

March 19, 2024,

Alberta Utilities Commission
Eau Claire Tower
1400, 600 Third Avenue S.W.
Calgary, AB T2P 0G5

Attention: Laura Johnson

**Re: Bulletin 2024-01 – Emergency Billing Relief Program (EBRP)
AUC Consultation on Proposed Rule Development for Emergency Billing Relief**

On February 6, 2024, the Alberta Utilities Commission (AUC or Commission) issued Bulletin 2024-01 and invited feedback on the 2023 Emergency Billing Relief Program (EBRP) and the corresponding EBRP Manual to inform potential development of a new AUC rule regarding an emergency billing relief program for emergency event evacuations.

Apex Utilities Inc. (Apex) is providing its submission both as a natural gas distributor and a default supply provider. Although Apex did not administer the EBRP in 2023, Apex's feedback is based on prior customer evacuation experiences, review of the EBRP Manual, and discussions with market participants.

In general, Apex is of the view that direct monetary support from the Government of Alberta is the most efficient and cost-effective way to provide support to affected customers impacted by evacuations due to natural disasters. This would avoid the administrative complexities involved with a utility-administered program and allow for more timely financial relief to affected customers.

Should the Commission continue to proceed with the development of a rule for emergency billing relief administered by utilities, Apex proposes a daily flat-rate credit be implemented to reduce complexity and administrative burden. This is discussed further, along with additional viewpoints, in the responses below.

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

Apex submits all distribution charges, and energy charges should continue to be eligible for recovery. Distribution charges would need to be recovered by distribution facility owners while energy charges would need to be recovered by retailers, including default supply providers.

Alternatively, Apex proposes that a daily flat-rate credit be selected and implemented to reduce the complexity and administrative burden associated with calculating individual credit amounts for affected customers. These credits would then be eligible for recovery.

In addition to customer credits, system enhancement costs and incremental costs to facilitate the program should be eligible for recovery. For example, labour hours for additional resources or overtime required to facilitate the program should be recoverable.

2. What costs should be excluded?

Apex proposes the exclusion of municipal franchise fees, property taxes, and other governmental charges such as carbon tax from any offsetting credits or the calculation of a daily flat-rate credit. Apex is responsible for remitting any governmental charges calculated and cannot make the determination for the levels of government to avoid these charges.

No components of the issued customer credits should be excluded from recovery by Apex. No incremental costs reasonably incurred by Apex to apply the EBRP should be excluded.

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

Information must be provided from an official government source, such as the Alberta Emergency Alert website. Ideally, it would be an updated and reliable source for mandatory evacuation orders and the lifting of such orders. Having one reliable source of information would provide for a streamlined and consistent application of the EBRP by affected parties.

4. What considerations exist to extend the 2023 EBRP to emergency events beyond wildfires (e.g. floods or other natural disasters)?

Apex is not opposed to the program being extended to other emergency events. However, based on prior experience and to alleviate undue administrative burden, Apex is proposing the following areas be revisited and considered:

- Increase the duration of the evacuation period to 7 calendar days from the current 96 hours. This allows for the credits to be meaningful for those customers in an evacuation situation, and the change from hours to days will eliminate inconsistencies between distributors and retailers.
- Align customer eligibility with the Natural Gas Rebate criteria.
- Adopt a daily flat-rate credit to reduce administrative burden and create a new miscellaneous adjustment code and statement display. This would be reflected in the standard code files for retailers. Please see the response to Question 1 above.
- Exclude all governmental charges from processed credits. Please see the response to Question 2 above.
- Ensure that the Alberta Emergency Alert website is maintained and up to date, for both evacuation orders and the lifting of such orders, or otherwise ensure that utilities have access to reliable official government information for evacuation orders and when they are lifted.

Apex is supportive of a technical meeting or working session with other stakeholders to discuss these recommendations and to identify other opportunities for improvement.

Should the Commission or its staff have any questions or concerns, please contact the writer.

Yours truly,

[Electronically submitted]

Allyn Tan, CPA, CA
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