



May 22, 2025

Alberta Utilities Commission

1400,600 3rd Avenue SW

Calgary, AB T2P 0G5

By email to: engage@auc.ab.ca

FEEDBACK ON AUC RULE 007

Thank you for the opportunity to provide input on the proposed changes to Rule 007. WSP has not taken a position on what level of information the AUC deems necessary to make a public interest decision; the comments in the table below are mainly intended to provide clarity on the application content and process.

AUC Rule 007 Blackline_20250324 - WSP Clarification Requests

Rule 007 Section #	PDF page	Current or Proposed Rule 007 Text	Suggested Revision or Clarification
4.3.1	15	An applicant must submit a final project update to the Commission at least 90 days before the start of construction, in accordance with the requirements set out in subsection 4.3.3	Can a rationale for the 90-day period be provided? This is longer than the performance standard in Table 3.1 for processing a Category 2 application, and in many cases the detailed engineering process may be ongoing until less than 90 days prior to construction start. If updated, please make consistent throughout other relevant sections of Rule 007.
WP1	16	The maximum hub height and maximum rotor-swept area in the application must not exceed what was assessed in the AEPA-FWS renewable energy referral report.	Would the AUC consider the cumulative rotor-swept area (e.g., if the design is changed to use fewer, larger turbines) in addition to the rotor-swept area of individual turbines? Would the cumulative rotor swept area be considered for Final Project Update requirements (Table 4.2) as well?

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WP5	16	Provide the legal description of the proposed power plant site	Provide the legal description of the proposed power plant project boundary [consistency edit]. Make consistent throughout other relevant sections of Rule 007.
WP7	17	Provide the requested approval date from the Commission, the expected construction start date, the expected in-service date of the project and the requested construction completion date to be used in the project approval. Provide the rationale for these dates.	Suggest adding Glossary definitions for "in-service date" and "construction completion" date for clarity, to assist with provision of rationale for these.
WP21 (formerly WP15)	20	If a federal impact assessment or a provincial impact assessment report was not required, submit an environmental evaluation of the project	Land-based wind (and solar, etc.) projects are neither mandatory nor exempted activities from the federal IAA and provincial EIA requirements. However, to date no wind projects in Alberta have required a federal or provincial impact assessment. However it is not clear if a formal determination from the relevant agencies needs to be provided. Suggest including similar language for feedback or justification requirements under WP36.
WP33 (formerly WP21)	27	Identify any other acts (e.g., Environmental Protection and Enhancement Act, Water Act, Public Lands Act, Highway Development and Protection Act and Wildlife Act) that may apply to the project...	Is this section only meant to refer to provincial acts, or should relevant federal acts be included here as well? If updated, please make consistent in other relevant sections of Rule 007.

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WP35 (formerly WP23)	27	Provide the Historical Resources Act approval . If a historic resource impact assessment is required, briefly describe any known historical or archaeological sites, palaeontological sites, or traditional use sites of a historic resource nature.	The revised wording now implies that HRA approval needs to be in place prior to submitting the AUC application. This is inconsistent with other regulatory requirements listed in WP33 that only requires identification of the other relevant acts/approvals, and the status. Suggest moving Historical Resources Act requirements under WP33. If updated, please make consistent in other relevant sections of Rule 007.
p. 22 text box	28	An applicant is responsible for fulfilling the requirements of all other agencies with jurisdiction over a project. For example, both Transport Canada and NAV CANADA have separate requirements.	Suggest making consistent with text box wording for Solar Projects on p. 42: An applicant is responsible for fulfilling the requirements of all other agencies with jurisdiction over a project. For example: <ul style="list-style-type: none"> • Transport Canada requires that an aeronautical assessment form for obstruction evaluation and a final drawing of the solar panel layout be submitted at least 90 days before the start of construction. • NAV CANADA requires that a land use proposal submission form be submitted before project construction. This should also be included in the relevant sections for other types of facilities that will require these forms (e.g., thermal power plants due to stack heights).
WP38 (formerly WP26)	28	Table 4.1 Notification radius for wind projects	Suggest including consultation radii as well, for consistency with Appendix A-1. Also see Table 4.11 on p. 84 (PDF Page 90) for hydro projects, which includes a column for Personal Consultation. Make consistent throughout other relevant sections of Rule 007.

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TP8	56	For power plants with natural gas piping located within the power plant site project boundary, provide the following information...	Why specific to natural gas and not other potential thermal fuel sources (e.g., hydrogen, biogas, syngas, etc.). Also notable that biomass is currently an example of Other Power Plants in Section 4.6, but would those be considered thermal?
Table 4.12	93	Confirm that air emissions associated with the updated project do not exceed those specified in the original application.	Notable that air emissions are mentioned in the Final Project Update for Hydroelectric Power Plants; however the Environmental information section does not include a requirement to submit an emissions modelling report (similar to TP22 for thermal plants)
Section 6	99	Discontinuing the operation of a power plant is referred to as decommission in this section. Dismantling or removing any works or installations forming part of a power plant is referred to as salvaging.	This is confusing as it is not consistent with the definition of Decommission in the Glossary. Salvage is also not included in the glossary. Also section 7.2 uses the terms "discontinue, dismantle or remove" related to transmission facilities. Please update for consistency?
Section 10 text box on p. 113	119	Merchant - Private ownership with full market participation.	Please clarify distinction between Merchant and "Market Participant" (as used in Sections 7.1.1 and 7.2. Suggest adding to Glossary?
Appendix A-1 Table A1-1	171	Personal notification vs. personal consultation	Suggest providing definitions to make the distinction clearer.
Appendix A-1 Section 6	179	The applicant must allow notified stakeholders and Indigenous groups a minimum of 14 calendar days to receive, consider and respond to the PIP for the proposed project before filing a facility application.	Suggest clarifying that the "PIP" in this context refers to what is described in Section 4 Information to be Provided (PDF Page 168-170), and does not require that a copy of the PIP summary report (Appendix A-1, Section 9, PDF Page 182-183) be provided to participants in advance of the application being filed.

CLOSURE

We trust that the above meets your present requirements. Should you have any questions or require additional details, please contact the undersigned.

WSP Canada Inc.

Trevor Cuthbert, MSc, PMP
Senior Principal, Regulatory & Impact Specialist