



2000 – 10423 101 Street NW
Edmonton, Alberta T5H 0E8 Canada
epcor.com

September 4, 2024

Submitted on AUC Engage

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

Re: Bulletin 2024-16 – Alberta Utilities Commission (“AUC or Commission”) consultation on improvements to rates proceedings for transmission utilities

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

1. On August 20, 2024, the Commission issued Bulletin 2024-16 seeking feedback to improve the effectiveness of rates proceedings for transmission utilities. EDTI submits this letter in response and appreciates the opportunity to participate in the Commission’s consultation process.

2. For the AUC Round Table discussion on September 12, 2024, EDTI intends to discuss the topics below.

- **Timing and coordination of upcoming general tariff and rate applications to support adequate resourcing, avoid delays and ensure predictable and consistent AUC processes.**

EDTI intends to file its 2026-2027 Transmission General Tariff Application on June 30, 2025. EDTI appreciates the need to ensure adequate resourcing for all parties, and is willing to coordinate with other utilities if this date poses a conflict. EDTI’s limitations are a filing date no earlier than June 30, 2025 and not to extend more than 60 days later (August 29, 2025). Further, EDTI recommends that a process schedule for all TFO tariff applications be established early in the fourth quarter of 2024.

- **Process improvements that could improve efficiency and outcomes of negotiated settlement processes.**

EDTI strongly supports the negotiated settlement process and believes clear and concise issues lists and short negotiation periods (two weeks, placed at an appropriate point in the overall proceeding schedule) will drive efficiency and focussed efforts.

- **Extending and standardizing test periods (three years or longer) for all utilities.**

The determination of the appropriate duration of an applicant's test period should remain with the utility applicant. The burden of proof to demonstrate that a tariff is just and reasonable lies with the utility; the onus is upon the applicant to demonstrate the timing, scope and prudence of its application, and the duration of the test period should be at its discretion. Utilities hold the situation- and time-specific knowledge that informs the timing of their applications and test period duration, in terms of both internal drivers (e.g. resources, capital programs, operating and maintenance requirements, concurrent applications, business planning activities), and external considerations (e.g. market considerations, electricity transition, climate change, supply chain).

- **Establishing materiality thresholds for capital:**

EDTI supports a review of materiality thresholds for capital programs. Specific recommendations will require further consultation to thoroughly investigate and review the potential for efficiency gains. At a minimum, EDTI believes that existing thresholds should be updated to reflect inflation.

- **How and where the materiality threshold(s) should be applied, and appropriate time periods for applicability**

Further consultation is required.

- **The potential for different threshold(s) for re-occurring programs versus new programs, and**

EDTI agrees different threshold(s) should be considered for re-occurring programs, which have been tested through previous applications, versus new programs.

- **What the materiality threshold(s) should be.**

Further consultation is required.

- **Other opportunities for improvement identified by stakeholders attending the consultation.**

Generally speaking, EDTI supports the Commission's ongoing assertive case management efforts in tariff proceedings. EDTI continues to support written processes where reasonable; when oral hearings are required, EDTI requests in-person rather than virtual sessions be accommodated.

3. Please call me directly at (780) 412-4593 if you should have any questions or concerns with respect to this submission.

Sincerely,

[Electronically Submitted]

John Cassano
Director, Transmission
EPCOR Distribution & Transmission Inc.