

May 1, 2025

**Subject: 007 Rule Feedback**

Submitted via email: [engage@auc.ab.ca](mailto:engage@auc.ab.ca)

ATCO Gas & Pipelines Environmental Governance & Planning department has reviewed the proposed changes to AUC Rule 007 Facility Applications. These proposed revisions were reviewed using the Alberta Utilities Commission (AUC) issued version of the rule formerly known as Rule 007: Applications for Power Plants, Substations, Transmission Lines, Industrial System Designations, Hydro Developments and Gas Utility Pipelines.

As a result of our review, we have four comments, which have been identified below. We request more clarity on some of the additional statements added to the rule. Further, we request language modifications to some statements added to the rule.

If you have any questions regarding the comments, please contact Julian Marchand, Supervisor, Environmental Governance & Planning, at 587.578.0464, email: [julian.marchand@atco.com](mailto:julian.marchand@atco.com).

Section	Proposed Revision	Issue	Suggested Change
GU26 (previously GU27)	"Provide all definitions and standards (i.e., Alberta Wetland Identification and Delineation Directive) used to prepare this description."	To provide all definitions is overly burdensome when those definitions can be found within the standards.	Suggest modifying language of this additional statement, "Cite all environmental regulations, policies, or standards used to prepare this description (i.e. Alberta Wetland Identification and Delineation Directive)."
	"Indicate the respective practice areas, practice standards or standards of competence demonstrated by these individuals."	Additional information (ie. definitions) required.	Requesting definitions be added to understand the added statement, including "practice area", "practice standards", and "competence"
Appendix A1-B – Participant involvement program guidelines for Indigenous groups	"An applicant for an electric facility or gas utility project on a First Nation reserve must apply to the AUC for approval and meet the application requirements listed in Rule 007, Rule 012 and Rule 033."	Clarification of statement within section 5 required.	Request clarity on the statement noted in proposed revision column – it reads as though every project on Indigenous lands requires an AUC application, regardless of whether the works are exempt under section 13.1 and 13.2.
	"This could, for example, include an environmental assessment completed by a qualified biologist or evidence of review from Indigenous Services Canada."	Clarification of statement within section 6 required.	Request clarity that "evidence of review from Indigenous Services Canada" would include proof of project submission to ISC, such as email communication, not exclusively the signed Project Description Form. Suggest, "...evidence of review from Indigenous Services Canada (e.g., communication from ISC)."