# Rule 024 engagement questionnaire

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| **Comments from (*company/stakeholder name*):** | Boreal Energy Solutions Edmonton |
| **Date [yyyy/mm/dd]:** | 2026/07/30 |
| **Role:** | Microgeneration proponent; licensed so and battery storage installer (residential small commercial, small microgeneratio 150 kW) |

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| **Contact name (*for companies*):** | Jordan Forsythe, President |
| **Phone:** | [redacted] |
| **Email:** | [redacted] |

[redacted]

[redacted] 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.

> Boreal Energy Solutions is a licensed solar PV and battery storage installer operating in Alberta since 2018, in both the FortisAlberta and EPCOR (City of Edmonton) service territories. Our work is almost entirely small microgeneration (under 150 kW), so we cannot comment on large microgeneration timelines.
>
> Our experience differs sharply by distribution facility owner. Across 55 completed applications in FortisAlberta territory from mid 2024 to March 2026, the average time from submission to commissioning approval was 102.3 days, the median was 86 days, the fastest was 17 days and the slowest was 418 days. None of the 55 received a disposition (acceptance or a notice of dispute) within the 14 day window contemplated by the Micro-generation Regulation, AR 27/2008 s.2(2). Over the same period, identical submissions from the same company, prepared to the same documentation standards, were processed by EPCOR without comparable delay and without a single compliance issue or unexplained hold.

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

> Yes, consistently. The main contributing factors in our experience are: (1) an open ended corrections cycle used in place of the accept or dispute framework in AR 27/2008 s.2(2), with no defined timeline for the owner's review at each round and no obligation to issue a disposition at the end; (2) correction items raised for the first time in later rounds that were not identified in the initial review; (3) internal review deadlines left unpopulated in the owner's project management system, so no stage of the review carries a due date; and (4) reassessment of system sizing and voltage requirements partway through the process.
>
> Applicant response time is not a material factor in our portfolio. Our standard practice is to respond to owner questions or correction notices within one business day, and our correspondence records support this.

   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, with the caveat that information alone will not shorten a review that has no deadline. Comments on each suggestion are provided below.

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

> Helpful, but only if the minimum timelines are binding or are at least published together with the owner's actual performance against them. We would go further: Rule 024 should set maximum cumulative review

timelines for small microgeneration and require a disposition (acceptance or a notice of dispute) within them, consistent with the structure already in AR 27/2008 s.2(2).

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

Useful for proponents considering projects near the 150 kW threshold. A lower priority than enforceable timelines.

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).

Useful transparency, with one caution: a published list of common delay circumstances must not become a standing justification for delay. Where delay is attributed to customer or proponent response times, that attribution should be supported by dates, information requested, date of request and date of response. In our records, our responses are typically provided within one business day, so a generic explanation citing applicant responsiveness would not match the correspondence record.

iv. Other (please explain).

Yes. Owners should disclose the technical review methodology used in their assessments: voltage rise assumptions, starting voltage, load assumptions and conductor values, and hosting capacity information where available. We have had voltage concerns cited on applications while the assumptions behind the owner's determination were not disclosed, which makes it impossible to verify or efficiently correct a design. Owners should also confirm which revision of their interconnection standard governs an application as of its submission date.

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:

In our experience the constraint is not missing applicant information. Comments on each suggestion are below.

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

Boreal submits complete technical specifications with every application: module, inverter and storage equipment details, single line diagrams, and voltage rise calculations prepared to the owner's own published standard. Additional detail only reduces delay if it is reviewed promptly, in a single complete initial review, against a stable standard. A standardized provincial completeness checklist would make completeness objective and would prevent new correction items surfacing in later review rounds.

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.

Our applications already document sizing justification: each system is sized to a maximum of 105 per cent of the customer's trailing 12 month consumption as recorded in the owner's own data at the date of submission. The difficulty we have experienced is not absent justification but the measurement date. Systems that were compliant at submission have been reassessed months later against a 12 month window that had shifted forward during the owner's own review delay. Requiring more justification from applicants does not fix that; fixing the measurement date does. Please see our response to question 5.

iii. Other (please explain).

No other suggestions.

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.

Materially, and in a specific way. In four of our 55 completed FortisAlberta applications (SMG-05151, SMG-05209, SMG-05792 and SMG-06668), a System Oversized notice was issued 96 to 114 days after submission. Each of those systems was sized to the consumption data available in the owner's system at submission. Because the review took three or more billing cycles, the trailing 12 month consumption window shifted forward before the review occurred, and the owner assessed compliance against the shifted window, using the phrase 'the annual combined consumption (based on the last 12 months)' as at the review date. The effect is that the owner's own delay converted compliant applications into non-compliant ones. In three of the four cases the customer was required to reduce the system and lost capacity. One case was compounded by a site being treated as part of an aggregation after it had been removed from it, which the owner later acknowledged as confusion on its end.

AR 27/2008 s.1(1)(h)(ii) does not specify a measurement date. We ask the Commission to confirm that sizing compliance is assessed as of the date the application is submitted. That is the only interpretation under which an owner's review delay cannot change the compliance status of an unchanged application.

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.

As a professional installer we are generally aware of all three. Our comments below focus on how this information could be made more accessible for customers, who in our experience mostly are not.

a. Legislative requirements applying to microgeneration in Alberta.

Yes, as an installer. Most homeowner customers are not. A plain language AUC guide to microgeneration rights and obligations, including the 14 day framework and the cost allocation rules, would help customers understand what to expect.

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

Yes, as an installer. For customers, a single AUC comparison page covering eligibility, metering, compensation and process differences between microgeneration, small scale generation and distribution connected generation would be valuable.

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

Yes, although revisions to owner technical standards are not always communicated when they take effect. Owners should publish each revision with its effective date, and applications should be governed by the version in force at their submission date.

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.)?

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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.

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?*

Boreal is aware of it. In our experience most residential and small commercial customers are not.

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

Only marginally. The Small Scale Generation Regulation pathway can suit some community scale projects, but the issues raised in this engagement, review timelines, mid process reassessment of sizing and standards, and cost transparency, are process issues. Awareness of an alternative regulation does not resolve them.

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.

For small microgeneration the larger issue in our experience is late arriving cost exposure rather than drifting estimates. On one application (SMG-06661), an infrastructure upgrade notice was issued 124 days after submission, after four months of correction cycles, on a transformer where a comparable system had previously been approved. The customer was presented with a choice between withdrawing the application and paying for the

upgrade. No application for Commission concurrence under AR 27/2008 s.4(3) had been made before that cost responsibility was implied.

When the determination was challenged, the owner acknowledged its information was wrong and withdrew the upgrade requirement. The owner had the conductor data, the system specifications and the neighbouring system's details throughout the review period, so the original determination reflected inadequate due diligence rather than missing information. The outcome was corrected only because the applicant had the technical capacity to challenge it. A homeowner dealing with the owner directly would likely have withdrawn the application or paid for an upgrade that was not required.

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?

Disclosure from owners at the front of the process: hosting capacity or transformer loading screens at application, conductor data, the voltage assessment methodology and assumptions, and the criteria the owner uses to decide when an upgrade is required. If the initial review is complete and performed with full information in the first cycle, late upgrade determinations should be rare.

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 the initial 14 day completeness and acceptance window, as a preliminary screen based on the owner's system data, and in any event before the customer makes irreversible commitments. Separately, no customer cost liability should be stated or implied before the Commission has concurred that the costs are extraordinary under AR 27/2008 s.4(3). Rule 024 should set minimum information requirements for an extraordinary cost claim: itemized scope and cost basis, the specific system condition that necessitates the work, the relationship of the claimed costs to the microgeneration unit, and the alternatives considered.

## Technical standards

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

Yes. We have had voltage related requirements applied partway through reviews that were not raised in the initial review, and correction items appearing for the first time after resubmission. For battery storage systems, the owner acknowledged to us in writing in February 2026 that its review process for storage systems was 'relatively novel' and that new internal processes were being developed while our applications were already under review. Applications should not absorb the schedule cost of an owner developing its internal processes.

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?

Owners should publish their interconnection standard and every revision with effective dates, disclose the assessment methodology and assumptions used on a specific application on request, and commit that an

application is governed by the standard in force at its submission date, with in flight applications grandfathered.

## Communication

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

   Individual field and administrative staff are generally professional. The process communication, however, is one directional: correction notices arrive without any timeline for the owner's next review, no disposition is issued at the end of a review round, and there is no visibility into status between rounds. In the owner's own project management system, the deadlines field is unpopulated on every one of our applications, so no stage of the review carries a due date that could be communicated.

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, effectively never on the owner's initiative. Updates occur when a correction notice is issued or when we proactively inquire. We cannot comment on large microgeneration.

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.

   A combination: a status update at least every 14 days while an application is open, plus an update at each phase change. Comments on each option are below.

   a. Every 14 days

      Supported as the maximum interval while an application is pending. It aligns with the 14 day cadence already embedded in AR 27/2008 s.2(2) and Rule 024 s.3(3), and the burden is low because owner project systems already record stage timestamps; the update can be generated from data the owner already has.

   b. When the project enters a new phase

      Supported, in addition to the 14 day interval, and the update should state the date the new phase began and its expected duration.

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

Supported, and it should be immediate, with the underlying data or assumptions disclosed so the applicant can verify the determination rather than simply being informed of it.

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

Supported, with a corollary. If information such as consumption data can become outdated during the owner's own review delay, the owner should say so at acceptance, and the application should be assessed against the data as at submission. An applicant should not lose compliance because review time passed. Please see our response to question 5.

e. Other

The most valuable communication is a disposition: accept the application or file a notice of dispute within a defined time. Status updates matter, but they are a substitute for a decision only when decisions are not being made on schedule.

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).

Comments on each option are below. In general, the methods that work are those that leave a record and are backed by data the owner already tracks.

a. Direct emails/phone calls

Effective for project specific matters and our default channel. Our standard practice is to respond within one business day. Direct communication should be mirrored in a portal record so both parties see the same status and history.

b. In-person or virtual meetings

Useful for novel configurations such as battery storage and zero export systems, where a short technical meeting can resolve in one hour what a corrections cycle takes months to resolve. Not needed routinely.

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

Supported for general and system wide information: interconnection standard revisions with effective dates, assessment methodologies, hosting capacity information and known constraint areas.

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

Supported for cross owner material: the applicable regulations, a comparison of each owner's requirements, and connection timeline statistics by owner. Publishing each owner's median and average connection times for small microgeneration would create a meaningful performance incentive at very low cost.

e. Other

Automated status notifications generated from the owner's existing project management system. The stage data already exists; communicating it is a reporting function, not a new workload.

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?

Four changes: (1) enforceable review timelines ending in a required disposition, consistent with AR 27/2008 s.2(2); (2) disclosure of assessment methodologies and the data behind adverse determinations; (3) routine status visibility generated from owner project systems; and (4) AUC publication of per owner connection timeline statistics. Our basis for confidence is direct: with identical submissions, documentation and processes, our experience in EPCOR territory includes none of the delays documented above, while in FortisAlberta territory the average completed application took 102.3 days. The difference is the process, not the applications.

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?

Our documented experience is the four System Oversized cases described in our response to question 5. The reductions were communicated as notices stating that the system exceeded 'the annual combined consumption (based on the last 12 months)', with the 12 month window measured at the review date rather than the submission date. The notices did not acknowledge that the owner's own review delay had shifted the window, and the methodology behind the recalculation was not provided with the notice.

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

Two options in practice: reduce the system to the recalculated limit, or not proceed. No option was offered to be assessed against the consumption window as at submission, and no option to preserve sizing that was compliant when the application was filed. In three cases customers lost capacity they had contracted for, and in one case installed panels were removed.

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.

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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.

Yes, feasible and helpful. Owner project management systems already timestamp every stage of the review; producing a status message from that data is a reporting task rather than a staffing burden. For small microgeneration a simple notice of current stage, days in stage and next expected action would resolve most of the opacity we experience.

## 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.

Four items.

1. Sizing measurement date. AR 27/2008 s.1(1)(h)(ii) ties unit size to the customer's total annual energy consumption but specifies no measurement date. We ask the Commission to confirm that compliance is assessed as of the submission date, so that an owner's review delay cannot convert a compliant application into a non-compliant one. Our response to question 5 documents four cases where this occurred.

2. Extraordinary costs. Rule 024 should set minimum information requirements for extraordinary cost claims under AR 27/2008 s.4(3), and should state expressly that owners may not state or imply customer cost liability for system upgrades before Commission concurrence has been obtained.

3. Metering and the AMI transition. Owners are replacing existing meters with interval capable AMI meters across their territories; FortisAlberta's exchange program began in October 2025 with completion expected around 2029, and the new meters are bi-directional. Under s.3(3) to s.3(5) of the Micro-generation Regulation, small micro-generation is deemed to be large micro-generation when a customer requests an interval meter, and under s.7 that deeming changes the customer's compensation from the retail rate to the hourly pool price. The regulation is silent on owner initiated meter replacement. We ask the Commission to confirm in Rule 024 that installation of an interval capable meter at the owner's initiative, including under a fleet wide meter exchange program, does not trigger the deeming provision, does not convert small micro-generation to large, and does not change the customer's compensation method. Without that clarification, a routine meter exchange could be read to strip small micro-generators of retail rate crediting that the regulation intends them to have.

4. Cost recovery for hosting capacity investment. We understand distribution facility owners take the position that they lack a funded pathway to invest in distribution capacity that accommodates exports from distributed generation, because capital funding categories under performance based regulation are framed around load growth, safety and reliability. To the extent that is the case, we support correcting it. The Commission should establish explicit cost recovery for DER accommodation investment, including a DER driven capital category, distribution system planning that forecasts distributed generation growth, and published hosting capacity information at the feeder and transformer level. Connection costs for individual micro-generation units are already recoverable in rates under AR 27/2008 s.4(2); extending clear recovery to proactive hosting capacity investment would reduce extraordinary cost disputes at the source, because constraints would be addressed through planned, socialized investment rather than surfacing one application at a time as a charge to whichever customer applies first. We understand this aligns with positions distribution facility owners have themselves expressed, and we would support a proceeding to implement it. We note, however, that a funding gap for proactive investment does not explain or excuse untimely processing of individual applications under the existing framework, which requires no new investment authority.