

## **Submission to Alberta Utilities Commission Re: Rule 024 Consultation – Micro-Generation**

Submitted by:

Name: Chris Niles

Location: 116 Bailey Ridge Place Turner Valley, Alberta T0L2A0

Installation: 13.4 kW solar photovoltaic system, net-zero energy home

Date: June 23-2025

Subject: Rule 024 Questionnaire Response

### **Introduction**

As a homeowner in Turner Valley who has invested in a 13.4 kW solar system and designed our residence to operate as a net-zero energy home, I appreciate the opportunity to respond to the Alberta Utilities Commission's (AUC) review of Rule 024. Alberta stands at an energy crossroads. The choices made now will define whether our province is positioned to lead in the 21st-century energy economy or remain tethered to outdated utility models that hinder innovation, investment, and energy independence.

Globally, jurisdictions from Germany to California, Denmark to Australia, are embracing distributed energy resources (DERs) not only to cut emissions but to increase grid resilience and lower long-term costs. Alberta must ensure that its regulatory frameworks do not punish innovation but rather enable the kind of forward-thinking that modern energy systems require.

### **Response to AUC Questions for Micro-Generators**

#### **1. What has your experience been like as a micro-generator under Rule 024?**

Our experience has been a mix of pride and frustration. While we were able to connect our 13.4 kW system and begin producing energy relatively smoothly, we have encountered ambiguity regarding compensation, eligibility caps, and metering requirements that seem designed for a different era. The rule's intent—to encourage self-sufficiency and reward clean generation—is undermined by red tape and uncertainty about how credits are calculated and administered. Additionally, the restriction that prevents exporting more than 100% of annual energy use does not align with how homes are evolving in energy consumption (e.g., EVs, heat pumps, battery storage).

#### **2. Do you have concerns about how eligibility is defined or how export limits are applied?**

Yes. The existing eligibility rules and export limits are increasingly misaligned with actual usage patterns in modern net-zero homes. For example, our annual consumption is currently balanced, but we plan to add an electric vehicle and heat pump in the near future. Current rules penalize us for producing "too much," yet don't accommodate future load growth unless we engage in speculative consumption estimates. Other leading jurisdictions, such as California and Germany, encourage overproduction when it supports overall grid

decarbonization and resilience.

We believe eligibility should be flexible, forward-looking, and accommodate homeowners planning for increased electricity use and energy independence. Export limits should be lifted or significantly raised to reflect that solar homes are not just consumers but contributors to grid reliability.

### **3. Should Rule 024 better distinguish between small and large micro-generators?**

Yes, but not by adding barriers. A clearer and more supportive distinction could ensure that smaller residential systems are not caught up in regulatory burdens meant for larger, commercial installations. At the same time, all micro-generators should be able to benefit equitably from exporting clean energy. Interval metering and complex tariffs should not be required for small-scale systems, and any cost allocation must be transparent and justified.

### **4. What changes to the application process would make it simpler and more accessible?**

The process today is opaque and bureaucratic. Alberta needs a digitized, streamlined, and homeowner-friendly platform—something akin to “Solar Easy Alberta.” Globally, countries like Australia and Germany have simplified micro-generation applications through centralized digital portals and standardized documentation. Alberta should adopt a one-window system for approval, permits, metering, and retailer notification. This would reduce administrative burden on both homeowners and utilities.

### **5. Do you believe the metering rules and costs are fair and transparent?**

No. There is insufficient transparency around the metering decisions made by wires owners, and micro-generators are sometimes forced to accept interval meters and their associated costs without justification. In our case, we were told a cumulative bi-directional meter would suffice, yet the retailer later suggested a different approach without explanation. Alberta should mandate full transparency on metering cost structures and prohibit unwarranted cost transfers to residential micro-generators under 30 kW.

### **6. Should micro-generators be allowed to aggregate sites or net across multiple properties?**

Yes. Aggregated metering and virtual net metering are critical tools used in other advanced jurisdictions (e.g., New York, Vermont, and the Netherlands) to encourage solar and storage on rental properties, farms, and community projects. Alberta's restrictive site-based model holds back innovation and adoption, particularly in rural areas where energy costs are high and grid expansion is costly. Aggregation aligns with modern energy systems that are flexible and decentralized.

### **7. Do you support time-of-use (TOU) pricing or dynamic export rates?**

Cautiously. TOU pricing and dynamic rates can support grid stability if implemented fairly and with robust consumer protections. However, variable export pricing can penalize micro-generators by devaluing clean energy simply because it is produced during “non-peak” hours. Alberta must ensure that any move to TOU rates rewards rather than penalizes prosumers. TOU should be voluntary and accompanied by the ability to store and self-consume.

### Broader Perspective

Globally, countries are aligning their energy markets around climate resilience, local generation, and distributed storage. Alberta has an opportunity to harness this momentum, empower homeowners, and modernize its grid. Rule 024 must evolve to reflect this new reality.

We, as Albertans, have invested in solar not only to reduce our bills, but to contribute to a cleaner, more resilient grid. It is essential that the regulatory environment treat us as partners—not as problems to be contained.

### Closing

I urge the AUC to modernize Rule 024 to reflect global best practices, support future energy demand growth at the household level, and remove regulatory friction for residential solar producers. The energy transition is not on the horizon—it is here. Alberta can either embrace it or be left behind.

Sincerely,

A handwritten signature in black ink, appearing to read "Chris Niles". The signature is fluid and cursive, with the first name "Chris" written in a larger, more prominent script than the last name "Niles".

Chris Niles  
Turner Valley, Alberta  
13.4 kW Solar PV System  
Net-Zero Home