Rule 024 engagement questionnaire

Comments from *(company/stakeholder name)*:	Utility Network & Partners Inc.	**Contact name *(for companies)*:**	Darren Chu
Date [yyyy/mm/dd]:	2026/08/26	**Phone:**	[redacted]
Role:	Competitive electricity retailer	**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.

> As a retailer, we are not directly involved in the DFO's technical connection and approval process and therefore cannot comment on overall connection timelines. Our experience primarily relates to the time between completion of the connection process and a site's designation as microgeneration changing from "No" to "Yes." We have observed this taking anywhere from a few days to four weeks or longer. This information is largely anecdotal, as we do not currently track DFO processing times and generally become aware of delays through customers or solar proponents.

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

> Yes. Our experience primarily relates to delays in a site's designation as microgeneration after the connection process. These delays can affect the retailer's ability to appropriately enroll or administer the customer as a microgenerator and may delay the customer's access to microgeneration-specific retail rates or programs. As a retailer, we generally have limited visibility into where a project is within the DFO's process or the cause of a delay.

   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:

> As this process does not directly involve us as a retailer, we can only assume that timelines are being conveyed to solar installers about how long the process might take. Solar installers, in turn, should be communicating those timelines to microgenerators directly.

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

> Yes. General information about each phase, expected processing timelines, and circumstances that may extend those timelines would be helpful. Where possible, DFOs should publish service standards or typical processing ranges rather than minimum timelines alone.

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

> Yes. Where the connection process, information requirements, technical review or expected timelines differ materially between small and large microgeneration, those differences should be clearly identified.

This would allow customers and proponents to understand the requirements applicable to their project before submitting an application.

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. Identifying common causes of delays, incomplete applications and circumstances that may restart or extend a phase would help proponents submit complete applications and establish realistic expectations for customers. Where possible, DFOs should distinguish between delays resulting from incomplete customer/proponent information and delays resulting from DFO review, technical requirements or system constraints.

iv. Other (please explain).

DFOs should provide clear, standardized application requirements, checklists and technical guidelines so that solar proponents can determine whether an application is complete before submission. Requirements should be readily accessible and, where differences between DFOs are necessary, those differences should be clearly identified.

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:

Clear and complete application requirements should reduce delays attributable to incomplete or insufficient submissions. Requirements should be readily accessible and communicated consistently so proponents understand what information is required before submitting an application.

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

As a retailer, we are not in a position to assess whether proponents currently provide sufficient technical information. However, DFOs should clearly identify the technical information required for an application to be considered complete and should avoid introducing additional requirements later in the process unless they arise from project-specific circumstances that could not reasonably have been identified initially.

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. The treatment of planned future electricity consumption should be consistent across DFOs. Customers should be permitted to substantiate reasonably foreseeable increases in consumption, including electric vehicles, heat pumps, electrification of existing appliances or equipment, and other identifiable changes in load. The Commission should consider establishing consistent evidentiary

requirements for demonstrating future consumption rather than leaving individual DFOs to establish materially different standards.

iii. Other (please explain).

Consideration should be given to developing greater consistency in application information requirements across DFOs. While technical requirements may legitimately differ between distribution systems, customers and proponents would benefit from a common baseline application standard, terminology and documentation requirements.

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.

In our experience, this is a recurring source of delay and uncertainty. Customers often want to size a solar installation to accommodate reasonably foreseeable increases in electricity consumption, particularly the addition of electric vehicles, heat pumps or other electrification measures. Requiring historical consumption to demonstrate load that does not yet exist can create a circular problem: the customer may need to increase consumption before being permitted to install generation intended to serve that consumption. We recommend that the AUC establish consistent criteria across DFOs for recognizing reasonably foreseeable future consumption. Customers should be able to substantiate future load using reasonable evidence, such as equipment specifications, purchase or installation documentation, or other objective evidence, without necessarily requiring a full year of historical consumption after the new load has been introduced.

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.

Click or tap here to enter text.

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

Click or tap here to enter text.

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

Click or tap here to enter text.

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.

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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?*

In our experience, general awareness among residential microgeneration customers is limited. Customers typically approach solar installations with the expectation that the project will qualify as microgeneration and may have little reason to investigate alternative regulatory classifications.

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

Greater awareness may be helpful in explaining alternative regulatory pathways where a proposed project does not qualify as microgeneration. However, we do not believe awareness alone would materially address the application delays we have observed, which more commonly relate to DFO processes, system sizing requirements and communication between parties.

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.

As a retailer, we do not have sufficient visibility into DFO connection cost estimates to comment on how frequently or why they change during the connection process.

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?

We are not in a position to comment on the technical information required to improve the accuracy of DFO cost estimates. However, where an estimate is preliminary, customers should be clearly informed of that

fact, the factors that could materially change the estimate, and when a more definitive estimate is expected.

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 reasonably possible. A customer should be informed as soon as the DFO identifies a reasonable possibility that extraordinary costs may arise, even if the final amount has not yet been determined. The customer should be provided with the estimated amount or range, the basis for the potential charge, any material uncertainty associated with the estimate, and when a finalized estimate is expected. Early disclosure is important because extraordinary connection costs may materially affect a customer's decision to proceed with a project.

Technical standards

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

Click or tap here to enter text.

   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?

Click or tap here to enter text.

Communication

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

Based on our experience as a retailer, communication concerning the connection process generally occurs between the DFO and the solar proponent or installer, with limited direct communication between the DFO and the customer. This can leave customers dependent on their installer to understand project status, outstanding requirements and the reasons for delays.

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.

In our experience, customers generally receive project status information through their solar proponent or installer rather than directly from the DFO. We have limited visibility into whether DFOs independently provide status updates to customers and limited experience with large microgeneration projects.

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.

Customers should receive meaningful status updates at key milestones, when action is required from them, when anticipated timelines materially change, and when new information may materially affect the project. Technical communications may continue directly with the solar proponent or installer, provided the customer receives sufficient information to understand the status of their project.

a. Every 14 days

A 14-day update may be appropriate where a project remains in the same phase without other communication. However, milestone and exception-based updates may be more useful than requiring communications at a fixed interval where there has been no material change.

b. When the project enters a new phase

Yes. Customers and proponents should be notified when a project enters a new phase. These notifications could be automated and should identify the current phase, any action required, and the expected next step.

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

Yes. This should be communicated promptly where the information could affect project design, cost, eligibility or timing, together with an explanation of the impact and any action required.

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

Yes. Customers and proponents should receive reasonable advance notice where failure to respond may result in information expiring, an application being closed, or a phase of the process needing to be restarted. The communication should clearly identify the required action and deadline.

e. Other

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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).

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a. Direct emails/phone calls

Email should generally be the primary method for project-specific communications because it provides a written record and allows customers and proponents to review technical information at their own pace. Telephone communication can supplement written communication where clarification is required, but material decisions, requirements or changes discussed by telephone should subsequently be confirmed in writing.

b. In-person or virtual meetings

This would be difficult to achieve on a consistent basis and is likely unnecessary.

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 requirements, process descriptions, forms, expected timelines and system-wide information. They should supplement rather than replace direct communication about a specific customer's application.

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

A centralized AUC resource could be valuable for information that should be consistent province-wide, including legislative requirements, definitions, general process information and common baseline requirements. DFO-specific technical requirements and project-specific status information should remain the responsibility of the applicable DFO.

e. Other

Where feasible, automated application-status portals or notifications could provide customers and proponents with basic information such as application received, application complete, technical review underway, additional information required, approved, and connection/designation completed. Automation could improve transparency without requiring significant additional staff resources.

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?

> More consistent and transparent communication would likely improve outcomes. In particular, customers and proponents should know when an application has been received and deemed complete, its current stage, whether additional information is required, the reason for any material delay, and the next expected milestone. Automated status notifications could provide much of this information without materially increasing DFO administrative requirements.

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?

> In our experience, this information is generally communicated by the DFO to the solar proponent, who then communicates the required reduction to the customer and may need to prepare a revised system proposal. Where a reduction is required, the rationale should be clearly documented so that both the proponent and customer understand whether the reduction results from legislative requirements, technical limitations, safety considerations or another reason.

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

> We do not have sufficient visibility into these discussions to comment on the options typically presented to customers.

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.

   As a retailer serving microgeneration customers across multiple distribution service areas, we believe greater consistency, transparency and communication would improve the customer experience and reduce avoidable delays. While legitimate technical differences exist between distribution systems, customers and solar proponents would benefit from greater consistency in baseline application requirements, treatment of reasonably foreseeable future consumption, terminology, expected processing timelines and status communications. In particular, we encourage the Commission to establish consistent principles for recognizing future electricity consumption associated with electrification measures such as electric vehicles and heat pumps. We also encourage greater transparency between completion of the DFO connection process and designation of a site as microgeneration, as delays during this period can affect the retailer's ability to appropriately administer the customer as a microgenerator. Wherever possible, standardized requirements and automated status communications should be used to improve transparency without creating unnecessary administrative burden for DFOs.