Azgard Solar Inc
Unit #2, 34 Wrangler Place SE
Rockview County, AB, T1X 0L7
Info@azgard.com
(403) 236-5501

June 23, 2025

Alberta Utilities Commission
Calgary Head Office
1400, 600 Third Avenue SW
Calgary, Alberta T2P 0G5

Subject: Submission for AUC Written Consultation – Rule 024: Rules Respecting Micro-Generation

Dear Commissioners,

Thank you for the opportunity to participate in the AUC's written consultation regarding Rule 024: *Rules Respecting Micro-Generation*. I am a solar system owner and active participant in Alberta's micro-generation landscape, and I appreciate the Commission's commitment to ensuring this framework continues to serve Albertans efficiently, fairly, and transparently.

Please find my responses to the consultation questions below:

Question 1: Standardized Methodologies and Consumption Estimates

Yes, a standardized methodology should be established for estimating both a site's annual electricity consumption and the expected output of a Micro-Generation unit. This is especially important for properties such as farms, where energy usage can fluctuate widely due to weather or operational needs.

The current language referring to a system supplying "all or part of the customer's annual consumption" is vague. Clarifying what constitutes "total annual energy use" would help both applicants and utilities.

That said, if customers were allowed to produce and export as much solar energy as they choose, these estimates would be less critical. Most people naturally aim to offset their bills and install the largest system they can afford or physically accommodate. Retroactive expansion is often impractical and costly.

If export limits remain in place, then the estimate should be based on the greater of either the average annual usage over the past five years or the most recent 12 months.

Q1(a) Best Historical Timespan

Use the higher of either the past five-year average or the most recent 12-month consumption. This gives a fair estimate while accounting for unusual years or recent growth. Especially when dealing with many of our irrigation clients, where usage fluctuates annually.

Q1(b): Future Usage at New Sites

For new homes or sites, utilities should rely on basic, consistent data: square footage, number of occupants, major appliances, and anticipated EVs or heat pumps. EnerGuide labels and energy audits can help make these projections more accurate.

Q1(c): Proof of Increased Future Usage

If a customer intends to increase usage shortly after installing solar, a receipt or signed agreement for energy-intensive equipment (e.g., EVs, chargers, or heat pumps) should be accepted.

As noted by Solar Alberta, the current rule doesn't properly accommodate heat pump installations that are paired with gas furnaces, which poses a barrier to transitioning to cleaner energy systems.

Q1(d): Estimating Yearly Energy Output

Installers already calculate annual output based on panel orientation, tilt, shading, and geographic data. These estimates are part of the standard documentation and should suffice for the AUC's requirements.

Question 2: Post-Approval Compliance Monitoring
Response 2:
Ongoing compliance monitoring after system approval is unnecessary and would create additional costs and administrative burdens. Customers would risk being penalized or forced to reduce their system's capacity, which could negatively affect Solar Club participants and other flexible rate users.

The regulation states systems should be "intended" to meet usage — emphasizing intent rather than hard limits.

Q2(a): Post-Approval Compliance Responsibility

No post-approval monitoring should be implemented. The permitting, design, and installation process already involves oversight. Adding more after-the-fact controls discourages adoption and creates unnecessary complexity.

Question 3: Inverter De-Rating and Capacity Controls

Current practices already prevent unauthorized system size increases. Expansions must go through a new application process. Also, inverter settings cannot be changed by the customer — only by certified installers or manufacturers — which adds another layer of protection.

Q3(a): Permission for De-Rating Inverters

Yes, de-rating should be permitted. Given the existing regulatory structure, there is no added benefit to restricting inverter capabilities further.

Question 4: Pre-Application Sizing Determination

Yes, if the purpose of the Pre-Application Sizing Determination is to expedite the application process by allowing applicants to submit their estimated annual usage for initial approval, then this would be beneficial. It would streamline the process, reduce wait times, and help avoid the need for multiple applications to the wire services, ultimately improving efficiency for both applicants and the utility.

Question 5: AUC-Facilitated Working Group on Technical Standards

Yes, creating a working group would be highly beneficial. As technical standards (especially for inverters) evolve rapidly, having a collaborative space for utilities, installers, and regulators would help maintain alignment and clarity in the application process.

Q5(a): Meeting Frequency and Topics

Quarterly meetings would be sufficient. In addition to inverters, the group should discuss wiring standards, metering technology, safety codes, and grid interconnection protocols.

Q5(b): Alternate Approaches (if no working group)

If a working group isn't feasible, the AUC could still stay current through solar industry newsletters, participation in professional associations, and monitoring of standards updates from organizations such as CSA or IEEE.

Question 6: Other High-Priority Micro-Generation Issues

Alberta's current rules have made our province a leader in solar adoption. The system works well because:

1. Exported energy is credited at the same rate as consumed energy — which is fair and simple.
2. Customers can switch rate plans to maximize their solar value — especially important for rural and seasonal users.

Adding more red tape or complexity would slow down adoption, discourage investment, and hurt rural solar growth. Instead, efforts should focus on:

- Preserving flexible net billing policies.

- Avoiding post-installation restrictions or inspections.
- Ensuring fair access and approvals across urban and rural areas.
- Holding installers to consistent sizing and design standards.

Thanks to Alberta's flexible and fair solar framework, thousands of us have invested our own time and money into creating cleaner communities and stronger grids.

To maintain that momentum, I urge the AUC to prioritize:

1. Allowing Albertans to generate and export solar energy freely, without rigid sizing limits.
2. Supporting flexible billing options that make solar financially viable.

More rules, restrictions, or monitoring could set us back. Instead, let's make it easier — not harder — for everyday people to be part of Alberta's clean energy future.

Thank you for taking the time to hear from Albertans like me.

Sincerely,

Tammy Noriega (on behalf of Azgard Solar Inc.)