

**Rocky Rural Electrification  
Association Limited  
And  
Rocky Rural *Power* Division  
Code of Conduct AR 160/2003  
Compliance Plan  
Version 8.0**

**ROCKY R. E. A.**



**Your Member Owned Rural Electrification Service**

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**ROCKY RURAL ELECTRIFICATION ASSOCIATION LIMITED  
AND  
ROCKY RURAL POWER DIVISION  
CODE OF CONDUCT AR 160/2003  
COMPLIANCE PLAN VERSION 8.0**

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## PART 1

### Introduction

1 In order to provide members with additional retail choice and promote fair retail competition in the Alberta Electric Industry, (hereafter referred to as the "Industry"), ROCKY RURAL ELECTRIFICATION ASSOCIATION LIMITED (hereafter referred to as the "Owner") has formalized an affiliated retail division, Rocky Rural Power Division (hereafter referred to as "Rocky-Power"). The customer of the Owner must be member of the Association to receive Distribution Service therefore the term customer as including a member of the Owner.

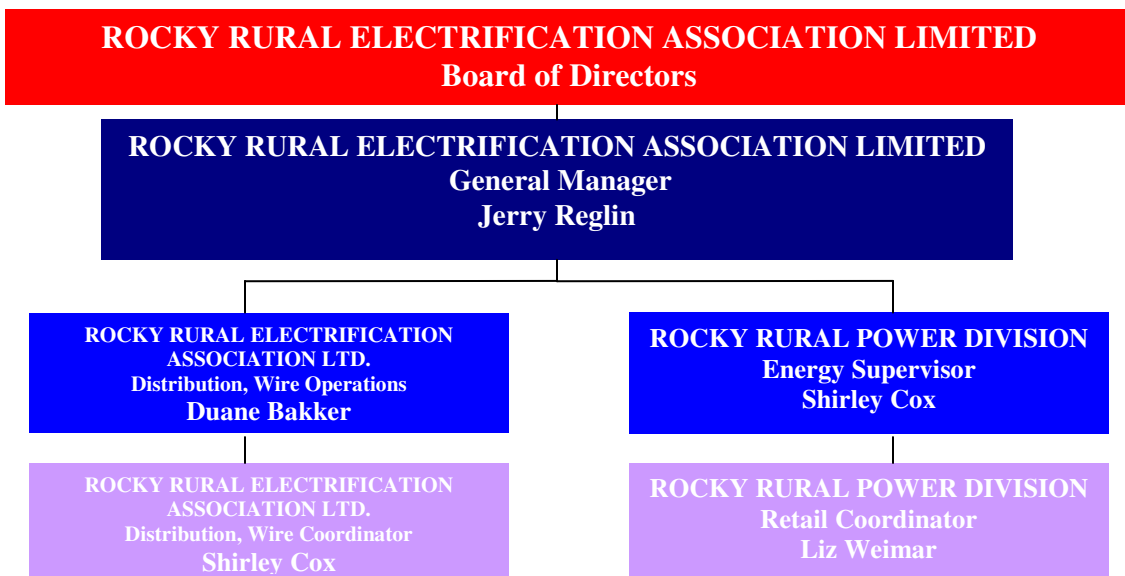
The Owner will continue to provide wires related services on behalf of the members and in all cases a customer must be a member of the Owner to receive Distribution Service. For the purpose of this compliance plan therefore, the term "customer" means and includes a member of the Owner.

The Owner has developed a compliance plan in partnership with Rocky-Power that it will implement internally to conduct daily business in a compliant manner. This compliance plan identifies procedures and mechanisms that the directors, officers, employees, agents and contractors of the Owner and Rocky-Power will utilize to comply with the *Code of Conduct Regulation AR 160/2003* (hereafter referred to as the "Code"), while continuing to provide safe, reliable service to its members. Upon approval of this amended joint compliance plan, by the Market Surveillance Administrator (hereafter referred to as "MSA"), this compliance plan is in effect.

Except where otherwise expressly noted, terms used in this compliance plan have the same meaning as defined in the Code or the, Alberta Electric Utilities Act (hereafter referred to as the "Act"), as applicable.

### Organizational Structure and Accountability

2 To ensure adherence to the Code and legislative requirements the Owner and Rocky-Power will implement procedures and processes identified in this compliance plan under the following organizational structure:



Notwithstanding that Rocky-Power is part of the Owner, from a Code perspective it will be treated as distinct to the extent of the functions carried out by Rocky-Power.

Thus, in accordance with the Act and related regulations, to the extent that the Owner is carrying out retailer functions through its Rocky Power Division, Rocky-Power will be treated as a regulated rate provider and affiliated retailer of the Owner, for the purposes of the application and interpretation of relevant Code provisions.

To the extent that this compliance plan makes reference to directors, officers, employees, contractors and agents of Rocky-Power, it is understood that those persons will fulfill the same role(s) on behalf of the Owner.

Insofar as agreements entered into by Rocky-Power, including (without limitation) agreements with members for the provision of retail electricity services, Rocky-Power will be described as a division of the Owner.

Services provided by the Owner include, but are not limited to:

- Meter Data Management (MDM) – demand reads performed by the Owner’s staff.
- Meter Service Provision (MSP)
- New Construction
- Services Identified in the Distribution Access Tariff
- Distribution Maintenance
- New Distribution Construction
- 24 Hour Emergency Response
- Safety and Training

Services provided by Rocky-Power include but are not limited to:

- Regulated Electricity Billing, Regulated Default Supply and Default Supply
- Regulated and Retail Energy Procurement
- Retail Electricity Billing
- Settlement System Code Transaction Processing
- Regulated and Retail payment processing
- Distribution Access Billing
- Member Services
- Meter Data Management (MDM) – Process member meter reads and process meter reads performed by contractor.

Unless otherwise expressly noted, Rocky-Power will provide retail electricity services only in the service area and to members of the Owner.

Pursuant to Section 31(2)(d) of the Code the following individual will be responsible for development, implementation, monitoring and ensuring adherence to this compliance plan and the Code on behalf of the Owner and Rocky-Power:

Jerry Reglin  
General Manager,  
**Rocky Rural Electrification Association Limited**  
(403) 845-4600  
[jreglin@rockyrea.com](mailto:jreglin@rockyrea.com)

To the extent of duties and responsibilities given to the General Manager under this compliance plan, that person will be considered to be acting for and on behalf of the Owner and Rocky-Power.

The General Manager may at their discretion delegate some or all of their responsibilities pursuant to this compliance plan to another person or other persons, and to that extent will document any such delegation in writing and maintain a record of same in accordance with this compliance plan.

The joint Owner and Rocky-Power compliance plan is intended to be approved by the MSA and is a public document.

The following pages present the Owner and Rocky-Power position statements regarding compliance to the Code.

## **PART 2, CONDUCT OF OWNERS AND RETAILERS**

### **DIVISION 1, EQUAL TREATMENT FOR MEMBERS**

The following position statements address the following sections of the Code:

- Part 2, Division 1, 4, Tying Prohibited
- Part 2, Division 1, 5, Transfer of Members
- Part 2, Division 1, 6, Representations
- Part 2, Division 1, 7, Advertising
- Part 2, Division 1, 9, Confidentiality Rule

#### **Tying**

**3** The Owner will not induce customers to acquire goods or services from any other retailer, including Rocky-Power by making or appearing to make regulated electricity services conditional on the acquisition of those goods or services. Potential customers will be informed of customer choice and directed to a place where a list of all licensed retailers can be provided.

#### **Transfer of Members**

##### **4(i) *The Owner Position Statement***

The Owner will not have operational responsibility for transferring a member to a retailer or a retail electricity service tariff, having arranged for Rocky-Power to be responsible for handling enrolment and retail electricity services transactions. Rocky-Power shall have the responsibility of processing the appropriate Settlement System Code (hereafter referred to as "SSC") transaction(s), or any additional agreed upon transaction(s). The Owner therefore relies upon Rocky-Power for compliance with the Code in that regard.

##### **(ii) *Rocky-Power Position Statement***

Rocky-Power will not transfer a member to a retailer or a retail electricity service tariff without receiving the appropriate SSC transaction(s), or any additional agreed upon transaction(s). The retailer, utilizing at a minimum guidelines identified in the *Energy Marketing Regulation* under the *Fair Trading Act*, shall manage obtaining member consent.

All retail electricity services, other than default supply, provided by Rocky-Power will be evidenced by a signed contract that includes a member consent provision.

## Representations

### **5(i) *The Owner Position Statement***

The Owner will not represent that customers of any retailer will receive different treatment from the Owner than customers of Rocky-Power or of other retailers.

### **(ii) *Rocky-Power Position Statement***

Rocky-Power will not represent that customers of any retailer will receive different treatment from the Owner than that of its own members or customers of other retailers. Service levels, inquiries, service order processing and SSC transactions, whenever possible, shall be processed within the guidelines set out in the Owner Member Terms and Conditions and/or Distribution Terms and Conditions and the SSC. Copies of the Owner Terms and Conditions, for either distribution services or member, are available upon request. A current copy of the SSC may be obtained from the Alberta Utilities Commission (AUC) website at [www.auc.ab.ca](http://www.auc.ab.ca).

Any member inquiries regarding retail electricity services will be addressed through written and verbal scripts indicating customer choice and directing the member to a place where a list of all licensed retailers can be obtained. All scripts will be made available to the Auditor upon request.

## Advertising

### **6(i) *The Owner Position Statement***

The Owner shall bear all costs associated with its advertising for wires related services.

### **(ii) *Rocky-Power Position Statement***

Rocky-Power shall bear all costs associated with its advertising for retail electricity services. At no time will available member information be used for sales and marketing purposes, except in accordance with the Code. Rocky-Power reserves the right to utilize its billing envelope for marketing purposes in accordance with section 17(2) of the Code. The Owner will utilize the Rocky-Power billing envelope for delivery purposes.

### **(iii) *Communications***

- a) All directors, officers, employees, agents and contractors of Rocky-Power who are approached by members regarding retail electricity services shall, verbally or with written material, direct that member to a place where they may obtain the list of licensed retailers maintained in accordance with the *Fair Trading Act*, and the regulations under that act. This information will also

be provisioned in any Internet text or written material published or sent that markets retail electricity services.

- b) All directors, officers, employees, agents and contractors of Rocky-Power who are approached by members regarding retail electricity services shall, verbally or with written material, advise the member that provision of regulated electricity services is not incumbent on energy provision by Rocky-Power. This information will also be provisioned in any Internet text or written material published or sent that markets retail electricity services.

### **DIVISION 2, CONFIDENTIALITY OF CUSTOMER INFORMATION**

The following position statements address the following sections of the Code:

- Part 2, Division 2, 9, Confidentiality Rule
- Part 2, Division 2, 10, Disclosure of Customer Information with Consent
- Part 2, Division 2, 11, Disclosure to Two or More Retailers
- Part 2, Division 2, 12, Conditions of Disclosure of Customer Information
- Part 2, Division 2, 13, Historical Electric Energy Consumption
- Part 2, Division 2, 14, Aggregated Customer Information

#### **Confidentiality Rule**

##### **7(i) The Owner Position Statement**

The Owner shall in relation to its operations ensure that all customer information in its possession is protected in accordance with the Code. The Owner will ensure that directors, officers, employees, agents and contractors of the Owner are provided Code training and are subject to signing of a confidentiality agreement sufficient to address their Code related obligations.

##### **(ii) Rocky-Power Position Statement**

Rocky-Power shall in relation to its operations ensure that all member information in its possession is protected in accordance with the Code. Rocky-Power will ensure that directors, officers, employees, agents and contractors of Rocky-Power are provided Code training and are subject to signing of a confidentiality agreement sufficient to address their Code related obligations.

Each person shall sign acknowledgement as to training, awareness of Code and compliance plan, and obligation to comply with Code and compliance plan. Yearly refresher training will also be provided and documented as stated above.

The Owner will ensure any member information request regarding the Member Electric Service Contract is logged and receives signed approval by a person with the

requisite degree of authority prior to release of any related customer information. Internal requests to remove or access customer information from the Owner's secured location will follow this same process. Rocky-Power will ensure any member information request is logged and receives signed approval by a person with the requisite degree of authority prior to release of any related member information. Internal requests to remove or access member information from Rocky-Power's secured location will follow this same process.

Approval will be based on content, purpose and necessity. At a minimum the log shall contain:

- Date of Request
- Name of Individual Requesting Information
- Type of Information Requested
- Purpose
- Approved By
- Projected Return Date (if applicable)
- Actual Return Date (if applicable)

### **Disclosure of Member Information With Consent**

#### **8(i) *The Owner Position Statement***

The Owner will assume the sole responsibility for processing Member Electric Service Contracts and will not release any customer information to any person unless it has obtained from the customer a signed Consent for Customer Information Release form as identified in the Owner's distribution tariff. All other information requests will be processed by Rocky-Power.

#### **(ii) *Rocky-Power Position Statement***

Rocky-Power will not release any member information to any person unless it has obtained from the member a signed Consent for Member Information Release Form as identified in the Owner's distribution tariff. Should that information be to two or more retailers the information will be disclosed to those retailers at the same time and in the same manner.

The Owner and Rocky-Power will process member information without obtaining member consent in accordance with Section 10(3) of the Code.

### **Conditions Of Disclosure Of Member Information**

#### **9(i) *Owner Position Statement***

Rocky-Power shall assume the sole responsibility of processing all disclosure requests on behalf of the Owner with the exception of the Member Electric Service Contract. In accordance with Section 12 of the Code, the Owner will by the way of

written policy and monitoring ensure that tipping will not occur as a result of third party disclosure requests.

**(ii) *Rocky-Power Position Statement***

Rocky-Power, shall in relation to its operations process all disclosure requests within seven business days upon receipt of a member signed Consent for Member Information Release form. Member information that has been released will be logged as identified earlier in this compliance plan and retained for a period of seven years. Member information is considered confidential and no other party, internal or external, will be informed of its release. The Owner will ensure that through Code training and logs, any release of member information is monitored and addressed accordingly.

At a minimum the log of transactions shall contain:

- Date of Transmittal
- Member Name
- Transmittal Method
- Type of Information Sent
- Recipient(s)
- Transmittal Sent By
- Proof of Transmittal
- Internet Site ID

The Owner will ensure that through Code of Conduct training and logs, any release of customer information is monitored and addressed accordingly.

**Historical Electric Energy Consumption**

**10(i) *The Owner Position Statement***

The Owner will not, in relation to operations, be responsible for providing customer information to retailers.

**(ii) *Rocky-Power Position Statement***

Rocky-Power shall assume the sole responsibility of processing all historical electric energy requests on behalf of the Owner to Retailers.

In the event that the Owner receives such a request, it will be routed to Rocky-Power in a timely fashion for processing. The Owner therefore relies upon Rocky-Power for compliance with the Code in that regard. In accordance with Section 12 of the Code,

Rocky-Power will by the way of written policy and monitoring ensure that tipping will not occur as a result of third party disclosure requests. Rocky-Power will process a request for disclosure of historical consumption information within fifteen business days upon receipt of a member signed Consent for Member Information Release form. Rocky-Power will provide, if available, twelve months of historical consumption preceding the date of the request. All consumption data will be provided by screen print of historic billed consumption and will be supplied to the member or retailer by e-mail. Historical consumption information that has been released will be logged as identified earlier in this compliance plan.

**Aggregated Member Information**

**11 *Owner and Rocky-Power Position Statement***

The Owner and Rocky-Power will not provide aggregated member information to any person. Some members in the Owner's service area have signed confidentiality agreements indicating that information of this nature cannot be released. As a result a true representation of aggregated member information is not possible.

**DIVISION 3 EQUAL TREATMENT OF RETAILERS**

The following position statements address the following sections of the Code:

- Part 2, Division 3, 15, Equal Treatment

**Equal Treatment**

**12 *Owner and Rocky-Power Position Statement***

The Owner and Rocky-Power will not seek or obtain preferential treatment from the Owner, without limiting the foregoing, including with regard to the following:

- Operational services
- Costs associated to provision of operational services
- Adherence to service level standards
- Communication of completion and failure notifications
- Phoned in meter readings by retailers and/or their customers
- All other member/retailer interactions that may arise

To ensure equality of retailers is adhered to, all directors, officers, agents, contractors and employees of Rocky-Power will be:

- Provided Code training when this compliance plan has been approved or whenever it has been updated or modified.
- Providing operational training of staff, maintaining the focus here will ensure equal opportunity for retailers.
- Periodically monitored for Code compliance. Monitoring will be accomplished by:
  - Randomly screening service order completion notifications sent to retailers.
  - Results of monitoring and screening shall be provided in the quarterly compliance reports, as applicable.
  - Random monitoring of incoming calls. Currently recorded calls not possible, therefore only staff portion of conversations can be screened and will be screened.

In the event that a concern is discovered, the General Manager will document the concern and document action for resolution. Implementation of the resolution will be documented and signed off by the General Manager and any affected parties. All resolution documentation will be included in both the quarterly and annual compliance reports as applicable.

**DIVISION 4, BUSINESS PRACTICES OF OWNERS AND RETAILERS**

*The following position statements address the following sections of the Code:*

- Part 2, Division 4, 17, Conditions of Access to Written Member Communications

**Conditions of Access to Written Member Communications**

**13     *Owner and Rocky-Power Position Statement***

The Owner and Rocky-Power will at its discretion provide articles in the Owner's monthly newsletter to members and will:

- Send the newsletter in billing envelopes to both regulated electricity, and Rocky-Power retail electricity members. All newsletters will be retained and made available to the Auditor upon request.
- Costs associated with production and distribution of the newsletter are shared pro rata as between the Owner and Rocky-Power, and evidenced and separated in accounting administrative transactions records.

## **PART 3, RELATIONSHIP BETWEEN OWNERS AND THEIR AFFILIATED RETAILERS**

### **DIVISION 1, PREVENTING UNFAIR COMPETITIVE ADVANTAGE**

The following position statements address the following sections of the Code:

- Part 3, Division 1, 19-20 Efficiency Without Unfair Competition
- Part 3, Division 1, 21, Member Information From Employees and Others
- Part 3, Division 1, 22, Joint Acquisitions, Research and Dispositions
- Part 3, Division 1, 23, Goods and Services Transactions To Be At Fair Market Value
- Part 3, Division 1, 24, Financial Transactions

#### **Efficiency Without Unfair Competition**

##### **14(1) *Jointly Shared Corporate Functions, Systems and Applications***

###### ***Owner and Rocky-Power Position Statement***

In order to minimize additional capital cost, the Owner will continue to share with Rocky-Power, corporate functions, systems and applications. Costs for purchases, updates, support and maintenance will be cost shared proportionally by the Owner and Rocky-Power. Associated financial transactions shall clearly demonstrate accurate cost allocation between the two divisions, as evidenced by separate general ledger entries. Operational procedures specific to the compliance plan (reporting), the SSC (transactions, timing), and Code training will ensure that member and/or site attribute information is not used for sales and marketing purposes. System security protocols will be set at a corporate level and maintained corporately by a designated system administrator. This will curtail information access based on system identification. These protocols will be based on user identifications (ID and password). System access logs will be made available to the Auditor upon request through arrangement with the system administrator.

The following are corporate functions, systems and applications that shall be shared by Rocky-Power and the Owner. They include but are not limited to:

- Bellamy **ASP** (Billing System)
  - *System used for calculation of billing statements, processing payments, validation of meter data.*
- DropChute
  - *Software and server used to process inbound and outbound Settlement System Code transactions.*

- Simply Accounting
  - *Application used for payroll and accounting.*
- Telephony
  - *Corporate phone system and hardware and software.*
- Facilities
  - *Rocky-Power and the Owner will share a common corporate location.*
- IT support
  - *Third party vendor used to maintain corporate servers.*
- LAN
  - *Local Area Network.*
- Phone Experts
  - *Building Security and telephone service.*
- Member Service
  - *Member Call Centre, billing, payment processing and general inquiries*

**(2) Confidentiality of Member and Site Information**

***Owner and Rocky-Power Position Statement***

Rocky-Power shall ensure that all directors, officers, agents, contractors and employees of Rocky-Power are provided Code and procedural training regarding confidentiality of member and site information. To maintain member service levels directors, officers, agents, contractors, and employees of Rocky-Power shall ensure all member information is used solely for the purpose of completing daily operational functions, and not for sales and marketing purposes except as permitted under the Code. Any member inquiries regarding retail electricity services will be addressed through written and verbal scripts indicating member choice and directing the member to a place where a list of all licensed retailers can be obtained. All scripts will be made available to the Auditor upon request. Whenever possible all incoming calls will be routed to a central agent. At this time the *call type* will be determined and routed to either Rocky-Power or the Owner's staff. If possible, initial screening shall try to determine if the member is being provided regulated service. This will determine how agents will script the call. In the event this cannot be determined, all agents will script the call as if it were a regulated service member.

In the event that another retailer is available in its service area, no Rocky-Power director, officer, employee, agent or contractor shall indicate to a member what retailers are licensed to provide retail electricity services in the Owner's service area. Calls of this nature will only be routed to the General Manager. In the event that a specific retailer is mentioned, the agent may direct that member to contact that retailer directly.

Member information that has been obtained from previous employment with other industry participants shall be considered confidential and Rocky-Power will not

request this information be disclosed. All existing and new directors, officers, agents, contractors and employees of Rocky-Power shall be provided Code training, with specific reference to Section 21 of the Code. All departing directors, officers, agents, contractors and employees of Rocky-Power shall return any member information, have system access protocols and security privileges removed. This shall be evidenced by an Employee Exit Checklist.

**(3) *Financial Transactions***

**(i) *Owner Position Statement***

The Owner will not provide to Rocky-Power a more favorable, loan, guarantee, security or other financial transaction other than it could obtain on the open market as offered by major chartered financial institutions.

**(ii) *Rocky-Power Position Statement***

Rocky-Power, shall not obtain from the Owner a more favorable, loan, guarantee, security or other financial transaction other than it could obtain on the open market as offered by major chartered financial institutions. All such transactions shall be in writing and monitored in accordance with generally accepted accounting principles. All transactions and records will be available for quarterly and annual compliance reports.

**Allocation of Benefits and Costs by Regulated Rate Provider**

**15 *Owner and Rocky-Power Position Statement***

The Owner and Rocky-Power, through customized reports generated from the billing system and its accounting application, shall ensure economic benefits and cost allocations are that of which are identified in the regulated rate and distribution tariffs.

**DIVISION 2, SEPARATE RECORDS AND ACCOUNTS**

The following position statements address the following sections of the Code:

- Part 3, Division 2, 27, Records and Accounts
- Part 3, Division 2, 28, Written Financial Transactions
- Part 3, Division 2, 29, Transactional Records
- Part 3, Division 2, 30 Maintaining Records

**Records And Accounts**

**16(i) *The Owner Position Statement***

The Owner, acting as wires service provider, will comply with Section 27(3)(a)(b)(c) and (d) of the Code.

**(ii) *Rocky-Power Position Statement***

Rocky-Power, acting as Regulated Rate Provider to the Owner, will comply with Section 27(4)(a)(b)(c) and (d) of the Code.

**Written Financial Transactions**

**17 *The Owner and Rocky-Power Position Statement***

All financial transactions between Rocky-Power and the Owner, including without limitation of the foregoing transactions entered into by the Owner for the benefit of Rocky-Power, shall be uniquely identified and in writing. If transactions exceed \$500,000.00 annually, Rocky-Power shall document and supply evidence of fair market value, as offered by major chartered financial institutions or through other relevant means.

**Maintaining Records**

**18 *The Owner and Rocky-Power Position Statement***

The Owner and Rocky-Power shall maintain for a minimum of 7 years all financial records, accounts, financial transactions, reports, logs, audits, and plans as required by the compliance plan and the Code. All back-up documentation shall also be retained for seven years, and will be made available to the Auditor upon request.

**Training Records**

**19 *The Owner and Rocky-Power Position Statement***

Name dates and times of training for directors, officers, employees, agents and contractors of the Owner and Rocky-Power shall be retained in human resources files and made available to the Auditor upon request.

**Consent Forms**

**20**     *The Owner and Rocky-Power Position Statement*

Consent forms will be retained for a period of seven years and be made available to the Auditor upon request. All signed consent forms will be logged and the log made available to Auditor upon request. A transmittal log, and related documentation will also be made available to the Auditor upon request.

## ***PART 4, COMPLIANCE REQUIREMENTS***

### ***DIVISION 1, COMPLIANCE PLANS and REPORTS***

The following position statements address the following sections of the Code:

- Part 4, Division 1, 31, Compliance Plan and Reports
- Part 4, Division 1, 32, Approval by the MSA
- Part 4, Division 1, 33, Changes to the Compliance Plan
- Part 4, Division 1, 34, Quarterly and Annual Reports
- Part 4, Division 1, 35, Information About the MSA
- Part 4, Division 1, 36, Publication of Plans and Reports
- Part 4, Division 1, 37, Release From Obligations Under Regulation

### **Changes to Compliance Plan**

#### **21 *The Owner and Rocky-Power Position Statement***

The Owner and Rocky-Power shall, within 60 days, update its compliance plan as a result of a change of circumstances or changes to regulations. Prior to implementation Rocky REA and Rocky-Power shall obtain approval from the MSA and the directors of the Owner and Rocky-Power of such changes.

Upon approval of the updated compliance plan the Owner and Rocky-Power shall:

- As required, provide a copy and training of the approved new compliance plan to:
- The directors, officers, employees, contractors and agents of Rocky-Power.
  - Records of attendance and completion shall be maintained and made available to the Auditor upon request.
  - At their discretion, will post on its web-site, changes to the compliance plan for communication purposes to its directors, officers, employees, contractors and agents affected by the changes.

### **Quarterly and Annual Compliance Reports**

#### **22 *The Owner and Rocky-Power Position Statement***

Within 30 days of each calendar year end, or such other period as the MSA may allow, the Owner and Rocky-Power shall provide to the MSA an annual compliance report as described in Section 34(2) of the Code.

At a minimum of quarterly, the Owner and Rocky-Power shall provide a compliance report to the MSA, in accordance with section 34(1) of the Code.

The report(s) will describe:

- Any non-compliance to the Code and compliance plan.
- Action taken to remedy non-compliance.
- All complaints of non-compliance to the Code or the compliance plan.
- Action taken to address complaints.

### **Information about the Market Surveillance Administrator**

**23** *The Market Surveillance Administrator (“MSA”) is an independent body created under the Alberta Utilities Commission Act to help ensure the fair, efficient and openly competitive operation of Alberta’s electricity markets and retail natural gas markets. The Code of Conduct Regulation governs aspects of the retail electricity market, including the conduct of owners of electric distribution systems and affiliated retailers. Any person who feels that a contravention of this Regulation has occurred may submit a complaint to the MSA, by following the process set out in section 51 of the Act. Copies of this Act and Regulation may be obtained through the Queen’s Printer (Alberta). The MSA can be reached by telephone at (403) 705-3181. For additional information with regard to the MSA, please visit their website at [www.albertamsa.ca](http://www.albertamsa.ca).*

### **Publication of Plans and Reports**

#### **24** *The Owner and Rocky-Power Position Statement*

The Owner and Rocky-Power shall provide to the member upon request a copy of its compliance plan. The MSA may at its discretion also provide to the member, some or all of the contents of the compliance plan or the annual compliance report.

### **Release from Obligations under Regulation**

#### **25** *The Owner and Rocky-Power Position Statement*

The Owner and Rocky-Power recognizes that adherence to this compliance plan does not release any obligation to comply with the Code.

**DIVISION 2, COMPLIANCE AUDIT**

The following position statements address the following sections of the Code:

- Part 4, Division 2, 38, Appointment of Auditor
- Part 4, Division 2, 39, Approval of Audit Plan
- Part 4, Division 2, 40, Audit
- Part 4, Division 2, 41, Audit Report

***The Owner and Rocky-Power Position Statement***

The Owner and Rocky-Power will meet the audit provisions of the Code, as directed by the MSA.

To the extent of any Code related audit, references in this compliance plan to “Auditor” shall be understood to mean the party, independent from the Owner and Rocky-Power, carrying out the audit as directed by the MSA.

The Owner and Rocky-Power shall ensure that the Auditor has access to all directors, officers, employees, contractors, agents, information, information systems records and logs and other documentation maintained by and on behalf of the Owner and Rocky-Power pursuant to the compliance plan and the Code, for the purposes of any audit. In addition to the above, the Owner and Rocky-Power shall provide or make available in support of its quarterly and annual compliance reporting, and for audit purposes, the following:

- Copies of the approved Owner’s newsletters.
- Copies of sales and marketing communications to regulated members.
- Copies of the log reports regarding provision of member information to members and retailers.
- Details of all contraventions of the Code or this compliance plan by directors, officers, employees, contractors, or agents of the Owner and Rocky-Power.
- Details of resolution will also be included.

## PART 5, COMPLAINTS, EXEMPTIONS AND EXCEPTIONS

### Complaints

#### **26** *The Owner and Rocky-Power Position Statement*

In the best interests of members and retailers, the Owner and Rocky-Power shall work with the MSA to resolve any complaints involving the Owner or Rocky-Power. If required, inquiries pertaining to complaints received by the MSA regarding the Owner or Rocky-Power will be directed to:

Jerry Reglin  
General Manager,  
**Rocky Rural Electrification Association Limited**  
403 845-4600  
[jreglin@rockyrea.com](mailto:jreglin@rockyrea.com)

All external complaints directly received by the Owner or Rocky-Power shall be routed to the General Manager. All complaints received directly by the General Manager shall be documented, investigated, and reported to the MSA. Further, all complaints shall be documented in the quarterly and annual compliance reports.

Investigation and resolution results shall be communicated to the originator of the complaint in writing. The Owner and Rocky-Power will, to the best of its ability, resolve complaints internally.

Reports regarding resolution shall contain the following:

- Name of Organization or Person Filing Complaint
- Name of Organization Representative
- Nature of Complaint
- Date of Complaint
- Details of Complaint
- Owner, Rocky Power Representatives
- Name of Other Parties (as deemed appropriate)
- Resolution Details
- Date of Resolution

In the event that the originator of the complaint does not feel that the issue has been satisfactorily resolved, an appeal may be directed to the General Manager and notification sent to the MSA. Any appeal received by the General Manager will be administered and documented in a timely manner, and the outcome reported in writing within 30 business days to the appellant and to the MSA.

Should the appeal outcome not meet the originator's satisfaction, a direct complaint may be launched with the MSA or additional action taken at the discretion of the complainant.

### **Alternate Compliance Arrangements**

#### **27     *The Owner and Rocky-Power Position Statement***

Prior to implementation of compliance plan updates, the Owner and Rocky-Power recognizes, approval by the MSA shall be obtained.

### **Emergency Exceptions**

#### **28     *The Owner and Rocky-Power Position Statement***

At its discretion, the Owner and Rocky-Power reserves the right to waive this compliance plan or the Code in response to an emergency that threatens public safety, the safety of respective officers, employees, agents or contractors, the physical integrity of its facilities or system reliability.

Any such exceptions will be documented and reported to the MSA within thirty days of occurrence. A summary report of any occurrences will also be contained in the quarterly and annual reports, and made available to the Auditor upon request.

## **PART 6, TRANSITIONAL PROVISIONS, REPEAL AND COMING INTO FORCE**

### ***The Owner and Rocky-Power Position Statement***

The Owner and Rocky-Power compliance plan comes into force immediately following approval by the MSA and remains in effect until such time as determined by the MSA.

## PART 7, COMPLIANCE PLAN APPROVALS

Upon approval by the MSA, Rocky Rural Electrification Association Limited and Rocky Rural Power Division will hereby adopt this compliance plan. Contents in this compliance plan have been reviewed and accepted by the appropriate regulatory bodies.

**Rocky Rural Power Division**  
**Rocky Rural Electrification Association Limited**

Signature: \_\_\_\_\_  
Earl Graham, Chairman

Date: \_\_\_\_\_

Signature: \_\_\_\_\_  
Jerry Reglin, General Manager

Date: \_\_\_\_\_