Rule 024 stakeholder comment matrix

Comments from *(company/stakeholder name)*:	Utility Network & Partners Inc.	**Contact name (*for companies*):**	Darren Chu
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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.	**UTILITYnet supports the proposed information requirements. Requiring the owner to clearly identify and itemize the costs it considers extraordinary will provide greater transparency for micro-generators and assist the Commission in determining whether direct reimbursement is appropriate.** **We recommend that the final requirement also clarify that the amount identified as extraordinary should represent the net incremental cost attributable to the particular micro-generation connection. In addition to salvage value, the owner should identify any applicable offsets, contributions, avoided costs, or other recoveries that would reduce the amount directly attributable to the micro-generator.** **Where a cost estimate has not been finalized, the micro-generator should be informed as early as reasonably possible of the estimated amount, the basis for the estimate, and when a finalized estimate is expected. This will help customers make informed decisions before incurring significant project costs.**
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-	**UTILITYnet supports requiring a comparative analysis demonstrating why a connection cost should be considered extraordinary. However, greater guidance may be beneficial to promote consistent application of the term "extraordinary" across distribution service areas.** **In particular, the Commission should consider providing guidance regarding the appropriate basis for determining an "average" or "comparable" micro-generation connection. Comparisons should reflect relevant characteristics such as generating capacity, distribution system configuration, geographic circumstances and technical requirements, while maintaining sufficient consistency that similarly situated micro-generators are not subject to materially different tests depending solely on the distribution service area in which they are located.**

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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.	**We also note that subsection (d)(ii) describes the size categories as "small <150 kW or large >150 kW." The Micro-generation Regulation defines large micro-generation as having a total nameplate capacity of at least 150 kW. We recommend changing ">150 kW" to "≥150 kW" for consistency with the Regulation.**
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:** **UTILITYnet recommends that an owner submit an application as soon as it has sufficient information to reasonably determine that extraordinary connection costs are likely to arise and can provide a sufficiently developed estimate of those costs.** **Requiring every individual cost to be finalized before an application is submitted could unnecessarily delay the process and may result in a micro-generator proceeding too far into project development before becoming aware of potentially material extraordinary connection costs. Conversely, an application should not be based primarily on speculative or preliminary costs that cannot yet be reasonably substantiated.** **Where some costs remain subject to finalization, the owner should clearly identify those amounts as estimates, provide the basis for the estimates, and indicate when finalized amounts are expected. The micro-generator should be informed of potential extraordinary costs as early as reasonably possible so that they can make informed project and investment decisions.**

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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:** **UTILITYnet recommends that an application also include confirmation that the affected micro-generator has been provided with the extraordinary cost information being submitted to the Commission, including any amounts that remain estimates.** **The application should also identify any applicable offsets, contributions, salvage value or other recoveries used in determining the extraordinary portion of the connection costs. This would help demonstrate that the amount proposed for direct reimbursement represents the net extraordinary cost attributable to the particular connection and is not otherwise being recovered.** **We further recommend maintaining a clear distinction between the responsibilities of the distribution system owner and the micro-generator's service provider. The assessment, substantiation and recovery of extraordinary connection costs should remain between the owner and micro-generator, subject to Commission oversight, and should not create additional obligations for the customer's competitive retailer.**