rejection, acknowledgement (TDN) and resolution processes in accordance with the Code. This

process may or may not be automated. Performance metrics will be reported after the completion of this phase. A summary of the work is listed below;

- CSA Processing (Customer moves, Contract ends) June 1, 2008
- Report Performance based on Reporting Metrics 3rd Quarter of 2008
- Process all DCMs June 1, 2008
 - Corresponding DCMs for each actual.
- DCM alignment check with Cancel/Rebill if variance >1% June 1, 2008
- TBD Rejection, Acknowledgment (TDN) and Resolution June 1, 2008
- Split Tariff Periods on DT Price Change June 1, 2008
 - Tariff Bill Period Event, Usage Period Event, Charge Period Event

Phase 3 Tariff Billing Event compliance details are noted in the table (extracted from the Tariff Billing Code V1.4) below;

Table Ref ID	Tariff Billing Event	Description	Tariff Bill File Event	Tariff Bill Period Event	Usage Period Event	Charge Period Event
1	Regular Bill Cycle	One of the following events has occurred: <ul style="list-style-type: none"> ▪ The close of a scheduled bill period has resulted in the generation of estimated usage. ▪ A valid meter read spanning 27 days or more and less than or equal to the number of days in the scheduled bill period is received. 	M	M	M	M
		Process Y/N	Y	Y	Y	Y
		Compliant Y/N	Y	Y	Y	Y
2	Enrollment (following initial site creation)	The enrollment of a site as a result of <ul style="list-style-type: none"> ▪ initial enrollment of a site following site creation, or ▪ transfer of site ownership. 	N	O	O	O
		Process Y/N	N	N	N	N
		Compliant Y/N	Y	Y	Y	Y
3	Retailer Switch Enrollment (following retailer switch)	Enrollment of a site following transfer of ownership	N	M	M	M
		Process Y/N	N	Y	Y	Y
		Compliant Y/N	Y	Y	Y	Y

Table Ref ID	Tariff Billing Event	Description	Tariff Bill File Event	Tariff Bill Period Event	Usage Period Event	Charge Period Event
4	De-enrollment	The de-enrollment of a site as a result of <ul style="list-style-type: none"> a transfer of ownership, or cessation of ownership (presalvage). 	M	M	M	M
		Process Y/N	Y	Y	Y	Y
		Compliant Y/N	Y	Y	Y	Y
5	Customer Switch	A CSA is sent from a retailer to a distributor as a result of one of the following: <ul style="list-style-type: none"> Customer move in/ move out Retailer terminates a contract for provision of electric services. 	M	M	M	M
		Process Y/N	Y	Y	Y	Y
		Compliant Y/N	Y	Y	Y	Y
6	Missing Site	A site was missing from the original tariff bill file as a result of the following: <ul style="list-style-type: none"> Site withheld from tariff bill file production due to failure of standard content validation test. 	M	M	M	M
		Process Y/N	Y	Y	Y	Y
		Compliant Y/N	Y	Y	Y	Y
7	Accepted Tariff Billing Dispute (most recently billed period)	A distributor presents adjustments as a result of disputed tariff billing information from a retailer for the most recently billed period.	M	M	M	M
		Process Y/N	Y	Y	Y	Y
		Compliant Y/N	Y	Y	Y	Y
8	Accepted Tariff Billing Dispute (prior period)	A distributor presents adjustments as a result of disputed tariff billing information from a retailer for a prior billing period.	O	M	M	M
		Process Y/N	N	Y	Y	Y
		Compliant Y/N	Y	Y	Y	Y
9	Change in Site Status	A change in a site's status has occurred as a result of one of the following: <ul style="list-style-type: none"> Site is salvaged/removed. Site is energized/de-energized. Site changes to idle. 	N	M	M	M
		Process Y/N	N	Y	Y	Y

Table Ref ID	Tariff Billing Event	Description	Tariff Bill File Event	Tariff Bill Period Event	Usage Period Event	Charge Period Event
		Compliant Y/N	Y	Y	Y	Y
10	MDM Metering Output	A DCM transaction is published by the MDM function.(or equivalent for Gas)	N	O	M	O
		Process Y/N	N	N	Y	N
		Compliant Y/N	Y	Y	Y	Y
11	Off-cycle Meter Read	An off-cycle meter read occurs as a result of one of the following: <ul style="list-style-type: none"> ▪ Retailer requested. ▪ Distributor initiated. ▪ Missing / late meter read. ▪ Customer supplied. 	N	O	M	O
		Process Y/N	N	N	Y	Y
		Compliant Y/N	Y	Y	Y	Y
12	Equipment Change	One of the following equipment changes has occurred: <ul style="list-style-type: none"> ▪ Physical meter change. ▪ Meter multiplier change (electricity only). ▪ Transformer change (electricity only). ▪ Auxiliary device change (gas only) 	N	O	M	O
		Process Y/N	N	N	Y	N
		Compliant Y/N	Y	Y	Y	Y
13	Distribution or Transmission Tariff Price Change (energy based charges)	A distribution tariff price change has occurred affecting energy based charges, having a component basis code of 'E', as a result of one of the following: <ul style="list-style-type: none"> ▪ Change in tariff structure. ▪ Change in tariff pricing. ▪ Addition of a rate rider. 	N	O	M	M
		Process Y/N	N	Y	Y	Y
		Compliant Y/N	Y	Y	Y	Y

Table Ref ID	Tariff Billing Event	Description	Tariff Bill File Event	Tariff Bill Period Event	Usage Period Event	Charge Period Event
14	Distribution or Transmission Tariff Price Change (non-energy based charges)	A distribution tariff price change has occurred affecting non-energy based charges, having a component basis code not equal to 'E', as a result of one of the following: <ul style="list-style-type: none"> Change in tariff structure. Change in tariff pricing. Addition of a rate rider. 	N	O	O	M
		Process Y/N	N	Y	Y	Y
		Compliant Y/N	Y	Y	Y	Y
15	RRT Energy Rate Price Change	An RRT energy rate price change has occurred as a result of the following: <ul style="list-style-type: none"> Changes in regulated rate tariffs. 	N	O	M	O
		Process Y/N	N	N	N	N
		Compliant Y/N	Y	Y	N (Note 1)	Y
16	Rate Code Change	A rate code change has occurred as a result of one of the following: <ul style="list-style-type: none"> Rate code change resulting from change in site characteristics. Light type change. Connect demand change. Tariff contract change. Franchise area change. Profile class change. Mantel count change (gas only) 	N	M	M	M
		Process Y/N	N	Y	Y	Y
		Compliant Y/N	Y	Y	Y	Y
17	Changes to Totalized Sites	The addition or removal of a meter or socket to or from a totalized site.	O	M	M	M
		Process Y/N	N	Y	Y	Y
		Compliant Y/N	Y	Y	Y	Y

Notes:

1) An exemption has been requested for processing an RRT price change.

Appendix A – Accountable Authority

Authority Accountable for Compliance of the Code

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Appendix B - 2.6 – DCM to TBF Usage Alignment (Exemption Request)

ATCO Gas requests an exemption from the Tariff Billing Code Usage Determinant Production Rule 6 which states;

“If a physical meter read (DCM) is allocated into smaller components, the sum of the smaller components must add up to the original usage amount in the DCM, even if they span multiple tariff bill files.”

ATCO Gas cannot meet the above noted production rule when a DCM spans multiple tariff bill periods because each allocated (estimated) usage in the tariff bill will have a different multiplier than that used in the DCM. Similar to the electric model, the multiplier is made up of determinants that are used to calculate usage. To obtain usage, the equation is;

(Current Meter Reading - Last Meter Reading) X Multiplier = Energy Usage

The gas industry is unique in that its multiplier includes a determinant referred to as a heat constant that converts the mass of the gas to a calorific power needed to obtain usage in terms of energy (joules). In accordance with Measurement Canada, ATCO Gas is required to apply a heat constant based on samples that are relevant to the delivered gas. Therefore, ATCO Gas applies a heat constant that is an average of daily samples taken for the entire DCM period.

In tariff billing, when an on-cycle meter read is not obtained, ATCO Gas is required to estimate usage in order to calculate charges. As in the DCM process, ATCO Gas applies a heat constant that is an average of daily samples taken for the entire usage period in the tariff bill (i.e. typical period = 27 to 35 days). As a result, when a DCM spans more than one tariff bill period, the allocated usage will typically be different than that of the DCM.

A recently completed study showed that there is less than a 1% variance between the summed usage in multiple tariff bill periods to that of the relevant DCM for >90% of all on-cycle DCMs. ATCO Gas has investigated numerous options to resolve this issue and has determined that it is not economically viable to link the DCM and tariff bill usage processes to achieve alignment. Although a full cancel/rebill would achieve alignment via re-allocation, ATCO Gas and Direct Energy agree that this is not a customer friendly solution as it would result in thousands of cancel/rebills with little material adjustments to customer bills. It is only when enough meter reads can be obtained that a full cancel/rebill would be acceptable.

Proposed Solution

ATCO gas proposes to build the capability for a conditional cancel/rebill by performing an alignment check based on a +/-1% tolerance when an on-cycle DCM is created. If the usage in a DCM is different by +/-1% or greater than that in the tariff bill, the charges would automatically be cancelled and rebilled. The chosen tolerance results in an acceptable limit to misalignment while minimizing cancel/rebills that would occur where the +/- 1% tolerance was exceeded. The exemption required is long term pending a substantial increase in monthly reads. As stated earlier, when enough monthly reads can be obtained, the tolerance can be reduced or eliminated.

Upon approval from the AEUB, ATCO Gas would implement this functionality along with the remaining Phase III deliverables on the weekend of May 31, 2008.

Appendix C - Summary of Revisions

Date	Item	Change
Sept 10, 2007	2.2	Exemption no longer required
Sept 10, 2007	2.6	Added new exemption request for DCM to TBF Usage Alignment
Sept 10, 2007	3.2	Updated all items to "Complete" FOR Phase 2
Sept 10, 2007	3.3	Updated to new Phase III implementation date.
Sept 10, 2007	Appendix C	Deleted test schedule
Sept 10, 2007	Appendix B and C	Renamed B to C and replaced B with Exemption Request for DCM alignment.
Sept 10, 2007	Table 3.2 and 3.3	Removed Note 2 reference and Note 2 in notes section. No longer relevant.
Sept 10, 2007	Appendix A	Updated authority

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