AUC
Alberta Utilities Commission

Rule 024 engagement questionnaire

Comments from (*company/stakeholder name*):	SkyFire Energy Inc	**Contact name (*for companies*):**	David Vonesch
Date [yyyy/mm/dd]:	2026-09-08	**Phone:**	[redacted]
Role:	Customer consultant	**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.

> Timelines have varied significantly over the past ~17-18 years that the Micro-Generation Regulation has been in effect. They have varied by wires owner and system size. While owners generally work diligently to process applications in a timely manner, most or all have been overwhelmed by volumes at some point in the past 10 years and today, many are struggling to effectively resource the internal engineering work required to process applications for larger projects. This issue is compounded as owners increasingly add new interconnection requirements that they do not have the internal engineering resources to effectively process causing further delays and client frustration.
> Today, Small Micro-Generation applications are generally processed as quickly as 1 week (ex. ENMAX for simple residential projects) to 12 weeks (ex. small commercial where technical reviews are required).
> Large Micro-Generation applications (from application to detailed level study results) may take upwards of 6 months or longer. Further interconnection requirements during detailed engineering and commissioning will often cause further delays. Projects that used to be built and energized within 4 months of may now take 18-24 months to complete.

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

> Yes, projects larger than 500kW are particularly slow to connect. In particular, new requirements for 3rd party engineering and commissioning requirements (ICAP - IEEE Conformity Assessment Program) are largely (>90%) redundant with the generator's authenticated engineering design documents which are governed by APEGA and the engineering profession. The additional requirement for redundant engineering and commissioning documentation that wire owners do not have adequate resources to review and process is adding significant delay to larger projects.
>
> Further, it has been typical for some wire owners to publish new interconnection requirements every 6-12 months and then require retroactive conformance with new requirements that were not in place at the time of application. This is adding unexpected cost and significant delays to projects at great frustration to all involved. Generators need certainty on interconnection requirements at the point of investment decision.

   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 hosting capacity maps provided by wires owners are very helpful.
>
> Published technical interconnection requirements that remain fixed from the date of application. Stop the retroactive application of new requirements to existing applications.

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

Providing current and anticipated processing timelines for projects of various sizes and applications would help contractors and consultants appropriately set expectations with generation owners.

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

Streamline the interconnection process and then provide clear, guaranteed timelines for processing applications that thoughtfully consider appropriate technical interconnection requirements based on generator and distribution system characteristics – see IREC's Model Interconnection Procedures. Fast track smaller projects and projects that are close to a substation and on a main distribution line.

Minimize and remove redundant engineering and study interconnection requirements (ex. most of the ICAP requirements).

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).

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iv. Other (please explain).

Click or tap here to enter text.

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:

Click or tap here to enter text.

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

Click or tap here to enter text.

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.

Click or tap here to enter text.

iii. Other (please explain).

Click or tap here to enter text.

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.

This may still occur from time to time but is quite rare today. While we do not agree on the methods used in some cases, the methods are generally well understood.

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.

Click or tap here to enter text.

a. Legislative requirements applying to microgeneration in Alberta.

Yes

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

Yes

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

Yes

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

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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.)?

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   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?*

   Yes

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

      Improved clarity on the process and various application requirements (ex. AUC, wires owner, AESO, retailer, etc) for both industry and owners would be very helpful. Greater awareness and understanding within the distribution owners would help to avoid unnecessary delays.

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

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Cost estimates

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

   For Micro-Generation, owner costs are generally well understood. In some cases, the interconnection requirements may change which will increase generators engineering costs, construction costs and timelines.

   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?

      Certainty at the time of application of the interconnection requirements for the project.

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?

   For larger projects, the customer should be informed of the potential for extraordinary costs after the initial application review (ex. high level study (HLS) results). The detailed level study (DLS) results should then inform actual costs and possibility to avoid costs where applicable.

Technical standards

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

> Yes, given the long timelines for interconnecting a large Micro-Generation project, the standards change and some new requirements are introduced during the life of a project.

   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?

> Not information, but it would be practical and fair for the DFO to freeze standards that are in place during the initiation of a project rather than introducing new requirements part way through a project.

Communication

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

> While we have, at times, experienced significant frustration with a lack of communication between a DFO and ourselves as a customer consultant and EPC, this is generally not the case today. In most cases for larger projects, the wires owners will work to accommodate regular recurring or individually requested meetings.

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.

> For Small Micro-Generation – generally just at application acceptance. For Large Micro-Generation, weekly or bi-weekly meetings may occur to ensure all requirements are on track and to support engineering and construction coordination.

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.

> Click or tap here to enter text.

   a. Every 14 days

Yes, as a minimum standard.

b. When the project enters a new phase

This should be standard practice.

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

This should be standard practice.

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

This should be standard practice.

e. Other

Click or tap here to enter text.

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).

Click or tap here to enter text.

a. Direct emails/phone calls

Direct emails for all formal submissions and communications.

b. In-person or virtual meetings

Virtual meetings for more complex engineering discussions and regularly scheduled project planning meetings as required (ex Large Micro-Generation).

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

For the latest interconnection requirements, process/instructions, hosting capacity maps and contact information.

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

For general information on the process, customer and owner obligations, timelines, etc. Not necessary or desirable otherwise for interconnection applications unless a project or issue is disputed.

e. Other

Click or tap here to enter text.

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?

Improved clarity from DFO's on their MG resources. We find that some DFOs don't include any contact information on their emails so it feels helpless at times. Given that they are employees of regulated companies, their contact information should not be a secret.

Provide clear paths for escalation within the DFO and then the AUC where communication standards are not being adhered to (ex. no responses or communication for 2 weeks, etc).

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?

This has been communicated through email including with HLS or DLS results.

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

Generally, the discussion of options is limited to curtailment or system size reduction.

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.

   Click or tap here to enter text.

   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.

      Click or tap here to enter text.

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.

   Click or tap here to enter text.

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.

   Click or tap here to enter text.

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

   1) DFO's should provide an opportunity for feedback and discussion on technical interconnection requirements before just requiring them with zero notice and often retroactively. In our view, the industry has a lot to offer and the DFOs have a lot to gain through a more collaborative approach that considers our perspective. Interconnection timelines and costs need to be part of the discussion.
   2) Improved clarity and commitments on process, timelines are desperately needed. Customers and consultants need clear contact information and escalation points where basic communication standards are not met.