

Rules 021 and 028 Feedback on Draft Amendments Questions

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

Date [yyyy/mm/dd]: 2026-09-18

Contact name
(for companies): Greg Marghella (ATCO Electric) and Leanne Wong (ATCO Gas)

Phone:

Email:

Instructions:

1. Please review [Bulletin 2026-12](#).
2. Please download this document, save as “**Rules 021 and 028 feedback on draft amendments [name of company or individual]**.”
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

Content	Response
Please review the draft Rule amendments in full. Do you have any concerns about how the draft amendments are currently written? If so, suggest revised or additional wording accordingly.	ATCO Electric does not have any concerns around how the draft amendments are currently written.
Please review the draft Rule amendments in full. Are there additional sections that you think require changes to affect Alberta time? If so, please identify those sections, and propose amendments to those sections.	ATCO Electric does not believe there are any further requirements to the other sections.
If you have additional comments or would like to provide additional context to the AUC in relation to the draft Rule amendments, please provide it here.	ATCO Electric is making every effort to ensure its systems, processes, and technologies are updated to accommodate Alberta's transition to permanent Standard Time. However, given the complexity of the required changes and the accelerated implementation timeline, ATCO continues to recommend the inclusion of transitional provisions or additional flexibility within the rule. The purpose would be to ensure transparency with all industry participants and continued alignment to achieve a successful transition. Specifically, ATCO recommends consideration of a transition period, such as one year following implementation, to allow utilities to identify and address any unforeseen issues that may arise as a result of this significant change. ATCO Electric has developed a comprehensive implementation plan that includes system modifications, pre-implementation testing, and dedicated resources to support the transition and respond to issues following the November conversion. Despite these preparations, the scale and complexity of the change create a risk that isolated issues may not be identified until the conversion has occurred.

Rule 021: Settlement System Code Rules Questions

Content	Response
	Accordingly, a transition period would provide utilities with the flexibility necessary to address unforeseen circumstances in a timely manner while being transparent with industry participants. As an update to the implementation of testing, testing of various systems is anticipated to commence in the coming weeks. ATCO Electric continues to evaluate the requirements and potential changes/solution for any changes to the physical meters themselves (as discussed, every DFO will have different requirements based on their meters and configurations). ATCO Electric will continue to update the Commission as the requirements and solutions are determined.

Rule 028: Natural Gas Settlement System Code Rules Questions

Content	Response
Please review the draft Rule amendments in full. Do you have any concerns about how the draft amendments are currently written? If so, suggest revised or additional wording accordingly.	ATCO Gas generally supports the proposed amendments to Rule 028, including the objective of defining Alberta time and clarifying the corresponding gas-day start and end times. However, ATCO Gas has concerns with the proposed wording of section 8.4.6.3. In particular, the requirement that all measurements, meter reads, metering data, profiling, transaction records, reports, settlement calculations, and other market activities use Alberta time could be interpreted as extending the amendment beyond the intended time and gas-day convention. The references to specific activities may create uncertainty regarding the scope and intended effect of the amendment, including whether it is intended to establish a time convention for Rule 028 purposes or to require broader operational or system changes. ATCO Gas does not believe section 8.4.6.3 should introduce ambiguity regarding implementation requirements. ATCO Gas recommends that section 8.4.6.3 retain the narrower approach used in the previous wording by defining Alberta time and the applicable gas-day convention, without detailing measurements, data, calculations, records, or market activities. This would clarify the applicable time convention while avoiding unintended implications regarding broader implementation requirements. Proposed Wording: <u>Alberta Time</u> Effective November 1, 2026, times shall be expressed in Alberta time. For determining the start and end of the gas day, the gas day begins at 09:00 Alberta time and ends at 09:00 Alberta time on the following day. <u>Historic Time Standard</u> For periods before November 1, 2026, times shall be expressed in either Mountain Standard Time or Mountain Daylight Time, depending on the season. For determining the start and end of gas day, there is no adjustment for daylight saving time. The gas day begins at 08:00 Mountain Standard Time, which corresponds to 09:00 Mountain Daylight Time. However, settlement transactions created on or after November 1, 2026, shall use Alberta Time, regardless of whether they relate to periods before or after November 1, 2026.

Rule 028: Natural Gas Settlement System Code Rules Questions

Content	Response
Please review the draft Rule amendments in full. Are there additional sections that you think require changes to affect Alberta Time? If so, please identify those sections, and propose amendments to those sections.	ATCO Gas does not believe there are any additional sections that require changes.
If you have additional comments or would like to provide additional context to the AUC in relation to the draft Rule amendments, please provide it here.	ATCO Gas does not have any additional comments.