AUC
Alberta Utilities Commission

Rule 024 engagement questionnaire

Comments from *(company/stakeholder name)*:	ATCO Electric Ltd.	**Contact name *(for companies)*:**	Greg Marghella
Date [yyyy/mm/dd]:	2026/09/08	**Phone:**	[redacted]
Role:	Distribution Facility Owner	**Email**:	[redacted]

Instructions

1. Please download this document.

2. Please review Bulletin 2026-10 and the blackline document for Rule 024: *Rules Respecting Micro-Generation*.

3. In the box above, please provide your name, your organization's name (if applicable), and the role(s) that best describe(s) your participation in the microgeneration field (customer, consultant, developer, distribution facility owner, transmission facility owner, government agency, non-governmental organization, microgeneration proponent, etc.).

4. Some of the questions included in this engagement apply only to specific roles (such as microgeneration customer/proponent, distribution facility owner, etc.). Please only answer questions relevant to your self-identified role(s) and/or experience. You do not need to complete every question to participate in this engagement. Incomplete questionnaires will be accepted.

5. Where you provide any recommendations, please include reasons or justifications.

6. Submit your response to engage@auc.ab.ca. In the email, please include the following subject line: **Rule 024 engagement**.

Questions

Timelines

1. Please briefly describe your experience with the timelines to connect microgeneration generating units. Where applicable, please explain any differences between the connection for small (<150 kW) and large (150 kW – 5 MW) microgeneration generating units.

ATCO has experienced significant growth in Micro-Generation (MG) applications over the past five years. ATCO received 191 MG applications in 2023, 466 in 2024 and 1,468 in 2025, demonstrating a significant acceleration in customer growth. Applications tend to be seasonal with a significant number coming in the Spring and Summer.

MG Application Approval Process:

Generally, the review and approval of small inverter-based MG applications is straightforward and can be completed efficiently. ATCO's most common challenge in processing MG applications is the receipt of incomplete information from customers in support of their applications, and the significant oversizing of MG systems compared to their annual consumption, despite the availability of application guides, checklists, and supporting materials that outline MG application requirements and eligibility under the *Micro-generation Regulation*. Other common application deficiencies include missing information, insufficient technical support, lack of evidence supporting forecast load growth, multiple MG applications for various MG system sizes (for the same customer), and provision of incomplete equipment specifications.

Larger MG proponents are typically more versed in terms of MG requirements needed for the application process. However, additional technical assessments and customer engagement are often required to address safety and interconnection considerations, which require time to conduct and an increase in communications with customers.

ATCO's practice in processing MG applications is to work collaboratively with customers and their consultants to obtain the information necessary to complete its assessment rather than to immediately deny an application or to initiate a dispute. While this approach improves customer experience and minimizes unnecessary regulatory burden, it does increase costs and may extend customer timeline expectations.

In the past, ATCO has suggested that consideration be given to a price signal to encourage the submission of complete applications. One option would be the implementation of an application fee, which could help incentivize customers to provide the required information at the outset, and, therefore, reduce administrative costs associated with repeated information requests and application revisions.

Connection Process:

As discussed above, ATCO notes that the *Micro-Generation Regulation* governs the application process. With respect to the physical connection process, once an MG application is found to be eligible as a MG generating unit, the customer proceeds through ATCO's standard connection process. ATCO's connection process is available on its website at https://electric.atco.com/en-ca/connections-services/new-connections-changes.html.

Specifically, after receiving approval under the *Micro-Generation Regulation*, in addition to fulfilling all of ATCO's technical requirements for service connection including any required upgrades and agreements, it is the responsibility of all MG customers to obtain all required municipal permits and approvals, and to engage a certified electrician to install the MG system. Once ATCO receives a request for connection along with the required documentation, ATCO dispatches a certified Power Line Technician (PLT) to exchange the meter and commission the system. This includes verifying the system's safe operation, confirming that the installed equipment aligns with the approved application, and exchanging the existing meter as required. ATCO also has a large service territory, which presents operational challenges in meeting the influx of final site visits and often means different electrical safety inspection and permitting requirements.

Like other customer connection requests, after the MG system is ready for commissioning, ATCO generally targets completion as soon as possible once receiving all required documentation. However, timelines may vary depending on factors such as request volumes, system priorities, planned work schedules, outages, or emergency events on ATCO's side, and MG system install completion, obtaining electrical permits, getting final inspections completed on the applicant's side.

ATCO emphasizes that connection timelines must be balanced with the need to maintain system safety, reliability, and the prudent management of costs that are ultimately borne by customers through distribution rates. In some cases, connection timelines may be extended where upstream system upgrades or other network modifications are required.

2. Have you observed or experienced delays in the microgeneration connection process? If yes, please explain the main contributing factors.

Please refer to Response 1 above. As discussed, the MG Application Approval process is completed within 14 days once the application is deemed complete, including a complete MG Application Form A with all required supporting documents, and the MG system is sized appropriately. The MG Application review process can be lengthy due to incomplete applications, oversized MGs, and/or customer changes made after the initial application is submitted. In addition, as ATCO cannot control the application volumes at any point in time, ATCO has seen limited slippage in the 14-day turnaround once an application is deemed complete.

ATCO notes that any delays that may occur for the MG Connection process (after micro-generation approval) including delays related to installation of the micro-generation system, submission of required permits, provision of final inspection reports, or execution of the Interconnection Operating Agreement (IOA), are the responsibility of the customer and are outside the control of the Distribution Facility Operators (DFO). Upon a PLT going to site, ATCO has observed common delays relating to the safety inspection step, where challenges such as snow-covered panels during winter months, access to customer roofs and cloudy weather prevent the MG system from producing enough to verify safety standards such as anti-islanding.

a. If yes, is there more information that distribution facility owners could provide before the start of a microgeneration project to help reduce delays? Please comment on each of the suggestions below:

Please refer to Response 1 above. There are a variety of resources available through the AUC, DFO, and other industry websites that provide guidance on the micro-generation application process. However, ATCO is committed to continuously improving its customer communications and remains open to feedback and suggestions regarding the application experience.

For example, ATCO outlines the key steps in the micro-generation application process on its website: https://electric.atco.com/en-ca/connections-services/new-connections-changes/micro-generation.html. In addition, ATCO documents such as Customer Terms and Conditions and ATCO Standards for DER – Technical Interconnection Requirements are a requirement to be reviewed prior to submitting an MG Application Form A.

ATCO believes that timely submission of complete and accurate applications, including all required supporting documentation, would improve the efficiency of the MG process for both customers and DFOs. In this regard, an appropriate price signal may encourage applicants to invest additional effort upfront to ensure applications are complete before submission, thereby reducing rework, follow-up requests, and overall processing timelines.

ATCO's general process for service connection is outlined on this website: https://electric.atco.com/en-ca/connections-services/new-connections-changes.html

i. General information about phases of the connection process and associated minimum timelines

ATCO does not believe so. As mentioned above, ATCO provides ample information and resources on its external website, available at: Micro-Generation | ATCO Electric. Provisions on the interconnection of micro-generators are also available in ATCO Electric's Customers Terms and Conditions, available at: atco-tandcs-customer.pdf

ii. Comparison between connection timelines, phases, and other requirements for small and large microgeneration projects.

Timelines for the assessment for eligibility of a complete MG application is the same for Small and Large MG applications.

Following a MG application approval, complex Small MG projects and Large MG projects may require an increased timeline for connection in comparison to simple connections due to the need for detailed engineering review of the micro-generator's system impacts and any capacity constraints, potential upgrades on the system and the execution of a more comprehensive Joint Operating Agreement between the customer and the DFO.

Additionally, ATCO notes that typically customers will apply for Large MGs before procuring MG equipment and installing it so there will be a time gap between application approval and actual construction of the facilities and commissioning.

iii. An explanation of common circumstances that may lead to delays in the connection process or restarts of phases (including delays in customer/microgeneration proponent responses to owners' questions).

Please refer to Response 1 above. ATCO notes that approximately 99 percent of MG applications are for Small MG projects.

While the general phases and timelines of the application process are similar for both small and large MG projects, timelines may vary depending on project-specific circumstances. These may include, but are not limited to, the need for a detailed technical review, incomplete application information, requests for additional information, oversized system proposals without evidence of future load growth, changes to system size or configuration after the application has been submitted, or the need for upstream system upgrades to safely accommodate the MG facility prior to commissioning. Again, ATCO works with the customer throughout the application process to obtain the necessary information to ensure standards are met and safety is addressed prior to approving the MG application. ATCO does not view these as delays to meeting the 14-day requirement as outlined in the MG regulation but rather required steps to ensure customer satisfaction and the prudent testing of MG applications.

Each application is unique and must be assessed on a case-by-case basis. As a result, one application should not be considered representative of all applications. However, based on the approximately 1,600 micro-generation applications received by ATCO in 2025, approximately 80 percent were approved without significant issues or the need for extensive follow-up.

iv. Other (please explain).

N/A

b. If yes, is there more information that customers or microgeneration proponents could provide in their initial microgeneration applications to help reduce delays? Please comment on each of the suggestions below:

As outlined in Response 1 above, the completeness of the information provided at the time of application is a key factor in ensuring that an MG application can be reviewed and processed in a timely manner.

ATCO is not aware of any specific information that is not currently required that would materially improve the application review process. Rather, the greatest opportunity to improve processing efficiency is ensuring that applicants submit complete and accurate information in accordance with the applicable checklists, guidelines, and application requirements at the outset of the process. For example, on sizing of an MG, verifiable evidence of future load increases being provided initially, and not on request by the DFO, would greatly improve the process.

Complete applications reduce the need for follow-up requests, minimize delays associated with missing information, and support a more efficient review process for both customers and DFOs.

i. More accurate or detailed information about the technical specifications of their microgeneration project.

Please refer to the response to (a) above.

ii. Justification for the proposed microgeneration project's size with reference to the customer's annual energy consumption and evidence of any planned future upgrades.

Please refer to the response to (a) above.

iii. Other (please explain).

Please refer to the response to (a) above.

3. In your experience, how often are delays linked to the *Micro-generation Regulation*'s restriction of maximum microgeneration generating unit size to "all or a portion of a customer's total annual energy consumption"? Please explain.

ATCO estimates that approximately 80 percent of applications – or 1200 application out of the 1500 applications received annually –– do not have any issues and are approved in a timely fashion (within 14 days upon receipt of complete application). For the remaining applications, ATCO estimates that out of the approximately 300 applications that require additional information, the majority relate to oversizing or applicants not providing verifiable evidence of future loads.

4. **[Customers/microgeneration proponents only]** Are you generally aware of each of the following? For each 'no', please suggest how the information could be provided more accessibly.

N/A

a. Legislative requirements applying to microgeneration in Alberta.

N/A

b. Differences between microgeneration, small scale generation, and distribution-connected generation.

N/A

c. The terms and conditions of service that apply to microgeneration generating units in each distribution facility owner's service area.

N/A

5. **[Distribution facility owners only]** How many large microgeneration applications have you received in each year since 2023?

ATCO notes that, since 2023, 12 large MG applications have been received. Of those 12, 6 have been connected, 1 is pending connection, 2 are under evaluation, and 3 have been cancelled.

6. **[Distribution facility owners only]** How many large microgeneration projects have been cancelled in your service area after their application (i.e., Form A) was approved, and what are the general reasons for this (change to customer's plans, timeline delays, not enough available capacity, etc.)?

Since 2023, 3 large MG applications have been cancelled or not completed. Applications may be cancelled for a variety of reasons, and applicants are not required to provide ATCO with the reason for cancellation. For example, one Large MG Application was cancelled by the customer due to site aggregation requirements not being met, as the sites were connected to different feeders and subsequently, the customer later reapplied and connected as a small MG.

a. Are these projects typically cancelled after a specific step or milestone in the connection process (e.g. after a detailed level study, engineering/technical review, etc.)?

Please refer to the response to Question 6 above. There is no pattern or trend for Large MG cancellations.

b. How likely are large microgeneration projects to be cancelled after their application is approved compared to small microgeneration projects? Please provide a percentage comparison, if available.

As outlined in the response to Question 5 above, ATCO notes based on its experience that majority of the large MG projects have been connected.

i. Are there certain types of large microgeneration projects (e.g., specific fuel types, projects in certain areas, etc.) that are more likely to be cancelled than other types of large microgeneration projects? Please explain.

Please refer to the response to Question 6 above. Larger generators connecting in remote locations, with lightly loaded feeders, tend to have more system upgrades required.

ii. What sort of information could be provided to customers and microgeneration proponents, ahead of initial application submission, that could help decrease the number of cancelled large microgeneration projects?

Please refer to the response to Question 6 above.

7. Are participants in the microgeneration market, especially customers and microgeneration proponents, generally aware of the *Small Scale Generation Regulation*?

ATCO's website and MG page provides a link to *Small Scale Generation Regulation*, and a link to the AESO's SSG Program website: https://electric.atco.com/en-ca/connections-services/new-connections-changes/micro-generation.htmlATCO's website and MG page provides a link to *Small Scale Generation Regulation*, and a link to the AESO's Small Scale Generation Program website: https://electric.atco.com/en-ca/connections-services/new-connections-changes/micro-generation.html

a. Would greater awareness of the *Small Scale Generation Regulation* alleviate some issues with microgeneration applications? Please explain

Yes – awareness and education are helpful as it relates to energy needs and the opportunity for generators who are sized outside of the eligibility requirements for micro-generation.

b. **[Distribution facility owners only]** Have you connected any customers as small scale or community generators?

Since 2020, ATCO Electric has qualified 8 generators as Community Generators under the *Small Scale Generation Regulation*. Notice was given to the AUC for each of the qualifications. Of these applicants, the AUC approved 5 generators as Community Generators, however 2 approvals were rescinded. Of those who were eligible, all 3 generators have connected to the ATCO Electric system as Community Generators.

Cost Estimates

1. Do cost estimates for a microgeneration project connection typically change over the connection process? If so, please describe the circumstances.

Generally, cost estimates remain unchanged unless the customer modifies the scope, size, or configuration of the proposed MG project. This is particularly the case for straightforward applications where project requirements are well understood at the time of the initial assessment in the connection process.

For more complex or unique micro-generation projects, preliminary cost estimates may be refined as additional information becomes available through the detailed review process, including field assessments, engineering evaluations, and other technical investigations.

While the majority of micro-generation applications are relatively simple in nature, certain projects require additional technical assessment to determine system requirements and any associated costs. The need for such assessments is identified during ATCO's review of the application and is determined based on the specific characteristics of the proposed installation.

Today, at the MG eligibility approval stage, ATCO provides to the customer a high-level estimate of the potential extraordinary costs for connection of the project. ATCO believes this is the appropriate time of the connection process to inform the applicant of the potential for extraordinary costs to be borne by the customer.

a. What information could be provided, by distribution facility owners, customers, or both, that might reduce the likelihood or frequency of cost estimates changing significantly during the connection process?

ATCO provides a high-level estimate when scope is identified once an application is deemed eligible under the *Micro-Generation Regulation*. Once the project has been accepted by the customer, ATCO will refine its estimate to get a more detailed number. ATCO works collaboratively with the customer (and the customer's consultant, where applicable) to identify and provide options that are cost-effective.

2. In your opinion, at what point in the microgeneration connection process should a customer be informed of the potential to be charged for extraordinary costs?

Please refer to the response to Question 1 regarding cost estimates above.

Technical Standards

1. Do technical standards associated with a microgeneration unit connection typically change over the connection process? If so, please describe the circumstances.

Technical standards do not change frequently; however, they may evolve over time in response to industry, regulatory, or safety requirements. ATCO will comply with any applicable changes to technical standards as they occur.

Where flexibility is available and such an approach is consistent with regulatory and technical requirements, ATCO will generally seek to apply the standards in effect at the time an application is submitted in order to provide greater certainty and predictability for customers. However, circumstances may arise where compliance with updated standards is required prior to project completion or commissioning.

a. What information could be provided, by distribution facility owners, customers, or both, that might reduce the likelihood or frequency of technical standards changing partway through the connection process?

ATCO provides its technical documents on its website and updates the document(s) periodically. As standards evolve for MGs, similar to other generators, customers must continue to comply even after MG approval and installation. This is particularly true in cases where standards change due to safety or reliability concerns.

Communication

1. Please briefly describe your experience with communication between distribution facility owners, customers, and any other participants during the microgeneration unit connection process.

ATCO views that experiences with customers are mostly positive. As noted throughout, ATCO is customer-centric and works closely with customers and consultants to provide a positive experience. Communication takes place as needed during the MG Application Review Process and, post approval, during the MG Connection Process. Customers also have the option to call the contact centre to request a project status update.

At the beginning of each year (2025, 2026) ATCO proactively engaged with consultants to learn about their business plans for the year to help it resource accordingly. If required, ATCO also facilitates meetings and phone calls with customers and consultants for more complex MG Applications to ensure alignment on all sides.

2. How often **do** distribution facility owners provide updates to customers on the status of their proposed microgeneration projects? Please comment on any differences between small and large microgeneration generating units.

Status updates vary depending on the complexity and uniqueness of each MG application. ATCO does not have a standard or minimal communication standard beyond the initial application receipt notice. Rather, it is customized based on the situation and customer desires. Typically, updates are provided when either the DFO or the customer has questions or a change in information, or there is a change in status in the application process.

For example, even for a simple small MG, if an application is submitted that is complete and eligible, ATCO would provide the customer with an approval email with next steps, and the customer would proceed to the connection process which would include another touchpoint to get an Interconnection Operating Agreement (IOA) executed. Once ready for commissioning, the customer would engage ATCO and schedule a commissioning time.

Conversely, if there is missing information in an application and/or there are questions on the submitted information, there could be several touchpoints between ATCO and the customer to complete the application and clarify any outstanding issues before eligibility is approved. Again, if there are any delays in getting the required IOA signed, or the appropriate commissioning documents, there could be several touchpoints in the connection and commissioning process.

3. In your opinion, how often should distribution facility owners provide updates to customers on the status of their proposed microgeneration projects? Please consider one or more of the below options, provide justification, and comment on any differences between small and large microgeneration generating units.

Updates are provided on an as-needed basis and should be customized based on the uniqueness of the application circumstances.

a. Every 14 days

Please refer to the response to Question 3 above.

b. When the project enters a new phase

Please refer to the response to Question 3 above.

c. When the distribution facility owner receives new information that may necessitate changes to the microgeneration project's specifications

Please refer to the response to Question 3 above.

d. When information is about to become outdated due to lack of customer response

Please refer to the response to Question 3 above. If the customer does not provide timely replies, or information becomes outdated, then they may need to restart the application process.

e. Other

3. In your opinion, what are the most effective methods for distribution facility owners and

None. Please refer to the response to Question 3 above.

customers to exchange necessary information in a timely fashion? In considering the below options, please take into account the required resources (time, staffing, or other).

ATCO Electric uses a variety of communication methods, including direct email and phone calls, but notes that the exchange of information in a timely fashion is dependent on the applicant responding to requests for information. DFOs should have flexibility on how to communicate effectively with customers as each customer may want different approaches.

a. Direct emails/phone calls

Please refer to response to Question 3 directly above.

b. In-person or virtual meetings

Please refer to response to Question 3 directly above.

c. Updates to distribution facility owners' websites as soon as relevant new general or system-wide information is known

Please refer to response to Question 3 directly above.

d. General communication in a centralized hub, such as the AUC's website

Please refer to the response to Question 3 directly above.

ATCO notes a general communication hub already exists through AUC Rule 024, and the guidelines are sufficient because they refer to DFO technical requirements. In regard to customer touchpoints and relationships, a central hub beyond informative information may reduce customer experience. As noted herein, ATCO meets with customers or their consultants to align information.

e. Other

N/A

4. In your opinion, what changes to existing communication processes between microgeneration parties would lead to better outcomes, such as minimizing delays in the connection process?

As noted in response to Question 1 in the Timelines section, having complete information provided by the customer initially at the time of filing the MG application, and not oversizing the micro-generator, will minimize delays.

5. Please briefly describe your experience with microgeneration applications where the proposed size must be reduced for legislative, technical, safety, or other reasons. How has this been communicated?

ATCO informs customers via email, phone or in some circumstances meeting with its technical employees.

a. When the rationale for such reductions is communicated, what options for proceeding with the microgeneration project are generally provided to customers?

ATCO recommends bringing the MG application into compliance to continue with the process so they can connect. ATCO works with customers and provides various solutions that balance the customer desire to connect with safety of the system.

6. **[Distribution facility owners only]** What is your rationale or threshold for when to provide updates to customers on the status of their microgeneration projects? Please explain with reference to the factors and circumstances that may be considered.

Please refer to the responses to Questions 2 and 3 directly above.

a. Is providing customers with more frequent status updates a feasible and helpful option in general? Please explain, including any different considerations for small and large microgeneration projects.

Please refer to the response to Question 2 above.

General

1. **[Customers only]** Has any salesperson or company attempted to sell you or a member of your household a solar microgeneration system, especially door-to-door? If yes, please briefly describe your experience.

N/A

2. **[Distribution facility owners only]** Do you have the necessary information and tools to (a) monitor and (b) manage existing microgeneration generating units that may be out of compliance with the Micro-generation Regulation (likely due to consistent generation in excess of annual consumption)? If not, please explain what you would require to do so.

No. ATCO notes there are no requirement or tools to monitor or enforce Micro-generating units that are generating in excess of annual consumption under the *Micro-Generation Regulation* or AUC Rule 024.

3. If there is any other microgeneration-related information that you feel is important for the AUC to know, please briefly describe it here.

ATCO is committed to working with customers to review their MG applications and getting Micro-generators connected with a customer-centric approach. One of ATCO's biggest challenges is receiving complete and fulsome initial applications. ATCO believes today that there are numerous resources and guidelines that assist customers to meet the requirements; however, the issue persists. Given the foregoing, as discussed in response to Question 1 in Timelines, the AUC should consider requiring a nominal administration fee as a price signal to customers to encourage additional review of applications prior to filing with the DFOs.