

To whom it may concern:

The Utilities Consumer Advocate (UCA) has completed its review of the Rule 029 Draft Amendments, and requests that the following concerns be noted for inclusion in the rule.

The UCA submits that the Rule 029 draft should be further amended to include the definition of a Local Access Fee, and to have reference to Local Access Fees where necessary and applicable, alongside any references to Franchise Fees. In addition, the UCA proposes including reference to Municipal Consent and Access Agreements in addition to, and alongside Franchise Agreements where necessary. The UCA's rationale stems from the fact that the City of Calgary's annual reporting clearly differentiates between monies collected from Local Access Fees, and those collected from Franchise Fees (electricity and natural gas respectively). Also, electricity agreements are referred to as Municipal Consent and Access agreements, while natural gas agreements are referred to as Franchise Agreements.

The inclusion of these terms in the Rule would provide much needed clarity and consistency in how these terms are referred to and understood across organizations. Furthermore, having concise language in the rule will promote further accuracy and transparency in evaluating the fair and reasonable collection of these fees from utility consumers.

Thank you in advance for your time and consideration of the above.

***Office of the Utilities Consumer Advocate***