

Public Consultation Submission
**Rule 007: Applications for Power Plants, Substations, Transmission Lines, Industrial
Systems Designations, Hydro Developments, and Gas Utility Pipelines**

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Bulletin 2024-08 Topics

Rule 007 Interim Information Requirements

Agricultural Land

Requirement #1: The standardized use of AGRASID for Land Suitability Ratings for spring-seeded small grains is a positive step towards having all applicants provide consistent information for the Commission's consideration. Provision of a table showing the amount of area for each LSRS class impacted is essential as quantifying the area gives a more transparent representation of how much of each type of land is at stake.

Requirement #2: Describing the soil series within the project area and potential impacts to soil quality, soil quantity, and hydrology is another positive step towards the Commission receiving consistent and reliable information to evaluate. Detailed mitigation strategies for each stage, from construction to operation to decommissioning & reclamation, should be proposed prior to project approval to create a standard that shows applicants have taken these factors into consideration and do not just plan to attend to it post-approval, prior to construction, maybe even at the last minute depending on who is selected as the Engineering, Procurement and Construction (EPC) contractor.

Requirement #3: Asking proponents to outline all planned earthworks serves to extract more valuable information from project developers at the application stage. Requiring applicants to share this information provides some assurance that this part of their project has been well-evaluated, well-designed, and shows potential for being successfully implemented and executed.

Requirement #4: The potential for co-location of agrivoltaic activities into a project's design is critical when a project selects highly-valued agricultural land on which to site themselves. If the co-location is not seen as feasible, it is very reasonable to expect a fully-developed explanation at the point the developer submits their application, and not during rounds of information requests or possibly as part of a hearing. The more information that can be provided as part of the application, the better.

Requirement #5: Mandating the use of a qualified agrologist to prepare or review responses regarding agricultural land is consistent with using other qualified experts in other areas and a very necessary addition to a project's development team.

Municipal Land Use

Requirement #1: Confirming compliance with applicable municipal planning documents seems like an intelligent, no-nonsense approach to validating a renewable energy project, that should save time and money for all parties involved.

Requirement #2: Identification of instances of non-compliance and justification for any non-compliance seems absolutely critical to ensure that developers are being held accountable for their siting choices and conscious decisions to breach established municipal plans and/or bylaws. Many project proponents have previously relied on the rule of paramountcy and sidestepped this very key component of project development.

Requirement #3: Asking applicants to share details on municipal engagement and the potential for implementing proposed modifications or mitigations for potential impacts, is fundamental to showing how municipal consultation began, how it progressed, how it currently stands, and what potential it has for future positive interactions between the parties should a given project be approved.

Viewscapes

This section could be further refined in one area, similar to Requirement #3 above. Applicants should be required to describe how they engaged with all potentially-affected stakeholders (including municipalities), to modify their project plans, or to mitigate and minimize the visual impacts for their project. This issue is one that has been raised by interveners in every hearing and it will continue to be raised so setting a standard to review consultation on this specific topic seems both pertinent and relevant.

Reclamation Security

Requiring applicants to describe their reclamation security programs according to the prescriptive list given, is a substantial first step towards avoiding another Orphaned Well Association in Alberta. It is extremely logical that a specific plan be developed, drafted, and put down in print before an application is approved. The preparation of third-party reports estimating the costs for project reclamation provides another example of clear standards and puts all applicants on the same playing field, no matter their corporate size or generating capacity.

Anything that developers can do to assure The Commission, municipalities, and all other stakeholders that their plans for decommissioning and reclamation, including reclamation security, have been well-thought-out and expertly-prepared, is a step in the right direction.

Additional Comment: The Renewable Energy Projects on Agricultural Land Survey

The 35-question survey (see Appendix A) initiated by the Minister of Agriculture and Irrigation in August 2024, is included in this submission to illustrate the detail to which the topic of agricultural land for renewable projects has been explored by another level of government.

Stakeholder engagement, from the Alberta.ca consultation website (<https://www.alberta.ca/renewable-energy-development-on-agricultural-land-engagement>) is described to have taken place as follows:

Municipalities, renewable energy companies and agricultural landowners, including First Nations and Métis private landowners, were invited to share feedback on the following topics through an online questionnaire from July 24 to August 14, 2024:

- How should coexistence between agriculture and renewable energy production be defined, including monitoring, reporting and compliance?
- If there are agriculture and commercial activities on agricultural land, are there any challenges with land zoning and property tax considerations?
- How could native grassland protection be balanced with renewable energy development?
- Are the Land Suitability Rating System's soil classifications the best way to define 'productive agricultural land' or are there other options to use with or replace the classifications?
- When should the site assessment for commercial-scale renewable energy developments require an irrigability assessment?

While the survey has a few drawbacks from a communications standpoint, the most important facets of this survey include:

- The practicality of maintaining agricultural production within and around utility-scale renewables projects
- Potential for coexistence agreements to measure pre-installation agricultural productivity and maintain a certain proportion of that historical productivity for the lifetime of the project.
- Practical methods to report pre- and post-installation agricultural productivity and identification of the minimum productivity level accepted for particular parcels of land
- Emphasis on **productive** agricultural land and the "next-highest" land classes to be considered the most productive lands in the absence of Class 1 and 2 lands in a municipality
- An Irrigability Assessment could be required on certain parcels of land to provide a new level of protection for this agricultural potential
- The need to prioritize the conservation of native grasslands and quantify percentages of grassland sufficient to recommend avoiding an entire quarter-section

Bulletin 2024-09 Topics

Power Plant Applications

Approval Renewal Requirements

1. Should the Commission consider adopting standard construction periods for power plants that it will apply for new power plants going forward?
 - a. It seems like it would be inefficient to create a standard construction period when the size and technical requirements of each plant varies. It would make more sense to have proponents submit a project-specific Procurement Plan and Tentative Construction Schedule demonstrating that international supply chains and delivery times have been taken into consideration and are accounted for in their project's development.
2. What would be a reasonable initial period to construct?
 - a. Reasonable times to construct could be determined after evaluating a proponent's Procurement Plan and Tentative Construction Schedule. Smaller projects will take less time than larger ones and procurement of domestic and/or US materials will take less time than overseas procurements; these would be taken into account in the Procurement Plan.
 - b. Additionally, if an applicant states that they would not begin construction until 2 or more years into the future, this should not be considered as reasonable since they chose when to begin their project, when to apply to the AESO/AUC and Alberta's energy sources are rapidly transitioning. Renewables developers should not be allowed to impede that process through extensions for time to construct or through electing to construct 2-3 years after a project has been approved, as Westbridge Renewable Energy Corporation is attempting to do with their Dolcy project (Proceeding #28723).
3. Should the amount of time differ for different types of power plants?
 - a. The amount of time should be appropriate to the type and size of plant being constructed. Past projects have shown what typical construction schedules look like for different sizes and types of power plants and can be used as a guideline for future estimations of time needed to construct.
4. If the Commission were to implement a maximum number of time extensions allowed, what would be a reasonable number?
 - a. ONE! How can Alberta's transition to a lower-carbon economy happen if developers are not willing to construct immediately following regulatory approval? There should be an incentive to construct as quickly, post-approval, as if feasible. Alberta does not benefit from delays.

- b. Regardless of how long the entire process takes from conception to completion, if developers are not ready to construct upon approval, why are they being given extensions when their generation is needed now? If they are not ready to construct, their applications should be delayed; they should not be requesting extension after extension as that does not inspire confidence, exhibit due diligence, or increase their level of integrity.
5. Would a maximum length of time from the initial approval be a better metric than maximum number of time extensions?
 - a. Yes, absolutely. Then it can also match when AEPA reports and others that would expire as well possibly... for efficiency.
6. What reasons should be considered acceptable for a time extension to be approved?
 - a. Legitimate reasons could include supply chain breakdown, inadequate labor force, possibly even another global pandemic...
 - b. Unacceptable reasons would be mostly those related to financial constraints; if adequate funds to begin construction are not available at the time of approval, why has the developer even applied to receive approval? Is it just to save their place in some imaginary line until such time that anticipated funds materialize?

Agricultural Land

1. What are the impacts of a requirement for earlier soil field verification on Class 1 or 2 agricultural land?
 - a. Earlier soil verification on Class 1 or 2 land would confirm or correct desktop determinations while providing insight into any potential changes to project design for the accommodation of high-productivity agrivoltaics.
 - b. Soil verification should be required for all classes of productive land as some municipalities may not have any Class 1 or 2 land; their Class 3 or lower lands then become more valuable and worthy of protection rather than being excluded from it.
 - c. The impacts realized by applicants should be negligible since this testing, or something very similar, is normally performed immediately prior to the start of construction activities (known as the PDSA) so it is both an anticipated expense and an anticipated report. Changing to an earlier timing allows for the Commission to have more relevant and important information available prior to making a decision on a project. It also allows the developer opportunities to mitigate any problems encountered, well in advance of the construction start date.
2. What timing should be considered?
 - a. A soil verification report should be included as part of the application and is especially relevant to project reclamation; it is advantageous to consider soil

verification for reclamation purposes and agrivoltaic-potential concurrently, as well as earlier in the entire process, as opposed to post-approval..

3. What would the verification entail?
 - a. The verification would entail the taking of soil samples to specified depths and at specified distances by a qualified expert, for the entire project area.
4. What would the costs of doing this look like? Would they be prohibitive?
 - a. The costs of this should not be prohibitive since the verification is required prior to construction and should therefore be anticipated and accounted for financially.
5. Comment on these potential information requirements:
 - a. If farming currently takes place on the project lands, please provide further details about the type and rotation of these cultivated crops
 - i. This is an excellent information request. The production history for the lands in question assists all parties in knowing more about the value of the project lands and about the amount of agricultural production that will be lost should a project be approved.
 - b. If the project will be sited on productive agricultural land, describe how the benefits of this project will offset the loss of agricultural land.
 - i. This is another excellent question. Details over assumptions are what stakeholders are requesting. We cannot assume that the claimed benefits of any project will be able to offset the loss of agricultural land. Developers should have to prove their currently unproven claims.
6. What are the key constraints involved in co-locating agricultural activities with energy production?
 - a. The key constraint for solar is primarily the amount of land required to make constructing and operating a co-located facility economically feasible and viable. To co-locate solar with farming in a way that maximizes both agrivoltaic and photovoltaic potential, larger amounts of land than are already being used, would be needed to maintain the intended generation capacity while maintaining significant agriculturally-productive activities. Conversely, a requirement to co-locate agricultural activities could force developers to reduce generation capacity so that they can still “fit” within their original project footprint after design and panel layout changes due to an agrivoltaics component.
7. How is agricultural value considered in project siting?
 - a. Agricultural value is not very highly regarded by every developer I have been in contact with. At the first open house for Enerfin’s Big Rock project, stakeholders were told no agricultural land was being used by one corporate representative. This sparked a very emotional reaction from the crowd since the land in question is 100% Class 3 agricultural land currently seeded with canola and providing pasture for cattle as tame grassland. If a developer doesn’t hold agricultural land

- in a high enough regard to properly identify it to stakeholders, it says a lot about their level of attention to this area.
- b. Several other projects acknowledge the agricultural value of the land but do not give it top priority during site selection - other than knowing a nice flat piece of land is their top choice and agricultural land is among the flattest.
8. Please describe what a successful agrivoltaics operation looks like. Do these projects have production targets?
- a. A successful agrivoltaics operation is like a business inside of a business. Both elements should work seamlessly with each other maximizing the achievement of production targets, generation targets, and meeting all weed and pest management strategies
 - b. A successful agrivoltaics operation does not attempt to create new industries or radically upset current known production levels. Utilizing sheep is a prime example of an attempt to radically upset markets with unproven, haphazard plans with very little to no basis in reality.
9. Do you have a working definition of “best-use”?
- a. Consulting Chat GPT, a good working definition of “best-use of agricultural lands” is defined as:
 - i. The most sustainable and productive management of agricultural lands that optimizes crop and livestock yields, maintains soil health and biodiversity, conserves water and other natural resources, minimizes environmental impact, supports local economies, and ensures food security for present and future generations.

Land Suitability Rating System

1. How accessible is the LSRS? Are the limitations, basis of assessment methodology and its use, clear?
 - a. As a total layperson and general member of the public with 6+ years of university education, I have been able to learn and maneuver around the Alberta Soil Information Viewer with relative ease.
2. Do you contest the LSRS values and if so, what approach do you use to verify or contest the LSRS?
 - a. I have not seen a reason to contest these values yet. The most recent update to the database in March 2024 created a few waves for a few developers when their project lands changed from Class 3 to Class 2.
 - b. The best way to verify or contest the LSRS values is to perform field soil sampling in all affected soil polygons in the project area.

Renewable Power Plant Applications

Appropriate setbacks from residences and other important infrastructure

1. What would a reasonable setback for renewable project infrastructure to neighboring residences be?
 - a. A reasonable setback to neighboring residences would begin at 1600 metres and would apply to primarily solar and energy storage facilities. Wind projects would reasonably have at least a 5000 metre setback from neighboring residences.
2. How should the setback be measured (e.g., from closest infrastructure, from property boundary)?
 - a. The setback should be measured from the piece of infrastructure closest to the residential property.
3. What other infrastructure/facilities/ land should be subject to setbacks from renewable project infrastructure?
 - a. Provincially-designated ecological reserves and heritage rangelands as well as any culturally-significant landmarks and historic sites of interest
4. Should there be different setbacks for public vs. private facilities?
 - a. How do you define public vs. private facilities? Setbacks should be the same for both as in the future, the designation of a facility may change from public to private or from private to public. Consistency should be applied to all facilities.
5. Should the commission establish setbacks from renewable energy facilities to residences and other important infrastructure? (includes wind, solar, & battery storage)
 - a. Absolutely, the AUC should establish minimum setbacks which can be increased based on individual project considerations and municipal setback requirements.
6. Should the Commission treat wind power projects, solar power projects, and energy storage facilities differently when considering appropriate setbacks?
 - a. Yes, each type of facility has certain characteristics which differentiate it from other types. These differences will manifest in at least the two areas of setbacks and notification/consultation radii.
7. Should the Commission treat different types of infrastructure differently when considering appropriate setbacks for renewable energy facilities? (including residences, hospitals, schools, parks, roads, railways, airports, aerodromes, heliports, and industrial facilities)
 - a. Infrastructure that brings concentrations of people or livestock into frequent “contact” with a facility, should have setbacks applied to them (hospitals, schools, universities, animal processing facilities, feedlots).

- b. Critical infrastructure such as highways & roads, railways, and any currently installed grid infrastructure may require consideration for national security concerns in regards to appropriate setbacks
 - c. Are there other types of infrastructure the Commission should include in the list above?
 - i. Military installations should also be considered for setback distances in the interests of national defense and preventing siting near potential military targets.
8. What factors should the Commission consider when establishing setbacks for renewable energy facilities? (including noise, safety, fire risks, visual impacts, glare/shadow flicker, other environmental effects and agricultural impacts)
- a. The commission should consider all of the factors listed above in addition to one very significant factor identified by most property-adjacent landowners: property value impacts

Energy Storage Facilities

1. Should the interim requirements apply to energy storage facilities?
 - a. Yes, the interim requirements should apply to energy storage facilities since they are conducting business in the same environment as solar, wind, and other renewable energy sources.
2. Are checklist applications suitable for energy storage facilities under 10 MW? Under 1MW? If yes, provide any factors that the Commission should consider in establishing a checklist application for energy storage facilities (E.g., emergency response, site-specific risks)
 - a. Before asking if a checklist application would be suitable for facilities under 10 MW, should we not be asking why such a relatively small facility is being put forward on a utility-scale level? Today, three large-scale stand-alone storage projects are under development for 100 MW, 100MW and 200 MW of battery storage. What benefit does a 10 MW project bring to the grid?
 - b. For battery storage of under 1 MW, it would seem that this could serve a residential customer rather than the general public on the grid and so the qualifications would be significantly less than applications of larger capacities.

3. Can the use of setback distances serve as a proxy for air quality dispersion modeling? If so, what are the recommended setback distances and the basis for the distances, taking into account different battery chemistries, the size of the battery storage facility, and other factors?
 - a. As noted in recent air dispersion modeling reports for the Dolcy, Eastervale, and Laramide proceedings (#28723, #28847, and #28906 respectively), distances of 2000 metres and 6000 meters are consistently being utilized as significant parameters. It seems reasonable to expect that a minimum setback of 1600 metres would be in alignment with air dispersion modeling parameters.
 - b. Different battery chemistries and their resultant quantities could significantly affect air dispersion modeling results. The physical project footprint and maximum storage capacity
 - c. It is highly recommended that the Commission take into consideration, the additional factor risks associated with hydrogen fluoride (HF) and how air dispersion modeling can incorporate this important toxic emission into its framework.

4. Discuss the need for preliminary site-specific emergency response plans to be in place and finalized prior to construction and operations.
 - a. Preliminary site-specific emergency response plans are crucial for energy storage facilities and should be finalized before construction begins for several reasons:
 - i. Safety of Workers and the Public: A pre-established emergency response plan ensures that workers and emergency responders know how to act immediately, reducing the risk of injury or death.
 - ii. Regulatory Compliance: Many jurisdictions require emergency response plans as part of the permitting and approval process for energy storage facilities. Finalizing these plans before construction helps ensure compliance with local, provincial, and federal regulations, which can prevent delays or legal complications.
 - iii. Minimizing Environmental Impact: Emergency response plans include protocols for containing spills, leaks, or releases of hazardous materials, which are crucial for protecting the environment. In the event of an incident, a well-prepared plan can minimize contamination of soil, water, and air. Early planning ensures that appropriate resources, such as containment materials, firefighting equipment, and personnel, are allocated and available on-site, reducing response time and environmental impact.
 - iv. Coordination with Local Emergency Services: A site-specific emergency response plan facilitates effective communication and coordination with local fire departments, medical services, and law enforcement. This coordination is vital for ensuring that emergency responders are familiar with the site layout, potential hazards, and access points.

- v. Risk Management and Liability: A preliminary emergency response plan involves risk assessments to identify specific hazards related to the energy storage technology being used. By recognizing these risks early, steps can be taken to mitigate them, thereby reducing the likelihood of incidents. A comprehensive emergency response plan can reduce liability in the event of an incident by demonstrating that the facility took proactive steps to ensure safety and preparedness. This can protect the company from lawsuits, fines, and financial losses.
- vi. Operational Continuity: Effective emergency response plans can minimize operational disruptions caused by incidents. By having a clear plan, the facility can return to normal operations more quickly, reducing downtime and financial losses. Prompt and efficient response to emergencies can prevent or limit damage to equipment, infrastructure, and inventory, safeguarding the facility's investment.
- vii. Community Relations and Trust: Having an emergency response plan and communicating it to local stakeholders and communities demonstrates a commitment to safety and environmental stewardship.

Participant Involvement Program Considerations

Current State of Stakeholder Engagement in Alberta

- Prior to the pause on renewable generation facilities just over 1 year ago, the stakeholder engagement environment was very challenging, intimidating, and overwhelming for potential interveners in AUC proceedings. This resulted in only ONE project denial in favor of the position held by project-opposing intervener groups, the Foothills Solar Project at Frank Lake near Blackie in April 2022.
- Following the AUC Inquiry (Proceeding 28501) and the end of the moratorium on approvals, developers entered a stakeholder engagement environment of increased awareness & increasing literacy about renewable energy projects and increased guidance and support for interveners, especially for project-adjacent landowners and municipalities.
- Consultation challenges are becoming more prevalent as individual stakeholders and communities become more educated and informed about renewable generation, reliability, affordability, and visibility.
- In countries where renewable generation is prevalent and has existed for years longer than it has in Alberta, such as Australia, the problem of community engagement on renewable energy infrastructure developments precipitated the Australian Energy Infrastructure Commissioner's (AEIC) conducting of an independent Community Engagement Review, commissioned by the Minister for Climate Change and Energy in July 2023 and released to the public in February 2024.
- Alberta and the AUC are at a crossroads with the current Participant Involvement Program, rather than make the same mistakes that have occurred in Australia, both the Commission and community stakeholders can benefit from a conscious and meaningful review of Rule 007's Appendix A1 and A1-B (so that Indigenous groups are given the same considerations).
- Below is a sampling of projects in Alberta that are currently experiencing stakeholder engagement challenges; others may exist - these are the projects currently most familiar to the author.

Proceedings In Progress with Consultation Challenges

- Caroline (#28295) has recently been released from abeyance; this project was placed there due to the inadequate execution of their Participant Involvement Program and PACE was directed to go back and complete it properly before the Commission would continue further processing of their application

- Laramide (#28906) has recently requested a second abeyance after submitting an application only 59 days after first contact with project-adjacent landowners. The Frank Lake North Concerned Citizens Group (FLNCCG) provided some email pressure in requesting Enfinite hold a community engagement event in Blackie. Reluctant to host a presentation followed by Q&A in such a small community, the event was attended by over 100 residents of whom were all video-recorded for security purposes.
- Dolcy (#28723) experienced an outstanding number of challenges in consulting with affected stakeholders. A Participant Involvement Program Report (Exhibit 28723-X0121) was submitted for the David Lake Concerned Citizens (DLCC) and catalogued the many problems encountered in the applicant's PIP and more, for the Commission's consideration, possibly for the first time. Most noteworthy was the complete absence of contact with two numbered companies directly adjacent to the project. The landowners learned of the project from stopping and talking to a neighbor on the road, less than 14 days before the hearing was set to commence.

Anticipated Proceedings from Announced Projects

- Big Rock Solar Project by Enerfin (intending to apply September 16, 2024); consultation challenges have been present from the first day project-adjacent landowners began being notified of the project. Their publicly hosted open house at the East Longview Hall made both local newspapers as it was both very well-attended and community members greatly outnumbered the corporate employees and consultants present, creating tensions when stakeholder questions and concerns were not being adequately addressed. Most recently, a second public event was hosted for only the project-adjacent landowners and after participants sat down and were welcomed, they were notified that the RCMP could be showing up at any point during the evening.
- Lone Butte Solar Project by Acciona (intending to apply during September 2024); consultation challenges are expected to continue since this proponent scheduled its public engagement event from 5-8 pm on June 27th, 2024 and canceled it at 1:30pm the same day as the event, leaving community members unaware, possibly upset and quite likely, very confused. Upon review of the project website and open house poster boards ([Lone Butte website link](#)), further challenges are likely to be expected when Acciona chooses to communicate with the wider community for its proposed Social Impact Management Program for community benefits, given the cancellation of their public event with less than 4 hours notice. Acciona may have to change their stakeholder engagement focus to "reconciliation and education" for the short term and then negotiate any community investments or benefits they choose to offer local stakeholders at a much later date.

Community Engagement Review (Gov't of Australia, 2023-24)

Review Highlights

This review process, described in detail on page 3 of the Review (link below), was extensive. It held over 75 meetings throughout Australia, with more than 700 participants attending. The Review received over 500 written submissions and over 250 survey responses and the majority of these responses were received from landholders and community members living in close proximity to renewable energy infrastructure and new transmission infrastructure. The graphic below, from page 8 of the Review, shows that stakeholders' levels of satisfaction with the engagement practices of developers were very low.

Observations

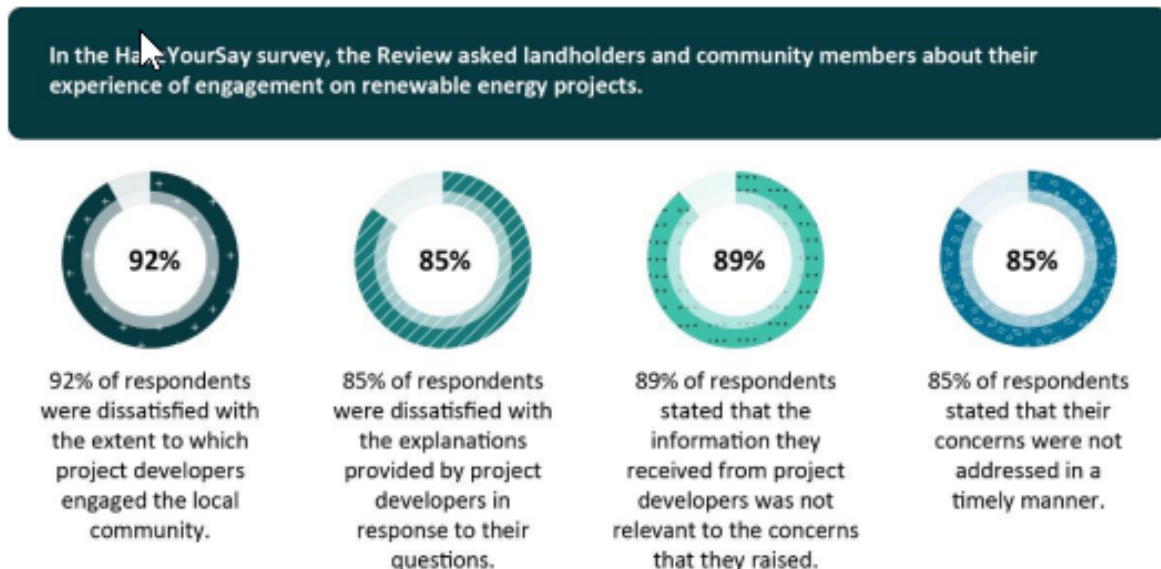


Image 2. Survey results indicate that landholders and community members were generally dissatisfied with the engagement that they received from project developers.

Quoted from this page of Australia's Department of Climate Change, Energy, the Environment and Water:

<https://www.dcceew.gov.au/energy/renewable/community-engagement/review#:~:text=The%20Australian%20Energy%20Infrastructure%20Commissioner,on%20renewable%20energy%20infrastructure%20developments>.

The Review made recommendations in the following areas to improve engagement with renewable energy infrastructure developments:

- encourage best practice and select reputable developers for new projects
- reduce unnecessary and onerous community engagement by improving the way project sites are selected
- make engagement more efficient by revising planning and approval processes
- improve complaint handling processes
- keep communities informed about the transition, including its goals, benefits and requirements
- equitably share the benefits of the transition.

The response from the Energy and Climate Change Ministerial Council (ECMC) can be found here:

<https://www.energy.gov.au/energy-and-climate-change-ministerial-council/energy-ministers-publications/response-to-aEIC-community-engagement-review>

Consequently, on July 19th, 2024, the ECMC released [National Guidelines for Community Engagement and Benefits for Electricity Transmission Projects](#), a 61-page report that has “been prepared to elevate and reinforce the importance of building social license with communities. These guidelines provide nationally consistent principles to deliver meaningful community engagement and local benefits for every transmission project in Australia.”

This resource, although prepared in regard to transmission projects, can easily be deemed as transferable to the stakeholder communications required for negotiating and navigating renewable energy generation and storage projects.

Recommendations Regarding Rule 007’s Current PIP

1. Create resources and materials to increase renewable energy literacy for the general population which can then be referred to stakeholders of all backgrounds.
 - a. The 2009 Alberta Nuclear Consultation workbook (which can STILL be found online here: <https://open.alberta.ca/publications/9780778563372#summary>), provides a relevant sample of two resources that could be adapted to suit all renewable energy project types. The first resource is educational and informative in nature while the second is a survey used to gather meaningful responses from more nuclear-literate participants.
 - b. This sample could be used as the basis for developing a template to increase levels of renewable energy literacy efficiently, effectively, and in a standardized manner.

2. Create resources and materials for project developers to assist them with updated standards and best practices for conducting stakeholder engagements.
 - a. The Energy Charter (<https://www.theenergycharter.com.au/>) and the Clean Energy Council (<https://cleanenergycouncil.org.au/>) are two organizations who provide free resources for project developers
 - b. These samples could be used as the basis for developing customized templates for the Alberta renewables environment.

3. Create resources and materials for project-hosting landowners to assist them with becoming renewable-energy literate prior to commencing negotiations with developers.
 - a. The Queensland Renewable Energy Toolkit (2023) (<https://www.energyandclimate.qld.gov.au/energy/energy-jobs-plan/local-energy-partnerships>) and the NSW Farmers Renewable Energy Landholder Guide (https://www.nswfarmers.org.au/NSWFA/NSWFA/Content/IndustryPolicy/Resource/Renewable_Energy_Landholder_Guide.aspx) are two samples of high-quality resources that could be implemented as guidance to create equivalent resources for Albertans.

4. Create resources and materials for Indigenous groups and municipalities to assist them with increasing their levels of renewable energy literacy enabling them to more actively and meaningfully participate in negotiations with developers and potentially, interveners. No samples have been provided as I have unfortunately, run out of time.

Thank you very much for your time and consideration.

Appendix A: Renewable Energy Project on Agricultural Land Survey

Your Role

Please review the following definitions before answering the next question:

- Agricultural Landowner: The individual or business entity holding the title(s) to the land farmed or ranched. This includes First Nations or Métis individuals or business entities that own agricultural lands off-Reserve and off-Settlement.
- Municipal Representative (including Special Areas): Agriculture Service Board staff, Municipal Elected Councilor, Municipal Planning and Development staff or Local Municipal Planning Authority staff.
- Métis Settlement Representative: Métis Settlement representatives that have responsibility for land use decisions.
- Irrigation District Representative: An irrigation district board member or manager from an irrigation district in Alberta.
- Renewable Energy Company: Person(s) involved in the siting and construction (i.e., pre-grid connection) and/or the operation and closure/reclamation (i.e., post-grid connection) phases of a renewable energy project.

This also includes initial contractual arrangements and/or implementing any initial (or amended) contractual arrangements with the registered owner of the land where the project is to be sited.

1. Which of the following roles, defined above, best describes you?*
 - a. Agricultural landowner
 - b. Métis Settlement representative
 - c. Irrigation district representative
 - d. Municipal Representative (including Special Areas)
 - e. Renewable energy company
 - f. Other 2. Please select the option that best describes you as an agricultural landowner:*
 - a. I farm all my land myself
 - b. I rent all my land to others to farm
 - c. I farm some of my land myself and rent some land to others 3. What best describes the current status of your farming operation?
 - a. Downsizing my operation
 - b. Maintaining my operation's current scale
 - c. Expanding my operation 4. What is the main focus of your operation?*
 - a. Crop production (including horticulture)
 - b. Livestock production
 - c. Mixed operation 5. Which county or municipal district is most of your agricultural land in?*
- Fill in the blank here*

6. What is the total area of the agricultural land you own?
 - a. Up to a half section (less than 320 acres)
 - b. Up to 1 section (321 to 640 acres)
 - c. 1 to 2 sections (641 to 1,280 acres)
 - d. 2 to 3 sections (1,280 to 2,500 acres)
 - e. 3 to 8 sections (2,500 to 5,000 acres)
 - f. More than 8 sections (over 5,000 acres)

Co-existence

- Agricultural Land: for this assessment, this includes privately owned cropland (irrigated or dryland), native grassland, and tame pasture.
- Coexistence: for the purposes of this policy, this means that on Alberta’s productive agricultural lands, agricultural production and renewable energy must coexist on the same land. The agricultural productivity level must be maintained to a percentage of pre-development productivity.
- Renewable Energy Development: for the purposes of this questionnaire, renewable energy development means solar or wind energy projects. Geothermal and biomass energy project developments are out of scope.
- The following questions ask about the practicality of maintaining agricultural production within and around utility scale renewable energy development types.
- Utility scale renewable energy includes solar and wind developments that have the capacity to generate more than 5MW of electricity.

7. Do you currently have any utility scale renewable energy developments on your agricultural land? *
 - a. Solar power
 - b. Wind power
 - c. None of the above

8. To what degree do you think utility scale renewable energy development could impact your ability to produce crops or livestock on the same parcel? *

	Major impact	Some impact	Minor impact	No impact	Unsure
Solar power	Solar power Major impact	Solar power Some impact	Solar power Minor impact	Solar power No impact	Solar power Unsure
Wind power	Wind power Major impact	Wind power Some impact	Wind power Minor impact	Wind power No impact	Wind power Unsure

Co-existence

The following questions ask about the practicality of maintaining agricultural production within and around utility scale renewable energy development types.

Utility scale renewable energy includes solar and wind developments that have the capacity to generate more than 5MW of electricity.

9. If a developer was interested in installing a utility scale solar power operation on your agricultural land, are you willing to ensure farming continues on the same parcel?*
 - a. Not at all willing
 - b. Somewhat willing
 - c. Very willing
 - d. Unsure

10. Would you be open to any of the following arrangement types to ensure farming continues on the same parcel of land as a utility scale solar power operation?
 - a. Farm the land myself
 - b. Company sub-leases to another farmer
 - c. Company works with farmer currently sub-leasing the land to maintain farming
 - d. Other (please specify)

Co-existence

The following questions ask about the practicality of maintaining agricultural production within and around utility scale renewable energy development types.

Utility scale renewable energy includes solar and wind developments that have the capacity to generate more than 5MW of electricity.

11. If a developer was interested in installing a utility scale wind power operation on your agricultural land, are you willing to ensure farming continues on the same parcel?*
 - a. Not at all willing
 - b. Somewhat willing
 - c. Very willing
 - d. Unsure

12. Would you be open to any of the following arrangement types to ensure farming continues on the same parcel of land as a utility scale solar power operation?
 - a. Farm the land myself
 - b. Company sub-leases to another farmer
 - c. Company works with farmer currently sub-leasing the land to maintain farming
 - d. Other (please specify)

Co-existence

The policy would require coexistence agreements to demonstrate that a certain portion of pre-installation agricultural land productivity (measured in “units” per acre as an example) is maintained after renewable energy installation.

For illustration purposes, if the land produced 100 units per acre before renewable energy was installed (pre-installation productivity), then 50% of pre-installation land productivity would be 50 units per acre after renewable energy was installed (post-installation productivity). In summary:

- Pre-installation productivity = 100 units per acre produced before renewable energy development
- Post-installation productivity (50%) = 50 units per acre produced after renewable energy development

How could coexistence with renewable energy developments be tracked in terms of pre- and post-development productivity?

13. What is the most practical way to report pre- and post-installation agricultural productivity on land coexisting with renewable development? *
 - a. Gross revenue
 - b. Net income
 - c. Production yield (e.g., average bushels per acre, pounds per acre, animal units per acre)
 - d. None of the above

14. What is the minimum agricultural productivity level prior to installing renewable energy infrastructure that must be maintained (via co-existence agreements) post-installation? *
 - a. At least 20%
 - b. At least 40%
 - c. At least 60%
 - d. At least 80%
 - e. Unsure

15. Can you suggest other ways to measure and report agricultural land productivity?
Fill in the blank here

16. How many years of production records do you have available for your operation, by quarter section? *

	Up to 2 years of data	3 to 5 years of data	5 or more years of data	N/A
Gross revenue	Gross revenue Up to 2 years of data	Gross revenue 3 to 5 years of data	Gross revenue 5 or more years of data	Gross revenue N/A
Production yield information (e.g., from a yield monitor)	Production yield information (e.g., from a yield monitor) Up to 2 years of data	Production yield information (e.g., from a yield monitor) 3 to 5 years of data	Production yield information (e.g., from a yield monitor) 5 or more years of data	Production yield information (e.g., from a yield monitor) N/A

Co-existence

Co-existence means that on Alberta’s highest productive agricultural lands, agricultural production and renewable energy must co-exist on the same land. For this policy's purposes, the productivity level must be maintained to a percentage of pre-development productivity. The following questions ask about the practicality of maintaining a viable farming operation within and around renewable energy development types.

Please indicate whether you agree or disagree with the following statements:

17. Crop production and solar power development can co-exist on the same parcel of agricultural land.*

Disagree

Agree

Unsure

18. Why do you think crop production and solar power development can co-exist on the same parcel of land?

Fill in the blank here

19. Livestock grazing and solar power development can co-exist on the same parcel of agricultural land.*

Disagree

Agree

Unsure

20. Why don't you think livestock grazing and solar power development can co-exist on the same parcel of land?

Fill in the blank here

Co-existence

Coexistence means, for the purposes of this policy, that on Alberta's productive agricultural lands, agricultural production and renewable energy must coexist on the same land. For this policy's purposes, the agricultural productivity level must be maintained to a percentage of pre-development productivity.

The following questions ask about the practicality of maintaining agricultural production within and around utility scale renewable energy development types.

Please indicate whether you agree or disagree with the following statements:

21. Crop production and wind power development can co-exist on the same parcel of agricultural land.*

a. Disagree

b. Agree

c. Unsure

22. Livestock grazing and wind power development can co-exist on the same parcel of agricultural land.*

a. Disagree

b. Agree

c. Unsure

23. Why don't you think livestock grazing and wind power development can co-exist on the same parcel of land?

Fill in the blank here

Productive Agricultural Land

As part of Alberta's "Agriculture First" approach, Alberta's government committed to establishing the tools necessary to ensure Alberta's native grasslands, irrigable and productive lands continue to be available for agricultural production. Productive agricultural lands pertain to agricultural productivity only.

24. Alberta's most productive agricultural land should be prioritized for food production.*
- Strongly disagree
 - Somewhat disagree
 - Somewhat agree
 - Strongly agree
 - Unsure
25. If a county or municipal district doesn't have any [Land Suitability Rating System \(LSRS\)](#) Class 1 or 2 land, the next highest classification should be considered as the most productive agricultural land.*
- Strongly disagree
 - Somewhat disagree
 - Somewhat agree
 - Strongly agree
 - Unsure
26. Can you suggest any other ways to identify "productive agricultural land" other than the Land Suitability Rating System?
Fill in the blank here

Irrigability

The proposed policy approach avoids using currently irrigated agricultural land and would require an irrigability assessment on certain parcels of land.

The [Classification of Land for Irrigation in Alberta](#) has different assessment levels, each with different requirements. Irrigability assessments can be onerous and costly, depending on assessment level and purpose.

27. Which of the following characteristics should exempt a parcel of land from a required irrigability assessment? Select all that apply: *
- Distance from existing irrigation infrastructure
 - Located outside of Irrigation Districts
 - Distance from naturally occurring water sources
 - Receives over 300 mm of annual precipitation (30-year average)
 - Other (please specify)

Native Grasslands

"Alberta's government will establish the tools necessary to ensure Alberta's native grasslands, irrigable and productive lands continue to be available for agricultural production."

Native grassland: A landscape unit where the vegetation is dominated by grasses, grass like plants, and/or forbs (>50%). For example, if an air photo review shows a unit with 45% scattered woody species canopy cover and 55% grass species canopy cover, it would still be defined as a grassland.

For grasslands to be defined as “native” according to the [Alberta Public Lands Glossary of Terms](#) (p10), they must be comprised of greater than 30% foliar cover of native grassland species (vegetation inventory required to verify). Modified native grasslands have <30% cover of native species.

Please indicate whether you agree or disagree with the following statements:

28. Native grasslands and _____ developments can co-exist on the same parcel of agricultural land.*

	Strongly disagree	Disagree	Agree	Strongly agree	Unsure
Solar power	Solar power Strongly disagree	Solar power Disagree	Solar power Agree	Solar power Strongly agree	Solar power Unsure
Wind power	Wind power Strongly disagree	Wind power Disagree	Wind power Agree	Wind power Strongly agree	Wind power Unsure

29. How important is it to prioritize the conservation of native grasslands in Alberta?*

- a. Not at all important
- b. Not very important
- c. Somewhat important
- d. Very important
- e. Unsure

30. What minimum percentage of a quarter section (160 acres) needs to be covered by native grassland to recommend avoidance of the entire quarter section for renewable energy development?*

- a. 30% (48 acres is native grassland)
- b. 40% (64 acres is native grassland)
- c. 50% (80 acres is native grassland)
- d. 60% (96 acres is native grassland)
- e. 70% (112 acres is native grassland)
- f. 80% (128 acres is native grassland)
- g. 90% (144 acres is native grassland)
- h. 100% is native grassland

31. Are there any circumstances where any renewable energy development on native grasslands would be acceptable? *

- a. Yes
- b. No
- c. Unsure

32. Do you have anything else to share about renewable energy development on native grassland?

Fill in the blank here

Conclusion

33. What is your overall level of concern about having agricultural and utility scale renewable energy production on the same parcel of land? *

	Not at all concerned	Not very concerned	Somewhat concerned	Very concerned	Unsure
Solar power	Solar power Not at all concerned	Solar power Not very concerned	Solar power Somewhat concerned	Solar power Very concerned	Solar power Unsure
Wind power	Wind power Not at all concerned	Wind power Not very concerned	Wind power Somewhat concerned	Wind power Very concerned	Wind power Unsure

34. Do you have anything else to share about renewable energy development on agricultural land?

Fill in the blank here

35. How was your experience sharing your input today?

- Poor
- Acceptable
- Good