

Bulletin 2025-17

December 18, 2025

End of suspension and changes to post-construction mortality monitoring requirements at solar power plants

As part of the approval process for solar power plants, approval holders are required to conduct at least three years of post-construction mortality surveys, in accordance with the *Wildlife Directive for Alberta Solar Energy Projects* and the *Post-Construction Survey Protocols for Wind and Solar Energy Projects*. This is supported by Alberta Utilities Commission's (AUC) [Rule 33: Post-approval Monitoring Requirements for Wind and Solar Power Plants](#).

On December 3, 2024, the AUC released [Bulletin 2024-24: Suspension of post-construction monitoring requirements at applicable solar power plants for the 2025 season](#), which implemented a one-year suspension of post-construction mortality surveys for operational solar power plants that are not located within 1,000 metres of a named lake or a wetland-based Important Bird Area during the 2025 survey season (effective from January 1, 2025, to December 31, 2025). During this suspension, Alberta Environment and Protected Areas (AEPA) conducted a review and analysis of the existing province-wide post-construction wildlife mortality data and assessed the risk to wildlife from solar power plants.

On December 18, 2025, AEPA released the [Addenda to the Wildlife Directive for Alberta Solar Energy Projects and Post-Construction Survey Protocols for Wind and Solar Energy Projects](#). This addendum details that previously collected monitoring data was sufficient to determine that wildlife mortality was relatively low at solar power plants located on cultivated land, existing disturbance, and tame pasture, but data was not sufficient to extrapolate these findings to areas where mortality data from solar power plants is unavailable.

Based on these findings, AEPA will now require post-construction mortality monitoring at solar power plants:

- a) for a minimum of one year, if more than 70% of the buffered solar energy project footprint (defined as the footprint plus one kilometre buffer) occurs on cultivated land or existing disturbance or tame pasture and is located within the following Natural Subregions: Dry Mixedgrass, Mixedgrass, Northern Fescue, Foothills Fescue, Foothills Parkland or Central Parkland; or
- b) for a minimum of three years, if less than 70% of the buffered solar energy project footprint (defined as the footprint plus 1 km buffer) occurs on cultivated land or existing disturbance or tame pasture, or if the solar power plant is within the Foothills, Boreal Forest, Rocky Mountains, or Canadian Shield Natural Regions or the Peace River Parkland Natural Subregion.

Conclusion

The AUC accepts AEPA's recommendations for alterations to post-construction mortality monitoring protocols. This is consistent with the AUC's practice of regularly assessing its regulations, rules and processes to identify innovative and efficient regulatory solutions for Alberta.

With the release of the *Addenda to the Wildlife Directive for Alberta Solar Energy Projects and Post-Construction Survey Protocols for Wind and Solar Energy Projects*, the AUC ends the one-year suspension of post-construction mortality surveys at solar power plants that are not located within 1,000 metres of a named lake or a wetland-based Important Bird Area for the 2025 survey season.

All solar power plants that are not located within 1,000 metres of a named lake or a wetland-based Important Bird Area with directions for post-construction mortality monitoring, in the Dry Mixedgrass, Mixedgrass, Northern Fescue, Foothills Fescue, Foothills Parkland, or Central Parkland Natural Subregions that have fulfilled at least one year of post-construction mortality monitoring that was acceptable to AEPA, can consider directions for post-construction mortality monitoring have been met. The AUC will rescind outstanding directions for mortality monitoring in the eFiling system.

All solar power plants that are not located within 1,000 metres of a named lake or a wetland-based Important Bird Area with directions for post-construction mortality monitoring, in the Dry Mixedgrass, Mixedgrass, Northern Fescue, Foothills Fescue, Foothills Parkland, or Central Parkland Natural Subregions that have not fulfilled at least one year of post-construction mortality monitoring that was acceptable to AEPA, must complete one year of post-construction mortality monitoring using methods acceptable to AEPA.

All solar power plants that are located within 1,000 metres of a named lake or a wetland-based Important Bird Area with directions for post-construction mortality monitoring, in the Dry Mixedgrass, Mixedgrass, Northern Fescue, Foothills Fescue, Foothills Parkland, or Central Parkland Natural Subregions must complete post-construction mortality monitoring for a minimum of three years.

All solar power plants outside of the Dry Mixedgrass, Mixedgrass, Northern Fescue, Foothills Fescue, Foothills Parkland, or Central Parkland Natural Subregions, should conduct post-construction mortality monitoring in accordance with the directions outlined in their approvals.

For clarity, the Commission will issue letters on the record of all proceedings affected by the above changes.

Submission of annual mortality monitoring reports and all related correspondence from AEPA to the AUC is required under Rule 033. The Commission expects applicable projects to submit the required annual post-construction monitoring survey reports to AEPA no later than January 31 of the year following the mortality monitoring period and submit the post-construction monitoring survey report and AEPAs' post-construction monitoring response letter to the Commission no

later than March 31 of the year following the mortality monitoring period. These reports and response letters shall be subsequently filed on or before the same date every subsequent year for which surveys are required.

Additionally, the AUC has requested that the AEPA include recommendations in referral reports for whether a solar power project should have one or three years of post-construction mortality monitoring based on its assessment of habitat in the project area, the habitat surrounding a project (i.e., the one kilometre buffer), and review of the methods used for determining this habitat.

Specific inquiries about the end of the suspension can be directed to Senior Science Analyst, Glenn Harasym, at glenn.harasym@auc.ab.ca.

General stakeholder questions can be directed to info@auc.ab.ca.

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