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March 19, 2024

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

**Attention: Ms. Laura Johnson**

**Re: EPCOR Energy Alberta GP Inc.  
AUC Emergency Billing Relief Program – Stakeholder Feedback**

1. On February 6, the Alberta Utilities Commission (“AUC” or “Commission”) released Bulletin 2024-1<sup>1</sup> (“Bulletin”). The Bulletin outlined the AUC’s initiation of stakeholder consultation to incorporate requirements for emergency billing relief into a new rule to provide predictability and transparency for stakeholders. The Bulletin included a request for industry participants to provide their feedback on a list of questions and comments on the AUC’s August 14, 2023 Emergency Billing Relief Program (“EBRP”) Manual (“Manual”) by March 19. EPCOR Energy Alberta GP Inc. (“EEA”) on behalf of 1772387 Alberta Limited Partnership (“Encor by EPCOR”) and on its own behalf, is providing comments, responses and suggestions in this letter and the attached table for the Commission’s consideration.
2. Overall, EEA supports the development of a new rule to ensure a consistent approach to addressing emergency events. EEA acknowledges the rule development process will take some time and recommends the AUC use industry participant’s feedback to update the Manual for use in the short term and target the development of a new rule to be ready in time for the 2025 Alberta wildfire season. EEA understands the AUC may need to facilitate industry consultation meetings to provide opportunity for industry participants to contribute through more in-depth discussion on their submissions when drafting a new rule and we will be full participants in such a consultation.
3. EEA has provided its feedback on AUC’s four questions (Q1 to Q4) as listed on the AUC’s engage site.
4. Q1 - What costs should be eligible for recovery as part of an emergency billing relief program?

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<sup>1</sup> AUC Bulletin 2024-1: AUC Consultation On Proposed Rule Development For Emergency Billing Relief

A1 - EEA proposes the following retailer costs should be eligible for recovery as part of an emergency billing relief program:

- Reasonable retailer system changes to enable tracking of the credits applied: retailers will need to make system changes in order to apply the Alberta Energy System Operator (“AESO”) energy credits if the credits are not sent through a Tariff Bill File (“TBF”). In addition, retailers would need to set up their systems to enable reporting of any credits that are sent through TBFs.
- Reasonable costs incurred to administer the program.
- EEA proposes the rule should specify how to make the retailer whole, if retailers will be expected to credit consumption at the rate the customer was billed.

5. Q2 - What costs should be excluded?

A2 - EEA proposes that costs related to communication to customers should be excluded. Similar to other Government of Alberta (“GOA”) programs, EEA proposes the AUC be the primary source of communication by responding to media regarding the program details as well as providing Frequently Asked Questions (“FAQs”), a Fact Sheet, and updating their external website with information on each billing relief incident. Retailers can then use the Fact Sheet, FAQs and details on the AUC website to develop messaging for their staff and can point customers directly to the AUC’s website if required. EEA customer care will be able to speak to individual customers about their accounts as we support the GOA program.

6. Q3 - What is the best source of information regarding evacuations?

A3 - In EEA’s view, the best source of information regarding evacuations should be the GOA website.

7. Q4 - What considerations exist to extend the 2023 EBRP to emergency events beyond wildfires (e.g. floods or other natural disasters)?

A4 - EEA proposes the following considerations to extend the 2023 EBRP to emergency events beyond wildfires:

- A general definition of what an emergency event is and parameters around the types of events that will be eligible for emergency billing relief should be included under the Definitions section of the rule, and should extend beyond wildfires. EEA proposes that when an emergency event meets the criteria defined in the rule, that the GOA/AUC send

out a public bulletin to announce that the event qualifies for an emergency billing relief credit.

- The 2023 EBRP did not provide for energy credits for eligible natural gas sites in addition to the TBF credits. EEA proposes that the rule specify situations where natural gas sites will receive energy billing relief credits.

8. EEA submits in addition to this letter, the attached Table 1 which shows sections of the 2023 EBRP Manual and EEA's comments.

9. We know that any emergency event requiring emergency evacuations impacts individuals, families and communities. EEA wants to support the delivery of a process for emergency billing relief that is efficient, accurate and timely. Should you have any questions, please contact me at [tforbes@epcor.com](mailto:tforbes@epcor.com) or [EPCORretailrep@epcor.com](mailto:EPCORretailrep@epcor.com).

Sincerely,

*[Electronically Submitted]*

Tammy Forbes  
Senior Manager, Stakeholder Relations (Acting)  
EPCOR Energy Alberta GP Inc.

**Table 1. EEA Comments AUC Emergency Billing Relief Program Manual August 14, 2023**

AUC Emergency Billing Relief Program Manual		EEA Comments
Section	Details in the Manual	
1 & 2: Introduction and Customer (site eligibility)	<p>To balance the intention of targeting this group with administrative and practical considerations, owners of electric distribution systems and gas distribution systems (DFOs) will apply the following criteria to identify site eligibility.</p> <p>This program applies to residential, farm, irrigation and small commercial rate class sites that consume less than 250,000 kilowatt hours of electricity per year and to residential, farm, small commercial or other natural gas customer sites that consume less than 2,500 gigajoules per year (based on the most recent 12 months of historical usage data prior to the event occurrence), with some exceptions. Specifically, sites within the following rate classes are not eligible for this program:</p> <ul style="list-style-type: none"> <li>(a) streetlights rates</li> <li>(b) flat metered rates</li> <li>(c) oilfield rates</li> <li>(d) transmission connected rates</li> <li>(e) sites associated with SIC codes representing oilfield, mining, gas processing or other industrial classifications (if available)</li> </ul>	<ul style="list-style-type: none"> <li>• Agree that DFOs/Distributors/DSO/Wires owner should be responsible for determining eligible sites and providing retailers with the list</li> <li>• Agree that RRO and competitive sites should be eligible.</li> <li>• Agree to exemption list.</li> <li>• EEA proposes that the rule should also address whether they are eligible and how to treat eligible micro-generation sites.</li> <li>• Natural gas sites received D&amp;T billing reliefs but not the energy portion so EEA proposes that the rule should clarify situations where natural gas sites will be qualified for energy billing relief and if so who will be responsible to provide the energy credit.</li> </ul>
3: Included evacuation events and calculation of the billing-relief period	<p>(1) Be a mandatory evacuation order as stated on the Alberta Emergency Alert website <a href="https://www.alberta.ca/alberta-emergency-alert.aspx">https://www.alberta.ca/alberta-emergency-alert.aspx</a></p>	<ul style="list-style-type: none"> <li>• EEA agrees that this website will be the best source of information on evacuations.</li> </ul>
	<p>(2)</p> <p>(b) For eligible sites that were subject to more than one mandatory evacuation order, if less than 96 hours pass between the issuance of the evacuation orders, the period from the day of the issuance of the first evacuation order to the day of the lifting of the last evacuation order (inclusive) will be considered the evacuation billing-relief period.</p> <ul style="list-style-type: none"> <li>• In a situation where the evacuation order was lifted, and tariff billing was not received during the evacuation order period, all distribution charges and associated AESO charges during the billing-relief period will be credited.</li> <li>• In a situation where the evacuation order remains in effect, tariff billing and associated AESO charges for this entire period would be suspended. Any associated billing credit to be presented on a customer bill as a single billing-relief period.</li> </ul>	<ul style="list-style-type: none"> <li>• (2) (b) EEA supports this as it simplifies the process for all parties.</li> <li>• (3) This is preferable as it will ensure consistent evacuation periods.</li> </ul>

	(3) DFOs are expected to communicate with each other to best ensure the billing-relief periods applied to each eligible site within their overlapping service areas will be aligned among them.	
4.1.1 At the start of an evacuation event	(1) Create a tracking form to document evacuation events impacting customers in your service area with the following fields included, at minimum: (a) Site ID, (b) Retailer ID, (c) Retailer name, (d) Evacuation start date, (e) Evacuation end date (if known), (f) Total number of days evacuated (if end date is known, otherwise status shows as in progress).	<ul style="list-style-type: none"> <li>• EEA supports this. With respect to (f), EEA proposes that the rule should specify that both the evacuation start and end dates are inclusive when counting the “Total number of days evacuated (if end date is known...)”.</li> </ul>
4.1.2 During and at the end of an evacuation event	(3) Provide to each retailer of record the list of sites applicable to that retailer of record. Provide any updates regarding site or evacuation status to the applicable retailer of record within five business days of the update being known.  (4) Provide to the Alberta Electric System Operator a list of sites impacted by the evacuation order(s) and the total number of days evacuated by site (electric DFOs only).	<ul style="list-style-type: none"> <li>• EEA supports this. For the 2023 billing relief, EEA found sites where EEA received AESO credits but did not receive the applicable D&amp;T credits and vice versa. EEA was informed that the difference was due to retailer switches.</li> <li>• To avoid this from occurring, EEA proposes that DFOs review and reconcile the details in the list that is shared with retailers and AESO to ensure they are the same so that the retailer who owns the site receives both the AESO and D&amp;T credit for the days they are the retailer of record per Rule 004 and Rule 021/028 requirements.</li> </ul>
4.1.2.1 Calculation and administration of billing relief	(b) Upon the lifting of an evacuation event plus 96 hours, for each eligible site each DFO will either: (i) Issue only a single tariff bill file (TBF) using their ability to suspend billing, and provide a one-time charge (OTC) credit offsetting the portion of the bill that pertains to the evacuation event. The TBF should include a separate line item showing the billing-relief period and billing-relief amount (under the OTC field), when applicable. OR (ii) First issue a TBF with original charges, and within two business days, issue a TBF with an OTC credit offsetting the distribution tariff charges included in the previous TBF that pertains to the evacuation event.	<ul style="list-style-type: none"> <li>• EEA supports (i) on the understanding that DFOs will send a TBF with the consumption with a period that includes the date in the OTC record. EEA proposes that the OTC credit date should be set to the Evacuation end date or a date within the evacuation period to ensure the retailer who owns the site during the evacuation period receives the OTC. This will also ensure retailers can automatically apply the OTC to the customer who is in service during the evacuation period.</li> <li>• EEA proposes the addition of language with examples on how to calculate the Total number of days evacuated under Section 4.1.1. (1) (f) above.</li> </ul>
4.1.3 Following an evacuation event	(1) For 2023 ----- (a) If site has been destroyed: <ul style="list-style-type: none"> <li>• For these cases, and as per normal processes, no billing should be issued for these sites. Additionally these sites should not be allocated energy in load settlement on a go forward basis.</li> </ul> (b) If site has not been destroyed, and the evacuation order has been lifted and 96 hours have subsequently passed without a further evacuation:	<ul style="list-style-type: none"> <li>• EEA supports (1) (a) and (b). EEA proposes that in addition to DFOs including destroyed sites in the list, the rule should specify that DFOs send unsolicited de-energize completion (“DEC”) and site metering characteristics (“SMC”) transactions for destroyed sites. This will ensure that the transactions and billing aligns per Rule 021/028 and 004 requirements.</li> <li>• EEA proposes the rule addresses how to treat eligible micro-generation sites. What type of</li> </ul>

	<ul style="list-style-type: none"> <li>For these cases, the circumstances trigger the issuance of a billing credit as per Section 3 of this manual. DFOs are to send a TBF showing the OTC credit for these sites as soon as possible and the retailer of record is to include that credit in their next billing cycle.</li> </ul>	<p>transactions should be sent to notify retailers that the micro-generation is active or not?</p>
<b>4.2 Retailers</b>		
4.2.1 Before an evacuation event	Consider training customer support staff on the program in order to field incoming customer calls and questions.	<ul style="list-style-type: none"> <li>No concerns. EEA recommends AUC create a fact sheet and FAQ for each event as well as update the AUC website to reflect this, which will enable retailers to use the applicable fact sheet for training, agent communication and as an information resource for customers.</li> </ul>
4.2.2 During and at the end of an evacuation event	(1) Receive and store evacuation lists from the DFOs for which you are a retailer of record.	<ul style="list-style-type: none"> <li>EEA recommends that the rule should specify approximate timelines for DFOs to send out the list.</li> </ul>
	(2) For sites identified in the evacuation list: (a) Pause normal bill issuance processes until a TBF with the associated billing credit amount is received.	<ul style="list-style-type: none"> <li>Retailers should be allowed to issue a customer bill when retailers receive the TBFs for other charges and/or TBFs with associated billing credit. Pausing billing until associated billing credit amount is received will result in billing delays especially if DFOs have not paused billing. EEA proposes that the rule should specify that retailers should follow their normal billing practices and Rule 004 when they receive TBFs, as EEA's understanding is that DFOs will follow the requirements under Section 3 of the program manual (which will be included in the rule) to determine evacuation events and calculation of the billing relief period.</li> </ul>
	(2) ----- (b) Use the TBF with the billing-relief credit and a credit of AESO charges to create a customer bill for the billing period, including the billing-relief period and billing relief credit.	<ul style="list-style-type: none"> <li>Based on the processes, retailers would normally receive the AESO credit several months after the D&amp;T credit TBF so EEA proposes that the rule should be written to allow retailers to invoice any of the credits (TBF or AESO) as and when retailers receive the credit according to Rule 004 requirements and the retailer's billing practices. Pausing billing until both the AESO credit and D&amp;T credit are received will result in billing delays for customers. It will also have a financial impact on retailers, as it means retailers would have paid DFOs while delaying invoicing customers would result in delays as to when retailers can receive payment.</li> <li>As DFOs will send the D&amp;T credit as a one-time credit, and retailers need to reflect the energy (AESO) credit as an adjustment, retailers are not able to show the specified description on the invoice for both the AESO and D&amp;T credit. EEA could not show the billing relief period on the bill for the D&amp;T credit because EEA has to align to Rule 004 requirements for OTC. Retailers should be allowed</li> </ul>

		<p>to use other options such as bill message, agent training and messaging to explain the billing-relief period, etc. to customers.</p> <ul style="list-style-type: none"> <li>• EEA proposes the following for the AESO Credit: <ul style="list-style-type: none"> <li>○ Specify when retailers should expect the AESO credit, how the AESO will determine the consumption for the billing relief period, and the pool price that the AESO will use. Specify the rate that both RRO providers and competitive retailers should use to determine the energy credit for customer invoices.</li> <li>○ Specify how AESO will show the credit on their AESO invoices. EEA proposes that the AESO must notify the retailer by email when they send the AESO credit. EEA recommends that AESO should upload a template of the file it will send to retailers on the AUC website under the “Related Information (Forms, Templates and Reference Materials)” section of the rule.</li> <li>○ Specify in the rule that the AESO credit or energy credit does not apply to natural gas. Reiterate that natural gas sites will only receive the D&amp;T credit.</li> </ul> </li> <li>• EEA proposes that AESO explore uploading the list of evacuated sites that will receive the credit on their website so retailers can pull the list at the same time that retailers are pulling their invoice to eliminate manual processes of sharing the list through emails to retailers.</li> </ul>
	<p>(2)  (c) Ideally, retailers will present the billing-relief period and billing-relief credit as a separate line item or text within the relevant customer bill titled “Evacuation period billing credit.” Alternatively, retailers are encouraged to clearly explain these onetime credits to their customers using their preferred communication method.</p>	<ul style="list-style-type: none"> <li>• EEA was able to present each one-time credit (D&amp;T and energy) as a separate line item. For the AESO credit, EEA was able to show the billing period for the credit, consumption and \$ amount.</li> </ul> <p>D&amp;T One Time Credits:</p> <ul style="list-style-type: none"> <li>• Based on current billing practices and Rule 004 requirements, the line item description is based on the respective DFO standard code. The use of existing standard codes in 2023 such as FortisAlberta: 0320 “CR Misc Fee and ATCO Gas/Electric: MA “Miscellaneous Adjustment” caused confusion as these were existing standard codes and can be used for other purposes by DFOs. EEA had to reach out to the DFOs to confirm some of the credits.</li> <li>• EEA proposes that the rule should require DFOs to use a new standard code with the preferred description, such as “Evacuation period billing</li> </ul>

		<p>credit”. DFOs can use this new standard code for emergency billing relief credits only.</p> <p>Energy Credits:</p> <ul style="list-style-type: none"> <li>• Currently passing on AESO credits to customer invoices is outside Rule 004 requirements. EEA had to use manual processes and a system approach to pass on the AESO credits to customer invoices. Based on current billing practices, EEA is only able to show the credit as a “cancel” under the Adjustments section. EEA was able to show billing period (provided by AESO), consumption (provided by AESO) and the total credit (which is AESO pool price multiplied by the AESO consumption also provided by AESO). EEA proposes that retailers should be allowed to show this as they deem fit and should be allowed to use agent training and messaging to explain the credit to customers.</li> <li>• EEA proposes that the AUC review and consider whether DFOs should pass on the AESO credits through TBFs. Doing this will ensure retailers receive the credits through established processes, at the same time as the D&amp;T credits and allows retailers to use automated processes to apply the credits and show both on the same customer invoice. To support this, a different standard code could be used to differentiate between the D&amp;T and AESO credit or all credits flow through the same standard code and retailers use agent training and messaging to explain the credits to customers.</li> </ul>
	<p>(3) In anticipation of potential customer inquiries, retailers are encouraged to cross-reference the list of impacted sites with unsolicited de-energization requests issued by DFOs for affected sites (unsolicited de-energization requests may come through in response to an emergency order from local authorities).</p>	<ul style="list-style-type: none"> <li>• EEA proposes this correction: - cross reference list of impacted sites with unsolicited de-energization completion transaction issued by DFOs----</li> <li>• EEA proposes that DFOs should follow Rule 021 and 028 requirements for sending DEC transaction and accompanying SMC in safety and emergency situations to the retailers when DFOs confirm destroyed sites. This will ensure both retailers and DFOs are using current practices related to Rule 021/028 and Rule 004</li> <li>• As DFOs may not be able to confirm destroyed sites for some time, DFOs and retailers may need to agree to some manual processes.</li> </ul>
	<p>(4) Issue the bill.</p>	<ul style="list-style-type: none"> <li>• EEA proposes the rule should specify that retailers follow their standard billing practices and Rule 004 requirements to issue a customer bill. See applicable sections above.</li> </ul>
	<p>(5) Do not issue any new de-energization requests or new de-enrollment requests for sites included in an evacuation list from a DFO.</p>	<ul style="list-style-type: none"> <li>• EEA supports this. However, EEA would like to state that it would depend on when retailers would receive the list from DFOs. If impacted customers</li> </ul>

		reach out to retailers to request de-energization or de-enrollments before retailers receive the impacted site list from DFOs, then retailers should be allowed to proceed to submit the appropriate transactions.
	New Item (6) Add new item on retailer administration fees	<ul style="list-style-type: none"> <li>• EEA proposes the rule should propose language for retailers to consider with respect to administration fees.</li> </ul>
4.2.3 Following an evacuation event	(1) Keep track of all billing-relief credits provided and associated calculations	<ul style="list-style-type: none"> <li>• This will require system changes and manual processes for retailers. EEA proposes that retailers should be allowed to make the necessary system changes and apply for reimbursement of reasonable system change costs and other costs to administer the program.</li> <li>• EEA had to reconcile the list from AESO to the list from the electricity DFOs to ensure EEA has received all one-time AESO credits for applicable sites. During this reconciliation, EEA found some sites on the AESO list, but were not on the DFO list and vice versa. The DFOs explained the discrepancy was a result of customer switches.</li> <li>• EEA proposes that the DFOs and AESO review and reconcile to ensure the sites on both the DFO and AESO list matches. Or as proposed above, DFOs should send the AESO credits through TBFs for retailers. This ensures retailers would receive both the D&amp;T credit and the AESO credit for all applicable sites.</li> </ul>
	(2) For 30 days after the end of a billing-relief period, retailers are encouraged to not pursue credit collection, de-energization or de-enrollment of outstanding amounts for impacted sites.	<ul style="list-style-type: none"> <li>• EEA supports this.</li> </ul>
4.3 The AESO	<p>The AESO will provide credits to off-set the charges it issues to retailers and recover the cost of the credit through the AESO energy market trading charge, following the practice utilized for previous evacuation events.</p> <p>Additional notes on AESO Credits sent through email:</p> <ol style="list-style-type: none"> <li>1. AESO pool prices will be used in calculating the credits for all sites (including sites on the RRO).</li> <li>2. The AESO will provide credits based on a daily average pool price based on the WSD (daily) data.</li> <li>3. Distributors will still be required to provide the AESO with the list of sites and the days that each site was evacuated.</li> <li>4. The AESO will then calculate a credit based on the average daily pool price for each day multiplied by the daily kwh+losses+UFE indicated in the WSD (daily) data.</li> <li>5. The AESO will provide retailers with the total credit amount for each Site ID.</li> </ol>	<ul style="list-style-type: none"> <li>• EEA proposes the following for the AESO Credit: <ul style="list-style-type: none"> <li>○ Specify the timeline when retailers should expect the AESO credit, how AESO will determine the consumption for the billing relief period and</li> <li>○ Specify the calculation method that the AESO will use to determine the energy credit that will be provided on the AESO bill and how that credit should be provided to customers for both RRO providers and competitive retailers.</li> <li>○ AESO should upload a template of the file they will send to retailers on the AUC website under the Related Information (Forms, Templates and Reference Materials) section of the rule</li> <li>○ Specify how AESO will show (i.e. description of the line item) the credit on their AESO invoices. Since retailers regularly pull the AESO invoice from the</li> </ul> </li> </ul>

		<p>AESO portal, the rule must specify that AESO must email the retailer the file with the list of sites, billing relief details, etc. when they apply the AESO credit on the invoice.</p> <ul style="list-style-type: none"><li>○ Specify in the rule that there are no energy credits for natural gas sites. Basically natural gas sites will only receive the D&amp;T credit</li><li>• See additional information above on proposal to have DFOs send the AESO/energy credits through TBFs and AESO considering uploading the list of files to the portal so retailers can pull the list when they view invoices.</li></ul>
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