AUC
Alberta Utilities Commission

Rule 024 stakeholder comment matrix

Comments from *(company/stakeholder name)*:	Western Solar	**Contact name *(for companies)*:**	Lewis Marshall
Date [yyyy/mm/dd]:	2026-09-08	**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**.

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.	**We support the requirement for DFOs to provide itemized descriptions of costs. For item (i), we recommend breaking out equipment costs from Admin/Engineering costs.** **In addition, some costs originate from the TFO; it should be required that the TFO provides itemized costs to the DFO, who in turn can then provide the itemized costs to the customer.** **For item (ii), DFOs should reference standard equipment depreciation values when determining equipment salvage value.** **For item (iii), the AUC should establish expected timeframes for the DFO to provide this information.** **DFOs should provide information to the customer on how extraordinary costs can be reduced/eliminated by other means (e.g. system capacity reduction, implementation of different DER-equipment). DFOs should be expected to disclose details regarding their assessment (studies, equipment/wire information) to ensure the customer has a full understanding of where the costs are coming from and why they are necessary.**
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-	**Comparative analysis should factor in other customers' benefit of the upgrades. If other customers will benefit from the upgrade, then the MicroGen customer should not bear the full cost.**

Rule 024 stakeholder comment matrix

	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.	
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:** **It is acknowledged that it is not always possible to provide final cost estimates for all items concurrently, however full cost estimates need to be provided prior to the connection stage in which the customer will be purchasing their own equipment and organizing engineering studies (where applicable). The AUC should consider implementing a maximum timeframe to provide full cost estimates from the date that the owner receives an application (for example, 60 days from receipt of application), in addition to the proposed 14-day deadline to submit cost estimates from the date they are finalized. This will avoid the situation where a project experiences extended delays while the DFO completes the full itemized cost estimate.**	
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:** **Estimates should make clear that the customer bears no liability for costs until approved by the AUC.**	

Rule 024 stakeholder comment matrix

	In addition, provision should be made for the situation where, upon agreement between DFO and customer, the customer may pay some or all of the portion of costs prior to AUC formal approval (for example, paying a deposit for system upgrade studies). This will allow willing customers the ability to keep their application moving through the connection process if they desire.