AUC Rule 007: *Applications for Power Plants, Substations, Transmission Lines, Industrial System Designations, Hydro Developments and Gas Utility Pipelines*

Summary of public consultations

Meeting date	Various dates between May and July, 2024		
Format and Location	Virtually and in-person at 1400 - 600 Third Avenue S.W. Calgary	**Facilitator**	AUC staff

The following are high-level, summary notes observed from a series of consultation sessions held between May and July, 2024. These notes are not attributable to any specific participant and have been generalized by AUC staff. Not every comment has been reflected in these notes. The notes in Section 2, "What we heard", reflect participants' key discussion points and do not reflect the views of the AUC or AUC staff.

1 Introductions

- AUC facilitators welcome the room, conduct land acknowledgment, introduce consultations.
- AUC reviews its rules periodically for a number of reasons. This review is driven by a few factors and has many topics under consideration.
- Over the last few years we have had technology and market changes driving the need for change, represented in topics such as energy storage facilities, review of time extension and approval transfer requirements.
- The AUC ran its inquiry into the ongoing economic, orderly and efficient development of electricity generation in Alberta in 2023 and 2024, and as part of that we committed to some changes in Rule 007 and were further directed by Minister Neudorf to consider certain items. With respect to those items, the AUC is not responsible for *making* policy decisions. Instead, Rule 007 is designed to clearly set out the information requirements that the AUC needs to make its decisions in accordance with current policy, among other considerations.
- The views that you share will be assessed by the Commission, along with any other feedback we might receive in writing and will result in draft changes to Rule 007. Those draft changes will be issued in a blackline version of the rule, likely later in fall of 2024, and you will have further opportunity to review and provide comments in writing.
- The Commission will further consider the written comments we receive on the blackline version and then will issue a final version of Rule 007.

2 What we heard

<u>Time extension requirements</u>

Should the Commission consider adopting standard construction periods for power plants that it would apply to new power plants going forward?

- See Section 5(d) of the *Electric Utilities Act* (flexible framework so that need for and investment in generation are guided by competitive market forces). Projects are governed by market forces and are not subject to consistent lead times. It would be best for market participants to decide on timing for their own projects.
- There are too many unknowns at the time that approval is granted. Final engineering on a project is not yet usually completed, equipment lead times are unknown. Delays will come up and time extensions will be required.
- Construction should not be rushed, particularly when environmental impacts are still being discussed post-pause on approvals.
- There should be standard construction periods but no rushing of project approvals.
- Longer periods of time to construct may allow for greater respect of archives (the land), history, medicines, waters.
- Standard construction periods seem like an arbitrary regulatory burden.
- There should not be a max number of time extensions, but they should be progressively more difficult to obtain as time goes on.
- A longer length to construct with one possibility for extension could be an improvement over numerous extensions.
- Construction is destructive to farming and uncertainty is not good for process. Construction should start within a year of approval and there should be a limited number of extensions. Repeated extensions/on and off activity is the most disruptive to farming practices.
- Without coordination with the AESO, it does not make sense for the AUC to implement this.
- AUC should not impose any restriction that the AER does not.

What would be a reasonable initial period to construct?

- Very difficult to establish this. There is a high level of variability in projects.
- Could consider in-service date of cluster studies so AUC and AESO could coordinate approvals.
- Any timeline would have to be based on qualifying factors such as procurement.
- It would be reasonable to establish a very generous sunset clause using existing time extension process.
- It may be inefficient for an applicant to file a new application if the bulk of the AUC's review process has been completed and the proponent runs out of time to construct.
- After five years a proponent should have to re-apply if construction hasn't started.
- No less than three years and up to four years was suggested.
- Ten years was also suggested as an appropriate length of time.

Should the amount of construction completion time differ for different types of power plants?

- Yes.

Recognizing the variability in projects, what reasons should be considered acceptable for a time extension to be approved?

Lead times, delivery times, credit issues, investment decisions, general market announcements (e.g. market redesign, *Transmission Regulation* updates).

- It is difficult to create a list of acceptable reasons, but the AUC could consider proponents demonstrating continued progress and investment into project (e.g. ordering equipment, hiring EPC firm).
- Beyond the requirement to ensure that surveys are up to date, there should not be any onerous scrutiny on justifications for time extensions.

Approval transfers

What criteria should the Commission consider when assessing approval transfers, including information to ensure the new operator will have sufficient funds available at the project's end of life?

- Requirements should flow with the project. New owners should meet conditions of initial approval.
- The same requirements should apply to corporate re-organizations.
- There needs to be assurance that the corporation taking over is financially stable/viable and that finances are in place for end of life.
- There needs to be security upfront so that we do not end up with orphaned infrastructure.
- Reclamation requirements need to be robust and standard across all companies.
- Reclamation cost is part of the transfer. Part of a reapproval should require reassessed values from a recognized company.
- Reclamation should be established at the outset and managed using compliance and enforcement, not through the approval transfer process.
- Additional regulatory burden is created when projects are scrutinized during transfers.
- Introducing new requirements/tests for transferee may introduce regulatory uncertainty.
- Approval transfers need to have quick turnaround. We want to avoid delay leading to regulatory uncertainty for investors. Timelines are critical.
- If the approval transfer process becomes overly onerous, proponents will avoid it and will have more share purchase agreements than asset purchases/transfers.
- Don't want to see notice of applications for approval transfers. The requirements should be clearly set out so the AUC can come to an easy determination on the transfer.
- AUC practically does not have jurisdiction to monitor change/control of corporation.
- AUC should ensure that power producing assets are controlled by Canadian parties and transfers to foreign entities should not be approved.
- There should not be any approval transfer requirement that does not already apply to oil and gas operators.

What are the implications of approval transfer applications being subject to the regulatory regime in place at the time of the application for a transfer?

- Security in place should move with the project to facilitate transfer approvals.
- Existing regulatory requirements should be grandfathered.

Agricultural land

- AUC needs to consider soil impacts up and down wind in all directions for large distance, given turbulence goes a long distance.

- Requiring information prior to application is reasonable. The depth and amount of survey required based on land base should be determined by a qualified expert.

What are the impacts of a requirement for earlier soil field verification on Class 1 or 2 agricultural lands?

- Professional discretion should be relied on when determining the intensity of soil inspections and parties should rely on existing soil inspection standards.

- There is value to first-hand knowledge of the soil. There may also be higher value in inspections versus reliance on the LSRS in cases where an assessment should consider out-of-standard assessments (i.e. suitability for land for specialty crops such as hemp).

- There may be best uses of land as defined by the landowner that may not align with other parties' definitions. There is intersection with landowner rights.

- Note that lab testing costs $50 to $150 per sample.

- There is not a lot of value in obtaining soil field verification earlier in the process. It will ultimately have to be re-done, adding duplication and added expense.

Land suitability rating system (LSRS)

- AUC should consider the previous use of farmland (i.e. if it was heavily farmed for previous decades maybe it should get a break).

LSRS is easy to use if you have some GPS skills but it can be very out of date regarding its classifications (i.e. whether irrigation is available).

- It has limitations but is a good starting point.

- Classes 1 and 2 may not take into account new agricultural processes (e.g. hemp can grow better on Class 4).

- With modern farming/agronomics, classes 3 and 4 can perform like classes 1 and 2.

- Just because land has productive capacity doesn't mean it's actually being used for production.

- AUC should be less prescriptive about soil type and dive deeper into specifics of that land for a given project.
- Scale of LSRS may not be appropriate for the application. Polygons are very large and may miss relevant field specifics.
- LSRS is more refined than Canada Land Inventory (CLI).
- LSRS should be thought of as a desktop assessment model and has significant limitations.
- Farmland assessment rating is a great method for further analysis. Provides opportunity to pre-zone or have zoning in place, which reduces the need to go out and do farm studies every time.

Comment on the interim requirements listed in AUC Bulletin 2023-05

- Using AGRASID, describe the agricultural capability of soils intersecting the project footprint as provided in the seeded small grains attribute of the LSRS table, and provide a table showing the area of each LSRS class impacted by the project.
- This is a critical requirement.
- There is concern about AUC's stance imposing more requirements for applications.
- The AUC should note exceptions rather than having blanket requirements within Rule 007.
- AGRASID/LSRS is a first step. There are issues with every database in terms of accuracy.
- There is redundancy with what is already discussed in environmental protection plan/environmental evaluation and environmental farm plan.
- LSRS only shows soil quality on larger scale and there should be carveouts for site specific deviations on a larger scale.
- It's inaccurate to say that a project can coexist with agriculture. Primary prevention is very important.
- From AGRASID, describe all soil series within the project area and report potential impacts to soil quality, quantity and hydrology. Describe how these impacts will be mitigated during construction, operation and reclamation.
- This isn't a suitable approach for lands with clay and overland flooding.
- It's a step in the right direction to provide this information ahead of approval.
- How much cement is needed to give stability to keep wind turbines in place?

- Describe all earthworks planned for the project, including details on anchor structures, and stripping and grading of soils.
- This is a reasonable requirement.
- This is already required in EPP requirement and is redundant.
- Caution against adding burden to smaller projects which have smaller impacts. If requiring the same requirements for small projects, extra overhead will make small projects less viable. There should be alignment between impact of projects and requirements.
- Footings should also take into consideration concrete/steel piles, how they affect the water table/aquifers, long term effects. This is lacking in AUC requirements.
- Water quality should be tested before turbines are reclaimed. All cement needs to be removed during reclamation.
- AUC needs to understand impacts of bigger pile driving/bigger vibrational impacts, needs to be more than just a simulation.
- The specific wording of “description of how soils will be replaced on site” should be rephrased to “redistributed on site.” Replaced is confusing in the context and suggests new soil being brought in.
- Describe the potential for co-locating agricultural activities into the project design.
- This should be given significant weight.
- Agrivoltaics should always pursued. Every project should have an agrivoltaics plan, not just those on classes 1 and 2.
- Why apply to classes 3 and higher? If poor quality soil with no ag presence, why ask or require for co-location?
- It would be helpful for the AUC to provide a list of specific activities that would qualify.
- AUC needs to consider agrivoltaics in a very broad manner, e.g. regeneration of native grasslands, bee friendly, rather than specifying the type of crop acceptable.
- AUC needs to consider how to ensure compliance and how proponents are following up.
- There should be tools to assist landowners if intervention is necessary.
- There should not be blanket restrictions particularly for smaller projects.

- There is a need for a discussion around equivalency to agricultural productivity.
- Asking this information without a requirement in place is of limited use.
- List the qualifications of the agroglogist(s) who prepared or reviewed the responses regarding agricultural land.
- These qualifications are very important and there should be need to demonstrate that the individual has experience designing farm plans.
- There is a bias from corporate agrologists so AUC needs to do an impartial review.
- Determinations about whether animals should graze, what kind, where etc. should be made with landowners and not third party agrologists.

<u>Land use</u>

- Municipalities reply on Municipal Development Plan and land use zoning bylaw, in addition to publicly vetting for different development types in their jurisdictions.
- It's complex as AUC asks for compliance with municipal planning frameworks in referral letter at a stage where the municipality may not have vetted that information yet.
- Many municipalities have not yet drafted land use zoning districts for renewable energy developments.
- Recognizing changing land use from agricultural to industrial is an important Rule 007 consideration.
- Project proponents often ask for a waiver/variance to land use compliance requirements of a municipality.
- Stormwater management plans and weed management plans should be deferred to municipality rather than AUC for decision.

<u>Appropriate setbacks from residences and other important infrastructure</u>

- Wind projects should be further from residences.
- There needs to be standardized setbacks for wind and solar projects.
- Consider data that points to impacts to humans and wildlife from infrasonic sound.
- Research shows minimum setbacks of 5 km from turbines, but it should be 15 km to be safe.
- Height matters for proximity to aerodrome operations.
- Proximity is intrinsically bad when it comes to communities.

- BESS attached to solar projects should have wildlife setback requirements. This is not necessary for standalone BESS projects.
- Transport Canada should be involved early in the process to make sure safety is dealt with for turbines taller than 500 feet.
- Be cautious against creating a regulatory environment that is biased against certain forms of energy production.
- Imposing setbacks only on renewable energy facilities would be a structural change to the market and not acceptable (contrary to section 5 of the *Electric Utilities Act*).
- To impose general setbacks, AUC would have to accept that proximity by itself is inherently bad. Rule 012: *Noise Control* is a good example of a setback tied to a measurable, quantitative impact. Glare studies do something similar.
- Note that generally these third-party noise/glare assessments are conservative and relying on them will result in excessively large setbacks.
- Impacts need to be quantified and measured on case-by-case basis if considering setbacks.
- Setbacks aren't perfect but will provide a reasonable guarantee/safe limit. The AER has longstanding distances established.
- Look to UK government for its approach on setbacks.
- A number of setbacks are already regulated by other regulators (residences, county bylaws). AUC should not duplicate efforts.
- It would be complementary for AUC to consider setbacks given the number of municipalities currently reviewing its setback distances in land use bylaws for wind/solar.

<u>Reclamation security</u>

- Interim requirements are generally workable but would benefit from standardization/streamlining.
    - For reference/comparison, for reclamation security, CER provides similar guidance docs for abandonment cost estimates, to provide certainty/standardization across spectrum.

Amount

- Consider developing template for abandonment cost estimates, including standardization of economic assumptions.
- Regarding third party report, AUC could provide a series of assumptions that would be reasonable to use, including what specific details are needed or what AUC is willing to accept as a commitment to be filed once engineering is complete.

Timing

- Is AUC willing to consider power projects that have a repowering clause? Initial term of 20-25 years, with new term to be renewed. Any cash backing the security could be repurposed for the site and a new amount securitized for the project.
- How will estimates for 25 years out be accurate?

- First cost estimate should not be required until year 5. In the first years the equipment is brand new. The cost to take out is less than what the equipment is worth.
- Security should be in place reasonably close to the time security will be used (consider the term of the lease)
- When a cost estimate is provided to the AUC, the reporting period should start prior to cash on delivery or shortly thereafter.

Form

- Any form of security should survive bankruptcy. Parental guarantees and bonding don't (orphan well fund)
- The ideal form is administering as a trust. It will survive bankruptcy, administered by a third party, can be designed flexibly.
- Other options – irrevocable letter of credit, surety bond
- Irrevocable letters of credit can be revoked, the burden is then borne by municipalities and Albertans.
- Consider things at the fringes such as tax treatment that is available in the event of a trust. The returns earned with a trust are taxed at a high level relative to corporate earnings, so will raise the cost of administering the program.
- Consider bonding model/bonded reciprocal model and using group insurance.
    - Another form of security is self-insurance. This doesn't work well in the case of insolvency.
    - Consider accommodations of escrow account or cash, cashback to LC drawn from one of the main chartered bcanks. It would survive bankruptcy.
    - Consider whether project land is owned or leased.
    - Consider corporate programs versus project-by-project base. AER's structure looks at corporate basis.
    - Beneficiaries should be landowners.
    - Having said that, landowners would rather have confidence that someone will come and clean up rather than receiving a large sum of money in the end
    - Money needs to be easily accessible for municipalities in the event of bankruptcy.
    - Corporate programs should be prioritized.
    - Good example: AER structure of liability program, which is done on corporate program basis, vs AUC which is standalone basis.
    - Would be helpful if AUC provided what assumptions would be reasonable for experts to take. Many projects are still early stage with more detailed engineering requirements not yet figured out. Many assumptions go into estimate at this stage.

- There needs to be transparency that security requirements have been met and are in place.

- Energy storage facilities
  - Setbacks should match what wind and solar facilities need to apply. Energy storage comes with the same risks as wind and solar projects.
  - For different battery types, all have risks when it comes to thermal runaway.
  - Setbacks should not change with the size of an energy storage facility if the likelihood and size of emissions release is similar.
  - Setbacks should be based on math and science and air dispersion models are a good tool to use for any fire's impact on homes/environment.
  - AUC should publish an information packet for stakeholders, homeowners, people not in industry, regarding assumptions about risks, misinformation and what batteries are bringing to community.
  - Site-specific emergency response plan (ERP) should detail the risks related to the battery storage system that is being applied.
  - ERPs should be accepted in draft form, understanding that changes will be made, and many things cannot be finalized until later stages. Best practices will allow plan to be better updated closer to construction.
  - Setbacks can act as a proxy for air dispersion modeling.
  - Setback distances as a proxy for air quality dispersion modeling shouldn't be used as a minimum setback. Not sure of usefulness, accuracy and appropriateness of just using distance on its own.
  - Setbacks shouldn't change with size of BESS facility. The number of batteries, emissions release likelihood, are all same regardless of number of batteries (Likelihood of more than one unit catching fire is very small as fire doesn't spread between batteries).
  - Basic setback in place wouldn't be starting from scratch – there is global evidence e.g. California that requires 5 km.
  - Not safe setback unless fire station on site – acceptable argument, not always science, always based on human negligence, human errors, catastrophic events can't be predicted, setbacks are good step in prevention for bare minimum, power stations shouldn't be located right next to communities, even CP recommended having an on-site fire station.
  - This would require AUC to accept as axiomatic that proximity in and of itself is a bad thing. A measurable adverse impact has to be attached to proximity. If not, a setback based solely on distance is arbitrary at this point. Considerations should include cooling, chemistry, certification status/tests results for certification under UL 9540 and UL9540A (international safety standards for energy storage facilities). One looks at testing a cell's capability

to engage in a thermal runaway and other looks at the ability to propagate that ability from cell to cell.

- Minimum setback distance serves to arbitrarily disqualify large number of potential host sites for no reason other than arbitrary setback.
- Critical factor: identify setbacks for measurable thresholds, e.g. Rule 012 is great example, implementing single distance setback not good.
- Doesn't serve as proxy for minimum distance but can serve as reasonable proxy for showing there are no impacts at other distances.
- Should base things off math/science/consultation/feedback, not arbitrary.
- Checklists – we will reach a point when a checklist application will make sense for storage facilities of certain scales and chemistry but it doesn't make sense yet.
- Checklists have worked for other facilities and should work here. AUC should take a stab at publishing a sample checklist form.
- Checklists for facilities under 10MW. For energy storage there needs to be consideration of duration. That will dictate the facility size itself.
- Unclear whether Wildlife Directive applies to energy storage facilities.
- AUC should give consideration to types of resource applicable for storage facilities as each resource has own risks.

<u>Interim requirements</u>

- Emphasis on agricultural-first approach. Municipalities should have a more significant role, they know the area and emergency response plans.
- Reclamation security – what happens if a project burns down? How does this impact reclamation?
- Industry thinks current process can be equally applied to energy storage. Municipalities should be consulted.
- *Electric Utilities Act* 5(c) - no unfair advantage so wants to ensure consistent treatment across technologies.
- The current interim requirements for power plants can be equally applied for energy storage projects.

<u>Feedback on topics not identified for Rule 007 review</u>

- PIP requirements aren't working as well as they should.
  - It's difficult to contact stakeholders within the prescribed zones. Registry office is often 6 months out of date. When people move into community during consultation, they may not get timely consultation packages. Can we do a refresh on public consultation requirements of R7?
  - Most/all forms of power plant applications have an amendment process. The only one missing one is hydroelectric powerplants and developments. That

may be a useful addition just to streamline and make consistent with other power plant types.

- No opportunity for pre-application audit the way the AER does. Many companies lie that they've attempted to contact adjacent landowners.

3 Registered parties

Name	Organization
Alice Zhang	ABO Energy Canada
Jodi Kohls	ABO Energy Canada
Noeline Kanagalingam	ABO Energy Canada
Shane Patterson	AEPA
Lorinda Turner	Alberta Land Agent Licensee No. 4521
Gabriella Kovacs	Algonquin Power
Rob Nadonly	Algonquin Power
Sean Fairfield	Algonquin Power
Colin Harvey	AltaLink
Dave Lee	AltaLink
Kristina Groves	Arcadis
Stephanie Wanvig	Arcadis
Jennifer Traichel	ASCENT Energy Partners Ltd.
Robert Henry	ASCENT Energy Partners Ltd.
Arshan Hussaini	ASCENT Energy Partners Ltd.
Kirsten Reich	ATCO Electric
Stephanie Hannem	ATCO Energy Systems
Jennifer Rumas	ATCO ENPower
Anthony Palaschuk	Aura Power
Julio Rodriguez	Ausenco
Dustin Thacker	Beaver First Nation
Allan Kettles	Benign Energy Canada
Jordan Prestie	Blake, Cassels & Graydon
Tara Jones	Bluearth Renewables
Athena Adams	BlueStar Engineering
Joshua Nelson	BRITT RADIUS
Chris Boulton	Capstone Infrastructure
Andrea Kausel	Capstone Infrastructure
Cory DeFraine	City of Calgary
Charlene Beckie	Clem Geo-Energy Corp
Samuel McCallum	Clen Geo-Energy
Geoff Tiffin	County of Newell

Tye Balon	CVE Solar
Derek Macdonald	Demac Energy Consultants Inc
Ed de Palezieux	DePal Consulting
Dan Carrocci	Determination Drilling
John Olsen	EDF Renewables
Mark Gallagher	EDF Renewables
Susan Jin	EDF Renewables
Dan Eaton	Elemental Energy
Duncan Clarkson	Elemental Energy
Liam Wolfe	Elemental Energy
Natalia Fioretti	Elemental Energy
Anne Turbide	EMS Guardian
Paul Luukkonen	Enbridge
Robert Tremblay	Energy Storage Canada
Taylor Smith	Enfinite
Mike Schoenenberger	Enfinite
Wesley Manfro	ENMAX
Andrew Harder	ENMAX Power
Leigh Ann Ward	Enoch Cree Nation
Lyle Morin	Enoch Cree Nation
Lisa Lemish	EPCOR
Carol Wildcat	Ermineskin
Anthony Dawber	Evolve Surface
Dalila Caparroz	Federation Engineering
Darren Calliou	Fishing Lake Metis Settlement
Velma Whittington	Fort McMurray #468 First Nation
Kim Cartwright	FortisAlberta
Kathryn Paterson	FortisAlberta
Sascha Dsouza	FortisAlberta
Jecielle Alonso	FortisAlberta
Genevieve Robose	GoA, Affordability and Utilities
Marc Baxter	GoA, Affordability and Utilities
Alex Van Horne	Green Cat Renewables Canada
Jaimie Slana	Green Cat Renewables Canada
Tyler Reid	Green Cat Renewables Canada
Shanelle Sinclair	Heartland Generation
Ian Bonsma	HGC Engineering
Christine Lambert	Horizen New Energy
Jeanette Leboldus	Horizon Compliance
Melody Garner-Skiba	Intensive Livestock Working Group
Clara Poon	Keyera

Derek Masters	KPMG
Aaron Davidson	Land Solutions
Erika Goddard	Lionstooth Energy
Shaleigh Raine	Louis Bull Tribe
Jenette Yearsley	Maskwa Environmental Consulting
Riley Thackray	McCarthy Tetrault
Derrick Kriszan	MD Willow Creek
Jocelyn Rabbit	Montana First Nation
Kyra Northwest	Montana First Nation
Brian Peers	Municipal District of Taber
Karen Sundquist	Natural Resource Management Branch, GoA
Trevor Wallace	Natural Resource Management Branch, GoA
Virginia Nelson	Natural Resource Management Branch, GoA
Deanne Madsen	Natural Resource Management Branch, GoA
Tyler Kueber	Natural Resource Management Branch, GoA
Pablo Argenal	Nican Consultants
Alan Harvie	Norton Rose Fulbright
Maxwell Kelly	Oldman River Regional Services Commission
Diane Hovarth	Oldman River Regional Services Commission
Claude Mindorff	PACE Pathfinder Clean Energy
Mandy Lunn	Pathfinder Energy
Paul Pepin	Pathfinder Energy
Susan Jin	Permitting and Enviro Specialist
Juliana Barboza Vinha	Pesca Env
Marina Sutilli	Pesca Env
Eric Yee	PGSC
Jennifer Tuck	Potentia Renewables
Marissa Schippanoski	Procido LLP
Keith Hirsche	RenuWell Energy
Leslie Coe	Res Group
Marika Gibson	Res Group
Paul McLauchlin	RMA
Warren Noga	RMA
Harold Gold	RockPoint Gas Storage
Jacky Susilo	RockPoint Gas Storage
Matthew Chilakos	Rocky View County
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David Vonesch	SkyFire Energy
Debbie Kovacs	SLR Consulting
Resha Ali	SLR Consulting
Adrienne McGarrigle	Solas Energy

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Tyler McNab	Sturgeon County
Kaylyn Echlin	Suncor
Robert Mills	Tallcree Lands
Joanne Tatham	TC Energy
Dan Visser	TIU Canada
Doug Lefsrud	Town of Viking
Vincent Light	TransAlta
Akira Yamamoto	TransAlta
David Caplan	TransAlta Corporation
Richard Lavoie	Village of Lougheed
Evan Wilson	VP Policy
Nicholas Newton	Westbridge Renewable Energy Corp
Mark Mallett	Wind Concerns
Grace Winnicki	WRED
Andrew Faszer	WSP
Claire McFee	WSP
David Brown	WSP
Deo Heeraman	WSP
Trevor Cuthbert	WSP
Cory Armfelt	Yellowhead County
Amy Marcotte	
Austin Sevalrud	
Dorine Dentinger	
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