

Folks,

Thanks for the opportunity to engage. I would be happy to be part of a working group or anyone continuing to work in this direction.

### **Question 1: Standardizing Consumption and Output Calculations**

#### **Response:**

Yes, a standardized methodology is helpful but only if it simplifies and empowers customers. Any system should:

- Account for past variability (especially for farms and rural users).
- Allow the use of either the last 12 months or a 5-year average—whichever better reflects the customer's needs.

That said, if you allowed unlimited self-supply and export, most of this would become unnecessary. Letting people build to the size of their roof (rather than their historical usage) removes the guesswork and aligns with real-world investment logic.

I also want to emphasize that accurate information is key. I once spent months tracking down a billing spike—only to find it was due to a minor timing mismatch. No one in the billing chain could explain it clearly. If we're going to ask people to calculate energy output and usage, we must give them access to the same tools and details that energy companies use.

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

#### **Response:**

I strongly oppose post-approval compliance monitoring for residential micro-generators. It adds fear, complexity, and uncertainty, and it's not clear what benefit it would offer.

If someone over-builds, the utility can already limit what they export through interconnection agreements. The threat of having to downgrade or remove panels after installation would scare people off entirely. We should be encouraging micro-generation, not discouraging it through layers of technical audits.

Again, if the goal is to prevent gaming the system, just allow full self-supply and export. That way, no one is penalized for being efficient or having seasonal usage patterns.

### **Question 3: Inverter De-Rating and Enforcement**

#### **Response:**

There's no need for new enforcement mechanisms or inverter de-rating policies. Inverters are already configured by installers and manufacturers, and interconnection agreements already limit what's exported to the grid. If someone wants to increase their system size, they're required to go through permitting again, so the tools to manage this already exist.

And honestly, what's the problem with "cheaters"?

Let's say someone "cheats" by oversizing their system. Best case? They just did a great job reducing their own usage and are now a net exporter. That's a win, for them and the environment. Worst case? They produce more power than they use and sell the excess to the grid at market or near-market rates. That's still a win. As long as safety and reliability standards are met, they're helping Alberta decarbonize and diversify our energy sources.

If that threatens existing energy providers, that's competition. Isn't that supposed to be a good thing?

If there are valid concerns about externalities (like improper disposal of panels or inappropriate urban siting) those can and should be handled separately:

- Do we have a green disposal program for panels? Let's create one.
- Are there zoning rules to prevent someone from building a solar farm in a downtown backyard? There already are, and they're working.

But trying to clamp down on small-scale rooftop users in case they might "win too hard" feels backwards. Let's focus on enabling success, not regulating against it.

### **Question 4: Pre-Application System Sizing Determination**

#### **Response:**

No, this would create more red tape and discourage participation.

Alberta's success in rooftop solar comes from keeping the process as simple as possible. Adding a pre-screening step might help utilities, but it sends a message to the public that this is a risky or overly complicated process.

Instead, empower reputable installers (via Solar Alberta, for example) to follow consistent sizing practices. The application process should remain streamlined, not more fragmented.

### **Question 5: Technical Standards Working Group**

**Response:**

Yes, a working group is a great idea.

Things like inverter specs change often, and it's not reasonable to expect homeowners or even every installer to stay on top of shifting guidance. A working group with regular meetings would keep everyone on the same page and reduce confusion.

Quarterly meetings seem reasonable unless there's a lot of change. The group could also cover related technologies like battery systems, smart meters, and interconnection protocols.

**Question 6: Other High-Priority Issues****Response:**

The billing structure for non-usage-based fees needs reform. As a homeowner who tracks utility bills closely, I was shocked at how difficult it was to get answers about a basic line item. My retailer couldn't explain it. It took multiple calls, emails, and escalations to reach someone who had the real data. That shouldn't happen.

If the market is going to function, customers need access to clear, accurate billing details. Right now, that transparency doesn't exist—and privatized billing makes it worse. Retailers aren't incentivized to help, because they're just passing through charges they don't control.

Two potential solutions:

- Bill non-usage charges directly from the provider, not the retailer.
- Create a centralized public billing breakdown tool, where anyone can enter their usage and dates and get the exact rate rider or sub-fee calculation.

The market only works when people understand what they're buying.

Thanks!

Matt Bouchard