



Alberta Utilities Commission
1400, 600 3rd Avenue SW
Calgary, Alberta T2P 0G5

March 19, 2024

Attention: Ms. Laura Johnson

RE: Emergency Billing Relief Program – AUC Engage

Please find below the responses of Direct Energy to the AUC's questions on the Emergency Billing Relief Program (EBRP):

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

Direct Energy notes that cost incurred to meet the requirements of section 4.2.1 and section 4.2.2 should be eligible for recovery.

2. What costs should be excluded?

No prudent costs should be excluded.

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

The Government evacuation website should be relied upon for information, but timely updates to the end and start dates of the evacuation periods are critical for the market.

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

The EBRP should be used on a case-by-case basis.

Further feedback:

Direct Energy notes that during the 2023 program, the time lag between the evacuation dates and the application of credits to the consumer was significant. This increased the likelihood that there were timing differences due to natural customer migration.

As a general comment, customers would be better served by direct payments or gift cards provided by the Government during the specific evacuation period instead of the reliance on the EBRP.

Sincerely,

Maria Baitoiu
Manager, Regulatory Affairs