

# **ALBERTA ENERGY AND UTILITIES BOARD**

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**Calgary, Alberta**

**ATCO GAS – NORTH, A DIVISION OF ATCO GAS  
AND PIPELINES LTD.  
DISTRIBUTION OF PROCEEDS FROM SALE OF  
PRODUCING PROPERTIES**

**Decision 2002-018  
Application No. 1251322  
File No. 6405-14-2**

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## **1 INTRODUCTION**

By letter dated December 12, 2001, ATCO Gas - North (AGN), a division of ATCO Gas and Pipelines Ltd., filed an application (the Application) with the Alberta Energy and Utilities Board (the Board) for approval of a proposal to distribute the customers' share of the proceeds from the sale of petroleum and natural gas rights and production and gathering equipment in the Viking Kinsella field (the Viking assets) to customers of record on specified dates. AGN also requested approval of an interim rate reduction of 11.4¢/gigajoule (GJ) for delivery service rates, effective January 1, 2002. AGN provided documentation with the Application to show that the North Core Customer group (the NCC) supported its proposals. The NCC is a group composed of interveners that represent the majority of AGN's customers, including residential, industrial and institutional consumers, aboriginal communities and a number of municipalities. The NCC has also normally participated in previous proceedings that have dealt with AGN's utility rates and other matters subject to the Board's jurisdiction. (refer to Appendix 1)

On or about January 3, 2002, the Board published Notice of the Application in the daily newspapers having a general circulation in AGN's service areas, and in the weekly newspaper in the Lloydminster area. The Notice was also served on interested parties that were registered in the previous proceedings held by the Board that dealt with AGN's applications for approval to dispose of certain petroleum and natural gas assets, and which led to Decision 2001-46 dated May 29, 2001, and Decision 2001-65 dated July 31, 2001. The Notice invited any member of the public who wished to obtain information about the Application to submit information requests to AGN and the NCC by January 9, 2002. The Notice also provided for objections to the Application to be filed with the Board on or before January 21, 2002. In dealing with the Application, the Board submitted information requests to AGN and the NCC to obtain more details and explanations concerning their respective positions, including information with respect to customers represented by the NCC, the distribution method proposed, alternative distribution methods considered, intergenerational equity issues, and details of the funds to be distributed.

Pursuant to publication of the Notice of the Application, the Board received several letters and telephone calls from individual consumers who expressed concern about a perceived unfairness caused as a result of certain criteria that AGN proposed to use to allocate and distribute the proceeds to its customers. Some also voiced concern with respect to the appropriateness of individual lump sum payments rather than a series of payments over time. To obtain greater clarification of the position of AGN and the NCC with respect to alleged inequities and methods

of dispute resolution for concerned customers, the Board submitted follow-up information requests on January 23, 2002 to AGN and the NCC.

Given that the NCC consented to AGN's proposal for a delivery rate adjustment and that timing was considered to be of the essence in regard to that portion of the Application, the Board considered that it should deal with that portion in an expeditious manner. Consequently, the Board approved, on an interim basis, AGN's request for a delivery rate decrease of 11.4¢/GJ, effective January 1, 2002, in Order U2001-501, dated December 19, 2001.

## 2 APPLICATION

In addition to the proceeds from the sale of the Viking assets, and in accordance with the Joint Recommendation and Collateral Commitments (refer to Section 3 of this Decision), AGN also proposed that the distribution to customers include a recovery of deferred income taxes related to the sales of its producing assets in the Westlock and Lloydminster fields, and negative salvage, which represented the costs recovered from customers for future abandonment of such assets. AGN submitted a proposed method of distributing the customers' share of the proceeds by providing a table that set out the amount and impact by rate group by identifying the annual consumption expected to be utilized in the proceeds distribution and the resulting rate expected to be used to distribute the proceeds to each customer. The final consumption figures were provided by AGN in a letter dated January 22, 2002 (refer to Table 1). In the same letter AGN reduced the aggregate proceeds to be distributed by \$23,000, from \$406,296,000 to \$406,273,000, to adjust for a decrease in interest accrued on the proceeds of approximately \$12,000 and leave to appeal costs of the NCC of approximately \$11,000 (refer to Table 2).

AGN proposed that the proceeds would be distributed to each customer during the month of February 2002 by a lump sum payment, net of amounts owing to AGN for current and overdue charges. The amount distributed would not include municipal franchise fees and GST. AGN stated that it had requested a ruling from the Canada Customs and Revenue Agency (CCRA) regarding the inclusion of GST in the proceeds disbursement but that it did not anticipate a response prior to February 2002. If the CCRA provided a favourable ruling, the amount of GST applicable to the sale proceeds would be subject to a further distribution to customers, and that payout would be distributed in the same proportion to the respective rate classes as applied in the initial distribution.

AGN proposed to hold back \$1 million of the proceeds to ensure funding was available for customers claiming to be disadvantaged by the process established for distribution of the proceeds. Any funds remaining at the end of 2002 would be applied to AGN's Deferred Gas Account (DGA), which is used to reconcile its gas cost recovery rate (GCRR).

**Table 1**  
**Distribution of Proceeds by Rate Group**

<u>Rate</u>	<u>Consumption 2001 (terajoules)</u>	<u>Proceeds by Rate Group (\$000)</u>	<u>Proceeds \$ Per GJ</u>
1 / 11	86,559	288,513	3.333
Holdback		<u>800</u>	
Net proceeds		287,713	3.324
3	17,560	58,530	3.333
Holdback		<u>200</u>	
Net proceeds		58,330	3.322
4	475	1,583	3.333
5	996	3,320	3.333
6	1,615	5,383	3.333
13	6,514	21,712	3.333
Gas Alberta*	4,606	15,353	3.333
U of A	3,006	10,019	3.333
Wainwright	558	1,860	3.333
<b>Total</b>	<u>121,889</u>	<u>405,273</u>	

\*Includes 1.2% growth

**Table 2**  
**Viking Final Proceeds to Customers**

	<u>As Originally Filed (\$000)</u>	<u>As Revised (\$000)</u>
Viking proceeds	385,000	385,000
Interest	696	684
Viking deferred income tax	9,377	9,377
Westlock deferred income tax	1,986	1,986
Lloydminster deferred income tax	237	237
Negative salvage	9,000	9,000
NCC leave to appeal costs		(11)
<b>Total proceeds</b>	<u>406,296</u>	<u>406,273</u>

## 2.1 Rates 1, 11, and 3

AGN proposed that only current active accounts (represented by location of premises) on January 6, 2002 would receive proceeds. Each such customer would receive a prorated share of

the proceeds based on current annual consumption data. New accounts would receive a full year's proportionate share of the respective Rate Classes 1, 11 or 3 proceeds. A rate for distribution of proceeds would be calculated by dividing the total Rate Classes 1, 11 or 3 share of the proceeds by the total annual Rate Classes 1, 11 or 3 consumption, as shown in Table 1, which would then be applied to each customer's current annual consumption data. As previously stated, outstanding amounts owing to AGN and February current charges would be deducted from the customer's prorated share of the proceeds. AGN advised that customers who switched from Rate 3 to Rate 13 during the 2001 calendar year would receive proceeds as Rate 13 customers.

## **2.2 All Other Rate Classes**

AGN proposed that only current active accounts (represented by location of premises) on December 31, 2001, with consumption during the period January 1, 2001 to December 31, 2001, would receive a share of the proceeds. The volume consumed at each premise during the period would be multiplied by the calculated proceeds rate to determine the distribution of proceeds applicable to each active customer. Prior outstanding amounts owing to AGN and February current charges would be deducted from the customer's prorated share of the proceeds.

## **2.3 Gas Alberta Inc.**

AGN proposed that Gas Alberta Inc.'s (Gas Alberta) annual consumption would be increased by 1.2% to accommodate new accounts on the Gas Alberta system, which includes numerous individual accounts. The process requested by Gas Alberta for providing previous refunds from AGN had been to issue a cheque directly to Gas Alberta for the total amount accumulated for all Gas Alberta accounts. Consequently, AGN proposed that a single payment be made to Gas Alberta for its proportionate share of the proceeds to be distributed.

## **3 BACKGROUND**

In Decision 2001-46 and Decision 2001-65 the Board, inter alia, denied the sale of the Viking assets. On September 14, 2001, AGN filed an application for review and variance of these Decisions with respect to the sale of the Viking assets and provided an Amending Agreement with the prospective purchaser that constituted a material change in circumstances, including an increase in the proceeds of sale. Further to that application, in November 2001, AGN and the NCC reached an agreement on the sale of the Viking assets wherein they made a Joint Recommendation that the magnitude of the proceeds to be allocated to the customers be accepted and made Collateral Commitments<sup>1</sup> to be completed, subject to the approval of the sale by the Board. Consequently, in Decision 2001-104, dated December 11, 2001, the Board varied Decisions 2001-46 and 2001-65 and approved the sale of the Viking assets in accordance with the Amending Agreement and the Joint Recommendation of AGN and the NCC.

In the proceedings that led to the aforementioned decisions, interveners consistently held the view that the producing properties concerned were "legacy" assets that were for the long-term benefit of customers. The no-harm threshold was predicated on the notion that the benefits of company owned production (COP) from the properties would be spread over their future useful

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<sup>1</sup> Refer to Decision 2001-104, Appendix 2 and Appendix 3 for complete description

life. Argument was submitted by the NCC that, if the Board would not ultimately approve the sales, the benefit of future COP should have been passed to customers in the form of a credit rider charged against AGN's distribution rates. This method of handling COP was introduced by the NCC in order to recognize its long-term value to a broader range of customers and to assist in removing a barrier that otherwise hindered entry by possible competitors, which did not have COP, to the unregulated natural gas retail market.

#### 4 POSITION OF NCC

With respect to the proposed distribution of proceeds, the NCC stated that it negotiated the terms of the distribution with AGN and that its membership, which represented the interests of every class of core customers on the AGN system, unanimously agreed that the proposed distribution of proceeds was fair and reasonable and was in the best interests of core customers.

The NCC further stated that initially it considered the idea of investing the money in an actively traded bond fund that would generate monthly benefits to be paid to customers in a method similar to that of the COP Credit Rider. Although spreading the payment over a time period would be advantageous to customers who favoured that method of reimbursement, and to those new customers coming onto AGN's distribution system after January 6, 2002 who would receive a share of the proceeds, the NCC rejected the idea of spreading the payment over time.

The NCC outlined the following disadvantages of investing the money and paying it out to consumers over time:

- the return on such an investment (perhaps 5% or less) would be significantly lower than the discount rate of 8% used in the no-harm calculation, thus eroding the no-harm amount over time;
- administrative costs, inflation and taxes would further decrease return on investment and further erode the no-harm amount over time;
- it would be difficult to invest principal of this size (\$405 million) and there would be investing restrictions involved in having to cash out portions of the investment every month rather than being able to allow the full principal to mature;
- the NCC represents many different types of customers and could not possibly assess the financial motives of each. The NCC stated it would be presumptuous for it to think it knows what best to do with customers' money. A customer, for example, may hold high-interest debt, the retiring of which would constitute a greater financial return than that which the customer would achieve through conservative investments currently available. The NCC believed that the payment of cash in a lump sum form comes closest to allowing each customer to pursue his or her own financial goals; and
- it would be more difficult for customers to understand than a lump sum payment.

The NCC also stated that:

It has never been the position of the NCC that financial instruments should be used to provide customers the benefit of a legacy asset. There is a fundamental difference between ongoing benefits derived from COP and ongoing benefits derived from financial instruments. COP provides long-term protection against price volatility, while a financial instrument would not likely provide similar protection.<sup>2</sup>

In respect of customer dispute resolution, the NCC also stated that customers would have to submit their claim in writing before it would be reviewed. In circumstances where a second opinion was necessary or a consumer believed that the rules had not been fairly applied, the NCC was prepared to review and address the request and make a recommendation to AGN.

The NCC agreed with AGN regarding the following criteria and process for adjudication of claims from disadvantaged customers:

- (1) Any existing premise that is billed in the month of February 2002 and did not receive a proceeds payment will be eligible for a proceeds payment.
- (2) Any new premise that is billed prior to March 31, 2002 will be eligible for a proceeds payment.
- (3) Customers will only be entitled to one proceeds payment (unless they have multiple accounts).
- (4) For the situations discussed above, customers could telephone or write AGN to explain their situations. Any other unique situation should be explained in writing to AGN.

## 5 MEMBERS OF THE PUBLIC

Pursuant to the Notice, the Board received correspondence from 24 individual members of the public, of which 14 registered objections to the Application. Of the 14 objections received by the Board, seven were opposed to the methodology used to distribute the proceeds among consumers. Suggestions for alternative methods of allocation included distributing proceeds to all customers within the past year, distributing proceeds on the basis of years of service, distributing the proceeds equally among all customers, and distributing the proceeds to the needy.

Four of the individuals who objected claimed that the lump sum payment method of distribution proposed by AGN was unfair and would provide a windfall for vendors or homebuilders of properties that were sold immediately following the record date to be used by AGN to determine

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<sup>2</sup>BR-NCC.2 Information Response

eligible customers. The remaining three objections suggested that future customers who do not receive the payout would be harmed.

Of the remaining 10 submissions where an objection was not registered, eight questioned whether or not they would be eligible for the payout, and two supported the proposed Application as filed.

## **6 VIEWS OF THE BOARD**

The Board is concerned by comments made in the media that appear to have generated speculation among the public regarding the distribution of customer proceeds even before the Board approved the sale in Decision 2001-104. In particular, the Board is concerned that recent comments made by the City of Edmonton through the media and by AGN in its billing supplements may have been construed by the public to mean that the Board's approval of AGN's proposal for distribution of proceeds was a foregone conclusion. The Board does not consider its authority or objectivity to have been compromised by the media coverage. However, the Board cautions all parties in making statements to the media in relation to an active application before the Board so as not to interfere with the fair consideration of the application by the Board in accordance with its statutory jurisdiction.

The Board recognizes the broad range of support given to the distribution proposal, and the unanimous agreement by the members of the NCC that the proposed distribution is fair, reasonable, and in the best interests of core customers. In further discussion of the specific details surrounding the Application the Board accepts that the NCC supports the Application as filed. However, the Board is cognizant of its role in determining whether or not the public interest has been met and served by AGN's Application to distribute the proceeds. The Board notes the objections from members of the public opposed to the methodology advocated by AGN to allocate the proceeds to customers. The Board therefore finds it necessary to assess the specific details of the proposal as noted below.

The Board notes that, of the submissions received from the public, the majority highlighted specific cases and situations where an individual was disadvantaged by the date set for being a customer of record. The Board acknowledges that the proposal includes steps to be taken to compensate for inequities that could arise, by holding back a portion of the funds allocated to Rate Classes 1, 11 and 3. The Board notes the 14 objections received pursuant to the Notice of Application. The merits of these objections are discussed later in this Decision.

With respect to the payout, the Board considers that two basic options were available for consideration, namely a lump sum payment, or spreading the payment over some period of time. The Board notes that the NCC rejected the option of spreading payment over a period of time in favour of a lump sum payment. While the NCC viewed the "legacy aspect" of COP as being a hedge against future gas costs, it considered that when COP was sold the hedge could not be easily or cost effectively replaced.

The Board notes AGN's comments that the various distribution strategies discussed during the hearing, including the establishment of a trust fund to pay out the proceeds over time, were for illustrative purposes and that customers would determine how best their share of the proceeds should be distributed. Given the broad representation of the NCC, AGN considered that the recommended method for distribution was appropriate.

With respect to proposals made by individual members of the public to distribute the proceeds to customers within the past year or on the basis of years of service, the Board considers that the additional information required to successfully implement such proposals would not only be difficult to obtain but also difficult to verify. In addition, such measures would create an unwarranted expense to administer and execute. More importantly, these methodologies would not be in keeping with the true purpose of the payout, which was intended to save customers harmless in the future. Therefore, the Board rejects the proposals to distribute the proceeds to customers within the past year or on the basis of years of service.

The Board has also considered objections to AGN's proposal submitted by members of the public, who were real estate professionals, who were concerned about the eligibility date with respect to certain commercial transactions. The Board considers that future owners of large rental properties would have the option of appealing to AGN for relief via the proposed holdback of funds.

The Board also notes the proposal to distribute the proceeds to the needy. Based on the *Gas Utilities Act*, the question of whether customers may be needy is not a criterion the Board can consider in this context.

The Board notes the submissions that the proceeds should be distributed equally among all customers. The no-harm standard calculated in Decisions 2001-46 and 2001-65 was a discounted value of future benefits that consumers might have received if the Viking assets had remained in utility service. Given that Decision 2001-104 approved a Joint Recommendation from AGN and the NCC respecting the sale of the Viking assets, the Board considers that the customer portion of sale proceeds is in effect a proxy of future benefits that customers would receive. The Board considers that distributing the proceeds among customers on an equal basis would discredit the notion of the no-harm standard established by the Board. In an equal distribution, low use customers would receive a larger portion of the funds and large use customers would receive a smaller portion of the funds available as compared to an allocation based on consumption. Thus, low use customers would be overcompensated for future gas costs; similarly, large customers would be under-compensated for future gas costs. The Board therefore concludes that distributing the proceeds equally among customers, regardless of level of consumption, would not be fair or reasonable.

The Board notes that the methodology for the distribution of proceeds as presented by AGN is based on consumption. The Board agrees with AGN that basing the distribution on the past year's consumption is the most appropriate methodology to be used in determining customers portion of the payout. The Board therefore approves the methodology proposed by AGN to allocate the proceeds to customers based on 2001 annual consumption.



The Board also considers reasonable the proposal by AGN to distribute the proceeds in a lump sum to customers of record on a specific fixed date. The Board recognizes that some former and future customers may be disadvantaged as a result of a fixed date being used to determine customers of record. However, the Board also considers that no matter what criteria is used to determine eligibility, some customers could be disadvantaged. Additionally, the Board notes that AGN proposed to deduct from the customer's prorated share of the proceeds the prior outstanding amounts owing to AGN and current month charges. The Board also considers this to be reasonable.

The Board has reviewed the criteria for dealing with customers claiming to be disadvantaged by the eligibility dates. The Board considers that AGN's criteria to compensate disadvantaged customers could be used to determine eligibility of all consumers. However, the Board considers that using dates other than December 31, 2001 and January 6, 2002 could be selected without creating any undue administrative problems. A more current date used to determine eligibility would be more consistent with the notion that the payout is intended to hold future customers harmless from the sale of the Viking assets.

The Board therefore directs AGN to determine customers of record (active accounts or premises) on all rates as of March 2, 2002. All consumers who are customers of record as of this date will receive a payment of the proceeds. The Board expects that using a date that is more aligned with the issuing of this Decision will provide the fairest result and will minimize the number of customers claiming to be disadvantaged.

The Board notes that as part of the proposal, AGN included a holdback of \$1 million to ensure funds are available for consumers from Rate Classes 1, 11 and 3 claiming to be disadvantaged by the proposed distribution method. The Board also notes that AGN will treat Rate 3 customers who have switched to Rate 13 as if they were Rate 13 throughout 2001.

The Board recognizes that both AGN and the NCC have agreed to the amount of funds in the holdback, as well as the process and criteria to be used in dispensing these funds. The Board is satisfied that AGN has the experience to select a holdback amount that will be adequate to pay out any disadvantaged customers. However, the Board considers that selecting only Rate Classes 1, 11 and 3 to fund the holdback produces a lower unit rate per gigajoule for those customers and is therefore discriminatory and unfair. The Board concludes that if it were not for the proposal to set aside a holdback, all customers would be receiving the same unit rate. Also, those customers who are judged to be disadvantaged, and therefore are legitimate recipients of a payment, should receive an undiminished amount. Accordingly, all customers should fund the holdback amount. Therefore all customers would receive the same amount, which is \$3.325/GJ ( $\$405,272,000 / 121,889,000$  GJs).

The Board recognizes that there could be many individuals claiming to be disadvantaged due to a wide variety of circumstances. The Board has reviewed the guidelines suggested by AGN that will be used in determining eligibility for a payment from the holdback funds. Given the direction to use the date previously stipulated by the Board, the recommended criteria and process should be adjusted as follows:

- (1) Any existing premise that is billed in the month of March 2002 and did not receive a proceeds payment will be eligible for proceeds payment.
- (2) Any new premise that is billed prior to April 30, 2002 will be eligible for a proceeds payment.
- (3) Customers will only be entitled to one proceeds payment (unless they have multiple accounts).
- (4) For the situations discussed above, customers can telephone or write AGN to explain their situations. Any other unique situation should be explained in writing to AGN.

The Board is satisfied that AGN, in conjunction with the NCC, will be able to successfully apply the foregoing criteria to resolve any claims that may arise.

The Board also notes AGN's proposal to charge the remaining balance (positive or negative) of the \$1 million in holdback funds to the DGA at the end of 2002. The DGA is the account used to reconcile AGN's gas costs with its GCRR, i.e., its gas sales. As COP was a source of gas, it would appear reasonable that any holdback excess or deficiency could be applied to the DGA in terms of expediency and notwithstanding that Rate 11 or Rate 13 customers could be eligible in certain circumstances for such funds. The Board also considered whether using a rate rider to deal with the remaining holdback would be appropriate. However, given that the amount remaining should be less than the \$1 million set aside, after customer grievances would have been addressed, the use of a rate rider on the distribution rates for such an amount would seem to be unwarranted.

The Board considers that if there were a deficiency in the amount of holdback funds, the resulting charges to the DGA and subsequent impact on the GCRR would be negligible. New DGA procedures are set to commence April 2002, and the remaining holdback amount should be considerably less than \$1 million. Therefore, using the DGA would be practical and expedient, and should have little effect on the GCRR and thus AGN's sales customers. Accordingly, the Board approves the use of the DGA to capture any excesses or deficiencies in the holdback funds.

The payout of the customer portion is intended to compensate consumers for future gas costs as a result of the Viking sale. This caused some individuals to question the appropriateness of a one-time payout. The Board therefore considers that consumers should carefully weigh their individual options when assessing how they will use the payout. Consumers could invest in energy saving measures to reduce future gas consumption or invest the funds to offset future gas costs.

**7 BOARD ORDER**

Having regard to the evidence and submissions, and having regard to its own knowledge and findings in this Decision, the Board hereby orders that in respect of the proceeds from the sale of producing properties by ATCO Gas – North, a division of ATCO Gas and Pipelines Ltd.:

1. On or before March 31, 2002, a unit rate payment of \$3.325/GJ shall be applied to each active customer account of record on March 2, 2002 in all Rate Classes, based on annual consumption data for each account during 2001, aggregating approximately 121,889 terajoules.
2. A holdback in the amount of \$1 million shall be retained from the aggregate proceeds to provide funding for those customers determined to be disadvantaged by the process established for the distribution of the proceeds, using a unit rate of \$3.325/GJ for payment.
3. Any excess or deficiency of holdback payments to disadvantaged customers at December 31, 2002 shall be applied to ATCO Gas – North's Deferred Gas Account.
4. If ATCO Gas – North receives a favourable ruling from the CCRA with respect to the inclusion of GST in the proceeds disbursement, the GST amount should be distributed in the same proportion as approved by the Board in this Decision.
5. ATCO Gas – North shall file with the Board, by April 30, 2002, a reconciliation of the amounts distributed to customers, net of holdback amounts.
6. ATCO Gas – North shall file with the Board, by January 15, 2003, a summary of holdback payments made to disadvantaged customers and a summary of the GST amounts, if any.

Dated in Calgary, Alberta on February 21, 2002.

**ALBERTA ENERGY AND UTILITIES BOARD**

*<original signed by>*

B. T. McManus, Q.C.  
Presiding Member

*<original signed by>*

T. M. McGee  
Member

*<original signed by>*

J. I. Douglas, FCA  
Member

**Appendix 1**

**Members of the North Core Customer Group**

<b>Representative Body</b>	<b>Represented Parties</b>
Aboriginal Communities and Saddle Lake First Nation	Treaty 8 Aboriginals
Canadian Forest Products Limited, Vanderwall Contractors (1971) Ltd., Spruceland Millworks Inc., and Zavisha Saw Mills Ltd.	
City of Edmonton	
Consumers Coalition of Alberta	The Consumers' Association of Canada (Alberta) The Alberta Council on Aging
Federation of Alberta Gas Co-ops and Gas Alberta Inc.	
Public Institutional Consumers Association	Provincial Health Authorities of Alberta Alberta School Boards Association Council of Presidents Public Colleges and Technical Institutes
University of Alberta	

**Distribution of Proceeds from Sale of Producing Properties**

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Municipal Intervenors

City of Camrose  
City of Cold Lake  
Town of Drayton Valley  
Town of Edson  
Town of Fairview  
City of Fort Saskatchewan  
Town of Fox Creek  
Town of Gibbons  
Town of Grande Prairie  
Town of Hinton  
Town of Lacombe  
City of Lloydminster  
Town of Peace River  
Town of Ponoka  
City of Red Deer  
Town of Rocky Mountain House  
City of St. Albert  
City of Spruce Grove  
Town of Stony Plain  
Town of Vegreville  
Town of Vermillion  
Town of Westlock  
City of Wetaskiwin  
Town of Whitecourt  
Regional Municipality of Wood  
Buffalo