

AltaGas Utilities Inc. Tariff Billing Code Compliance Plan

1. Role of AltaGas Utilities Inc.

- AltaGas Utilities Inc. (AUI) provides gas distribution service to approximately 70,000 customers in Alberta. AUI's customers are generally located in towns and rural areas. AUI's service territories are spread over a geographic area spanning approximately 1,100 kilometres north to south and 600 kilometres east to west.
- AUI also performs the default supply provider functions under its default rate tariff for customers who have not signed retail gas contracts or who do not perform gas services on their own.
- AUI's Tariff Billing Code (TBC) solution will not provide Tariff Billing Files (TBFs) from AUI as gas distributor to itself as default supply provider.

2. Awareness and Understanding of the Code

- AUI's TBC project team consisting of Billing and Information System and Technology staff have read Rule 004; TBC and fully understand the obligations required to comply with the Code.

3. Intent to Comply with the Code

- AUI intends to comply with all of the obligations defined in Rule 004 Section 2.
- AUI intends to comply with the processes and transactional requirements defined in Rule 004 Sections 3, 4 and 5 with the following exceptions that will not be part of the initial deployment of AUI's TBC solution:
 - Section 5.4.1 – (2): Request for exemption for inclusion of all cancel/rebill tariff charges in a single TBF for all cancel/rebill instances. AUI's current system does not have a mechanism to perform an all inclusive one-step cancel/rebill. AUI will in its best effort ensure that cancels and rebills are presented in a single TBF by initiating a manual process to hold presentation of cancel and rebill charges from a tariff bill file for a site until the cancel and rebill process is complete. This may take one or more days depending on the number of billing periods that require correction. In some instances, cancel or rebill records may be released in one or more tariff bill files for the site in advance of the completed cancel and rebill process; however, all records released will be in sequential order of the cancel and rebill events. Additionally, where the cancel and/or rebill process is not completed prior to a site's schedule tariff bill file publish date, tariff billing information for that site will be withheld from presentation until the cancel and rebill process has

completed. AUI is looking at addressing this issue in conjunction with version 3 of our current CIS system. This is slated for development starting in 2012.

- Table Ref ID 14 of Table 3-1: Request for exemption for the requirement to split charges when there is a distribution price change (non-energy based). When a Franchise Tax (Rider A) or a Property Tax (Rider B) rate change occurs within a current billing period, AUI's current TBC solution is not capable of applying the applicable franchise tax or property tax rate to the charge periods before and after the rate change; instead, both periods will be applied the same rate. The TBC solution will utilize the Franchise Tax and Property Tax rates effective at the end of the current billing period. This rate will apply to all tariff bill periods within the current billing period regardless of whether a Franchise Tax or Property Tax rate change occurred during the billing period. AUI projects that a solution will be in place to address this issue by the end of 2011.
- Rule 004, Section 4.3.1 - #4 & Section 5.4.1 - #1: Request for exemption for separation of cancel / rebill tariff charges and cancel / rebill one time charges. AUI is requesting an exemption for the separation of tariff-based cancel / rebill charges and one-time cancel / rebill charges. The current solution does not adhere to the TBC obligations around TBF cancel / rebill production and the separation of tariff versus one-time charges. All charges, both tariff and one-time charges, will appear on the same TBF for a specified site and period. If a tariff or one-time charge needs to be subsequently cancelled and rebilled, then both tariff and one-time charges are cancelled, rebilled and presented on the same TBF. One example TBF is attached to show this representation for all charges in one TBF as is AUI's current solution. This will be the representation all retailers will see. AUI may also correct a previously billed OTC (one-time charge) by using a net difference representation in a subsequent TBF. This approach will be used when a OTC that was presented in a TBF several months prior needs to be cancelled and rebilled and there is no change in retailer or customer since the original charges were incurred. This approach will be used to avoid performing a cancel / rebill of all tariff charges back to the period in which the one-time charge occurred. In this scenario, a net difference for the OTC will be presented on the next on-cycle TBF for the site and the date will reflect a date within the current billing period (as opposed to the date of the original charge being adjusted). AUI is looking at addressing this issue in conjunction with the version 3 build of our current CIS system. This is slated for development starting in 2012.
- Rule 004 – Section 3.2 Table 3-1 (15): A mandatory split of usage is required when a RRT energy price occurs. For sites that are Idle, a DU record will not be split when there is zero usage. For sites that are De-energized a DU record and a CH record will not be presented when there is zero usage. AUI is requesting an exemption for the split of the DU record when a site is Idle or De-energized and there is no usage during the Tariff Bill Period.

4. Self-Certification Statement

- AUI will complete Distributor Stand Alone testing by May 14, 2010 with a go-live date of June 26, 2010.
- AUI will provide Self-Certification signoff three months after Code implementation.

5. Accountability for Compliance Plan

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