



November 14, 2024

Patrick Schembri
Alberta Utilities Commission
1400 600 Third Ave. S.W. Calgary, AB T2P 0G5
North Petroleum Plaza

Submitted by email to: engage@auc.ab.ca

Dear Patrick Schembri,

The Canadian Renewable Energy Association (CanREA) appreciates the opportunity to provide feedback to the Alberta Utilities Commission (AUC) on the role of Agents in AUC proceedings. CanREA supports the use of agents in proceedings but suggests that the AUC consider developing criteria to allow paid agents to participate in hearings. Criteria could include being a member of an affected community or community group and have previously attempted to work with developers prior to a hearing.

Our association represents more than 300 companies active in the Canadian renewable energy market, including manufacturers, operators, developers and service providers to the wind, solar and energy storage industries. CanREA members are proud to be creating jobs for Albertans, delivering low-cost electricity to consumers, and making the province more competitive. Since 2019, Alberta's market-based approach to electricity production has resulted in over \$3.7 billion in investments in wind and solar generation, supporting 4,500 jobs, as well as millions of dollars in property taxes for rural municipalities and lease payments for rural landowners.

Project developers and owners in Alberta follow rigorous environmental assessment, siting, stakeholder consultation, and regulatory approval requirements. In particular, local stakeholder consultation and engagement is a significant priority to our members who go to great lengths to provide stakeholders with all available information at various stages of the development process and to address and mitigate stakeholder concerns.

CanREA is concerned agents may be trying to negatively interfere in legitimate stakeholder consultations between our members and affected parties and thus interfering with the proper functioning of AUC hearings. It is essential to the AUC's Participant Involvement Program that our members have open dialogue early and often with affected stakeholders to work through their specific concerns and potential solutions to mitigate those specific concerns. The Commission has previously ruled that the consultation requirements under Rule 007 are a two-way street that applies to proponents in addition to all stakeholders. It has confirmed that consultation is only effective if stakeholders make their concerns known to the proponent so that those concerns may be discussed and potential solutions considered. These agents sometimes use social media to encourage residents to give minimal information which runs counter to the process of identifying and resolving stakeholder concerns and ultimately leads to unnecessary hearings.

Our members have found that these agents have a negative impact on consultation efforts and disrupt direct lines of communication with stakeholders causing project AUC proceedings to go to hearings (potentially unnecessarily). The price tag to some of our members of the interference of these agents is large and has resulted in raising project costs between \$500,000 and \$1,000,000 by not allowing our members to work directly with potentially affected parties to find mutual solutions. Some of these

agents are not persons who reside, occupy or otherwise have claim to lands with legal land descriptions of proposed projects.

In closing, CanREA supports paid agents but we believe that the AUC should ensure that false or misleading information should be vetted to ensure the integrity of the Commission's processes. We also believe that paid agents should meet criteria set out by the AUC on their role and function in the proceedings. CanREA would like to continue to engage with the AUC as requirements are developed around paid agents and provide our members perspectives on the criteria. If you have any questions about our recommendations or would like to discuss in more detail, please reach out to me at rjagopalan@renewablesassociation.ca.

Sincerely,



Radha Rajagopalan
Alberta Director
Canadian Renewable Energy Association