



ALBERTA UTILITIES COMMISSION

POWER PLANT, ENERGY STORAGE FACILITY, SUBSTATION, AND INTERCONNECTION APPLICATION
(AUC RULE 007)

FOR THE PROPOSED

SOUNDING CREEK SOLAR ENERGY PARK

Submitted by:

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September 2025

Overview

Sounding Creek Solar Energy Park GP Ltd. (the “Proponent”) proposes to permit, construct and operate Sounding Creek Solar Energy Park (the Project).

Sounding Creek Solar Energy Park GP Ltd. (the Proponent), wholly owned by EDP Renewables Canada Ltd. (EDPR Canada), proposes to construct and operate a 200-megawatt (MW) solar facility and a Battery Energy Storage System (BESS) of 50 MW/200 MWh, called the Sounding Creek Solar Energy Park that will be situated on approximately 2,284 acres of private land within Special Areas no. 4 in Alberta, approximately 7 kilometres (“km”) north of the community of Sedalia. The Project is 100 percent owned by the Proponent.

The proponent also proposes to develop, construct and operate the Project substation (“Substation”) to connect the project to the Alberta Interconnected Electric System through the existing 240 kilovolts (“kV”) transmission line (9LA46). ATCO is the transmission facility owner. All transmission infrastructure required for the Project will be planned and submitted by ATCO.

The applicant is a qualified owner and a registered company in the province of Alberta. Sounding Creek Solar Energy Park GP Ltd. is an Alberta Incorporated Company, and a direct subsidiary of EDP Renewables Canada Ltd., which developed, constructed, and operates the Sharp Hills Wind Farm in Alberta through another subsidiary.

The Project will have a total generating capacity of 250 MWac. Electricity generated by the Project will be gathered by the underground and overhead collector system and routed to the project collector Substation. The Project Substation will be located on quarter section SE 28-32-5-W4M. In addition, the Project will include solar modules, BESS enclosures, racking, inverters, collection lines, access roads, and other standard solar energy infrastructure, including a temporary laydown yard and an Operations & Maintenance (O&M) building. There will be a Battery Energy Storage System of 50 MW with storage capacity of 200 MWh in the solar energy park. The BESS will be located on quarter section SE 28- 32- 5- W4M, beside the proposed substation.

The Proponent is seeking approval to construct and operate the power plant, energy storage facility, and a permit and licence to construct and operate the Project substation, pursuant to Alberta Utilities Commission (AUC) Rule 007: *Applications for Power Plants, Substations, Transmission Lines, Industrial System Designations, Hydro Developments and Gas Utility Pipelines (Rule 007)* and a connection order.⁸⁶

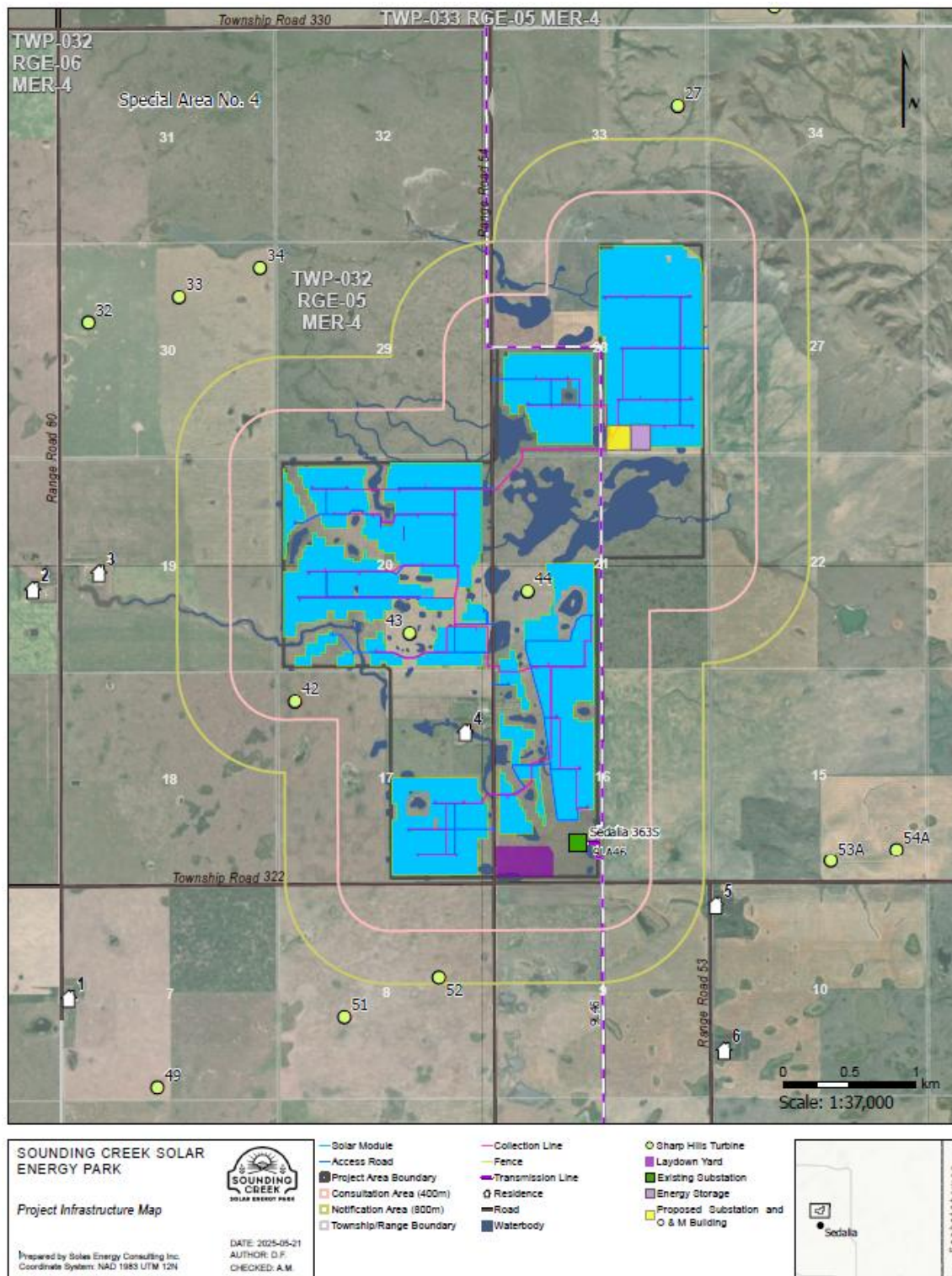


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List of Acronyms

Abbreviation	Term
ACO	Aboriginal Consultation Office
AEPA	Alberta Environment and Protected Areas
AEPA-WM	Alberta Environment and Protected Areas – Wildlife Management
AESO	Alberta Electric System Operator
AUC	Alberta Utilities Commission
BESS	Battery Energy Storage System
BREC	Biological, Radiological, Explosive, Chemical
ERP	Emergency Response Plan
HRA	Historical Resources Act
HRIA	Historical Resources Impact Assessment
ISO	Independent System Operator
kV	kilovolt
LAIRT	Landscape Analysis Indigenous Relations Tool
LSRS	Land Suitability Rating System
m	metres
MVA	Megavolt ampere
MW	Megawatt
MWh	Megawatt hour
NIA	Noise Impact Assessment
PEC	Primary Emergency Coordinator
PIP	Participant Involvement Program
PSIP	Project Specific Information Package
REO	Renewable Energy Operations
SEC	Secondary Emergency Coordinator
SP	Solar Power Information Request
TFO	Transmission Facility Owner
WEST	Western EcoSystems Technology ULC

Power Plant Application Information

SP1 ,ES1, ES2 & TS1

State the approvals that are being applied for from the AUC and describe the power plant, energy storage facility and collector system including:

- Number of solar photovoltaic panels.
- Total capability of the power plant in megawatts (MW).

Make, model and the nominal capability of each solar-powered generator in MW. If the vendors have not been selected or the equipment has not been finalized, provide the anticipated type and number of solar modules, the physical dimensions of the solar array and the type of solar tracking system, if applicable.

Provide the total capability of the energy storage facility in megawatts (MW) and storage capacity in megawatt hour (MWh) of the project.

The Proponent hereby applies for a power plant approval, energy storage facility approval, substation permit and license, and interconnection for the Sounding Creek Solar Energy Park (the “Project”).

The Project will consist of approximately 511,472 solar photovoltaic modules. The racking will have a height of 1.5 m above ground and will use single axis tracking technology. The Sounding Creek Solar Energy Park’s solar infrastructure will have a total generating capacity of 200 MW (AC). The Proponent has initially chosen the make and model of the modules for the Project, which may change depending on the availability of this specific model. Information about the PV modules is given in the following table:

Table 1: Summary of Sounding Creek Solar Energy Park modules

Item	Details
Make	Longi
Model	LR5-72HBD-550M
Nominal Capability of each	550 W
Module Size	88.8 x 44.6 inches
Number of Solar Modules	511,472 modules
Total Capability	200 MW ac
Tracking System	Single Axis Tracking

For the Battery Energy Storage System, the total capability of the energy storage facility will be 50 MW, and the storage capacity will be 200 MWh.

SP2 , ES7 & TS4

Provide a list of existing approvals for facilities directly affected by this project, if any.

There are no known approvals for facilities directly affected by this Project.

SP3 , ES8 & TS3

Provide details of the project ownership structure, including the names of all companies having an ownership interest in the project and their ownership share, and if applicable, the name of the project operator. Confirm that the applicant is a qualified owner.

The Project will be 100% owned and operated by Sounding Creek Solar Energy Park GP Ltd on behalf of Sounding Creek Solar Energy Park Limited Partnership.

The applicant is a qualified owner of a power plant. Sounding Creek Solar Energy Park GP Ltd. is incorporated in Alberta.

SP4 & ES9

For a municipality or a subsidiary of a municipality to hold an interest in a generating unit, documentation confirming compliance with Section 95 of the Electric Utilities Act is required.

This is not applicable, as the Project will be wholly owned and operated by the Proponent. The Proponent is an independent entity and is neither a subsidiary nor partially owned by the municipality.

SP5 & ES10

Describe the location of the project:

- **Provide the legal description of the proposed power plant site (legal subdivision [LSD], section, township, range, meridian and/or plan, block, lot, municipal address for urban parcels) and connection point, if applicable.**
- **Provide a Keyhole Markup Language (.kml/.kmz) file that contains the geographic data of each of the major components, including substation locations and project boundary of the proposed power plant. This file should reflect the information shown on the drawings and maps submitted to address information requirement**

The Project site is located within the lands identified in the table below.

Table 2: List of Legal Land Descriptions

Quarter Sections	Section	Township	Range	Meridian
NW, SW	16	32	5	4
NE, SE	17	32	5	4
NW, NE, SE, SW	20	32	5	4
NE, NW, SW	21	32	5	4
NE, SE, SW	28	32	5	4

The connection point is located at SE 28-32-5-W4M.

A keyhole markup language file is provided in **Attachment 1 – Sounding Creek Solar Energy Park KMZ**.

SP6 & ES11

Provide the following drawings and maps with units of measure/scale and the direction of north specified:

A legible plant site drawing showing the solar array, collector substations, collector lines and access roads and the power plant site boundary.

Legible maps showing:

- **The power plant site boundary.**
- **Land ownership of surrounding lands, including any residences and dwellings within the notification radius described in Appendix A1 – Participant involvement program guidelines, Table A1-1: Electric facility application notification and consultation requirements.**
 - **Neighbouring municipalities, First Nation reserves, Metis Settlements, including nearby roads, water bodies and other landmarks that may help identify the general location of the project area. This map may be at a larger scale than the detailed maps provided in response to other information requirements.**
- **All registered aerodromes and any known unregistered aerodromes within 4,000 metres of the edge of the proposed power plant site boundary.**
- **Important environmental features and sensitive areas in the local study area.**
 - **Any additional energy-related facilities within the project area.**
- **The proposed collector line route or routes, and major land use and resource features (e.g., vegetation, topography, existing land use, existing rights-of-way). This information should also be provided in air photo mosaics.**

Details have been included in **Attachment 2 - Maps & Figures**.

SP7, ES12 & TS19

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.

The Project's expected schedule is as follows:

- **March 2024– Renewable Energy Project Submission Submitted to Alberta Environment and Protected Areas**
- **June 2024 – Stakeholder Consultation started**
- **October 2024- Open House**
- **September 2025- Submission of AUC application**
 - **Q1 2026- Anticipated AUC approval**
 - **Q2 2026- Anticipated SAB Development Permit Application**
- **Q2 2027- Construction commencement**
- **Q2 2028 – In-service date**
- **Q4 2028- Commercial Operation Date (COD)**

The Proponent is requesting the above approval date to ensure timing with the AESO interconnection process. However, this schedule is slightly different than the schedule previously communicated with

stakeholders, which was based on an anticipated AUC application submission in Q4 2024. Delay in the AUC application submission is primarily caused by the longer consultation period and a longer time to develop the emergency response plan (ERP) for the Project. Inclusion of BESS in the Project added complexities in developing the ERP.

To maintain transparency, the Proponent is preparing an additional consultation package that will communicate the updated schedule to the stakeholders. The Proponent will share the materials and summary of this engagement with the AUC.

SP8 & ES13

If a connection order is not concurrently being applied for, provide the expected date when the connection order application will be submitted.

The Project's connection order application is being concurrently applied for. Please see *Interconnection Application Information*.

SP9 & ES14

Provide the asset identification code assigned by the independent system operator (ISO) and the ISO Project ID number related to your system access service request.

The Asset Identification Code has not been assigned by the AESO at this time.

The AESO Project ID Number is P2707.

SP10 & ES15

If the power plant & energy storage facility are to be connected to the transmission system, provide a map with one or more conceptual layouts showing possible routes and general land locations for facilities that would be used to interconnect the power plant and energy storage facility to the Alberta Interconnected Electric System.

Layouts showing possible routes and general land locations for facilities that could be used to interconnect the Project to the Alberta Interconnected Electric System will be provided through the relevant facilities application by the Transmission Facility Owner.

Regional maps are shown in **Attachment 2 - Maps & Figures**.

If the power plant & energy storage facility is to be connected to the distribution system, provide a statement from the distribution facility owner indicating that it is willing to connect the generating facilities.

Not applicable.

SP11 & ES16

Confirm the applicant has or will have a corporate or site-specific emergency response plan for the construction and operation of the proposed power plant. If the applicant will have a corporate emergency response plan, please explain why it decided not to develop a site-specific emergency response plan.

The Proponent will have an integrated site-specific emergency response plan for the construction and operation of the Project.

The draft solar emergency response plan and BESS emergency response plan are provided in **Attachment 3 - Emergency Response Plan**.

SP12 & ES17

Provide a summary of the following:

- **Site-specific risks (construction phase and operations phase) that have been identified to date.**
- **The emergency mitigation measures that have been identified.**
- **The site monitoring and communication protocols that will be put into place.**

The site-specific risks that have been identified to date, along with their draft emergency mitigation measures, are summarized in the table below.

Table 3: Site Specific Risks and Draft Mitigation Measures

Site	Risk	Draft Mitigation Measures
General	Electrocution/ Arc Flash	• Completed System Isolation and Shutdown (Implement rapid de-energization procedures.) • Complete Hazard Confinement • Notify Primary/Secondary Emergency Coordinator (PEC/SEC) with details. • Coordinator contacts emergency services and alerts site personnel. • Assign employee to meet responders. • Document incident.
General	Vehicle Incident	• Notify PEC/SEC with details. • Coordinator calls emergency services and alerts site personnel. • Assign employee to meet responders. • Complete incident and investigation forms.
General	Tornado or Severe Thunderstorm Procedure	• Monitor weather alerts; evacuate or shelter immediately when warnings issued. • If indoors: Go to designated shelter (lowest level, interior room, away from windows). • If outdoors/in vehicle: Seek shelter; if none, lie flat in low ground. • After tornado: aid injured, avoid hazards (power lines, gas, debris), await instructions, document incident.

Site	Risk	Draft Mitigation Measures
General	Blizzard	• Evacuate site before storm if possible. • If indoors: Stay inside, conserve heat, wear layers, await instructions. • If outdoors/in vehicle: Seek shelter, notify others of location, run engine intermittently with tailpipe clear, stay visible, hydrated, and warm. • Document incident.
General	Earthquake	• During earthquake: Take cover under sturdy furniture, away from windows/heavy objects. • In vehicle: Stop safely, stay inside until shaking stops. • After earthquake: Evacuate to assembly area, expect aftershocks, avoid hazards (gas leaks, power lines, damaged buildings). • Document incident.
General	Flooding	• Monitor broadcasts, evacuate if ordered. • Turn off utilities if time permits. • Never drive/walk through floodwaters. • After flood: avoid contaminated water and damaged structures, follow authority guidance, disinfect affected areas. • Document incident.
General	Lightning	• Report lightning sightings; evacuate/stand down when alarms issued. • No work in arrays until all-clear given. • Document incident.
General	Criminal Activity/Hostile Intruder	• Call 911, report detailed description (person, activity, vehicle). • Do not approach suspect. Stay on phone with dispatcher. • Document incident.

Site	Risk	Draft Mitigation Measures
General	Biological, Radiological, Explosive, Chemical (BREC) Threat	• Telephone/written threat: Remain calm, record details, notify supervisor/911, preserve evidence, don't spread rumors. • Suspicious package: Notify RCMP, don't handle, isolate area, wash hands, list contacts, evacuate. • Hazardous spill: If safe, report to Alberta gov't spill line, contain, if possible, notify supervisor, contact contractor if large. • Document incident.
General	Medical Emergencies	• Notify PEC; call 911. • Coordinate rendezvous with responders. • Provide first aid/CPR if trained. • For hazardous exposure: follow SDS and use PPE. • Document incident.
General	Fire	• Warn employees, activate alarm, evacuate. • Call 911, provide details, remain on line. • Do not open hot doors. • Take visitor log, close doors, use stairs. • Assemble at designated area, notify fire dept. if someone trapped. • Notify: ○ Firefighters if you suspect someone may be trapped inside the building. ○ Immediate supervisor, RCMP, and other emergency services, if needed. ○ Neighbours, using neighbour list
General	Grass, Brush Fires	• Notify SSC with location/size; SSC contacts 911. • Evacuate downwind areas. • Employees must not attempt suppression; guide responders.
General	Substation and Electrical Facilities Fire	• Shut down substation, open breakers. • Notify SSC/911, guide responders. • Notify TFO to de-energize incoming power. • Establish exclusion zone due to explosion hazard. • Document incident.

Site	Risk	Draft Mitigation Measures
BESS	Thermal Runaway and Fire Hazards	- Do not attempt suppression; stay >100 ft away. - Fire Dept. to coordinate with BESS SME/ROC; responders must not operate equipment. - Establish exclusion zone; expand if needed. - Monitor air quality, alarms, and adjacent equipment. - Exposure protection: from outside exclusion zone, cool equipment with fog spray (no direct streams).
BESS	Explosion/Deflagration Hazard	Maintain an exclusion zone from the trouble equipment for the duration of the thermal runaway incident.
BESS	BESS Chemical Hazards	- Wear full PPE (NFPA 1971 gear, SCBA). - Treat chemicals as dermal/respiratory hazards.

The site will part of the Proponent's Report Operations Control Centre (ROCC) in Houston, Texas. The ROCC operates 24/7, 365 days a year, ensuring continuous monitoring and support. In the event the primary control center becomes inoperable, the Proponent has a fully functional backup control center to maintain operational continuity.

The ROCC maintains an up-to-date contact list of all site personnel, emergency services, and Generation and Transmission providers to ensure rapid communication during any incident.

The ROCC continuously monitors the status of all generating units and substation devices. In emergency situations, operators have the capability to remotely control substation equipment to place the plant in a safe and secure condition.

SP13 & ES18

Confirm that local responders and authorities have been contacted or notified regarding the project emergency response plan. Describe any requirements or feedback received and describe how the applicant intends to address the requirements and feedback received.

The draft ERP was shared with local authorities, including Rob Palmer, the Regional Fire Chief at Special Areas Board, on July 3, 2025, and revised based on his comments. The Proponent also hosted two BESS Safety Information Sessions for First Responders from the Special Areas Board and Cypress County on June 16th and 17th in Jenner, and Youngstown respectively. The Proponent will continue to engage with Special Areas Board and the local responders as the Project progresses throughout the development, construction, and operation of the project life.

SP14

Submit a solar glare assessment report that predicts the solar glare at receptors within 800 metres from the boundary of the project and registered aerodromes and known unregistered aerodromes within 4,000 metres from the boundary of the project where the potential for glare is possible. The assessment report must: Describe the time, location, duration and intensity of solar glare predicted to be caused by the project.

- Describe the time, location, duration and intensity of solar glare predicted to be caused by the project.
- Describe the software or tools used in the assessment, the assumptions and the input parameters (equipment-specific and environmental) utilized.
- Describe the qualification of the individual(s) performing the assessment.
- Identify the potential solar glare at critical points along highways, major roadways and railways.
- Identify the potential solar glare at any registered and known unregistered aerodromes within 4,000 metres from the boundary of the project, including the potential effect on runways, flightpaths and air traffic control towers.
- Include a map (or maps) identifying the solar glare receptors, critical points along highways, major roadways and railways and aerodromes that were assessed.
- Include a table that provides the expected intensity of the solar glare (e.g., green, yellow or red) and the expected duration of solar glare at each identified receptor, critical points along highways, major roadways and railways and any registered and known unregistered aerodromes.

Details have been included in **Attachment 4 – Solar Glare Assessment**.

SP15 & ES20

If preparation of either a federal impact assessment or a provincial environmental impact assessment report was required, provide a copy as an appendix to the application and a separate environmental evaluation is not required. If a federal impact assessment or a provincial impact assessment report was not required, submit an environmental evaluation of the project. The environmental evaluation must:

- Describe the present (pre-project) environmental and land use conditions in the local study area.
- Identify and describe the project activities and infrastructure that may adversely affect the environment.
- Identify the specific ecosystem components (i.e., terrain and soils, surface water bodies and hydrology, groundwater, wetlands, vegetation species and communities, wildlife species and habitat, aquatic species and habitat, air quality and environmentally sensitive areas) within the local study area that may be adversely affected by the project.
- Describe any potential adverse effects of the project on the ecosystem components during the life of the project.

- Describe the methodology used to identify, evaluate and rate the adverse environmental effects and determine their significance, along with an explanation of the scientific rationale for choosing this methodology.
- Describe the mitigation measures the applicant proposes to implement during the life of the project to reduce the potential adverse effects.
- Describe the predicted residual adverse effects of the project and their significance after implementation of the proposed mitigation.
- Describe any monitoring activities the applicant proposes to implement during the life of the project to verify the effectiveness of the proposed mitigation.
- List the qualifications of the individual or individuals who conducted or oversaw the environmental evaluation.

Western EcoSystems Technology, ULC (WEST) completed an environmental evaluation and environmental supporting documentation for the Project. Details have been included in **Attachment 5 – Environmental Evaluation & AEPA Submission Report**.

The Proponent retained RWDI to conduct an air emission study for the BESS portion of the Project. The air emission study is in progress, and it will be shared as Attachment 18 once complete.

SP16, ES21 & TS25

For projects wholly or partially located on federal lands (First Nation reserves, national parks or military bases), provide a copy of the environmental impact analysis completed for the corresponding federal government department. Indicate whether the project has the potential to cause effects that may cross into another jurisdiction. Environmental effects that originate on federal lands, but cross into another jurisdiction, must be addressed as part of the environmental review process. Projects on federal lands may be subject to provincial laws, standards and permits. The applicant must address how it has considered AUC Rule 007, Rule 012 and Rule 033 and describe the steps taken, if any, to address specific requirements set out in these rules.

The Project is not located on any federal lands; therefore, this section does not apply.

SP17, ES22 & TS26

Submit a stand-alone, project-specific environmental protection plan (or environmental management plan) that itemizes and summarizes all of the mitigation measures and monitoring activities that the applicant is committed to implementing during construction and operation to minimize any adverse effects of the project on the environment.

WEST completed a stand-alone, project-specific Environmental Protection Plan for the Project Details and have been included in **Attachment 6 – Environmental Protection Plan**.

SP18

Submit a copy of the initial renewable energy operations conservation and reclamation plan (REO C&R Plan) as set out in the *Conservation and Reclamation Directive for Renewable Energy Operations*.

A Conservation and Reclamation Plan for the project has been completed by WEST in accordance with the Conservation and Reclamation Directive for Renewable Energy Operations. The plan is provided in **Attachment 7 – Conservation & Reclamation Plan**.

SP19 & ES23

Provide an overview of how the operator will ensure sufficient funds are available at the end of life of the project to cover the cost of decommissioning and reclamation.

The lands for the project are leased from private landowners, and the lease agreements include specific reclamation requirements.

The salvage value of the project equipment (Solar, BESS and Substation) is expected to offset a substantial portion of the decommissioning and reclamation costs. The Proponent is committed to ensuring that decommissioning is completed, and the site is fully reclaimed in accordance with regulatory and lease obligations.

SP20, ES24 & TS28

Provide a noise impact assessment in accordance with Rule 012.

RWDI completed the noise impact assessment and has been included in **Attachment 8 – Noise Impact Assessment**.

SP21, ES25 & TS29

Identify any other acts (e.g. Environmental Protection and Enhancement Act, Water Act, Public Lands Act and Wildlife Act) that may apply to the project, identify approvals the project may require, and provide the status of each of these approvals.

The following provincial and federal statutes may affect the Project:

- *Agricultural Pests Act*, R.S.A. 2000, c. A-8;
- *Alberta Land Stewardship Act*, S.A. 2009, cA-26-88;
- *Alberta Utilities Commission Act*, S.A. 2007, c.A-37.2;
- *Electric Utilities Act*, S.A. 2003 c E-5.1;
- *Environmental Protection and Enhancement Act*, R.S.A. 2000, c.E-12;
- *Historical Resources Act*, R.S.A. 2000, c.H-9;
- *Migratory Birds Convention Act*, 1994, S.C. 1994, c.22;
- *Municipal Government Act*, R.S.A. 2000, c.M-26;
- *Occupational Health and Safety Act*, R.S.A. 2000, c.O-2;
- *Highways Development and Protection Act*, R.S.A. 2004, c. H-8.5;
- *Hydro and Electric Energy Act*, R.S.A. 2000, c. H-16
- *Public Lands Act*, R.S.A. 2000, c.P-40;
- *Safety Codes Act*, R.S.A. 2000, c.S-1;
- *Soil Conservation Act*, R.S.A.2000, c.2010
- *Species at Risk Act*, S.C. 2002. c.29;
- *Water Act*, R.S.A. 2000, c.W-3.;
- *Weed Control Act*, S.A. 2008, c. W-501; and
- *Wildlife Act*, R.S.A. 2000, c. W-10.

The following table sets out the approvals that the Project may require and the status of these approvals:

Table 4: Summary Required Approvals

Level	Approval required	Status
Federal	Canadian Standards Association Certification	Pending
Federal	Measurement Canada - Application for Certificate of Contractor Registration	Pending
Federal	NAV CANADA - Letter of Non-Objection for solar facility and met tower	Pending
Provincial	Alberta Culture - Historical Resource Act Clearance	Complete
Provincial	AESO - Market Participant Application, Generator Asset Addition Application, Participant ETS User Access Application	Pending
Provincial	AESO - System Access Services Agreement	Pending
Provincial	AEPA - Acquire Wildlife Research Permit and Collection Licence	Complete
Provincial	AEPA - Approval of the Construction and Operations Environmental Monitoring and Management Plan (within Environmental Evaluation)	Complete
Provincial	AEPA - Approval of the Post Construction Monitoring and Mitigation Program (within Environmental Evaluation)	Complete
Provincial	AEPA - Code of Practice Notification	Pending
Provincial	AEPA - Wetland Assessment and Impact Form, Wetland Assessment and Impact Report	Pending
Provincial	AEPA - Fish and Wildlife Division (Signoff)	Complete
Provincial	AEPA - Water diversion license (as required)	Pending
Provincial	Alberta Transportation – Special Move Permit: Overweight	Pending
Provincial	Alberta Transportation – Temporary Sign Installation Permit	Pending
Provincial	Alberta Transportation – Permanent Sign Installation Permit	Pending
Provincial	Alberta Transportation – Highway Access Permit	Not Applicable
Provincial	Alberta Transportation – Roadside Development Permit	Not Applicable
Provincial	AUC - Rule 007 – Solar Power Plant Approval	In Progress
Provincial	AUC - Rule 007 – Energy Storage Facility Approval	In Progress
Provincial	AUC - Rule 007 – Substation permit and licence.	In Progress
Provincial	AUC - Rule 007 – Connection Order	In Progress
Provincial	AUC - Rule 012: Noise Control – Power Plant, Energy Storage and Substation	In Progress
Provincial	AUC - NID and FA permanent connection order – Transmission	Pending
Provincial	Transmission Facility Operator (TFO) – Construction Commitment Agreement	Pending
Provincial	TFO – Interconnection Agreement	Pending
Municipal	Alberta One Call – Click / Call Before You Dig	Pending
Municipal	Development Permit from Special Areas Board no. 4	Pending

SP22

Submit a signed renewable energy referral report from Alberta Environment and Parks (AEP) Fish and Wildlife Stewardship. If the applicant is unable to provide a renewable energy referral report at time of application, the applicant must clearly identify the reason and provide details of its status.

Details regarding the renewable energy referral report from Alberta Environment and Protected Areas (AEPA) Fish and Wildlife Stewardship are provided in **Attachment 9 – AEPA Referral Report**. The assessment determined that the overall project risk ranking is **low**.

SP23, ES26 & TS31

Confirm that a Historical Resources Act approval has been obtained or has been applied.

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. If a Historical Resources Act approval has been obtained, provide a copy of it.

The HRA Approval was obtained in August 2024.

The approval documentation is included in **Attachment 10 – Historical Resources Act Approval & Historical Resource Impact Assessment**.

The Proponent completed a historic resource impact assessment as required as part of the HRA Approval. There are six known sites with a Historical Resources Value (HRV) of 0 which required no additional field work. There is one known scatter site with a HRV of 4 that requires avoidance.

No field work was required for this Project.

SP24 & ES27

If the government of Alberta, through the Aboriginal Consultation Office (ACO) or otherwise, directed consultation with an Indigenous group for related approvals (i.e., Public Lands Act, Water Act, Environmental Protection and Enhancement Act, Historical Resources Act, Government Organization Act, etc.) the applicant must provide a copy of the pre-consultation assessment, the adequacy assessment and the specific issues and response table (if prepared). If the government of Alberta, through the ACO or otherwise, indicated that a pre-consultation assessment is not required, the applicant must provide a copy of that direction. If advice from the government of Alberta has not been obtained, the applicant must provide justification for its decision to not seek advice.

The Proponent submitted a Pre-Consultation assessment on June 20, 2024, and did not receive a recommendation for consultation.

The Proponent also completed the LAIRT Report, and no groups were identified in the LAIRT report. However, the Proponent sent notification packages to the Piikani Nation, Blood Tribe, Siksika Nation, and the Metis Nation of Alberta as part of the Indigenous consultation plan. All Alberta based Indigenous groups are located over 167 km from the Project area.

SP25, ES28 & TS32 – TS36

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.)

The Proponent conducted comprehensive participant involvement activities, including the distribution of three Project-Specific Information Packages and consultations held in October 2024, November 2024 and May 2025.

As part of the engagement effort, the Proponent hosted an open house on October 24, 2024, which was attended by 24 participants. Further details regarding these activities are provided in **Attachment 14 – Participant Involvement Program Summary**.

In accordance with the Participant Involvement Program (PIP) guidelines, the Proponent made consultation attempts with all residents, landowners, and occupants within 400 meters of the Project and notified those within 800 meters. A copy of the consultation packages is in **Attachment 11 – Project-Specific Information Package**.

Currently, the Proponent is preparing another consultation package to share the changes in the project schedule with the stakeholders. Once sent out to the stakeholders, this consultation package will be shared with the AUC.

The Proponent remains committed to addressing any inquiries from the stakeholders related to the schedule, as well as all questions and concerns that may arise throughout the development, construction, and operational phases of the Project.

SP26

Confirm that, if applicable, Alberta Transportation, the municipality in which the project is located, the applicable railroad companies, and the owner of any registered and known unregistered aerodrome within 4,000 metres of the project boundary were consulted and provide a summary of any objections received, mitigations discussed, and any outstanding objections.

The project is in Special Areas No. 4, and the Proponent is engaged in regular communication with the Special Areas Board as a part of the consultation process. The Proponent has had extensive conversations with the Special Areas Board regarding Road Use Agreement preparations and anticipates executing a Road Use Agreement in Q1 2026. To date, no inquiries or concerns have been raised by the Special Areas Board.

All inquiries received during the consultation process are documented in **Attachment 14 – Participant Involvement Program Summary – Appendix A – Inquiry Record**.

SP27 & ES29

List all occupants, residents and landowners on lands within the appropriate notification radius as shown below and described in Appendix A1 – Participant involvement program guidelines, as well as Indigenous groups, owners of aerodromes or other interested persons that were consulted as part of the participant involvement program.

A list of all occupants, residents and landowners is provided in **Attachment 12 – Stakeholder List**.

SP28 & ES30

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.

A list of contact information for all persons contacted is provided in **Attachment 13 – Mailing Label Spreadsheet** (in excel format).

SP29 & ES31

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

The Proponent has actively engaged with Special Areas Board No. 4 as part of the consultation process. Notification packages were sent to the Board as outlined in the consultation plan, and no concerns have been received from the Board to date.

The Proponent held multiple meetings with representatives from the Special Areas Board, during which no major issues or concerns regarding the Project were raised.

Details of all engagement activities with the Special Areas Board are documented in Table 5: Special Areas Board Meetings and Table 6: Summary of communication with SAB 4 and Fire Chief within Section IIR7 of this document. Additionally, all questions, inquiries, and comments related to the Project are included in **Attachment 14 – Participant Involvement Program Summary, Appendix A – Inquiry Record**.

SP30 & ES32

Identify all persons who expressed a concern(s) about the project. For each person, include the following information:

- **The specifics of the concern(s).**
- **Steps taken to try and resolve the concern(s).**
- **Whether the concern(s) was resolved.**

All questions, inquiries, and comments regarding the project have been included in **Attachment 14 – Participant Involvement Program Summary – Appendix A – Inquiry Record**.

Energy Storage Facility Application Information

ES3

Describe where the proposed energy storage facility is charged from and discharged to.

The proposed energy storage facility will be capable of charging from the solar park and from the grid. The facility is designed to discharge energy back to the grid.

ES4

Summarize the discussions held with the independent system operator (ISO), transmission facility owner, and/or distribution facility owner regarding the interconnection of the proposed energy storage facility, including any concerns indicated and solutions proposed.

Sounding Creek Solar Energy Park has moved into Stage 3 of AESO's Cluster 1 process. The Proponent has provided Stage 3 & 4 security to the TFO (ATCO) to move from Stage 2 to 3. No concerns have been raised by the ISO regarding the Project.

ES5

Provide a single-line diagram for the project including the metering points for the proposed project.

The Single-line diagram is attached in **Attachment 16 – Single-Line Diagram**

ES6

Describe the recycling plan, based on current regulations, for the energy storage facility at project end of life and confirm the final recycling plan will be in accordance with the regulation at the time of decommissioning.

At the end of the project life, the recycling plan will involve returning battery packs to the manufacturer's facility or an approved third-party recycler. The batteries will be collected and transported using specially designed containers to ensure safe and proper handling. Battery recycling companies may provide logistics support, including cross-border transportation, to deliver batteries to designated recycling facilities. At these facilities, batteries are typically sorted by type and size, with hazardous materials carefully removed. Any remaining components or materials will be transferred to the appropriate processing sites for appropriate facilities for reconditioning, salvage, recycling, and/or disposal in accordance with the regulations at the time of decommissioning. The Proponent confirms the final recycling plan will be in accordance with the regulations at the time of decommissioning.

ES19

Provide a summary of feedback received to date from Alberta Environment and Protected Areas addressing the environmental aspects of the project and any mitigation measures and monitoring activities recommended by Alberta Environment and Protected Areas.

Feedback was received from Alberta Environment and Protected Areas, Fish and Wildlife Stewardship (EPA-FWS), regarding the renewable energy project. Their review looked at the proposed site, planned mitigation measures, construction details, and the Proponent's post-construction monitoring program. EPA-FWS concluded that the Sounding Creek Solar Energy Park presents a low risk to wildlife and their habitats.

Transmission/Substation Facility Application Information

TS2

Confirm if the application is for a customer project or an application related to a proposal for a market participant under Section 24.31 of the *Transmission Regulation*.

This is not applicable.

TS5

Provide a copy of the ISO direct assignment letter pursuant to the Electric Utilities Act. Alternatively, if a needs identification document was not required, provide a copy of the ISO approval letter pursuant to the abbreviated needs approval process, or a statement that the project was exempt pursuant to Section 1.4.1(a) of this rule.

This is not applicable.

TS6

Provide the most up-to-date functional specification issued by the ISO:

The Proponent has not received a functional specification as of the submission of this application. Once the Proponent receives the Functional Specification, it will be uploaded to the AUC e-filing system.

TS7

Describe the design and ratings of the transmission line and major elements of the substation.

The design and ratings of the transmission line and major elements of the substation will be available in the functional specification, which will be shared via e-filing once it is available.

TS8

If the ISO requires the facility applicant to determine the choice of conductors, describe the conductor size and arrangement selected and the basis for the conductor selection.

This is not applicable.

TS9

If the application is not direct assigned by the ISO, provide the rationale for the rating/size of any proposed conductor or piece of major substation equipment.

This is not applicable.

TS10

Describe the proposed transmission line structure type, including height and spacing; if more than one type of structure is proposed, state where each type will be used.

This is not applicable.

TS11

State the right-of-way width and the basis for determining the width.

This is not applicable.

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.

The equipment being applied for will be listed in the functional specification.

TS13

Describe the switching and protection features of the proposed transmission facilities.

This requirement is not applicable to the Project. This application is in reference to a substation only.

TS14

Describe the electrical interaction of proposed lines with other facilities, such as pipelines, telephone, radio and television transmission facilities, and other surface structures.

This is not applicable.

TS15

Describe the changes to existing facilities required to accommodate the proposed facilities.

This is not applicable. Any changes required to existing facilities are identified in the Need Identification Document and the Facilities Application submitted by AESO and ATCO respectively.

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.

This is not applicable.

TS17

Provide an electric single-line diagram or switching map showing new facilities in place in the system. In the case of a substation, provide an electric single-line diagram and a substation layout diagram, including major items of equipment and the fenced boundary of the substation, with units of measure/scale.

The single-line diagram will be provided in the Functional specification.

TS18

Discuss the construction schedule, equipment and method of construction, and method of eventual right-of-way maintenance.

This is not applicable.

TS20

If available, provide the location of any required temporary or permanent workspace areas and access roads, and state whether these locations are requested to be listed in a permit and licence.

This is not applicable.

TS21

Provide the following drawings and maps with units of measure/scale and the direction of north specified:

- i. **A legible map defining the study area and state the reasons for the chosen area.**
- ii. **Legible maps of the proposed facilities showing:**
 - I. **The preferred transmission line route and any alternative routes or segments.**
 - II. **Right-of-way widths.**
 - III. **Location of the transmission line on the right-of-way.**
 - IV. **Location of the transmission line relative to property lines.**
 - V. **Kilometre points along each transmission line route.**
- iii. **Legible maps and air photo mosaics upon which the proposed transmission line route(s) and/or substation have been imposed and showing the residences, landowner names, and major land use and resource features along the routes and/or adjacent to the substation (e.g., agricultural crops or pasture, topography, soil type, existing land use, existing rights-of-way, existing or potential historical, archaeological or paleontological sites, and superficial and mineable resources).**
- 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.**

Details have been included in **Attachment 2 – Maps and Figures**.

Please note that these maps show substation but not the transmission line details as the Proponent is not applying for the transmission line.

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.

This requirement is not applicable to the Project. This application is in reference to a substation only.

TS23

If applicable, describe the measures proposed to minimize potential visual effects of the proposed development, including the identification of project components and locations that require screening and the screening measures (e.g., fences, earth berms, painting, landscaping) to be used.

Neither the Proponent nor the stakeholders have identified any significant viewpoints in relation to the proposed substation. The Proponent does not propose any mitigation measures to minimize the visual

effects of the substation. This decision is based on conversations with Landowners, and the substation's proximity to existing electrical infrastructure.

TS24

Submit an environmental evaluation of the project. The environmental evaluation must:

- **Describe the present (pre-project) environmental and land-use conditions for the proposed route, substation location and any alternatives.**
- **Identify and describe the potential effects of construction and operation of the project on the environment. In particular, describe any potential adverse effects on soils, terrain, vegetation species and communities, wetlands, wildlife species and wildlife habitat, aquatic species and habitat, groundwater, surface water bodies and hydrology, environmentally sensitive areas, and land use within the local study area following and referencing published Alberta Environment and Protected Areas (AEPA) guidelines if applicable.**
- **Describe the methodology used and any field surveys conducted to identify, evaluate, and rate any potential environmental effects and determine their significance, along with an explanation of the scientific rationale for choosing this methodology.**
- **Describe the mitigation measures the applicant proposes to implement during the life of the project to reduce the potential adverse effects.**
- **Describe the predicted residual adverse effects of the project and their significance after implementation of the proposed mitigation.**
- **Describe any monitoring activities the applicant proposes to implement during the life of the project to verify the effectiveness of the proposed mitigation.**
- **List the qualifications of the individual(s) who conducted or oversaw the environmental evaluation.**
- **Present an overall comparison of the proposed routes, in particular, identify the environmental features and any potential environmental effects (e.g., on native vegetation communities, rare plants, wetlands, topography, unique terrain features, sensitive soils, wildlife species setbacks and wildlife habitat, and environmentally significant areas), and identify land use and resource features (e.g., agricultural, residential, recreational, forestry, trapping and hunting areas, protective notations, and existing or potential archaeological sites) for each route in a table with stated units (kilometre, total number, etc.).**
- **Summarize the compatibility of the proposed facility with various municipal services if a proposed transmission line passes through or immediately adjacent to an urban centre.**
- **If the project crosses agricultural land, describe any plans to prevent the spread of weeds and pests on agricultural land.**
- **If the project involves the modification or repair of an existing substation, describe any current or past on-site use of polychlorinated biphenyls (PCB) and summarize any site-specific incident spill records. Where soil disturbance will occur on or**

immediately adjacent to the substation site, describe any soil sampling or contamination assessment to be undertaken and describe any plans to safely manage, transport and dispose of contaminated soils.

Details have been included in **Attachment 4 – Environmental Evaluation & AEPA Submission Report.**

TS27

Describe any decommissioning of existing transmission facilities and describe the reclamation plan that will be carried out, including for any temporary workspace areas and temporary access roads following commissioning.

This requirement is not applicable to the Project. This application is in reference to a substation only.

TS30

For the preferred route and possible alternatives, applicants must provide a summary of feedback received to date from AEPA (including the local wildlife biologist of AEPA) addressing the environmental aspects of the project, and confirmation that AEPA is satisfied with any proposed mitigation measures and monitoring activities, or identify any unresolved project aspects where agreement with AEPA was not achieved.

The AEPA referral report for the Project includes the substation only. The AEPA referral report is provided in **Attachment 9 – AEPA Referral Report.**

TS37

Provide an AACE Class 3 cost estimate for the preferred route and all alternatives on a common basis, in accordance with the requirements in ISO Rules Section 504.5 and the AESO Information Document #2015-002R, Service Proposals and Cost Estimating. The format of the cost estimate provided must take the form of the estimate summary that is obtained by completing the AESO's cost estimate template (available on the AESO web page). Where identifiable, include costs to be borne by persons other than the applicant and the applicant's customer(s) in the comparison. This information requirement may not be applicable to market participant and merchant line applications.

Not applicable.

TS38

In addition to the above, if the applicant is a market participant applying under Section 24.31 of the Transmission Regulation, the applicant must also:

- **Provide confirmation that all required agreements are in place with the TFO including the asset transfer agreement, the written agreement with the TFO for the temporary operation of the transmission facility, if available, and confirmation of ISO approval of the connection proposal.**
- **Specify the temporary period for which the market participant expects to hold the operating licence, which may not exceed the term specified in the written agreement with the TFO for the temporary operation of the transmission facility.**

Not Applicable.

TS39

If an energy storage facility is to be constructed and operated as part of a transmission line, the applicant must also submit the information specified in Section 10.

Not Applicable.

TS40

An applicant seeking to construct and operate an energy storage facility as part of a transmission line must provide the approval number for the associated needs identification document application.

Not Applicable.

Interconnection Application Information

The Proponent hereby makes application to the AUC, pursuant to Section 18 of the *HEEA*.

IC1

Provide a statement that the local distribution facility owner has agreed to the interconnection, the legal subdivision (LSD) of the interconnection point, and an electric single-line diagram showing the interconnection point with the distribution facility owner.

This is not applicable.

IC2

Provide a statement from the ISO, at such time determined by the ISO, that endorses the interconnection and confirms that the interconnection will not result in adverse effects to the interconnected electric system.

Once available, the Proponent will provide the Functional Specification as Attachment 17 to confirm that the ISO endorses the interconnection and confirms that the interconnection will not result in adverse effects on the interconnected electric system.

Interim Information Requirements

These information requirements fulfill Bulletins 2024-25 and 2025-06.

Agricultural Land

IIR1

Using the current version of the Agricultural Regions of Alberta Soil Inventory Database (AGRASID), please describe the agricultural capability of soils intersecting the project footprint as provided in the spring-seeded small grains (“SSSGRAIN”) attribute of the Land Suitability Rating System (“LSRS”) table. Provide a table showing the amount of area for each LSRS class impacted by the project in hectares (e.g. 80 hectares of Class 2).

Details have been included in **Attachment 5 – Environmental Evaluation & AEPA Submission Report**.

Table 5: Land Suitability rating for agricultural crops: spring-seeded small grains

Map Unit Name	Land Suitability Rating	Map Unit Area (%) ¹	Project Footprint (ha)
DHHU1/U1h	5M	100	173.3
HDHU16/U1h	4M	40	107.5
	6M	60	
SIG1/U1h	5M	100	115.5
SIL1/U1le	5M	100	53.2
Total ²	-	-	449.6

Ha= hectares; % = percent

1. The percentage area cover represents the proportion of the soil polygon, not the project area
2. Sums may not equal totals shown due to rounding

IIR2

For the Project footprint, identify whether:

- a) The Project lands contain irrigation infrastructure.
- b) The Project lands are within an irrigation district. If so, whether:
 - The Project has been discussed with the applicable irrigation district.
 - Irrigation acres (either permanent, terminable or annual) are or have been assigned to the project lands.
 - An application for water rights or irrigation acres has been made for the project lands.
- c) The landowners have obtained a Private Irrigation Water Licence for irrigating the project lands.

Lands within the Project footprint does not contain any irrigation infrastructure. The Project lands are also not located within an irrigation district, as identified by the Alberta Irrigation Districts Association.

The Landowner has not obtained a Private Irrigation water License for irrigating the Project lands.

IIR3

List the professional qualifications of the author(s) who prepared or reviewed the above information regarding agricultural land.

Details have been included in **Attachment 5 – Environmental Evaluation & AEPA Submission Report.**

IIR4

Submit an agricultural impact assessment if any LSRS Class 1 or Class 2 land is reported within the project footprint, or if any Class 3 land is reported within the project footprint and the project is within a municipality identified in “Schedule 1 - Class 3 Land Municipalities” in the Electric Energy Land Use and Visual Assessment Regulation.

As per the LSRS, the Project lands are classified as Class, 4, 5 and 6. Therefore, no agricultural impact assessment was conducted for this Project.

MUNICIPAL LAND USE

IIR5

Confirm whether the proposed power plant or energy storage facility complies with the applicable municipal planning documents including municipal development plans, area structure plans, land use by-laws and other municipal by-laws.

The Project complies with all currently provided documents pertaining to the Municipal Development Plan, Land Use Order, and other municipal by-laws of the Special Areas Board (Special Areas no. 4).

IIR6

Identify any instances where the proposed power plant or energy storage facility does not comply with applicable municipal planning documents and provide a justification for any non-compliance.

The Project complies with all currently provided documents pertaining to the Special Areas Board Development Plan.

IIR7

Describe how the applicant engaged with potentially affected municipalities to modify the proposed power plant or energy storage facility or to mitigate any of its potential adverse impacts to the municipality, prior to filing the application.

The proponent has been consulting with Special Areas Board No. 4 through various phone calls and emails since July 2023. There have been two in-person meetings with the Special Areas Board in the Village of Consort. These meetings are summarized in the following table:

Table 6: Special Areas Board Meetings

Date	Attendees	Meeting Agenda
7 March 2024	- Jordon Christianson - Chair – Special Areas Board. - Taryl Abt – Development Officer, Special Area 4 - Darran Dick – Development Officer – Special Area 3 - Brent Fecho - Superintendent of Roads & Equipment	- Presentation by EDPR about Sounding Creek Solar Energy Park with BESS outlining: I. About EDPR North America II. Supporting Team III. Project Overview IV. Project Location V. Project Components VI. Project Timeline VII. Wildlife & Environmental Studies

Date	Attendees	Meeting Agenda
	- Trent Caskey - Director – Property Administration - Shaune Kovitch - Director – Municipal Services - Rob Palmer – Fire Chief, Village of Consort	VIII. Preliminary Glare study results IX. Soil Quality X. AUC land use regulations XI. Decommissioning plan XII. Emergency Response Plan, Vegetation Management and Traffic Management Plan XIII. Local Support
26 June, 2024	- Rob Palmer – Fire Chief, Village of Consort - Taryl Abt – Development Officer, Special Area 4	- EDPR provided updates, including planning an open house. - Employment of local people - Community Financial Support - Discussion on ERP - Discussion on Road Use Agreement

In addition to the above-mentioned in-person meetings, Christian Pollard from EDPR connected with both Taryl Abt and Rob Palmer for several times via phone calls and email communications. These communications are summarized in the following table:

Table 7: Summary of Communication with SAB 4 and Fire Chief

Communication Timeline	Associated Persons	Communication Summary
October 28, 2024, to December 3, 2024	- Christian Pollard- EDPR - Taryl Abt – Development Officer, Special Area 4	Discussion on the Emergency Response Plan and potential ways to support the community, including providing financial support for local fire response.

Communication Timeline	Associated Persons	Communication Summary
February 21, 2025 to June 17, 2025	- Christian Pollard- EDPR - Evan Balcombe – Fire Risk Alliance - Rob Palmer – Fire Chief, Village of Consort.	Christian offered a Battery Energy Storage System (BESS) safety education session to Rob Palmer and the SAB and Cypress County Fire Departments. This session was being offered through EDPR’s industry partner Fire Risk Alliance (FRA). Other county representatives, including Cypress County, were also invited to the session.

RECLAMATION SECURITY

IIR8

Describe the reclamation security program for the proposed power plant, including details on:

- The standard to which the project site will be reclaimed to upon decommissioning.
- How the amount of the reclamation security will be calculated.
- The frequency with which the reclamation security amount will be updated or re-assessed.
- When the reclamation security will be in place to be drawn upon, if needed.
- What form the reclamation security will take (e.g., letter of credit, surety bond, other).
- The security beneficiaries to whom the reclamation security will be committed.
- How the beneficiary can access the security and any constraints on such access.
- A report prepared by a third party estimating the costs of reclaiming the proposed project. The report must include the estimated salvage value of project components.
- An explanation of why the chosen form of security was selected, having regard to its attributes and priority in bankruptcy, including how the secured party would be able to realize on the reclamation security should the project owner and operator be in default.

Table 8: Reclamation Information Responses

Information Requirement	Details
The standard to which the project site will be reclaimed to upon decommissioning	The reclamation will abide by the current standards at the time of reclamation. The

Information Requirement	Details
	Proponent will remove all equipment up to 1.0m below the ground, return the land to its full agricultural use aligned with the Code of Practice. The proponent may leave access roads if requested by the landowner in writing.
How the amount of the reclamation security will be calculated.	The Reclamation security is calculated on a \$ per MW basis.
The frequency with which the reclamation security amount will be updated or re-assessed.	The reclamation security amount will be placed in Year 15 after the Commercial Operation Date, with a reassessment every 5 years until the end of the Project's life.
When the reclamation security will be in place to be drawn upon, if needed.	The security will be placed in year 15 after the Commercial Operation Date. The security will be made available within 12 months after the lease is terminated or 18 months after the project has stopped operating.
What form the reclamation security will take (e.g., letter of credit, surety bond, other).	Within the lease agreement, the Proponent shall post a bond, letter of credit, corporate guarantee or equivalent security.
The security beneficiaries to whom the reclamation security will be committed.	The beneficiaries are the landowners.
How the beneficiary can access the security and any constraints on such access.	Access to the security will be set up in Year 15 of the Project
A report prepared by a third party estimating the costs of reclaiming the proposed project. The report must include the estimated salvage value of project components.	Please see Attachment 15 – Reclamation Cost Report
An explanation of why the chosen form of security was selected, having regard to its attributes and priority in bankruptcy, including how the secured party would be able to realize on the reclamation security should the project owner and operator be in default.	The Proponent plans to use a bond as its form of reclamation security but will be dependent on the lease agreements. Surety bonds are already a common mechanism for reclamation and liability coverage in Alberta making them familiar and easily understood by landowners and financial institutions. The bond provides immediate access to funds, and allows for multiple beneficiaries, increasing ease of access in the extremely unlikely event of a claim. Additionally, a bond does not require the operator to tie up significant capital that could otherwise be used in the operation of the project.

Please see **Attachment 15 – Reclamation Cost Report** for a report detailing reclamation costs.

IIR9

For wind and solar power plant applications:

Confirm whether the applicant will:

- **Provide reclamation security to the Government of Alberta;**
- **Provide reclamation security to hosting landowners; or**
- **A combination of both.**

If either (ii) or (iii) is chosen, provide sufficient information to confirm whether the applicant intends to follow the Reclamation Security Guidelines for Wind and Solar. If not, explain any differences.

The applicant will provide reclamation security to hosting landowners.

The Proponent followed the guidelines provided in the *Code of Practice for Solar and Wind Renewable Energy Operations* to prepare a reclamation cost report. Please see **Attachment 15 – Reclamation Cost Report**

VISUAL IMPACT ASSESSMENT

IIR10

For all types of power plants located within a buffer zone or a visual impact assessment zone, as defined in Schedule 2 and Schedule 3 of the regulation, submit a visual impact assessment.

Not Applicable. The Project is not located within a Buffer Zone or Visual Impact Assessment Zone.

CUMULATIVE EFFECTS

IIR11

Please confirm whether the applicant is aware of other existing developments in the project area that could cumulatively affect the rural setting/landscape due to their proximity and/or number.

The Project is located within the approved Sharp Hills Wind Project boundary. The Proponent is not aware of any other existing developments in the project area.

IIR12

Please discuss any potential positive or negative cumulative social, economic or environmental impacts or effects that may occur considering the proposed project, existing developments and any other currently planned developments. This discussion may include, but is not limited to, any economic spinoffs, community and employment benefits, visual

impacts, proliferation, land fragmentation (including fragmentation of agricultural uses, wildlife habitat fragmentation, etc.), the impact of adherence to municipal planning documents, wildlife, species at risk, air quality impacts, recreational or tourism impacts, impacts to existing or anticipated resource development, wetlands, native grasslands, watersheds and water quality impacts, and surface management.

The Proponent has provided potential positive or negative cumulative impacts below.

Economic

The socio-economic impacts of the Project are anticipated to be positive. The Project will create new business opportunities in the local area while generating substantial tax revenues for the municipality, province, and federal government. Although temporary increases in workforce and traffic are expected during construction, the long-term benefits through tax contributions are significant, particularly given the minimal demand the Project will place on municipal services. The Proponent is not aware of any existing or anticipated pressures on local infrastructure that would be worsened by the Project and therefore does not anticipate any notable adverse cumulative effects. In addition, the Project represents a capital investment of approximately \$225 million and will contribute millions of dollars in property, provincial, and federal taxes. These benefits are further strengthened when considered alongside the existing Sharp Hills Wind Project, also owned by the Proponent. Additional information is provided in the Open House poster boards within **Attachment 11 – Project Specific Information Package**.

Community and Employee Benefits

The Project will deliver positive impacts for both the community and the workforce. During construction, it is expected to create approximately 400 jobs, with up to 7 permanent positions supported through the operation of the solar and energy storage facilities. In addition to employment opportunities, the Proponent has committed to completing a Community Impact Assessment prior to construction to ensure that local perspectives and priorities are reflected in project planning. Together with the existing wind project, these initiatives will provide long-term economic, social, and environmental value for the region. Additional information is provided in the Open House poster boards within **Attachment 11 – Project Specific Information Package**.

Visual Impacts

As noted in IIR10, the Project is not located within a visual impact zone. However, the Proponent completed visual simulations for the stakeholder consultation and open house. The visual simulations consider the existing Sharp Hills Wind Project. No concerns were raised by stakeholders regarding the visual impact and no negative impacts are expected by the visual impacts.

Land Fragmentation

The Project is expected to have limited negative impacts on land fragmentation. Wind and storage facilities require relatively small footprints, allowing agricultural use to continue around them. The solar array has been designed as a continuous block, which helps reduce edge effects and minimize fragmentation of the surrounding landscape. While some disturbance will result from access roads, fencing, and turbines, clustering infrastructure and careful siting will limit these effects, and no significant negative impacts are anticipated.

Wildlife and Species at Risk

Alberta Environment and Protected Areas (AEPA) does not provide a framework, parameters, or thresholds to assess the significance of cumulative effects from solar developments on wildlife. AEPA determines the potential impacts of a given project on wildlife and wildlife habitat through the Wildlife Directive for Alberta Solar Energy Projects (2017; Wildlife Directive), which provides standards and best management practices

to reduce or mitigate potential impacts. Further, the Renewable Energy Risk Framework (Government of Alberta 2023) provides guidance on how risks to wildlife and wildlife habitat are assessed by AEPA based on the results of preconstruction wildlife surveys, Project Footprint, and proposed mitigation measures.

AEPA reviewed the Project and determined in the Renewable Energy Referral Report (RERR) that the Project posed an overall Low risk to wildlife and wildlife habitat (Government of Alberta 2024). An overall risk ranking of Low is defined as “The project meets most requirements to reduce disturbance and mortality of wildlife, and destruction or degradation of wildlife habitat as identified in the Directives or has identified alternative mitigations that meet the objectives” (Government of Alberta 2023). AEPA did not provide a risk ranking for each subcomponent of wildlife and wildlife habitat.

Following the RERR, the Project subsequently further reduced the Project Footprint from 459.2 ha to 449.6 ha as the Project Footprint was revised. The Project Footprint encroaches one sharp-tailed grouse lek setback (SRSTGRL01) and one ferruginous hawk nest setback (SRFEHAN01), but has provided mitigation measures for these encroachments in the Environmental Evaluation.

Potential effects of the Project assessed by AEPA include increased wildlife mortality and alteration of wildlife habitat. Aside from the Sharp Hills Wind Project located within the Project Area, there are no other renewable energy projects within 24 km that would further contribute to these effects. In addition, there is development activity of various other industry types in the MD, but no clustering of other development activity in the Project Area.

While solar and wind energy projects can contribute to wildlife mortality, they remain relatively low sources of bird mortality as compared to other anthropogenic sources such as domestic cats and window collisions (Loss et al. 2013a, 2013b; Rabie et al. 2024; Walston et al. 2016), especially when comparing solar mortalities recorded in Alberta (28847_X0221, PDF pages 25 – 32).

The Project has the potential to alter higher value wildlife habitat such as native grassland and wetlands. As described in the Environmental Evaluation, the Project is predominantly sited in cultivation (91%; 411.0 of 449.6 ha) with limited Project Footprint located in wetlands and ephemeral waterbodies (7%; 32.0 of 449.6 ha) and native grassland (<1%; <0.1 of 449.6 ha). Cumulative effects to wetlands and native grassland are discussed further in the cumulative effects sections for Surface Waterbodies and Hydrology as well as Vegetation Species and Communities. As outlined in the Conservation and Reclamation Plan, tame grassland (i.e., perennial agronomic vegetation) will be established within the Project Footprint, which would increase plant biodiversity in areas previously used for cultivation. While the Project fence does have the potential to exclude wildlife species such as ungulates from wildlife habitat, the fence has been sited to provide access to native grassland as well as to most Class III and above wetlands within the Project Area (see Environmental Evaluation). The Sharp Hills Wind Project was also proposed to be sited predominantly on cultivation and does not have an exclusion Project fence as proposed in this Project (22665_X0007, PDF pages 42 to 43).

Given the Low risk ranking from AEPA, the relatively low potential levels of bird mortality, and the Project’s potential to affect wildlife habitat, further consideration to cumulative effects has not been provided for wildlife.

Air Quality Impacts

All air quality assessments are cumulative, as required by Alberta Environment and Protected Areas Air Quality Model Guideline.

Accidental releases do not consider cumulative impacts as they are temporary and transient and do not add a cumulative impact to ambient air quality (for instance a thermal gas plant would have continuous emissions for multiple years that would have a measurable change to ambient air quality for the lifespan of the project).

Tourism Impacts

The Proponent does not expect any potential impacts on tourism for the area as a result of the solar, energy storage, and wind project. Tourism in and around Oyen is primarily focused on community events, heritage attractions, and recreational facilities such as the Crossroads Museum, rodeos, and golf. These activities take place within the town and established venues and are not dependent on uninterrupted natural landscapes. The Project will be located on agricultural lands outside of these areas, and once operational, it will be low impact on local tourism.

Wetlands, Surface Water, and Hydrology

AEPA determined that the Project posed an overall Low risk to wildlife and wildlife habitat, but did not provide a risk ranking specifically for wetlands (Government of Alberta 2024). As provided in the Environmental Evaluation, for Class III and above wetlands the Project Footprint encroaches the delineation of one seasonal wetland, as well as the 100 m setbacks of two semi-permanent wetlands and 21 seasonal wetlands. The Wildlife Directive does not provide a framework or threshold to assess the cumulative effects from solar development on wetlands. However, the Alberta Wetland Policy (Government of Alberta 2013) provides a framework for managing wetland impacts following a cumulative effects-based approach. It requires that proponents with wetland impacts after attempting to avoid and mitigate, pay compensation for those impacts and offset them through the Alberta Wetland Policy. This approach balances the Project effects of wetlands with economic development, while working within a cumulative effects framework.

The Alberta Wetland Policy also evaluates relative wetland value based on five characteristics: biodiversity, water quality improvement, hydrologic function, human uses, and relative abundance. This approach acknowledges that some wetlands provide greater ecological and functional benefits than others. The Project will provide ecological benefits and additional wetland function to wetlands currently located in cultivation. In areas where the Project will remove annual cultivation within wetlands, this will allow riparian and wetland vegetation to establish, and therefore increase the ecological value of these wetlands.

By adhering to the Alberta Wetland Policy, Water Act and Water (Ministerial) Regulations, the Project will address cumulative effects to surface waterbodies and hydrology. The Project has avoided all but one Class III and above wetland, and will implement the mitigation measures described in the Environmental Protection Plan to reduce impacts. Further, it will obtain approvals under the Water Act for wetland and waterbody disturbance, replacing impacted temporary wetlands by paying compensation for direct impacts in accordance with the Alberta Wetland Policy. Potential effects to ephemeral waterbodies will be addressed through a Water Act approval as they are not defined as wetlands in Alberta. In addition, the Project is not proposing to alter surficial hydrology including the alteration of any watercourses this maintaining water volume and quality, and therefore no cumulative downstream impacts need to be assessed. Adherence to these policies will address cumulative effects to surface waterbodies and hydrology for the Project.

Native Grasslands, Vegetation Species and Communities

AEPA determined that the Project posed an overall Low risk to wildlife and wildlife habitat, but did not provide a risk ranking specifically for native and critical habitats (Government of Alberta 2024). As stated in the Environmental Evaluation, the Project will impact <0.1 ha of native grassland with secondary infrastructure (i.e., directional drill pits for collector lines), but has proposed mitigation measures in the EPP to address this potential impact. Additionally, the Project is not sited within the AEPA Endangered and Threatened Plant Range (Government of Alberta 2024). A desktop search of ACIMS returned no records of listed plants or plant communities within one km of the PA. Given the size of the proposed disturbance to native grassland and mitigation measures committed to, further consideration of cumulative effects to vegetation species and communities has not been provided.

Watershed and Groundwater

Potential effects to groundwater are discussed in the Environmental Evaluation and detailed in the Hydrogeological Effects Assessment provided in Appendix A. Potential effects to groundwater quality and quantity were determined to not be significant. Further, the Project does not propose material water

consumption or discharge. Therefore, further consideration to groundwater cumulative effects has not been provided.

Noise Impacts

All noise impact assessments are cumulative with ambient conditions as well as existing and approved regulated projects as required by AUC Rule 012. The thresholds in Rule 012 allow for a set amount of noise level increases to a maximum threshold. Any potential future development that has not been approved must limit their noise contributions to maintain noise to below that threshold. This approach means cumulative effects from noise are consistently limited to the change allowed by Rule 012.

IIR13

Please discuss the applicant's alignment, or efforts to align, with Alberta's Land-use Framework and the economic, orderly and efficient development of industrial facilities including efficient land use principles.

The Proponent aligns with Alberta's Land Use Framework and the South Saskatchewan Regional Plan (SSRP), which promotes responsible development of renewable energy to support greener energy production, economic growth, and sustainable communities. The Project is sited to optimize land use, minimize fragmentation through a continuous solar array and clustered infrastructure, and maintain compatibility with agricultural and existing land uses. The Proponent is also aligned with the efficient land use principles by collocating the existing Sharp Hills Wind Project with the Sounding Creek Solar Energy Park.