



AltaGas Utilities Inc.

Rule 028 Natural Gas Settlement System Code Exemption Extension

January 8, 2016

Alberta Utilities Commission

Decision 20885-D01-2016

AltaGas Utilities Inc.

Rule 028 Natural Gas Settlement System Code Exemption Extension

Proceeding 20885

January 8, 2016

Published by the:

Alberta Utilities Commission

Fifth Avenue Place, Fourth Floor, 425 First Street S.W.

Calgary, Alberta

T2P 3L8

Telephone: 403-592-8845

Fax: 403-592-4406

Website: www.auc.ab.ca

Contents

1	Introduction	1
2	Background	2
3	Rule 028 exemptions	3
3.1	Exemption extension request	4
4	Order	8
	Appendix 1 – Proceeding participants	11
	Appendix 2 – Summary of Commission directions	12

List of tables

Table 1.	Applied-for Rule 028 exemptions in Proceeding 3606	3
Table 2.	Select retailer notification transaction, Table 9, Sequence 8	4

1 Introduction

1. AltaGas Utilities Inc. filed an application with the Alberta Utilities Commission on September 29, 2015, requesting approval for an extension to the exemption from specific sections of Rule 028: *Natural Gas Settlement System Code Rules* granted in Decision 3606-D01-2015.¹ Specifically, AltaGas Utilities Inc. (AltaGas) applied for an extension to the exemption from sections 2.11, 8.6.1.1 and 8.6.5.3 from January 1, 2016, to December 31, 2018.

2. On September 30, 2015, the Commission issued a notice of application. Any party who wished to intervene in this proceeding was required to submit a statement of intent to participate (SIP) to the Commission by October 14, 2015. The Commission received a SIP from Direct Energy Marketing Limited (Direct Energy), in which it indicated that it may wish to file intervenor evidence in this proceeding.

3. By letter dated October 19, 2015, the Commission advised it would be considering the application by way of a *basic written process* and established the following process schedule:

Process step	Deadline
Information requests (IRs) issued to AltaGas	November 2, 2015
AltaGas response to IRs	November 16, 2015
Comments on need for intervenor evidence, argument and reply argument	November 19, 2015

4. Information requests were submitted by the Commission, and AltaGas submitted responses in accordance with the process schedule established.

5. On November 19, 2015, the Commission received a submission on further process from AltaGas stating that no additional process steps were required. Direct Energy did not file a submission addressing whether further process was required in the proceeding. By letter dated November 25, 2015, the Commission indicated that it had determined no further process would be required to complete the record of this proceeding. Accordingly, the Commission considers the record of this proceeding to have closed on November 16, 2015.

6. In reaching the determinations set out within this decision, the Commission has considered all relevant materials comprising the record of this proceeding. Accordingly, references in this decision to specific parts of the record are intended to assist the reader in

¹ Decision 3606-D01-2015: AltaGas Utilities Inc., Rule 028 Natural Gas Settlement System Code Exemption, Proceeding 3606, Application 1611127-1, March 11, 2015, paragraph 41.

understanding the Commission's reasoning relating to a particular matter and should not be taken as an indication that the Commission did not consider all relevant portions of the record with respect to that matter.

2 Background

7. Rule 028 is an operational document that defines the business processes and mechanics of how natural gas settlement is to be carried out at the natural gas retail market level in Alberta. The amendments to Rule 028 are developed through a consultative process with industry representatives. AltaGas is one of those industry representatives.

8. On November 21, 2013, Bulletin 2013-25² was issued, inviting interested parties to submit written comments regarding the proposed version 1.3 of Rule 028. Prior to Bulletin 2013-25 being issued, and during a consultative process with the AUC and other market participants, AltaGas identified a discrepancy in the profiling classes it uses for natural gas settlement compared to the requirements in Rule 028.³ During the Rule 028 version 1.3 consultative process, AltaGas added a Rule Issue Management (RIM) discussion to allow retailers the ability to provide feedback on the profiling class discrepancy.⁴

9. On January 15, 2014, the Commission issued Bulletin 2014-02,⁵ which approved version 1.3 of Rule 028, effective January 26, 2014. After Rule 028 version 1.3 became effective, AltaGas indicated during a further Rule 021 and Rule 028 industry consultation meeting that it would be unable to comply with certain sections of Rule 028 related to the Select Retailer Notification (SRN) and Wholesale Settlement Details (WSD) profiling classes.⁶ At the meeting, AltaGas also indicated that it would not be compliant with sections 2.11 and 8.6.1.1 of Rule 028 as a result of when AltaGas deems its meter reads.⁷

10. At subsequent industry consultation meetings during 2014, AltaGas worked with retailers to identify workarounds to its non-compliances with Rule 028. On August 18, 2014, the Commission approved version 1.4 of Rule 028, effective August 19, 2014. In the October 1, 2014 industry consultation meeting, Commission staff suggested that AltaGas apply for an exemption to the sections of Rule 028 that it was in non-compliance with until such time as it was able to fully comply.⁸

11. On December 24, 2014, AltaGas applied for an exemption to the sections of Rule 028 that it was in non-compliance with for the period of January 26, 2014, to December 31, 2015.⁹ In its application, AltaGas indicated that it would become compliant with Rule 028 in three to five years, following the implementation of a new customer information system (CIS).

² Bulletin 2013-25, Stakeholder consultation on Rule 028, November 21, 2013.

³ Exhibit 20885-X0001, application attachment 1, page 7, October 31, 2013 meeting notes.

⁴ Decision 3606-D01-2015, paragraph 8.

⁵ Bulletin 2014-02, Rule 028: Natural Gas Settlement System Code Rules, January 15, 2014.

⁶ Exhibit 20885-X0001, application attachment 1, page 5.

⁷ Decision 3606-D01-2015, paragraph 9.

⁸ Exhibit 20885-X0001, application attachment 1, page 31, October 1, 2014 industry consultation meeting.

⁹ Decision 3606-D01-2015, paragraph 1. Note: In the application to Proceeding 3606, AltaGas also referred to an exemption to Section 7.4 – Changes in profiling class. Subsequently, in response to a Commission information request in Exhibit 3606-X0003, AUI-AUC-2015JAN22-005(a), AltaGas confirmed that it did not require an exemption to this section.

The exemptions would allow AltaGas to avoid the time and expenses associated with implementing temporary solutions to address its non-compliance with certain sections of Rule 028 pending the implementation of its CIS.¹⁰ In Proceeding 3606, AltaGas stated that after the applied-for exemption expiry date of December 31, 2015, it would apply annually to extend the exemption until compliance with Rule 028 was achieved.¹¹

3 Rule 028 exemptions

12. In Decision 3606-D01-2015, the Commission approved exemptions from the following sections of Rule 028 until December 31, 2015:

Table 1. Applied-for Rule 028 exemptions in Proceeding 3606

Section	Title
2.11	Timing of meter reads
8.6.1.1(1)(b)	Daily cumulative meter (DCM) consumption transaction – process rules and content.
8.6.3.2, Table 9, Sequence 8 Profiling Class	Select retailer notification (SRN) transaction content

13. The guidelines for the timing of meter reads set out in Section 2.11 of Rule 028 state that a distributor can report the timing of a meter read as the actual time the meter was read or a consistent deemed meter read time on the date the meter was read.¹² Section 8.6.1.1 outlines the process rules and content for the DCM transaction, which includes requirement 1(b) that the *Current Reading Date Time* field of the DCM transaction must be the actual date and time of the meter read, or a deemed time value with the date of the actual meter read.¹³

14. AltaGas sought an exemption to these sections of Rule 028 because it is unable to provide the actual meter read time and date. Instead, AltaGas presents the date of the meter read as the next day following the day the meter was actually read, and deems the meter read time as 00:00:00. AltaGas explained that it was advised through its discussions with retailers that there would be little or no impact if AltaGas were to continue to be non-compliant with these sections of Rule 028 until a new CIS was implemented.¹⁴

15. In approving the exemption from sections 2.11 and 8.6.1.1(1)(b) from Rule 028, the Commission found:

24. No parties registered as interveners in this proceeding, and the Commission notes that, at this time, it is not aware of any major impacts to retailers as a result of AltaGas deferring changes to correct its deemed time issue for the applied for period of January 26, 2014, to December 31, 2015. Accordingly, the Commission approves AltaGas' requested exemption from Section 2.11 and Section 8.6.1.1(1)(b) of Rule 028 for the period January 26, 2014, to December 31, 2015.¹⁵

¹⁰ Decision 3606-D01-2015, paragraph 11.

¹¹ Decision 3606-D01-2015, paragraph 14.

¹² Rule 028, Section 2.11.

¹³ Rule 028, Section 8.6.1.1(1)(b).

¹⁴ Decision 3606-D01-2015, paragraph 18.

¹⁵ Decision 3606-D01-2015, paragraph 24.

16. In Proceeding 3606, AltaGas also sought an exemption from Section 8.6.3.2, Table 9, Sequence 8 because it is incorrectly populating the profiling class in the SRN transaction. Furthermore, the profiling class data that AltaGas publishes in the SRN is different from the profiling class data published in the WSD. Specifically, Section 8.6.3.2, Table 9, Sequence 8 describes the standard for presenting the profiling class in the SRN transaction:

Table 2. Select retailer notification transaction, Table 9, Sequence 8

Sequence	Field	Data type/size	Description
8	Profiling Class	Varchar(20)	Conditional field – If Enrolment Notification Code field = “0000” this field is mandatory; otherwise this field is [null].

17. A profiling class is a group of sites that will be settled using a common profile. A profile is defined by a series of consumption amounts for each interval over a particular time period.¹⁶ In Proceeding 3606, AltaGas explained that the SRN profiling class is based on its distribution service rate classes, whereas the WSD profiling class is based on the distribution service rate classes and other consumption characteristics. The result is the SRN profiling class data is incorrect and has to be aligned for the billing system and load settlement system.¹⁷

18. Section 8.6.5.3 contains the process rules for notifying retailers of a change in profiling class, giving AltaGas the option of issuing a site profile change (SPC) transaction or an email to transmit the site profiling class data to retailers. Because there is an inconsistency in the profiling classes between the SRN and WSD, AltaGas developed a manual process to advise retailers of the correct profiling class. AltaGas will send an email to the retailer with the most current and accurate profiling class information, or alternatively, if preferred by the retailer, AltaGas will send an SPC transaction.¹⁸

19. The Commission approved AltaGas’ request for exemption from Section 8.6.3.2, Table 9, Sequence 8, subject to AltaGas providing a timely email or SPC to retailers confirming the correct profiling class, on the basis that the Commission was not aware at the time of any major impacts to retailers.¹⁹

3.1 Exemption extension request

20. AltaGas was directed in Decision 3606-D01-2015 to apply for future Rule 028 exemptions by October 1 of the year before the exemption was required. As such, AltaGas submitted this current exemption application on September 29, 2015, and requested an extension to the exemption for the period of January 1, 2016, to December 31, 2018. The extension request is for the sections of Rule 028 presented in Table 1. AltaGas explained that it still expects to be compliant with Rule 028 on or before mid-2019, following its CIS replacement.²⁰

21. AltaGas maintained that approval of the exemptions until the time at which it expects to be fully compliant with Rule 028 allows AltaGas to avoid the significant time and costs that

¹⁶ Rule 028, page 7.

¹⁷ Decision 3606-D01-2015, paragraph 26.

¹⁸ Decision 3606-D01-2015, paragraph 28.

¹⁹ Decision 3606-D01-2015, paragraph 35.

²⁰ Exhibit 20885-X0002, AltaGas Rule 028 exemption extension application, paragraph 4.

would be required to implement temporary solutions. AltaGas further explained that the exemptions would also minimize the overall cost impact to consumers.²¹

22. In Decision 3606-D01-2015, the Commission directed AltaGas to continue to discuss the viability of its proposed workarounds with retailers and identify any new issues raised by retailers with respect to AltaGas' non-compliance in future Rule 028 exemption applications.²²

23. Regarding the exemption requested for sections 2.11 and 8.6.1.1(1)(b) of Rule 028, AltaGas confirmed that since approval was first given in Decision 3606-D01-2015, there had been no changes in the status of the non-compliance. AltaGas reiterated that to become compliant before its CIS replacement is complete in mid-2019, extensive market participant testing and reviews of process would be required.²³ AltaGas further confirmed that it was unaware of any changes regarding the impacts to retailers of its non-compliance with sections 2.11 and 8.6.1.1(1)(b) of Rule 028.²⁴

24. With respect to the requested exemption from Section 8.6.3.2, Table 9, Sequence 8 Profiling Class of Rule 028, AltaGas stated that there has been no change in status of the non-compliance since Decision 3606-D01-2015. Furthermore, AltaGas confirmed that the manual workaround whereby AltaGas sends the correct profiling class via email or SPC transaction to retailers remains in place.²⁵

25. AltaGas stated that it has ongoing communication with retailers regarding the viability of existing workarounds, and that no issues or concerns had been raised by retailers.²⁶ Specifically, AltaGas explained that in September 2015 it sent emails to all the retailers in its service territory to review the inconsistency in the profiling class data published in the WSD and SRN. In the email, AltaGas outlined the workaround options of email or SPC transaction, available to retailers, to receive the correct information, and inquired whether retailers were satisfied with their current choice. At the time of its IR responses to the Commission, AltaGas had not received any feedback indicating that retailers were dissatisfied with the workaround options.²⁷

26. In an IR response to the Commission, AltaGas further confirmed that it was not aware of any retailer concerns, complaints or issues resulting from its non-compliances with Rule 028 for which it is seeking an exemption extension.²⁸

27. With respect to AltaGas' non-compliance with Section 8.6.3.2, Table 9, Sequence 8, a pre-final error correction (PFEC) request could potentially result from the inconsistency in the SRN and WSD profiling class information; however, AltaGas' manual workaround is expected to limit the number of PFECs received. Section 5.2.1 of Rule 028 lists the errors eligible for correction through the PFEC process, and specifically item (2)(d) on that list states:

- incorrect profiling class assigned in the SRN and/or WSD
- SRN profiling class \neq WSD profiling class²⁹

²¹ Exhibit 20885-X0002, AltaGas Rule 028 exemption extension application, paragraph 5.

²² Decision 3606-D01-2015, paragraph 38.

²³ Exhibit 20885-X0002, AltaGas Rule 028 exemption extension application, paragraph 7.

²⁴ Exhibit 20885-X0002, AltaGas Rule 028 exemption extension application, paragraph 9.

²⁵ Exhibit 20885-X0002, AltaGas Rule 028 exemption extension application, paragraphs 11 and 13.

²⁶ Exhibit 20885-X0002, AltaGas Rule 028 exemption extension application, paragraph 15.

²⁷ Exhibit 20885-X0009, AUI-AUC-2015NOV02-001(a).

²⁸ Exhibit 20885-X0009, AUI-AUC-2015NOV02-001(b).

28. Accordingly, the Commission, at paragraph 37 of Decision 3606-D01-2015, directed AltaGas to:

37. ... include in any subsequent Rule 028 exemption applications for Section 8.6.3.2, Table 9, Sequence 8 Profiling Class a description of the number of PFECs received in regards to Section 5.2.1(d) and reasons for why the exemption did not limit the need for PFECs.³⁰

29. AltaGas responded at paragraph 14 of its application that it had received no PFECs related to Section 5.2.1(2)(d) of Rule 028.³¹

30. Furthermore, in Decision 3606-D01-2015, the Commission directed AltaGas to provide updates on the planning and implementation of its new CIS given that AltaGas indicated it would achieve Rule 028 compliance by mid-2019 following the system replacement. The Commission also directed AltaGas to explain in any future exemption applications any change to the current expected full Rule 028 compliance timeline.³²

31. In its application, AltaGas provided an update regarding the planning and implementation of its CIS system.³³ In addition, in an IR response to the Commission, AltaGas provided further details regarding the timeline of its CIS replacement, including significant milestones and the expected phase completion dates.³⁴ Overall, AltaGas confirmed that the expected compliance date for Rule 028 remained mid-2019.³⁵

Commission findings

32. The Commission previously approved exemptions from sections 2.11 and 8.6.1.1(1)(b) and Section 8.6.3.2, Table 9, Sequence 8 of Rule 028 until December 31, 2015. While the exemption request by AltaGas was approved in Decision 3606-D01-2015, the Commission issued a number of directions to AltaGas specific to future Rule 028 exemption applications. As discussed above, these directions were addressed by AltaGas in its application and IR responses and the Commission is satisfied that AltaGas has complied with them.

33. As discussed earlier in Section 3, the Commission approved the exemptions from sections 2.11 and 8.6.1.1(1)(b) on the basis that it was not aware of major impacts to retailers resulting from AltaGas' non-compliance. In addition, regarding Section 8.6.3.2, Table 9, Sequence 8, the Commission stated that it was unaware of major impacts to retailers, subject to AltaGas sending a timely email or SPC transaction to retailers to confirm the correct profiling class.

34. Similarly, in this proceeding, the Commission is not aware of any major impacts to retailers resulting from AltaGas' non-compliance with the sections of Rule 028 for which it is seeking an exemption extension, subject to the timely provision of the email or SPC to the retailers to confirm the correct site profiling class. Furthermore, only one party, Direct Energy,

²⁹ Rule 028, Section 5.2.1(2)(d), page 14.

³⁰ Decision 3606-D01-2015, paragraph 37.

³¹ Exhibit 20885-X0002, AltaGas Rule 028 exemption extension application, paragraph 14.

³² Decision 3606-D01-2015, paragraph 39.

³³ Exhibit 20885-X0002, AltaGas Rule 028 exemption extension application, paragraph 16.

³⁴ Exhibit 20885-X0009, AUI-AUC-2015NOV02-002(f).

³⁵ Exhibit 20885-X0002, AltaGas Rule 028 exemption extension application, paragraph 16.

registered to intervene in the proceeding and it did not submit any IRs to AltaGas or request further process in the proceeding.

35. AltaGas' evidence in this proceeding suggests that approval of the exemptions until it is able to achieve full compliance with Rule 028 by mid-2019 will avoid the significant time and costs required to implement temporary solutions and will therefore minimize the cost impact to customers. Given this evidence, the Commission considers that denying the request for an extension to the exemptions from Rule 028 would not be in the public interest.

36. In Decision 3606-D01-2015, the Commission approved an exemption until December 31, 2015, with the expectation that AltaGas would apply annually for extensions until it was fully compliant with Rule 028. When the Commission issued that decision, AltaGas' expected date for full compliance with Rule 028 was mid-2019. AltaGas' expected timeline for compliance has not changed. However, AltaGas is no longer requesting annual exemption extensions. It is instead requesting that the exemption be effective until December 31, 2018.

37. It is important for all natural gas market participants to be compliant with Rule 028 and, in general, exemptions should be short term in nature. However, in light of the evidence in this proceeding, the Commission finds that AltaGas' request for an extension of the exemptions to December 31, 2018, will reduce regulatory burden and avoid temporary costs to AltaGas and its customers and is therefore reasonable.

38. The Commission accordingly grants to AltaGas exemptions from Section 2.11, Section 8.6.1.1(b), and Section 8.6.3.2, Table 9, Sequence 8 of Rule 028 until December 31, 2018.

39. Although it is approving the exemptions until December 31, 2018, the Commission nonetheless expects regular information updates on AltaGas' work towards compliance with Rule 028.

40. Similar to the direction set out at paragraph 37 of Decision 3606-D01-2015, with respect to the exemption from Section 8.6.3.2, Table 9, Sequence 8 Profiling Class, the Commission directs AltaGas to provide, with its Rule 002: *Service Quality and Reliability Performance Monitoring and Reporting for Owners of Electric Distribution Systems and for Gas Distributors* annual report, the number of PFECs received in regard to Section 5.2.1(2)(d) and, if applicable, the reasons why the manual workaround did not eliminate PFECs.

41. The Commission further expects that AltaGas will continue to have regular discussions with the retailers in its service territory on the viability of the proposed workaround and any other Rule 028 non-compliance issues that may arise. To that effect, it directs AltaGas to identify, when it files its Rule 002 annual report, any new issues retailers have raised with respect to AltaGas' Rule 028 non-compliances and any mitigation measures that AltaGas has taken. AltaGas is also directed to report any potential customer dissatisfaction resulting from its non-compliance with Rule 028 that it becomes aware of during the time period covered by the exemption.

42. The Commission is granting AltaGas' request for exemptions from Rule 028 until December 31, 2018, on the basis that AltaGas expects to be fully compliant with Rule 028 on or before mid-2019. Accordingly, AltaGas is directed to confirm in its Rule 002 annual report that

it is still on schedule to be compliant by June 30, 2019, and to include specific details on the steps it has taken to become compliant.

43. In Decision 20428-D01-2015, the Commission set out reporting requirements to monitor AltaGas' non-compliance with Rule 004: *Alberta Tariff Billing Code Rules*. In that decision, the Commission directed AltaGas to file specific information on an annual basis when it files its Rule 002 annual report.³⁶ The Commission directs the information requirements related to Rule 028 discussed above to be submitted with AltaGas' Rule 002 annual report and the Rule 004 non-compliance reporting requirements set out in Decision 20428-D01-2015.

44. Should the Commission become aware that any aspect of the exemption is creating negative impacts, such as workarounds creating unanticipated consequences, or that significant progress is not being made towards compliance, it may reassess the continuing viability of the exemption or impose further conditions on AltaGas.

4 Order

45. It is hereby ordered that:

- (1) AltaGas is granted a temporary exemption extension from the requirements of Section 2.11, Section 8.6.1.1(1)(b), and Section 8.6.3.2, Table 9, Sequence 8 of Rule 028 until December 31, 2018.
- (2) AltaGas is directed to monitor and report to the Commission on an annual basis, simultaneous with its Rule 002 annual report, the following:
 - (i) the number of PFECs received in regard to Section 5.2.1(2)(d) and if applicable, the reasons why the manual workaround did not eliminate PFECs;
 - (ii) any new issues retailers have raised with respect to AltaGas' Rule 028 non-compliances and any mitigation measures that AltaGas has taken;
 - (iii) any potential customer dissatisfaction resulting from its non-compliance with Rule 028 that AltaGas becomes aware of during the time period covered by the exemption;
 - (iv) that it is still on schedule to be compliant by June 30, 2019, and to include specific details on the steps it has taken to become compliant.

³⁶ Decision 20428-D01-2015, paragraph 57.

Dated on January 8, 2016.

Alberta Utilities Commission

(original signed by)

Anne Michaud
Commission Member

Appendix 1 – Proceeding participants

Name of organization (abbreviation) Name of counsel or representative
AltaGas Utilities Inc. (AltaGas)
Direct Energy Marketing Limited (Direct Energy)

Alberta Utilities Commission
Commission panel A. Michaud, Commission Member
Commission staff K. Kellgren (Commission counsel) J. Work P. Howard A. Corsi A. Laroia

Appendix 2 – Summary of Commission directions

This section is provided for the convenience of readers. In the event of any difference between the directions in this section and those in the main body of the decision, the wording in the main body of the decision shall prevail.

1. Similar to the direction set out at paragraph 37 of Decision 3606-D01-2015, with respect to the exemption from Section 8.6.3.2, Table 9, Sequence 8 Profiling Class, the Commission directs AltaGas to provide, with its Rule 002: *Service Quality and Reliability Performance Monitoring and Reporting for Owners of Electric Distribution Systems and for Gas Distributors* annual report, the number of PFECs received in regard to Section 5.2.1(2)(d) and, if applicable, the reasons why the manual workaround did not eliminate PFECs..... Paragraph 40
2. The Commission further expects that AltaGas will continue to have regular discussions with the retailers in its service territory on the viability of the proposed workaround and any other Rule 028 non-compliance issues that may arise. To that effect, it directs AltaGas to identify, when it files its Rule 002 annual report, any new issues retailers have raised with respect to AltaGas' Rule 028 non-compliances and any mitigation measures that AltaGas has taken. AltaGas is also directed to report any potential customer dissatisfaction resulting from its non-compliance with Rule 028 that it becomes aware of during the time period covered by the exemption. Paragraph 41
3. The Commission is granting AltaGas' request for exemptions from Rule 028 until December 31, 2018, on the basis that AltaGas expects to be fully compliant with Rule 028 on or before mid-2019. Accordingly, AltaGas is directed to confirm in its Rule 002 annual report that it is still on schedule to be compliant by June 30, 2019, and to include specific details on the steps it has taken to become compliant. Paragraph 42
4. In Decision 20428-D01-2015, the Commission set out reporting requirements to monitor AltaGas' non-compliance with Rule 004: *Alberta Tariff Billing Code Rules*. In that decision, the Commission directed AltaGas to file specific information on an annual basis when it files its Rule 002 annual report. The Commission directs the information requirements related to Rule 028 discussed above to be submitted with AltaGas' Rule 002 annual report and the Rule 004 non-compliance reporting requirements set out in Decision 20428-D01-2015..... Paragraph 43
5. It is hereby ordered that:
 - (1) AltaGas is granted a temporary exemption extension from the requirements of Section 2.11, Section 8.6.1.1(1)(b), and Section 8.6.3.2, Table 9, Sequence 8 of Rule 028 until December 31, 2018.
 - (2) AltaGas is directed to monitor and report to the Commission on an annual basis, simultaneous with its Rule 002 annual report, the following:
 - (i) the number of PFECs received in regard to Section 5.2.1(2)(d) and if applicable, the reasons why the manual workaround did not eliminate PFECs;
 - (ii) any new issues retailers have raised with respect to AltaGas' Rule 028 non-compliances and any mitigation measures that AltaGas has taken;

- (iii) any potential customer dissatisfaction resulting from its non-compliance with Rule 028 that AltaGas becomes aware of during the time period covered by the exemption;
- (iv) that it is still on schedule to be compliant by June 30, 2019, and to include specific details on the steps it has taken to become compliant.....Paragraph 45