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November 12, 2024

Emailed to engage@auc.ab.ca

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

Attention: Laura Johnson

Dear Ms. Johnson:

**Re: Alberta Utilities Commission (“AUC” or “Commission”) Bulletin 2024-21
Written consultation established on draft rule to facilitate funding to the Utilities
Consumer Advocate**

On October 8, 2024, the AUC issued Bulletin 2024-21 (the “Bulletin”) seeking public comment on a draft rule to facilitate funding to the Utilities Consumer Advocate. In the Bulletin, the draft rule places a UCA administration fee on distribution utilities regulated by the AUC and sets out its determination and calculation. The UCA Administration Fee Backgrounder (the “Backgrounder”), posted on the AUC’s Engage page, clarified that there would be a new line item on customer utility bills identifying their contribution to the UCA’s annual funding. Further, the Backgrounder also states that these changes should be cost neutral; customers should not pay more or less due to this change.

ENMAX Corporation, on behalf of ENMAX Energy Corporation and ENMAX Power Corporation, supports the new funding model and the draft rule. It also appreciates the opportunity to provide the following feedback.

ENMAX Power prefers to flow-through the UCA’s annual funding to each Distribution Facility Owner’s customers on a per site basis and a mechanism to true-up the collection of UCA’s annual funding costs. Distribution utilities are allowed to collect AUC assessment fees as a Y factor in their PBR annual rate applications, as such, a similar approach could be taken with the UCA’s annual funding costs.

ENMAX Power will incur up to around \$100,000 to implement¹ the new line item and create the new component category on customer utility bills identifying their contribution to the UCA’s annual funding. ENMAX Power intends to flow this incremental system implementation cost as

¹ Efforts will include rate development, conducting functional and integration testing, and retailer management.

part of the Y factor adjustment in its PBR annual rate applications. Further, it usually takes around three months for ENMAX Power to fully implement and test a bill change like this.

This change will also impact retailers. ENMAX is not in a position to comment on the impact to other retailers in the province. For ENMAX Energy, there will be changes to the line-item description and associated explanations on the bill. For ENMAX Energy, there is a limit of 80 characters to the line-item description. ENMAX Energy will also incur an incremental system cost to implement these bill changes and appreciates an opportunity to recover the actual cost when the implementation is complete. Lastly, it would take up to three months for ENMAX Energy to implement such bill change.

If you have any questions, please contact Joyce Cui at 403-473-2176.

Sincerely,

Joyce Cui

Joyce Cui (Nov 12, 2024 13:47 MST)

Joyce Cui
Director, Regulatory Applications
ENMAX Corporation