

## Rules 021 and 028 questions

Comments from  
(company/stakeholder name):

Apex Utilities Inc.

Date [yyyy/mm/dd]: August 5, 2026

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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](mailto: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 |
|------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------|
| <b>2.15 Timing of meter reads</b>        | 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:<br><br>"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."<br><br>and<br><br>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><br><br>provide the necessary revisions to this section of Rule 021? | N/A      |
| <b>9.4.6.1 Date and date time format</b> | The standard date time format has been defined as: YYYYMMDDHHMISS<br>where,<br>YYYY four-digit year (e.g. 2020)<br>MM two-digit numeric month between 01 and 12 inclusive (e.g. 09)<br>DD two-digit numeric day 01 and 31 inclusive (e.g. 03)<br>HH hour on a 24-hour clock 00 to 23 (e.g. 22)<br>MI minutes 00 to 59 (e.g. 02)<br>SS seconds 00 to 59 (e.g. 09) | Are any changes required to this language?<br><br>Is it compatible as-is with Alberta Time given the current reference to a 24-hour clock?                                                                                                                                                                                                                                                                                                                                               | N/A      |
| <b>Section 9.4.6.3 Time Conventions</b>  | (1) Clock time<br>Times refer to times on the prevailing local clock, standard or daylight time depending on the season.<br>(2) Adjusting for daylight saving                                                                                                                                                                                                    | If this section were removed, is any new language required in its place?<br><br>For example:                                                                                                                                                                                                                                                                                                                                                                                             | N/A      |

## Rule 021: Settlement System Code Rules questions

| Section | Existing wording                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Question                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Response |
|---------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------|
|         | <p>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:</p> <p>(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.</p> <p>(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</p> | <ul style="list-style-type: none"> <li>• Require that historical data be maintained in the format (i.e., with the time standards) applicable at the time</li> <li>• State that as of Nov 1, 2026, all data will be created within Alberta Time intervals (i.e. a consistent year round clock)?</li> <li>• Clarify time convention for any interval transactions other than DIM and DSM? If so, please identify those transactions.</li> <li>• What revisions are needed for the example table in this section.</li> </ul> |          |

## Rule 021: Settlement System Code Rules questions

| 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.                                                                                                                                                               |                                                                                                                                                                                                                                                 |          |
| <b>Table 6 (DIM)<br/>Description for Field 19</b>  | 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 ?                                                                                                                                           | N/A      |
| <b>Table 7 (GIM)<br/>Description for Field 13</b>  | 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 ?                                                                                                                                           | N/A      |
| <b>Table 10 (WSI)<br/>Description for Field 15</b> | 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 ?                                                                                                                                           | N/A      |
| <b>Table 11 (SSI)<br/>Description for Field 11</b> | 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 ?                                                                                                                                           | N/A      |
| <b>Table 12 (SPI)<br/>Description for Field 12</b> | 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 ?                                                                                                                                           | N/A      |
| <b>Table 13 (DSM)<br/>Description for Field 4</b>  | 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?<br><br>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? | N/A      |
| <b>Table 16 (WCI)<br/>Description for Field 17</b> | 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 ?                                                                                                                                           | N/A      |

## Rule 021: Settlement System Code Rules questions

| Section                                                                 | Existing wording                                                                                                                                                     | Question                                                                                                                                                                                                                        | Response |
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|                                                                         | character is only for an asterisk as described in Section 9.4.6.3(2)(b).                                                                                             |                                                                                                                                                                                                                                 |          |
| <b>Table 25 (RSA)<br/>Description for Field 9</b>                       | 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 ?                                                                                                                           | N/A      |
| <b>Table 27 (TAA)<br/>Description for Field 9</b>                       | 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 ?                                                                                                                           | N/A      |
| <b>Additional Tables</b>                                                |                                                                                                                                                                      | Are there any additional tables that will require adjustment or clarifications to implement Alberta Time?                                                                                                                       | N/A      |
| <b>Section 9.6.6 Post-final adjustment mechanism (PFAM) transaction</b> |                                                                                                                                                                      | This section describes the roles and requirements related to post-final adjustments.<br><br>Will any requirements be impacted by the move to Alberta Time?                                                                      | N/A      |
| <b>Additional changes</b>                                               |                                                                                                                                                                      | Are there additional changes to Rule 021 required to implement Alberta Time?<br>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? | N/A      |

## Rule 028: Natural Gas Settlement System Code Rules questions

| Section                    | Existing wording                                                                                                                                                                                                                                            | Question                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Responses                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
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| 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. | <p>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."</p> <p>and</p> <p>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></p> <p>provide the necessary revisions to this section of Rule 028?</p> | <p>Apex Utilities Inc. (Apex) agrees in principle with the proposed Alberta Time revisions; however, the timing of meter reads relies on the "gas day" time convention (i.e., the start time for the gas day and the time zone under which the start time is defined).</p> <p>Metering and associated systems are currently configured based on the existing gas day time convention. As a result, any market decision to maintain or revise the gas day time convention may have implications for system configuration and meter read timestamps. Apex recommends that final amendments to this section be aligned with the broader market decision regarding the gas day time convention. As noted in the response to Section 8.4.6.3 below, Apex is seeking confirmation from market stakeholders (ICE NGX and NGTL) on the gas day time convention and will provide comments to the Commission once the information is available, which Apex expects to provide by the week of August 17, 2026.</p> |

## Rule 028: Natural Gas Settlement System Code Rules questions

| Section                                 | Existing wording                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Question                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Responses                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
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| <b>8.4.2 File naming convention</b>     | <p>(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:</p> <p>TRX_From_To_YYYYMMDDHHMISS.CSV or TRX_From_To_YYYYMMDDHHMISS.csv</p> <p>where,</p> <p>TRX Three-letter abbreviation for the transaction name (e.g. "SRR"). The three letters must be in upper case format.</p> <p>From ID of the sender, either distributor ID, retailer ID or settlement ID.</p> <p>To ID of the receiver, either distributor ID, retailer ID or settlement ID.</p> <p>YYYYMMDD Date the file was created.</p> <p>HHMISS Time the file was created on a 24-hour clock.</p> | <p>Are any changes required to this language?</p> <p>Is it compatible as-is with Alberta Time given the current reference to a 24-hour clock?</p>                                                                                                                                                                                                                                                                                                             | <p>Apex does not recommend any changes to Section 8.4.2.</p> <p>The file naming convention includes a date and timestamp expressed using a 24-hour clock but does not reference standard time, daylight time, or a specific time zone. As a result, the provision is compatible with Alberta Time and continues to function as intended without modification. Apex does not anticipate any operational impacts to transaction file naming conventions arising from the proposed change to permanent Alberta Time.</p>                                                                                                     |
| <b>Section 8.4.6.3 Time Conventions</b> | <p>(1) Clock time<br/>Times refer to times on the prevailing local clock, standard or daylight time depending on the season.</p> <p>(2) Adjusting for daylight saving<br/>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).</p>                                                                                                                                                                         | <p>If this section were removed, is any new language required in its place?</p> <p>For example:</p> <ul style="list-style-type: none"> <li>Require that historical data be maintained in the format (i.e. with the time standards) applicable at the time</li> <li>State that as of Nov 1, 2026, all data will be created within Alberta Time intervals (i.e., a consistent year round clock)?</li> <li>Revising the start and end of the gas day?</li> </ul> | <p>Apex recommends maintaining a section related to Time Conventions. If the market maintains references to Mountain Standard Time (UTC-7) for the gas day, Rule 028 will require language that clearly correlates those market definitions with Alberta Time (UTC-6) to avoid ambiguity.</p> <p><b>1. Historical Data</b><br/>Apex does not believe additional requirements are necessary for historical Rule 028 data. Settlement data is not exchanged or settled in hourly increments; the smallest settlement interval is a gas day. As a result, Apex does not anticipate impacts to historical settlement data</p> |

## Rule 028: Natural Gas Settlement System Code Rules questions

| Section | Existing wording | Question                                                                                                                                               | Responses                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
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|         |                  | <ul style="list-style-type: none"> <li>Clarify time convention or for any specific transactions? If so, please identify those transactions.</li> </ul> | <p>resulting from the transition to permanent Alberta Time.</p> <p><b>2. Data Created After the Transition to Alberta Time</b></p> <p>Apex agrees that Rule 028 should provide clarity regarding the time standard applied to future transactions and data.</p> <p>Recommended wording:</p> <p><i>"As of November 1, 2026, all transaction timestamps and data created under Rule 028 shall use Alberta Time (UTC-6), providing a consistent year-round clock."</i></p> <p><b>3. Gas Day Time Convention</b></p> <p>At this time, Apex is unable to recommend specific replacement language for Section 8.4.6.3 as there should be confirmation and alignment with the market stakeholders, including Intercontinental Exchange Natural Gas Exchange (ICE NGX) and NGTL regarding how the gas day will be defined under Alberta Time. Apex will provide additional comments to the Commission once that information is available, which Apex expects to provide by the week of August 17, 2026.</p> <p>Rule 028 and the NGTL General Terms and Conditions currently define the gas day as beginning at 8:00 a.m. Mountain Standard Time (MST) (UTC-7). With Alberta's proposed move to permanent Alberta Time (UTC-6), clarification is required from the broader natural gas market</p> |

## Rule 028: Natural Gas Settlement System Code Rules questions

| Section | Existing wording | Question | Responses                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|---------|------------------|----------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|         |                  |          | <p>as to whether the gas day time convention will be revised.</p> <p>Any amendments to Rule 028 should align with the market-standard gas day adopted by ICE NGX, NGTL, and other industry participants to ensure consistency across nominations, scheduling, balancing, and settlement processes.</p> <p><b>4. Time Conventions for Specific Transactions</b></p> <p>Apex has not identified any specific Rule 028 transactions that require unique time-convention treatment. However, to avoid ambiguity following the transition to permanent Alberta Time, Apex recommends a general statement that transaction timestamps are recorded using Alberta Time (UTC-6).</p> <p>Apex notes that certain transactions contain meter reading timestamps, such as Daily Cumulative Meter Consumption (DCM) transactions. Metering systems and associated applications are currently configured based on the existing gas day time convention, which references Mountain Standard Time (MST) (UTC-7). As a result, changes to the market-standard gas day time convention may have implications for meter reading timestamps and related transaction data.</p> <p>Also, please refer to Apex's response to Section 2.12 above.</p> |

## Rule 028: Natural Gas Settlement System Code Rules questions

| Section            | Existing wording | Question                                                                                                                                                                                                                                   | Responses                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|--------------------|------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Tables             |                  | Are there any tables that will require adjustment or clarifications to implement Alberta Time?                                                                                                                                             | Apex identified references within Table 4 (Wholesale settlement information transaction (WSI)), Table 6 (Wholesale settlement details transaction (WSD)), and Table 7 (Settlement profile value transaction (SPV)) to the gas day beginning at 08:00 standard time. At this time, Apex is unable to determine whether updates to these references will be required until the gas day time convention is confirmed by market stakeholders.                                                                                                                                                                                                                                                                         |
| Additional changes |                  | <p>Are there additional changes to Rule 028 required to implement Alberta Time?</p> <p>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?</p> | <p>Apex recommends that any references to Mountain Standard Time or Alberta Time include the corresponding Coordinated Universal Time (UTC) offset to eliminate ambiguity. For example:</p> <ul style="list-style-type: none"> <li>Mountain Standard Time (MST) (UTC-7)</li> <li>Alberta Time (UTC-6)</li> </ul> <p>The use of UTC references would provide a clear and consistent time standard and assist market participants in interpreting time-based requirements following the transition to permanent Alberta Time.</p> <p>In Apex's view, an appendix addressing the treatment of historical data is not required for Rule 028. Please refer to Apex's response to Section 8.4.6.3, Historical Data.</p> |