Rule 024 engagement questionnaire

Comments from *(company/stakeholder name)*:	Utilities Consumer Advocate	**Contact name *(for companies)*:**	Vahid Jafarniya
Date [yyyy/mm/dd]:	2026/09/04	**Phone:**	[redacted]
Role:	Consumer Advocate	**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 UCA has heard concerns regarding delays in the micro-generation connection process and considers that clearer and more standardized connection timelines would improve predictability for customers. Rule 024 establishes specific timelines for certain steps in the process, including the 14-day period for an owner to determine whether a micro-generation notice and supporting documents are complete, but does not establish an overall timeline for completing the connection. The Micro-generation Regulation requires certain connection-related activities to be completed within a "reasonable time," but does not specify a defined timeframe for completing the connection. The Commission should consider establishing standardized timelines for key stages of the connection process, including an expectation for completing the connection. Different timelines may be appropriate for straightforward small micro-generation projects and larger or more complex projects that require additional engineering review, system studies or system upgrades. The framework should also allow reasonable extensions where additional time is required due to project-specific circumstances or matters outside the owner's control. Where a timeline cannot be met, the customer should be informed of the revised timeline and the reason for the delay. Clearer timeline requirements would give customers greater certainty while allowing DFOs enough flexibility to address project-specific safety, reliability and system requirements.

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

> Delays may arise at different stages of the process and for different reasons, including incomplete application information, additional engineering or system studies, required system upgrades, changes to the proposed project, or outstanding actions by the customer or owner.

   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:

> DFOs should provide clear information before the start of a project on the main phases of the connection process, expected timelines, differences in requirements for small and large micro-generation projects, and common circumstances that may result in delays. Where a project is delayed, the owner

should inform the customer of the reason, any information or action required to proceed, and the effect on the expected connection timeline. Information from DFOs on actual processing times and the principal causes of delays would also assist the Commission in determining where standardized timelines or other process improvements may be appropriate.

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

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

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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:

Applicants should provide complete and accurate project information at the initial application stage, including relevant technical specifications and information supporting the proposed project size. Where the proposed size reflects planned increases in electricity consumption, reasonable supporting information should be provided for additions such as an electric vehicle, heat pump or other significant load. Applicants should also respond to requests for additional information in a timely manner and inform the DFO of significant changes to the proposed project that could affect the connection requirements or timeline.

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

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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.

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iii. Other (please explain).

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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.

Delays can arise where there is uncertainty or inconsistency in how a customer's annual consumption and the expected annual output of the micro-generation unit are calculated. The UCA supports a standardized methodology and minimum information requirements so that these calculations are applied consistently across DFOs. For existing sites, the most recent 12 months of consumption should continue to be used as the default, while allowing a customer to request a three-year average where the most recent year is not representative. The UCA also supports reasonable documented adjustments for known or planned increases in electricity use, such as an electric vehicle, heat pump, or other significant load. Clear and consistent requirements for demonstrating these changes would help reduce additional information requests and avoid unnecessary delays in determining the appropriate size of a micro-generation system.

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.

a. Legislative requirements applying to microgeneration in Alberta.

The UCA provides information on micro-generation requirements and the connection process through its Micro-generation webpage and Renewable Energy FAQs. These resources also direct consumers to the Micro-generation

Regulation, AUC Rule 024, the AUC Micro-generation Notice Submission Guideline, and other relevant guidance.

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

The UCA website provides information for farm consumers on the distinction between micro-generation and small-scale generation. These resources can assist consumers in understanding which generation option may apply to their project. Additional plain-language information comparing the different regulatory pathways for distribution-connected generation could further improve consumer awareness.

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

The UCA website provides information to help consumers identify the electricity distributor serving their area. Customers can then refer to their DFO for the applicable terms and conditions of service and project-specific micro-generation requirements.

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.)?

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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.

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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?

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

The UCA does not have sufficient information to assess the level of awareness of the Small Scale Generation Regulation among customers and micro-generation proponents. However, clear and accessible information explaining the key differences between micro-generation, small-scale generation and other forms of distribution-connected generation would assist customers and proponents in identifying the appropriate regulatory pathway before making significant project commitments or submitting an application.

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

Yes. Plain-language information on the principal eligibility differences and application requirements may help customers identify the correct process and reduce associated delays and administrative costs.

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.

Connection cost estimates may change as project design, engineering studies and other project information become more developed. From a consumer perspective, customers should understand the level of certainty associated with an estimate. Owners should clearly state whether an estimate is preliminary or final. If the estimate changes significantly, the owner should provide the updated amount and explain the main reasons for the change. Significant assumptions or uncertainties that could affect the estimate should also be identified where relevant.

   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?

The potential for avoidable changes may be reduced through the timely exchange of complete and accurate information. Owners should clearly identify the information required to prepare the estimate, while applicants should provide accurate project information and communicate significant project changes that could affect connection requirements or costs. This would improve cost predictability for customers while recognizing that some refinement of estimates may be unavoidable as engineering and project information develops.

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?

The customer should be informed as early as reasonably practicable once the owner has a reasonable basis to believe that extraordinary connection costs may be required. The customer should not have to wait until the cost estimate is finalized. At that stage, the owner should explain, to the extent known, what is giving rise to the potential extraordinary costs and make clear that the amount remains subject to further engineering assessment and, where applicable, Commission review under Sections 4(3) or 4(3.1) of the Micro-generation Regulation. Significant developments affecting the potential costs should also be communicated to the customer. Early notice is important because the possibility of extraordinary costs may affect the customer's decision regarding project size, design, technology or whether to proceed. Providing this information early helps customers make informed decisions before committing further to the project and reduces the risk of unexpected costs.

Technical standards

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

   Technical standards and interconnection requirements can change over time. Where a revised requirement applies to an application already in progress, the owner should clearly identify the new requirement, its effective date, and any resulting changes to the project's connection requirements. If the requirements change, it should be clear how the changes apply to projects already underway.

   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?

      To reduce uncertainty, the applicable technical requirements should be identified early in the process. DFOs should provide clear information on the technical standards and interconnection requirements that apply to the project, including any known upcoming changes that may affect the connection. The UCA also supports an AUC-facilitated technical working group, or similar industry coordination mechanism, to help keep AUC guidance and utility interconnection requirements aligned with evolving technical standards.

Communication

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

   Click or tap here to enter text.

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.

   Click or tap here to enter text.

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.

> Project updates should generally be provided when there is a significant development or when action is required, rather than at a fixed interval for every project. This event-based approach would provide customers with meaningful and timely information while avoiding unnecessary administrative costs associated with mandatory updates at a fixed interval. The same communication principles should apply to both small and large micro-generation projects. However, larger or more complex projects may require more frequent updates where they involve additional stages, studies or technical requirements.

   a. Every 14 days

   > The UCA does not consider a mandatory 14-day update appropriate for every project. Updates should generally be driven by significant developments or required actions.

   b. When the project enters a new phase

   > Yes. Customers should be updated when the project enters a significant new phase, so they understand the status of the application and the next steps.

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

   > Yes. Customers should be informed when new information may affect the project's design, cost or expected connection timeline.

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

   > Yes. Where information or action is required from the customer, the owner should clearly identify what is required and explain how a delay in responding could affect the application.

   e. Other

Where a project remains unresolved for an extended period without a significant development, a periodic status update should also be provided so that the customer is not left without information about the application.

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).

The most effective communication method should depend on the type and complexity of the information being exchanged. Communication should provide customers with timely access to necessary information while maintaining an appropriate record and avoiding unnecessary time and administrative costs for customers and DFOs.

a. Direct emails/phone calls

Email is generally appropriate for project-specific information because it provides a clear record for both the customer and the DFO. Phone calls may also be useful where an issue requires further explanation, with important decisions, information requirements or agreed next steps documented afterward.

b. In-person or virtual meetings

In-person or virtual meetings may be useful for complex technical or project-specific issues that are difficult to resolve through written communication. They should generally be used where needed rather than as a routine requirement, given the additional time and resources involved.

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

DFO websites are appropriate for general information that applies to multiple applicants, such as application requirements, process changes or updated technical requirements. This information should be kept current and readily accessible to customers and proponents.

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

A centralized source, such as the AUC website, would be useful for information that applies broadly across Alberta, including applicable rules, regulatory

requirements and general guidance. This could help improve consistency and make it easier for customers to identify current regulatory information.

e. Other

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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?

In addition to the communication measures identified above, clearer identification of outstanding issues and next steps could improve the connection process. Where additional information or action is required, the communication should clearly identify what is required, which party is responsible for the next step, and, where applicable, when a response is needed. This would help reduce unnecessary back-and-forth and avoid delays caused by uncertainty about how an application should proceed.

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?

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

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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.

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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.

The UCA is aware of consumer complaints regarding unsolicited door-to-door sales of solar systems. Concerns have included allegations of high-pressure or misleading sales practices and potential consumer financial losses. The UCA supports appropriate consumer protections for unsolicited door-to-door sales of solar systems, particularly given the significant financial commitment associated with these projects.

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.

The UCA has received complaints from consumers regarding the length of time required to connect micro-generation projects with their utility providers, as well as concerns regarding the overall application process. These complaints indicate that connection timelines and the predictability of the application process are important issues for consumers. Clearer expectations regarding application requirements, responsibilities and expected timelines could help address these concerns. Greater consistency and standardization across DFO service areas could also improve the customer experience. Customers pursuing similar micro-generation projects should, to the extent practicable, have consistent expectations regarding application requirements, project sizing, connection timelines and communication throughout the process. At the same time, DFOs should retain appropriate flexibility to address project-specific engineering requirements and distribution system conditions where necessary for safety and reliability. Rule 024 establishes timelines for certain steps in the application process but does not establish an overall connection timeline. Consideration could be given to establishing standardized timelines for key stages of the connection process,

with reasonable flexibility where additional engineering review, system upgrades or other project-specific circumstances require more time. Where an expected timeline cannot be met, the customer should be informed of the reason for the delay and the revised timeline.

Classification: Protected A