

To whom it may concern:

The Utilities Consumer Advocate (UCA) appreciates the opportunity to submit feedback on the proposed amendments to Rule 007, with a focus on affordability and the potential impacts on consumers.

First, several of the proposed changes—such as the introduction of checklist applications for 1–10 MW projects and the clarified exemptions for micro-generation and small-scale power plants—are positive steps toward reducing regulatory burden and supporting affordability. These measures may help streamline approvals, reduce compliance costs, and encourage distributed generation, which benefits consumers.

However, the UCA has concerns that other aspects of the proposed changes may increase administrative complexity and financial burden, particularly for renewable energy developers. For example, the requirement to submit separate application forms for individual facilities (Section 2.2), combined with extensive documentation requirements, may significantly increase the cost and time required to complete applications. This may be especially challenging for projects involving multiple facilities.

While the UCA recognizes that many of the proposals for renewable energy projects endeavour to align with recent legislative changes, we remain concerned that the application and approval process —particularly for wind and solar, appear to be subjected to a more extensive and detailed set of requirements than thermal power plants. These requirements include:

- **Reclamation security:** Renewable projects must submit third-party cost estimates and detailed financial assurance plans (Sections WP29–WP30, SP28–SP29), whereas similar requirements for thermal plants are less prescriptive.
- **Environmental and visual impact assessments:** Renewable projects face comprehensive assessment obligations, including visual simulations, shadow flicker and glare modeling, and agricultural impact assessments (Sections WP21–WP23, SP19–SP21), which are not required to the same degree for thermal facilities.
- **Municipal engagement:** Renewable developers must submit municipal engagement forms and demonstrate alignment with local planning documents (e.g., WP19, SP17), in a more stringent manner than what appears to be required for thermal projects.

These requirements may inadvertently discourage investment in renewable energy. This is of particular concern for the UCA, given that renewable generation has generally been shown to contribute to lower wholesale electricity prices.

In light of the above, the UCA encourages the Commission to consider whether there may be an alternative approach to the proposed changes to Rule 007 that would ensure the application and approval process for power plants promotes an environment of technological neutrality and overall regulatory fairness.

Finally, the UCA wishes to thank the Commission for taking the time to consider the UCA's feedback regarding the proposed changes to Rule 007.

Office of the Utilities Consumer Advocate