Dear AUC,

Thank you for the opportunity to provide feedback on Rule 024 and the future of micro-generation in Alberta. I write today out of concern that the direction of proposed regulatory changes risks undermining the very momentum that has made our province a national leader in distributed renewable energy.

Alberta has always been an energy province. From oil and gas to solar and wind, our strength lies in our capacity to adapt and lead. That adaptability is more important now than ever as global data center demand surges and Alberta becomes an increasingly attractive location for large-scale digital infrastructure. These facilities, many of which are being planned or built right now, require vast amounts of electricity. Rooftop solar, when paired with fair regulatory treatment and net billing, can help offset these growing loads and offer critical support to Alberta's energy resilience.

Instead of enabling this opportunity, the current direction of micro-generation policy risks adding delays, red tape, and uncertainty for homeowners, farmers, and small businesses who have invested their own capital into clean energy. Onerous sizing restrictions, post-installation compliance checks, and inverter de-rating requirements will not enhance grid reliability - they will erode public trust and slow adoption.

We should not be designing policies that lead to four-panel solar systems on roofs that can support forty. We should not be discouraging Albertans from planning for future EVs, heat pumps, or electrification. And we absolutely should not allow regulatory hesitation to drive away data center projects or cancel billions in potential renewable investment, some of which has already fled to neighboring provinces.

I urge the Commission to recognize this moment as one of opportunity. The smart path forward is one that embraces decentralized energy, values grid contributors of all sizes, and aligns with the direction that both consumers and the global economy are already moving.

Sincerely,

Coleman Rooksby

**Question 1: Standardized Methodology for Annual Consumption and Output Calculations**

**Response 1:**
Yes, establishing a standardized methodology for Wires Service Providers (WSPs) to calculate estimated annual consumption would be helpful. However, this need is rooted in a regulatory framework that unnecessarily constrains customer rights to generate clean energy. Rather than focusing on limiting generation to estimated consumption, we should allow for unrestricted self-generation and export. Doing so would simplify the process, reduce administrative overhead, and support Alberta's broader energy goals.

Furthermore, as Alberta sees increasing interest in building high-density, power-hungry facilities such as data centers, we must rethink our approach to distributed energy. Micro-generation, particularly solar, can play a meaningful role in supporting the energy demands of this emerging industry. Rather than stifling solar expansion, regulations should encourage flexible and scalable systems that align with dynamic load profiles.

**Response 1(a):**
In the absence of unlimited self-supply and export, applicants should be allowed to use the higher of a five-year average or the previous 12 months of consumption to determine system sizing. This approach reflects variability in usage and ensures customers aren't penalized for short-term consumption fluctuations.

**Response 1(b):**
For new sites, usage estimates should consider planned infrastructure and appliances. A standardized checklist of anticipated loads (e.g., EVs, heat pumps) alongside EnerGuide ratings or home energy assessments would provide a reliable basis. But again, this becomes less necessary if unlimited self-generation is permitted.

**Response 1(c):**
Proof of purchase or installation of high-load devices such as EV chargers, heat pumps, or electric ranges should be sufficient. More stringent proof is likely to deter consumers from electrifying their homes.

**Response 1(d):**
It is reasonable to require solar installers to provide detailed output calculations using geographic location, tilt, azimuth, panel specs, and shading analysis. These are standard in the industry and can be included in commissioning documentation. That said, such calculations should serve as guidance, not as regulatory constraints.

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**Question 2: Post-Approval Compliance Monitoring**

**Response 2:**
Post-approval monitoring would introduce unwarranted complexity and risk for customers who have already made significant financial investments. It would also signal regulatory uncertainty, undermining confidence in Alberta's micro-generation framework. Most importantly, it would threaten the economic viability of programs like solar-specific retail plans, which are essential to project ROI.

Unrestricted self-supply and export would render post-approval monitoring unnecessary and ensure flexibility for homeowners as their energy needs evolve—including support for growing electricity demand from the digital economy and AI-powered data centers.

**Response 2(a):**
Should monitoring be mandated, responsibility should not fall on the customer. If unavoidable, the wires owner or a centralized agency should perform audits sparingly and only in clear cases of misuse. However, a better approach is to avoid monitoring altogether by permitting unlimited export and self-use.

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**Question 3: Inverter De-Rating and System Expansion**

**Response 3:**
Current permitting processes already address system sizing and grid limitations. Any expansions or modifications trigger new approvals. Additional inverter restrictions are redundant and create technical hurdles for consumers. Inverter settings are typically inaccessible to the homeowner, and any tampering is traceable, making intentional misuse unlikely.

The focus should be on enabling scalable clean energy systems that can respond to growing demands, such as electrification and the exponential energy needs of data infrastructure.

**Response 3(a):**
Yes, de-rating should be permitted within the scope of existing interconnection agreements. Mandating against it restricts flexibility without yielding significant regulatory benefits.

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**Question 4: Initial Sizing Determination Phase**

**Response 4:**
Introducing a sizing pre-check stage may reduce application volumes but at the cost of

discouraging adoption. Alberta should be removing friction from the process, not adding to it. The most effective way to ensure responsible installations is through clear guidelines and accountability among certified installers—not another layer of approval.

This is especially critical as Alberta positions itself to become a hub for data centers. Micro-generation offers a decentralized way to offset load and reduce grid strain.

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**Question 5: Technical Standards Working Group**

**Response 5:**
Yes, a working group of utilities, solar professionals, and regulators would help maintain alignment with evolving inverter and system standards. This proactive approach would reduce confusion and improve regulatory clarity.

**Response 5(a):**
Quarterly meetings are a good starting point, with flexibility to adjust based on industry needs. Discussions should include not only inverters but also battery systems, EV chargers, and software platforms for system monitoring.

**Response 5(b):**
If a formal working group is not feasible, participation in national standards bodies and industry newsletters should be prioritized.

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**Question 6: Additional Priorities**

**Response 6:**
Alberta's success with micro-generation stems from clear incentives, minimal red tape, and innovative retail structures like the Solar Club. We must retain the:

1. **One-to-One Net Billing**: This is the economic foundation for most installations.
2. **Solar-Specific Retail Options**: These plans help align generation with market realities.

Additionally, Alberta has a unique opportunity to marry its leadership in solar adoption with the increasing demand for data center infrastructure. Micro-generation can serve as a buffer for peak demand, offer resilience during load surges, and ensure that the province's digital economy is powered sustainably.

Imposing restrictions on system sizing, export capacity, or post-installation monitoring will stifle this potential. Instead, let’s double down on simplifying the process, enforcing

industry standards through installer accountability, and supporting decentralized power generation as a core part of Alberta’s energy mix.

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**Closing Remarks:**
As a solar customer and a believer in Alberta's energy leadership, I urge the AUC to protect the regulatory features that have driven adoption. Let’s align our policies with the emerging realities of electrification, digital infrastructure, and sustainability by prioritizing flexibility, clarity, and growth.