I wish to comment specifically on the sizing of a solar installation, the limitations of the current requirements, and an alternative to both the current rules and the proposed changes. I have been a micro-generator for the past four years, generating about 98% of my net power requirements. The import/export structure currently in place is what has made this system viable. Still, there were frustrations in the application process which could have been streamlined, as well as limitations which prevented me from making a more efficient investment when considered over an extended period of time.

The intent of the sizing requirement: I fully endorse the intent that micro-generators be limited to producing power for their own net use. If the intent is to produce excess power for financial return it becomes a commercial enterprise, and should be subject to the same rules as any other utility provider.

The problems created by the current sizing requirements: There are good reasons for installing a system with higher capacity than indicated by historical usage, such as the future addition of an EV charger, or the intended switch to an electric heat-pump or geothermal heating system. And when the solar installation is on a new-build there is often no applicable historical data to support annual usage. It makes no sense to build first, wait for a year of data, and then retro-fit a solar installation on the building.

A proposed solution: Do not limit the size of the installation to historical usage. Instead, limit the amount of payback a microgenerator can receive. Monitoring the import and export of power is very simple. I would suggest that any time exported power exceeds imported power over the previous twelve-month period, the microgenerator should receive reduced payment for the excess power, bringing it in line with what a commercial producer would receive for production of that power. And if exported power exceeds imported by more than a certain amount (say 20%) there should be no payment at all, as this is crossing over into a commercial enterprise, and therefore should be subject to the same regulatory requirements as the major producers are required to abide by.

What this would accomplish: This would incentivize the owner of the system, under the guidance of the designer/installer, to make an intelligent choice in the capacity of the installation, based on reasonable future expectations. It would allow for more cost-effective long term investment. It would also likely increase overall solar capacity In my

case, it would have allowed my to increase the capacity to allow for the future addition of an EV charger. This was not permissible at the time. To add that capacity now is not cost-effective. In the case of my son, who has recently developed an acreage, it would have allowed him to add solar panels to the newly-built shed at the time of construction, rather than waiting for a year of data so that he can apply for a permit.

And what else would it accomplish? It would reduce the regulatory requirements, the approval timeframe, and therefore the cost of solar installation. Equally important, it would allow Albertans to exercise their rights and desires to make intelligent choices for themselves on how they express their environmental responsibility as well as how they invest their money, while still ensuring that individuals do not receive unfair advantage over other citizens in the choices they make.