AUC
Alberta Utilities Commission

Rule 024 engagement questionnaire

Comments from *(company/stakeholder name)*:	FortisAlberta Inc.	**Contact name (*for companies*):**	Elizabeth von Engelbrechten
Date [yyyy/mm/dd]:	2026/10/01	**Phone:**	[redacted]
Role:	Senior Manager, Legal Counse	**Email**:	[redacted]

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.

For small MGs, the average connection times in 2023, 2024 and 2025 were 107 days, 106 days, and 90 days, respectively.

For large MGs, the average connection times in 2023, 2024 and 2025 were 610 days, 482 days, and 613 days, respectively.

Interconnection timelines for large MG projects are typically longer than for small MG projects because large MG facilities represent more complex and significant interconnections with the distribution system. For example, complexities for large MG projects result from the greater magnitude of generation being interconnected, potential reverse power flow, available feeder/substation capacity, protection and control requirements, and possible transmission system impacts. Unlike small MG projects, large MG projects often require more extensive technical engineering studies and adherence to engineering and design standards to identify and mitigate potential negative impacts resulting from the reverse power flow on the system.

FortisAlberta attributes extended timelines primarily to customer-driven factors. In some cases, applications are submitted with incomplete or incorrect technical information, requiring follow-up and clarification before the assessment can proceed. Timelines are also frequently extended where a customer changes the project scope, equipment, or design after the application has been submitted, requiring some or all of the assessment to be revisited.

Longer timelines may also occur when complex engineering and system impact studies are required, particularly when coordination with transmission facility owners is needed or when local distribution or transmission capacity is constrained. Saturation levels on the system can change over time due to new generation and new or reduced load, requiring capacity to be reassessed during the application process.

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

Yes, as noted above, FortisAlberta often experiences delays in the MG connection process due to incorrect or incomplete application submissions. One of the most common misunderstandings among MG proponents, which delays the application and connection process, is the definition of MG, particularly the requirement for the MG generating unit to meet all or a portion of the customer's total annual energy consumption. Customers and consultants often submit applications where the MG

generating unit is oversized relative to the customer's total annual energy consumption. Other common mistakes that the Company sees on application forms are: (i) incorrect customer name, (ii) missing site IDs, (iii) customer name and/or additional information missing from the single-line diagram, and (iv) missing information on the third-party authorization form.

FortisAlberta also experiences MG proponent errors regarding FortisAlberta's applicable interconnection standards, which standards are in place to ensure the system can be operated safely and reliably. Delays are often caused by applicants not fully understanding or correctly applying current interconnection requirements, including IEEE 1547-2018, DER-01 and DER-02 standards, and the applicable interconnection assessment processes. In some cases, applicants do not retain consultants or engineers with the appropriate expertise for the complexity of the proposed interconnection, resulting in incomplete or incorrect designs that require significant revisions. Applicants may also purchase equipment before the Detailed-Level Study (DLS) and interconnection review processes are complete, only to discover that the equipment is not certified or does not meet current requirements, leading to redesigns, replacement costs, additional testing, and further schedule impacts.

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:

FortisAlberta is of the view that it generally provides sufficient information at the outset of a MG project to support project planning and application preparation. The information currently provided regarding technical requirements, application processes, interconnection standards, and project expectations is typically adequate for proponents to proceed efficiently. Delays are more often attributable to project-specific factors, such as incomplete applications or customer-driven decisions, rather than a lack of information from distribution facility owners (DFOs).

Accordingly, the Company does not believe there is additional information that DFOs could reasonably provide before the start of a MG project that would materially reduce project delays. Continued use of existing guidance materials and clear communication channels remains effective in supporting timely project development.

FortisAlberta's comments on each of the suggestions are provided below.

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

It is FortisAlberta's view that the Company has provided sufficient information about phases of the connection process.

FortisAlberta's external website provides an Interconnection Request Process document that outlines the phases of the connection process for small MG projects: FortisAlberta Small MG Interconnection Process The Company does not provide associated timelines in this document as the timelines are largely dependent on the MG proponent or its consultant providing correct and complete information to FortisAlberta.

With respect to large MG projects, the Company conducts meetings with the customers and/or their consultants following completion of a detailed-level study (DLS). During these meetings, FortisAlberta provides an overview of the connection process and outlines the key steps required to advance the project. The Company also provides the customers and/or their consultants with a Gantt chart detailing the process timelines, FortisAlberta's Interconnection Guide, and a high-level process overview. To further enhance transparency and accessibility, the Company is also in the process of making these materials available on its website so that MG proponents can familiarize themselves with the large MG connection process prior to submitting an application.

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

No, additional information regarding the different timelines, phases and requirements for small and large MG projects would not be helpful in reducing delays. MG project proponents generally determine whether to pursue a small or large MG project based on their electricity load requirements, project economics, and other commercial considerations, rather than differences in connection timelines, project phases, or related connection process requirements. As such, further comparison of these factors is unlikely to meaningfully impact a proponent's sizing decision.

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).

While FortisAlberta is generally of the view that it provides sufficient information for MG project proponents to submit a fulsome MG application, the Company would be open to exploring the provision of additional information to small MG proponents regarding common circumstances that may lead to delays in the connection process or require phases to be revisited, including situations where customers or MG proponents do not respond promptly to requests for information. Such information could help set expectations and improve proponents' understanding of the process.

However, the Company does not believe that providing this information would fully resolve connection delays, as connection timelines can be influenced by a

range of project-specific factors, many of which are outside of the DFO's control or vary significantly between projects. As a result, while additional guidance may improve transparency and awareness, it is unlikely to eliminate delays or prevent all instances where project phases need to be revisited.

With respect to large MG projects, the Company holds an initial meeting with the customer and/or its consultant. At this meeting, FortisAlberta explains the common scenarios that may cause delays in the connection process, such as missing information in the proponent's application, congestion on the applicable feeder, and the potential requirement for an AltaLink study.

iv. Other (please explain).

FortisAlberta is of the view that a better understanding of technical requirements would facilitate a more efficient and timelier interconnection process for MG proponents and the Company is committed to efforts to provide MG proponents with such. For example, the Company has held the following documented industry engagement sessions specifically covering distributed energy resource (DER) technical requirements and upcoming standard changes:

- November 14, 2023: In-person session with solar industry consultants covering current notable requirements, including measurement point obligations for sites 250 kW and greater, single line diagram requirements, Category II inverter profiles, and future requirements including commissioning sign-offs, inverter settings submission, and Volt-VAr/Volt-Watt control modes.

- March 19, 2024: Follow-up in-person session covering takeaways from the November session, current activities including AUC engagement for process improvements, and future considerations including advanced control modes and data connectivity.

- June 25, 2025: In-person session with approximately 60 solar industry consultants covering large MG timelines, DER standards changes, ICAP, and upcoming control mode and EMT modelling changes with an explicit invitation for industry feedback.

- November 5, 2025: Public stakeholder webinar on upcoming DER integration standards and operational impacts, followed by DER Bulletins 2025-002 and 2025-003 (November 19, 2025), a structured feedback period closing December 19, 2025, and published written responses to proponent questions in DER Bulletin 2026-001 (February 2026).

- July 28, 2026: In-person session, announced in DER Bulletin 2026-003, covering updated DER technical requirements, implementation

considerations and feedback from industry stakeholders on the draft requirements.

FortisAlberta is also exploring the development and delivery of a pilot one-day educational course that would explain the Company's technical requirements and processes for connecting MG facilities to its distribution system, with the aim of increasing efficiency.

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:

Yes. Additional information provided at the initial application stage could help reduce delays, particularly where it improves the completeness and accuracy of the application package. For example, delays may be reduced if proponents provide complete technical documentation, accurate site and equipment information, finalized system designs, and all required supporting materials at the outset.

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

Yes. More accurate and detailed information about the technical specifications of a proposed MG project could help reduce connection delays. Providing complete and accurate information regarding the generating equipment, inverter specifications, system capacity, site layout, single-line diagrams, and other technical requirements at the outset can reduce the need for follow-up questions, clarification requests, and resubmissions during the review process.

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.

In FortisAlberta’s experience, delays arising from a disconnect between a MG project's proposed size and the customer's annual energy consumption are generally not caused solely by a lack of supporting documentation. Rather, they more commonly arise because the customer or MG consultant has not properly accounted for the sizing requirements under the *Micro-generation Regulation*, including the requirement that an MG system be sized to meet all or a portion of the customer's own electricity needs.

For example, FortisAlberta has observed that proponents of combined heat and power (CHP) MG generating units frequently assume that the CHP unit will operate continuously throughout the year. A continuous operating schedule, equivalent to 8,760 operating hours annually, does not always align with the

customer's annual electricity consumption and may result in projected annual generation exceeding the customer's electricity requirements.

FortisAlberta applies a standard assumption that CHP units operate continuously, equivalent to 8,760 hours per year. A proponent may propose an alternative duty cycle where supported by the circumstances of the project. The duty cycle is the proportion of time the generating unit is expected to operate and produce electricity over a given period. However, where a proponent relies on an alternative duty cycle, FortisAlberta expects documentation, stamped by a professional engineer, substantiating the proposed operating hours and explaining the basis for the alternative operating schedule. In FortisAlberta's experience, proponents frequently do not provide this documentation. As a result, FortisAlberta is often required to assess the project based on the continuous-operation assumption, which can demonstrate that the proposed annual generation exceeds the customer's annual consumption.

While supporting documentation assists FortisAlberta in evaluating a proposed project, the underlying issue in these cases is often not solely the absence of information but that the proposed annual generation exceeds the customer's demonstrated or reasonably anticipated electricity requirements. Additional justification alone will not resolve that concern where the project, based on its expected operating characteristics and generation profile, is fundamentally oversized relative to the customer's electricity needs. In FortisAlberta's view, a better understanding of the applicable sizing requirements by customers and MG consultants would be more effective in reducing such delays than requiring additional supporting information alone.

iii. Other (please explain).

No further comments.

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.

As noted above, the definition of MG, particularly the requirement for the MG generating unit to meet all or a portion of the customer's total annual energy consumption is a common source of delay. FortisAlberta is often required to educate customers on the requirement in the regulation and provide further explanation on how it determines a customer's total annual energy consumption.

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?

Year	Large MG Applications Received
2023	24
2024	21
2025	16
2026 (to date)	3

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.)?

Year	Large MG Cancellations
2023	11
2024	8
2025	3
2026 (to date)	0

For large MG projects, applications may be cancelled for a variety of reasons. In some cases, the customer initiates a change to the project scope and submits a new

application to reflect the revised project. Applications may also be cancelled when the customer does not respond to requests for information, clarification, or action from FortisAlberta within the required timeframe. In other instances, no specific reason for the cancellation is provided by the customer or otherwise documented.

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.)?

In FortisAlberta's experience, large MG projects are typically cancelled after the DLS is complete.

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.

In FortisAlberta's experience, large MG projects are more likely to be cancelled than small MG projects. From 2023 to present, approximately 34% of large MG projects were cancelled as compared to approximately 11% of small MG projects.

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.

The Company has not observed that cancellations are more prevalent among any particular fuel type or geographic area. Rather, the likelihood of project cancellation appears to be more closely related to the project proponent's familiarity with, and understanding of, the technical, operational, and regulatory requirements associated with large MG projects.

In the Company's experience, projects proposed by less sophisticated customers or developers may be more likely to be cancelled as proponents gain a clearer understanding of the technical requirements, system impacts, and other obligations that must be addressed to successfully connect a large MG facility. As these requirements become better understood throughout the application and study process, some proponents may determine that the project is no longer feasible or aligned with their objectives.

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?

Based on FortisAlberta's experience with cancelled large MG projects, a greater understanding of the technical requirements associated with interconnecting a large MG facility would likely help reduce the number of project cancellations. In many instances, proponents may not fully appreciate the technical, operational, and interconnection requirements at the time an application is submitted, and a clearer understanding of these requirements earlier in the process may assist proponents in better assessing project feasibility.

The Company currently makes its technical requirements available on its website. To further support customers and MG consultants, FortisAlberta is in the process of enhancing its website by providing additional resources, including its Interconnection Guide, a high-level process snapshot, and a Gantt chart outlining the key steps and timelines associated with the large MG connection process. These materials are intended to improve transparency, set expectations early, and help proponents make more informed decisions prior to submitting an application.

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

FortisAlberta cannot comment on the general level of awareness among MG market participants regarding the *Small Scale Generation Regulation.*

However, based on the Company's experience, customers have typically already determined which regulatory framework they intend to pursue before engaging with FortisAlberta. The Company does not generally receive inquiries from customers seeking guidance on the differences between applicable regulations or requesting recommendations on which regulation to follow. As a result, FortisAlberta has limited visibility into customers' awareness or understanding of the *Small Scale Generation Regulation* beyond the regulatory choice they have already made when initiating discussions with the Company.

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

No. While greater awareness of the *Small Scale Generation Regulation* may help customers understand the range of available regulatory frameworks, it is unlikely to materially reduce the volume of MG applications because the two regimes provide fundamentally different economic incentives.

The *Micro-generation Regulation* is designed to allow customers to generate electricity primarily to offset their own consumption. The compensation mechanism differs based on project size: small MG customers are compensated for exported energy at the applicable retail energy rate through their retailer, whereas large MG customers are compensated based on the hourly pool price for electricity exported to the grid. As a result, small MG customers are able to realize value through avoided retail electricity purchases, with excess generation credited or compensated through their retailer. By contrast, the *Small Scale Generation Regulation* is geared toward electricity market participation, with generators selling electricity into Alberta's wholesale market as qualified small-scale power producers. Compensation is therefore based on the hourly pool price rather than avoided retail consumption.

Because retail electricity values are typically higher than wholesale market prices, many small MG customers will continue to prefer the MG model where they have sufficient on-site load to offset. In other words, the decision to pursue MG is often driven by economics rather than a lack of awareness of alternative regulatory frameworks. Even where customers are aware of the *Small Scale Generation Regulation*, they may reasonably conclude that the greater value lies in reducing retail electricity costs rather than selling electricity into the wholesale market.

Accordingly, increased awareness of the *Small Scale Generation Regulation* would likely have only a limited effect on MG application volumes. Customers whose primary objective is to reduce electricity costs will generally remain incentivized to pursue MG, while the *Small Scale Generation Regulation* is more likely to attract proponents seeking to develop generation projects for market-based revenue rather than load offset.

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

Yes, FortisAlberta has connected customers as small scale or community generators under the *Small Scale Generation Regulation.*

Cost estimates

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

Typically, cost estimates for a MG project connection do not change over the connection process. For example, between 2023 and 2026, FortisAlberta only requoted one large MG project in 2024 due to an error in accounting for engineering time during

the DLS. FortisAlberta corrected the quote record, and no costs were allocated to the customer as owing in either quote issued.

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?

Not applicable. As noted above, FortisAlberta does not typically revise cost estimates during the connection process.

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?

Customers should be informed about the potential for extraordinary costs as early as possible in the MG connection process. While FortisAlberta would endeavor to inform a customer as early as possible, these costs would typically not be known until later in the process, following the required technical reviews.

The Company is committed to providing information and guidance regarding MG connections, but it is also FortisAlberta's view that MG consultants play a key role in educating customers about the requirements of the *Micro-Generation Regulation*, including the potential for extraordinary costs that may be incurred in connection with a proposed project.

Technical standards

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

Typically, technical standards associated with a MG unit connection do not change in a way that would have a material impact on the connection process once an application is underway. During the 2024 to 2025 period, the Company issued several revisions to its DER interconnection standard (DER-02). The standard was revised from Rev 4.2 (March 2023) through Rev 5.0 (December 2023), Rev 5.1 (February 2024), Rev 5.2, Rev 5.3, Rev 6.0 (January 2025), and Rev 6.1 (April 2025). Most of these changes were clarifications that did not materially impact applications already in process. These types of changes do not require industry consultation as they impose no new material technical burden on applicants. In the limited cases where standard changes did have a material impact, those changes were driven by factors outside the MG customers' and sometimes FortisAlberta's control, including evolving understanding of inverter-based resource behaviour, new research findings, technology developments, and changes in industrial practice. Technical standards governing DER interconnection are subject to continuous evolution as the industry matures; this is reflected in successive revisions to the Institute of Electrical and Electronics Engineers (IEEE) 1547-2018 guidance

documents and Electric Power Research Institute (EPRI) research, and FortisAlberta's standards are updated accordingly.

FortisAlberta implements these updates to (a) provide safe, reliable, and economic delivery of electricity to its customers and (b) operate the system in a safe and reliable manner, in accordance with the Company's duties under Section 105(1) of the Electric Utilities Act. When new information or industry guidance identifies risks or gaps in existing standards, FortisAlberta updates its requirements accordingly. As a result, schedule or cost impacts may arise where proponents proceed with construction of their own facilities prior to completing the interconnection process and receiving the Company's technical feedback; such risks rest with the proponent.

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?

Additional information provided by DFOs, customers, or both would not be expected to materially reduce the likelihood or frequency of technical standards changing partway through the connection process.

Changes to technical standards are generally not driven by a lack of information from the customer or the DFO. Rather, they are typically driven by the need to ensure the continued safe, reliable, and economic operation of the electricity system, as well as compliance with evolving industry standards, regulatory requirements, and third-party requirements. These considerations can arise independently of the information exchanged during a particular connection application.

Accordingly, although improved information sharing may help streamline the review of individual applications, it is unlikely to reduce the frequency with which technical standards change during the connection process. The most effective way to minimize impacts on customers is not through additional information requirements, but through clear communication of any proposed standards changes, which FortisAlberta endeavors to provide.

If this question concerns the application of technical standards changing partway through the connection process, such changes may be mitigated where customers provide finalized project designs and avoid material modifications during the review process. Further, the timely submission of complete technical information enables the applicable technical standards to be accurately identified and applied at the outset, reducing the potential for revisions during the interconnection process.

Communication

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

> FortisAlberta views its communication during the MG connection process as effective. The Company maintains regular and timely communication with consultants, customers and other relevant participants throughout the connection process. This includes providing information regarding application requirements, technical reviews, connection timelines, and any necessary system modifications or approvals.

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.

> For small MG projects, FortisAlberta provides customers with updates throughout the connection process. Upon receipt of a small MG application, the Company issues an automated confirmation email acknowledging that the application has been received. As the application progresses, FortisAlberta provides additional automated email notifications at key stages of the connection process to keep customers informed of project status and next steps.
>
> Where application materials are incomplete or require clarification, the Company communicates directly with the customer to identify and resolve any outstanding issues. In addition, telephone or virtual meetings may be arranged when further discussion is required, including to address technical requirements, project-specific considerations, or requests for additional information. This approach helps ensure clear, timely, and transparent communication throughout the connection process.
>
> For large MG projects, FortisAlberta conducts an initial meeting, following the completion of the DLS, with the customer and/or its consultant to discuss the project scope, connection requirements, and overall process. Following this initial meeting, the Company typically holds regular status meetings with the customer and/or its consultant on a biweekly basis, or more frequently as required. The frequency of these meetings may be adjusted at the request of the customer or consultant to align with project needs and timelines.
>
> Prior to completion of the DLS, there are often limited project updates available, as the study is required to assess system impacts and determine connection requirements. Nonetheless, FortisAlberta remains available to respond to customer and consultant inquiries throughout this period and provides information as it becomes available. In addition to regularly scheduled meetings, the Company addresses ad hoc requests and communications from customers and consultants to support timely issue resolution and facilitate efficient project progression.

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.

The Company views its current communication practices for MG connection applications as appropriate and effective. The frequency of communications should be tailored to the nature and complexity of the project, rather than prescribed through mandatory update intervals.

For small MG projects, the Company's existing process of providing automated notifications at key milestones in the application and connection process ensures that customers receive timely and meaningful updates when project status changes or action is required. Providing additional updates on fixed timelines, particularly during periods when no substantive progress has occurred, would offer limited value to customers while increasing administrative requirements.

For large MG projects, the Company currently maintains regular communication with customers and their consultants through scheduled meetings and direct correspondence at key stages of the project. Following completion of the DLS, regular status meetings are typically held to discuss project progress, outstanding issues, and next steps. The frequency of these meetings may be adjusted based on project needs and customer preferences. Prior to completion of the DLS, there are often limited updates available, as technical assessments must be completed before connection requirements can be determined.

Further, if the Commission were to mandate communications at prescribed intervals beyond the Company's current practices, FortisAlberta would likely require additional resources to implement and administer those requirements. Depending on the scope and frequency of the mandated communications, additional staffing may be necessary to prepare, coordinate, and deliver updates, and maintain compliance with the new requirements. As a result, the Company would expect that any such obligation be accompanied by appropriate cost recovery mechanisms to fund the additional personnel and administrative resources required to support the enhanced communications framework.

a. Every 14 days

As noted above, FortisAlberta is already typically conducting bi-weekly meetings with large MG proponents once the DLS is completed. With respect to small MG projects, the Company does not consider regularly scheduled meetings or status updates to be necessary. Given the nature of these projects, FortisAlberta's practice is to communicate with customers and/or consultants when there is a substantive change in project status, additional information is required, or action is needed to advance the application. The Company believes this approach provides customers with timely and relevant information while

avoiding unnecessary communication during periods when no meaningful project developments have occurred.

b. When the project enters a new phase

FortisAlberta currently provides communications to proponents of both small and large MG projects when the project reaches a key milestone or advances to a new stage of the connection process.

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

FortisAlberta currently provides communications to proponents of both small and large MG projects when changes may be required to a project's specifications.

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

For small MG projects, FortisAlberta does not generally implement a timeline under which the project will stale-date. However, the Company will typically follow up with a customer and/or their consultant when there has not been movement on the project for a significant period of time, for example, one year. At that time, FortisAlberta will ask the project proponent to update any project information that may be required in response to new technical specifications.

For large MG projects, the Company communicates with the customer and/or consultant when information is about to stale-date. FortisAlberta communicates this as part of the regularly scheduled project meetings.

e. Other

In addition to the above noted communications, FortisAlberta remains available to respond to customer and consultant inquiries throughout the connection process. The Company addresses ad hoc requests and communications from customers and consultants to support timely issue resolution and facilitate efficient project progression.

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).

In FortisAlberta's view, the most effective method for exchanging information between distribution facility owners and customers is highly dependent on the nature and complexity of the information being communicated. For routine updates, such as advising customers on the status of their project or requesting additional application information, email is generally the most efficient and effective communication tool. For more complex matters, however, meetings or direct discussions are often more effective. Where issues require detailed explanation, technical discussions, or clarification of customer-specific circumstances, meetings can facilitate a more productive exchange of information and help ensure that all parties have a common understanding of the issue and any required next steps. Accordingly, a combination of communication methods is generally the most effective approach, with email used for routine updates and information sharing, and meetings reserved for more complicated issues that require additional explanation or discussion. This approach helps balance timely communication with the staffing and resource requirements associated with more resource-intensive engagement methods.

a. Direct emails/phone calls

See response above.

b. In-person or virtual meetings

See response above.

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

FortisAlberta currently provides updates on its website to communicate technical requirement updates.

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

A centralized hub, such as the AUC's website, could serve as a single source of information for topics such as the requirements of the *Micro-Generation Regulation,* explanations of key eligibility criteria (including the requirement that a MG unit be sized to meet all or a portion of the customer's electricity

needs), applicable application forms, and relevant rules and guidance documents. Providing this information in one location would help promote a common understanding of regulatory requirements and reduce the need for stakeholders to obtain the same information from multiple sources. FortisAlberta understands that the AUC website is already hosting much of this information, however, further information regarding the eligibility criteria could be helpful for all parties.

e. Other

FortisAlberta does not have additional comments on the most effective methods for DFOs and customers to exchange necessary information in a timely fashion.

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?

In FortisAlberta's view, opportunities to improve communication processes should be focused on enhancing customer understanding of connection requirements and timelines, while maintaining timely and efficient exchanges of information between parties.

The Company is committed to communicating with customers in a timely manner throughout the connection process and continually seeks opportunities to improve the customer experience. In response to customer feedback regarding large MG projects, FortisAlberta has implemented a process whereby customers and their representatives are offered a presentation outlining the subsequent steps in the connection process, key milestones, and applicable timelines. This proactive engagement provides customers with greater visibility into the process and helps establish clear expectations regarding project progression.

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?

For small MG projects, FortisAlberta communicates any requirement to reduce the proposed project size through an initial email notification. Should the customer require additional information or clarification regarding the rationale for the size reduction, Company representatives are available to discuss the matter further through direct engagement.

For large MG projects, FortisAlberta conducts a preliminary, high-level capacity assessment that may identify potential constraints requiring a reduction in project size. Where this preliminary assessment indicates that a size reduction may be necessary, the

Company communicates this information to the customer early in the process so that the customer can determine whether they wish to proceed with a DLS. However, not all capacity constraints can be identified through the preliminary assessment, and additional project size reductions may be required based on the results of the DLS. In such cases, FortisAlberta communicates the findings and any associated size reduction requirements to the customer and/or their consultant during the post-DLS meeting, where the results and next steps are reviewed in detail.

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

The options available for a project that requires a size reduction are dependent on the specific circumstances and system constraints giving rise to that requirement. Generally, customers may be able to proceed by selecting one or more of the following options: converting the project to a non-export configuration, reducing the project's nameplate generation capacity, reducing the number of inverters, requesting system upgrades where feasible, implementing curtailment measures to limit output under certain conditions, or electing not to proceed with the project.

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.

FortisAlberta's rationale for providing updates to customers is generally based on whether there is a meaningful development in the status of the customer's MG project. The Company seeks to provide communications that convey new information, identify required customer actions, communicate study results, or advise of changes that may affect project timelines, scope, or connection requirements.

As previously noted, requiring communications at a fixed cadence, regardless of whether there is new information to share, would likely necessitate additional administrative resources without providing a corresponding benefit to customers. In FortisAlberta's view, communications are most effective when they are tied to meaningful project milestones or developments, ensuring customers receive relevant and actionable information while allowing resources to remain focused on advancing project reviews and facilitating timely connections.

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.

No, see comments 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.

While FortisAlberta has the information that would allow it to assess existing MG units for excess generation, the Company does not currently undertake this assessment. Doing so would not be manageable given the large number of MGs connected to the Company's system and FortisAlberta's current resources. FortisAlberta would require additional resources and investments to take responsibility for this work. The Company notes that the necessary resources and investments are not contemplated or funded in the third Performance Based Regulation term plan.

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

FortisAlberta notes that AUC Form A does not currently reflect the characteristics of newer MG technologies such as combined heat and power (CHP) units. For example, the form asks applicants to confirm whether inverters comply with CSA Standard C22.2 No. 107.1 and the UL1741 Supplement Standard. As CHP units do not utilize inverters, these questions are not applicable to this technology. However, it remains important for CHP unit proponents to demonstrate that the generating unit itself complies with the applicable CSA and UL1741 standards and any other relevant certification requirements. Updating the form to better accommodate non-inverter-based generation technologies would help ensure that applicants can provide accurate and meaningful compliance information while avoiding confusion regarding requirements that are not applicable to CHP systems.