Rule 024 stakeholder comment matrix

Comments from *(company/stakeholder name)*:	CanREA (Canadian Renewable Energy Association)	**Contact name *(for companies)*:**	Radha Rajagopalan
Date [yyyy/mm/dd]:	2026/08/17	**Phone:**	[redacted]
		Email:	[redacted]

Instructions:

1. Please download this document, save as "**Rule 024 matrix**" and fill out the demographic/contact information above.
2. Please review Bulletin 2026-10 and the blackline document for Rule 024: *Rules Respecting Micro-Generation.*
3. Please comment on the proposed information requirements below, including whether you agree that these information requirements should be included in an application under Section 4(3) or 4(3.1) of the *Micro-generation Regulation*. Please explain your position.
4. There are two open-ended questions included at the end of the document, including an opportunity to provide any additional information requirements that you believe should be included.
5. You can submit comments on as many or as few of the proposed changes as you wish. Blank boxes will be interpreted as neutral/favourable.
6. If a change from the blackline documents does not appear in the table below, it is considered administrative. You may provide comments on administrative changes in the general box at the end, if necessary.
7. While not all suggestions can be implemented, all relevant comments will be fully reviewed and considered.
8. Submit your response to engage@auc.ab.ca. In the email, please include the following subject line: **Rule 024 engagement**.

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Please review Sections 4(3) and 4(3.1) of the *Micro-generation Regulation:*

Connection and operation

4(3) Where in the opinion of the owner, concurred in by the Commission on application by the owner, the costs of connecting a particular micro-generation generating unit to the interconnected electric system are extraordinary, due to safety considerations, technological complexity or any other reason, the owner may require that the micro-generator directly reimburse the owner for the extraordinary portion of the costs.

(3.1) Where a micro-generator has changed the nameplate capacity of a micro-generation generating unit that is connected to the interconnected electric system and, in the opinion of the owner, concurred in by the Commission on application by the owner, the costs of maintaining the connection of the micro-generation generating unit to the interconnected electric system are extraordinary, due to safety considerations, technological complexity or any other reason, the owner may require that the micro-generator directly reimburse the owner for the extraordinary portion of the costs.

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Rule 024: New Section 6(2) **2) An application under Section 4(3) or 4(3.1) of the *Micro-generation Regulation* must include the following information requirements. If any of the below information is not available, the owner must explain why.**		
Category	**Proposed wording**	**Stakeholder comments**
Description of costs	c) A description of each cost, or portion of each cost, necessary to connect the micro-generation generating unit to the interconnected electric system which is, in the opinion of the owner, extraordinary. (i) Include the item or category of items associated with each cost. The item or category of items may include, for example, specific equipment, equipment upgrades, studies, or protective devices. (ii) For any equipment upgrades, please indicate if existing equipment will be salvageable. If yes, please ensure the salvage value of the existing equipment is deducted from the extraordinary costs. If there is a reason why the salvage value should not be deducted from the extraordinary costs, please explain. (iii) For any included cost that does not have a finalized cost estimate, please indicate when a finalized cost estimate is expected.	CanREA supports requiring owners to itemize each claimed cost and recommends that owners also identify whether each cost is a hardware cost or a "soft cost" (administrative, engineering, or regulatory expense not tied to physical equipment). Distinguishing these categories is consistent with CanREA's guidance, which identifies soft costs as a major, often-reducible driver of delay and expense in interconnection. CanREA supports the requirement that salvage value be deducted from claimed extraordinary costs, and recommends the AUC adopt a standard depreciation/salvage-value reference table so this calculation is applied consistently across owners. For item (iii), CanREA recommends the AUC sets expected timeframes for an owner to provide a finalized cost estimate, rather than leaving this open-ended, consistent with CanREA's recommendation that interconnection processes use clear, standardized timelines to reduce uncertainty for applicants.
Comparative analysis	d) For each of the costs provided in (c), please provide a comparative analysis that explains why the owner considers these costs to be extraordinary, for example, due to safety considerations, technological complexity or any other reason. This analysis must include any supporting evidence that the owner considers relevant and may address the following: (i) The costs and types of costs to connect the average micro-generation generating unit; (ii) The costs and types of costs to connect the average micro-generation generating unit of the same size category (small <150 kW or large >150 kW); (iii) The costs and types of costs to connect comparable micro-	CanREA supports requiring utilities to apply standardized, proportional technical and cost requirements rather than case-by-case assessments that vary by owner. Utilities should consider technical alternatives before requiring costly infrastructure upgrades, such as export limitation methods, inverter-based power control settings, or a flexible hosting-capacity arrangement.

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	generation generating units (i.e., similar nameplate capability, geographic area, safety, technical, or other reasons); (iv) Any specific characteristics of the micro-generation generating unit that contribute to the technological complexity of connecting the micro-generation generating unit to the interconnected electric system; (v) Any factors related to the connection of the micro-generation generating unit that may impact the safety and/or reliability of the interconnected electric system, along with any implemented or planned mitigation strategies; and (vi) Any other information the owner considers relevant to the Commission's consideration.	
General		
Section 6(1) of Rule 024 states that "the owner shall file a completed notice of dispute…within 14 days from the date in which the owner finalizes its cost estimate". The Commission is aware that the cost estimates for each item or category of items associated with the connection of a micro-generation generating unit may be finalized at different times in the connection process. Please comment on the optimal timing for an owner to submit an application under Section 4(3) or 4(3.1) of the *Micro-generation Regulation*.		**Stakeholder comments**: CanREA's primary recommendation is that the Commission address the timing of the underlying cost information, not just the deadline for notifying the customer of it. CanREA recommends the AUC require owners to offer a preliminary, non-binding cost screening -- based on the customer's address and proposed system size, before equipment is purchased or installed -- so that customers likely to face extraordinary costs can find out early enough to make an informed decision. As a secondary, complementary measure, CanREA also recommends replacing the current open-ended trigger for Section 6(1) (the date on which the owner finalizes its cost estimate) with a fixed maximum timeframe, such as a set number of days following completion of the technical/engineering assessment, so that once a customer is already committed, they are at least notified promptly and predictably rather than facing an open-ended wait. CanREA's Interconnection Guidance identifies slow, unpredictable interconnection pathways as a key barrier to solar and battery adoption, and supports giving customers decision-relevant cost information as early in the process as possible.
Please provide any additional information requirements that should be included in an application under Section 4(3) or 4(3.1) of the *Micro-generation Regulation*. Please explain your position.		**Stakeholder comments**: CanREA recommends the application also require the owner to state whether the extraordinary cost could be reduced or avoided through alternative technical measures -- such as export limitation methods, inverter-based power control settings, or a flexible

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	hosting-capacity arrangement -- before requiring the micro-generator to reimburse the full extraordinary cost. This reflects CanREA's Interconnection Guidance recommendation that utilities consider technical alternatives before requiring costly infrastructure upgrades. CanREA also recommends the application require the owner to indicate whether the connection involves a Battery Energy Storage System (BESS), whether stand-alone or paired with solar, so that cost data for storage-inclusive connections can be tracked and reported separately as this technology scales.