

Rules 021 and 028 questions

Comments from
(company/stakeholder name): ENMAX Corporation (ENMAX)

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

Contact name
(for companies): Nash Pillai

Phone:

Email:

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?	ENMAX does not believe any changes need to be made to the 24-hour clock standard. The format remains the same regardless of the change to Alberta Time. ENMAX notes for cumulative meter readings, it deems the meter reading time to 00:00:00 regardless of the time the meter reading was collected. ENMAX supports adding a definition of "Alberta Time" to section 1.1 of the key terms tied to the Official Time Act and regulations made under it. To avoid ambiguity, the rule should also clarify that this convention applies on and after the effective transition date, while historical meter-read and settlement records should remain in the time convention applicable when the data was originally created.
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?	ENMAX does not believe any changes need to be made to this section. The format follows the 24-hour clock standard and remains the same regardless of the change to Alberta Time. The same applies to section 9.4.2 File Naming Convention. Historical records should not be retroactively converted.
Section 9.4.6.3 Time Conventions	(1) Clock time	If this section were removed, is any new language required in its place?	ENMAX does not recommend simply deleting this section without replacement language.

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Section	Existing wording	Question	Response
	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 between 01:00:01 and 02:00:00 is labelled "02"; energy consumed in the following	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.	ENMAX agrees with the example language to include a bullet point stating that Alberta Time takes effect on Nov. 1, 2026, and that all data must follow the Alberta Time format. The existing time convention rules should remain, with clear wording that historical data restated before Nov. 1, 2026, must continue to follow the MST/MDT time convention. ENMAX notes its system may require update to be able to manage any replacement data that spans both time formats. ENMAX is working on the assumption that historical DIM corrections will adhere to the rules at the effective time.

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Section	Existing wording	Question	Response
	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 ?	A change should be made directly to Table 6 rather than relying only on Section 9.4.6.3. ENMAX suggests supporting historical transactions, the 3-character hour ending should remain the same i.e.'02*' and should remain valid for transactions prior to Nov 1, 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 ?	A change should be made directly to Table 7 rather than relying only on Section 9.4.6.3. ENMAX suggests supporting historical transactions, the 3-character hour ending should remain the same i.e.'02*' and should remain valid for transactions prior to Nov 1, 2026.
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 ?	A change should be made directly to Table 10 rather than relying only on Section 9.4.6.3. ENMAX suggests supporting historical transactions, the 3-character hour ending should remain the same i.e.'02*' and should remain valid for transactions prior to Nov 1, 2026.

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Section	Existing wording	Question	Response
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 ?	A change should be made directly to Table 11 rather than relying only on Section 9.4.6.3. ENMAX suggests supporting historical transactions, the 3-character hour ending should remain the same i.e. '02*' and should remain valid for transactions prior to Nov 1, 2026.
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 ?	A change should be made directly to Table 12 rather than relying only on Section 9.4.6.3. ENMAX suggests supporting historical transactions, the 3-character hour ending should remain the same i.e. '02*' and should remain valid for transactions prior to Nov 1, 2026.
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?	The instructions related to daylight-saving time should be removed or replaced. For new data after the transition, the field should identify hour-ending values for a standard Alberta Time day. A change should be made directly to Table 13 rather than relying only on Section 9.4.6.3. ENMAX suggests supporting historical transactions, the 3-character hour ending should remain the same i.e. '02*' and should remain valid for transactions prior to Nov 1, 2026.
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 ?	A change should be made directly to Table 16 rather than relying only on Section 9.4.6.3.

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Section	Existing wording	Question	Response
			ENMAX suggests supporting historical transactions, the 3-character hour ending should remain the same i.e. '02" and should remain valid for transactions prior to Nov 1, 2026. For applicable dynamic loss zones within historical periods, the asterisk is required.
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 ?	A change should be made directly to Table 25 rather than relying only on Section 9.4.6.3. ENMAX suggests supporting historical transactions, the 3-character hour ending should remain the same i.e. '02" and should remain valid for transactions prior to Nov 1, 2026.
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 ?	A change should be made directly to Table 27 rather than relying only on Section 9.4.6.3. ENMAX suggests supporting historical transactions, the 3-character hour ending should remain the same i.e. '02" and should remain valid for transactions prior to Nov 1, 2026.
Additional Tables		Are there any additional tables that will require adjustment or clarifications to implement Alberta Time?	The tables identified in the questionnaire should be revised directly so market participants do not need to infer changes solely from Section 9.4.6.3.
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?	PFAM requirements may be impacted where post-final adjustments relate to settlement periods before the transition date. The rule or accompanying appendix should state that PFAM transactions for pre-transition periods must use the time convention applicable to the original

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			settlement period, including legacy 23-hour or 25-hour treatment where applicable. ENMAX suggests supporting historical transactions, the 3-character hour ending should remain the same i.e. '02" and should remain valid for transactions prior to Nov 1, 2026.
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?	ENMAX recommends that the AUC add a short transition appendix or implementation note for Rule 021. The appendix should address: • effective transition date; • treatment of historical data; • treatment of reruns, estimates, corrections, and PFAM; and • a clear statement that no broader REM or TVR-related Rule 021 changes are being made in this engagement. This would reduce interpretation risk and support consistent implementation across market participants. ENMAX also requests a transition period that would extend to December 2026 to allow for comprehensive testing and validation, as well as a grace period if the required changes cannot be fully implemented by the effective date or corrections due to unexpected issues found post November 1.

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?	ENMAX supports revising this section to refer to Alberta Time using a 24-hour clock and supports adding a definition of "Alberta Time" tied to the Official Time Act and regulations made under it. As with Rule 021, the rule should clarify that the revised convention applies on and after the effective transition date and that historical meter-read and settlement records remain in the time convention applicable when created.
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?	No change appears required to the file naming convention or YYYYMMDDHHMISS format itself. The reference to a 24-hour clock remains compatible with Alberta Time. However, the rule should clarify that file creation time after the transition is Alberta Time. Historical files should retain their original creation timestamps and should not be renamed or converted solely because Alberta Time is implemented.

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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.	ENMAX recommends replacing, rather than removing, this section. Specifically, ENMAX proposes that Section 8.4.6.3 state the following: Alberta Time takes effect on November 1, 2026, and all data created on or after that date must use the Alberta Time format. The existing time convention requirements should remain for historical data. Historical data for periods before November 1, 2026, including any subsequent restatements must continue to follow the applicable MST/MDT convention.
Tables		Are there any tables that will require adjustment or clarifications to implement Alberta Time?	ENMAX recommends a review of all Rule 028 tables and transaction descriptions for references to time, timestamp, gas day, file creation time, standard time, daylight time, or local clock. Any affected tables should be revised directly rather than relying solely on a general time-convention section.
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?	ENMAX recommends a short transition appendix or implementation note for Rule 028. The appendix should address: definition of Alberta Time; effective transition date; treatment of historical gas settlement data; whether historical records remain in the original time convention; file creation timestamps; and the gas-day start/end convention after transition.

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Section	Existing wording	Question	Responses
			ENMAX also requests a transition period that would extend to December 2026 to allow for comprehensive testing and validation, as well as a grace period if the required changes cannot be fully implemented by the effective date or corrections due to unexpected issues found post November 1.