AUC
Alberta Utilities Commission

Rule 024 engagement questionnaire

Comments from ***(company/stakeholder name)*****:**	EPCOR	**Contact name** ***(for companies)*****:**	Teresa Crotty-Wong
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Role:	Senior Director	**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 only activities within EDTI's control, the average timeline to process and facilitate the connection of a small (<150 kW) microgeneration generating unit is approximately 18 days. These activities include application acknowledgement, technical review, commissioning and execution of the Interconnection Agreement.

   However, the overall customer connection timeline may be longer and is influenced by factors outside of EDTI's control. These factors include incomplete or inaccurate applications, customer delays in executing the ICA, and the time required to obtain permits and complete inspections.

   For larger microgeneration projects (150 kW–5 MW), the interconnection timeline is generally longer and less predictable. These projects may take several months to complete in straightforward cases, but they can extend to several years. These projects often require additional coordination, including hosting capacity assessments, communications and protection requirements, and interconnection studies. As a result, connection timelines for larger microgeneration facilities can vary significantly based on project-specific technical requirements and system impacts.

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

   Yes. While EDTI's average processing timeline for activities within its control is approximately 18 days, delays do occur throughout the microgeneration connection process. Delays frequently occur when applications contain missing, incorrect, or inconsistent information. Examples include incorrect service addresses, discrepancies between supporting documentation and application details, and incomplete technical information. Additional time is required for applicants to correct and resubmit the necessary information before processing can continue.

   Another example resulting in delays involves aggregation requirements. EDTI has recently observed an increase in applications where the proposed configuration does not align with requirements related to aggregation. In these cases, additional time is required to clarify the applicable requirements with the customer and for the customer to update their application and, where necessary, modify existing service configurations to meet the requirements in the Microgeneration Regulation. These delays are outside the control of the Distribution Facility Owners.

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:

EDTI currently provides comprehensive information and guidance on its website and throughout the microgeneration application process. Based on our experience, most delays are not caused by a lack of available information. Rather, they typically result from incomplete or inaccurate application submissions, delays in customer responses, and misunderstandings of applicable regulations and requirements.

To help address these challenges, EDTI implemented a webform in 2024 with mandatory fields, validation rules, and stricter formatting requirements to improve the accuracy and completeness of submitted applications. Since its implementation, these measures have helped reduce delays associated with missing or incorrect information.

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

EDTI supports providing customers with general information outlining the key phases of the microgeneration connection process, the activities involved, and the responsibilities of both the customer and the DFO. This information can help customers better understand the overall process and the factors that may influence the timing of their project.

However, EDTI does not support publishing specific, comparative, or generalized connection timelines, as timelines can vary significantly between DFOs and individual projects. The connection process is dependent on numerous factors, including the completeness of the application, the complexity of technical reviews, execution of the Interconnection Agreement, permitting requirements, inspections, and customer response times. Many of these activities are outside the DFO's direct control. Accordingly, EDTI considers it important to avoid creating expectations of completion dates or defined processing periods, as actual project timelines are dependent on project-specific circumstances and a range of external factors.

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

Providing information specific to the size and characteristics of the customer's proposed project would provide the greatest value.

EDTI sees limited value in providing a direct comparison of connection timelines and requirements between small (<150 kW) and large (150 kW–5 MW) microgeneration projects, as customers are only interested in the requirements applicable to their specific project. Providing project-specific

information is more useful than presenting information for irrelevant categories.

It is beneficial to identify that larger microgeneration projects involve additional technical reviews and coordination activities, such as hosting capacity assessments and interconnection studies. This can help proponents of larger projects understand that their connection process may be more complex and may require longer timelines.

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).

EDTI supports providing information regarding common causes of delays, as greater awareness may help reduce application deficiencies and improve the efficiency of the connection process. The most common causes of delay are incomplete or inaccurate application submissions, missing supporting documentation, inconsistencies between application information and service records, delays in responding to requests for information, and misunderstandings regarding requirements.

iv. 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:

All information required to process a microgeneration application is identified in EDTI's publicly available documentation and online application form. Applicants can help minimize delays by ensuring that all required information is complete and accurate when the application is initially submitted.

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

EDTI requires applicants to provide the manufacturer's specification sheet as part of the microgeneration application process. The manufacturer's specification sheet includes the technical information necessary to assess the proposed equipment, while any additional technical details required for the review are captured through the project drawings and other application requirements.

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.

Where an application includes a proposed microgeneration system size that exceeds what would be supported by the customer's historical annual electricity consumption, EDTI requires the applicant to provide supporting documentation to justify the increased consumption including a HOT2000

report identifying the simulation inputs and estimated annual electricity consumption, or electricity consumption calculations stamped by an APEGA-licensed professional engineer demonstrating the expected future annual consumption. These requirements are identified during the initial application process. EDTI may request further supporting documentation during application review when it is determined that the proposed generation capacity exceeds the site's historical annual electricity consumption and sufficient justification was not included with the initial submission.

iii. **Other (please explain).**

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.**

EDTI does not specifically track the causes of delayed applications. Generally, however, the most common causes of delay are incomplete or inaccurate application submissions, missing supporting documentation, inconsistencies between application information and service records, delays in responding to requests for information and misunderstandings regarding requirements. For delays attributable to the Micro-generation Regulation requirement that a microgeneration generating unit be sized to supply all or a portion of a customer's annual energy consumption the issue is typically identified and resolved during the application review process. Once the customer's consumption information is reviewed and the requirements are communicated, applicants will make any necessary adjustments to the proposed system size. In these cases, the primary source of delay is typically the time required for the customer or their representative to submit revised application information.

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.**

   a. **Legislative requirements applying to microgeneration in Alberta.**

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

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

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

Year	Number of Large Microgeneration Applications
2023	16
2024	8
2025	16
2026	17

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.)?

In EDTI's service area, no large microgeneration project applicants have cancelled their projects after their application has been approved.

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.)?

EDTI has not cancelled any approved large microgeneration applications, nor have any approved large microgeneration applications been withdrawn by applicants after approval. EDTI has observed instances where customers or project proponents have chosen not to pursue their proposed projects after reviewing the results of the interconnection study, prior to approval.

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.

EDTI has not experienced any cancellations of large microgeneration applications, either by EDTI or by applicants after approval, and therefore does not have sufficient data to establish or compare cancellation rates.

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.

EDTI does not have the data to identify trends or factors associated with the cancellation of large microgeneration projects

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?

EDTI is unable to provide comments, as we have not cancelled any large microgeneration applications, nor have any applications been cancelled by the applicants after approval.

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

EDTI is unable to comment on the level of awareness among customers and microgeneration proponents regarding the Small Scale Generation Regulation.

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

EDTI's familiarity with the Small Scale Generation Regulation is limited. The greatest benefit would come from clear technical and regulatory guidance that helps customers and proponents understand the generation pathway applicable to their project and the associated interconnection requirements.

This guidance could include information on eligibility criteria, connection requirements, and the key differences between projects governed by the Small Scale Generation Regulation and those that qualify as small or large microgeneration projects. Improved understanding of these distinctions during the planning stage may help customers and proponents select the appropriate regulatory framework, develop compliant project designs, and submit more complete and accurate applications

Early communication between applicants and their distribution facility owner is important. Distributors can help clarify application requirements, while applicants can seek guidance on the appropriate generation category and the information needed to support a successful application. This collaboration can help reduce misunderstandings, improve application quality, and minimize project delays.

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

No**.** EDTI has not connected any customers as small scale or community generators.

Cost estimates

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

   EDTI does not currently charge application or connection fees for standard microgeneration applications. As a result, EDTI has limited experience with changes to cost estimates associated with the distribution connection process for microgeneration projects.

   To the extent that project cost estimates change over the course of a project, those changes would generally be related to factors outside of EDTI's connection process, such as project redesigns, equipment substitutions, permitting requirements, construction costs, contractor pricing, or other customer-specific considerations. EDTI does not have visibility into, or oversight of these customer and installer costs and is therefore unable to comment on the frequency or magnitude of such changes.

   Every Microgen project is subject to an Engineering review. Microgen applications for 150kW or greater generation also require an Interconnection Study. The results from this study may indicate that a Communication Study is required, because visibility and/or control of the large Microgen system is required for Distribution System reliability and safety. A project estimate is compiled through each stage as required and is communicated to the customer upon completion of all studies and compilation of costs into a single estimate.

   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?**

      As noted above, EDTI has limited experience with changes to cost estimates associated with the distribution connection process for microgeneration projects.

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?**

   EDTI recommends that the term “extraordinary costs” be defined in the Regulation. EDTI uses the following definition of “extraordinary costs”:

   “Costs that are incurred solely in support of a customer’s micro-generation system that do not result in present or future direct benefits to other ratepayers and would not otherwise be incurred by the DFO had the customer’s micro-generating system not been installed.”

   EDTI considers “extraordinary” as costs that are required as a result of utility grid assets that need to be relocated, removed, modified and/or upgraded due to the microgeneration requirement.

   Customers should be informed of the potential for extraordinary costs as early as practicable in the connection process, once sufficient information is available to identify

whether such costs may be required. For EDTI's customers, this typically occurs during the technical review and interconnection study stages, when the need for additional infrastructure, telecommunications equipment, protection systems, or transmission-related facilities can be assessed.

Technical standards

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

   Technical standards associated with a microgeneration unit connection do not typically change during the connection process. Applicable requirements are generally established through the Alberta Utilities Commission (AUC) Micro-Generation Regulation and Rule 024, the Alberta Electrical Utility Code (AEUC), relevant Canadian Standards Association (CSA) standards, and EPCOR's Customer Connection Guide.

   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?**

      If technical requirements were to change while an application is in progress, EDTI would notify the applicants of the change and direct them to the updated technical standards and requirements. It is the responsibility of the applicant and their installer to review, understand, and comply with all applicable codes, standards and technical requirements in effect at the time of installation and connection. Any necessary modifications to the project to meet updated requirements would be the responsibility of the applicant and their installer.

Communication

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

   EDTI's primary communication channel between EDTI, customers, contractors and other stakeholders is through our microgeneration mailbox. This provides a central point of contact for application inquiries, submissions, status updates, and requests for information throughout the connection process.

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.**

   EDTI provides customers with updates at key milestones throughout the microgeneration connection process via email. Customers are typically notified when their application is received and once the application has been reviewed for completeness and advanced to the engineering review stage. Additional communication may occur as required throughout the review process, including requests for information or clarification.

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.

EDTI does not support prescribing a fixed frequency for status updates on microgeneration applications. The appropriate level and timing of communication will vary depending on the complexity, size, and stage of the project. For both small and large microgeneration projects, applicants and their installers are responsible for advancing their projects through the application and construction process. Applicants may, and frequently do, contact EDTI at any time if they have questions regarding the status of their application or require clarification on next steps.

a. Every 14 days

No. EDTI does not support prescribing a fixed frequency for status updates on microgeneration applications.

b. When the project enters a new phase

Yes, EDTI supports customers receiving updates when their project enters a new phase of the connection process. This approach provides customers with meaningful information regarding the status of their application while avoiding communications that do not reflect substantive progress. EDTI notifies customers when the application has been received, when the application has been determined to be complete and contains all required information, and when the EDTI Interconnection Agreement is ready for review and execution. In addition, customers may receive updates related to project-specific activities, such as the completion of an interconnection study or other engineering assessments. EDTI considers milestone-based updates to be an effective communication approach, as they provide customers with relevant and actionable information at key stages of the connection process while reflecting the differing complexity and timelines of small and large microgeneration projects.

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

Yes, EDTI considers it reasonable to provide customers with updates when new information is received that may affect a microgeneration project's scope, design, requirements, or timelines. Timely communication helps ensure customers are aware of potential impacts to their project.

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

Yes, EDTI considers it reasonable to contact customers when required information or a response has not been received and the application cannot progress further. These communications should clearly identify any outstanding requirements, the actions required by the customer, and any applicable timelines for responding. Where a customer does not respond to repeated requests for information or there

has been a prolonged period of inactivity with no indication that the project is continuing, EDTI may advise the customer that the application is at risk of cancellation. If no response is received within the specified timeframe, EDTI considers it reasonable to cancel the application to ensure application records accurately reflect active projects and available resources are focused on progressing viable applications.

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).

EDTI is of the view that timely and effective communication can be achieved through a variety of methods, and that each distribution facility owner should have the flexibility to determine the communication approach that best aligns with its operational processes, customer needs, and available resources.

EDTI primarily uses email as its method of communication with customers, contractors, and other stakeholders throughout the microgeneration connection process. Email provides an efficient means of exchanging information, submitting documentation, maintaining a record of communications, and coordinating activities among multiple parties.

a. Direct emails/phone calls

While telephone calls can be useful for discussing complex issues or clarifying requirements, EDTI considers email to be the primary communication method because it allows decisions, action items, requirements, objections, and project status updates to be clearly documented and referenced throughout the application process.

b. In-person or virtual meetings

EDTI considers in-person or virtual meetings to be beneficial only where project complexity, technical issues, or stakeholder coordination requirements warrant more detailed discussion

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

Website updates are most appropriate for information that applies broadly to all applicants, such as changes to application requirements, technical standards, or forms.

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

A centralized hub, such as the AUC's website, is effective as a source of general information and guidance, while project-specific communications should continue to be delivered directly to customers.

e. Other

EDTI's information technology roadmap includes exploring the development of a customer self-service portal integrated with its website. After migrating the microgeneration webform to the portal, applicants with a login would have the ability to track the status of their application through each stage of the connection process and access relevant project information directly. This type of self-service functionality will further improve transparency, enhance the customer experience, and reduce the need for routine status inquiries while maintaining efficient use of staff resources.

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?

EDTI does not have any concerns with the current communication processes used during the microgeneration connection process

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?

EDTI communicates the requirement to the customer or their representative through email. The communication outlines the basis for the assessment, including a comparison of the customer's historical electricity consumption and/or submitted load calculation reports against the proposed microgeneration system size.

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

When EDTI determines that a proposed microgeneration system size must be reduced to comply with legislative requirements or program eligibility criteria, customers are informed of the rationale for determination and the options available 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.

EDTI provides customers with updates at key milestones throughout the microgeneration application process. Customers are notified when the application has been received, when the application has been reviewed and deemed complete with all required information,

when the EDTI Interconnection Agreement is ready for review and execution, and when the site has been successfully commissioned.

EDTI's rationale for providing updates at these stages is that they represent meaningful progress points in the connection process and provide customers with information that is relevant and actionable. Additional communication may occur where EDTI requires further information from the customer, identifies issues that may delay the application, or need to communicate project-specific requirements. This approach allows customers to remain informed of significant developments while supporting the efficient administration of the application process.

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, EDTI does not consider more frequent status updates to be a feasible or necessary approach in general. Providing additional status updates between these milestones would require additional administrative effort and resources, which could increase workload for application processing staff without materially improving customer outcomes. Notably, EDTI maintains a Microgen Inbox that enables customers to send inquiries.

EDTI's information technology roadmap includes exploring the development of a customer self-service portal integrated with its website. The potential portal could provide applicants with the ability to track the status of their application through each stage of the connection process and access relevant project information directly. EDTI believes this type of self-service functionality has the potential to improve transparency, enhance the customer experience, and reduce the need for routine status inquiries while maintaining efficient use of staff resources.

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.**

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.**

   EDTI has internal controls and processes in place to monitor potential compliance risks related to microgeneration installations. A cross-functional team within EDTI reviews microgeneration customer consumption and generation data on an annual basis, including analysis of sites that may be generating electricity in excess of their annual consumption.

   At present, EDTI has not observed widespread non-compliance with the Micro-generation Regulation. EDTI attributes this, in part, to process improvements implemented in 2023

between EDTI and the City of Edmonton's Electrical Inspection group, whereby an executed Interconnection Agreement is required prior to final inspection and connection to the grid. This process enhances alignment between permitting, inspection, and connection activities and helps ensure that microgeneration systems comply with applicable sizing requirements before they are energized.

Based on current processes and available metering data, EDTI generally has the information necessary to identify sites that may be generating electricity in excess of their annual consumption. EDTI is not aware of any provision within the Micro-generation Regulation that provides distribution facility owners with the authority to impose penalties, charges, mandatory corrective actions, or other enforcement measures where a customer is found to be generating electricity in excess of the regulatory limits. Although over-generation has not been identified as a widespread issue, EDTI recognizes that sustained over-production on a broader scale could have implications for other customers and the distribution system, including increased system loading and the potential need for infrastructure upgrades to maintain reliability. Therefore, if over-generation were ever to become an issue, EDTI's Distribution Connection Services Terms and Conditions state that EDTI can disconnect customers when in "violation of the terms of their Interconnection Agreement with EDTI" and/or poses "may cause damage to EDTI's Facilities or interfere with or disturb service to any other Customer" (Section 8.3.3).

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

Manual Commissioning Process

EDTI has observed a process constraint related to the current functionality of the AESO portal. While the portal supports batch uploads of site data via spreadsheet, each site still requires individual manual steps to complete the commissioning process. As the volume of micro-generation applications continues to grow, the need for manual intervention at this stage is becoming a limiting factor in processing efficiency and turnaround times.
EDTI recommends including the AESO in any established working groups to explore enhancements that could improve automation and streamline the commissioning workflow for the industry. Potential areas for improvement could include:

- Enabling full batch processing and submission for multi-site commissioning.
- Exploring integration options (e.g., APIs) to facilitate more seamless data exchange between DFO systems and the AESO portal.

These enhancements would support the future scalability of micro-generation applications and contribute to a more efficient and responsive interconnection process.

Single Feeder Requirement

EDTI recommends that the Regulation be amended to remove the single feeder requirement in the aggregation definition. Although it is important that the feeders be owned by one electric distribution company, there may be (mostly urban) situations where a customer on a single site is fed by two different feeders. Alternatively, there may be situations where the DFO reconfigures feeders to meet system needs, inadvertently depriving a customer of the opportunity to aggregate under the Micro-generation Regulation.