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March 19, 2024

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

Re: Bulletin 2024-01 – Alberta Utilities Commission (“AUC or Commission”) consultation on proposed rule development for emergency billing relief

EPCOR Distribution & Transmission Inc. (“EDTI”) comments

1. On February 6, 2024, the Commission issued Bulletin 2024-01 which asked for stakeholder feedback on the 2023 Emergency Billing Relief Program (“EBRP”) to inform potential development of a new rule regarding an emergency billing relief program. EDTI submits this letter in response, and appreciates the opportunity to participate in the Commission’s consultation process.
2. EDTI supports the Commission's efforts to provide relief to customers forced to evacuate as a result of wildfires or other natural disasters, and efforts to look for efficient ways to implement a bill credit in the future. At the same time, EDTI expects that implementing processes and systems updates to implement the program will have an operational and financial impact. In general, EDTI is of the view that should the Commission determine that an EBRP is required in the future, the program (and corresponding rule) should be structured in a manner that is streamlined and minimizes administrative processes to implement and operate the program, while providing the intended billing relief to customers in a reasonable and timely manner. EDTI also sees merit in an approach where the government provides direct billing relief to customers impacted by evacuation events, as this approach may reduce the overall administrative requirements of the program.
3. In 2023, EDTI was not required to implement the EBRP as there were no evacuations as a result of wildfire within EDTI’s Distribution Facility Owner (“DFO”) service territory during the course of the year. Given that FortisAlberta and ATCO have recent experience implementing, operating and consulting on the EBRP, EDTI is of the view that the positions and observations put forth by those utilities provide important considerations for any future EBRP changes.
4. EDTI’s responses to the specific questions posed by the AUC are provided below.

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

Currently the EBRP Manual states in 4.1.3(3):

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.

EDTI submits that the following would qualify as “reasonable costs”:

- Administrative costs to set-up and operate the program (e.g., additional resourcing to facilitate the program, tracking, reporting, etc.);
- IT system costs (e.g., cost to develop, implement, automate and maintain the solution/systems); and
- Relief rebates or credits amounts provided to eligible customers as a result of the EBRP.

- **What costs should be excluded?**

Any costs that relate to regular DFO operations should be excluded from the recovery of utility costs related to the emergency billing relief program.

- **What is the best source of information regarding evacuations?**

To ensure that the information utilized by utilities for an EBRP is accurate, reliable and up-to-date, EDTI recommends that information should be provided by an official government entity or source (e.g., the Alberta Emergency Alert (“AEA”) website). EDTI also recommends that an expedited mechanism be established with the government so that utilities can quickly resolve any potential site or customer discrepancies (e.g., customer/sites impacted but not reflected in government provided information).

EDTI does not recommend any solution where utilities are required to seek out informal sources of information regarding evacuations.

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

Given that Section 3 of the Manual already identifies that a mandatory evacuation order be stated on the AEA website for greater than 96 hours in order to qualify for the program, EDTI believes that the EBRP could be amended such that it is clear that it applies to events beyond wildfires. For example, the Manual could provide a generic statement that the applicable events are those where a significant population is displaced, without the need to list specific events (e.g., wildfires, floods, severe weather, etc.).

- **Additional EDTI comments:**

In order to administer the EBRP, EDTI expects that changes to its systems and processes will be required. At a high-level, a program of credits to certain customers, at specific sites will almost certainly result in manual processes to implement, and enter corrections and system changes. These processes are time consuming, costly and would require additional resources to manage the program.

In addition to the above comments, EDTI submits that the Manual would benefit from the following additions or clarifications:

- Event trigger ownership. When an emergency event is eligible to trigger the directions from the Manual, the Government of Alberta should own announcing that the event qualifies for an emergency billing relief credit.
- The eligibility timeframe. EDTI believes that a timeframe longer than 96 hours should be considered. From EDTI's point of view, this would reduce the amount of manual effort to focus its abilities to provide relief to a clearer list of customers experiencing hardship.
- The methods to determine eligibility. EDTI foresees difficulty and inconsistency in tracking and administering to select sites. The Government of Alberta source of truth needs to be clear and always up-to-date.
- Transaction communication between DFO and Retailer under Rule 021. It would be helpful if, for example, a new standard code for tracking and DSR type was created. It would allow for swift transactions and tracking across industry to be more consistent for impacted dropped sites.
- Adopting a daily flat credit rate to reduce administrative burden. EDTI strongly agrees with FortisAlberta's recommendation to adopt a consistent, daily flat credit. This would provide consistent customer treatment, reduce system customization time/cost, manual tracking effort and risk of human error.
- Clarify Tariff and Distribution charges. The Manual uses Tariff charges which would encompass all the charges that were sent out on the Tariff Bill File (TBF), but in other places states distribution

charges, which wouldn't apply to the transmission charges. EDTI currently assumes all the tariff charges would be sent on a TBF.

5. Please call me directly at (780) 412-3799 if you should have any questions or concerns with respect to this submission.

Sincerely,

[Electronically Submitted]

Teresa Crotty-Wong
Director, Regulatory Affairs & Business Planning
EPCOR Distribution & Transmission Inc.

Attachments