Rule 024 engagement questionnaire

Comments from *(company/stakeholder name)*:	Howell Mayhew Engineering	**Contact name *(for companies)*:**	Gordon Howell, P.Eng.
Date [yyyy/mm/dd]:	2026 09 08	**Phone:**	[redacted]
Role:	solar PV system designer and developer	**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.

The timelines used to be reasonably close to the 14 day requirement, but they have got much worse. I have heard abusive horror stories from PV installers regarding Fortis. If I personally would have encountered these from Fortis I would be taking strong and professional action against this professional abuse.

However, after the 14-day requirement for the acceptance of the MG Notice, which is accomplished by the WSP's issuance of their Interconnection and Operating Agreement, they still have to change the meter from uni-directional to bi-directional, except in Edmonton, where all of EPCOR D&T's meters are already bi-directional. In addition, the WSP also needs to change the micro-generator flag in the utility site catalog from N to Y in order for exported energy to be credited by the Energy Retailer. The Retailer refuses to allow a micro-generator to join their special solar pricing without the flag being changed. Sometimes there are delays in the meter being changed and the flag being changed.

I have generally had good success with EPCOR D&T and ENMAX Power, but this last time with EPCOR D&T was very frustrating because they didn't acknowledge when I had sent them something by e-mail, so I didn't know whether they had even received my e-mail message. They should at least be required to respond within 24 hours saying "thank you for your e-mail message". As it was, it seemed that after the long 11-day delay until they had opened it, then it took only a few days to issue the Interconnection and Operating Agreement.

I haven't done a large MG PV system for a few years so I don't know what is EPCOR D&T's response is of late.

I will be submitting MG Notices for another two more small MG PV systems in EPCOR D&T's territory this year and I look forward to seeing their responses. I will be submitting an MG Notice in Fort Chipewyan this autumn and I expect a huge fight from ATCO Electric even though everything about the project will meet with all proper regulations and sizing.

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

delays – yes

the last one, with EPCOR D&T, was that they said that my drawings did not have the correct information on them, and so I pointed out where the correct information was located on my drawings. When I didn't hear from them for 2 years and started bothering them about it, then someone higher up said that I hadn't followed the correct format for the drawings. When I looked on their web page for this, the web page had many errors in it, so I hadn't taken the requirements of the web page very seriously.

The WSPs need to have their interconnection requirements well laid out and enumerated so that we can easily find them and reference them. EPCOR D&T asks if we have read their grid connection requirements but doesn't have a link to where we can find them – and so we have to go hunting through their complex web site and hope that we may have found the correct document. I thought I had read the correct document, with the list of requirements, but then I found out that what I read was actually not the correct document and not the complete list !!! sheesh

Fortis lists their grid-connection requirements very well, but the display of their documents on their web site never shows what version of the documents that they are displaying – so every time we have to go and download the document in order to find their version number – I would think that they should say "document XYZ version 5.0 publish date of yyyy mm dd". If they want to provide us with great customer service then they should have an automatic e-mail list where we can automatically be sent and update message whenever this document is revised… but of course then don't see that they make any money off micro-generation generating units so why should they care about us?

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:

The WSPs need to have their interconnection requirements well laid out, and enumerated, and easy to find so that we can easily find them and reference them.

They shouldn't make this list of requirements as part of huge long connection guide for all sorts of connections. For example, EPCOR D&T's Section 11 "Generation and Batteries" 16-page list of requirements is part of a 332 page "Customer Connection Guide" document that has nothing to do with micro-generation generating units !!

The last 3 versions of EPCOR D&Ts "Customer Connection Guide" all have the date "Release Date: January 1, 2025 - Effective Date: March 1, 2025" on the cover and the only way that we can tell which is the latest version of it is to look at the number of appendices at the end of it !! Why they would do this seems to be quite incomprehensible !! Would they not want to facilitate their customers in giving them correct information instead of making it complex?

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

EPCOR D&T goes through a process of checking to make sure that all the submitted data is available before actually seeing whether the data is acceptable. The checking process is a third-party contract, which seems to take up most of the 14 days.

EPCOR D&T will only accept a MG Notice if it is accompanied by the electrical permit for the project. I understand why this is the case, but it adds time to the process instead of being able to be done in parallel.

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

This is an important question to ask. Even though I have indeed submitted two of Edmonton's largest large-MG PV systems (at the time), most of my projects of recent are small-MG PV systems. So I don't really have an answer to this question.

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).

incomplete information submitted or incorrectly formatted according to what the WSP wants. Incomplete, poorly described, or confusing information requirements from the WSP.

iv. Other (please explain).

I always want the PV systems that I design to be correctly and clearly designed, and so perhaps I go "overboard" in making my drawings detailed – though no-one has commented on this.

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:

I would be pleased to supply whatever information that the WSP requires. It is not hard.

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

as befits the size and type of the MG project – sure.

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.

This can easily be gamed by both the WSPs and the customers. I make detailed calculations about the PV systems that I design, and I stamp my calculations. ATCO Electric filed a dispute on one of mine, AUC Proceeding 1477, which I won because ATCO Electric didn't have a flying clue of what they were submitting (as can easily be seen).

Future upgrades can easily be described and reasonable energy consumption calculations made by engineers who have the expertise in this. Do the WSPs have any clue about all the types of consumption equipment that can be added?

It would be better that the MG Regulation or Rule 024 be changed to permit any amount of annual energy to be generated, up to the capacity of the customer's service – so then there woudn't be this continual fight over generation *vs*. consumption.

iii. Other (please explain).

how can WSPs facilitate micro-generation generating units, as per the requirements of the Public Utilities Act s. 88, instead of trying to block them?

See also AUC document 1477-28.01 -- HME Evidence of Compliance -- 243590.pdf, Section E, pages 21 to 25, paragraphs 40 to 48, and the references to the Public Utilities Act s. 88, the Electric Utilities Act s. 105(1) and the HEEA s. 2.

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.

I myself only have had one issue, as per AUC Proceeding 1477 described above because I do detailed calculations on the PV system generation, and meticulous records of the consumption.

I have heard lots of awful stories from PV installers though.

I don't think that WSPs understand solar PV system operation very well because it is not their professional specialty.

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.

thank you for asking for this input.

   a. Legislative requirements applying to microgeneration in Alberta.

yes, of course, in the Micro-Generation Regulation and the AUC Rule 024.

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

yes, I know them all very well. They are all very easy to find.

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

These are much-more difficult to find, and I try to find them before submitting any MG Noties.

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

Click or tap here to enter text.

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.)?

Click or tap here to enter text.

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.)?

Click or tap here to enter text.

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.

Click or tap here to enter text.

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.

Click or tap here to enter text.

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?

Click or tap here to enter text.

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

no, they usually don't have a clue

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

I doubt it because of the complexities and costs of the SSGR application process and re-imbursement process. This is easily seen by the AESO's monthly reports about the quantities of MG systems vs SSG systems vs DG systems.

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

Click or tap here to enter text.

Cost estimates

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

I don't know.

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?

Perhaps by the WSPs being required to describe their interconnection process and costs better, and publish their documents where MG proponents can more easily find them, and for the MG proponents needing to be able to find, read, and understand these requirements.

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?

early on using the standard Class D, C, B, and A estimates.

Technical standards

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

I don't know.

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?

I don't know.

Communication

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

   sometimes good, sometimes strained, sometimes distant, sometimes confrontational

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.

   The WSPs should make a published policy about when they will communicate with their customers about this.

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.

   good question to ask

   a. Every 14 days

      yes, at most

   b. When the project enters a new phase

      yes, especially at the very start when they receive the MG Notice, and when they receive any updated information – so that the customer at least knows that they e-mail process has been successful, and what are the next steps for both parties.

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

      yes – so that the customer at least knows that they e-mail process has been successful, and what are the next steps for both parties.

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

yes – so that the customer at least knows that they e-mail process has been successful, and what are the next steps for both parties.

e. Other

when more information is needed, and what will happen to the application and its process until when the new information is provided

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).

… and keeping in mind that residential solar PV micro-generation generating units on average generate one 13-millionth of Alberta's energy generation each (7200 kWh *vs*. 93 TWh) … so since each of these systems are so incredibly tiny, then what amount of effort do any WSPs or the AUC want to spend on them?

a. Direct emails/phone calls

e-mail can be fine, but any text-based communication (e-mail, telephone-text documents, letters, etc) contains only 30% of what us dear humans need in order to communicate well.

telephone calls should be permitted (and recorded if necessary) because sometimes text-based communication is confusing to the reader, and telephone calls can sort this out really well

b. In-person or virtual meetings

both are great, if they are not abused by the customers

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

yes, via automatic e-mail subscriptions

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

that could be fine if it is not overly complex

e. Other

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?

respect, both ways

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?

it has been done by telephone call or e-mail… however this justification in size is functionally an engineering matter, and so the reduced size **must** be communicated by a stamped engineering document from the WSP, otherwise, some poorly-trained staff person at the WSP (as I have found) who is not an engineer, and is not working under an engineer then provides the information about the sizing, but without having much of a clue as to the legislative, technical, safety or other reason why it needs to be reduced.

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

I don't know

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.

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.

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.

yes, even though I am a specialist engineer in designing and developing PV systems, I have intentionally responded to the on-line solar advertisements of 6 companies to get them to sell me on a PV system because I wanted to see what stunts they would play !! None of the companies knew of me even though I did not try to hide my name or the image of the rooftop of my house, which already had a PV system on it !!

These 6 companies were Northern PWR (the worst one), ATCO Rumi (who did nothing else but farm my request off to Kuby and eVolve), Polaron, Shift Energy from Vancouver, and UpGreen from Ottawa. Northern PWR was **absolutely** awful. I was shocked at the rubbish that they were throwing at me !! I can give you details.

yes, to friends and colleagues… Northern PWR sold a colleague in Devon a 4.05 kW PV system for $36 000 and then reduced the price to $33 000 in 2025, with a 29-page contract document consisting mainly of legal requirements. He could have purchased this for about $14 000 at most. They put the inverter in the wrong position and punched a hole in his garage, which they have never fixed.

Northern PWR also tried to sell a 3.56 kW PV system to a friend in St Albert for $41 000 with a 25-page contract document consisting mainly of legal requirements !!! She told me that she was very impressed with their sales pitch but thought to ask me what I thought and I told her to RUNNNNNNNNNNN AWAY, which thankfully she did !! She could have purchased this for about $12 000 at most.

The manger for Northern PWR comes on to Facebook groups defending his company, but without answering anyone's questions. The owner of Northern PWR wanted to meet with me to find out how to recover his company's reputation, but I declined to do this after I found that they had purchased but not paid for $400 000+ of equipment from a local distribution company !

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.

There is no on-going after-the-fact provision in the Micro-Generation Regulation for WSPs to "manage" existing micro-generation generating units that are "are out of compliance" with the Micro-Generation Regulation. Assessment of compliance with the Micro-Generation Regulation ends with the issuance of the WSP's Interconnection and Operating Agreement.

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

May I respectfully ask why the AUC is spelling "micro-generation", as "microgeneration" in this document, when the Micro-Generation Regulation itself spells it "micro-generation" 111 times and as "microgeneration" zero times.

The AUC's own Rule 024 spells it as "micro-generation" 54 times and as "microgeneration" only once (sadly) !

Would it not be better for the AUC have a policy to be consistent on this spelling and follow the example in the Micro-Generation Regulation itself?