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March 29 2018

Alberta Electric System Operator  
Calgary Place, 2500, 330 – 5th Avenue SW  
Calgary, AB T5P0L4

**Attention: Doyle Sullivan**  
**Director, Tariff Design**

Dear Mr. Sullivan:

**Re: 12 Coincident Peak Issue Session**  
**Proceeding ID 22942**

1. EPCOR Distribution & Transmission Inc. (“EDTI”) provides the following comments on the 12 Coincident Peak Issue Session held by the Alberta Electric System Operator (“AESO”) on March 12, 2018.
2. EDTI is in general agreement with the five rate design principles listed by the AESO in its presentation on March 12<sup>th</sup>.
3. EDTI does not have any specific comments on the positions presented by each of the other parties.
4. EDTI remains concerned that, given the diverse positions put forward by the other parties, issues may be present with the 12 coincident peak method and that further analysis including updating of the relevant portions of the cost of service study by the AESO are warranted.
5. Please contact me directly if you have any questions with respect to this letter.

Sincerely,

*[Electronically Submitted]*

Saqib Chaudhary  
Director, Regulatory Affairs  
EPCOR Distribution & Transmission Inc.