



Solartility Inc.

Micro-generation Dispute Regarding Bi-Directional Interval Meters for Solartility Customers

June 2, 2022

Alberta Utilities Commission

Decision 27161-D01-2022

Solartility Inc.

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Bi-Directional Interval Meters

for Solartility Customers

Applications 27161-A001 and 27161-A002

Proceeding 27161

June 2, 2022

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1 Decision summary

1. In this decision, the Alberta Utilities Commission decides whether Mr. Shayne Butcher and Mr. James Koch, micro-generation (MG) customers of Solartility Inc., should receive bi-directional interval meters from ENMAX Power Corporation (EPC) at no cost to themselves.
2. For the reasons that follow, the Commission denies Solartility's request that interval meters be provided to its two customers free of charge.

2 Application background and legislative framework

3. Under the *Micro-generation Regulation*, a customer who wishes to become an MG customer must provide notice to the owner of the electric distribution system (the Owner) in whose service area the customer is located, including all information required under Rule 024: *Rules Respecting Micro-Generation*.¹ Unless the Owner is of the opinion that the customer's generating unit will not qualify as an MG unit, it must accept the MG notice.²
4. When an Owner receives an MG notice, it must ensure that suitable meters are installed at the customer's MG site.³ In the case of small MG, the Owner is required to supply and install a bi-directional cumulative meter.⁴
5. However, small MG customers may ask the Owner to supply and install a bi-directional interval meter, a request which the Owner can either accept without charge to the customer, or decline.⁵ If the Owner declines the request for an interval meter, the customers have the option of paying for this meter themselves or applying to the Commission for an order requiring the Owner to supply and install an interval meter without charge to the customer, in which case the Commission may investigate and decide the matter as it considers just.⁶
6. Solartility's customers provided MG notices to EPC and requested that bi-directional interval meters be supplied and installed without charge. EPC accepted the MG notices outside the required 14-day period under Rule 024, but declined the request to supply and install interval meters.

¹ *Micro-generation Regulation*, Section 2(1).

² *Micro-generation Regulation*, Section 2(2).

³ *Micro-generation Regulation*, Section 3(1).

⁴ *Micro-generation Regulation*, subsection 3(2)(a).

⁵ *Micro-generation Regulation*, Section 3(3).

⁶ *Micro-generation Regulation*, Section 3(5).

7. Solartility, on behalf of Mr. Shayne Butcher and Mr. James Koch, applied to the Commission for an order that EPC:⁷

- (a) Install interval meters free of charge;⁸ and
- (b) Maintain the customers' existing residential distribution tariff rate class of D100 following the installation of the requested interval meters.

8. The Commission issued a notice of application and received statements of intent to participate from EPC and Howell Mayhew Engineering Inc. The Commission granted EPC standing to participate but denied standing to Howell Mayhew. The Commission considers that the record for this proceeding closed on May 6, 2022.

9. The Commission reviewed the entire record in coming to this decision; lack of reference to a matter addressed in evidence or argument does not mean that it was not considered.

3 Issues

3.1 Should Solartility's customers receive interval meters without charge

10. EPC justified its denial of Solartility's request to provide interval meters to its customers without charge on the basis that interval meters are not required for small MG customers. It stated that if it supplies and installs an interval meter at no charge to small residential MG customers, that cost will be borne by all of EPC's residential customers while any financial benefit from having an optional interval meter will accrue to Solartility's customers alone. EPC indicated that the costs associated with supplying and installing an interval meter total \$2700, compared to \$400 for a cumulative meter.

11. EPC also explained that none of its residential MG customers currently use interval meters, and its load settlement and billing systems are not configured to process interval data from residential sites. EPC estimated that the required system upgrades would cost approximately \$75,000 and take approximately six weeks to implement.

12. In contrast, Solartility submitted that providing interval meters to each of its customers at EPC's cost is consistent with the purpose of the *Electric Utilities Act* and expressly contemplated in the *Micro-generation Regulation* and Rule 024. Solartility explained that its retail services require the use of an interval meter, which can increase efficiencies by allowing residential customers to participate in the hourly market and gain a better understanding of their electricity usage. It disputed the cost estimate of interval meter installation provided by EPC, questioning what costs beyond

⁷ This paragraph represents Solartility's ultimate requests for relief. On February 11, 2022, when the application was originally submitted, Mr. Butcher was the sole customer represented. At that time, EPC had not yet accepted or denied Mr. Butcher's MG notice, and Solartility's application included a request that the Commission order EPC to accept the MG notice. On February 24, 2022, EPC accepted Mr. Butcher's MG notice while declining his request for an interval meter, and Solartility retracted its aforementioned request. On March 25, 2022, Solartility filed a second MG dispute on behalf of its customer, Mr. James Koch. Noting that the application was substantially similar to Mr. Butcher's, the Commission decided to consider both applications in a single proceeding.

⁸ Note that, originally, Solartility did not include in its requested relief that the interval meters be provided free of charge to its MG customers. This request surfaced later in the proceeding.

the meter itself are included. Solartility considers that requiring payment for interval meters to be unduly discriminatory and contrary to Section 105 of the *Electric Utilities Act*, because it prevents MG customers from exercising their right to choose their retailer and retail services and treats them differently from other residential customers by requiring them to pay additional costs.

13. The Commission does not consider it to be just or in the public interest to order EPC to supply interval meters to Solartility's customers at no charge. While the Commission acknowledges that an interval meter may provide certain economic and other benefits such as energy efficiencies and reduced carbon emissions, these benefits will primarily be realized by Solartility's customers at a cost that will be borne by all of EPC's residential customers. The Commission does not consider this to be a just result.

14. The Commission is also not persuaded by Solartility's argument that requiring small MG customers to pay for interval meters is unduly discriminatory or contrary to the purposes of the *Electric Utilities Act*. While the service that Solartility's customers have chosen requires an interval meter, interval meters are not required for the purposes of small MG; those customers who want one have the option of paying the cost themselves. This is expressly contemplated under Section 3 of the *Micro-generation Regulation* and does not inhibit a customer's choice of retailer or retail services.

15. Should Solartility's customers agree to pay EPC's reasonable costs of supplying and installing an interval meter, EPC has indicated that it will proceed with the installation, as required under the *Micro-generation Regulation*. The Commission will leave the issue of determining the reasonable costs of installation of an interval meter to the parties.

3.2 Changes to customer rate classes

16. Solartility requested that the Commission order EPC to maintain its customers' existing residential distribution tariff rate class of D100 following the installation of the requested interval meters. During this proceeding, EPC clarified that previous discussions around this issue were intended to explore ways of accommodating interval meters within the limitations of EPC's existing system. EPC stated that it does not intend to unilaterally change the rate class of Solartility's customers, acknowledging that the *Micro-generation Regulation* does not permit it to do so. Given this acknowledgement and because Solartility's request for an order requiring EPC to install bi-directional interval meters at EPC's cost is denied, the Commission does not consider it necessary to make findings on this point.

3.3 EPC's processing of micro-generation applications

17. Under Rule 024, a utility has 14 days from receipt of a MG application to accept or decline it. Both customers' applications were outstanding in excess of this 14-day deadline. EPC explained that it has been regularly missing this deadline due to significant increases in the volume of MG applications received and time spent providing assistance and education to customers regarding the MG requirements and notice process.⁹ The Commission considers EPC's justification for its delayed response time to be reasonable and it will not be pursuing

⁹ Exhibit 27161-X0008.

further action at this time. EPC should keep the Commission informed of any changes to its processing of MG applications, particularly if timelines do not improve.

4 Order

18. Solartility's request for an order requiring EPC to install bi-directional interval meters at EPC's cost is denied. Should Mr. Shayne Butcher or Mr. James Koch agree to pay the reasonable costs of supplying and installing an interval meter, EPC must proceed with the installation and change the designation of the customer(s) to large MG.

Dated on June 2, 2022.

Alberta Utilities Commission

(original signed by)

Neil Jamieson
Commission Member