

May 23, 2025



AltaLink Comments on Bulletin 2025-02

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Subject: Rule 007 consultation submissions

Submitted via email: engage@auc.ab.ca

Further to [Bulletin 2025-02](#), AltaLink Management Ltd., as General Partner of and on behalf of AltaLink, L.P. (AltaLink), has reviewed the proposed changes to AUC Rule 007: *Facility Applications* (Rule 007). AltaLink is supportive of the ongoing efforts by the Alberta Utilities Commission to streamline regulatory processes. AltaLink's comments with respect to the proposed changes are outlined in the table below. AltaLink's comments focus on the issues specific to transmission facility owners (TFOs) and identify where proposed changes to Rule 007 require more clarity or pose a challenge to implement.

Any communication related to these submissions should be directed to Elizabeth Coyle at elizabeth.coyle@altalink.ca, and Nora Panahi at regulatory@altalink.ca.

Yours truly,

A handwritten signature in black ink that reads "Elizabeth Coyle". The signature is written in a cursive, flowing style.

Elizabeth Coyle
Director, Law and Data Integrity

Section		AltaLink Input
Section 7.2.1 Information requirements for transmission/ substation facility applications	TS17	AltaLink notes that the siting/routing process for certain transmission facility projects may differ depending on the scope and location of the proposed project. On this basis, AltaLink seeks clarity with respect to whether the Commission will consider TS17 to be satisfied if the applicant describes the process for routing/siting the proposed transmission facility, but does not describe each item listed in the proposed TS17 (e.g. identifying a study area, providing subsequent route/site revisions), provided that the applicant explains why such items are not applicable, with reference to accepted routing principles or constraints.
	TS18	<p>AltaLink recommends further revisions to proposed TS18 so that applicants are required to identify their preferred route, with reference to the quantitative and qualitative descriptions referred to in proposed TS18, rather than the specific reference to the route with the “lowest overall impacts”. AltaLink recommends this revision because route impacts are subjective and “lowest” implies a formulaic approach. In practice, AltaLink relies on its professional judgement to balance various impacts during the routing/siting process, which approach is aligned with recent Commission decisions, including the following from Decision 28957-D01-2025:¹</p> <p>“The Commission also takes further guidance from Decision 2009-028, which set out that route decisions cannot be reduced to a mathematical formula applied to charts that rank various criteria. The Commission must assess various factors to consider the overall potential impact of a route [emphasis added]. With consideration of mitigations for potential impacts, it could be that only certain factors become significant in determining the least impactful route.”</p> <p>On this basis, AltaLink suggests that the proposed change to TS18 be revised to require applicants to, “identify the preferred proposed transmission facility route/site and provide quantitative (e.g., metric tables) and qualitative descriptions of the potential effects and comparisons to any other proposed routes/sites”.</p>
	TS23	Proposed part (iv), requires applicants to include further details in cross sections drawings, including the “[p]roposed transmission line conductor height”. To help improve clarity for stakeholders, AltaLink suggests that applicants should also include the corresponding maximum equipment height restriction associated with those line clearances in contemplation of vehicles or equipment passing under the line, where appropriate. In

¹ Decision 28957-D01-2025 - Transmission Line 799L Rebuild, Mar 4, 2025, at para 15.

		AltaLink's experience, maximum equipment height restrictions are useful information for stakeholders and would facilitate stakeholder engagement.
	TS24	AltaLink seeks confirmation that fibre optic lines will not be included as part of this requirement. The location of fibre optic lines often shifts once other below ground locating is conducted. On this basis, providing accurate information in the facility application would be impractical.
	TS26	<p>AltaLink's practice has, and continues to be, to consult with municipalities on projects and incorporate feedback from the municipalities where possible. However, Section 3 of the <i>Planning Exemption Regulation</i>,² exempts transmission lines from Part 17 of the <i>Municipal Government Act</i> (MGA) and the regulations.³ Part 17 of the MGA contains requirements respecting planning and development.</p> <p>Furthermore, in AltaLink's experience, many municipal planning documents do not specifically address transmission lines, therefore, there is little formal direction related specifically to the planning and development of transmission lines. AltaLink's current practice is not to engage in the municipal planning process and AltaLink does not seek or require municipal development permits for its projects.</p> <p>Given the legislative framework and practical matters described above, Altalink recommends that any requirements on TFOs to consult with municipalities do not include specific requirements to comply with municipal planning documents, or justify non-compliance with those documents.</p>
	TS27	<p>AltaLink seeks clarification on the "standards" referred to in the first bullet point. AltaLink is aware of regulations, guidelines, directives, protocols, codes of practice, conditions of approval and criteria, but not of specific published standards from the Government of Alberta with respect to environmental conditions.</p> <p>AltaLink seeks further clarification on proposed changes related to the qualifications of the individuals who conduct or oversee the environmental evaluation, as described in the eighth bullet. AltaLink's practice is to ensure it retains qualified individuals to carry out environmental work. Accordingly, all environmental reports prepared by AltaLink or its contractors are stamped by an appropriate professional with a corresponding professional designation. AltaLink seeks confirmation that the proposed TS27 could be satisfied by filing</p>

² *Planning Exemption Regulation*, 223/2000.

³ RSA 2000, c M-26. Part 17 of the MGA is "Planning and Development". AltaLink also notes that pursuant to Section 619(1) of the MGA, an AUC approval prevails over certain authorizations, including municipal statutory plans and land use bylaws.

		environmental reports with either a curriculum vitae or a professional stamp, in accordance with professional practice standards.
	TS35	The Alberta Ministry of Arts, Culture and Status of Women (ACSW) has advised AltaLink that it will not issue a permit to complete a Historic Resource Impact Assessment (HRIA) until AltaLink can confirm which route will be constructed. A HRA approval cannot be issued until an HRIA is completed. For projects on which multiple routes are being considered (i.e., preferred and alternate routes), AltaLink cannot provide this confirmation to ACSW until after the Commission has issued its decision respecting the facility application. On this basis, AltaLink notes that TFOs will be unable to meet the requirements of the proposed TS35.
Section 7.2.2 Amendments		AltaLink supports the additional clarity reflected in the proposed revisions with respect to like-for-like replacements of transmission structures. AltaLink seeks further clarification on whether a change in structure type, with no changes to the right-of-way, and within the allowable height change, would be considered a like-for-like change that does not require filing an application (<i>e.g.</i> changing an H-frame transmission structure to a monopole transmission structure of the same height within an existing right-of-way).
Decommission and salvage or cancellation for transmission facilities	DST8	The proposed change to DST8 requires applicants to summarize consultation with local municipal jurisdictions. AltaLink seeks further clarification on when it must consult with local jurisdictions with respect to decommissioning and salvaging its facilities. In Appendix A1, the Commission requires personal notification to “occupants, residents, landowners, local authorities, First Nation reserves, and Metis Settlements and other utilities on or directly adjacent to the existing facility right-of-way.” There are currently no consultation requirements reflected in Table A1-1 for transmission facility decommission and salvage projects.



Table A1-1: Electric facility application notification and consultation requirements		<p>AltaLink notes the proposed addition to Table A1-1 specifically addressing consultation and notification requirements for “minor substation developments” in an urban area where there is no increase in operating noise or fence line. AltaLink recommends further revisions to Table A1-1 to reflect that the same consultation and notification requirements apply to minor substation developments in rural and industrial areas, when there is no increase in operating noise or substation fence line. Altalink submits, under the same circumstances (<i>i.e.</i> no additional noise or fence line changes) these same notification and consultation requirements should apply.</p> <p>AltaLink seeks further clarification on whether a change to the substation fenceline which reduces the overall fenced area would have the same consultation and notification requirements. In particular, would a project which reduces fenceline still qualify as a minor substation development for the purpose of notification and consultation?</p>
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