AUC
Alberta Utilities Commission

Rule 024 engagement questionnaire

Comments from *(company/stakeholder name)*:	Vince Wallwork	**Contact name *(for companies)*:**	Vince Wallwork
Date [yyyy/mm/dd]:	2026/08/18	**Phone:**	[redacted]
Role:	Microgen Customer/Proponent	**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.

> I am in the process of trying (for over one year) to get a microgen agreement for a 22kw CHP unit. The timelines indicated (and from my consultants past experience) were measured in weeks, but Fortis behaviour and requirements have changed from past and it has been dragging out for months and months with no end in in site. I Started the process in September (Sept 15th) of 2025 with an application received and project number assigned. It is now nearly September 2026 and we are still trying to meet the constantly evolving requirements of Fortis for the submission to be approved.

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

> Delays are excessive, I have been waiting for 11 months trying to meet (via consultant/microgen CHP unit vendor) Fortis continuous "hoops" to get an approval with no success yet. Requirements from past approvals are changing with no clear description of what is actually required to meet their documentation needs, they have repeatedly said they don't approve my submission because they disagree with some aspect, only to change their mind after repeated communications, and escalation to engineering professionals within Fortis. Any errors or omissions raised by Fortis (there is no clear documentation of what they require, in detail, up front) are brought forth one by one, and then weeks pass between resubmission or additions, it comes across as a delay tactic. In short, Fortis comes across of unsupportive of microgen installations and make the process as difficult and time consuming as they can.

   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:

> YES! They need a comprehensive flow chart of requirements (the one provided is simplified) as well as detailed description of the documentation, testing results and what is required to submitted as sealed engineering documents (this seems to be a new requirement) up front. In addition, Fortis has repeatedly stated that the size of the unit is to large, even though its sizing is backed by engineered documents and their position is not supported by AUC documents or past decisions related to sizing. Much of their communication is "Fortis interpretation" of the acts and regulations or quoted internal rather than AUC documentation that is not supported in the regulation.

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

> I'm not aware of any minimum timelines, from my experience Fortis can drag things out as long as they want and short of taking a dispute to AUC there is not recourse. They seem to find some small error or "new" requirement that are brought up one at a time to drag things out.

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

NA

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).

All of the above, delays of weeks for a response, errors identified long after submission a that was accepted as complete causing rework multiple times, seemingly new requirements, certain people in the organization denying application due to some objection, only to be overturned by escalation within Fortis.

iv. Other (please explain).

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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'm sure there is, but guessing what FORTIS wants if impossible, FORTIS needs a clear, detailed, time constrained process that should be vetted and approved by AUC.

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.

The issue is even if this is provided, FORTIS disputes it or says it does not meet the regulation (but only quotes internal Fortis interpretation not actual regulation documents).

iii. Other (please explain).

IMPORTANT! This is a critical point with respect to CHP units. Combined heat and power to meet the regulation objective of low greenhouse gas emissions must be engineered to both meet power AND

HEAT requirements of the property. In my case the heat load is higher for a significant portion of the year (winter) than the power requirement. This needs to be recognized in the sizing criteria and acceptance. In my case the there will be times when I need to export extra power during cold periods (winter months) in order to generate enough heat for my home, if the unit is sized on the "average for the year" (Fortis position) I would have to install an entire supplemental heat source as make up. This will add substantial extra cost and defeat the purpose of an efficient, low emissions, CHP unit design. In addition Fortis gives no credence to any future need (electric car charger), only to past historical loads without SUBSTANTIAL pushback and lobbying.

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.

Almost all of Fortis objections, pushback or obstructionism is related to this aspect of the regulation. The regulation does not say anything about "more than" and its not worded as a "restriction" the intent here needs clarification. That being said, Decision 2012-103 seems to support the sizing being "restricted" to the size of the service, which I think is a good basis. Please also consider that in the application of CHP units, ENERGY CONSUMPTION includes heat and power, so pure electrical size should take this into account.

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, but intent and interpretation are not always clear.

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

Yes aware, generally clear

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

Not aware and not clear

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.

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      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?*

   I would say generally yes, via their employed consultants/retailers of microgen equipment.

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

      No, unless it clarified intent and basis requirements in more and specific detail.

   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.

   Not in my experience other that the delay and long timeline (11 months and counting) have incurred significant cost in interim heat solutions while waiting for my CHP to be approved.

   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?

      Click or tap here to enter text.

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?

   Within initial review of the first submission (2-3 weeks)

Technical standards

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

Not in my experience

   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?

Specific UL/CSA standards particularly in terms of safety control (trip/disconnect conditions) or approved/accepted controllers.

Communication

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

The principle issue is the disagreement between the wires owner (Fortis) and the chp retailer/customer proponent on the intent and interpretation of the regulation with respect to size of units. This needs to be clarified for all parties and this single item will resolve almost all of the conflict that is creating the delay.

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.

Click or tap here to enter text.

   a. Every 14 days

Yes

b. When the project enters a new phase

Yes

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

Yes

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

YES

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).

Emails exclusively so there is a paper trail and documentation

a. Direct emails/phone calls

Click or tap here to enter text.

b. In-person or virtual meetings

When required to resolve detailed issues.

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

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

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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?

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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 was the communication: "We've received your micro-generation application submission and have completed an initial assessment of your application to install Combined Heat and Power (CHP) units. This email is to update you with respect to the sizing requirements for micro-generating units under the Micro-generation Regulation, Alta Reg 27/2008 (the Regulation) and our adjusted engineering assessment of the sizing of CHP units. Our review has concluded that the applied-for CHP units do not meet the sizing requirements as set out in the Regulation. CHP units on the FortisAlberta distribution system are capable of, and have been observed to often be, operating at or near peak export levels continuously (24 hours a day, 7 days a week, 365 days a year). Because of this characteristic of CHP units, and to remain compliant with the sizing requirements in the Regulation, FortisAlberta has adopted an 8760-hour assessment approach (representing all hours in a year) to better reflect actual operating conditions and CHP unit export capability. Based on this updated methodology, your application does not meet the sizing criteria as defined under the Regulation. Therefore, we are unable to proceed with the application in its current submitted form. At this time, you may choose to:Withdraw the current application, orRevise the system size to a maximum of 4.46 kW, which would bring it into compliance, orProvide supporting documentation sealed by a Professional Engineer certifying the proposed duty cycle. We are happy to discuss the above details further. This update to our engineering assessment reflects the application of regulatory requirements to ensure fair and consistent processing of all applications and the responsible integration of distributed energy resources."

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

This size reduction proposal is based on the FORTIS preferred interpretation of the regulation and as stated is an INTERNAL Fortis methodology. The regulation in its actual text, although quoted says no such thing regarding this interpretation. Like stated previously the intent and interpretation of the regulation needs to be clarified on this aspect and perhaps amended to account for the specific properties of CHP units in their engineering sizing to account for heat and power demands of the application.

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.

No

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.

Summary: clarity on sizing, going back to the governments intent regarding microgeneration size/capacity when the regulation was enacted. This needs to be reconciled with all parties with a clear, communicated basis for all to move forward on, this is the main cause of "delay" in the Microgeneration application and approval process. In addition, specific sizing criteria need to be established for CHP units to account for the dual role of both electrical power and property heat requirements that will inform the sizing to best maintain efficient operation and balanced capital and operating cost. FINALY: Return on capital should be considered as well and I don't believe it is in the current/ongoing disagreement on sizing of units. A CHP unit cost upwards of $100K to install, it is 10's of thousands for a solar PV system. In the case of a CHP unit if the unit is restricted to just the minimum average power consumption of a site, the monthly costs are not that different than grid supplied power plus gas for heat. There is no incentive to put up the capital for a CHP unit, even though having distributed generation is good for grid resilience and good for lowering the provinces greenhouse gas emissions, and is clearly intended in the regulation intent. Some amount of excess generation should be allowed to recover capital investment. The amount of power and level of compensation is worth discussion but to ignore this puts microgen proponents at a disadvantage to any other for profit generation entity. I believe FORTIS main objection to microgen applications and the delays they

introduce are a passive protest of microgen proponents “making money.” The province clearly introduced the microgen regulation to promote microgen in the province. The formula of compensation using pool power funds at a higher microgen rate were part of that and intended to provide the required economic stimulus to promote the desired outcome of a robust microgen component to the Alberta Grid. This should not be lost in the determining of appropriate sizing criteria, particularly for CHP which have different economic fundamentals that solar. Lastly, care should be taken to consider the past precedent set by the owners of the grid’s, by “changing the rules” as they have relating to interpretation of CHP sizing to “annual average” they will advantage past microgen agreement holders over present and future applicants. Conversely if interpretations and sizing criteria are updated and retroactive (to be fair) to all microgen holders that will negatively impact past microgen customers.