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November 14, 2024

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

**Re: Bulletin 2024-20  
Written Consultation Established on Draft Amendments to Rule 009**

1. EPCOR Distribution & Transmission Inc. (EDTI) submits these comments in response to the written consultation established by the Alberta Utilities Commission on October 3, 2024. EDTI appreciates the opportunity to provide feedback and has comments in relation to the proposal to discontinue the practice of allowing agents to recover costs for acting as a representative in a proceeding.
2. EDTI agrees with the Commission's commentary related to the increasingly complex and legally technical nature of proceedings. Fair and appropriate representation within these proceedings is best delivered by a lawyer in relation to whom a litigant has recourse through the Law Society of Alberta.
3. EDTI submits that participation of non-legal agents in AUC hearings may result in delays or inefficiencies (and therefore higher costs) due to the non-legal agent's lack of familiarity with administrative procedure or AUC rules. EDTI agrees with the Commission's comment in Bulletin 2024-20 that agents may be of assistance with certain administrative tasks however, agent support requiring legal advice, drafting legal documents, negotiation legal rights and analyzing and interpreting the law are activities that are considered the practice of law and as such are restricted to lawyers licensed to practice law. Moreover, this is a stipulation of the *Legal Profession Act*.<sup>1</sup>

Sincerely,

*[Electronically Submitted]*

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

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<sup>1</sup> Legal Profession Act, RSA 2000, c L-8, s.106