Rule 024 and micro-generation application processes questionnaire

Questions:

1. Should there be a standardized methodology or minimum information requirements for utilities' calculation of the estimated annual consumption at a customer's existing or new site and the calculation of the micro-generation unit's output? Please provide an explanation.

    a. Please identify and justify the best historical timespan for accurately assessing a customer's historical energy usage (for existing sites). 12 months, per Rule 010, as this best represents the latest usage window. Customer has the option to include additional details on large load additions that may impact future loading which has the potential to increase the expected future energy usage.

    b. Please identify and justify the best way for accurately projecting a customer's future energy usage (for new sites). n/a. Not utilities' responsibility to calculate future energy usage. This is the customer's responsibility which they can reference the Canadian Electrical Code for assistance.

    c. Please specify and justify the minimum level of proof that utilities should accept if a customer explains that they intend to increase their electricity consumption shortly after installing a micro-generation system (such as electric vehicle proof of purchase, etc.). Datasheet or calculation outlining the anticipated energy usage including timing for load to be added.

    d. Please explain how a new micro-generation unit's yearly energy output should be calculated, including accommodation for any partial shading or coverage of a rooftop solar photovoltaic system. n/a. Not the utilities equipment, this is the responsibility of the solar equipment supplier or contractor.

2. There are currently no specified mechanisms for monitoring the compliance of micro-generation systems with the Micro-Generation Regulation (i.e., the micro-generation system generates all or a part of, but not more than, the customer6s yearly electricity consumption) after the system is approved. How important is post-approval compliance monitoring to ensure micro-generators are remaining aligned with the Micro-Generation Regulation? Please provide an explanation.

    a. Please identify and justify the best way to structure mechanisms for post-approval compliance monitoring, particularly regarding which party (or parties) should assume primary responsibility (such as the AUC, the AESO, utilities, etc.). Energy provider to provide the utility with a 12 month summary, per Rule 010, report of each microgen site, with anniversary date provided by the utility which coincides with the initial bidirectional meter installation. BRPC's current concern is the MG guidelines indicate net zero production, however there is no authority or direction from the AUC regarding how to enforce (or consequences for the customer) situations of overgeneration which would be identified in this question.

3. What type of inverter de-rating, and associated evidence of this de-rating, would ensure that a micro-generation facility will not later increase its system capacity beyond the micro-generation system size approved by the utility? Please provide an explanation.

ae Should micro-generators be permitted to de-rate their inverters, subject to the previously described limitations? Please provide an explanation. BRPC does not allow inverter de-rating. This equipment is not owned by the utility and we have no ability to control the de-rating process, so it is simply not allowed.

4. The City of Medicine Hat s micro-generation application process includes an initial step to determine a potential micro-generation system s maximum permissible size, which has been found to reduce the number of full applications received Would it be useful for the micro-generation application process to include an initial sizing determination phase, where a utility first determines a customer s maximum permissible micro-generation system size before the customer makes a decision to proceed to a full application? Please provide an explanation. BRPC has not experienced this problem at this time.

5. The AUC has heard from stakeholders that inverter standards for micro-generation systems often change, creating temporary misalignment with some AUC guidance documents and contributing to some confusion among micro-generation applicants. Would it be helpful for the AUC to facilitate a working group of relevant parties that reviews technical standards (for inverters, etc.)? Please provide an explanation. No suggestions at this time.

    a If yes, how often should the working group meet? (e g monthly, quarterly, bi-annually) Please provide examples of technical requirements, other than inverters, that should be included in the discussions

    b If no, please suggest a different way that the AUC can keep abreast of changing technical standards.

6. Please identify, and provide justification and details for, any other high priority micro-generation issues that should be addressed to ensure the effective and efficient functioning of the micro-generation landscape. None at this time.