

Rules 021 and 028 questions

Comments from
(company/stakeholder name): EPCOR Distribution & Transmission Inc.

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

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(for companies):

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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?	No concerns.
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?	No language changes required.
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:	EDTI proposes keeping this wording in the Rule and adding an additional note along the section header stating that "After March 8 th , 2026 this section is not required." This allows the previous date formats and files to exist for legacy reference and acknowledgement that the

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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.	previous, original files do not need to change and remain "as-is". It will also allow for cleaner formatting for the relevant Tables (see below).

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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 ?	If language remains consistent with EDTI's proposal above for Section 9.4.6.3 allows this section to remain the same as proposed (i.e. - acknowledging an "as of" date after March 8 th , 2026)
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 ?	Same as above.
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 ?	Same as above.
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 ?	Same as above.
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 ?	Same as above.
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?	Same as above.

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Section	Existing wording	Question	Response
Table 16 (WCI) Description for Field 17	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 ?	Same as above.
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 ?	Same as above.
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 ?	Same as above.
Additional Tables		Are there any additional tables that will require adjustment or clarifications to implement Alberta Time?	A peripheral impact for industry to prepare for will be how this may influence hourly pool prices, but this is not in scope for Rule 021.
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?	EDTI expects that RSAs for interval sites will be the only impact to this Section. If this is the case, then it is already covered in the proposal and EDTI's response above for Table 25.
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?	An Appendix would be one option to approach it. However, with EDTI's proposal above for an "as of", "prior to" or "after" date of relevance, there would be no need for an Appendix to explain historical data while avoiding added length and formatting to the Rule. In any case, EDTI acknowledges the need to keep it in the document for legacy reference one way or another (for now). Due to the difficulty to test this change outside of a production environment, EDTI aligns with industry peers that formal acknowledgement of a sustainment period where AESO, AUC and

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Section	Existing wording	Question	Response
			market have an open space to collaborate while systems and IT teams work through any bugs. EDTI suggests acknowledging a 6 month “sustainment period” to account for a full previous DST change over cycle).

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?	
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?	

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.	
Tables		Are there any tables that will require adjustment or clarifications to implement Alberta Time?	
Additional changes		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?	