

Rules 021 and 028 Questions

Comments from
(company/stakeholder name): ATCO Electric and ATCO Gas

Date [yyyy/mm/dd]: 2026/08/05

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Instructions:

1. Please review Bulletin 2026-11.
2. Please download this document, save as “**Rules 021 and 028 questions**”.
3. Fill out the contact information above and provide your responses to the questions within the indicated fields below.
4. Submit your response to engage@auc.ab.ca. In the email, please include the following subject line: **Rules 021 and 028 engagement**.

Rule 021: Settlement System Code Rules Questions

Section	Existing wording	Question	Response
2.15 Timing of meter reads	Times refer to times on the prevailing local clock, standard or daylight time depending on the season, using a 24-hour clock. The hours, minutes and seconds 23:59:59 refer to the second before midnight, and the next second is 00:00:00 of the next day.	Would revising this language to say: "Times refer to Alberta Time, using a 24-hour clock. The hours, minutes and seconds 23:59:59 refer to the second before midnight, and the next second is 00:00:00 of the next day." and a definition added for "Alberta Time" such as <i>"Alberta Time" has the meaning given to that term in the Official Time Act and the regulations made under it.</i> provide the necessary revisions to this section of Rule 021?	Yes, the revised language would provide the necessary amendments to this section of Rule 021. ATCO would, however, recommend including transitional wording to clarify the requirements that applied prior to November 1, 2026. This additional context would improve transparency while ensuring a clear distinction between the previous and updated requirements. As discussed further below, this clarification could be incorporated through an Appendix that outlines the applicable requirements and timelines in effect prior to November 1, 2026.
9.4.6.1 Date and date time format	The standard date time format has been defined as: YYYYMMDDHHMISS where, YYYY four-digit year (e.g. 2020) MM two-digit numeric month between 01 and 12 inclusive (e.g. 09) DD two-digit numeric day 01 and 31 inclusive (e.g. 03) HH hour on a 24-hour clock 00 to 23 (e.g. 22) MI minutes 00 to 59 (e.g. 02) SS seconds 00 to 59 (e.g. 09)	Are any changes required to this language? Is it compatible as-is with Alberta Time given the current reference to a 24-hour clock?	ATCO does not believe any changes are necessary for this Section, as this Section is independent from the different time zones we operate in.
Section 9.4.6.3 Time Conventions	(1) Clock time Times refer to times on the prevailing local clock, standard or daylight time depending on the season. (2) Adjusting for daylight saving	If this section were removed, is any new language required in its place? For example:	ATCO would recommend keeping this Section by relocating it in an Appendix and referring to it within the Rule. This additional context would improve transparency while ensuring a clear

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Section	Existing wording	Question	Response
	Adjusting for daylight saving in DSMs is explained in Table 13 in Section 9.6.2.4.1. In DIMs, clock adjustments for daylight saving are carried out using the convention that the clock is set to the new time system at the instant prior to 02:00:00 and 02:00:00 on the old time system never occurs. In the spring, the clock changes from 01:59:59 Mountain Standard Time (MST) to 03:00:00 Mountain Daylight Time (MDT). In the fall, the clock changes from 01:59:59 MDT to 01:00:00 MST. For purposes of identification and reporting of hour ending: (a) On the day of the springtime change, hour ending 02 does not exist. Hour ending 03 follows hour ending 01. All energy consumed in the period between 00:00:01 and 01:00:00 is labelled "01"; energy consumed in the following hour is labelled "03"; and each hour thereafter is labelled incrementally such that there are 23 identifiers for the day where hour ending 24 is the last hour and hour ending 02 is not used. (b) On the day of the fall time change, hour ending 02 occurs twice, with the second occurrence denoted with an asterisk (02*). All energy consumed in the period between 00:00:01 and 01:00:00 is labelled "01"; energy consumed in the period between 01:00:01 and 02:00:00 is labelled "02"; energy consumed in the following hour is labelled "02*"; energy consumed in the fourth hour of that day is labelled	- Require that historical data be maintained in the format (i.e., with the time standards) applicable at the time - State that as of Nov 1, 2026, all data will be created within Alberta Time intervals (i.e. a consistent year round clock)? - Clarify time convention for any interval transactions other than DIM and DSM? If so, please identify those transactions. - What revisions are needed for the example table in this section.	distinction between the previous and updated requirements.

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Section	Existing wording	Question	Response
	"03"; and so on, resulting in 25 identifiers for the day where hour ending 24 is the last hour and hour ending 02* is added.		
Table 6 (DIM) Description for Field 19	Mandatory field – Two digits representing the ending hour of the interval period. The third character is only for an asterisk as described Section 9.4.6.3(2)(b).	Will changes be required here, or will they be addressed within proposed changes to Section 9.4.6.3 ?	ATCO believes that this will be addressed in Section 9.4.6.3. No further changes required.
Table 7 (GIM) Description for Field 13	Mandatory field – Two digits representing the ending hour of the interval period. The third character is only for an asterisk as described Section 9.4.6.3(2)(b).	Will changes be required here, or will they be addressed within proposed changes to Section 9.4.6.3 ?	ATCO believes that this will be addressed in Section 9.4.6.3. No further changes required.
Table 10 (WSI) Description for Field 15	Mandatory field – Two digits representing the ending hour of the interval period. The third character is only for an asterisk as described Section 9.4.6.3(2)(b).	Will changes be required here, or will they be addressed within proposed changes to Section 9.4.6.3 ?	ATCO believes that this will be addressed in Section 9.4.6.3. No further changes required.
Table 11 (SSI) Description for Field 11	Mandatory field – Two digits representing the ending hour of the interval period. The third character is only for an asterisk as described Section 9.4.6.3(2)(b).	Will changes be required here, or will they be addressed within proposed changes to Section 9.4.6.3 ?	ATCO believes that this will be addressed in Section 9.4.6.3. No further changes required.
Table 12 (SPI) Description for Field 12	Mandatory field – Two digits representing the ending hour of the interval period. The third character is only for an asterisk as described Section 9.4.6.3(2)(b).	Will changes be required here, or will they be addressed within proposed changes to Section 9.4.6.3 ?	ATCO believes that this will be addressed in Section 9.4.6.3. No further changes required.
Table 13 (DSM) Description for Field 4	Mandatory field – Hour ending for the hour of energy flow of metering data, numbered from 1 to 24 (except on the first day of daylight time when they are numbered from 1 to 23 and on the first day of standard time when they are numbered from 1 to 25). Example: "1" = 00:00 to 01:00.	Should the instructions related to daylight savings time be removed? Is any new instruction required in its place? For example, is a new indicator required to indicate the data was produced on or after Nov 1 2026 under Alberta Time?	ATCO would recommend removing the references to MST and MDT, while adding a reference to the appendix for data captured prior to November 1, 2026.
Table 16 (WCI) Description for Field 17	Mandatory field – Two digits representing the ending hour of the interval period. The third	Will changes be required here, or will they be addressed within proposed changes to Section 9.4.6.3 ?	ATCO believes that this will be addressed in Section 9.4.6.3. No further changes required.

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Section	Existing wording	Question	Response
	character is only for an asterisk as described in Section 9.4.6.3(2)(b).		
Table 25 (RSA) Description for Field 9	Mandatory field – Two digits representing the ending hour of the interval period. The third character is only for an asterisk as described in Section 9.4.6.3(2)(b).	Will changes be required here, or will they be addressed within proposed changes to Section 9.4.6.3 ?	ATCO believes that this will be addressed in Section 9.4.6.3. No further changes required.
Table 27 (TAA) Description for Field 9	Mandatory field – Two digits representing the ending hour of the interval period. The third character is only for an asterisk as described in Section 9.4.6.3(2)(b).	Will changes be required here, or will they be addressed within proposed changes to Section 9.4.6.3 ?	ATCO believes that this will be addressed in Section 9.4.6.3. No further changes required.
Additional Tables		Are there any additional tables that will require adjustment or clarifications to implement Alberta Time?	ATCO cannot identify any additional tables that will require adjustments or clarifications.
Section 9.6.6 Post-final adjustment mechanism (PFAM) transaction		This section describes the roles and requirements related to post-final adjustments. Will any requirements be impacted by the move to Alberta Time?	Given the complexity and expediated timing of this change, ATCO would recommend adding some additional wording which would enable a transition period – re. a one year - to address potential PFAM issues that may arise from this change.
Additional changes		Are there additional changes to Rule 021 required to implement Alberta Time? For example, an Appendix to further explain the treatment of historical data? If so, what direction from the AUC is needed in such an Appendix?	As noted above, ATCO would support an appendix which would outline past practices prior to November 1, 2026, Alberta Time conversion.

Rule 028: Natural Gas Settlement System Code Rules Questions

Section	Existing wording	Question	Responses
2.12 Timing of meter reads	Times refer to times on the prevailing local clock, standard or daylight time depending on the season, using a 24-hour clock. The hours, minutes and seconds 23:59:59 refer to the second before midnight, and the next second is 00:00:00 of the next day.	Would revising this language to say: "Times refer to Alberta Time, using a 24-hour clock. The hours, minutes and seconds 23:59:59 refer to the second before midnight, and the next second is 00:00:00 of the next day." and a definition added for "Alberta Time" such as <i>"Alberta Time" has the meaning given to that term in the Official Time Act and the regulations made under it.</i> provide the necessary revisions to this section of Rule 028?	Yes, the revised language would provide the necessary revisions to this Section of Rule 028. ATCO would, however, recommend including transitional wording to clarify the requirements that applied prior to November 1, 2026. This additional context would improve transparency while ensuring a clear distinction between the previous and updated requirements. As discussed further below, this clarification could be incorporated through an Appendix that outlines the applicable requirements and timelines in effect prior to November 1, 2026.
8.4.2 File naming convention	(1) All transactions of the same type for a period (usually one day) are to be placed in a single CSV format file. The standard file naming convention is: TRX_From_To_YYYYMMDDHHMISS.CSV or TRX_From_To_YYYYMMDDHHMISS.csv where, TRX Three-letter abbreviation for the transaction name (e.g. "SRR"). The three letters must be in upper case format. From ID of the sender, either distributor ID, retailer ID or settlement ID. To ID of the receiver, either distributor ID, retailer ID or settlement ID. YYYYMMDD Date the file was created. HHMISS Time the file was created on a 24-hour clock.	Are any changes required to this language? Is it compatible as-is with Alberta Time given the current reference to a 24-hour clock?	ATCO does not believe any changes are necessary for this Section, as this Section is independent from the different time zones we operate in.

Rule 028: Natural Gas Settlement System Code Rules Questions

Section	Existing wording	Question	Responses
Section 8.4.6.3 Time Conventions	(1) Clock time Times refer to times on the prevailing local clock, standard or daylight time depending on the season. (2) Adjusting for daylight saving For determining the start and end of the gas day, there is no adjustment for daylight saving. The gas day always starts at 8:00 Mountain Standard Time. During the period of daylight savings, therefore, the start of the gas day is at 09:00 Mountain Daylight Time (i.e. 08:00 Mountain Standard Time).	If this section were removed, is any new language required in its place? For example: - Require that historical data be maintained in the format (i.e. with the time standards) applicable at the time - State that as of Nov 1, 2026, all data will be created within Alberta Time intervals (i.e., a consistent year round clock)? - Revising the start and end of the gas day? - Clarify time convention or for any specific transactions? If so, please identify those transactions.	ATCO would recommend keeping this Section by relocating it to an Appendix and referring to it within the Rule. This additional context would improve transparency while ensuring a clear distinction between the previous and updated requirements. ATCO understands that the current Rule 028 convention establishes the start of the gas day at 8:00 Mountain Standard Time. As a result, under Alberta Time (UTC-6), the gas day would begin at 9:00 Alberta Time. ATCO is currently awaiting confirmation from Intercontinental Exchange Natural Gas Exchange (ICE NGX) and TC Energy Corporation on the impact of Alberta Time on the gas day convention. ATCO confirms that maintaining the gas day at 8:00 Mountain Standard Time, which would correspond to 9:00 Alberta Time, would not result in significant operational changes.
Tables	Table 4 (WSI) – Description for field 13 Existing wording: Mandatory field – Date and start time of the interval the settlement data is for. This will be the start of gas day at 8:00 standard time. Table 6 (WSD) – Description for field 12	Are there any tables that will require adjustment or clarifications to implement Alberta Time?	ATCO understands that the current Rule 028 convention establishes the start of the gas day at 8:00 Mountain Standard Time. As a result, under Alberta Time, the gas day would begin at 9:00 Alberta Time.

Rule 028: Natural Gas Settlement System Code Rules Questions

Section	Existing wording	Question	Responses
	Existing wording: Mandatory field – Date and start time of the interval the settlement data is for. This will be the start of gas day at 8:00 standard time. Table 7 (SPV) – Description for field 11 Existing wording: Mandatory field – Date and start time of the interval the settlement data is for. This will be the start of the gas day at 08:00 standard time.		
Additional changes	Section 1.1: Key Terms Existing wording: gas day - A gas day is the 24-hour period starting at 8 a.m. Section 4.2.2: Estimation Runs Existing wording: Backcast (B1) is the estimate of a retailer's aggregate consumption for a gas day based on actual and forecast temperatures and will be provided each day no later than 08:00.	Are there additional changes to Rule 028 required to implement Alberta Time? For example, an Appendix to further explain the treatment of historical data? If so, what direction from the AUC is needed in such an Appendix?	ATCO understands that the current Rule 028 convention establishes the start of the gas day at 8:00 Mountain Standard Time. As a result, under Alberta Time, the gas day would begin at 9:00 Alberta Time. As noted above, ATCO would support an Appendix which would outline past practices prior to November 1, 2026, Alberta Time conversion.