

## Rule 24 and micro generation application processes

Q1: I do not understand the reason for limiting microprocessors to their usage. I don't believe there is any technical reason for doing this, and therefore I prefer to see unlimited self supply and export with a defined maximum of how much energy a site can produce to be defined as a micro processor; That may mean different maximums for single family homes; farms; multi-unit dwellings; commercial buildings.

If we must stick with a limits, then for existing sites, the average of the prior 5 years seems most reasonable. Annual usage can fluctuate based on weather and other factors. If clients predict future increased energy needs due to changing from natural gas appliances to electrical heat pump technology or addition of electrical vehicles, there should be a standard annual average that can be added to their total allowed solar.

Where the site has no history, average usage for that area should be used (I know that Enmax can report on such things)

Q2: I do not see the need to perform post approval compliance monitoring for microprocessors. I do not see any drawback to individual homeowners (including farms) adding more to they electrical system than they take out.

Q3: There are rules and processes in place for increasing the capacity of a microgeneration system. There is no good reason to put additional costs and burdens on homeowners to de-rate or otherwise limit the systems post-approval and installation.

Q4: I don't see the benefits of this approach, it looks like additional burdens for no reason.

Q5: It may be beneficial to have a working group to manage, however the risk of such groups is always that those who've been in the game longest have unreasonable power to influence decisions resulting in stagnation of innovation

Q6: For Q6, I am going to quote directly from the Solar Club's proposed response to this feedback process as I don't think I could say it any better:

The Government of Alberta's Micro-Generation Regulation, has been instrumental in promoting a greener grid and stimulating significant investments made by Alberta homeowners, businesses, and our farming community to add solar to their rooftops. This is truly a grassroots economic development success story, with hundreds of people employed in the solar industry. Over \$750 million has been funded by Alberta homeowners to add solar energy to power their homes, and the surplus green energy is exported to the grid. Other provinces undoubtedly envy Alberta's rooftop solar business model and our province's Micro-Generation Regulation.

**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.

Furthermore, long lead times for micro-generation application processing in rural areas negatively impact the willingness of customers to become micro-generators. The Government of Alberta has engaged in a process to reduce red tape across multiple industries. The questions the AUC is asking, if applied without consultation, would result in additional red tape, further delaying the process. If the AUC's goal is to address stakeholder concerns about application processing, many of the issues highlighted in questions posed by the AUC will have the opposite effect.