

**July, 2006  
Micro-generation  
Stakeholder Comment Form**

Comments From: Alberta Agriculture, Food and Rural Development  
 Date: August 11, 2006  
 Contact: Karen Haugen-Kozyra, Environmental Policy Member  
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**1. If a Micro-generator (less than 150kW in size and exports less than 25kW to the AIES) wishes to connect to the distribution system, but does not wish to receive payment for exported energy:**

The AESO will not require visibility of the generator, therefore, the DGO will not be required to become a Pool Participant  Support  
 Oppose  
 Indifferent

Reasons for Stakeholder Position:  
 Since this is an interim policy, and appears to offer flexibility to the DGO, we support it during the interim. However, this would not be a preferable long term measure since streamlining interconnection costs, simplifying grid connection, and reducing metering costs is a priority for our clients.

The DGO will submit a Generator Asset Addition form and a SLD, and an Asset ID will be assigned  Support  
 Oppose  
 Indifferent

Reasons for Stakeholder Position:  
 Seems reasonable.

The DGO will *not* receive payment for energy that is exported to the AIES  Support  
 Oppose  
 Indifferent

Reasons for Stakeholder Position:  
 Since there is flexibility in this measure, and it's interim, we will not take a position on this. However, we want to point out that not all microgeneration sources are in the same situation. For example, our clients interested in biodigesters (using manure/organic residues as feedstocks), can run over 90% of the time. At 20 kWh excess electricity production, and an average power pool price at \$0.06 kWh, (and 10% downtime), revenue generated can be in the range of \$5000 - \$6000 annually. For those suppliers, we don't see a benefit from this policy.

Generation metered data (DSM) files will not be provided to the AESO or the LSA  Support  
 Oppose  
 Indifferent

Reasons for Stakeholder Position:  
 Indifferent signifies required clarification or a measure that is unclear. This is confusing to us – if metered generation is not sent in, then how will the DGO reduce the amount of load required from the WSP?

In the event that energy is exported to the AIES, it will not be accounted for by the Pool or the Load Settlement Agent.

Support  
 Oppose  
 Indifferent

Reasons for Stakeholder Position:  
See above....

Metered generation cannot be used to offset the metered load data.

Support  
 Oppose  
 Indifferent

Reasons for Stakeholder Position:  
Again, how can the

The DGO, WSP, and the AESO must be in agreement of this option, and provide an executed letter to the AESO.

Support  
 Oppose  
 Indifferent

Reasons for Stakeholder Position:  
Seems like a reasonable process.

**Option 2. If the DGO wishes to receive payment for energy exported to the AIES, the following will apply: (no changes to the existing rules)**

**AAFRD's response – see the General Comments at the end. The status quo is proving to be a challenge for most agricultural DGOs.**

The DGO must become a Pool Participant and follow all ISO Rules accordingly.

Support  
 Oppose  
 Indifferent

Reasons for Stakeholder Position:

Interval Metering is required, per 4.6.1(b) of the SSC.

Support  
 Oppose  
 Indifferent

Reasons for Stakeholder Position:

If a DG meets the requirements per 4.6.1(b)1, it is exempt from having an interval meter.

Support  
 Oppose  
 Indifferent

Reasons for Stakeholder Position:

Data must be provided to the AESO and the LSA in accordance with App. B, Section 3 of the SSC for every 15 minute interval during the month, in the DSM format described in B.6.2.4.2 of the SSC.

Support  
 Oppose  
 Indifferent

Reasons for Stakeholder Position:

In the case of a cumulative meter, the data from the monthly meter read must be distributed across every 15 minute interval during the month.

- Support  
 Oppose  
 Indifferent

Reasons for Stakeholder Position:

**General Comments:**

We're pleased that the AESO has offered an interim strategy to accommodate microgeneration sources, while Energy is formulating their microgeneration policy.

But we see this interim measure offering little financial benefit for agricultural DGOs, particularly with more consistent sources of electricity such as those from on-farm or rural biodigesters. The cost and time spent dealing with the WSP still remains for those wanting to sell excess electricity. It is unclear to us how the DGO, having opted out of payment, will reduce the amount of load required by the WSP. This will need to be clarified.

However, the interim measure offers a flexible approach for DGOs to opt in or out of the power pool, waive the \$150 per year fee and have lower visibility (which many small wind and PV operators may do already, satisfying their own electricity needs). It does not address the constraints currently facing several proponents of agricultural DGO sources, such as cost of interconnection, complexity of interconnection and ancillary metering costs.

**Please return this form with your comments by August 11th, 2006, to:**

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