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May 23, 2025

Alberta Utilities Commission
Eau Claire Tower
1400, 600 Third Avenue S.W.
Calgary, Alberta T2P 0G5

Attention: Kim Macnab

Dear Kim Macnab:

Re: EPCOR Distribution & Transmission ("EDTI")
Response to Bulletin 2025-02: Changes Proposed to Rule 007

1. EDTI submits this letter in response to Bulletin 2025-02 issued by the Alberta Utilities Commission ("AUC" or the "Commission") on March 24, 2025, which sought stakeholder comments on the Commission's revised draft version of AUC Rule 007 ("Revised Rule"). EDTI appreciates the opportunity to provide feedback on the Revised Rule.

2. EDTI is impacted by AUC Rule 007 primarily through its work on electric transmission facilities, and thus reviewed the following sections of the Revised Rule and, where applicable, provides its comments organized by those sections:

- Section 7.2 (Transmission line, substation and other transmission facility applications);
- Section 8 (Time extension applications for transmission facilities);
- Section 9 (Decommission and salvage for transmission facilities);
- Section 11 (Interconnection applications);
- Section 16 (Glossary); and
- Appendix A1 and A1-B.

Section 7.2 (Transmission line, substation and other transmission facility applications)

3. With respect to the proposed changes in Section 7.2 of the Revised Rule, EDTI provides the following feedback and/or requests for clarity on the following proposed content changes.

<table>
<tr><td>1</td><td colspan="2">TS12 – Transmission-level equipment</td></tr>
<tr><td colspan="2">Revised Rule (blackline), PDF page 105
TS12) Describe all major substation equipment being applied for, including the height of any telecommunications structure, and provide a list of the final major equipment<u>, including only transmission-level equipment</u> that would be in the substation.
[emphasis added]</td><td>Existing Rule 007
TS12) Describe all major substation equipment being applied for, including the height of any telecommunications structure, and provide a list of the final major equipment that would be in the substation.</td></tr>
<tr><td colspan="3">Comment
EDTI generally understands “transmission-level” is in reference to nominal voltage levels greater than 25 kilovolts (kV) when describing electrical assets/equipment installed or proposed to be installed within electrical facilities. EDTI suggests the following revision to improve clarity as the term “transmission-level” is not defined in the Rule.

TS12) Describe all major substation equipment being applied for, including the height of any telecommunications structure, and provide a list of the final major equipment <u>that is greater than 25 kilovolts (kV)</u> that would be in the substation. <u>[emphasis added]</u></td></tr>
<tr><td>2</td><td colspan="2">TS16-18 – Routing and siting</td></tr>
<tr><td colspan="2">Revised Rule (blackline), PDF page 106
TS16) Describe the methodology for routing/siting the proposed transmission facility, including the principles and criteria used in identifying and assessing routes/sites, and how information and stakeholder feedback was incorporated.

TS17) Describe the process used for routing/siting the proposed transmission facility, including identification of a study area, preliminary route/site identification, subsequent route/site revisions, and selection of final route(s)/site(s). Provide rationale for siting decisions, such as adding, modifying or removing routes/sites.

TS18) Identify the proposed transmission facility route/site that the applicant considers to have the lowest overall impacts and provide quantitative (e.g., metric tables) and qualitative descriptions of the potential effects and comparisons to any other proposed routes/sites. If the route alternatives are segmented, include a comparison of the effects of each segment to the effects of its corresponding alternative segments.</td><td>Existing Rule 007
TS16) Describe any transmission line routing alternatives to the proposal, and compare the relative effects (environmental, social and economic, including any associated distribution costs) of these alternatives with the proposal. If the alternatives are segmented, include a comparison of the effects of each segment to the effects of its corresponding alternative segments.</td></tr>
</table>

Comment

The routing and siting information requirements in the Revised Rule align with EDTI's current practices for documenting its routing and siting methodology, processes, project-specific decisions, and detailed route/site descriptions in its facility applications for new transmission facilities.

EDTI believes that it would be helpful for the Commission to provide clarification in the Revised Rule on the level of detail required regarding routing and siting information requirements for minor projects as documentation for projects with a smaller scope (e.g., short transmission line taps, minor transmission line re-alignments, expansions of existing substation, etc.) may not always be necessary and adds regulatory burden for the applicant. Alternatively, EDTI requests additional wording that allows the applicant to use its discretion on the level of detail that is provided for smaller, less impactful projects.

3	**TS23(ii) – Map of consultation and notification boundaries**
Revised Rule (blackline), PDF page 107 *ii. Legible maps of the proposed facilities showing:* • *The preferred transmission line route and any alternative routes or segments.* • *Right-of-way widths.* • *Location of the transmission line on the right-of-way.* • *Location of the transmission line relative to property lines.* • *Kilometre points along each transmission line route.* • *Consultation and notification **radius** boundaries described in Appendix A1 – Participant involvement program guidelines, Table A1-1: Electric facility application notification and consultation requirements.* ***[emphasis added]***	**Existing Rule 007** *ii. Legible maps of the proposed facilities showing:* • *The preferred transmission line route and any alternative routes or segments.* • *Right-of-way widths.* • *Location of the transmission line on the right-of-way.* • *Location of the transmission line relative to property lines.* • *Kilometre points along each transmission line route.*

Comment

EDTI can provide a map of the letter carrier walk distribution area or a map of the approximate notification area when unaddressed mail (i.e.: postal codes associated with a letter carrier walk) is used to notify potentially impacted stakeholders for a project, in lieu of a map of the notification radius boundary, which may vary due to the irregular shape of the area covered by letter carrier walks.

EDTI requests the Commission consider removing the word "***radius***" from the description of this information requirement in the Revised Rule.

4	**TS23(iv) – Transmission structure drawings**
Revised Rule (blackline), PDF page 107 *iv. A legible transmission facilities structure and cross-section drawing series showing:* • *Proposed right-of-way width.* • *Proposed structure type.* • *Proposed structure height and width.* • *Proposed transmission line conductor height.*	**Existing Rule 007** *iv. Legible maps showing the most relevant environmental features, wildlife and aquatic habitat, ecological communities, environmentally sensitive areas, protected areas and designations present in the local study area.*

Comment

EDTI does not typically have final detailed design completed prior to filing a facility application and typically provides a range of values for each requested dimension (e.g., right-of-way width, structure height and width, conductor height) based on the level of design complete at the time of filing. EDTI recommends the following revised wording:

iv. A legible transmission facilities structure and cross-section drawing series showing ***the range of dimensions for each of the following****:*

- *Proposed right-of-way width.*
- *Proposed structure type.*
- *Proposed structure height and width.*
- *Proposed transmission line conductor height.*

[emphasis added]

EDTI also notes that the environmental map requirements currently identified as TS23(iv) will be renumbered to TS27 in the Revised Rule.

5	**TS24 – Keyhole Markup Language**
Revised Rule (blackline), PDF page 107 *TS24) Provide a Keyhole Markup Language (.kml/.kmz) file that reflects the information shown on the drawings and maps submitted to address* ***information requirement TS21****. The file should contain the geospatial data (geometry, location and attributes) of each of the major components. See the glossary definition for .kml/.kmz files for detailed specifications.* ***[emphasis added]***	**Existing Rule 007** *TS22) Provide a Keyhole Markup Language (.kml/.kmz) file that contains the geographic data of the transmission line centrelines for all applied for transmission route options and substation locations. This file should reflect the information shown on the drawings and maps submitted to address information requirement TS21.*

Comment

EDTI notes the reference to "information requirement TS21" refers to the current Rule 007 and should be updated to reflect the corresponding information requirement in the Revised Rule (i.e.: "TS23").

6	**TS27 – Environmental information**
Revised Rule (blackline), PDF page 108 *TS27)* [various changes]	**Existing Rule 007** *TS24)*

Comment

The amended environmental requirements in the Revised Rule align with EDTI's current practices for documenting environmental information (i.e.: typical contents of an Environmental Evaluation and Environmental Protection Plan) for larger transmission projects. However, EDTI requests clarification on the level of documentation required for environmental information requirements for minor projects to ensure that regulatory burden is minimized. Alternatively, EDTI requests additional wording that allows the applicant to use its discretion on the level of detail that is provided for smaller, less impactful projects.

For example, EDTI would not typically include maps of temporary/permanent workspace areas and relevant valued ecosystem components of the local study area for minor projects that require an application to the Commission.

7	**TS35 – Historical Resources Act approval**
Revised Rule (blackline), PDF page 111 *TS35) Provide the Historical Resources Act approval. If a historic resource impact assessment is required, briefly describe any known*	**Existing Rule 007** *TS31) Confirm that a Historical Resources Act approval has been obtained or has been applied for.*

historical, archaeological sites, palaeontological sites, or traditional use sites of a historic resource nature.	*If a historic resource impact assessment is required, briefly describe any known historical, archaeological sites, palaeontological sites, or traditional use sites of a historic resource nature. If a Historical Resources Act approval has been obtained, provide a copy of it.*

Comment

EDTI does not support the changes to the *Historical Resources Act* (HRA) requirements in the Revised Rule as it increases the regulatory burden for applicants. The Revised Rule necessitates that an HRA approval is required at the time of facility application filing, which can take upwards of eight weeks once an applicant finalizes its project footprint and submits an application. The processing time of an HRA application is not within the control of the applicant. EDTI would prefer to maintain the flexibility afforded under the existing Rule 007, to avoid potential delays in submitting a facility application for projects when HRA approval is not processed in a timely manner. EDTI believes that an applicant should continue to demonstrate that an HRA application has been submitted for projects and therefore requests no change be made to this information requirement from the existing Rule 007.

8	**TS38-39 – Participant involvement program**

Revised Rule (blackline), PDF page 111	**Existing Rule 007**
TS38) List all persons within the appropriate notification ***radius*** *as determined using Appendix A1 – Participant involvement program guidelines, as well as Indigenous groups and other interested persons that were notified or consulted as part of the participant involvement program.* ***[emphasis added]*** *TS39) Supply a list of contact information for all persons listed in TS38 in an Excel spreadsheet in accordance with the template included in Appendix A1 – Participant involvement program guidelines.*	*TS33) List all occupants, residents and landowners within the appropriate notification radius as determined using Appendix A1 – Participant involvement program guidelines, as well as Indigenous groups and other interested persons that were notified or consulted as part of the participant involvement program.* *TS34) Supply a list of contact information for all persons who had been contacted as part of the participant involvement program in a spreadsheet in accordance with the template included in Appendix A1 – Participant involvement program guidelines.*

Comment

EDTI does not support the new requirement that detailed stakeholder information for all individuals within a project notification area is provided in a facility application. As an urban service provider, project notification zones can typically include tens of thousands of addresses for new transmission line projects. For this reason, EDTI uses unaddressed neighbourhood mail as a cost-effective method to distribute project information to complete its obligation to notify potentially impacted stakeholders for a project. Canada Post only provides information on letter carrier walks and does not provide specific addresses for unaddressed neighbourhood mail. Therefore, detailed contact information of stakeholders notified for a project cannot be provided in a facility application. EDTI notes that all individuals that contact EDTI from within the notification zone are included in the stakeholder list which does include stakeholder contact information as part of its facility application.

EDTI recommends the following revised wording:

TS38) List all persons within the appropriate notification radius as determined using Appendix A1 – Participant involvement program guidelines, as well as Indigenous groups and other interested persons that were notified or consulted as part of the participant involvement program. ***Where postal code addresses have been used to satisfy the notification requirement, provide a list of letter carrier walks in lieu of a list of contact information for all persons notified as part of the participant involvement program.***   ***[emphasis added]***

9	**Section 7.2.2 – Amendment Process**

Revised Rule (blackline), PDF page 114	**Existing Rule 007**
• *A like-for-like replacement of an individual or small number of transmission structures with no change to the transmission line's approved right-of-way. A marginal increase, up to 25 per cent, from the height of the existing structure is allowable.*	• *A like-for-like transmission tower replacement with no change to the transmission line's approved right-of-way.*

Comment

In Section 7.2.2, under sub-heading No Application, EDTI supports the minor revision to the bullet referenced above and finds the revised language is helpful. EDTI recommends the additional revised wording for additional flexibility for minor alterations:

- *A like-for-like replacement of an individual or small number of transmission structures with no change to the transmission line's approved right-of-way. A marginal increase, up to 25 per cent, from the height of the existing structure****, or adjustment of final structure placement by up to 5 metres side-to-side within the right-of-way,*** *is allowable.* **[*emphasis added*]**

Section 9 (Decommission and salvage for transmission facilities)

4. With respect to the proposed changes in Section 9.1 of the Revised Rule, EDTI provides the following feedback and/or requests for clarity on the following proposed content changes.

10	**DST6-8 – Participant involvement program**

Revised Rule (blackline), PDF page 117	**Existing Rule 007**
DST6) Summarize the participant involvement information, including a description of the activities undertaken and include any engagement materials provided. (See Appendix A1 – Participant involvement program guidelines and Appendix A1-B – Participant involvement program guidelines for Indigenous groups). *DST7) List all persons within the appropriate notification* ***radius*** *as described in Appendix A1 – Participant involvement program guidelines, as well as Indigenous groups, owners of aerodromes or other interested persons that were notified or consulted as part of the participant involvement program.* ***[emphasis added]***	*DST6) Confirm that personal notification was provided to occupants, residents, landowners, Indigenous groups and other utilities on, or directly adjacent to, the project right-of-way or location.*

DST8) Supply a list of contact information for all persons listed in DST7 in an Excel spreadsheet in accordance with the template included in Appendix A1 – Participant involvement program guidelines.	

Comment

As described above in EDTI's feedback on TS38-39, EDTI has concerns about providing detailed stakeholder information for all individuals within a project notification area. As an urban service provider, our project notification zones can typically include tens of thousands of addresses for new transmission line projects. For this reason, EDTI prefers to use unaddressed neighbourhood mail as it is lower cost, easy to replicate for multiple project mailouts, and provides notification to a large area to account for route changes. As it is unaddressed neighbourhood mail, no address lists are available to be provided with our facility applications. It is therefore not currently feasible to provide contact information (i.e.: individual addresses) for all individuals within a project notification zone other than providing a list of unaddressed letter carrier walks. All individuals that contact EDTI from within the notification zone are included in our stakeholder list provided as part of the facility application.

EDTI recommends the following revised wording:

DST7) List all persons within the appropriate notification radius as described in Appendix A1 – Participant involvement program guidelines, as well as Indigenous groups, owners of aerodromes or other interested persons that were notified or consulted as part of the participant involvement program. ***Where postal code addresses have been used to satisfy the notification requirement, provide a list of letter carrier walks in lieu of a list of those persons.*** ***[emphasis added]***

11	**DST8 – Municipal consultation**

Revised Rule (blackline), PDF page 117	**Existing Rule 007**
DST8) Supply a list of contact information for all persons listed in DST7 in an Excel spreadsheet in accordance with the template included in Appendix A1 – Participant involvement program guidelines. ***Summarize consultation with local municipal jurisdictions (e.g., cities, towns, municipal districts, counties,).*** ***[emphasis added]***	N/A

Comment

The Revised Rule includes a requirement to summarize consultation with local municipal jurisdictions; however, EDTI notes that consultation is not required for facility applications of type "Decommission and salvage – transmission facilities" as per Table A1-1 in Appendix A1 (see PDF page 177 in the Revised Rule blackline). EDTI recommends the following portion of the Revised Rule be struck:

Summarize consultation with local municipal jurisdictions (e.g., cities, towns, municipal districts, counties,).

Section 16 (Glossary)

5. With respect to the proposed changes in the Glossary section of the Revised Rule, EDTI provides the following feedback and/or requests for clarity on the following terms and definitions.

12	Glossary Term: "Local authority"
Revised Rule (blackline), PDF page 164 *The municipality and other relevant municipal parties such as emergency services, infrastructure services, and planning services.*	**Existing Rule 007** N/A
Comment EDTI has concerns regarding this definition as it pertains to consultation with "other relevant municipal parties". EDTI typically engages with a primary contact at the City of Edmonton and request they then circulate project information to all required departments, as needed. EDTI recommends the following revised wording to improve clarity: *The municipality and/**or** other relevant municipal parties such as emergency services, infrastructure services, and planning services.* ***[emphasis added]***	
13	**Glossary Term: "Major substation equipment"**
Revised Rule (blackline), PDF page 164 *Includes transformers, **transmission-level** circuit breakers, capacitor banks, static VAR (volt-ampere reactive) compensators, reactors and telecommunications structures.* ***[emphasis added]***	**Existing Rule 007** *Includes transformers, circuit breakers, capacitor banks, static VAR (volt-ampere reactive) compensators, reactors and telecommunications structures.*
Comment As described above in EDTI's feedback on TS12, EDTI notes the added term "transmission-level" is new to Rule 007 and is undefined within the Rule. EDTI generally understands "transmission-level" in reference to nominal voltage levels greater than 25 kilovolts (kV) when describing major substation equipment. EDTI recommends the following revised wording to improve clarity: ***Includes telecommunications structures and the following equipment greater than 25 kilovolts (kV): transformers, circuit breakers, capacitor banks, static VAR (volt-ampere reactive) compensators, and reactors.***	

Appendix A1 and A1-B

6. EDTI provides the following feedback and/or requests for clarity on the following proposed content changes.

14	Appendix A1, Section 5 – Consultation and notification
Revised Rule (blackline), Appendix A1, PDF page 170 *The notification and consultation distances set out in Tables A1-1 and A1-2 are the minimum distances to which notification and consultation is to occur.*	**Existing Rule 007** *The Commission recommends that notification and consultation should, at a minimum, be conducted to the distances outlined in the following table.*
Comment EDTI does not support the change to this passage in the Revised Rule as it is unnecessarily prescriptive. EDTI notes that Section 1.1 of Appendix A1 (PDF page 167 in the Revised Rule) provides flexibility to deviate from the PIP guidelines, provided the applicant explains the circumstances and rationale for any such deviation. EDTI therefore requests that no change be made to this passage from	

the existing Rule 007 and that applicants continue to be allowed to exercise discretion when conducting a project PIP.	
15	**Appendix A1, Table A1-1 – New facility application type**
Revised Rule (blackline), Appendix A1, PDF page 176 *Minor substation developments within existing facilities, where there is no change in the substation fence line and no increase in operating noise – urban*	**Existing Rule 007** N/A
Comment EDTI supports the addition of this new facility application category to Table A1-1 and finds the notification and consultation requirements in the Revised Rule are reasonable. A significant portion of EDTI's transmission work involves substation development within the fenced area and inside of buildings of existing urban facilities, requiring stakeholder engagement per Rule 007 despite creating no visual or noise impacts to stakeholders. This sometimes results in excessive engagement on minor development work, leading to stakeholder fatigue for those located near EDTI's substations. EDTI has found these types of projects are routinely carried out with no stakeholder concerns.	
16	**Appendix A1-B, Section 4 – Benefits to Indigenous groups**
Revised Rule (blackline), Appendix A1-B, PDF page 191 *If an applicant would like the Commission to consider the benefits of a proposed project to an Indigenous group, the applicant should provide information clearly describing the benefits that the Indigenous group will receive and implications of not approving the project. This information should identify all Indigenous groups who may benefit from the project and should describe the nature of the expected benefits (e.g., social, environmental and economic benefits,* ***or benefits related to Section 35 rights and traditional land use such as cultural, ceremonial and spiritual benefits****). Supporting documentation such as community letters of support should be provided if available.* ***[emphasis added]***	**Existing Rule 007** N/A
Comment EDTI requests clarification as to what "…ceremonial and spiritual benefits" refers to, so that EDTI may better understand what is expected to be included in associated facility application documentation. This will help EDTI fully understand the nature and scope of such benefits in the event EDTI chooses to enter into a benefit-type arrangement with an Indigenous group on a transmission project.	

7. EDTI looks forward to further participating in any additional consultations regarding potential changes to AUC Rule 007 and to providing feedback on proposed revisions. If you have any questions or concerns regarding the comments above, please contact the undersigned.

Sincerely,

[Electronically Submitted]

Ryan McNeil
Senior Manager, Regulatory Affairs
EPCOR Distribution & Transmission Inc.
Phone: 780-412-3710