

Rules 021 and 028 feedback on draft amendments questions

Comments from
(company/stakeholder name): Apex Utilities Inc.

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

Contact name
(for companies): Linda Kinnee, Greg Schiller

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.	N/A
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.	N/A
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.	N/A

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.	Apex Utilities Inc. (Apex) supports the overall objective of updating Rule 028 to accommodate Alberta time. The feedback below includes both recommendations intended to improve clarity and consistency, as well as some areas where Apex is concerned that the proposed wording may extend beyond the changes necessary to implement Alberta time and could result in unintended impacts to existing systems and processes, thereby resulting in significant unnecessary costs to be borne by gas utilities. Definitions: Apex recommends simplifying the proposed definition of "historic time standard." The proposed definition includes several concepts that are applicable to Rule 021 but not required for Rule 028 and will unnecessarily complicate the interpretation of historical gas settlement data. A simpler definition achieves the same objective while providing greater clarity. Recommendation Replace Draft Amendment wording with the following: "historic time standard: Historic time standard means the time convention applicable to a period of energy flow occurring before November 1, 2026." 8.4.6.3 Time conventions: Apex has concerns with the proposed amendments to Section 8.4.6.3, particularly the treatment of transactions and metering data associated with Gas Days before and after November 1, 2026. (1) Alberta time Nova Gas Transmission Limited (NGTL) has confirmed that it is not changing its tariff definition of the Gas Day. The Gas Day will therefore continue to begin at 8:00 a.m. Mountain Standard Time (MST) (UTC-7), which corresponds to 9:00 a.m. Alberta time (UTC-6) following Alberta's transition to permanent Alberta time. Apex's meters, encoder receiver transmitters (ERTs) and associated measurement systems are currently programmed using the existing MST-based Gas Day. This level of change is not necessary to implement Alberta time under Rule 028. Unlike Rule 021, the smallest measurement and settlement interval

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	under Rule 028 is a Gas Day. The specific hour associated with a meter reading or settlement transaction does not change the applicable Gas Day or the underlying measurement quantity. As a result, metering devices do not require any programming changes. If the proposed amendments require the underlying meter reading timestamps to be converted from MST to Alberta time, Apex will be required to reprogram approximately 100,000 field devices and implement extensive changes across multiple measurement, billing and settlement systems. This will require significant cost to implement system changes and increase complexity to Apex's current systems and processes that are not warranted nor prudent. <u>Recommendation</u> Replace Draft Amendment wording with the following: “(1) Alberta time Effective November 1, 2026, all transactions and reporting shall use Alberta time as the applicable time convention.” (2) Historic time standard Apex has concerns with the proposed treatment of the historic time standard. As currently drafted, the language appears to require settlement transactions, reports, and related calculations associated with periods prior to November 1, 2026, to continue using the historic time standard, even when those transactions are created after the transition to Alberta time. This approach creates implementation challenges for Rule 028 settlement processes. Following the transition to Alberta time, settlement transactions supporting S1, S2 and S3 will continue to be produced for historical Gas Days occurring before November 1, 2026. Under the proposed wording, it is unclear whether the applicable time convention is determined by the date of the Gas Day or the date the transaction is created. Apex submits that it is not practical or necessary to require settlement systems to apply different time conventions based on the underlying Gas Day. Once systems are converted to Alberta time, all settlement transactions created on or

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	after November 1, 2026, should be generated using Alberta time (UTC-6), regardless of the period being settled. Accordingly, Apex recommends that the applicability of Alberta time be based on the date a transaction, report, calculation, or other Rule 028 output is created, rather than the date of the underlying Gas Day. <u>Recommendation</u> Replace Draft Amendment wording with the following: “(2) Historic time standard Transactions, reports, settlement calculations, and other Rule 028 outputs created before November 1, 2026, shall use the historic time standard as the applicable time convention. However, transactions, reports, settlement calculations, and other Rule 028 outputs created on or after November 1, 2026, shall use Alberta time (UTC-6). The gas day always starts at 09:00 Alberta time.” Apex submits that this recommended approach provides the intended consistency of Alberta time for Rule 028 transactions while minimizing unnecessary system, process, and implementation impacts. It also maintains alignment with the market-standard Gas Day established by NGTL and avoids introducing complexity where no corresponding settlement or operational benefit exists.
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.	No.

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Content	Response
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.	Update “AltaGas Utilities Inc.” to “Apex Utilities Inc.” to reflect Apex’s name change in Appendix A, Tables A-2, A-3, A-4, and A-5 of Rule 028. Although Rule 028 was last amended and approved by the AUC on December 16, 2020, the name change that was effective November 9, 2020, was not captured in that amendment.