Rule 024 and Micro-Generation Application Process Questionnaire

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Submission by: Jessica & Michael Norman (jnplacke@gmail.com)

Preamble:

I'm a member of the Solar Club which is run by UTILITYnet. As someone who uses solar power at home, I want to share my thoughts on the Alberta Utilities Commission's (AUC) review of Rule 024 and the micro-generation rules.

The Solar Club lets members like me switch between a high rate in the summer (when we're usually producing more energy than we use) and a lower rate in the winter (when we tend to use more than we produce). This seasonal rate setup helps make installing solar panels worthwhile. Most of us install the biggest system we're allowed to, based on current rules and the Solar Club's support.

Some of the changes the AUC is exploring could make it harder for people to keep going solar. New rules could slow down how quickly people can pay back their investment and could add a lot of unnecessary steps. **A major point I want to make is that we should continue to allow people to produce and use as much of their own power as they want — and send extra back to the grid if they have it. This idea is key to making solar power worthwhile for regular homeowners like me.**

Questions:

Question.7¿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?.

Response 1:

Yes, I think there should be a clear and consistent way to figure out how much electricity a household or site normally uses, especially for farm properties where usage can swing a lot depending 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 that's vague. What counts as "*total annual energy use*"? That needs to be clearer.

That said, if we were simply allowed to produce as much solar power as we want and send any extra to the grid, we wouldn't need to worry about these estimates as much. People like me naturally want to save money, and most of us have already installed the biggest system we can afford or fit. Expanding later is more complicated and costly.

Q7(a)¿Please.identify.and.justify.the.best.historical.timespan.for.accurately.assessing.a. customer"s.historical.energy.usage.(for.existing.sites)¡.

R1(a):

Again, if we're allowed to make and share as much solar power as we want, this question wouldn't really matter. But if not, then I think looking at the past five years or the last 12 months, and going with the higher number, is a good approach.

Q7(b)¿Please.identify.and.justify.the.best.way.for.accurately.projecting.a.customer"s.future.energy.usage.(for.new.sites)¡.

R1(b):

For homes that don't have history to go on, I think the utilities should use some basic info to estimate — like the size of the home, what kinds of appliances are in it, and whether things like electric vehicles, EV chargers, or heat pumps are expected. Government-issued EnerGuide labels could also help.

Home energy assessments could be useful too, especially for people planning to make their homes more energy-efficient.

Q7(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¡)¡.

R1(c):

Showing proof like a receipt or agreement for a big new appliance (especially energy-hungry ones like electric vehicles or heat pumps) should be enough. That's fair.

Solar Alberta has pointed out that heat pumps can't currently be included in initial sizing if they're paired with a gas furnace, which adds another barrier for people trying to upgrade to cleaner systems.

Q7(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¡.

R1(d):

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.

Question.8¿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¡.

Response 2:

Adding more rules to check up on solar users after their system is approved feels like overkill. It could mean people like me would have to downgrade our systems or remove panels, which would

be expensive and frustrating. It might also mess with the Solar Club's seasonal rate system, which depends on flexibility.

The rule actually says systems should be "intended" to meet part or all of our usage. That word matters; it's about intention, not strict limits.

If people can produce and send as much energy as they want, there's no need for extra inspections or monitoring after installation.

Q8(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¡)¡.

R2(a):

I don't think we need post-approval checks at all. It just makes things harder — especially for customers who are already investing a lot of time and money to go solar. The whole process already includes permits, inspections, and financing — it's not simple. Adding more steps would turn people away.

Question.9¿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¡.

Response 3:

We already have 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, I can't even change the power output of my inverter on my own. Only the installer or manufacturer can do that. So there's already a control in place.

Trying to add more restrictions or checks after the fact just wastes time and money. It targets a very small number of people and doesn't help the majority who follow the rules.

Q9(a)¿Should.micro_generators.be.permitted.to.de_rate.their.inverters?.subject.to.the.previously.described.limitation?.Please.provide.an.explanation¡.

R3(a):

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.

Question.0¿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¡.

Response 4:

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.

Question.❶¿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¡.

Response 5:

Yes, a working group would be helpful. It would make sure that as equipment standards change — and they do, regularly — the rules keep up.

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.

Q❶(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¡.

R5(a):

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.

Q❶(b)¿If.no?.please.suggest.a.different.way.that.the.AUC.can.keep.abreast.of.changing.technical.standards¡.

R5(b):

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.

Question.❷¿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¡.

It works because:

1. We get paid the same rate for energy we send to the grid as we pay for using energy — that's fair.

2. We can switch between different rates to make the most of our solar energy — that helps the math work out.

Keep this going by maintaining the flexibility and fairness of the current system.