

Stakeholder comments on AUC Rule 024: Proposed changes

Stakeholders: AESO, Alberta Federation of REAs, ATCO Electric, ENMAX Corporation, EPCOR (Distribution, Energy Alberta, Encor), Environment & Parks, FortisAlberta, Howell Mayhew Engineering, Market Surveillance Administrator, SkyFire Energy Inc., Utilities Consumer Advocate

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1 Definitions	<p>1 Definitions</p> <p>In these rules,</p> <p>(a) “Act” means the Electric Utilities Act;</p> <p>(b) “applicable owner” means the owner of an electric distribution system in whose service territory the relevant micro-generation unit and interconnection of that unit is proposed or located;</p> <p>(c) “Commission” means the Alberta Utilities Commission;</p> <p>(d) “customer” means a person purchasing electricity for the person’s own use;</p> <p>(e) “inverter” means an electronic device that converts DC electricity into AC electricity;</p> <p>(f) “micro-generation generating unit” has the meaning ascribed in the Micro-Generation Regulation.</p> <p>(g) “notice of application” means a micro-generation project notice provided by the customer to the applicable owner in</p>	<p>1 Definitions</p> <p>In these this rules,</p> <p>(a) “Act” means the Electric Utilities Act;</p> <p>(b) “applicable owner” means the owner of an electric distribution system in whose service territory the relevant micro-generation unit and interconnection of that unit is proposed or located;</p> <p>(a) “aggregated sites” means aggregated sites as defined in the Micro-Generation Regulation;</p> <p>(ba) “Commission” means the Alberta Utilities Commission;</p> <p>(cb) “customer” means a person purchasing electricity for the person’s own use has the meaning set out in the Electric Utilities Act;</p> <p>(de) “inverter” means an electronic device that converts DC electricity into AC electricity;</p> <p>(ed) “micro-generation generating unit” has the meaning ascribed means a micro-generation generating unit as defined in the Micro-Generation Regulation.</p>	<p>AESO:</p> <p>1(f) - The AESO suggests the following revision to Section 1(f): “micro-generation notice” means a notice provided by the customer to the owner in accordance with Section 2(1) or 2.1(1) of the <i>Micro-Generation Regulation</i> and this rule;</p> <p>1(g) - The AESO notes that there is no “notice” referenced in Sections 4(3) and 4(3.1) of the <i>Micro-Generation Regulation</i>.</p> <p>1(h) - The AESO suggests that Section 3(5)(b) of the <i>Micro-Generation Regulation</i> be referenced in Section 1(h). In addition, the AESO notes that there is no “notice” referenced in Section 3(5) of the <i>Micro-Generation Regulation</i>.</p>	<p>While the Commission acknowledges the AESO’s comment, the term “micro-generation notice” is used to provide clarity to both customers and owners.</p> <p>Agreed, there is no reference to a “notice” in Sections 4(3) and 4(3.1). However, the notice referenced in 1(g) is to the form to be used by the owner to bring the matters referenced in Sections 4(3) and 4(3.1) to the Commission.</p> <p>Agreed, there is no reference to a “notice” in Section 3(5)(b). However, the notice referenced in 1(h) is to the form to be used by the owner to bring the matters referenced in Section 3(5)(b) to the Commission.</p>

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	<p>accordance with Section 2(1) of the regulation and in the form set out in Form A - Generation project (less than 1 MW) notice;</p> <p>(h) “notice of complaint” means a notice prepared by the customer and filed with the Commission in accordance with Section 3(5) of the regulation and in the form set out as Form C - Notice of complaint;</p> <p>(i) “notice of dispute” means a notice prepared by the applicable owner and filed with the Commission in accordance with Section 2(2) or Section 4(3) of the regulation and in the form set out in Form B - Notice of dispute;</p> <p>(j) “owner” means the owner of an electric distribution system;</p> <p>(k) “regulation” means the Micro-Generation Regulation, Alta. Reg. 27/2008.</p>	<p>(fe) “micro-generation notice of application” means a micro-generation project notice provided by the customer to the applicable owner in accordance with Section 2(1) of the regulation and in the form set out in Form A - Generation project (less than 1 MW) notice or 2.1(1) of the <i>Micro-Generation Regulation</i> and this rule;</p> <p>(g) “notice of dispute” means a notice prepared by the owner and filed with the Commission in accordance with Section 2(2) or 2.1(2) or Section 4(3) or 4(3.1) of the <i>Micro-Generation Regulation</i> and this rule;</p> <p>(h) “notice of complaint” means a notice prepared by the customer and filed with the Commission in accordance with Section 3(5) of the <i>Micro-Generation Regulation</i> and in the form set out as Form C - Notice of complaint this rule;</p> <p>(i) “notice of dispute” means a notice prepared by the applicable owner and filed with the Commission in accordance with Section 2(2) or Section 4(3) of the regulation and in the form set out in Form B - Notice of dispute;</p> <p>(ii) “owner” means the owner of an electric distribution system in the service area where the customer plans to construct or alter and operate a micro-generation generating unit.</p> <p>(k) “regulation” means the Micro-Generation Regulation, Alta. Reg. 27/2008.</p>	<p>1(i) – The AESO would like to clarify whether “electric distribution system” and “service area” are as defined in the <i>Electric Utilities Act</i>.</p> <p>ATCO Electric: ATCO Electric agrees with the proposed changes to the definitions section.</p> <p>FortisAlberta: FortisAlberta has no comments.</p> <p>Market Surveillance Administrator: To avoid uncertainty of how the <i>Micro-Generation Regulation</i> is interpreted, the MSA believes that there exists an opportunity to clarify what “nameplate capacity” means in relation to AC/DC ratings of solar generators. The MSA recommends the Alberta Utilities Commission create such clarity by incorporating the appropriate AC/DC language into either Rule 24 or the Micro-Generator Application Process & Guidelines (Preferably in Rule 24). For solar units this can be done by Clarifying</p>	<p>The <i>Electric Utilities Act</i> defines both “electric distribution system” in Section 1(m) and “service area” in Section 1(ww). Unless a regulation states a contrary intention, which is not the case in the <i>Micro-Generation Regulation</i>, the definitions in the <i>Electric Utilities Act</i> apply to the terms used in the regulation, in accordance with Section 13(b) of the <i>Interpretation Act</i>.</p> <p>The wording in the <i>Micro-Generation Regulation</i> refers to a micro-generation generating unit that has a total nameplate capacity that does not exceed 5 MW or the rating of the customer’s service. The term nameplate capacity is not defined. Any clarification regarding “nameplate capacity” in relation to AC/DC should be directed to the Department of</p>

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			<p>that “nameplate capacity” means either the DC nameplate rating of the generator or the AC nameplate rating of the inverter. Although the MSA has a view of which interpretation best meets the plain language reading of the <i>Micro-Generation Regulation</i>, the MSA is satisfied if the AUC simply clarifies to industry how the <i>Micro-Generation Regulation</i> should be interpreted (AC or DC)</p>	<p>Energy. If the owner questions the rating of a micro-generation generating unit and files a notice of dispute in relation to the qualification of the micro-generation generating unit, the Commission will determine the issue.</p> <p>The micro-generation notice included in Rule 024 has been revised to show that the capacity rating is in a.c.</p>
<p>2 Micro-generation application requirements</p>	<p>2 Micro-generation application requirements</p> <p>(1) If the customer plans to construct a micro-generation generating unit solely to meet all or a portion of its electricity needs, and the unit’s generating capability is rated at less than or equal to one megawatt, the customer may proceed without filing an application to the Commission. Instead, the customer must inform the owner of its plan to construct a micro-generation generating unit and use the notice of application as its application form for connection approval by the owner.</p> <p>(2) The customer must ensure no person is directly and adversely affected by the construction or operation of the micro-generation generating unit and there is no adverse effect on the environment, including noise. Customers must be in</p>	<p>2 Micro-generation application requirements Exemption from application and micro-generation notice requirements</p> <p>(4) A If the customer who plans to construct or alter and operate a micro-generation generating unit solely to meet all or a portion of the customer’s total energy consumption—its electricity needs, and the unit’s nameplate capacity generating capability is rated at less than or equal to one does not exceed five megawatts, and who intends to connect the unit to the interconnected electric system the customer may proceed without filing an power plant application under Rule 007: <i>Applications for Power Plants, Substations, Transmission Lines, Industrial System Designations and Hydro Developments</i> to the Commission if. Instead, the customer must inform the owner of its plan to construct a micro-generation generating unit and use the notice of application as its application form for connection approval by the owner.</p> <p>(a) the construction or alteration and operation of the unit</p> <p>(i) does not directly and adversely affect any person,</p>	<p>AESO:</p> <p>It is unclear to the AESO who is responsible for monitoring whether a micro-generation generating unit that is altered after it is installed exceeds the customer’s total energy consumption. Is it the AESO, the AUC or another party?</p> <p>The AESO suggests the following amendments to Section 2: “A customer who plans to construct or alter and operate a micro-generation generating unit to meet all or a portion of the customer’s total energy consumption, where the unit’s nameplate capacity does not exceed five megawatts, and who intends to connect the unit to the interconnected electric system may proceed without filing a power plant application under Rule 007: <i>Applications for Power Plants, Substations, Transmission Lines, Industrial System Designations and Hydro Developments</i> with the Commission if the construction or</p>	<p>If a micro-generation generating unit is altered, the customer must give notice to the owner. Unless the owner files a notice of dispute, the AUC is not informed of the alteration. As stated below, the AUC may review compliance with Rule 024.</p> <p>The AUC will change Section 2 to read as follows: “...Rule 007: <i>Applications for Power Plants, Substations, Transmission Lines, Industrial System Designations and Hydro Developments</i> to the Commission if the construction or alteration and operation of the unit</p> <p>(a) does not directly and adversely affect any person,</p> <p>(b) does not have any</p>

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	<p>compliance with the environmental and noise impact assessment requirements of AUC Rule 007: <i>Applications for Power Plants, Substations, Transmission Lines, and Industrial System Designations</i> and AUC Rule 012: <i>Noise Control</i>.</p>	<p>(ii) does not have any adverse environmental impact; and</p> <p>(iii) the unit is constructed or altered and operated, in compliance with Rule 012, <i>Noise Control</i>.</p> <p>(2) The customer must ensure no person is directly and adversely affected by the construction or operation of the micro-generation generating unit and there is no adverse effect on the environment, including noise. Customers must be in compliance with the environmental and noise impact assessment requirements of AUC Rule 007: <i>Applications for Power Plants, Substations, Transmission Lines, and Industrial System Designations</i> and AUC Rule 012: <i>Noise Control</i>.</p>	<p>alteration and operation of the unit</p> <p>(a) does not directly and adversely affect any person,</p> <p>(b) does not have any adverse environmental impact; and</p> <p>(c) the unit constructed or altered and operated, in compliance with Rule 012, <i>Noise Control</i>.</p> <p>ATCO Electric:</p> <p>ATCO Electric suggests the section title should be “Exemption from Rule 007 application requirements”. The phrase micro-generation notice requirements should be struck from the section title since customers are not exempt from providing notice to the owner as required by the regulation and Rule 024.</p> <p>ATCO Electric requests that throughout Rule 024 the phrase “nameplate capacity” is amended to “total nameplate capacity” to remain consistent with the <i>Micro-generation Regulation</i>. [Emphasis added]. This is to recognize that multiple generating units may be installed at a single site, if they are connected to the same meter.</p> <p>In addition, ATCO Electric notes that the new Section 3, Micro-generation notice submission process, directs customers to consult with stakeholders in accordance with Appendix A1. Given this, should</p>	<p>adverse environmental impact; and</p> <p>(c) the unit is constructed or altered and operated, in compliance with Rule 012, <i>Noise Control</i>.”</p> <p>Agreed. The AUC will change the header to Section 2 to read as follows: “Exemption from power plant application”.</p> <p>Agreed. For consistency and clarification, the AUC will change the phrase “nameplate capacity” to “total nameplate capacity” throughout Rule 024.</p> <p>No change is needed in Section 2 (a) (i) because a customer must meet the requirements of Rule 024, including notification and consultation, before</p>

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			<p>2(a)(i) read as follows: “does not directly and adversely affect any person, as determined through consultation with stakeholders in accordance with Appendix A1 – Participant involvement program guidelines of Rule 007,” [Emphasis added].</p> <p>Environment & Parks: It is noted that in section 2 (a) (ii) it identifies that a project would only qualify for microgen application if it “does not have any adverse environmental effect”. How does the AUC intend to confirm that there is no adverse effect? We know that (Depending on location) 2 industrial scale wind turbines (which could still be under 5 MW) can have significant impact on birds/bats if sited in a poor location. Will this be part of AUC’s assessment and/or expectation of the proponent?</p> <p>It is noted that in FORM A there is a question that the proponent needs to answer on “Have you met all applicable environmental requirements”. Can AUC please clarify what environmental</p>	<p>determining whether the customer is exempt from the filing of a power plant application under Rule 007.</p> <p>Without conducting notification and consultation, a customer cannot ensure that a person is not directly and adversely affected and making a statement to that effect.</p> <p>If a micro-generation generating unit has the potential to adversely impact the environment, there is no exemption from the filing of a power plant application under Rule 007. The environmental requirements that a proponent should consider are set out in Rule 007.</p> <p>Section 2(a)(ii) provides an exemption to the filing of a power plant application under Rule 007. This section is not to determine whether the unit is a micro-generation generating unit.</p> <p>The onus is on the customer to identify the environmental effects of the micro-generation generating unit, including noise, air</p>

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			<p>requirements are being referenced here and how AUC will be reviewing this information on the form for adequacy (similar to the question above).</p> <p>What checks and balances will be in place to ensure that large industrial developers do not use this new microgen rule to avoid the more intensive requirements under Rule 007 (i.e. if a company has a 25 MW project, what would be in place to ensure that they do not submit 5 separate microgen projects to get around the increased efforts required under rule 007?).</p> <p>Under the EPEA – <i>Activities Designation Regulation</i>, power plants are roughly defined as a facility with an installed a capacity of >1 MW and release a substance into the environment. While renewables and alternative forms of generation (with the exception of biomass) don't have a substance release, our Operations staff are seeing examples of more conventional types of generation (use of large natural gas-fired reciprocating engines that were previously used in the UOG industry) that proponents are looking to re-purpose for electricity generation.</p> <p>AEP understands the intent of the rule and the micro-generation regulation is to encourage the development of small scale renewables and alternatives and meets a GHG emission intensity standard</p>	<p>emissions, or impacts on birds or bats. If a customer fails to do so, once the AUC becomes aware of this failure as a result of a complaint or compliance review, the AUC may conduct an enforcement investigation.</p> <p>The AUC may increase the scope of its compliance review program for micro-generation projects (and make customers and owners aware of the AUC's intention to engage in compliance or enforcement as required).</p> <p>The Commission is not aware of any micro-generation generating units using fossil fuels. For purposes of micro-generation, the units described in the comments appear not fall within the definition of micro-generation generating unit.</p>

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			<p>of 418 kg/MWh (in the micro-generation regulation), Section 2(a)(ii) is likely too vague. It also doesn't put the proper perspective on environmental requirements and needs to tie this into something more substantial. As mentioned previously, AEP's Operations staff are seeing proposals under 5 MW using conventional engines firing fossil fuels.</p> <p>FortisAlberta: FortisAlberta has no comments.</p> <p>Howell Mayhew Engineering: In favour</p>	
3 Application to supply electric energy	<p>3 Application to supply electric energy</p> <p>A customer who intends to supply electric energy to the interconnected electric system from a micro-generation generating unit shall complete a notice of application and shall serve the notice of application on the applicable owner.</p>	<p>3 Application to supply electric energy</p> <p>A customer who intends to supply electric energy to the interconnected electric system from a micro-generation generating unit shall complete a notice of application and shall serve the notice of application on the applicable owner.</p>	<p>ATCO Electric:</p> <p>ATCO Electric agrees this section can be deleted.</p> <p>Howell Mayhew Engineering:</p> <p>In favour</p>	
NEW 3 Micro-generation notice submission process		<p>3 Micro-generation notice submission process</p> <p>(1) Prior to filing a micro-generation notice with the owner, a customer must notify and consult with stakeholders, in accordance with Appendix A1- Participant involvement program guidelines of Rule 007, on the plan to construct or alter and operate a micro-generation generating unit.</p> <p>(2) A customer who intends to construct or alter and operate a micro-generation</p>	<p>AESO:</p> <p>The AESO suggests the following revision to Section 3(4): "If the owner does not dispute that the micro-generation generating unit qualifies as a micro-generation generating unit or in the event that the Commission decides that a disputed unit is a micro-generation generating unit, the customer must provide notice in writing to the customer's retailer or regulated rate option provider that the customer's micro-generation notice has been approved by the owner in</p>	<p>The proposed wording is not accepted because there is no approval by the owner or the Commission of the micro-generation generating unit. The wording in Section 3 refers to the owner either accepting or disputing the notice or in the event of a dispute, the Commission determines whether the unit is a micro-generation</p>

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		<p>generating unit shall complete a micro-generation notice, Form A, and send the completed notice and all supporting documents to the owner.</p> <p>(3) Within 14 days of the receipt of a micro-generation notice, the owner shall</p> <p>(a) notify the customer of whether the notice and documents are complete;</p> <p>(b) if the notice and the required documents are complete,</p> <p>(i) notify the customer that the owner accepts the notice and confirm the connection date of the micro-generation generating unit; or</p> <p>(ii) notify the customer that the owner is disputing the qualification of the micro-generation generating unit.</p> <p>(4) If the owner does not dispute that the micro-generation generating unit qualifies as a micro-generation generating unit or in the event that the Commission decides that a disputed unit is a micro-generation generating unit, to receive credit compensation for micro-generation, the customer must provide notice in writing to the customer's retailer or regulated rate option provider.</p>	<p>order to receive credit compensation for micro-generation.”</p> <p>ATCO Electric:</p> <p>ATCO notes that Section 3(a) be revised to:</p> <p>“notify the customer of whether the notice and required documents are complete”</p> <p>To remain consistent with the remainder of item 3. [Emphasis added].</p> <p>ATCO Electric requests that proposed section 3(3)(b)(i) be revised to:</p> <p>“notify the customer that the owner accepts the notice and inform the customer of the estimated connection date of the micro-generation generating unit; or”.</p> <p>There are many factors that determine the connection date for a micro-generating unit, most of which are outside the owner’s control. It is not possible to “confirm the connection date” at the time the notice is accepted. ATCO Electric can however, estimate the connection date, subject to the micro-generation customer’s readiness to connect. [Emphasis added].</p>	<p>generating unit. The term “regulated rate option provider” in Section 3(4) is changed to “regulated rate provider” in keeping with the <i>Electric Utilities Act</i>.</p> <p>Agreed. To remain consistent with the language used throughout Section 3, the AUC will revise Section 3(a) to read as follows: “(a) notify the customer of whether the notice and required documents are complete;”.</p> <p>Acknowledged. The AUC will revise Section 3(3)(b)(i) to read as follows: “notify the customer that the owner accepts the notice and inform the customer of the estimated connection date of the micro-generation generating unit; or”.</p>

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			<p>ENMAX Corporation: Re: 3(1) Given that the vast majority of MG installations are likely to be small scale rooftop solar systems, imposing a requirement to follow Rule 007 Appendix A1 PIP guidelines is not an efficient use of time and effort and will add costs and delays to projects. It would make more sense to have the permitting authority (e.g. municipality, county, etc.) guidelines be the criteria required for participant involvement. For example, many municipalities already have bylaws in place to deal with micro-generation that have established the appropriate level of participant involvement to be permitted. As such we recommend removing the question “* Have you completed the participant involvement program stated in AUC Rule 007?” from the Notice Form as the issue is covered by the first question in the same section with regards to municipal requirements.</p>	<p>The AUC maintains that before any electric facility, including a micro-generation generating unit, in Alberta is developed, effective communication should take place among stakeholders by way of a PIP so that concerns may be raised, properly addressed, and if possible, resolved. All persons whose rights may be directly and adversely affected by a proposed electrical development or micro-generation project must be informed of the potential development, have an opportunity to voice their concerns and an opportunity to be heard.</p> <p>Listed in Appendix A1 of Rule 007 are guidelines that the developer, or the customer in the case of micro-generation, should consider when creating its PIP which may involve public notification and consultation. The precise extent and scope of a PIP cannot be predetermined because each development or micro-generation project is unique and may present circumstances that must be addressed on an individual basis. Notwithstanding, in</p>

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			<p>Re: 3(3) Confirmation of the connection date is not possible due to a number of project variables (including that we cannot control when the customer's site will be ready). A more appropriate statement would be:</p> <p>"i) notify the customer that the owner accepts the notice and provide an approximate connection date of the micro-generation generating unit;"</p> <p>FortisAlberta: FortisAlberta has no comments.</p> <p>Howell Mayhew Engineering: <u>Section 3(1)</u> I agree with the Participant Involvement Programme for generating units that are noisy and that produce high traffic levels</p>	<p>general, for micro-generation generating units of less than 1 MW in urban areas and up to 5 MW in the rural areas, the recommended minimum PIP may involve public notification as outlined in Section 5 of the Appendix A1 of Rule 007. Whereas for micro-generation generating units of more than 1 MW in urban areas, the recommended minimum PIP may involve public notification and consultation as outlined in the same Section 5.</p> <p>Acknowledged, as noted above, the AUC will revise Section 3(3)(b)(i) to read as follows: "notify the customer that the owner accepts the notice and inform the customer of the estimated connection date of the micro-generation generating unit; or".</p> <p>As noted above, the AUC will not exclude small micro-generation solar PV system from the PIP requirements of Rule 007 because PIP</p>

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			<p>and high amounts of environment emissions.</p> <p>However, solar PV systems are not noisy. Solar PV systems are regulated through the development permit process in most municipalities. I recognise that some municipalities don't have development permit processes.</p> <p>Aren't the development permit processes acceptable to the AUC – regardless of what is the development permit process? I have the following issues for 3(1):</p> <p>a) for PV systems that are hidden away for no-one to see, why should they require a Participant Involvement Programme? No-one can see them or hear them. Reflection is not an issue at all.</p> <p>b) Why should a Participant Involvement Programme be required when a municipality's development permit has been granted?</p> <p>c) It seems to be rather over the top for a Participant Involvement Programme to be done for a PV system mounted on a house roof. Who cares that it happens to generate electricity and be mounted on a roof. We don't need to ask for provincial regulatory approval for skylights or re-shingling roofs... which have the same effect on neighbours.</p> <p>Would it be OK for the AUC to accept the decision of a municipality's development permit process and not require a Participant Involvement Programme? Who is going to enforce the Participant Involvement Programme requirement? If someone doesn't do a Participant</p>	<p>requirements may be tailored to meet specific situations. As noted above, the AUC maintains that before any electric facility, including a micro-generation generating unit, in Alberta is developed, effective communication should take place among stakeholders by way of a PIP so that concerns may be raised, properly addressed, and if possible, resolved. All persons whose rights may be directly and adversely affected by a proposed electrical development or micro-generation project must be informed of the potential development, have an opportunity to voice their concerns and an opportunity to be heard.</p> <p>Listed in Appendix A1 of Rule 007 are guidelines that the developer or customer should consider when creating its PIP which may involve public notification and consultation. The precise extent and scope of a PIP cannot be predetermined because each development or micro-generation generating unit is unique and may present circumstances that must be addressed on an individual basis. Notwithstanding, in general, for micro-generation units of less than 1 MW in urban areas and up to 5 MW</p>

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			<p>Involvement Programme then who cares? Why not put in some clause that says what the applicant should do afterwards (for solar PV systems mounted on roofs or walls) if someone objects?</p> <p><u>Section 3(3)</u></p> <p>I am concerned that a pedantic WSP that is just wanting to be nasty will say that they will only communicate with the customer. I think the WSP should be communicating with the Micro-Generation Notice applicant, not the customer. Is there some way to say that an applicant is the same as the customer, for the application purposes?</p> <p><u>Section 3(3)</u></p> <p>What is going to happen WHEN (not if) the WSP does not respond within 14 days? Some of them have been clueless about this requirement.</p>	<p>in the rural areas, the recommended minimum PIP is public notification as outlined in Section 5 of the Appendix A1 of Rule 007. Whereas for micro-generation units of more than 1 MW in urban areas, the recommended minimum PIP is public notification and consultation as outlined in the same Section 5.</p> <p>The term “customer” is used to be consistent with the language used in the <i>Micro-Generation Regulation</i>.</p> <p>In Section 3(1) of the <i>Micro-Generation Regulation</i>, “...the owner must within a reasonable time ensure that meters suitable for net billing are installed at the customer’s micro-generation site.” Owners have processes in place to ensure reasonable connection timelines are met. Further, as per Section 7 of Rule 024,</p>

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			<p>SkyFire Energy Inc.</p> <p>(1) Regarding Rule 007 Participant Involvement Program guidelines – For small solar PV systems, the only impact on neighbours is with regards to aesthetics. Aesthetics of solar PV installations are governed and controlled by municipal bylaw requirements. It is redundant for the AUC to require additional consideration in this regard. In particular, notification of neighbours regarding a small rooftop solar array or flat roof solar array (that may not even be visible from the street or neighbouring properties in many cases) is unnecessary. Participant Involvement programs can add unnecessary and redundant cost to solar installations. Decreasing ‘soft costs’ is one of the greatest opportunities for cost reduction and therefore wider spread adoption of solar PV technology. Would the AUC consider excluding Small Micro-Generation solar PV systems from the PIP requirements of Rule 007?</p>	<p>“With respect to a notice of dispute or notice of complaint filed with the Commission, the Commission will determine the process for the notice.”</p> <p>As noted above, the AUC will not exclude small micro-generation solar PV system from the PIP requirements of Rule 007 because PIP requirements may be tailored to meet specific situations. As noted above, the AUC maintains that before any electric facility, including a micro-generation generating unit, in Alberta is developed, effective communication should take place among stakeholders by way of a PIP so that concerns may be raised, properly addressed, and if possible, resolved. All persons whose rights may be directly and adversely affected by a proposed electrical development or a micro-generation project must be informed of the potential development, have an opportunity to voice their concerns and an opportunity to be heard.</p> <p>Listed in Appendix A1 of Rule 007 are guidelines that the developer or customer</p>

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			<p>(2) Can “Customer” be changed to applicant so that the entity submitting the application can be the one to receive the notification?</p>	<p>should consider when creating its PIP which may involve public notification and consultation. The precise extent and scope of a developer’s or customer’s PIP cannot be predetermined because each development or micro-generation project is unique and may present circumstances that must be addressed on an individual basis. Notwithstanding, in general, for micro-generation generating units of less than 1 MW in urban areas and up to 5 MW in the rural areas, the recommended minimum PIP requirement is public notification as outlined in Section 5 of the Appendix A1 of Rule 007. Whereas for micro-generation generating units of more than 1 MW in urban areas, the recommended minimum PIP requirements are public notification and consultation as outlined in the same Section 5.</p> <p>As noted above, the term “customer” is used to be consistent with the language used in the <i>Micro-Generation Regulation</i>.</p>

Section	Existing	Proposed changes	Stakeholder comments	AUC responses
			<p>Utilities Consumer Advocates:</p> <p>What are the obligations of the DFO to ensure reasonable connection timelines and to meet the dates that are agreed to? If those requirements are not stated in this rule then where will they be stated?</p>	<p>As noted above, in Section 3(1) of the <i>Micro-Generation Regulation</i>, "...the owner must within a reasonable time ensure that meters suitable for net billing are installed at the customer's micro-generation site." Owners have processes in place to ensure reasonable connection timelines are met. Further, as per Section 7 of Rule 024, "With respect to a notice of dispute or notice of complaint filed with the Commission, the Commission will determine the process for the notice."</p>
<p>4 Qualification as a micro-generation generating unit</p>	<p>4 Qualification as a micro-generation generating unit</p> <p>(1) If, following receipt of a complete notice of application from a customer, the applicable owner considers that the customer's proposed generating unit will not qualify as a micro-generation generating unit, the applicable owner shall complete a notice of dispute.</p> <p>(2) An applicable owner must serve a copy of the notice of dispute on the customer within 14 days of receipt of a complete notice of application, at the contact address and in the manner indicated in the notice of application.</p>	<p>4 Qualification as a micro-generation generating unit</p> <p>(1) If, following receipt of a completed micro-generation notice of application from a customer, if the applicable owner considers that the customer's proposed micro-generation generating unit will not qualify as a micro-generation generating unit, the applicable owner shall complete a notice of dispute, Form B, and send (2) An applicable owner must serve a copy of the notice of dispute on to the customer within 14 days of receipt of a complete notice of application, at the contact address in the manner indicated in the micro-generation notice of application. (23) An applicable owner shall file a notice of dispute with the Commission</p>	<p>AESO:</p> <p>The AESO suggests the following revision to Section 4: "Within 14 days of receipt of a completed micro-generation notice from a customer, if the owner considers that the customer's proposed micro-generation generating unit will not qualify as a micro-generation generating unit, the owner must complete a notice of dispute, Form B, and send a copy of the notice of dispute to the customer, at the contact address and in the manner indicated in the micro-generation notice, and must within 14 days of receipt of a completed micro-generation notice file its notice of dispute with the Commission through the Commission's eFiling System."</p>	<p>The word "shall" indicates that if there is a disagreement, a notice of dispute is to be filed.</p>

Section	Existing	Proposed changes	Stakeholder comments	AUC responses
	<p>(3) An applicable owner shall file a notice of dispute within 14 days of receipt of a complete notice of application. On receipt of the notice of dispute, the Commission shall, within 30 days or such longer period as the Commission considers necessary, issue its decision in accordance with the provisions of Section 2(3) of the regulation.</p>	<p>through the Commission's eFiling System within 14 days of receipt of a complete micro-generation notice of application.</p> <p>(3) On receipt of the notice of dispute, the Commission shall, within 30 days or such longer period as the Commission considers necessary, issue its decision in accordance with the provisions of Section 2(3) or 2.1(3) of the <i>Micro-Generation Regulation</i>.</p>	<p>ATCO Electric:</p> <p>ATCO Electric views that the current version of section 4 is clearer than the proposed version. ATCO Electric suggest that the current version of this section be retained and simply modified by removing four occurrences of the word “applicable”, and in Section 4(3) inserting “with the Commission through the Commission’s eFiling System” and adding reference to Section 2.1(3)</p> <p>EPCOR:</p> <p>Does the owner file a dispute if all or a portion of the electricity generated by the Microgen unit cannot be used on the owners distribution system?</p>	<p>While the Commission acknowledges ATCO Electric’s comments, the proposed language in Section 4 provides more clarity on the Commission’s processes for handling disputes and better aligns with the language contained in the <i>Micro-Generation Regulation</i>.</p> <p>The regulation does not limit the use of excess electricity solely to the distribution system. The owner cannot file a dispute because the <i>Micro-Generation Regulation</i> allows the customer to send any excess electricity to the interconnected electric system if it does not exceed the lesser of five MW or the rating of the customer’s service. Under section 4(3) of the regulation, the owner may file a notice of dispute for any extraordinary costs to connect the customer to the interconnected electric system and request that these costs be paid by the customer.</p>

Section	Existing	Proposed changes	Stakeholder comments	AUC responses
			<p>FortisAlberta: FortisAlberta has no comments.</p> <p>Howell Mayhew Engineering: Section 4(1) I am concerned that a pedantic WSP that is just wanting to be nasty will say that they will only communicate with the customer. I think the WSP should be communicating with the Micro-Generation Notice applicant, not the customer.</p> <p>What recourse does a customer have if the WSP doesn't properly install a bi-directional meter within a reasonable time frame? I have seen WSPs take 3 months because they forgot... Shouldn't a WSP be required to notify a customer re the amount of time it is going to take to install a bi-directional meter?</p> <p>What recourse does a customer have if the WSP is doing stupid things with the application – stalling, providing incorrect information, requiring information that is not in this Micro-Generation Notice, requiring transformer upgrades when you know darn well that they don't, asking for proof that you have notified the Energy Retailer and that the Energy Retailer accepted the notification – as a way to convince the customer to not put in a PV system? Does the AUC have a recommendation for a dispute or complaint action on this?</p>	<p>As noted above, in Section 3(1) of the <i>Micro-Generation Regulation</i>, "...the owner must within a reasonable time ensure that meters suitable for net billing are installed at the customer's micro-generation site." Owners have processes in place to ensure reasonable connection timelines are met. Further, as per Section 7 of Rule 024, "With respect to a notice of dispute or notice of complaint filed with the Commission, the Commission will determine the process for the notice."</p>

Section	Existing	Proposed changes	Stakeholder comments	AUC responses
			<p>SkyFire Energy Inc.</p> <p>(1) Can “Customer” be changed to applicant so that the entity submitting the application can be the one to receive the notification?</p>	<p>As noted above, the term “customer” is used to be consistent with the language used in the <i>Micro-Generation Regulation</i>.</p>
<p>5 Cost of interval meter</p>	<p>5 Cost of interval meter</p> <p>(1) If a customer has requested that a bi-directional interval meter be installed for its small micro-generation, and the applicable owner declines the request, the applicable owner shall notify the customer of its decision within 14 days following receipt of this request.</p> <p>(2) The notice required under Section 5(1) of these rules, declining the bi-directional interval meter request, shall be served on the customer at the contact address and in the manner indicated in the notice of application, and shall indicate the contact address and manner in which the applicable owner may be served.</p> <p>(3) On receipt of a notice declining the bi-directional interval meter request, the customer may apply to the Commission for an order requiring the applicable owner to comply with the customer’s request for the installation of a bi-directional interval meter by completing and filing with the Commission a notice of complaint.</p>	<p>5 Cost of bi-directional interval meter</p> <p>(1) If a customer has requested requests that a the installation of a bi-directional interval meter be installed for its small micro-generation under Section 3(2) of the <i>Micro-Generation Regulation</i>, and the applicable owner declines the request, the applicable owner shall notify the customer of its decision within 14 days following receipt of this request.</p> <p>(2) The notice required under Section 5(1) of these rules, declining the bi-directional interval meter request, shall be served on the customer at the customer’s contact address in the manner indicated in the notice of application, and shall indicate the contact address and manner in which the applicable owner may be served request, within 14 days following receipt of this request.</p> <p>(23) Within 14 days of the On receipt of a notice notification declining the bi-directional interval meter request, the customer may apply to the Commission for an order requiring the applicable owner to comply with the customer’s request for the installation of a bi-directional interval meter by completing and filing a notice of complaint, Form C, and filing it with the Commission through the Commission’s eFiling System a notice of complaint.</p>	<p>AESO:</p> <p>The AESO suggests the following revision to Section 5(1): “If a customer requests that a bi-directional interval meter be installed for its small micro-generation under Section 3(2) of the <i>Micro-Generation Regulation</i> [...]”</p> <p>Should Section 5(1), refer to Section 3(3) of the <i>Micro-Generation Regulation</i>, rather than Section 3(2)?</p> <p>Alberta Federation of REAs:</p> <p>Due to the impact on rural electrification associations (REA) as distribution system owners, it is imperative that we emphasize the following points as they apply to 5 and 6 of Rule 024:</p> <ul style="list-style-type: none"> The “customer” (based on the definition in the Electric Utilities Act) should be responsible for all costs such as, but not limited to, application, construction, operation, and maintenance of a Micro-Generation unit interconnected to an “owner’s” (as per definition in Rule 024 1. (j)) distribution system. 	<p>Acknowledged. The AUC will amend Section 5(1) to read as follows: “If a customer requests that the installation of a bi-directional meter for small micro-generation under Section 3(3) of the <i>Micro-Generation Regulation</i>, [...]”.</p> <p>Agreed. Section 5(1) will be revised as noted in the comment above.</p> <p>Rule 024 is consistent with the <i>Micro-Generation Regulation</i>. These comments are aimed at changes to the <i>Micro-Generation Regulation</i> and are best addressed to the Department of Energy which is responsible for the regulation.</p>

Section	Existing	Proposed changes	Stakeholder comments	AUC responses
	<p>(4) The notice of complaint must be filed with the Commission within 14 days following receipt of the notice declining the bi-directional interval meter request.</p> <p>(5) A copy of the notice of complaint must be served by the customer on the applicable owner.</p>	<p>(4) The notice of complaint must be filed with the Commission within 14 days following receipt of the notice declining the bi-directional interval meter request.</p> <p>(35) The customer shall send a copy of the notice of complaint to the owner at the owner's contact address in the manner indicated in the notification given by the customer on the applicable owner.</p>	<ul style="list-style-type: none"> Any upgrades or alterations to a distribution system required to accommodate a Micro-Generation connection, should be the cost of the "customer." Regardless of the owner – Investor Owned Utility (IOU) or REA – the Micro-Generation applicant should pay all costs to avoid the need for cost recovery through the rates of other consumers. <p>ATCO Electric: ATCO Electric notes a typographical error in the first sentence. The word "that" should be deleted. ATCO Electric agrees with the remainder of the proposed changes to this section.</p> <p>FortisAlberta: FortisAlberta has no comments.</p> <p>Howell Mayhew Engineering: In favour</p>	<p>Section 5(1) will be revised as noted in the comment above.</p>
<p>6 Extraordinary interconnection costs</p>	<p>6 Extraordinary interconnection costs</p> <p>(1) Following receipt of a complete notice of application from a customer, if the applicable owner considers the costs of connecting a customer's micro-generation generating unit to be extraordinary for the reasons set out in Section 4(3) of the regulation, the applicable owner shall file a notice of dispute with</p>	<p>6 Extraordinary interconnection costs</p> <p>(1) Following receipt of a complete micro-generation notice of application from a customer, if the applicable owner considers the costs of connecting a customer's micro-generation generating unit to be extraordinary for the reasons set out in Section 4(3) or 4(3.1) of the <i>Micro-Generation Regulation</i>, the applicable owner shall file a completed notice of dispute with Form B through the Commission's eFiling System within</p>	<p>AESO:</p> <p>The AESO cannot identify any provisions that set out what constitutes a "cost estimate", as referred to in Section 6(2). In addition, as there do not appear to be any timelines specified for creating a "cost estimate", it is unclear when the 14 day period referred to in Section 6(2) would begin.</p> <p>The AESO suggests the following revision to Section 6(1): "Following receipt of a</p>	<p>As noted above, the word "shall" indicates that if there is a disagreement, a notice of dispute is to be filed.</p>

Section	Existing	Proposed changes	Stakeholder comments	AUC responses
	<p>the Commission within 14 days from the date in which the applicable owner finalizes its cost estimate.</p> <p>(2) A copy of the notice of dispute shall be served on the customer, by the applicable owner, at the contact address and in the manner indicated in the notice of application within 14 days from the date in which the applicable owner finalizes its cost estimate.</p>	<p>14 days from the date in which the applicable owner finalizes its cost estimate.</p> <p>(2) The owner shall send a copy of the notice of dispute shall be served on to the customer, by the applicable owner, at the customer's contact address in the manner indicated in the micro-generation notice of application within 14 days from the date in which the applicable owner finalizes its cost estimate.</p>	<p>complete micro-generation notice from a customer, if the owner considers the costs of connecting a customer's micro-generation generating unit or changing the nameplate capacity of a micro-generation generating unit to be extraordinary for the reasons set out in Section 4(3) or 4(3.1) of the <i>Micro-Generation Regulation</i>, the owner must file a completed notice of dispute, Form B through the Commission's eFiling System within 14 days from the date in which the owner finalizes its cost estimate."</p> <p>Alberta Federation of REAs:</p> <p>Due to the impact on rural electrification associations (REA) as distribution system owners, it is imperative that we emphasize the following points as they apply to 5 and 6 of Rule 024:</p> <ul style="list-style-type: none"> • The "customer" (based on the definition in the Electric Utilities Act) should be responsible for all costs such as, but not limited to, application, construction, operation, and maintenance of a Micro-Generation unit interconnected to an "owner's" (as per definition in Rule 024 1. (j)) distribution system. • Any upgrades or alterations to a distribution system required to accommodate a Micro-Generation connection, should be the cost of the "customer." • Regardless of the owner – Investor Owned Utility (IOU) or REA – the Micro-Generation applicant should pay all costs to avoid the need for cost recovery through the rates of other consumers. 	<p>As noted above, Rule 024 is consistent with the <i>Micro-Generation Regulation</i>. These comments are aimed at changes to the <i>Micro-Generation Regulation</i> and are best addressed to the Department of Energy which is responsible for the regulation.</p>

Section	Existing	Proposed changes	Stakeholder comments	AUC responses
			<p>ATCO Electric: ATCO agrees with the proposed changes to section 6.</p> <p>FortisAlberta: FortisAlberta has no comments.</p> <p>Howell Mayhew Engineering: In favour</p> <p>Utilities Consumer Advocates: If a notice of dispute is filed what is the process for the customer and where is the process stated?</p>	<p>As per Section 7 of Rule 024, "With respect to a notice of dispute or notice of complaint filed with the Commission, the Commission will determine the process for the notice."</p>
<p>7 General provisions</p>	<p>7 General provisions</p> <p>(1) With respect to any application or complaint filed with the Commission pursuant to the regulation or these rules, the Commission will determine the process it considers appropriate to follow given the subject matter before it.</p> <p>(2) AUC Rule 021: Settlement System Code Rules shall apply, as required, to all transactions conducted under the regulation.</p> <p>(3) AUC Rule 007: Applications for Power Plant, Substations, Transmission Lines, and</p>	<p>7 General provisions</p> <p>(1) With respect to any application, a notice of dispute or a notice of complaint filed with the Commission pursuant to the regulation or these rules, the Commission will determine the process it considers appropriate to follow given the subject matter before it for the notice.</p> <p>(2) Rules 007 and 012 apply to a micro-generation generating unit.</p> <p>(3) AUC Rule 021: <i>Settlement System Code Rules</i> shall apply, as required, applies to all transactions conducted under the <i>Micro-Generation</i></p>	<p>AESO: The AESO suggests the following revision to Section 7(2): "AUC Rule 007: <i>Applications for Power Plants, Substations, Transmission Lines, Industrial System Designations and Hydro Developments</i> and AUC Rule 012: <i>Noise Control</i> apply to a micro-generation generating unit.</p> <p>ATCO Electric: ATCO agrees with the proposed changes to section 7</p>	<p>To remain consistent with the AUC's Style Guide, the proposed wording for Section 7(2) will not be changed.</p>

Section	Existing	Proposed changes	Stakeholder comments	AUC responses
	<p>Industrial System Designations, shall apply.</p> <p>(4) AUC Rule 012: Noise Control, shall apply.</p>	<p><i>Regulation.</i></p> <p>(3) AUC Rule 007: Applications for Power Plant, Substations, Transmission Lines, and Industrial System Designations, shall apply.</p> <p>(4) AUC Rule 012: Noise Control, shall apply.</p>	<p>EPCOR:</p> <p>EEA and Encor - Micro-generation credits should be at the same rate as applicable to the site. For example, if the site is enrolled on the Regulated Rate Option “RRO”, then the rate applicable for micro-generation credit should be the RRO rate. If the site is enrolled on a competitive rate, then the micro-generation credit should be at the competitive rate.</p> <p>Both EEA and Encor’s systems cannot handle the use of multiple rates for one site. There will be significant system enhancement costs if EEA and Encor had to use multiple rates or a rate different from the rate the site is billed at.</p> <p>FortisAlberta:</p> <p>FortisAlberta has no comments.</p> <p>Howell Mayhew Engineering:</p> <p><u>Section 7(3)</u></p> <p>I would recommend that Rule 021 be changed to mandate that exported electrical energy be required to have the same meter reading displayed on the bill as do the imported electrical energy readings. Presently, the imported electrical energy has the current meter reading, the previous meter reading, the amount of energy imported, the purchase price of the energy imported and the charge for the purchase of imported energy. We would never think of paying the bill if we didn’t know the amount of the commodity for which we are being</p>	<p>The compensation for micro-generation credits is done in accordance with Section 7 of the <i>Micro-Generation Regulation</i>.</p> <p>The compensation issue for aggregated sites has been brought forward to the Department of Energy for clarification.</p> <p>This topic was discussed at the June 17, 2015, AUC Rule 021 and Rule 028, meeting, and it was agreed that “the Rule 021 and Rule 028 Industry Consultation group does not have authority to make changes to the Billing Regulation, and such a proposal would need to be brought to the Department of Energy for consideration.”</p>

Section	Existing	Proposed changes	Stakeholder comments	AUC responses
			<p>charged... and yet the bills do not similarly have the following for the exported electrical energy: the current meter reading, the previous meter reading, the amount of energy exported, the purchase price of the energy exported and the credit for the sale of exported energy. Some bills only have the credit for the sale of exported energy !!! Some have the credit for the sale of exported energy as well as the amount of energy exported. No bill has all the same parameters as the energy imported. Why is this not mandated?</p> <p>Utilities Consumer Advocates:</p> <p>Does this mean the Commission will decide the process will be based on the complaint? Are there different complaint routes for different sizes of units of types of DG/ And where will this process be outlined?</p> <p>Is this when it is determined who will pay the extraordinary costs?</p>	<p>As per Section 7 of Rule 024, "With respect to a notice of dispute or notice of complaint filed with the Commission, the Commission will determine the process for the notice."</p> <p>The Commission would determine what is extraordinary.</p>
<p>NEW</p> <p>8 Retention of records</p>		<p>8 Retention of records</p> <p>(1) A customer shall retain, as long as the micro-generation generating unit is in operation,</p> <p>(a) all information on the participant involvement program conducted under Section 3(1) respecting the construction or alteration and operation of a micro-generation generating unit;</p>	<p>Alberta Federation of REAs:</p> <p>Please see the AFREA comments <u>underlined</u> below:</p> <p>8 Retention of records</p> <p>(1) A customer shall retain, as long as the micro-generation generating unit is in operation,</p> <p>(a) all information on the participant</p>	

Section	Existing	Proposed changes	Stakeholder comments	AUC responses
		<p>(b) all information and documents filed in support of a power plant application under Rule 007, if the micro-generation generating unit is not exempt from the filing of a power plant application;</p> <p>(c) the completed micro-generation notice and all supporting documents submitted to the owner under Section 3(2);</p> <p>(d) all documents related to a dispute under Section 4 or a complaint under Section 5;</p> <p>(e) all records pertaining to the construction or alteration and operation of the micro-generation generating unit.</p> <p>(2) An owner shall retain all information and documents pertaining to a customer's micro-generation generating unit, as long as the micro-generation generating unit is in operation.</p> <p>(3) The Commission may request from a customer or an owner the information or documentation required to be kept under this section.</p> <p>(4) A customer or an owner shall submit the information or documentation required to be kept under this section in accordance with the Commission's request.</p>	<p>involvement program conducted under Section 3(1) respecting the construction or alteration and operation of a micro-generation generating unit;</p> <p>(b) all information and documents filed in support of a power plant application under Rule 007, if the micro-generation generating unit is not exempt from the filing of a power plant application; <u>This doesn't make sense as if the customer has to file the application with the AUC then the AUC will have a copy of all the relevant documents in their system making this redundant.</u></p> <p>(c) the completed micro-generation notice and all supporting documents submitted to the owner under</p>	<p>An applicant must retain all information related to a proposal to construct and operate a power plant or any other facility. All information pertaining to an application under Rule 007 need not be filed with the AUC. For example, all communication with stakeholders does not have to be filed with an application. The Commission or a stakeholder may require this information at a later date. Another example is that an applicant may not file the manufacturer's specifications for a generating unit, but must retain such information. The AUC would not ask an applicant, including a customer, to file information which was already on the record of a proceeding.</p>

Section	Existing	Proposed changes	Stakeholder comments	AUC responses
			<p>Section 3(2);</p> <p>(d) all documents related to a dispute under Section 4 or a complaint under Section 5;</p> <p>(e) all records pertaining to the construction or alteration and operation of the micro-generation generating unit.</p> <p>(2) An owner shall retain all information and documents pertaining to a customer's micro-generation generating unit, as long as the micro-generation generating unit is in operation. <u>This section is too general. The owner should only be responsible for information and documents that are directly under their control. The AUC should specify as they did for the customer what documents the owner should retain. (For example: meter data and application for service data). Additionally there should be a section for the retailer and the AESO as they both also hold information that may be required should there be a customer dispute.</u></p> <p>(3) The Commission may request from a customer or an owner the information or documentation required to be</p>	<p>This section is intended to be broad. The owner must retain all information submitted to it by a customer and any information it has on the micro-generation unit and its connection to its system.</p> <p>There is no need to require retailers and the AESO to retain records under Rule024 because such records do not</p>

Section	Existing	Proposed changes	Stakeholder comments	AUC responses
			<p>kept under this section. <u>As per previous comments the retailer and AESO should also be included.</u></p> <p>(4) A customer or an owner shall submit the information or documentation required to be kept under this section in accordance with the Commission's request.</p> <p>Howell Mayhew Engineering: I like this new section 8.</p>	<p>pertain to the construction and operation of the micro-generation unit.</p>

General comments for Form A – Micro-Generation Notice

AUC response: In response to the stakeholder comments received, a revised Form A is included below.

Alberta Environment and Parks

Section 2. Project Description, Section 3. Supporting Documents Required

The energy source and other requirements are outlined as follows:

AUC Rule 24 - Form A

Energy source(s) of the Generator(s): Solar Wind Hydro Biomass Fuel cell Other (please describe)_____

Have you met all applicable environmental requirements? Yes No (Please specify) _____

This information request leaves a proponent to suggest alternatives that simply wouldn't be acceptable under any circumstances. It may be reasonable to provide direction on what those types of generation projects that would not be accepted.

The other point that is with regards to small scale biomass. Conventionally, this means the burning of clean wood wastes although there could be other types. However, this type of activity could be covered by an EPEA approval, does have an air contaminant release that must be managed, and would at a minimum be subject to primary particulate matter emission requirements outlined in the Substance Release Regulation. Other types of "biomass" would also likely need to be assessed.

AUC response: The micro-generation generating unit is to be described in additional documentation provided to the owner. There is a listing of documents that are required for the notice.

ATCO Electric

Section 2. Project Description

ATCO Electric notes that nowhere on the form is the Site ID for the micro-generating unit indicated. This information is required in order for the owner to determine if the distribution system can support the micro-generator, if upgrades are required, and where to install the bi-directional meter.

AUC response: The Site ID is included in the Project Description section of the notice.

EPCOR

Sections: All

Is it possible to number all sections for convenience and ease of navigation?

AUC response: The AUC will revise Form A by numbering each section.

Section 2. Project Description

Can "geothermal" be added as an energy source?

AUC response: The AUC will add "geothermal" as an energy source.

Should Demand (generating unit capacity) in this case be expressed in kW?

AUC response: Demand should be expressed in kVA.

The CSA Standard does not address synchronous-based MGs; therefore customers must refer to Owners' specific technical requirements. An example of an additional question is provided below:

If you have synchronous-based micro-generating unit(s), does it comply with "Owner's technical requirements" in particular requirements regarding "Anti-islanding"?

Yes No

AUC responses: The AUC will include the additional question in Form A.

Is the following question necessary if renewable energy is a necessary condition for a micro-generating unit: Does your generator meet the MG Regulation's "Renewable or Alternative Energy" Definition?

Yes No

AUC responses: The AUC will remove the question from Form A.

Howell Mayhew Engineering

Section 1. Customer Identification

"email" should be "Email"

AUC response: The AUC will change "email" to "Email".

Section 2. Project Description

For PV systems this should require both the AC rating and DC rating because PV systems are known by their DC rating because it is the DC rating that is what generates electrical energy, but the WSP distribution system facility is only affected by their AC rating.

AUC response: The AUC will revise the wording to read as follows: "Micro-generation Generating Unit(s) nameplate AC capacity (kW):".

Demand kVa section. Over what time period...? A year? Who cares about this? This value is not part of the MG Regulation at all.

AUC response: The AUC will revise the wording for Demand (kVA) and Customer annual consumption (kWh) to read as follows:

Estimate a.c. Demand (kVA)

Estimate customer annual energy consumption (kWh)

Owner's Logo

Form A – Micro-Generation Notice

(If you have questions on how to fill in the form, refer to Micro-Generation Notice Submission Guideline posted on the AUC website: www.auc.ab.ca)

Check the appropriate boxes to identify your micro-generation project:

Project meets micro-generation generating unit size requirements (i.e. not to exceed 5 MW)? Yes No

Are you an existing micro-generation customer? Yes , existing capacity: ____ kW; No

Are you planning to increase or decrease the generation capacity? Yes , capacity change (+/-): ____ kW; No

Is this notice being used for aggregating multiple sites? Yes No

1. CUSTOMER IDENTIFICATION			
Name:		Company Name:	
Address:		City:	
Province:	Postal code:	Phone:	Fax:
Email address:		Preferred method of contact: Email <input type="checkbox"/> Mail <input type="checkbox"/> Fax <input type="checkbox"/>	
Consultant name:		Consultant phone #:	
Consultant address/city/province/postal code:			
Other interested parties:			
2. PROJECT DESCRIPTION			
Site Legal Description:		Site ID:	
(If the project involves aggregated sites, list the sites in the following table. Expand the list in separate sheets of paper if required.)			
Legal land description(s):		Site ID(s):	
Site 1.		Site 1.	
Site 2.		Site 2.	
Site 3.		Site 3.	
Site 4.		Site 4.	
Service address(s):		Retailer name(s):	
Site 1.		Site 1.	
Site 2.		Site 2.	
Site 3.		Site 3.	
Site 4.		Site 4.	
Energy source(s) of the Generator(s): Solar <input type="checkbox"/> Wind <input type="checkbox"/> Hydro <input type="checkbox"/> Biomass <input type="checkbox"/> Fuel cell <input type="checkbox"/> Geothermal <input type="checkbox"/> Other <input type="checkbox"/>			
Specify: _____			
(If the project involves aggregated sites and consists of generators using different energy sources, list them out in a separate table.)			
Type(s) of Generator(s) connected to the utility interface: Inverter based <input type="checkbox"/> Induction <input type="checkbox"/> Synchronous <input type="checkbox"/>			
(If the project involves aggregated sites and consists of different types of generators, list them out in a separate table.)			
Micro-generation Generating Unit(s) total nameplate a.c. capacity (kW):	Estimate a.c. Demand (kVA):	Estimate customer annual energy consumption (kWh):	
Site 1:	Site 1:	Site 1:	
Site 2:	Site 2:	Site 2:	
Site 3:	Site 3:	Site 3:	
Site 4:	Site 4:	Site 4:	

Projected total net a.c. annual energy production (kWh) from the micro-generation generating unit(s) :	
Voltage level of connection:	Phase: Single <input type="checkbox"/> Three <input type="checkbox"/>
If you have inverter(s) in your micro-generating unit(s), does it comply with "CSA Standard C22.2 107.1 – Power Conversion Equipment" in particular standards respecting "Anti-islanding"? Yes <input type="checkbox"/> No <input type="checkbox"/> If you have inverter(s), please specify the inverter(s) type(s) used: Line commutated type <input type="checkbox"/> or Self commutated type <input type="checkbox"/> If you have synchronous-based micro-generating unit(s), does it comply with the owner's technical requirements for connecting generators, in particular requirements regarding "Anti-islanding"? Yes <input type="checkbox"/> No <input type="checkbox"/>	
Requested in service date (YYYY-MM-DD) for connection:	
3. SUPPORTING DOCUMENTS REQUIRED:	
Submit the following supporting documentation: a) Electric single-line diagram b) Site Plan c) Electrical Permit d) Electrical Inspection Report (to be submitted after installation of the micro-generator(s) is completed and inspected) e) Other supporting document(s), if any, please specify: _____	
Have you met all applicable municipal and zoning requirements, including noise rules and by-laws? Yes <input type="checkbox"/> No <input type="checkbox"/> Please specify: _____ * Have you completed the participant involvement program stated in AUC Rule 007? Yes <input type="checkbox"/> No <input type="checkbox"/> Please specify: _____ * Have you met the requirements stated in AUC Rule 012? Yes <input type="checkbox"/> No <input type="checkbox"/> Please specify: _____ * Have you met all applicable environmental requirements? Yes <input type="checkbox"/> No <input type="checkbox"/> Please specify: _____ * Are you aware of any outstanding objections from any person regarding your project? Yes <input type="checkbox"/> Please specify: _____ No <input type="checkbox"/>	
Applicant Signature:	Submission date:
4. ELECTRIC DISTRIBUTION SYSTEM OWNER USE ONLY:	
Owner's notice reference #:	AESO asset ID (if any):
Date received:	Interconnection Line:
Accepted: Yes <input type="checkbox"/> No <input type="checkbox"/> Reason(s) for dispute:	
Interconnection agreement signed? Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable <input type="checkbox"/>	
Meter type: Interval <input type="checkbox"/> Cumulative <input type="checkbox"/>	Substation Number:
Meter Installed Date:	
Remarks:	

* Notes: The micro-generation customer must ensure that the criteria for granting an exemption from filing an application with the Commission as stated in Section 2 of this rule are satisfied.

In order to receive electricity generation credits, the micro-generation customer must notify its retailer or regulated rate provider once the notice is accepted by the owner or in the event that the Commission decides that a disputed unit is a micro-generation generating unit

Form B – Notice of Dispute

To be completed by owner when there is a dispute with respect to the customer’s eligibility to become a micro-generator or on the question of extraordinary costs.

Information required must include the following:

Contact person for the dispute notice:	Name:
	Phone:
Is owner represented by another person?	Yes <input type="checkbox"/> No <input type="checkbox"/> If yes, provide name and contact information
Is a copy of the MG project notice (Form A) attached?	Yes <input type="checkbox"/> No <input type="checkbox"/>
Dispute type:	<input type="checkbox"/> Qualification (MG Regulation - Sections 2(2) or 2.1(2)) <input type="checkbox"/> Extraordinary costs (MG Regulation - Sections 4(3) or 4(3.1))
If dispute is related to Section 2(2) or 2.1(2), has owner served notice on customer within 14 days?	Yes <input type="checkbox"/> No <input type="checkbox"/>
Dispute rationale:	
Other information attached:	

Date of submission: _____

Form C – Notice of Complaint

To be completed by micro-generation customer when there is complaint on the metering cost.

Information required must include the following:

Contact person who submits the complaint notice:	Name:
	Phone:
If customer is represented by another party?	Yes <input type="checkbox"/> No <input type="checkbox"/> If yes, provide name and contact information:
Attached a copy of the MG project notice (Form A):	Yes <input type="checkbox"/> No <input type="checkbox"/>
Type of complaint:	<input type="checkbox"/> Interval metering costs (MG Regulation Section 3(5))
Provide full details of the complaint:	
Other Information attached:	

Date of submission: _____