AUC
Alberta Utilities Commission

Rule 024 engagement questionnaire

Comments from ***(company/stakeholder name)*****:**	Western Solar Inc.	**Contact name** ***(for companies)*****:**	Lewis Marshall
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Role:	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.

> [Small MG]: Administration timelines - i.e. processing application for completeness, validating production vs consumption, etc – are around 3 weeks. DFO engineering timelines are generally not defined, projects can remain in engineering review for an extended time (some projects upwards of 6 months) with little direction on what specifically is delaying the application and an estimated timeline to completion. [Large MG]: projects experience extended delays related to engineering reviews/studies, including those performed by the DFO (i.e. production of a Detailed Level Study (DLS)) and those related to the DFO's technical requirements.

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

> Overall, there have been significant timeline improvements on processing timelines on Small MG applications. The implementation of online application submissions has significantly increased visibility into application statuses. However, recently (within the past several months) many small MG applications were delayed due to the DFO performing additional engineering checks (specifically related to voltage rise). These delays were not communicated until we reached out for an explanation; we were not provided with timelines. The delays lasted for a several months and were in far greater excess than typical timeframes.

   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:

> DFO can explain the stages of reviews (including engineering reviews), including approximate timelines. Explanation of why specific reviews (e.g. voltage rise, aggregate DLS) are required would be very helpful to explain extended timelines to customers.

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

> Explanation of the criteria that necessitates additional engineering reviews, approximate timelines of these reviews, and any measures we can take to avoid these reviews (e.g. install different equipment types, provide additional documentation, etc.)

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

Large MGs undergo a DLS process which takes months to complete. We understand why these larger projects require engineering consultation (i.e. completion of a DLS); however the DFO will at their own discretion 'aggregate' multiple small MG applications together for engineering review including producing a DLS. It is unclear what the criteria/threshold for this is.

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).

As above, guidelines on criteria that would increase engineering review requirements (e.g. voltage assessment, DLS) and timelines. An explanation at the outset of what reviews would be required and associated timelines.

iv. Other (please explain).

The need for 150kW projects to be classified as 'Small Microgen': other jurisdictions include 150kW under their version of 'small microgen'. Due to standard inverter sizes (e.g. 50kW, 75kW) classifying 150kW sites as small microgen would allow our customers to maximise their equipment.

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.

Experience suggests that there are sometimes conflicts between the DFO metering department consumption data, and the DFO internal data used to review the application. This results in applications returned as incorrect, extending application processing timelines.

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?

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?

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

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

Click or tap here to enter text.

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.

Yes, some requirements are only discovered after receipt of a Detailed Level Study (DLS) from the DFO.

   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?

A tool or app of sorts to give a high-level estimate would be very useful, e.g. enter a SiteID and proposed generation size, and it would suggest approximate requirements and costs. Importantly, it would indicate if the system has capacity to host the proposed generation.

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?

Small MG: during application review (after admin review). Large MG: Ideally during the DLS stage, but no later.

Technical standards

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

In our experience past large MG projects have been subject to sudden and substantial requirement changes due to apparent fast changing technical interconnection requirements. Though it is recognised these do not fall under the regulation's/rule 24's definition of 'extraordinary costs' they add substantial costs to the customer in the form of additional engineering studies, equipment, and lost generation revenue.

   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?

A 'heads up' on incoming standard changes, including details regarding what projects in what stages will be grandfathered, would be beneficial. DFOs appear to already be taking this approach by publishing draft standards and making clear the intended enforcement time.

Communication

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

Small MG: it has been difficult to get explanations on decisions (technical, process, etc) and timelines. Large MG: the DFOs have begun deploying dedicated Large MG project managers that have proved invaluable.

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.

Large MG: DFO engages in weekly meetings when requested and necessary. Small MG: we do not typically receive updates on what sub-stage the application is in; we know when an application in in 'admin stage', 'engineering review stage', however do not receive timelines or details. Efforts to communicate with the DFO on timelines have been met in the past with delayed or no response.

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

Click or tap here to enter text.

   b. When the project enters a new phase

Yes – already received in online submission portal

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).

Click or tap here to enter text.

a. Direct emails/phone calls

Helpful for speed and being able to explain a particular customer/project's situation, however lack of written communication from calls can prove difficult if there are disagreements later on.

b. In-person or virtual meetings

Helpful to ensure all parties are performing their duties to move projects along.

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

Very helpful for general information, not project specific challenges

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

Very helpful for general information, not project specific challenges

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?

Better understanding of engineering processes (what studies are required under what circumstances) and associated timelines

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 is generally communicated after the full review, which for Large MG's is after a ~6 month DLS process. For Small MGs, this takes place after all reviews are completed, which as noted above can sometimes take a long time due to unexpected engineering reviews (e.g. voltage rise assessment).

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

Projects have generally required inverter de-rating, which is challenging as de-rating requires us to purchase equipment prior to receiving DFO approval, exposing us to risk of purchasing equipment for a project that may not receive DFO approval.

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.

   Revision to the Regulation and/or Rule 24 to include 150kW system as small Mg (i.e. large MG beings at 151kW+). This would both align with other North American jurisdictions and allow small MG customers to best maximise their equipment.