



**ATCO Gas and Pipelines Ltd.**

**2018 Unaccounted-For Gas Rider D**

**October 25, 2018**

**Alberta Utilities Commission**

Decision 23838-D01-2018

ATCO Gas and Pipelines Ltd.

2018 Unaccounted-For Gas Rider D

Proceeding 23838

October 25, 2018

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## **1 Decision**

1. For the reasons set out in this decision, the Alberta Utilities Commission approves the unaccounted-for gas (UFG) Rider D rate of 0.766 per cent, effective November 1, 2018, for ATCO Gas, a division of ATCO Gas and Pipelines Ltd. The Commission finds that the UFG rate should continue to be calculated annually and the request for a  $\pm 0.25$  per cent tolerance band is denied.

## **2 Introduction and procedural summary**

2. On August 21, 2018, ATCO Gas filed an application requesting approval of the UFG Rider D rate of 0.766 per cent for 2018-2019, in effect from November 1, 2018 to October 31, 2019. ATCO Gas also requested approval for future Rider D rates to remain in place on a continuous basis if UFG calculations are within  $\pm 0.25$  per cent of the currently approved Rider D rate.<sup>1</sup>

3. On August 21, 2018, the Commission issued a notice of application asking interested parties to register their concerns or support for the application by September 4, 2018. The Commission did not receive any statements of intent to participate.

4. The Commission sought further clarification on this application and issued information requests (IRs) to ATCO Gas on September 18, 2018. ATCO Gas submitted its responses on September 25, 2018.

5. On September 21, 2018, the Commission received a late request from the Consumers' Coalition of Alberta (CCA) to participate. The CCA filed a letter with the Commission on September 26, 2018, requesting permission to file argument and reply argument. The CCA indicated it did not wish to ask IRs or extend the proceeding schedule.

6. ATCO Gas filed a letter commenting on the CCA's request on September 27, 2018. ATCO Gas took no issue with the CCA's proposal for argument and reply argument. ATCO Gas stated that it did not intend to file argument, but wished to reserve the opportunity to reply to the CCA through reply argument. ATCO Gas also requested that the Commission approve the Rider D rate by October 25, 2018.

7. The CCA's request to participate and to file written argument and reply argument was granted by the Commission. The CCA provided written argument on October 4, 2018.

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<sup>1</sup> Exhibit 23838-X0001, application, paragraphs 1 and 3.

8. ATCO Gas provided reply argument on October 11, 2018. Therefore, the Commission considers that the record of this proceeding closed on October 11, 2018. The application has been considered by way of a *minimal written process* as described in Bulletin 2015-09.<sup>2</sup>

9. In reaching the determinations contained in 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 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.

### 3 Background

10. Charges for UFG are recovered in-kind from all shippers on the ATCO Gas distribution system, including the default supply providers by way of a Rider D. For example, should the Commission approve ATCO Gas's proposed Rider D rate of 0.766 per cent, all retailer and default supply provider customers utilizing distribution access service for delivering gas off the ATCO Gas distribution system will be assessed a distribution UFG charge of 0.766 per cent at the point of delivery.<sup>3</sup> In other words, all retailer and default supply provider customers must effectively buy an extra 0.766 per cent of natural gas in order to zero-balance their receipts and deliveries on the ATCO Gas system.

11. ATCO Gas's north and south systems utilize a three calendar year average of physical measurement data to determine UFG, a method that was approved for both ATCO Gas North and ATCO Gas South by the Commission in Decision 2009-183.<sup>4</sup>

12. In Decision 2013-380, the Commission approved a single, province-wide UFG rate and Rider D because ATCO Gas was planning to implement a single load balancing deferral account (LBDA).<sup>5</sup>

13. Load balancing is part of the physical operation of a gas pipeline system, whereby gas supplies are adjusted to maintain optimum operating pressure in the system. In Order U2008-290,<sup>6</sup> the Commission approved the implementation by ATCO Gas of its retailer service which transferred the responsibility for the distribution system load balancing function from Direct Energy Regulated Services to ATCO Gas, effective October 1, 2008. This implementation included the creation of LBDAs for each of ATCO Gas's north and south service territories.<sup>7</sup>

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<sup>2</sup> Bulletin 2015-09, Performance standards for processing rate-related applications, March 26, 2015.

<sup>3</sup> Exhibit 23838-X0001, application, Attachment 2.

<sup>4</sup> Decision 2009-183: ATCO Gas (A Division of ATCO Gas and Pipelines Ltd.), 2009-2010 Unaccounted for Gas Rates – Rider "D," Proceeding 282, Application 1605369-1, October 23, 2009.

<sup>5</sup> Decision 2013-380: ATCO Gas Rider D Application for Unaccounted for Gas, Proceeding 2796, Application 1609860-1, October 16, 2013, paragraph 25.

<sup>6</sup> Order U2008-290: ATCO Gas, Retailer Service and Gas Utilities Act – Phase II, Part B Process, Modules 3 & 5, Proceeding 68, Application 1575607-1, September 12, 2008.

<sup>7</sup> Decision 2014-078: ATCO Gas, a division of ATCO Gas and Pipelines Ltd., Application for Administration of a Province-Wide Load Balancing Deferral Account, Proceeding 3005, Application 1610221-1, April 3, 2014, paragraph 9.

The administration of ATCO Gas's load balancing through a province-wide deferral account was approved by the Commission in Decision 2014-078.<sup>8</sup>

14. In Decision 22889-D01-2017, the Commission approved the use of the LBDA to recover the expense associated with the carbon levy.<sup>9</sup> In the same decision, the Rider D rate for 2017-2018 was approved at 0.888 per cent.<sup>10</sup>

## 4 Discussion of issues

### 4.1 Calculation of Rider D

15. In its application, ATCO Gas explained that, consistent with previous Rider D applications, it calculated its Rider D rate using measurement data from the preceding three years, in this case from January 2015 to December 2017. ATCO Gas then averaged the UFG percentages for 2015, 2016 and 2017 to determine the Rider D rate for 2018, as set out in Table 1:<sup>11</sup>

**Table 1. Annual UFG percentages and the calculation of the proposed 2018 Rider D**

	UFG percentage
2015	0.908
2016	0.565
2017	0.824
Three-year average	0.766

Source: Exhibit 23838-X0001, application, paragraph 6, Table 1.

### 4.2 ATCO Gas's future Rider D applications

16. ATCO Gas proposed that future approved Rider D rates remain in place on a continuous basis if future three-year average UFG calculations are within  $\pm 0.25$  per cent of the currently approved Rider D rate. In these cases, ATCO Gas proposed to notify the Commission that the current Rider D rate continued to be in place and provide the supporting calculation similar to the calculation filed in Attachment 1 of the current application. ATCO Gas proposed that it would file this notification through a letter submission in August of each year and indicated that it expected these letter submissions would follow the "no notice" proceeding process identified in the AUC's Bulletin 2015-09. If the three-year average UFG was not within the  $\pm 0.25$  per cent tolerance band, ATCO Gas would apply for an updated Rider D through an application similar in format and timing to the current application.

<sup>8</sup> Decision 2014-078, paragraph 38.

<sup>9</sup> Decision 22889-D01-2017: ATCO Gas and Pipelines Ltd., 2017-2018 Unaccounted-For Gas Rider D, Proceeding 22889, October 13, 2017, paragraph 34.

<sup>10</sup> Decision 22889-D01-2017, paragraph 26.

<sup>11</sup> Exhibit 23838-X0001, application, paragraphs 4 and 6.

17. ATCO Gas indicated the change to the UFG methodology would promote regulatory efficiency and reduce the number of changes to Rider D. Deviations between actual and approved UFG would continue to accrue to the LBDA.<sup>12</sup>
18. In response to a Commission IR, ATCO Gas indicated that it chose  $\pm 0.25$  per cent as a tolerance band as it “resulted in a conservative reduction to the number of regulatory filings.”<sup>13</sup> ATCO Gas did not review other methodologies.<sup>14</sup>
19. In response to a Commission IR, ATCO Gas stated that it had not canvassed retailers or customers with respect to the proposed UFG methodology.<sup>15</sup>
20. In its argument, the CCA indicated that it did not object to the UFG rate proposed by ATCO Gas for the period November 1, 2018 to October 31, 2019, noting that the UFG rate was a reduction from the 0.888 per cent rate currently in place.<sup>16</sup>
21. The CCA argued, however, that the Commission should reject ATCO Gas’s request for future Rider D rates to remain in place on a continuous basis if UFG calculations are within  $\pm 0.25$  per cent of the currently approved Rider D rate.<sup>17</sup> The CCA expressed concern regarding the financial impact of over-recovering (or under-recovering) the UFG for the period until a deviation outside the 0.25 per cent band occurs.<sup>18</sup> The CCA also noted that the ATCO Gas system is undergoing significant changes due to what the CCA described as unprecedented expenditures in several areas, including line heater replacement, pipe replacement, and gate station modification or replacement supporting the Urban Pipeline Replacement (UPR) Project. As a result, the CCA contended that it is not possible to predict with any degree of certainty what the future UFG rate may be. Based on these uncertainties related to the future magnitude of the UFG rate and cost implications to the customer base, the CCA recommended that the UFG rate be recalculated and filed as is currently required.<sup>19</sup>
22. In its reply argument, ATCO Gas responded to the CCA’s concern regarding the potential financial impact of over- or under-recovery until a deviation outside of the 0.25 per cent tolerance occurs. ATCO Gas stated that this should not be a concern, as variances between the UFG experienced on the system and Rider D volumes provided by retailers are accrued to the LBDA. ATCO Gas indicated that the deferral process would continue regardless of whether a  $\pm 0.25$  per cent tolerance on the Rider D rate was approved.<sup>20</sup>
23. ATCO Gas noted that one potential scenario arising from years of over- or under-recovery under its proposal might be the need for an LBDA rider application; however, this may

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<sup>12</sup> Exhibit 23838-X0001, application, paragraphs 7-10.

<sup>13</sup> Exhibit 23838-X0008, AG-AUC-2018SEP18-001(a).

<sup>14</sup> Exhibit 23838-X0008, AG-AUC-2018SEP18-001(d).

<sup>15</sup> Exhibit 23838-X0008, AG-AUC-2018SEP18-003(a).

<sup>16</sup> Exhibit 23838-X0012, CCA argument, paragraph 5.

<sup>17</sup> Exhibit 23838-X0012, CCA argument, paragraph 14.

<sup>18</sup> Exhibit 23838-X0012, CCA argument, paragraph 13.

<sup>19</sup> Exhibit 23838-X0012, CCA argument, paragraph 14.

<sup>20</sup> Exhibit 23838-X0013, AG reply argument, paragraphs 7-8.



or may not occur because positive and negative impacts from UFG could net themselves out over time.<sup>21</sup>

24. ATCO Gas reiterated that it believed that the test is whether regulatory efficiencies can be achieved for the benefit of all stakeholders without causing material impacts to customer rates. ATCO Gas noted that no interveners participated in the past three Rider D applications, signalling that minor changes to the Rider D rate do not require a regulatory process.<sup>22</sup>

#### 4.3 Compliance with previous Commission directions

25. The Commission issued several directions to ATCO Gas in respect of the Rider D rate in previous decisions. Recently, in Decision 22889-D01-2017,<sup>23</sup> it directed ATCO Gas as follows:

30. Because of the unpredictable nature of UFG and the need to control UFG through a rigorous monitoring and mitigation program, the Commission remains of the view that it is important for ATCO Gas to continue to track its system's UFG, explain any increase in UFG and take steps to reduce its impact. Accordingly, consistent with Decision 21905-D01-2016,<sup>24</sup> the Commission directs ATCO Gas to continue to provide the following in future Rider D applications:

- Clear explanations of seasonal UFG differences, measurement corrections and reasons for UFG increases or decreases.
- Information on practices and procedures it has employed to reduce UFG.

31. The Commission also directs ATCO Gas to continue with the direction found at page 7 of Decision 2008-105<sup>25</sup> and provide details with respect to all adjustments showing the reconciliation of prior years' data.

26. In response to this direction, ATCO Gas reconciled the 2015 and 2016 data used in this application with the 2015 and 2016 data used in its last Rider D application (ATCO Gas 2017-2018 Rider D application).<sup>26</sup> ATCO Gas also provided the following explanation of the seasonal differences in UFG:

12. ATCO Gas has over 1.2 million delivery points of which the vast majority are read on monthly cycles. Cycle billing is the most efficient method for billing large numbers of customers. The DFSS [Daily Forecasting and Settlement System] allocates monthly meter readings to daily flow using daily average temperature as well as other factors such as season and day of week. As a result, the calendarized monthly deliveries reported are calculated estimates and affect the accuracy of UFG on a month to month basis in the shoulder and summer months. ATCO Gas maintains that the accuracy of UFG is more

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<sup>21</sup> Exhibit 23838-X0013, AG reply argument, paragraph 9.

<sup>22</sup> Exhibit 23838-X0013, AG reply argument, paragraph 14.

<sup>23</sup> Decision 22889-D01-2017, paragraphs 30-31.

<sup>24</sup> Decision 21905-D01-2016: ATCO Gas and Pipelines Ltd., 2016-2017 Unaccounted-For Gas Rider D, Proceeding 21905, October 17, 2016.

<sup>25</sup> Decision 2008-105: ATCO Pipelines and ATCO Gas, 2008-2009 Unaccounted for Gas and Fuel Gas Rates – Rider “D” and Load Balancing Deferral Account Rider “F,” Proceeding 96, Application 1583677-1, October 28, 2008.

<sup>26</sup> Exhibit 23838-X0001, application, paragraphs 23-24.

appropriately reviewed over a longer period of, such as a year, to reduce the timing effect of the DFSS estimates.

13. In addition, ATCO Gas designs and builds the distribution system for peak operating conditions. During the shoulder and summer months, the operation of the distribution system needs to be adjusted to ensure accurate measurement during low-flow conditions. The appropriate timing of these adjustments is weather dependent since local temperature fluctuations are unpredictable. For example, there may be a week of unseasonably warm weather early in the spring, but due to the expected return to normal temperatures immediately following, the seasonal operating plan would not be implemented and meters may be under measuring during this period.<sup>27</sup>

27. ATCO Gas also provided details of the aggregated amount of measurement adjustments processed in 2017 of 874 terajoules (TJ). ATCO Gas indicated that in 2017 there were 19 measurement equipment problems, 18 occurrences of reallocation of measurement, three late meter reads, and zero sample point changes identified and corrected. ATCO Gas also processed 15 TJ of post final settlement adjustments in 2017.<sup>28</sup>

28. In response to a Commission IR, ATCO Gas clarified that the 0.33 per cent identified in the application as measurement adjustments for 2017 should have been stated as representing the percentage of total 2017 receipts. Also, the 874 TJ was an absolute number of adjustments made in 2017 comprised of adjustments that were both positive and negative. The net result of these adjustments was a reduction in UFG of 123 TJ or 0.046 per cent of 2017 receipts.<sup>29</sup>

29. In response to the first direction in Decision 22889-D01-2017 referenced above, ATCO Gas also identified the following issues that may cause UFG to increase or decrease, as set out in Table 2:

**Table 2. Sources of UFG**

Source	Issue/concern
Seasonal operating plans	The timing of when the seasonal operating plan can be implemented is [dependent] on the weather. In the shoulder months of spring and fall, temperatures can vary significantly and may affect UFG due to timing of the implementation of the seasonal operating plan.
Equipment failure	Event in which any part of the equipment does not perform according to its operational specifications.
Construction	Mixing of heat areas during construction. Purging and filling of pipelines.
Pipeline leaks	Gas lost to atmosphere.
Hit lines	Gas lost to atmosphere.
Unsolicited use	Gas lost to theft.
Line heater fuel	Gas used during distribution system delivery.

Source: Exhibit 23838-X0001, application, paragraph 17, Table 5.

30. ATCO Gas noted that it continues to take various additional steps to minimize the UFG amount, such as meter sizing procedures, seasonal operating plans, and by collaborating with ATCO Pipelines. This involves implementing procedures to ensure measurement accuracy in the

<sup>27</sup> Exhibit 23838-X0001, application, paragraphs 12-13.

<sup>28</sup> Exhibit 23838-X0001, application, paragraphs 14-16.

<sup>29</sup> Exhibit 23838-X0008, AG-AUC-2018SEP18-005.

expected flow conditions. ATCO Gas has also implemented a program to monitor all regulating stations for low flow conditions, since gas may not be measured accurately at receipt meters if the flow is below the minimum range of the meter. Finally, in conjunction with ATCO Pipelines, ATCO Gas is upgrading measurement equipment, data monitoring, verification of measurement data, seasonal operational adjustments, adjusting sample points and heat areas as necessary.<sup>30</sup>

31. In response to a Commission IR, where the Commission asked ATCO Gas to identify the additional costs incurred to implement the monitoring program and the projected annual costs to ATCO Gas for performing the seasonal operating plan to minimize UFG, and to quantify UFG reductions through the seasonal operating plan, ATCO Gas stated that it does not track the time or costs for the additional steps taken to reduce UFG.<sup>31</sup>

32. In Decision 22889-D01-2017, the Commission provided a new direction to ATCO Gas, as follows:

35. To better monitor the costs associated with the carbon levy, the Commission directs ATCO Gas, in future Rider D applications, to provide a table showing the monthly line heater fuel usage and the associated carbon levy dollars and the difference from the previous year.<sup>32</sup>

33. In response to this direction, ATCO Gas stated that the 2017 carbon levy rate was \$1.011 per gigajoule (GJ) and provided the following table with the carbon levy costs associated with the line heater fuel usage remitted to the Government of Alberta each month.<sup>33</sup>

**Table 3. Line heater fuel and carbon levy**

	Jan-17	Feb-17	Mar-17	Apr-17	May-17	Jun-17	Jul-17	Aug-17	Sep-17	Oct-17	Nov-17	Dec-17	Total
GJ		138,832	59,082	32,616	8,573	2,867	983	1,455	12,167	18,008	41,852	(9,748)	306,687
\$	-	140,359	59,732	32,974	8,667	2,898	993	1,471	12,301	18,206	42,313	(9,855)	310,059

Source: Exhibit 23838-X0001, application, paragraph 26, Table 6.3.

34. ATCO Gas explained that the first month of line heater usage was not reported until February 2017, and the January 2017 costs were consequently payable in February 2017. Further, ATCO Gas stated that it has changed the methodology for calculating the load factor used for line heaters. This resulted in changes to consumption totals from January to October and a carbon levy credit in December of 2017.<sup>34</sup>

35. In response to a Commission IR, ATCO Gas explained that it uses estimated line heater gas usage to determine the carbon levy amount remitted. In 2017, ATCO Gas worked with other distribution companies to compare its estimated gas usage to their actual gas usage for similar line heaters and found that the methodology was estimating higher gas usage. ATCO Gas determined that the original load factor used to estimate line heater gas usage did not account for

<sup>30</sup> Exhibit 23838-X0001, application, paragraphs 18-21.

<sup>31</sup> Exhibit 23838-X0008, AG-AUC-2018SEP18-004.

<sup>32</sup> Decision 22889-D01-2017, paragraph 35.

<sup>33</sup> Exhibit 23838-X0001, application, paragraph 26, and Table 6.3.

<sup>34</sup> Exhibit 23838-X0001, application, paragraph 27.

the effects of ambient air temperature that affects the load factor because the line heater requires less fuel when ambient temperatures are higher.<sup>35</sup>

## 5 Commission findings

36. The Commission finds that ATCO Gas's calculation of Rider D is consistent with the methodology approved in previous decisions, and in particular with Decision 22889-D01-2017. Rider D is approved at 0.766 per cent, effective November 1, 2018. The Rider D schedule is also approved, and is attached as [Appendix 3](#) to this decision.

37. In approving ATCO Gas's application, the Commission took into account the fact that the UFG percentage declined from the 2017-2018 Rider D of 0.888 per cent, and that the applied-for Rider D of 0.766 per cent is below the historical range of the combined UFG rate (0.954 to 1.220 per cent). The Commission is therefore satisfied that ATCO Gas's proposed Rider D for UFG is reasonable.

38. The Commission recognizes that all gas distribution pipeline systems have UFG as an element of operating a natural gas distribution system and that because of the numerous factors that impact UFG, the UFG percentage will fluctuate over time.

39. The Commission finds that ATCO Gas has complied with the directions of the Commission in Decision 22889-D01-2017. Specifically, in its application, ATCO Gas explained various measurement adjustments, the seasonal differences in UFG, the reason for changes in UFG, and its efforts to implement operational changes and metering related to UFG, provided a table showing the monthly line heater fuel usage, the associated carbon levy dollars and the difference from the previous year.

40. With respect to the proposal by ATCO Gas to implement a  $\pm 0.25$  per cent tolerance band, the Commission remains of the view that, due to the unpredictable nature of UFG and the need to control UFG through a rigorous monitoring and mitigation program, it is important for ATCO Gas to continue to track its system's UFG, explain any increase in UFG and take steps to reduce its impact.

41. While there may be some merit in the general proposition that the implementation of a mechanism to reduce the number of regulatory filings related to UFG could ultimately result in greater regulatory efficiency, the Commission is not satisfied that the rigour behind the analysis conducted by ATCO Gas to arrive at a  $\pm 0.25$  per cent tolerance band was sufficient, nor that other potential mechanisms for improving efficiencies to the UFG process were adequately canvassed. In addition, ATCO Gas stated that it had not canvassed retailers or customers with respect to the proposed UFG methodology.<sup>36</sup> While the Commission agrees with the CCA that the drivers of the downward trend in UFG between 2013 and 2017 are not fully understood,<sup>37</sup> the Commission observes that the regulatory requirements to measure, control, mitigate and explain changes in UFG and to seek the annual approval for an updated Rider D rate have coincided with this downward trend.

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<sup>35</sup> Exhibit 23838-X0008, AG-AUC-2018SEP18-006.

<sup>36</sup> Exhibit 23838-X0008, AG-AUC-2018SEP18-003.

<sup>37</sup> Exhibit 23838-X0012, CCA argument, paragraph 7.

42. The Commission also agrees with the CCA's submission that the ATCO Gas system is undergoing significant infrastructure changes, such as the UPR project, and other projects, that are likely to affect UFG. In light of these ongoing system changes, the UFG in the ATCO Gas system may fluctuate, further supporting the need for continued measurement, monitoring, mitigation and reporting in accordance with all Commission requirements and directions during this period.

43. The Commission acknowledges ATCO Gas's explanation that the tolerance band approach is unlikely to result in a large over- or under-recovery of UFG as variances between the UFG experienced on the system and Rider D volumes provided by retailers are accrued to the LBDA. However, in the Commission's view, the need to maintain downward pressure on UFG outweighs any potential efficiency gains associated with the implementation of a mechanism to reduce the already minimal regulatory burden of Rider D filings.

44. For these reasons, the Commission denies ATCO Gas's request for future Rider D rates to remain in place on a continuous basis if UFG calculations are within  $\pm 0.25$  per cent of the currently approved Rider D rate.

45. Accordingly and consistent with Decision 22889-D01-2017, the Commission directs ATCO Gas to continue to provide the following in future Rider D applications on an annual basis:

- Clear explanations of seasonal UFG differences, measurement corrections and reasons for UFG increases or decreases; and
- Information on practices and procedures it has employed to reduce UFG.

46. The Commission also directs ATCO Gas to continue to provide details with respect to all measurement adjustments showing the reconciliation of prior years' data in accordance with the direction found at page 7 of Decision 2008-105.

47. To better monitor the costs associated with the carbon levy, the Commission directs ATCO Gas, in future Rider D applications, to continue to provide a table showing the monthly line heater fuel usage and the associated carbon levy dollars and the difference from the previous year.

48. In addition to reporting the measurement adjustments, the Commission further directs ATCO Gas to state the net results of the above adjustments to UFG, expressed both in terms of energy and as a percentage of receipts.

**6 Order**

49. It is hereby ordered that:

- (1) ATCO Gas and Pipelines Ltd.'s unaccounted-for gas rate rider, Rider D, is approved as filed, effective November 1, 2018, as set out in Appendix 3 to this decision.
- (2) ATCO Gas and Pipelines Ltd.'s request for future Rider D rates to remain in place on a continuous basis if UFG calculations are within  $\pm 0.25$  per cent of the currently approved Rider D rate, is denied.

Dated on October 25, 2018.

**Alberta Utilities Commission**

*(original signed by)*

Kristi Sebalj  
Commission Member

**Appendix 1 – Proceeding participants**

<b>Name of organization (abbreviation) Company name of counsel or representative</b>
ATCO Gas and Pipelines Ltd. (ATCO Gas or AG)
Consumers' Coalition of Alberta (CCA)

Alberta Utilities Commission
Commission panel K. Sebalj, Commission Member
Commission staff S. Sajnovics (Commission counsel) E. Deryabina G. MacIntyre

## 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. Accordingly and consistent with Decision 22889-D01-2017, the Commission directs ATCO Gas to continue to provide the following in future Rider D applications on an annual basis:
  - Clear explanations of seasonal UFG differences, measurement corrections and reasons for UFG increases or decreases; and
  - Information on practices and procedures it has employed to reduce UFG.  
..... Paragraph 45
2. The Commission directs ATCO Gas to continue with the direction found at page 7 of Decision 2008-105 and provide details with respect to all adjustments showing the reconciliation of prior years' data. .... Paragraph 46
3. To better monitor the costs associated with the carbon levy, the Commission directs ATCO Gas, in future Rider D applications, to provide a table showing the monthly line heater fuel usage and the associated carbon levy dollars and the difference from the previous year. .... Paragraph 47
4. The Commission directs ATCO Gas, in addition to reporting the measurement adjustments, to also state the net results of these adjustments to UFG, expressed both in terms of energy and as a percentage of receipts. .... Paragraph 48



## Appendix 3 – Rate Rider D

[\(return to text\)](#)

Effective November 1, 2018, by Decision 23838-D01-2018  
This Replaces Rider “D” Previously Effective November 1, 2017

### **ATCO GAS AND PIPELINES LTD. ATCO GAS**

#### **RIDER “D” TO DISTRIBUTION ACCESS SERVICE CUSTOMERS FOR THE RECOVERY OF UNACCOUNTED-FOR GAS (UFG)**

All Retailer and Default Supply Provider Customers utilizing Distribution Access Service for delivering gas off the ATCO Gas distribution system will be assessed a distribution UFG charge of 0.766% at the Point of Delivery. The UFG assessment will be made up “In-Kind” from each Customer Account.