

Rules 021 and 028 questions

Comments from FortisAlberta Inc.
(company/stakeholder name):

Date [yyyy/mm/dd]: 2026/08/06

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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**.

Section	Existing working	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?	Revised wording is appropriate. FortisAlberta agrees that the definition for Alberta Time should be added to section 1.1 and suggests that the following definition for Historic Time Standard be added: “Historic Time Standard” means the time convention applicable under this Rule to a period of energy flow occurring before November 1, 2026, including the applicable standard-time or daylight-saving-time designation, daylight-saving time transition rules, hour-ending identifiers, interval structure, and settlement-day structure. For greater certainty: (a) during the spring daylight-saving time transition, the settlement day consisted of twenty-three (23) hours and Hour Ending 02 did not occur; and (b) during the fall daylight-saving time transition, the settlement day consisted of twenty-five (25) hours and included both Hour Ending 02 and Hour Ending 02*.
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)	Are any changes required to this language? Is it compatible as-is with Alberta Time given the current reference to a 24-hour clock?	Yes, “as-is” is compatible with Alberta Time. No changes are required.

	SS seconds 00 to 59 (e.g. 09)		
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 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	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)? - 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.	FortisAlberta agrees that if this section were removed new language requiring that historical data be maintained in the format applicable at the time will need to be added. Further, language that, as of November 1, 2026, all data will be created within Alberta Time intervals will also be required. FortisAlberta suggests that section 9.4.6.3 be amended to specify time rules applicable to the time of the energy flow. FortisAlberta's proposed revisions are below. 9.4.6.3 Time conventions (1) Alberta Time - for periods of energy flow occurring on or after November 1, 2026, all times used for metering, profiling, transaction exchange, reporting, settlement calculations, and related market activities shall be expressed in Alberta Time. (2) Historic Time Standard - for periods of energy flow occurring prior to November 1, 2026, all times used for metering, profiling, transaction exchange, reporting, settlement calculations, and related market activities shall be expressed in Historic Time Standard. FortisAlberta submits that there is no need to clarify the time convention for any interval transactions other than DIM and DSM and no revisions to the example table in this section are required.

	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 "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 ?	FortisAlberta suggests that, in accordance with its proposed amendments to section 9.4.6.3 discussed above, the reference to subsection (b) be removed as this subsection will no longer be in effect. FortisAlberta's proposed revision is as follows: Mandatory field – Two digits representing the ending hour of the interval period. The third character is only for an asterisk as per Section 9.4.6.3(2).
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 ?	FortisAlberta suggests that, in accordance with its proposed amendments to section 9.4.6.3 discussed above, the reference to subsection (b) be removed as this subsection will no longer be in effect. FortisAlberta's proposed revision is as follows: Mandatory field – Two digits representing the ending hour of the interval period. The third character is only for an asterisk as per Section 9.4.6.3(2).
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 ?	FortisAlberta suggests that, in accordance with its proposed amendments to section 9.4.6.3 discussed above, the reference to subsection (b) be removed as this subsection will no longer be in effect. FortisAlberta's proposed revision is as follows: Mandatory field – Two digits representing the ending hour of the interval period. The third

			character is only for an asterisk as per Section 9.4.6.3(2).
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 ?	FortisAlberta suggests that, in accordance with its proposed amendments to section 9.4.6.3 discussed above, the reference to subsection (b) be removed as this subsection will no longer be in effect. FortisAlberta's proposed revision is as follows: Mandatory field – Two digits representing the ending hour of the interval period. The third character is only for an asterisk as per Section 9.4.6.3(2).
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 ?	FortisAlberta suggests that, in accordance with its proposed amendments to section 9.4.6.3 discussed above, the reference to subsection (b) be removed as this subsection will no longer be in effect. FortisAlberta's proposed revision is as follows: Mandatory field – Two digits representing the ending hour of the interval period. The third character is only for an asterisk as per Section 9.4.6.3(2).
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?	FortisAlberta suggests that, in accordance with its proposed amendments to section 9.4.6.3 discussed above, the reference to subsection (b) be removed as this subsection will no longer be in effect. FortisAlberta's proposed revision is as follows: Mandatory field – Two digits representing the ending hour of the interval period. The third character is only for an asterisk as per Section 9.4.6.3(2).
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 ?	FortisAlberta suggests that, in accordance with its proposed amendments to section 9.4.6.3 discussed above, the reference to subsection (b) be removed as this subsection will no longer be

			in effect. FortisAlberta's proposed revision is as follows: Mandatory field – Two digits representing the ending hour of the interval period. The third character is only for an asterisk as per Section 9.4.6.3(2).
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 ?	FortisAlberta suggests that, in accordance with its proposed amendments to section 9.4.6.3 discussed above, the reference to subsection (b) be removed as this subsection will no longer be in effect. FortisAlberta's proposed revision is as follows: Mandatory field – Two digits representing the ending hour of the interval period. The third character is only for an asterisk as per Section 9.4.6.3(2).
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 ?	FortisAlberta suggests that, in accordance with its proposed amendments to section 9.4.6.3 discussed above, the reference to subsection (b) be removed as this subsection will no longer be in effect. FortisAlberta's proposed revision is as follows: Mandatory field – Two digits representing the ending hour of the interval period. The third character is only for an asterisk as per Section 9.4.6.3(2).
Additional Tables		Are there any additional tables that will require adjustment or clarifications to implement Alberta Time?	FortisAlberta has not identified any additional tables requiring changes.
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?	FortisAlberta has not identified any requirements that will be impacted by the move to Alberta Time.

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?	FortisAlberta is requesting a separate implementation guidance manual or an appendix addressing industry testing, transition/cutover expectations, exception management and any temporary compliance forbearance. These measures would give the market clear compliance directions while preserving flexibility for practical implementation across different systems and market participants.
Other Comments	FortisAlberta appreciated the opportunity to meet with other interested stakeholders on June 30, 2026, to discuss the implications of implementing Alberta Time. These discussions provided valuable insight into the perspectives of affected parties and highlighted the complexity and breadth of the issues that remain to be addressed. While FortisAlberta recognizes the Commission's objective of issuing final rules by mid-October, the Company is concerned that the current engagement process is insufficient to support the level of collaboration necessary to develop amendments to Rule 021 and Rule 028 that are workable, practical, and effective for all impacted parties. Given the significant operational, technical, and settlement-related implications of the proposed changes, FortisAlberta respectfully submits that additional stakeholder engagement is essential. The Company therefore requests that the Commission convene in-person or virtual working sessions with all affected parties, including Meter Data Managers, rural electrification associations and retailers, following the August 5, 2026 comment submissions and again following the release of the next draft amendments to Rule 021 and Rule 028 anticipated in late August 2026. One issue that particularly warrants further collaboration is the treatment of historical data. Under FortisAlberta's current systems, implementing Alberta Time will affect both future and historical data, as the Company does not have the capability to maintain separate time zone treatments for historic and prospective records. This limitation has potential implications for load settlement, as market participants may otherwise rely on differing hourly data sets and time conventions. Given the broader implications of this issue across the electricity sector, FortisAlberta believes that a coordinated industry approach is required and would greatly benefit from further discussion with affected stakeholders and the Commission regarding an appropriate path forward. FortisAlberta is also concerned that the Commission engagement regarding the proposed rule changes does not appear to contemplate any industry-wide testing prior to implementation. Without coordinated testing across affected market participants, system, operational, and data integration issues may not be identified until after implementation. Such an approach creates a material risk of unintended consequences, operational disruptions, settlement inaccuracies, and delays in achieving a successful transition to Alberta Time. To mitigate these risks, FortisAlberta recommends that the Commission establish and facilitate structured testing sessions involving all impacted parties before the rules come into force. Meaningful testing is a critical component of implementation and will help ensure that the rule changes function as intended across interconnected systems and processes. Finally, FortisAlberta notes that, despite the best efforts of all parties, it will not be possible to identify and resolve every implementation issue in advance of the transition to Alberta Time. As a result, the Company recommends that the Commission establish a transitional compliance period of six months following implementation during which penalties under AUC Rule 032: Specified Penalties for Contravention of AUC Rules, Orders and Decisions for non-compliance with Rule 021 or Rule 028 are not imposed. A limited period of regulatory forbearance would allow parties to identify, report, and rectify unforeseen issues in a transparent and collaborative manner, thereby supporting a more orderly and successful implementation while avoiding punitive consequences for good-faith efforts to comply with newly implemented requirements.		