Rule 024 stakeholder comment matrix

Comments from *(company/stakeholder name)*:	Utilities Consumer Advocate	**Contact name *(for companies)*:**	Vahid Jafarniya
Date [yyyy/mm/dd]:	2026/09/04	**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**.

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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.	The UCA supports the proposed information requirements. As Section 6(2)(c) applies only to costs that are considered extraordinary, the owner should provide sufficient information to clearly demonstrate why each claimed cost is extraordinary and not part of the normal cost of connecting a micro-generation generating unit. Where a cost item contains both routine and extraordinary components, the owner should identify the portion claimed as extraordinary and explain the basis for that separation. This will assist the Commission in assessing the amount claimed as extraordinary under Sections 4(3) or 4(3.1) of the Micro-generation Regulation. For each claimed extraordinary cost, the owner should provide a sufficiently detailed and auditable description of the major cost components, together with the basis for the estimate, any significant assumptions or uncertainties, and any applicable amounts that reduce the claimed extraordinary cost. The information should be sufficient to enable the Commission and the affected customer to understand the nature and amount of the claimed cost and assess whether it is reasonable and directly attributable to the project. The UCA agrees that salvage value should be deducted where existing equipment remains reusable or retains realizable value, consistent with the proposed Rule. Where the owner considers that salvage value should not be deducted, the application should clearly explain the basis for that conclusion. Where a finalized estimate is unavailable, the owner should provide the best available estimate, the assumptions on which it is based, any significant uncertainties, and the expected date of finalization. Any changes that could significantly affect the estimated extraordinary cost should be communicated promptly and explained. This information will help the Commission assess the reliability of the estimate and help the affected customer understand the potential financial implications of the project.
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;	The UCA supports the proposed comparative analysis requirements. The comparative analysis is a key component of the owner's application because it provides the evidentiary basis for the Commission to determine whether the claimed costs are extraordinary within the meaning of Sections 4(3) and 4(3.1) of the Micro-generation Regulation. The comparative analysis should provide sufficient project-specific evidence to support each reason relied upon by the owner in concluding that the claimed costs are extraordinary. The supporting information should clearly demonstrate the relationship between the identified technical, safety, reliability, or other project-specific considerations and each claimed extraordinary cost. General statements regarding technological complexity, safety concerns, reverse power flow, anti-islanding, or other

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	(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.	system impacts should be supported by project-specific engineering information sufficient to explain why those circumstances result in costs that differ from a typical micro-generation interconnection. The UCA also supports the proposed comparison with comparable micro-generation projects. Where such projects are available, the comparison should consider relevant characteristics that affect connection requirements and costs. Relevant characteristics may include generation capacity, generation technology, distribution system characteristics, geographic setting, protection requirements, and the particular technical constraint giving rise to the claimed extraordinary cost. Where the owner has previously connected projects using the same or similar generation technology, those projects may provide particularly relevant comparators. This approach will improve the relevance, consistency and transparency of the comparative analysis. Where a technically feasible alternative could reduce the claimed extraordinary costs, the owner should identify the alternative and explain why the proposed solution was selected instead. The comparison should include the key technical and cost differences between the alternatives. This is not intended to require selection of the lowest-cost alternative where it would compromise safety, reliability or applicable technical requirements. Rather, it will assist the Commission in determining whether the claimed extraordinary costs arise from a reasonable and technically justified interconnection solution.
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*.	The UCA considers the existing requirement for an owner to file a completed notice of dispute within 14 days after finalizing its cost estimate to be appropriate. However, given the Commission's recognition that cost estimates for different components of a project may be finalized at different stages of the connection process, additional guidance on when a cost estimate is considered "finalized" would improve consistency and transparency in the application of Section 6(1). The UCA recommends that, where reasonably practicable, the owner submit a single, consolidated application once the key cost components have been sufficiently developed to support a reasonably reliable estimate of the claimed extraordinary costs. The 14-day filing requirement should continue to apply once the relevant cost estimate has been finalized in accordance with the Rule. The objective should be to avoid unnecessary delay while also ensuring that the Commission receives sufficiently developed information to conduct a meaningful assessment. Where some cost elements cannot reasonably be finalized at the time of filing, the owner should identify those items, explain the reason for the remaining uncertainty, provide the best available estimate, and indicate when updated information is expected. Supplementary information or amendments should generally be limited to significant

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	new information or changes that could not reasonably have been identified at the time of the initial application. The UCA also recommends that the affected customer receive the application and supporting information relied upon by the owner at the time the application is submitted to the Commission, subject to any applicable confidentiality requirements. Providing the Commission and the affected customer with the information relied upon in support of the extraordinary cost claim promotes transparency, enables the customer to understand the basis and potential magnitude of the claimed costs, and supports meaningful participation in the Commission's review process.
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.	The UCA considers the proposed information requirements, together with the recommendations provided above, to be generally sufficient. The UCA recommends one additional information requirement. Where the owner relies on a technical standard, planning criterion, interconnection requirement, engineering guideline or similar requirement in determining an extraordinary cost, the owner should identify the specific standard or requirement applied, including its version and effective date, where applicable. This information would make clear which technical requirement was applied to the project and allow the Commission and the affected customer to confirm that the appropriate requirement was used, particularly where standards or requirements have been updated or changed over time.