From: <u>Jennifer Coleman</u>

To: MSA Stakeholder Consultation
Cc: Linda Chan; Nancy McKenzie

Subject: Notice re Publication of Retail Market Statistics - Feedback Requested

Date: Friday, June 24, 2016 5:31:15 PM

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Good afternoon,

As per the MSA bulletin of June 8, 2016, please find AltaGas Utilities Inc.'s (AUI) comments on the proposed changes to the published Retail Market Statistics below.

MSA Proposal

1. Time step for the data is proposed to be monthly.

AUI has no issues with a this time step and will continue to provide its switching statistics in a monthly format.

2. The degree of precision of the data to be posted. Graphical presentation or a rounding convention would be ways of limiting the precision of the data.

AUI will continue providing its retail switching statistics in the current agreed upon format. If the MSA chooses to round or change the precision of the published numerical data, AUI will take no responsibility for errors or omissions in the modified data.

3. The delay before posting the data; three months is suggested.

From AUI's perspective a three month delay prior to posting is sufficient. However, it should be noted a three month delay will not protect the commercial interests of large industrial customers if sites and consumption are not aggregated.

4. The minimum threshold in size of firms below which they are not named but aggregated into a single group; the MSA has used 5% in the past.

AUI submits all retailers with less than 10% of total retail **sites** be aggregated into an 'other' category.

The aggregation must be based on site numbers not consumption as consumption can change significantly month over month and may allow for the identification of individual customers. Market share fluctuations will not be as significant if a site percentage is used for aggregation as the number of sites does not vary to the same extent as consumption. Also, to prevent identification of certain customers,

all published data must be aggregated with no splits between customer rate classes.

5. Whether all consumer classes need to be included for all these reports.

As currently being provided, all customer classes should be included in the reports on the condition data identifying any single customer is not published.

6. Combining various small electricity zones into one labelled 'Other'. This comprises Cardston, Crowsnest Pass, Fort Macleod, Lethbridge, Ponoka and Red Deer.

Not applicable to AUI.

If you have any questions or concerns in regards to the above statements please contact me.

Thank you,

Jennifer Coleman Senior Regulatory Specialist AltaGas Utilities Inc.

780-980-7302 jcoleman@agutl.com