Rule 024 and Micro-Generation Application Process Questionnaire

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I am a member of the Solar Club™, and as someone who uses solar energy at home, I wish to share my input on the AUC's review of Rule 024 and the microgeneration rules.

The Solar Club allows members like myself to switch between a high rate in the summer (when we're typically producing more energy than we consume) and a low rate in the winter (when we tend to use more than we generate). This rate setup makes investing in solar panels worthwhile.

Some of the changes the AUC is exploring could make it more difficult for people to go solar. New rules could slow down the return on investment in solar panels and could add a number of unnecessary steps. People should be allowed to produce and use as much of their own power as they want — and send extra back to the grid if they have it.

In closing, to keep a system of flexibility and fairness going, we need to make sure two key elements stay in place:

1. Let people generate and share as much solar power as they can without limits
2. Keep solar-friendly electricity plans that make it worthwhile to go solar

Some of the ideas in this review, like more checks, restrictions, or size limits, could scare people off or make it harder to join the solar movement. Instead, let's focus on making the process smoother, keeping installers accountable, and supporting more people to make the switch.

Please find my responses to the questionnaire below. Thank you for your time.

Regards,

Alex Potvin

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?*** Yes, there should be a clear and consistent way to figure out how much electricity a site normally uses, especially where usage can depend a lot on the weather. Right now, the rules say solar systems should be designed to supply all or part of what a household uses in a year, but what counts as "total annual energy use"? If consumers were allowed to produce as much solar power as they want and send any extra to the grid, we wouldn't need to worry about estimates such as these.

   (a): Please identify and justify the best historical timespan for accurately assessing a customer's historical energy usage (for existing sites). I think looking at the past five years or the last 12 months, and going with the higher number, is a good approach.

   (b): Please identify and justify the best way for accurately projecting a customer's future energy usage (for new sites). For homes that don't have history to go on, the utilities should use some basic info to estimate — for example: the size of the home, appliances in it, EV chargers, etc. Government-issued EnerGuide labels could also help.

   (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.). If people were allowed to send all their extra solar power to the grid, this wouldn't even be needed. But if they're not, then showing proof for a big new appliance (especially energy-hungry ones like electric vehicles or heat pumps) should be enough.

   (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. Installers already figure out things like the angle and direction of the panels, shading, location, and equipment specs when planning a system. All of that should be part of the paperwork customers get when their system is installed. This calculation isn't really necessary if we're allowed to freely produce and share power, but customers should still be given the numbers so they understand what their system is expected to do.

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 customer's 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 example.*** There's no need for extra inspections or monitoring to check up on solar users after their system is approved and installed. It could mean that people like me would have to downgrade our systems or remove panels, which would be expensive and frustrating. The rule actually says systems should be "intended" to meet part or all of our usage - it shouldn't be about strict limits.

   (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.). Post-approval checks would just make things harder, especially for consumers who are already investing a lot of time and money to go solar. The whole process already includes permits, inspections, and financing - adding more steps would likely turn people away.

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.*** There is already a system in place where you need approval before installing your solar setup, and that includes checking the size of the system. If someone wants to make their system bigger later, they'd have to go through that same process again. That seems like enough. Also, only the installer or manufacturer can change the power output of my inverter, so there is already a control in place for this. Adding more restrictions or checks after the fact just wastes time and money.

   (a): Should micro-generators be permitted to de-rate their inverters, subject to the previously described limitation? Please provide an explanation. Since we already have rules and approval steps that manage system sizing, there's no need to limit or restrict inverter settings. The setup we have now makes more sense and works fine.

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.*** We should be trying to make it easier, not harder, for people to go solar. Adding an extra sizing step at the beginning might sound helpful, but in practice, it just makes people give up before they even apply. Instead of putting the pressure on homeowners, I think installers should be held to a consistent standard for calculating system size. If they follow a shared code of conduct, that would go a long way in keeping things fair and accurate.

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.*** Yes, a working group would be helpful. It would make sure the rules keep up as equipment standards change. This would also cut down on confusion and make it less likely for people to mess up applications or have them rejected. Having utilities, installers, regulators, and others in the same room helps solve problems faster and more practically.

   (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. Since changes to technical standards don't happen all the time, I think meeting every few months would be enough. That way the group can focus on the issues that matter without meeting too often.

   (b): If no, please suggest a different way that the AUC can keep abreast of changing technical standards. If it's not possible to set up a working group, there are other ways to stay up to date — like subscribing to technical updates, joining professional groups, or following newsletters and alerts from the solar industry.

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.*** Alberta's solar rules have helped thousands of people switch to solar. It works because we get paid the same rate for energy we send to the grid as we pay for using energy and we can switch between different rates to make the most of our solar energy. If the AUC adds more steps or red tape, it will just slow things down more and discourage people from investing in cleaner energy.