Rule 024 stakeholder comment matrix

Comments from *(company/stakeholder name)*:	Boreal Energy Solutions Edmonton	**Contact name (*for companies*):**	Jordan Forsythe, President
Date [yyyy/mm/dd]:	2026/07/30	**Phone:**	[redacted]
		Email:	[redacted]

Instructions:

1. Please download this document, save as "**Rule 024 matrix**" and fill out the demographic/contact information above.
2. Please review Bulletin 2026-10 and the blackline document for Rule 024: *Rules Respecting Micro-Generation.*
3. Please comment on the proposed information requirements below, including whether you agree that these information requirements should be included in an application under Section 4(3) or 4(3.1) of the *Micro-generation Regulation*. Please explain your position.
4. There are two open-ended questions included at the end of the document, including an opportunity to provide any additional information requirements that you believe should be included.
5. You can submit comments on as many or as few of the proposed changes as you wish. Blank boxes will be interpreted as neutral/favourable.
6. If a change from the blackline documents does not appear in the table below, it is considered administrative. You may provide comments on administrative changes in the general box at the end, if necessary.
7. While not all suggestions can be implemented, all relevant comments will be fully reviewed and considered.
8. Submit your response to engage@auc.ab.ca. In the email, please include the following subject line: **Rule 024 engagement**.

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Please review Sections 4(3) and 4(3.1) of the *Micro-generation Regulation:*

Connection and operation

4(3) Where in the opinion of the owner, concurred in by the Commission on application by the owner, the costs of connecting a particular micro-generation generating unit to the interconnected electric system are extraordinary, due to safety considerations, technological complexity or any other reason, the owner may require that the micro-generator directly reimburse the owner for the extraordinary portion of the costs.

(3.1) Where a micro-generator has changed the nameplate capacity of a micro-generation generating unit that is connected to the interconnected electric system and, in the opinion of the owner, concurred in by the Commission on application by the owner, the costs of maintaining the connection of the micro-generation generating unit to the interconnected electric system are extraordinary, due to safety considerations, technological complexity or any other reason, the owner may require that the micro-generator directly reimburse the owner for the extraordinary portion of the costs.

Rule 024: New Section 6(2) **2) An application under Section 4(3) or 4(3.1) of the *Micro-generation Regulation* must include the following information requirements. If any of the below information is not available, the owner must explain why.**		
Category	**Proposed wording**	**Stakeholder comments**
Description of costs	c) A description of each cost, or portion of each cost, necessary to connect the micro-generation generating unit to the interconnected electric system which is, in the opinion of the owner, extraordinary. (i) Include the item or category of items associated with each cost. The item or category of items may include, for example, specific equipment, equipment upgrades, studies, or protective devices. (ii) For any equipment upgrades, please indicate if existing equipment will be salvageable. If yes, please ensure the salvage value of the existing equipment is deducted from the extraordinary costs. If there is a reason why the salvage value should not be deducted from the extraordinary costs, please	Boreal Energy Solutions supports this requirement. Itemization is the foundation of any meaningful review, and our experience shows why it matters. On one of our applications (SMG-06661), an infrastructure upgrade requirement was communicated 124 days after submission and was withdrawn when challenged, because the owner's underlying information was wrong. An itemized description filed with the Commission would have exposed that error at the outset instead of leaving it to the applicant to discover. We recommend three additions to strengthen the wording. First, each item should state its cost amount and the basis of the estimate (vendor quote, internal standard cost, or class estimate). Second, each item should identify the specific system condition that makes it necessary and explain why the cost is incremental to serving the site's existing load, since costs of connecting a micro-generation unit are otherwise borne by the owner under Section 4(2). Third, the owner should state whether any item involves

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	explain. (iii) For any included cost that does not have a finalized cost estimate, please indicate when a finalized cost estimate is expected.	an asset that was already scheduled for, or due for, replacement or upgrade; only the incremental portion attributable to the micro-generation unit should be eligible as extraordinary.
Comparative analysis	d) For each of the costs provided in (c), please provide a comparative analysis that explains why the owner considers these costs to be extraordinary, for example, due to safety considerations, technological complexity or any other reason. This analysis must include any supporting evidence that the owner considers relevant and may address the following: (i) The costs and types of costs to connect the average micro-generation generating unit; (ii) The costs and types of costs to connect the average micro-generation generating unit of the same size category (small <150 kW or large >150 kW); (iii) The costs and types of costs to connect comparable micro-generation generating units (i.e., similar nameplate capability, geographic area, safety, technical, or other reasons); (iv) Any specific characteristics of the micro-generation generating unit that contribute to the technological complexity of connecting the micro-generation generating unit to the interconnected electric system; (v) Any factors related to the connection of the micro-generation generating unit that may impact the safety and/or reliability of the interconnected electric system, along with any implemented or planned mitigation strategies; and (vi) Any other information the owner considers relevant to the Commission’s consideration.	Supported, with one significant change: the comparative elements listed should be mandatory, not matters the analysis 'may address'. As drafted, an owner could satisfy the requirement with a conclusory statement that costs are extraordinary without comparing them to anything. The comparison to the average connection cost, and to comparable units by size and geography, is precisely what allows the Commission to test whether a cost is actually out of the ordinary. Two additions. First, the owner should be required to disclose the technical data underlying the analysis: conductor values, transformer loading, voltage assessment assumptions and the load data used. In our documented experience, an upgrade determination was made and later withdrawn on a transformer where a comparable system had previously been approved; a required comparison to comparable connections, supported by data, would have surfaced that inconsistency immediately. Second, where the owner relies on 'average' costs, it should state the data source, the sample size and the time period, so the average is verifiable rather than asserted.

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General	
Section 6(1) of Rule 024 states that “the owner shall file a completed notice of dispute…within 14 days from the date in which the owner finalizes its cost estimate”. The Commission is aware that the cost estimates for each item or category of items associated with the connection of a micro-generation generating unit may be finalized at different times in the connection process. Please comment on the optimal timing for an owner to submit an application under Section 4(3) or 4(3.1) of the *Micro-generation Regulation*.	**Stakeholder comments:** The optimal timing is early and bounded, and the trigger must be visible to the applicant. We recommend three elements. First, a preliminary flag within the initial 14 day completeness window under Section 3(3) of Rule 024 whenever the owner's screening indicates potential extraordinary costs, so the customer learns of the exposure before making commitments. Second, a defined filing deadline: the application under Section 4(3) or 4(3.1) should be filed within a fixed period of the owner completing its detailed assessment, and in any event before any cost responsibility is stated or implied to the customer. Third, the phrase 'finalizes its cost estimate' in Section 6(1) should be tied to a defined, observable milestone. As currently drafted, the owner alone decides when an estimate is final, which means the 14 day clock can float indefinitely and the customer cannot tell whether the owner is in or out of compliance. If cost estimates for different items are finalized at different times, each finalization should trigger its own filing and customer notice obligation. Staged estimates should not become staged surprises. Our experience illustrates the cost of leaving this open. On SMG-06661, an upgrade requirement was communicated 124 days after submission, after four months of correction cycles, with customer cost responsibility implied before any application to the Commission had been made. The customer was asked to choose between withdrawing the application and paying for the upgrade. When the determination was challenged, the owner withdrew it because its underlying information was wrong. Early, bounded and Commission supervised timing exists precisely to prevent that sequence.
Please provide any additional information requirements that should be included in an application under Section 4(3) or 4(3.1) of the *Micro-generation Regulation*. Please explain your position.	**Stakeholder comments:** We recommend four additional information requirements. 1. A process chronology for the application: the submission date, the dates of each correction round, and the date the owner first identified the potential extraordinary cost. This lets the Commission assess whether the determination arose from a complete initial review or emerged late in an extended process, and whether the timing requirements of Section 6 were met. 2. Confirmation of customer communications: what the owner has told the customer about potential cost responsibility and when, with copies. The application should

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	include an express confirmation that no cost liability was stated or implied to the customer before Commission concurrence, since implying liability first reverses the sequence the regulation requires. 3. An alternatives analysis: the options considered to avoid or reduce the claimed costs, such as export limiting or zero export inverter configurations, smart inverter settings, or energy storage control, with the estimated cost of each and the reasons for rejecting them. A cost is not extraordinary if a standard, lower cost alternative would resolve the constraint. 4. The full technical assessment behind the determination, including methodology and assumptions, provided both to the Commission and to the applicant. The applicant cannot meaningfully respond to a claim it cannot verify, and Commission review is faster when the evidentiary record is complete at filing. Finally, we note that our responses to the Rule 024 questionnaire, filed in this same engagement, address related process issues including review timelines, the measurement date for system sizing, and metering, and we ask that the two documents be read together.