Alberta Utilities Commission

AUC Engage

March 14, 2024

To Ms. Laura Johnson

Please find below the Office of the Utilities Consumer Advocate (UCA) answers to the Emergency Billing Relief Program (EBRP) questions with some additional feedback at the end.

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

The EBR manual does not make it entirely clear what costs are eligible for recovery. This needs to be clarified to avoid confusion. Below follows a list of what parties are expected to do as per the EBR manual, activities which could therefore be interpreted as eligible for recovery.

Page 3 section 4.1.1 (1): DFO’s are to: “Create a tracking form to document evacuation events impacting customers in your service area with the following fields included […].

* Once this form is set-up during the first evacuation event, there should be no additional costs incurred to continue this documentation in years to come. This should be a one- off costs per DFO and can only be eligible for recovery once.

Page 3 section 4.1.1 (2): DFOs are to: “Consider training customer support staff on the program in order to field incoming customer calls and questions.”

* Emergency billing training should form part of the regular training curriculum as well as incorporated in business continuity planning and should not be considered a cost that can be eligible for recovery.

Page 3 section 4.2.1 (1): DFO’s are to do: “Monitoring and tracking of evacuation events.”

* DFOs should monitor and track emergencies and evaluation events as part of their business continuity plan implementation and therefore the costs of doing this should not be eligible for recovery.

Page 3 section 4.2.1 (2-4): DFO’s are to work together with DFOs in overlapping service area’s; provide information on impacted sites and numbers of days evaluated per site to retailers and AESO (electricity only).

* This information should be readily available to be shared through channels of communication that are identified in business continuity plans and should therefore not be eligible for recovery.

Page 4 section 4.1.2.1 (b): DFO will issue a tariff file bill (TBF) and a one-time charge (OTC) credit, either at the same time or within two business days.

* Both TBF and OTC credits are part of normal business for DFO’s and therefore the issuance of these should not be considered a cost that can be eligible for recovery.

Page 5 section 4.1.3 (b): “After the current wildfire season (ending October 31, 2023), distribution utilities can apply to the AUC to recover the billing credits provided to customers. Reasonable costs incurred to administer such credits may be considered on a case by case basis, which must be applied for with sufficient and detailed supporting evidence for the additional administrative costs. The evidence must show that the incremental administrative costs were unavoidable and explain how these costs are not already recovered under existing rates.”

* No administrative costs should be eligible for recovery and only the billing credits provided to customers should be eligible for recovery.

Page 5 section 4.2.1: Retailers are to: “Consider training customer support staff on the program in order to field incoming customer calls and questions.”

* Emergency billing training needs to be part of regular training curriculum as well as incorporated in business continuity planning and should not be considered a cost that can be eligible for recovery.

Page 5 section 4.2.2: Retailers are to use the information from the DFOs to pause bills, cross reference information and issue bills reflecting the emergency period billing credit they receive from the DFO.

* It is believed that this is already part of normal business and as far as it is not, should be incorporated in business continuity plans and therefore not eligible for recovery.

1. **What costs should be excluded?**
* All administrative costs should be excluded from cost recovery, except for the initial set-up of a tracking form (once per DFO).
1. **What is the best source of information regarding evacuations?**
* UCA will defer to others that are in a better position to provide the best source of information regarding evacuations.
1. **What considerations exist to extend the 2023 EPRP to emergency events beyond wildfires (e.g. floods or other natural disasters)?**
* Any emergency events during which customers are evacuated.

**Additional Feedback:**

 The UCA submits the following:

* Page 1 section 2: Improve clarity on customer (site) eligibility by providing a list of sites that are eligible, in addition to the current list of sites that are not eligible.
* Page 5 section 4.2.3 (2): Improve clarity by adding that late fees and penalties are also not pursued.

The UCA thanks the AUC for the opportunity to provide comments about the 2023 EBRP. Please do not hesitate to contact me with any questions or concerns.

With kind regards,

Helene de Beer