Rule 024 stakeholder comment matrix

Comments from *(company/stakeholder name)*:	Retrofit Canada Society	**Contact name *(for companies)*:**	[redacted]
Date [yyyy/mm/dd]:	2026/08/17	**Phone:**	-
		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**.

Rule 024 stakeholder comment matrix

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.

Rule 024 stakeholder comment matrix

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) Retrofit Canada 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" (e.g., administrative, engineering, etc.). Additionally, we recommend the application require the owner to track and report on any costs associated with battery energy storage systems separately from the solar installation. Assets that are already due for replacement or upgrade should be excluded.** **(ii) Retrofit Canada 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 that this calculation is applied consistently across owners.** **(iii) Retrofit Canada recommends the AUC sets expected timeframes for an owner to provide a finalized cost estimate, rather than leaving this open-ended.**
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-generation generating units (i.e., similar nameplate	**While Retrofit Canada supports the concept of requiring owners to explain why they consider costs to be extraordinary, we believe the framing of this section is problematic. Rather than focusing on a comparative analysis to demonstrate the extraordinary, Retrofit Canada recommends owners be required to explain why/how no other users would or could benefit from the upgrades that are being considered for that particular site. This is the approach that some owners already take to determine what is extraordinary, and that approach should be stipulated for all owners.** **Additionally, Retrofit Canada recommends the application 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 hosting-capacity arrangement.** **Any comparative analysis that is included should be made mandatory.**

Rule 024 stakeholder comment matrix

	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:** **Retrofit Canada recommends binding and enforceable maximums be implemented to ensure that owners provide adequate resourcing/staffing to maintain an efficient and responsive system. Multi-month application backlogs in some regions must come to an end.** **Additionally, it is essential that sizing compliance matters be assessed up front, rather than after systems have already been installed (as is the case in some regions but not others). Consistent with section c) of this Matrix, owner concerns over sizing must be accompanied by a disclosure of their voltage assessment methodology, assumptions, and conductor data.** **We also recommend that the Microgeneration Regulation be amended by adding an exception to the current limits on generation for sites with a 200A residential service or less to enable owners to focus resources on projects that are more impactful to their grid (e.g., those requiring the cost estimates outlined here).**
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:** **No cost liability should be stated or implied to a customer by an owner before Commission concurrence under S.4(3).**