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Alberta Utilities Commission

Regarding: Rule 024 and Micro-Generation Application
Process Questionnaire

Thanks for the opportunity to respond to your questionnaire and help with the decisions you are concerned about.

In October 2023 we bought a home that came already equipped with an array of solar panels on the roof, an inverter, and a connection to the Alberta electrical energy grid through Fortis. The solar power system had been installed after an assessment of the previous owners' annual electrical consumption, and sized to provide them with most of their power needs on an annual basis.

In order to get the best value from this system, we signed up with the Solar Club, operated by Utility Network & Partners Inc. through our chosen energy marketer, the Foothills Power Cooperative.

The Solar Club lets members like us switch between a high rate in the summer (when we produce more energy than we use) and a lower rate in the winter (when we use more than we produce). It's a pretty remarkable, and user-friendly, approach.

We have chosen to put up with a fair amount of inconvenience in order to keep our energy consumption low, for both idealistic and practical reasons. I have the bruises on my shin (from bumping into furniture in the dark) to prove it. Unlike the previous owners who had televisions, gaming boxes, and kids who were all in different parts of the house at the same time running lights etc., we have few electronic gizmos and as much as possible we leave lights off, heat turned down, etc.

As a result, in our first year we generated more electric power than we used. We applied the extra against our natural gas bills, which also come from the Foothills Power Cooperative. It saved us money, and we need every penny we can save. It felt good, and things should feel good. And it was simple; it just required a bit of sacrifice on our part.

In our opinion, some of the changes the AUC is exploring seem punitive to people like us who try to be responsible energy consumers. If we left all the lights on all the time and bought a big television and so on, we wouldn't be producing more electric power

than we use. But that's kind of a perverse incentive against conservation. We aren't profiting; we're conserving.

It makes more sense to us that the system be managed such that the initial installation of a solar grid-tie power system be subject to a proper energy audit for the proponent, as was done in our case, and that subsequent use not be subject to additional red tape. If we can reduce our energy consumption below what it was when the system was installed, good for us. If we can't, or choose not to, well the system will cover a portion of our energy use and we can pay the electrical company for the extra that we need to take off the grid. Our choice. Our freedom.

In short: don't micromanage, and don't add more red tape. Apply the rules at startup, and then let people make their own choices after that. Don't disincentivize people choosing solar grid-tie systems, and don't disincentivize energy conservation once people have those systems.

It's in that context that we offer the following responses to your questionnaire.

Question 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?

Response: Yes, of course there needs to be a clear and consistent way to figure out how much electricity a household or site normally uses, bearing in mind that rural users can vary a fair bit from year to year depending on things like bad winters or wet summers. As we understand it, the rules currently say solar systems should be designed to supply all or part of what a household uses in a year. That should be easy to determine based on previous years' billings. A reasonable way to determine the size of array allowed for initial installation would be to average the previous five years' consumption at that address.

1a): Please identify and justify the best historical timespan for accurately assessing a customer s historical energy usage (for existing sites).

Response:

Five years, or less if the residence or farm hasn't been on the grid for five years.

1b): Please identify and justify the best way for accurately projecting a customer s future energy usage (for new sites).

Response:

A similar approach to what municipalities use to estimate property base values could be used by energy providers. What is the average energy consumption of properties with similar square footage and of similar vintage in the area? Round up by 10% (given the trend towards electric vehicles and other technologies) and you've got a reasonable number to work with. Don't make it complicated or we'll end up with bigger bureaucracies and more red tape, appeals and costs.

1c): 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.).

Response:

This is where we start to agree with our Solar Club. They say that if people were allowed to send all their extra solar power to the grid, this wouldn't even be needed: no red tape, no breathing down our necks. Failing that, then showing proof like a receipt or agreement for energy-hungry gizmos like electric vehicles or heat pumps should suffice.

1d): 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.

Response:

From the paperwork we inherited, it appears that the companies installing these systems 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. It would make the most sense to have a code of best practice for installers, and possibly to have a professional organization that self-regulates the industry. We don't need the government to do this; the market can do it.

And of course if residential solar power producers were allowed to freely produce and share power, those calculations wouldn't be strictly necessary. But it's right that customers should be given the numbers so they understand what their system is expected to do and can make informed choices.

Question 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-GenerationRegulation? Please provide an example.

Response:

This is where it starts to sound like government overreach. We don't need bureaucrats reading our meters and monitoring our use and punishing us for turning down our thermostats or getting rid of our televisions. As we understand it, the rules are in place to make sure that people install reasonably-sized systems. The operative word in the regulation being "intended" — not "actual, year after year".

We don't need more red tape. We need more rooftop solar. So in our view the focus of the AUC should be on how the original systems are planned, and the data that go into that process. Once a household has got its solar array, the government's involvement should be over. Let us live our lives without constant audits, form-filling or letters telling us to remove a panel or face the consequences.

Frankly, the best thing would be simply to let people produce and send as much energy into the grid as they want. There should be no need for extra inspections or monitoring after installation.

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.).

Response:

What is this "compliance" thing? This sounds offensive; nobody puts solar panels on their roof in order to do wrong. Once a system has been properly designed, sized and installed, any "post-approval compliance monitoring" should be solely the responsibility of the consumer, in consultation with their utility partner. We don't need Big Brother monitoring our lifestyle choices.

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.

Response:

This sounds like a solution looking for a problem. There is no problem. 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 more than enough.

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 sounds like a waste of time and money, and wildly out of whack with our government’s expressed interest in reducing red tape and reducing the cost of living for Albertans.

a): Should micro-generators be permitted to de-rate their inverters, subject to the previously described limitation? Please provide an explanation.

Response:

Existing rules and approval steps manage system sizing, so there’s no need to limit or restrict inverter settings. Non-problem.

Question 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.

Response:

Regulators should be making it easier, not harder, for people to go solar. Adding an extra sizing step at the beginning might sound helpful, but in practice, it’s likely to make a lot of people give up before they even apply.

Installers should be held to a consistent standard for calculating system size. If they follow a shared code of conduct, possibly through mandatory membership in a professional organization not unlike other industries have, that would go a long way in keeping things fair and accurate without discouraging consumers.

Question 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.

Response:

We don't feel qualified to answer this other than to say a professional regulatory body for installers seems like the best non-bureaucratic solution. Probably a working group would be helpful. It would make sure that as equipment standards change the rules keep up.

It might be helpful every so often to get utilities, installers, regulators, and others in the same room to identify and solve problems faster and more practically, as long as they are working to the same end: increasing solar.

5a): 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.

Response:

Keep it seldom (maybe annually or every two years). Meetings are costly and inefficient, for the most part.

5b): If no, please suggest a different way that the AUC can keep abreast of changing technical standards.

Response:

We don't feel qualified to answer this. If there were a professional installers organization, they would be the best ones to ask.

Question 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.

Response:

From what we can see, Alberta's solar rules are also an Alberta success story that have.helped thousands of homeowners, businesses, and farmers add solar to their rooftops and reduce their energy costs. Our Solar Club says, and we can't see any reason to disagree, that Alberta's model is the best in the country because we consumers get paid the same rate for energy we send to the grid as we pay for the grid energy we use, and that's fair.

In rural areas especially, long wait times for approvals are already a problem. If the AUC adds more steps or red tape, it will just slow things down more. That's the opposite of what we need.

In conclusion: the system works. Don’t tie it up in red tape. Keep the focus on right-sizing systems at the outset and then step back and leave it to us to manage our own energy decisions. Plan for success, don’t hover around looking for failures. We don’t need more red tape; we need more rooftop solar. Work from that perspective.

Thanks for the chance to provide input.

Gail and Kevin Van Tighem.

cc: Chelsae Petrovic, MLA Livingstone-Macleod