AUC
Alberta Utilities Commission

Rule 024 engagement questionnaire

Comments from *(company/stakeholder name)*:	ENMAX Power Corporation	**Contact name *(for companies)*:**	Andrew Davison
		Phone:	Click or tap here to enter text.
Date [yyyy/mm/dd]:	September 8, 2026	**Email**:	[redacted]
Role:	Manager, Regulatory, ENMAX Corporation		

Instructions

1. Please download this document, save as "**Rule 024 questionnaire**" and fill out the demographic/contact information above.

2. Please review Bulletin 2026-10.

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.

   There are multiple timelines as part of the micro-generation application process: i) the timelines for reviewing an application for completeness, ii) the 14-day timeline from a completed application to ENMAX Power Corporation's (EPC's) decision to approve or dispute the application, and iii) if approved, the timeline between approval and connection.

   In general, deeming an application as complete depends on many different factors (further described throughout our submission). Additionally, connection timelines are heavily dependent on installers and the complexity of interconnection. For more explanation of site-specific construction, please see ENMAX Power's responses to the Stakeholder Comments on the AUC's proposed changes to Rule 024 submitted in conjunction with this questionnaire.

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

   Review timelines vary based on application completeness, and connection timelines can be impacted by response times from applicants or installers, tasks to be performed by the micro-generation installers, and technical complexity of interconnection work.

   Additionally, applications that appear to have large fluctuations in energy consumption or perceived oversized generation will warrant further studies to determine if qualification requirements within the regulation are being met, which can add to timelines.

   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:

      There are several resources available, including but not limited to:

      i. ENMAX Power's:

         - Distributed Energy Resource Technical Interconnection Requirements (available online here Standards and regulations)
         - Metering Standard (available online here Standards and regulations)
         - Generator Interconnection Applications (available online here Generator interconnection application)

      ii. The AUC's Microgeneration information (available online here Micro-generation - AUC)

iii. Canadian Electrical Code Section 64

iv. Canadian Standards Association (CSA) C22.3 No. 9 Interconnection of Distributed Energy Resources and Electricity Supply Systems

ENMAX Power supports industry-wide discussion and alignment on what additional resources may be beneficial for developers and customers to ensure there is a consistent understanding of the requirements for micro-generation projects looking to connect to our distribution system and ways to improve existing resources. For example, industry could benefit from the AUC including decisions related to micro-generation on the microgeneration portion of its website (see the AUC's website section Micro-generation - AUC).

As explained in ENMAX's response to Bulletin 2025-05, industry-wide consultation on guidelines and interpretation about what constitutes "permanent load" (including related documentation), the "self-supply" requirement in the *Micro-Generation Regulation* (including historical consumption and forecast generation, and the sizing of the microgeneration generating unit), and the impact of inverter sizing on hosting capacity, grid operations and extraordinary costs would benefit the industry and help reduce delays.

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

See responses above. ENMAX Power supports general phases during the connection process. However, as explained in our responses to the Stakeholder Comments on the AUC's proposed changes to Rule 024 submitted in conjunction with this questionnaire, ENMAX Power does not support prescribed minimum timelines for connection projects in complex urban environments. The scope, complexity, and costs associated with individual connection requests, especially within an urban environment, can vary significantly depending on factors such as the completeness of the application, technical requirements, the need for engineering studies, and the responsiveness of both the customer and the customer's installer. As a result, establishing minimum timelines would not appropriately reflect the variability inherent in the connection process.

Generally, smaller projects are less impactful and, if the right framework is implemented (see response a) above), can be standardized. Conversely, larger projects require more detailed technical reviews and potentially more work to connect, with standardization less effective. Further complicating the larger projects, the technical specifications of a micro-generation generating unit and interconnection may impact how the unit is connected. Long-lead times associated with the equipment for a larger unit may mean that at the time of their application, the customer may not have purchased the equipment yet and can only provide basic details of the unit, not the specifics. This makes it difficult for ENMAX Power to assess the interconnection costs, as system studies may be impacted by different equipment choices such as synchronous generating units with switchgear or protection/transfer trip communications.

vi. 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).

Common delays include missing required documents from the customer, incomplete equipment details, inaccurate production estimates, perceived oversized designs (microgenerating unit or inverter or both), unresolved technical questions, and delayed applicant responses

vii. Other (please explain).

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:

See responses above. Reasonable calculations of total annual energy consumption, designs reflective of actual production and complete applications (reflective of regulation and DFO requirements) would help projects move along the review timelines more smoothly. As noted in the response to 2(b)(iii), there would be value in establishing standardized methodologies and/or minimum information requirements to help ensure a reliable and consistent approach.

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

Detailed inverter, module, battery, protection, control, export-limiting, and single-line diagram information should be provided at initial submission. As well the documents associated with newly installed electrical equipment must show that it is owned and installed onsite. Accurate documents for newly installed electrical load, including any related permits or licenses to support the permanent nature of the load.

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.

See response to 2.b.iii.

iii. Other (please explain).

There is value in establishing a standardized methodology and/or minimum information requirements for utilities to calculate the estimated annual consumption at a customer's existing or new site, including the micro-generation unit's output, as well as establishing required documentation for planned future upgrades. ENMAX welcomes further industry discussion on this.

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.

See response to 2.b.iii. Most small micro-generation applications that are delayed are due to perceived oversized applications and under reported production.

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.

   Click or tap here to enter text.

   a. Legislative requirements applying to microgeneration in Alberta.

      Click or tap here to enter text.

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

      Click or tap here to enter text.

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

      Click or tap here to enter text.

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

   2023 – 23 applications

   2024 – 15 applications

   2025 – 15 applications

   2026 – 9 applications thus far

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.)?

   ENMAX Power is not aware of any large microgeneration projects cancelled in our service area after their application was approved. While there have been no projects cancelled, it is important to vet microgeneration generating unit applications during the application process to ensure they will

comply with the *Micro-Generation Regulation*. There is no compliance framework for microgeneration projects (including monitoring and enforcement, or by whom), so once a microgeneration generating unit is connected, ENMAX Power has little recourse unless system safety and reliability are compromised.

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.)?

Not applicable. See response to question 6.

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.

Not applicable. See response to question 6.

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.

See response to question 6.

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?

See response to question 6.

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

Some of the larger microgeneration proponents seem aware of the *Small-Scale Generation Regulation*, but it is unclear to ENMAX Power if smaller proponents, for example residential solar, are aware.

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

No. ENMAX Power understands the primary purpose of a micro-generator is to generate electricity for the customer's own use (self-supply). In contrast, small scale generation is intended primarily for exporting electricity to the grid and is subject to additional requirements. For example, there is a requirement to demonstrate certain social, environmental or economic benefits for community generators.

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

Yes.

Cost estimates

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

   Yes. As more details are determined the costs of the project change and become more refined. For more information about how costs evolve through the connection process, please see ENMAX Power's responses to the Stakeholder Comments on the AUC's proposed changes to Rule 024 submitted in conjunction with this questionnaire.

   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?

      For more explanation of connection costs and estimating costs in ENMAX Power's responses to the Stakeholder Comments on the AUC's proposed changes to Rule 024 submitted in conjunction with this questionnaire.

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 see ENMAX Power's response to the Stakeholder Comments for an explanation of ENMAX Power's current stages of consulting with the customer applying for a microgeneration connection.

Technical standards

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

   No. ENMAX Power honours publicly available technical standards at the time of the application. See response to Questions 2 a) above for a list of those standards. These standards continue to be reviewed and evolve, and ENMAX Power retains the ability to revoke service or update the specific applicable requirement(s) if system safety and reliability will be compromised by a connection request.

   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?

      N/A

Communication

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

   ENMAX Power views the micro-generation review and connection process as iterative, and we make reasonable efforts to work collaboratively with micro-generation applicants to ensure that all required information is received by us before we move forward with approving (or disputing, where applicable).

   That said, timelines need to remain flexible due to the variability of applications and there are improvements that can be made industry wide to help further streamline information requirements upfront.

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.

   Small micro-generation projects typically do not require regular updates. Updates are generally provided at key milestones or when additional information is needed. Large projects, however, often require more individualized communication due to their greater technical complexity.

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.

   Status updates should be tied to meaningful milestones, information requests, material changes, or approaching expiry dates rather than provided on a fixed schedule where there is no substantive change.

   a. Every 14 days

      Every 14 days may be appropriate where required by process timelines or where there is activity to review. For inactive files, fixed interval updates may create unnecessary administrative burden. For large microgeneration applications, every 14 days is likely too frequent as there may not be any new information.

   b. When the project enters a new phase

      See response to Question 3.

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

This would be relayed to the installer as soon as possible.

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

This would be relayed to the installer as soon as possible.

e. Other

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

Email is the preferred method of communication, as it leaves a traceable record of communication and it facilitates document sharing.

a. Direct emails/phone calls

See above answer. Phone calls can be useful for clarification but should be followed by written confirmation.

b. In-person or virtual meetings

Meetings are helpful for complex or large projects but are generally not required for standard small micro-generation applications. In addition, meeting minutes would likely have to be circulated and validated, which is typically done via email.

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

Website updates are useful for general process information, forms, standards, and system-wide changes, but are not a substitute for project-specific communication.

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

ENMAX welcomes the opportunity to discuss what additional material may be useful to have available on the AUC's website, that could complement existing resources such as AUC Rule 024 and the Micro-Generation Submission Guidelines.

e. Other

Automated intake systems and customer management systems could be effective for customers and DFO's for managing the communication, including standardizing and/or automating where possible (i.e. "simple" interconnection requests). However, there are

costs associated with developing and managing such systems, and it is unclear who would bear these costs. ENMAX Power has not researched or scoped such systems.

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?

   See response to questions 1 and 2 under the "Timelines" section which describe the source of typical delays. Improving the clarity of MG requirements (developing industry standard definitions or scope for many aspects of an MG) would address many of the sources of typical delays to support better outcomes.

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?

   This occurs most often where proposed generation exceeds annual consumption, equipment ratings are inconsistent with the application, or interconnection technical constraints require revised design. The rationale is typically communicated in writing with the required correction.

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

      Customers are generally asked to revise the proposed size, provide additional justification, add or confirm export limiting, or submit updated technical documentation for review.

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.

   Updates are typically provided when there is a material status change, missing information, a technical issue, a required customer action, or a timeline-sensitive item that may affect the project.

   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.

      See response to questions 1 and 2 under the "Communication" section, and ENMAX Power's responses to the Stakeholder Comments on the AUC's proposed changes to Rule 024 submitted in conjunction with this questionnaire. Manual updates for every application would be resource-intensive, especially where no substantive status change has occurred.

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.

Click or tap here to enter text.

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.

   Further to the response to question 6 under the "Timelines" section, at a high level, no, ENMAX Power does not have the necessary information and tools to monitor and manage existing micro-generation units that may be out of compliance with the *Micro-Generation Regulation*. ENMAX Power views the lack of a compliance (monitoring and enforcement) framework as a gap in the regulation and related rules, which was explained in ENMAX Power's response to AUC Bulletin 2025-05.

   At a high level, any contemplation of a future framework would require further industry discussion to consider roles and responsibilities, additional systems and processes that may be needed and clarity on cost recovery.

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

   Just as the transmission system cannot accept unlimited generation without risking congestion and curtailment, the distribution system cannot accommodate unlimited load or generation without regard for its physical and operational limits. The ability for the DFO to evaluate, condition, defer or reject microgeneration generating unit applications in exceptional circumstances is a necessary tool. This is one of the only tools the DFO's can use for i) preserving system reliability and protecting existing customers from the consequences of over-utilizing finite grid capacity and ii) protecting hosting capacity from oversizing microgeneration generating units.

   As indicated in past AUC consultations on micro-generation, AUC Rule 024 issues are intertwined with several other important topics including the treatment of excess generation, seasonal solar retail offerings, and future required changes to other AUC Rules to accommodate expected developments to settlement and metering.

   Specifically, ENMAX's submission in response to Bulletin 2025-05 identified several areas of the micro-generation framework that required clarification. These include, but are not limited to: microgenerator sizing (how to determine historical annual consumption, standardized methods for forecasting production, and interpretation of annual production); stacking ratio (inverter in relation to the microgenerator); a framework for monitoring compliance for approved microgenerator applications; enforcement of non-compliance; treatment of excess generation; and the incentives created by seasonal solar offerings. Those areas identified in ENMAX's response to Bulletin 2025-05 are in addition to the areas identified in this consultation, which include, among others: how to define and quantify extraordinary costs; application timelines; differences between rural and urban

environments when considering costs and timelines; and impacts of extraordinary costs on distribution tariffs.

An AUC-led working group with industry participants, which could involve government representatives, would be a good first step in establishing a common understanding of stakeholder views and emerging issues related to micro-generation and interrelated topics. This would also help identify existing challenges and opportunities for improvements, and how best to address these, either through amendments to the existing *Micro-Generation Regulation*, AUC rules and/or other government policy.