

July 29, 2016

Derek Olmstead
Senior Economist & Retail Market Coordinator
Market Surveillance Administrator
Suite 500, 400 - 5th Avenue SW
Calgary, AB T2P 0L6

(delivered by e-mail)

Dear Mr. Olmstead:

RE: Stakeholder Consultation on Publication of Retail Market Data

Thank you for your correspondence dated July 22, 2016 pertaining to the Retail Market Data posted by the MSA on its website. The Utilities Consumer Advocate (“UCA”) appreciates the opportunity to provide input on this matter for your consideration.

The UCA represents the interests of residential, farm and small business consumers of electricity and natural gas electricity and natural gas consumers in Alberta. The UCA uses the Retail Market Data published by the MSA to identify and monitor issues in the retail market that have an impact on consumers. The UCA conducts analysis with this data which is used to represent consumers’ interests in regulatory proceedings before the AUC and in new policy developments. It is important for the UCA to have access to electricity and gas market share data, churn data, customer acquisition rates, and switching rates for both regulated providers and competitive retailers in order to conduct accurate and comprehensive analysis and better represent consumers’ interests.

The UCA understands the MSA is seeking stakeholder’s feedback on the proposed data format before publishing the new data to MSA’s website later in 2016.

In response to the specific items provided in Section 3 of the Publication of Retail Market Data document issued by the MSA on June 8, 2016¹, the UCA submits the following comments for your consideration.

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

The UCA agrees with this proposed change. The UCA uses the Retail Statistics data to complete monthly internal reports and this proposed change would improve the accuracy of our reports.

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.

¹ <http://albertamsa.ca/uploads/pdf/Archive/0000-2016/2016-06-08%20Publication%20of%20Retail%20Stats.pdf>

The UCA submits the data should be posted with a high degree of precision. The UCA requires actual data, as opposed to graphical presentation, in order to conduct accurate analysis of issues in the retail market and effectively represent the interests of consumers in new policy developments and regulatory proceedings.

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

The UCA agrees with the proposed delay of three months before posting the data.

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.

Unless there is an adverse effect on competition, the UCA submits a lower threshold (1%) should be used to provide more detailed data for competitive retailers.

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

The UCA submits that all consumer classes listed in the MSA's Publication of Retail Market Data document (residential, small commercial and industrial, large commercial and industrial, and farms) should be included for all reports. It would be helpful for the UCA to have access to actual market share numbers in each consumer class for electricity and natural gas and for both regulated providers and competitive retailers.

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

The UCA submits that more detail in the reports is better and that small electricity zones should not be combined into one group labelled 'other'. The data should be provided as a breakdown to allow the UCA to identify or investigate any issues that have an impact on consumers in these zones.

Thank you for your consideration of our comments on the Publication of Retail Market Data. Should you have any questions, please contact Megan Gill at (403) 476-4998 or Megan.Gill@gov.ab.ca.

Sincerely,

Megan Gill

Manager, Market Policy & Analysis

The Office of the Utilities Consumer Advocate