Rule 024 engagement questionnaire

Comments from *(company/stakeholder name)*:	City of Red Deer	**Contact name *(for companies)*:**	Ran Li
Date [yyyy/mm/dd]:	2026/09/03	**Phone:**	[redacted]
Role:	DFO	**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 ones typically can be quickly approved within 2 weeks after all the necessary information have been obtained. Big ones require studies and more engineering assessment depending on the customer's proposed system, so the information required to grant approval is not available until more collaboration and information gathering with the customer. Because of the complexity of larger projects, the final approval is usually not possible until a design is completed that addresses all the safety issues such as islanding. It could take months for the complete design to emerge. Ultimately approval cannot be granted without firming up such details – design must first be finalized and must satisfy all safety requirements.

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

> Main contributing factor is customer not forthcoming with information necessary to make an assessment on the application, sometimes resulting in extensive turn-around over multiple emails – mostly related to the technical aspect of the proposed design.

   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:

> We believe a customer engineer, either in house or contracted, should interface with the DFO due to the nature and complexity with some of these proposed designs. This should help with unexpected delays as the engineer with subject matter expertise can help the customer understand what the DFO is asking for – we as the DFO cannot perform the dual role of both approver and designer.

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

> Yes, this should help to provide transparency and managing expectations.

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

> Yes, this should help with managing expectations.

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).

Yes, this should help with managing expectations of the customer and provide some useful information on how to move things forward with minimal delay.

iv. Other (please explain).

On some projects we've experienced delays from the customer challenging the reasons we provided for the extraordinary costs and additional safety requirements, citing that the legislations do not prescribe the safety requirements verbatim.

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:

More complete, accurate information about the project would help.

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

Yes, this will help

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.

Yes, this certainly should help if the proposed MG's annual production is very close to or exceeding 100% consumption offset.

iii. Other (please explain).

Potentially the customer could be more forth coming with future upgrade plans as well as possible alternative designs in mind. More information means that there would be less surprises and delays.

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.

Only a minority of applications are linked to this problem, but they create a disproportionate amount of delays. These usually takes several emails and a lot of turn-around to resolve, and most of the times the additional evidence provided is not sufficient, so the customer would end up redesigning for a lower nameplate capacity, anyway.

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.

Not applicable to us as DFO

   a. Legislative requirements applying to microgeneration in Alberta.

Not applicable to us as DFO

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

Not applicable to us as DFO

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

Not applicable to us as DFO

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

2 customers within our service territory so far fall under the "large" category.

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.)?

None

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.)?

None has been canceled this way so far.

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.

We have too few examples to be able to provide feedback on this question.

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.

We have too few examples to be able to provide feedback on this question.

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?

We have too few examples to be able to provide feedback on this question.

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

We feel the customer awareness for Small Scale Generation in our service territory is fairly low.

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

We don't have any examples that would shed light into this issue.

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

No.

Cost estimates

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

To avoid this, we would provide ballpark estimate in the beginning, since final costs would not be available until later but we want to manage customer expectation with a budgetary estimate.

   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?

Better and more complete technical information about the project would help with this issue.

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?

As early as possible. Delayed notification of this issue could potentiality result in wasted manhours on both sides, as the value proposition may change enough to cause project abandonment.

Technical standards

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

No, new standards outlined in AESO whitepapers and subsequently implemented by DFO's have a delayed implementation timeframe, so in-flight projects are usually not impacted.

   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?

Less overall delays mean less likelihood that a project can be impacted by technical standards changing. If the project is delayed significantly, then it may end up being subject to newer standards before completion, even though the adoption of new standards typically have a 1-year delayed implementation plan.

Communication

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

> Overall communications are responsive with quick turn-around if the customer/consultant knows the Microgen Framework and applicable standards/statutes and have the required information ready. The ones that end up taking up a lot of time are the ones where the applicants are not familiar with the various aspects of technical and legislative requirements. In those cases, we go as far as providing a crash course on the broad subject matter, but we can't help them do a full design. Sometimes the customer bought equipment before making the application and have trouble providing evidence that the equipment meets specifications – those tend to take up a lot of back-and-forth emails.

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 ones we typically provide email communication at significant milestones or hurdles, such as missing documentation, application approval or non-approval (such as nameplate capacity exceeding limits). For big ones we work closer with the consultant/applicant like a capital project – providing updates as part of the project management meetings.

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.

> Updates should consist of information that's material and significantly related to the progress of the project, we don't see a lot of value in providing updates just for the sake of providing updates.

   a. Every 14 days

   > We don't see a lot of value in providing updates on a fixed time frame.

   b. When the project enters a new phase

   > Yes, this is a good time to update the customer

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

Yes, this is necessary to properly manage the project and the expectation of the customer

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

Yes, this has material impact on the project, and the customer needs to be updated

e. Other

Sometimes a customer application would become stale-dated where customer decided not to proceed even after obtaining approval. We don't usually send out any communication updates/reminders to let them know that their approval will expire, as it usually means that the customer is no longer interested anyway.

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).

We prefer normal business communications - email, calls, meetings, etc.

a. Direct emails/phone calls

Yes, we have so far been able to adequately and timely address concerns using this direct method with the existing staffing level

b. In-person or virtual meetings

For bigger, more complex project, we prefer meetings due to the number of stakeholders involved and the ability to address all parties' concerns.

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

We update our webpage when new standards are being implemented to give advanced notification prior to implementation

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

This method requires resources to develop and maintain and given the volume of applications we receive we don't believe it's cost effective.

e. Other

We also provide additional stakeholder engagement by talking to our bigger customers to find out their future expansion plans and discuss with them high level feasibility and potential hurdles.

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?

We believe the existing communication method is fine, but sometimes the right people are not being engaged, or the information is not getting passed onto the right people timely – we are mostly referring to scenarios where an experienced engineer should be acting as the client contact which would minimize delays quite a bit. We understand the desire for customers to save costs by delaying engineering involvement, but it ends up costing time.

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?

After assessing the application to have exceeded allowable nameplate capacity for the above stated reasons, an email communication is used to update the customer about the reason and next course of action.

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

The customer is given an option to modify the design with reduced nameplate capacity.

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.

Communication should be provided upon new information that has material impact to the progression of the project, such as upon inadequate documentation or insufficient evidentiary support for future load increases intended to justify a larger nameplate capacity.

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.

> We believe managing customer expectations are sufficient. Between the relatively fast turn-around time on assessment of small projects, and the more hands-on active project management of big projects, the customer is already receiving timely feedback on their project. Any additional updates in between would have questionable value in our opinion.

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.

> As a resident living in the same city, I have had solar company business cards slipped under my door, which coincided with my ring camera recording that a sales rep tried to knock on the door, presumably to engage in a sales pitch.

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.

> We do manual monitoring by using available meter data. As with other DFO's, we do use meter data to verify various non-compliance issues such as possible power theft, interconnection of additional generation without prior approval, etc.

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

> We believe as DER's becoming more saturated, which triggers more safety issues, customers should expect more extraordinary costs and longer turn-around for their projects, especially the big ones.