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August 12, 2024

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

Re: Rule 016 Review of Commission Decisions – Comments from EPCOR Distribution & Transmission Inc.

1. EPCOR Distribution & Transmission Inc. (“EPCOR”) submits these comments in response to the Alberta Utilities Commission’s proposed amendments to AUC Rule 029.

Section 4:

2. Section 4.1 provides a variety of permissible methods to provide notice of an application for approval of a franchise agreement but does not provide any guidance on the duration of the notice period. A review of past Commission decisions which have approved franchise agreements suggests that notice periods vary from approximately 20 to 90 days.¹

3. In order to provide clarity around process, EPCOR suggests that Rule 029 provide a minimum notice period of no less than 21 days. This duration allows parties sufficient time to review the application materials but also allows for the efficient processing of applications.

Sincerely,

[Electronically Submitted]

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

¹ See 28651-D01-2023 (20 days’ notice); 26284-D01-2021(47 days’ notice); 25303-D01-2020 (51 days’ notice); 27796-D01-2022 (90 days’ notice).