

Sturgeon County Administration appreciates the opportunity to provide feedback on the Alberta Utilities Commission's proposed amendments to *Rule 007: Facility Applications for Power Plants, Substations, Transmission Lines, Industrial System Designations, Hydro Developments and Gas Utility Pipelines*.

As a rural municipality experiencing growing interest in energy infrastructure development, we reviewed the proposed changes with particular attention to how they intersect with land use, emergency services, resident protection, and agricultural preservation. While the proposed Rule 007 amendments are an important step forward, further attention to local implications, definitions, and procedural clarity will help ensure successful implementation.

### 1. Municipal Engagement Form

The formalization of the Municipal Engagement Form in Appendix A1 provides essential structure and accountability for developers to engage municipalities early and meaningfully. We strongly support this provision and recommend it be retained and reinforced, but recommend that the AUC clarify what level of design "modification" qualifies and how this input will be considered in the AUC's decisions. (*Appendix A1 – Section 6.3, WP40-41*)

### 2. Emergency Response and Local Fire Services

Ensuring early awareness and coordination on fire suppression capabilities is critical. We recommend that local fire services be explicitly referenced in emergency response planning requirements, particularly for energy storage systems or hybrid facilities. Including this in the required consultation at the AUC stage will improve public safety and municipal readiness. Additionally, the requirement for applicants to describe emergency plans should be expanded to ensure municipalities have the opportunity to conduct a preliminary review, particularly when hazardous or high-capacity systems are proposed. (*WP13, WP14*)

### 3. Shadow Flicker and Noise Requirements

We support the inclusion of detailed shadow flicker assessment criteria and refinements to the noise impact assessment process under Rule 012. These additions improve clarity and provide better protection for residents, especially in rural areas. However, we note that Rule 012 does not currently reference low-frequency vibration, which can also affect nearby residents, livestock, and agricultural operations and this gap warrants further review to help ensure limited impacts. We recommend future consideration of this impact class as monitoring technologies and thresholds evolve. Also, we believe there would be

benefit to the AUC clarifying whether noise thresholds will apply cumulatively when multiple facilities or phases are planned adjacent to each other. *(WP15–WP18, Rule 12)*

#### 4. Land Use and Planning Alignment

The rule rightly requires proponents to confirm compliance with municipal statutory plans such as Municipal Development Plans, Intermunicipal Development Plans, Area Structure Plans, and Land Use Bylaws. However, further clarity is needed on how the AUC will interpret or weigh non-compliance. Sturgeon County requests that the AUC outline what process or consideration applies when applications do not align with local planning frameworks and whether this may affect approval decisions. *(WP19–WP20)*

#### 5. Agricultural Impact Assessments

Sturgeon County supports the requirement for agricultural impact assessments where Class 1, 2, or 3 soils are affected. As a municipality with substantial Class 1 land, the County values the inclusion of both soil quality assessments and co-location feasibility analyses to ensure that projects do not unduly impact agricultural productivity. However, we recommend that applicants be required to address not just soils, but also irrigation infrastructure, drainage patterns, and long-term land fragmentation risks. *(WP24–WP27)*

#### 6. Public Benefit Reporting

The requirement for proponents to describe public benefits is appreciated. However, further definition or criteria would improve consistency. We recommend that the AUC identify where and how these public benefits will be considered in application assessments and consider outlining examples of public benefit, such as tax base contributions, infrastructure upgrades, community benefit agreements, or long-term employment. *(WP8)*

#### 7. Clarity on “Proximity” and Notification Radius

Further clarification is needed on how “proximity” is defined within Rule 007, particularly regarding triggers for shadow flicker, noise, and consultation thresholds. Numerical standards (such as 1,500 metres for wind turbine receptors) should be clearly and consistently applied across all relevant sections to support predictable, enforceable review. *(Intro – Section 2.3)*

#### 8. Coordination Across Jurisdictions

We encourage the AUC to continue working toward streamlining application processes where multiple agency reviews are involved. Where projects require parallel reviews by Alberta Environment and Protected Areas or federal regulators, mechanisms to avoid

duplication (particularly for environmental and consultation assessments) would improve efficiency and reduce unnecessary administrative burden. For example, coordination on wildlife impact data (e.g., Alberta Environment and Protected Areas – Fish and Wildlife Stewardship reports) should also be clearly referenced to ensure consistent reference values across jurisdictions. (*WP21–WP23*)

#### 9. Stakeholder Concern Resolution

Clarification on how the AUC will determine whether a stakeholder concern is considered “resolved” would be appreciated. The current phrasing could allow a single unresolved objection to indefinitely delay a project. Clear direction is needed on what constitutes a good faith effort by applicants, and whether mitigation or engagement responses (without full agreement) may satisfy regulatory expectations. (*WP 44*)

#### 10. Additional Clarifications

Sturgeon County Administration also seeks further clarity and inclusion on the following technical points:

- How stakeholder contact information within consultation radius is obtained and how privacy protections will be ensured.
- How the Commission will assess applications involving multi-phase or co-located developments, such as energy generation paired with data centres or industrial processing.
- Whether alternative fuels (e.g., hydrogen-fueled standby generators) require separate assessment thresholds or review procedures under the revised Rule 007.

The proposed changes to Rule 007 represent a significant opportunity to strengthen alignment between provincial approvals and local land use, safety, and service planning considerations. The Sturgeon County Administration appreciates the opportunity to contribute our municipal perspective and encourage the AUC to continue building clarity and consistency in how infrastructure development interfaces with rural communities.

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