

Consultation feedback is below:

1. Standardization of methodology and info requirements for usage/output estimates

Standardized calculations should be optional. Customers should be free to oversize their systems beyond current usage with minimal burden of proof.

a. Historical timespan for energy usage

The past 12 months is sufficient, but this should not be a constraint on system sizing.

b. Projecting future energy usage

Customer declarations of intended usage (e.g., EVs, heat pumps) should be accepted at face value with no supporting documentation required.

c. Minimum proof for increased consumption

A signed statement from the customer should suffice. Utilities should not demand receipts or detailed documentation.

d. Energy output calculation (shading, partial coverage, etc.)

Estimates should default to NRCAN "Annual Photovoltaic Potential" values for a location. Customer claims on shading or partial coverage should be accepted at face value.

2. Importance of post-approval monitoring

Post-approval monitoring is unnecessary. Customers should not be constrained to match usage with production, and enforcement wastes resources.

a. Responsible party for monitoring

If required, responsibility should fall on the AUC, but ideally, no monitoring is needed.

3. Inverter de-rating and capacity limits

Customers should be allowed to install oversized systems and use any compliant inverter. De-rating should be allowed if customer desires.

a. Permission to de-rate inverters

Yes. Customers should be free to de-rate or not. Utilities should not dictate inverter choices or configurations.

4. An initial sizing determination phase is useful only in the sense of helping a customer

size their install.

5. Establishing a working group to discuss inverter standards seems unnecessary. If equipment is CSA certified, that should be good enough.

6. It's crucial for the AUC to enforce a timely response protocol for Fortis regarding customer applications. Their past and current delays hinder the adoption of micro-generation solutions. An established timeframe for responses would significantly improve customer experiences and encourage more widespread use of renewable energy technologies.