

Rule 024 and Micro-Generation Application Process Questionnaire

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1 a. Unlimited self-supply and export eliminate the need for this requirement. Barring an allowance for unlimited self-supply and export, micro-generators should be allowed to use either an average of the past five years or the previous twelve months, whichever is greater.

1 b. In the absence of Historical Usage File (HUF) data, wires owners should follow a standardized calculation accounting for general electrical usage, large appliances, and heavy electrical load devices (such as electric vehicles, EV chargers, heat pumps, etc.). EnerGuide labels could be used to render such calculations more accurate.

Alternatively, a home energy assessment could provide customers with a clearer understanding of energy retrofits (such as solar PV systems) that might further reduce annual consumption.

1 c. An allowance for unlimited self-supply and export would negate the need for a minimum level of proof that a customer intends to increase their electricity consumption, whether shortly after installing a micro-generation system or further into the future. In the absence of said allowance, proof of purchase should be sufficient. The minimum level of proof should only apply to energy-intensive devices such as electric vehicles, heat pumps, EV chargers, and large electric appliances such as dryers and stoves/ovens.

Moreover, according to Solar Alberta¹, a heat pump cannot be included in the initial calculations when connected to a natural gas furnace. The additional requirement for a full year of data before a heat pump can be included in the solar sizing process is a further barrier to the adoption of more energy-efficient technologies.

1 d. Calculations that include tilt, azimuth, size, geographic location, potential shading, and

equipment specifications are reasonable expectations for solar installers as part of customer quotations. This information, in addition to a site plan and any technical layouts, should also be provided to customers as part of the hand-off package at the time of system commissioning.

An allowance for self-supply and export would negate the requirement for a microgeneration generating unit's yearly energy output. Nevertheless, every customer should receive a copy of the calculations for the size of the system installed.

2 There do not need to be mechanisms for monitoring compliance after the system is approved. This is especially true if there is not limit on the amount of supply generated. Monitoring compliance increases costs and time required to report, which increases the barriers to entry.

2 a. Additional requirements for post-approval compliance monitoring will only serve to deter customers from engaging in the micro-generation process.

3. I do not see the need for inverter de-rating.

4. Pre-screening seems like a bad idea. I don't see the benefit of that: it just adds another layer of complication.

5. A working group would ensure that the AUC's guidance evolves in tandem with national and/or international standards, minimizing misalignment. It would also provide a forum for proactively flagging emerging technical shifts, helping the AUC stay ahead of industry trends rather than reacting to them after confusion arises.

Moreover, micro-generators would benefit from clearer, up-to-date expectations, potentially reducing application errors, rejections, and delays. Having a forum for utilities, regulators, and industry to jointly discuss standards may help preempt disputes and lead to more pragmatic policy adjustments.

Most importantly, a working group would support a more nuanced and grounded regulatory process by embedding real-world technical insight into guidance documents.

5 a. Quarterly

6. I strongly believe that Alberta should maintain the pillars of the Micro-Generation Regulation, which have enabled it to be the best province for micro-generators in Canada.

1. The One-to-One Ratio: Alberta micro-generators are paid and credited at the same rate for energy exports and imports, respectively.

2. Solar Specific Retail Plans: Continue to enable Alberta micro-generators to switch from a higher electricity rate to a lower one when it is financially advantageous.