Rule 024 stakeholder comment matrix

Comments from *(company/stakeholder name)*:	EPCOR	**Contact name *(for companies)*:**	Teresa Crotty-Wong
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		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.	(i) Material lists can be provided for the necessary upgrades, however itemized costing would not be able to be shared, as those costs are confidential and part of Master Service Agreements with suppliers. (ii) Switches, cubicles and transformers could be identified as salvageable, but salvage value may not be available at the point when extraordinary costs are calculated. Salvage value is calculated following decommissioning, inspection, testing and refurbishment. (iii) The costs and timeframes associated with putting together a finalized cost estimate requires an extensive amount of effort depending on the micro-gen application sizing requirements. Multiple scenarios have different requirements: a) Under 150kVA micro-gen with no equipment upgrades b) Under 150KVA micro-gen with equipment upgrades: transformer upgrade and primary cable. c) Over 150kVA micro-gen with no equipment upgrades: requires a system planning interconnection study. d) Over 150kVA micro-gen with equipment upgrades: requires a system planning interconnection study, possible transformer upgrade, potential primary cable circuit upgrades, possible communication requirements. As noted by EDTI in its response to question 2 of the questionnaire, EDTI recommends that the term “extraordinary costs” be defined.
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-	Each installation is unique in its requirements, system size and location on the distribution system, and therefore cost comparison is difficult between applications and may not illustrate a meaningful comparison. Further, connection costs could vary as more micro-generation is connected to a circuit. (i), when connecting an average residential micro-gen under 150kVA, typically there are no costs associated, but technical analysis may determine additional requirements. For

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	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-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.	example, if multiple generation is added to a transformer or a circuit, provisions will be required to handle the additional generation being added. (ii) There is too much variability to give a unit average for small or large micro-generation installations. (iii) The costs would be similar if comparable units (same area, same circuit), except where adding an additional micro-gen to a transformer exceeds the transformer rating, and the transformer needs to be replaced with a transformer with larger capacity. (iv) Larger micro-generation units (>= 150kVA) require an interconnection study, which may conclude that communication and interface requirements are required. This may the installation of equipment that provides the ability to monitor, and possibly control, the micro-generation connection to the distribution system. (v) Safety and reliability to our system would be outlined in the interconnection study.
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**: Optimal time would be 14 days after the customer has acknowledged and confirmed dispute of costs associated with the estimate. EPCOR's estimates are valid for 90-days before costing needs to be reevaluated.
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.	Having a single form for disputing associated costs *or* micro-generation qualification, instead of two separate forms would be beneficial. Currently Form B is for only micro-generation qualifications, but nothing regarding costs; while AUC Rule 024 is for disputing costs. This would reduce potential confusion for owners and customers.