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| |  |  | | --- | --- | | **Comments from:  *(company/stakeholder name)*** |  | | **Date [yyyy/mm/dd]:** |  | | |  |  | | --- | --- | | **Contact name  (*for companies*):** |  | | **Phone:** |  | | **Email**: |  | |

**Instructions:**

1. Please download this document in order to view the draft blackline changes correctly.
2. Please fill out the demographic/contact information above.
3. Please review [Bulletin 2025-13](https://media.auc.ab.ca/prd-consultation/sites/2/2025/10/Bulletin-2025-13.pdf) and the following blackline documents: [Rule 024: *Rules Respecting Micro-generation*](https://media.auc.ab.ca/prd-consultation/sites/2/2025/10/Rule024_blackline.pdf)*,* [Form A – Micro-generation Notice](https://media.auc.ab.ca/prd-consultation/sites/2/2025/10/Form-A-Micro-generation-notice.pdf), [Form B – Notice of Dispute](https://media.auc.ab.ca/prd-consultation/sites/2/2025/10/Form-B-Notice-of-Dispute.pdf), and the [Micro-generation notice submission guideline.](https://media.auc.ab.ca/prd-consultation/sites/2/2025/10/MicrogenerationNoticeSubmissionGuideline_blackline.pdf)
4. Please review the proposed changes below, along with their rationale, and provide your specific comments in the boxes provided. If you do not agree with a proposed change, please provide justification for your position and suggest any alternative or further proposed revisions.
5. You can submit comments on as many or as few of the proposed changes as you wish. Blank boxes will be interpreted as neutral/favourable.
6. If a change from the blackline documents does not appear in the table below, it is considered administrative. You may provide comments on administrative changes in the general box at the end, if necessary.
7. Please be aware that certain issues, particularly those related to the *Micro-generation Regulation* and other government policy matters, fall outside of the Alberta Utilities Commission’s rule-making authority (see Bulletin 2025-13 for more details). The AUC is not able to consider any comments or suggestions related to such issues.

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| **Form A** | | | |
| **Page/Section** | **Proposed change** | **Rationale** | **Stakeholder comments** |
| Page 2, Section 3 | Do the inverters comply with the appropriate UL1741 Supplement Standard for Inverters, Converters, Controllers and Interconnection System Equipment for Use with Distributed Energy Resources? | Inverter standards may change quickly, especially with regard to different service areas. To avoid situations where AUC documents are technologically out-of-date, the specific reference to UL1741 was made general.  (Also present in Micro-generation notice submission guideline). |  |
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| **Form B** | | | |
| **Page/Section** | **Proposed change** | **Rationale** | **Stakeholder comments** |
| Pages 1-2 | **If dispute is related to Section 2(2) or 2.1(2):**  Has the wires owner served the customer with notice within 14 days? Yes No  Please provide the following information, if available:   * The maximum acceptable system size for the customer’s actual past or projected future consumption, as determined by the wires owner. * The customer’s annual electricity consumption for the past 12 months (for existing sites). * The customer’s average annual electricity consumption for the past three and five years (if available). If the customer does not have consumption data dating back to three or five years, please provide the average annual electricity consumption for the maximum amount of time available and specify the time period used. * The report or energy projections that the wires owner used to project future annual consumption (for new sites). * Please attach document(s) separately. * The approximate percentage discrepancy between the customer’s annual electricity consumption and the expected generation of the proposed system (e.g., if consumption is 100 kW and generation is expected to be 200 kW, respond with ‘200%’). * Any calculations representing the output of the proposed microgeneration unit, either conducted by the wires owner or provided by the customer’s installer. Please specify all known assumptions and variables. * Please attach document(s) separately. * If the customer has requested a system size that is expected to generate well in excess of annual consumption due to future load increases, the evidence that the customer has supplied to the utility to justify the load increases. * Please attach document(s) separately. * Manufacturer documentation relating to any proposed inverter derates, attached separately. | The *Micro-generation Regulation* does not specify information requirements for disputes, but enables the AUC to set them as part of its process. In the event of a dispute, this information would be requested. Requesting it upfront encourages standardization in wires owner’s processes and makes disputes more efficient. Note that the information is requested *if available,* allowing some flexibility for various situations. |  |
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| **Micro-generation notice submission guideline** | | | |
| **Page/Section** | **Proposed change** | **Rationale** | **Stakeholder comments** |
| Page 3 | Future load additions may be considered if there is sufficient evidence acceptable to the wires owner (proof of purchase, stamped engineering drawings, inspection reports, etc.) that consumption will increase. | This is intended to provide greater clarity upfront to microgeneration customers and wires owners. |  |
| Page 4 | Information about the *Small Scale Generation Regulation* added to the comparison table. | Some proposed microgeneration projects would be better classified as small scale generation. The table aims to provide a quick way for customers and wires owners to compare the features of various kinds of generation. |  |
| Pages 4-5 | Note that small scale generation units, despite some similarities to both distributed generation units and micro-generation units, are distinct from both. The *Small Scale Generation Regulation* is unique in that it contains provisions for community generation units, which are subject to a community benefits agreement (see Section 3 of the *Small Scale Generation Regulation)*.  If you intend to operate a renewable or alternative energy generation unit for profit (as micro-generation unit generation is intended to cover all or a portion of the customer’s total annual energy consumption, per Section 1(h)(ii) of the *Micro-generation Regulation)*, or one that is larger than five MW, you should discuss how to apply to be a small scale generator with your wires owner. | This expands upon the information added to the table, providing additional detail on the unique features of small scale generation. |  |
| Page 10 | Wires owners are encouraged to provide milestone and project completion timelines to customers at the beginning of a microgeneration project and whenever changes occur during the process. Where timelines are unpredictable or unknown, wires owners are encouraged to provide customers with regular updates and respond to customer inquiries promptly. Customers are also encouraged to respond to wires owner’s questions or requests promptly, and to provide all requested information and documentation to the best of their knowledge and ability. | To encourage efficient completion of projects, this provides a framework for communication expectations throughout the microgeneration application and commissioning processes. |  |
| Pages 12-13, Section 14 | If the wires owner determines that the costs of connecting a particular micro-generating unit are extraordinary, and the Commission agrees, then the wires owner may require the proponent to reimburse the extraordinary portion of the costs. | The original wording has been revised to improve clarity around the potential process for wires owners classifying interconnection costs as “extraordinary.” |  |
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| **General** | | | |
| Please provide any other feedback you have on the AUC documents, including other proposed changes. Please be specific and provide rationale for all suggestions. Note that the AUC cannot consider changes proposed to the *Micro-generation Regulation* or government policy. | | **Stakeholder comments:** | |