AUC
Alberta Utilities Commission

Alberta Electric System Operator
Needs Identification Document Application

AltaLink Management Ltd.
Facility Applications

Berland River Transmission Connection Project

October 15, 2025

Alberta Utilities Commission
Decision 29355-D01-2025: Berland River Transmission Connection Project

Alberta Electric System Operator
Needs Identification Document Application
Proceeding 29355
Application 29355-A001

AltaLink Management Ltd.
Facility Applications
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Applications 29355-A002 to 29355-A008

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The Commission may, no later than 60 days from the date of this decision and without notice, correct typographical, spelling and calculation errors and other similar types of errors and post the corrected decision on its website.

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1 Decision summary

1. In this decision, the Alberta Utilities Commission approves a needs identification document (NID) application from the Alberta Electric System Operator (AESO) and facility applications from AltaLink Management Ltd. for the Berland River Transmission Connection Project. For the reasons that follow, the Commission finds that approval of the applications is in the public interest having regard to the social, economic and other effects of the proposed facilities, including their effects on the environment. Further, the Commission approves AltaLink's preferred route, which it finds to have lower overall impacts than the alternate route, primarily on the basis of lower environmental impacts and lower costs.

2 Introduction and background

2. The AESO filed an application with the Commission, pursuant to Section 34 of the *Electric Utilities Act*, seeking approval of the need for transmission facilities to connect a pipeline compressor station (the Berland River compressor station) owned by NGTL GP Ltd., as general partner on behalf of NGTL Limited Partnership (NGTL), to the Alberta Interconnected Electric System (AIES). The solution proposed by the AESO is a new 138-kilovolt (kV) transmission line between a new substation, the Berland River 1182S Substation, which would be constructed adjacent to the Berland River compressor station, and a new switching substation, the Pine Creek 328S Substation, which would be constructed in the Fox Creek area. Other transmission lines and substations in the area would also need modifications to accommodate these new facilities.

3. To meet the need identified by the AESO, AltaLink filed facility applications with the Commission for approval to:

- Construct and operate a new 138-kV substation, designated as Berland River 1182S Substation.
- Construct and operate a new 138-kV switching substation, designated as Pine Creek 328S Substation.
- Construct and operate a new 138-kV transmission line, designated as Transmission Line 620L, approximately 59.3 kilometres in length between the Berland River 1182S Substation and the Pine Creek 328S Substation.

- Alter the existing Transmission Line 685L to an in-and-out configuration at the proposed Pine Creek 328S Substation. Transmission Line 685L would be split into two creating Transmission Line 685L, between Deer Hill 1012S and Pine Creek 328S substations, and Transmission Line 614L, between Pine Creek 328S and Benbow 397S substations.

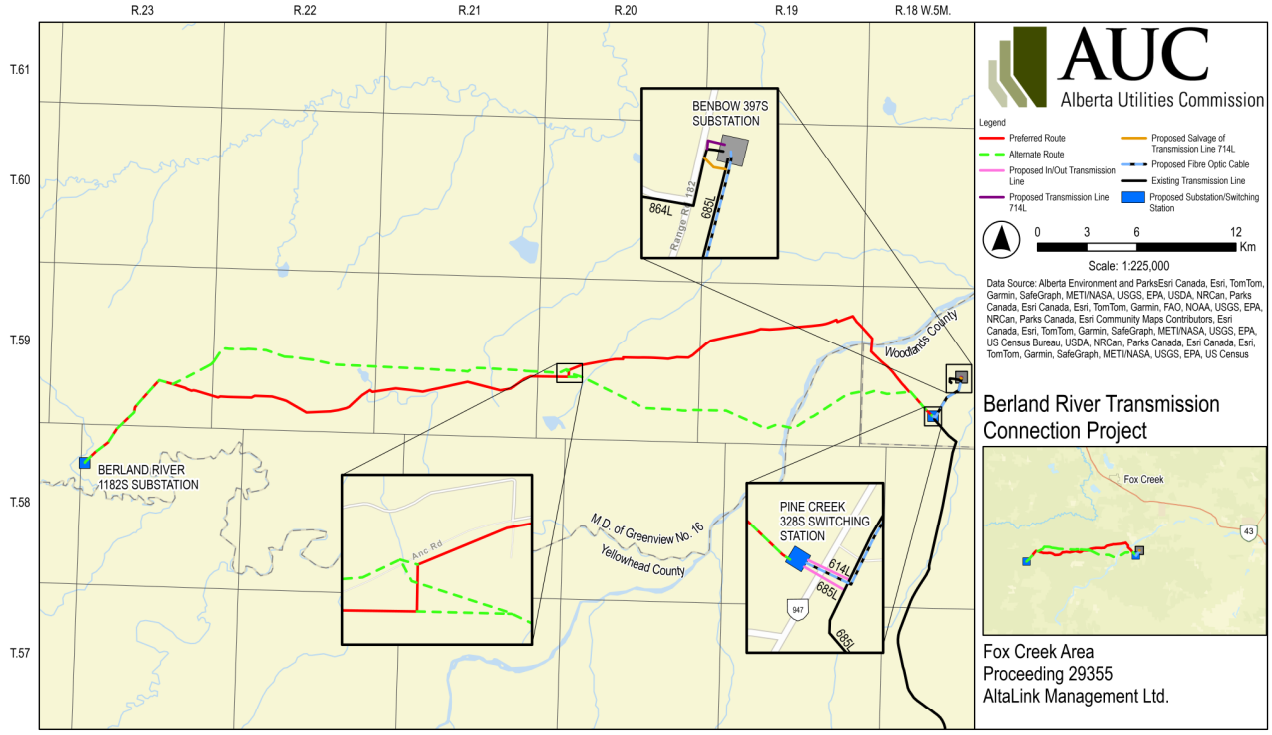
- Alter the existing Benbow 397S Substation by adding a 138-kV circuit breaker.

- Alter the existing Transmission Line 714L to terminate at the new 138-kV circuit breaker at Benbow 397S Substation.

- Construct or modify system protection and controls to accommodate the new facilities.

4. AltaLink proposed a preferred and alternate route for Transmission Line 620L as shown in Figure 1. AltaLink stated that the preferred route has lower environmental impacts and follows more existing linear disturbances compared to the alternate route.

Figure 1. Berland River Transmission Connection Project



5. The Commission issued notice of the proceeding and received statements of intent to participate from Swan River First Nation (SRFN), Driftpile Cree Nation (Driftpile) and Lac Ste. Anne Métis Community Association (LSAMCA). The Commission also received statements of intent to participate from NGTL, the Industrial Gas Consumers Association of Alberta (IGCAA) and the Western Export Group (WEG) in support of the NID and facility applications. The Commission granted all these parties standing. Neither IGCAA nor WEG directly participated in any subsequent process steps, but IGCAA provided a letter to support the timely approval of the applications as part of NGTL's evidence.

6. This decision begins with a discussion of how the Commission decides on NID and related facility applications and then sets out the Commission's findings on the NID. The Commission then provides its findings on the AltaLink facility applications, focusing on issues of environmental impacts and cumulative effects, impacts to Aboriginal and treaty rights, and considerations related to the preferred or alternate route. Finally, the Commission summarizes its findings on the public interest with respect to environmental, economic and social effects.

3 How the Commission assesses NID and facility applications

7. Generally, two approvals from the Commission are required to build new transmission facilities in Alberta. The first is an approval of the need for expansion or enhancement to the AIES, pursuant to Section 34 of the *Electric Utilities Act*. The second is a permit to construct and a licence to operate a transmission facility, pursuant to sections 14 and 15 of the *Hydro and Electric Energy Act*.

8. The AESO, in its capacity as the Independent System Operator established under the *Electric Utilities Act*, is responsible for preparing and filing a NID application with the Commission for approval. Section 34 describes the circumstances under which the AESO must file a NID application:

> **34(1)** When the Independent System Operator determines that an expansion or enhancement of the capability of the transmission system is or may be required to meet the needs of Alberta and is in the public interest, the Independent System Operator must prepare and submit to the Commission for approval a needs identification document that
>
> (a) describes the constraint or condition affecting the operation or performance of the transmission system and indicates the means by which or the manner in which the constraint or condition could be alleviated,
>
> (b) describes a need for improved efficiency of the transmission system, including means to reduce losses on the interconnected electric system, or
>
> (c) describes a need to respond to requests for system access service.

9. In Decision 2004-087, the Commission's predecessor, the Alberta Energy and Utilities Board, described the NID process as follows:

> It is the Board's view that section 34 contemplates a two-stage consideration of an NID. In the first stage, the Board must determine whether an expansion or enhancement of the capability of the transmission system is necessary to alleviate constraint, improve efficiency, or respond to a request for system access…
>
> If it is determined that expansion or enhancement of the system is required to address constraint, inefficiency, system access requests, or any combination thereof, the Board must then assess, in the second stage, whether enhancement or expansion measures proposed by AESO are reasonable and in the public interest.[1]

[1] Alberta Energy and Utilities Board Decision 2004-087: Alberta Electric System Operator Needs Identification Document – Southwest Alberta 240-kV Transmission System Development Pincher Creek – Lethbridge Area, Addendum to Decision 2004-075, Application 1340849, October 14, 2004, PDF page 17.

10. Section 38 of the *Transmission Regulation* requires the Commission to have regard for a number of factors when considering whether to approve a NID, and Section 38(e) creates a presumption of correctness in favour of the AESO's assessment of the need, as follows:

> **38** When considering whether to approve a needs identification document under section 34(3) of the Act, the Commission must …
>
> (e) consider the ISO's [Independent System Operator] assessment of the need to be correct unless an interested person satisfies the Commission that
>
> (i) the ISO's assessment of the need is technically deficient, or
>
> (ii) to approve the needs identification document would not be in the public interest.

11. The transmission facility operator (TFO) assigned by the AESO to address the identified need prepares and files the facility application for the Commission's consideration. The Commission may approve or deny the application or approve the application subject to terms or conditions.

12. An application to construct and operate new transmission facilities is made under sections 14 and 15 of the *Hydro and Electric Energy Act*. Section 2 of that act sets out its purposes, which include the provision of economic, orderly and efficient development and operation, in the public interest, of generation and transmission of electric energy in Alberta. Section 17 of the *Alberta Utilities Commission Act* requires the Commission to assess whether approval of a facility application is in the public interest, having regard to the social, economic and environmental effects of the project.

13. The Commission considers that the public interest will be largely met if an application complies with existing regulatory standards, and the project's public benefits outweigh its negative impacts.[2] The Commission must take into account the purposes of the *Hydro and Electric Energy Act* and the *Electric Utilities Act*. The Commission must also determine whether the applicants have met the requirements of Rule 007: *Applications for Power Plants, Substations, Transmission Lines, Industrial System Designations and Hydro Developments* and Rule 012: *Noise Control*. An applicant must obtain all approvals required by other applicable provincial or federal legislation.

14. In the current proceeding, the NID and transmission facilities were proposed in response to a system access service request (SASR) filed by NGTL, requesting to connect its Berland River compressor station to the AIES. The Berland River compressor station is part of NGTL's natural gas transmission pipeline system, which is an interprovincial pipeline system under federal jurisdiction and subject to regulation by the Canada Energy Regulator (CER). The CER approved the expansion of the Berland River compressor station, including NGTL's selection of an electric-drive, as opposed to a gas-power, compressor addition.[3]

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[2] Alberta Energy and Utilities Board Decision 2001-111: EPCOR Generation Inc. and EPCOR Power Development Corporation 490-MW Coal-Fired Power Plant, Application 2001173, December 21, 2001, PDF page 12.

[3] Exhibit 29355-X0119, PDF page 42; CER Filing ID C27795-1.

15. In argument, NGTL suggested that the Commission's decision-making authority over the transmission facility and NID applications may be constrained by the existence of the CER approval, stating that "…the Commission does not have constitutional or statutory authority to revisit the CER's approval with respect to NGTL's expansion project."[4] Similarly, in response to an information request seeking confirmation that the Commission has the authority to approve, approve with conditions, or deny the transmission facility applications, NGTL stated that: "NGTL expects the Commission to act within the limits of its statutory authority, which does not, in NGTL's view, include authority to second-guess a decision or order of the Commission of the Canada Energy Regulator (CER) and/or deny the applications currently before it on the basis of whether NGTL should have selected an electric motor-drive (EMD) unit (creating the need for transmission to power the compressor station) or alternatively, a gas motor-drive unit in designing its Project."[5] NGTL noted that the approved design of the Berland River compressor station requires a connection to the AIES, and that construction based on that design is already underway.

16. NGTL stated that "the evidence before the CER specifically included evidence about the environmental effects of a transmission line that would be required to connect the Berland River Compressor Station to the AIES, and this transmission line was included in the cumulative effects assessment that informed the CER's decision."[6] NGTL cited an information request response in which it explained that the connection project was included "as a reasonably foreseeable project" in the Environmental and Socio-economic Assessment submitted to the CER.[7] NGTL also cited the CER's finding that "…[c]onsidering the past, current, and anticipated future developments in the Project area, the Commission also finds that with NGTL's mitigation measures and the conditions of the Order, the Project's contribution to residual cumulative environmental effects is likely to be low."[8]

17. For clarity, the Commission notes that while the CER was aware that the Berland River compressor station would require a transmission interconnection with the AIES, neither the proposed transmission line, nor any conceptual routing for the transmission line, was put before the CER for consideration. The Environmental and Socio-Economic Assessment prepared for the CER application was filed on the record of this proceeding. That document specifically states that, as of the time of its filing with the CER, the transmission line route "has not been defined yet…The width of the permanent ROW [right-of-way], temporary workspace and vegetation control easement required for safe construction and operation of the transmission line are not yet known, as is the size and configuration of the sub-station site."[9] In response to information requests from the Commission, NGTL confirmed that the transmission connection project "was and remains outside of the scope of NGTL's CER-regulated project."[10]

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4 Exhibit 29355-X0353, NGTL GP Ltd. - Written Argument, PDF page 6.
5 Exhibit 29355-X0308, NGTL GP Ltd.'s response to Alberta Utilities Commission Information Request No. 3, PDF page 2.
6 Exhibit 29355-X0353, NGTL GP Ltd. - Written Argument, PDF page 6.
7 Exhibit 29355-X0119, NGTL GP_Response to AUC IR Round 1, PDF page 4.
8 Exhibit 29355-X0149, Response to NGTL-AUC-2025APR02-001 and 002, PDF page 15; Exhibit 29355-X0119, NGTL GP_Response to AUC IR Round 1, PDF page 44.
9 Exhibit 29355-X0150, Attachment NGTL-AUC-2025APR02-002-1_Part 1 of 2, PDF page 224.
10 Exhibit 29355-X0149, Response to NGTL-AUC-2025APR02-001 and 002, PDF page 11.

18. The Commission finds that the intraprovincial transmission facilities are a separate project, applied-for, owned and operated by a provincially regulated entity. The Commission maintains the view that it is obligated to assess whether the construction and operation of the transmission facilities is in the public interest, having regard to the social and economic effects of the transmission facilities, and their effects on the environment.

19. Section 19 of the *Hydro and Electric Energy Act* provides that, on an application for an approval, permit or licence for a transmission line, the Commission may grant the approval, permit or licence subject to any terms and conditions that it prescribes or may deny the application. NGTL confirmed that it did not intend to challenge the validity or applicability of the *Hydro and Electric Energy Act* in this proceeding.[11] Section 34(3) of the *Transmission Regulation* allows the Commission to, subject to the regulations, approve a NID, refer the NID back to the AESO, or refuse to approve the NID. Notwithstanding the existence of a CER approval for the Berland River Compressor Station C3 Unit Addition Project, the Commission confirms that it retains the authority to:

- approve, approve with conditions, or deny the transmission facility applications, and
- approve the NID, refer the NID back to the AESO, or refuse to approve the NID.

20. In these circumstances, if NGTL elected to start construction of the unit addition before a determination had been made to approve the separately regulated transmission facilities, it did so at its own risk.

21. Finally, the Commission notes that NGTL's argument suggests that the Commission has missed the 180-day statutory deadline to issue its decision on a NID or transmission facility application. NGTL makes this argument with reference to the time that has lapsed since the date on which the applications were initially filed. The Commission reviews all applications it receives to ensure regulatory compliance and completeness and asks information requests to clarify applications as necessary. For the purpose of the statutory deadline, the Commission considers an application to be complete only after the information provided by the applicant satisfies all of the Commission's information requirements.

4 The Alberta Electric System Operator's NID application

22. The AESO prepared its NID application in response to a SASR from NGTL requesting to connect the Berland River compressor station to the AIES, and for a new Rate Demand Transmission Service (DTS) contract capacity of 37 megawatts (MW).

23. Under Section 29 of the *Electric Utilities Act*, the AESO must provide system access service "in a manner that gives all electricity market participants wishing to exchange electric energy and ancillary services a reasonable opportunity to do so."

24. Because of the remote location of the Berland River compressor station, any solution to connect the compressor station to the AIES would require the construction of a significant length of new transmission line through Crown land. The AESO identified its preferred solution, and

[11] Exhibit 29355-X0308, NGTL GP Ltd.'s response to Alberta Utilities Commission Information Request No. 3, PDF page 2.

discussed 12 other 138-kV alternatives that it ruled out for various reasons including protection and control issues, transmission facility capacity issues, greater environmental impacts (caribou range, major river crossings, topography constraints), greater pipeline infrastructure impacts, and increased transmission development and cost.

25. The AESO confirmed that it preliminarily explored two 69-kV transmission options; however, these were not assessed further due to significant scope, complexity and technical limitations. The AESO, with the help of AltaLink, determined that these 69-kV transmission options were significantly technically inferior compared to the 138-kV options and not technically viable. Therefore, no further evaluation of cost, environmental or Indigenous impacts of the 69-kV options was warranted.[12]

26. In an information request (IR), the Commission asked whether the AESO assesses environmental and land impacts when carrying out its obligation to provide a market participant with a reasonable opportunity to exchange electricity. As part of this IR, the Commission inquired whether the AESO considered itself obligated to provide a system access solution no matter the associated environmental and land impacts. The AESO responded that it considers environmental and land impacts when determining the preferred connection alternative from a variety of potential transmission connection options and configurations. The AESO explained that it does not conduct its own environmental and land impact assessments when considering its alternatives and instead relies on information provided to it by the TFO, in this case AltaLink.[13] The AESO did not directly address the Commission's question of whether there is a point at which environmental and land impacts would render a system access solution unreasonable, but did indicate that it was not aware of any instances in the past where the AESO was unable to select any of the considered transmission connections alternatives due to environmental or land impacts.[14]

27. In a subsequent IR response, the AESO clarified that while factors such as environmental, economic or other impacts guide the selection of the preferred connection alternative, they do not influence the AESO's obligation to provide access to a market participant that has submitted a SASR.[15]

28. With respect to the meaning of the term "reasonable opportunity," under Section 29 of the *Electric Utilities Act*, the AESO stated that it takes guidance from the Commission's interpretation of reasonable opportunity which, in the AESO's view, limits it to considerations of safety and reliability. In support of this position, the AESO relied on Decision 2013-025, in which the Commission adjudicated an objection to an ISO rule. The Commission commented in that decision that "a reasonable opportunity for system access service constitutes non-discriminatory access and equal treatment of market participants, subject to RAS [remedial action scheme] requirements for maintaining the safety and reliability of the AIES."[16]

[12] Exhibit 29355-X0115, AESO-AUC-2025FEB28-001 to 004, PDF pages 3-4.
[13] Exhibit 29355-X0084, AESO-AUC-2025JAN24-001 to 004.docx, PDF page 8.
[14] Exhibit 29355-X0084, AESO-AUC-2025JAN24-001 to 004.docx, PDF pages 8-9.
[15] Exhibit 29355-X0326.02, AESO-AUC-2025AUG21-001 to 003.docx, PDF page 2.
[16] Decision 2013-025: Alberta Electric System Operator – Objections to ISO rules Section 203.6. Available Transfer Capability and Transfer Path Management, Application Nos. 1607958, 1607986, 1607987, 1607988, 1607993 and 1608013, Proceeding 1633, PDF page 24, paragraph 92.

29. Section 34(1) of the *Electric Utilities Act* states that where the AESO determines that an expansion or enhancement may be required to meet the needs of Alberta and is in the public interest, the AESO must prepare a NID application. The Commission also asked the AESO whether it considers potential impacts to Aboriginal and treaty rights and cumulative effects when making this public interest determination.

30. The AESO responded that it considers several factors as part of its public interest mandate under Section 34(1) of the *Electric Utilities Act.* This includes feedback obtained from the AESO's participant involvement program which, as set out in AUC Rule 007 Appendix A2 - *Independent System Operator (ISO) participant involvement program guidelines*, requires the AESO to notify stakeholder and Indigenous groups. The AESO relied on the TFO to complete certain components of the participant involvement program, including notifying Indigenous groups regarding the application. The AESO instructed the TFO to direct any inquiries related to AESO's assessment of the need to the AESO, and that no concerns were communicated directly to the AESO by any Indigenous groups before or after the NID application was filed.[17]

31. The AESO also stated that there is no statutory requirement for the AESO to assess cumulative effects when determining whether an expansion or enhancement of the capability of the transmission system is in the public interest, and Rule 007 does not require a cumulative effects assessment for need or transmission facility applications.[18]

32. In the circumstances of this application, the Commission finds that the NID application includes all the information required by the *Electric Utilities Act*, the *Transmission Regulation* and Rule 007. No party claimed or demonstrated that the AESO's assessment of the need to provide system access service is technically deficient or that approval of the NID application is not in the public interest. The Commission therefore considers the AESO's assessment of the need to be correct, in accordance with Section 38(e) of the *Transmission Regulation*, and approves the AESO's NID application.

33. With respect to the AESO's obligation to provide system access service generally, the Commission notes that the comments in Decision 2013-025 were made in relation to arguments about differential treatment of interties and generators, in reaching a conclusion that the "reasonable opportunity" to exchange electric energy applies equally to generators and interties.

34. The Commission does not consider that Decision 2013-025 is directly applicable to the context of this proceeding, or that it supports a conclusion that a "reasonable opportunity" to exchange electric energy in response to a SASR is necessarily limited only by considerations of system safety and reliability. The Commission notes that the AESO's statutory obligation to prepare a NID in response to a SASR is contingent on the AESO determining that "an expansion or enhancement of the capability of the transmission system is or may be required to meet the needs of Alberta and is in the public interest…" [emphasis added].[19]

35. The Commission further notes that there is a statutory presumption that the AESO's assessment of the need underpinning a NID is correct, subject to an interested person satisfying the Commission that the assessment of the need is technically deficient or that to approve the NID would not be in the public interest. This statutory presumption extends not just to the AESO's

[17] Exhibit 29355-X0326.02, AESO-AUC-2025AUG21-001 to 003.docx, PDF pages 5-6.
[18] Exhibit 29355-X0326.02, AESO-AUC-2025AUG21-001 to 003.docx, PDF pages 6-7.
[19] *Electric Utilities Act*, SA 2003, c E-5.1, Section 34(1).

identification of a preferred solution, but to its overall assessment that an expansion or enhancement to the capability of the AIES is warranted. In the Commission's view, the statutory presumption provided to the AESO in assessing the need for a transmission expansion or enhancement is predicated on the AESO exercising discretion to determine that meeting the SASR is in the overall public interest. Depending on the circumstances, the Commission considers that this may require the AESO to consider factors beyond system safety and reliability.

5 AltaLink Management Ltd.'s facility applications

36. To meet the need identified in the AESO's application, AltaLink requested approval of the following activities, for the facilities depicted in Figure 1:

- Construct and operate a new 138-kV substation, designated as Berland River 1182S Substation.
- Construct and operate a new 138-kV switching station, designated as Pine Creek 328S Substation.
- Construct and operate approximately 59.3 kilometres of 138-kV transmission line, designated as Transmission Line 620L, which would connect the Berland River 1182S Substation to the Pine Creek 328S Substation.
- Alter the existing Transmission Line 685L to an in-and-out configuration at the proposed Pine Creek 328S Substation. Transmission Line 685L would be split into two creating Transmission Line 685L, between Deer Hill 1012S and Pine Creek 328S substations, and Transmission Line 614L, between Pine Creek 328S and Benbow 397S substations.
- Modify a short segment of the existing Transmission Line 685L from an overhead shield wire to an overhead fibre optic cable.
- Install a new 138-kV circuit breaker and associated equipment at the existing Benbow 397S Substation.
- Re-route a short section of the existing Transmission Line 714L to a new termination circuit breaker at the existing Benbow 397S Substation.

37. The proposed facilities are located approximately 25 kilometres south of Fox Creek in the Municipal District of Greenview No. 16, Yellowhead County and Woodlands County. Transmission Line 620L will be constructed using a combination of single-pole and two-pole H-frame tangent structures. Multi-pole angle and dead-end structures will be required at heavier angles, at dead-end locations and to span the Athabasca River. Structure heights will generally range from approximately 14 to 40 metres, with most structures expected to fall within this range, although taller structures may be required in localized areas depending on terrain and site conditions.

38. AltaLink conducted a participant involvement program in accordance with Rule 007. Thirteen Indigenous groups were consulted by AltaLink. Three Indigenous groups intervened in this proceeding, but each subsequently withdrew their intervention, with Driftpile and SRFN expressing support for approval of the project and LSAMCA confirming that it has no objection

to the project. As a result, there are no outstanding objections to the project from any Indigenous group or other intervener before the Commission. AltaLink reported no concerns from the Municipal District of Greenview No. 16, Woodlands County or Yellowhead County.

39. AltaLink estimated that the cost for the project using the preferred route would be $93,928,789 or $102,347,710 for the alternate route. The AESO confirmed that this project qualifies for a local investment, in the amount of $18,676,500.[20] NGTL is responsible for the cost of the project minus the local investment, which is an estimated $75,252,289 to NGTL for the preferred route.[21] NGTL estimated that it would pay $8,050,000 annually in transmission service charges based on its expected Rate DTS contract capacity of 37 MW.[22] The scheduled in-service date for the project is May 6, 2026.

40. In the following sections, the Commission assesses whether approval of the facility applications is in the public interest, having regard for the social and economic effects of the project and its effects on the environment. The Commission begins by assessing the environmental effects of the project, and whether these effects are acceptable taking into consideration the mitigations proposed by AltaLink.

41. The Commission next addresses the project's potential effects to Aboriginal and treaty rights. In this section, the Commission discusses the consultation with Indigenous groups that took place in relation to the project and concludes that this consultation was adequate.

42. The Commission then compares the preferred and alternate transmission line routes proposed by AltaLink. The Commission sets out its reasons for determining that the preferred route is in the public interest, including the preferred route's lower environmental impacts relative to the alternative route, given its location along major existing linear disturbances and with regard to its impact on environmental features.

43. Finally, the Commission concludes by setting out why approval of the project along the preferred route is in the public interest, having regard to the social and economic effects of the project and its effects on the environment.

5.1 What are the project's risks to the environment and the proposed mitigations?

44. In this section, the Commission discusses the project's impacts to the environment, including in the context of the cumulative environmental impacts of development in the region.

45. The project is located on provincial Crown land in a region of the province with a high amount of sensitive environmental habitat. Construction of the project will require the clearing of vegetation from native wetland and forested habitats and the installation of two high-voltage substations and an approximately 59-kilometre transmission line. Project maintenance will require ongoing vegetation clearing throughout the life of the project.

46. The quality of habitat, and the length of the route, mean that construction and operation of the project, with either the preferred or alternate route proposed by AltaLink, have the potential

[20] Exhibit 29355-X0084, AESO-AUC-2025JAN24-001 to 004.docx, PDF page 2. The local investment is a cost to ratepayers as contemplated in the ISO Tariff – Section 4, sections 4.6 and 4.7.
[21] Exhibit 29355-X0084, AESO-AUC-2025JAN24-001 to 004.docx, PDF page 6.
[22] Exhibit 29355-X0119, NGTL GP_Response to AUC IR Round 1, PDF page 4.

for considerable environmental impacts in both the short and long term.[23] Short-term effects from construction activities may include sedimentation of waterbodies, and temporary disturbance to vegetation and wildlife. Long-term effects may include the introduction and spread of non-native vegetation, reductions and alterations to wildlife habitat including species of management concern, and potential soil impacts from travel activities within the right-of-way (ROW).

47. Because a major environmental impact of the project is the tree-clearing required for the ROW for construction and operation of the Transmission Line 620L, the Commission first addresses whether the size of the ROW and vegetation control easements proposed by AltaLink are reasonable and justified. The Commission then provides its overall findings on whether the environmental effects of the project have been mitigated to an acceptable degree.

5.1.1 Are the proposed right-of-way and vegetation control easement reasonable?

48. AltaLink requested a 30-metre ROW for Transmission Line 620L, with localized widening beyond 30 metres where longer spans or site-specific conditions require it. AltaLink also identified 100-metre stringing areas that form part of the ROW. In addition, AltaLink stated that at some angle and dead-end structures, additional ROW up to 30 metres from the structure would be required for guy anchors. AltaLink further requested a vegetation control easement (VCE) with a typical width of 20 metres beyond the ROW to allow removal of trees outside the ROW that have the potential risk to impact the safe operation of the transmission line (danger trees).

49. Stantec Consulting Ltd., on behalf of AltaLink, explained that, in general, clearing will proceed as follows: the ROW and VCE will be surveyed and staked or ribboned; merchantable trees within the ROW will be felled, delimbed, decked and hauled to local mills; and unmerchantable cleared material within the ROW will be piled for burning or mulched on site. Tree removal within the VCE is selective and only individual danger trees will be cleared.

50. AltaLink explained that ROW width is determined by a number of factors including size and type of structure, conductor swing and the span lengths between structures in order to meet safe clearances. Transmission Line 620L will primarily use H-frame structures to accommodate the changing topography of the area, which contributes to the need for a wider ROW. It provided an example where the ROW widens to 51 metres across a ravine before tapering back to 30 metres and confirmed that clearing in the widened section would be selective and limited to what is required for line clearance. It stated that there is no flexibility to reduce the width of the ROW.[24]

51. AltaLink also stated that in locations where a narrow strip of trees would otherwise remain between the ROW and a land disposition for a neighbouring facility, such as a roadway or pipeline, its application to the Commission included a request to acquire that strip as ROW. In these areas of wider applied-for ROW, only danger trees would be removed. AltaLink further stated that the VCE was identified using LiDAR analysis of tree heights and that clearing within the VCE would be selective and limited to danger trees.

52. The Commission finds that the ROW and VCE proposed for Transmission Line 620L are reasonable. The Commission accepts AltaLink's evidence that a 30-metre ROW is typical, and that localized widening is required in some locations for conductor swing, span length, and

[23] Exhibit 29355-X0037, Appendix TS24 Environmental Evaluation Part 1, PDF pages 32 and 33.
[24] Exhibit 29355-X0347, AML-AUC-2025SEP05-001 to 003, PDF page 4.

site-specific conditions. The Commission is satisfied that clearing in widened sections will be limited to what is necessary for safe transmission line operation. The Commission also accepts that a 20-metre VCE is required to address danger trees outside the ROW that could pose a hazard and is satisfied with AltaLink's commitment that clearing in the VCE will be selective and based on LiDAR analysis of tree heights.

5.1.2 Have the environmental impacts been mitigated to an acceptable degree?

53. Constructing the project, and in particular this length of new transmission line, will have adverse environmental impacts. The Commission is satisfied, however, that the mitigations proposed by AltaLink reduce these impacts to the most reasonable extent.

54. To reduce the severity of environmental impacts, AltaLink has committed to a series of mitigations, most notably, the cleaning of equipment to reduce introduction of diseases and non-native vegetation, vegetation control using mechanical methods, the use of low-impact travel methods (e.g., access mats), the use of erosion and sediment control methods, adherence to restricted activity periods for key sensitive species, leaving line compatible vegetation where possible, demarcation and restricted travel for key sensitive areas, the use of qualified environmental field monitors, and detailed record keeping.[25]

55. Although the Commission finds the overall environmental effects of the project to be mitigated to an acceptable degree, the Commission is cognizant that the project will contribute to the cumulative environmental impacts from development in the region. All three Indigenous groups raised concerns about cumulative effects and impacts of industrial development on their rights and way of life. To support their position Driftpile provided an analysis of the cumulative environmental impacts to their traditional lands. This analysis showed how their traditional lands had changed over an approximately 75-year period, with approximately 65 per cent of lands being within 250 metres of industrial disturbance. Similar evidence was filed for the project area and its surrounding lands, in support of Driftpile's position that these cumulative effects are pervasive in the region.[26] While Driftpile's withdrawal from the proceeding means this evidence is now unsponsored, the Commission has taken note of it for purposes of its analysis of environmental impacts.

56. The Commission recognizes that transmission lines and the potential for further future buildout of electricity infrastructure contribute to cumulative impacts. Based on the evidence presented on the level of cumulative impacts in this region and on lands First Nations and Métis hold important to their way of life, the Commission emphasizes its expectation that proponents proposing projects in areas with significant cumulative impacts:

- Make a demonstrable and extensive effort to follow best siting principles (e.g., following existing linear disturbances) for the reduction of habitat fragmentation.

[25] Exhibit 29355-X0039, Appendix TS26 Environmental Protection Plan; and Exhibit 29355-X0310, AML TCE Berland River Transmission Connection - List of Commitments.

[26] Exhibit 29355-X0161, Appendix B_AltaLink – Berland River Transmission_ Driftpile Cree Nation Cumulative Effects Addendum.

- Be thorough and considerate of all project-related impacts, including primary, secondary and tertiary impacts[27] when proposing mitigations and ensure that such mitigations are well focused on project-specific impacts on the environment.

- Be apprised of developments from environmental working groups (e.g., caribou habitat restoration working groups) with the aim of addressing cumulative impacts in the regions where projects are proposed.

57. The Commission finds that monitoring and oversight of the project is necessary to reduce environmental effects and is beneficial for AltaLink, Indigenous groups, and stakeholders. AltaLink's commitments that will assist with monitoring and oversight of the project include engaging with parties that are interested in reviewing and providing input on the project-specific environmental protection plan. AltaLink also made a number of specific commitments to Indigenous groups including remaining engaged with Indigenous groups throughout project development, supporting Indigenous groups in conducting cumulative effects assessments, offering capacity for Indigenous groups to participate in a pre-disturbance assessment, and implementing an Indigenous monitoring program.

58. The Commission's expectation is that AltaLink will strictly adhere to all of its environmental commitments and mitigations,[28] including those made to address the concerns of Driftpile, SRFN and LSAMCA prior to the withdrawal of these groups from the proceeding.

59. The Commission also finds that an important part of reducing environmental effects of the project is through appropriate routing. The Commission assesses the relative environmental effects when comparing the preferred and alternate routes in Section 5.3 but in general finds that AltaLink's attempts to parallel existing linear disturbances for both routes is an important factor in reducing the environmental effects of the project.

60. For the above reasons, the Commission finds that the mitigation measures proposed, and related commitments made by AltaLink are reasonable and that these will mitigate the environmental effects of the project to the extent practicable. Nonetheless, the Commission recognizes that the project will still have adverse effects on the environment and weighs whether these effects are in the public interest in Section 5.4.

5.2 How does the project impact Aboriginal and treaty rights?

61. The Commission has the authority to consider and address potential adverse impacts to Aboriginal and treaty rights as set out in Section 35 of the *Constitution Act*, 1982 when deciding whether approval of a project is in the public interest. This includes determining whether the duty to consult potentially affected Indigenous groups is triggered and satisfied.

62. The duty to consult is triggered when the Crown has real or constructive knowledge of the potential existence of an Aboriginal right or title and contemplates conduct that might

[27] Primary impacts refer to direct impacts which occur as a result of the project (e.g., tree clearing), secondary impacts refer to the indirect impacts which occur due to primary impacts (e.g., habitat alteration, increased human access), tertiary impacts refer to broader impacts which occur due to the former (e.g., wildlife population declines).

[28] Exhibit 29355-X0037, Appendix TS24 Environmental Evaluation Part 1; Exhibit 29355-X0039, Appendix TS26 Environmental Protection Plan; and Exhibit 29355-X0310, AML TCE Berland River Transmission Connection - List of Commitments.

adversely affect it. The Commission is not the Crown or an agent of the Crown. However, the Commission is the final decision-maker for applications to construct and operate electric transmission facilities in Alberta. This type of decision may trigger the duty to consult.

63. The scope of the duty to consult is based on a preliminary assessment of the strength of the claim or right asserted and the extent of the alleged infringement. Where the perceived breach is less serious or relatively minor, the content of the duty will be at the lower end of the spectrum, for example, mere notice may be sufficient. If a strong prima facie case for the claim is established and the potential infringement is of higher significance, deep consultation that is aimed at finding a satisfactory solution may be required; however, the duty to consult does not confer a veto power on Aboriginal groups.[29]

64. Where the duty to consult is triggered, the Crown may rely on steps undertaken by a regulatory agency to fulfil the duty, provided that the regulatory agency has the necessary statutory powers and duties to provide an appropriate level of consultation and, where required, accommodation. Under its constating legislation, the Commission has broad powers that enable it to require applicants to notify or consult with potentially affected stakeholders, to hold hearings, to order the production of information, to impose conditions on applicants, and to provide participant funding. For these reasons, the government of Alberta has confirmed that where the duty to consult is triggered by an application before the Commission, the government of Alberta will rely on the Commission's process to address potential impacts to Aboriginal and treaty rights. The Commission is committed to ensuring that its processes and decisions uphold Section 35 of the *Constitution Act*, 1982.

65. The AUC's consultation process for Indigenous groups includes: (1) pre-application engagement by proponents, (2) AUC's notice of application and the opportunity for Indigenous groups to self-identify if they consider their rights may be directly and adversely affected, and (3) public hearings in accordance with Section 9 of the *Alberta Utilities Commission Act*.

66. The sections below include a summary of the Indigenous consultation that took place with respect to this proceeding, and the Commissions findings on the adequacy of consultation.

5.2.1 Was consultation with Indigenous groups adequate?

67. AltaLink engaged with 13 Indigenous groups prior to filing its applications with the AUC: Alexander First Nation, Alexis Nakota Sioux Nation, Aseniwuche Winewak Nation, Driftpile Cree Nation, East Prairie Métis Settlement, Enoch Cree Nation, Kehewin Cree Nation, Paul First Nation, Sturgeon Lake Cree Nation, Sucker Creek First Nation, Swan River First Nation (SRFN), Whitefish (Goodfish) Lake First Nation, and LSAMCA. AltaLink held meetings, provided funding for traditional land use studies, and several nations conducted site visits to the proposed project site. AltaLink provided a summary of the consultation that began in July 2023, the concerns raised by the Indigenous groups and its response to those concerns.[30]

68. The AUC provided notice to the 13 Indigenous groups about the applications on November 13, 2024, and again on February 25, 2025.

[29] *Haida Nation v. British Columbia (Minister of Forests)*, 2004 SCC 73; *Chippewas of the Thames First Nation v. Enbridge Pipelines Inc.,* 2017 SCC 41; *Clyde River (Hamlet) v. Petroleum Geo-Services Inc.*, 2017 SCC 40.

[30] Exhibit 29355-X0051, Appendix TS36 Project Concerns.

69. Driftpile, SRFN and LSAMCA each filed statements of intent to participate in the AUC proceeding. In their respective statements of intent to participate, these groups identified concerns about potential impacts of the project on their Section 35 rights and way of life, including concerns related to the effects of the project on the environment. The Commission granted each group standing with full participation rights including access to participant funding so that any potential impacts to Aboriginal or treaty rights stemming from the project could be understood and addressed. All three groups submitted written evidence.

70. In its notice of hearing, the Commission indicated that it was interested in whether the Indigenous groups anticipated having Elders, Knowledge Holders or community members provide oral evidence to the Commission, and if so whether there were cultural protocols that should be followed or accommodations that would help them feel more comfortable. In response, Driftpile requested that the Commission hold an in-person Oral Indigenous Knowledge (OIK) session separately from the virtual oral hearing. SRFN also indicated interest in participating in an OIK session. LSAMCA declined to have an OIK session, indicating that LSAMCA members planned to provide their evidence at the virtual oral hearing instead.

71. In May 2025, the Commission held OIK sessions with Driftpile and SRFN in their respective communities. These sessions were organized in collaboration with the First Nation's consultation co-ordinators who also facilitated the sessions. Representatives from the AESO and AltaLink attended the OIK sessions.

72. The members of the Commission panel appreciated the opportunity to hear directly from the Driftpile and SRFN leadership and Elders, Knowledge Holders and community members during the OIK sessions. The panel found it helpful to learn more about the Nations, their history, and connection to the land, as well as their concerns about the environment and how the project may adversely affect their harvesting and traditional land use. The panel is grateful for the opportunity and thank Driftpile and SRFN for welcoming us into their communities.

73. The Commission considers consultation with the Indigenous groups is adequate and meets the requirements of Rule 007. Indigenous groups had sufficient time and opportunity to learn about the project, raise concerns, gather evidence (traditional land use and other studies) and explore mitigation. After participating actively in the proceeding, Driftpile and SRFN submitted letters of support for the project and LSAMCA provided a letter of non-objection to the Commission.

74. The Commission also considers that AltaLink's commitments were responsive to the concerns raised by the Indigenous groups who participated in the proceeding.[31, 32] Among other commitments, AltaLink has committed to consult throughout the life cycle of the project, identify and protect culturally significant sites, and establish an Indigenous monitoring program. AltaLink also committed to not using herbicides during construction or maintenance of the transmission line right-of-way and instead utilize mechanical methods where needed.[33] This commitment helped address a primary concern of the Indigenous groups about habitat loss and contamination. The Commission expects that AltaLink will follow through on the commitments made during the participant involvement program and the proceeding process.

[31] Exhibit 29355-X0051, Appendix TS36 Project Concerns.
[32] Exhibit 29355-X0310, AML TCE Berland River Transmission Connection -List of Commitments.
[33] Exhibit 29355-X0347, AML-AUC-2025SEP05-001 to 003, PDF pages 6-7.

75. Driftpile, SRFN and LSAMCA have each withdrawn their statements of intent to participate in this proceeding. The Commission understands this to mean that the concerns articulated in their respective statements of intent to participate have been addressed to their satisfaction, and that these groups are no longer requesting or relying on the Commission to address those concerns. The Commission respects the ability of these Indigenous groups to determine for themselves that their concerns have been adequately addressed by the applicant.

5.3 How do the preferred and alternate routes compare?

76. AltaLink explained that it used a four-stage siting process consisting of conceptual, preliminary, detailed and final stages to identify, refine and select potential routes for Transmission Line 620L. The process was based on a review of existing environmental and land use data and on feedback received through its participant involvement program.

77. A key principle in AltaLink's approach was to parallel existing linear features such as roads, pipelines and transmission lines to reduce new disturbance. AltaLink described this as a best practice in the Green Area[34] and stated that this practice is consistent with Section 15.1(2) of the *Transmission Regulation*, which requires maximizing the efficient use of rights-of-way and corridors.

78. AltaLink applied land use constraints by identifying "no go" and "avoidance" areas, including airports, oil and gas sites, wetlands, Key Wildlife and Biodiversity Zones and grizzly bear range. By applying these criteria, AltaLink eliminated infeasible routes and narrowed its study to two complete alignments: the preferred route and the alternate route.

79. The preferred route is approximately 59.3 kilometres, and the alternate route is approximately 57.0 kilometres. While the alternate is slightly shorter, the preferred route parallels existing roads, such as the ANC haul road and for substantially greater length, and intersects fewer wetlands, Key Wildlife and Biodiversity Zones and environmentally sensitive areas.

Table 1. Comparison of the preferred route and alternate route[35]

Metric	Preferred Route	Alternate Route
Total length (km)	59.3	57.0
Within 100 m of roads (km)	43.8	19.1
Within 100 m of non-road linears (km)	11.9	35.1
Watercourse crossings	35	32
Critical fish habitat crossings	11	11
Wetlands intersected (km)	14.5	19.0
Key Wildlife and Biodiversity Zones intersected (km)	6.4	15.2
Environmentally sensitive areas (km)	7.9	9.0
Pipeline crossings	93	79
Aggregate dispositions (km)	0.8	1.8
Estimated cost ($ million)	93.9	105.1

[34] Exhibit 29355-X0032, Appendix TS16 Project Maps (Route Determination Report), PDF page 9: "The Green Area is an administrative region of the province, mainly composed of Crown land managed for the timber production and resources."

[35] Exhibit 29355-X0032, Appendix TS16 Project Maps (Route Determination Report), Table 3, PDF page 48.

80. Stantec provided the following comparison on environmental considerations between the preferred and alternate route:[36]

- The preferred route parallels existing disturbances for approximately 49.5 kilometres (83 per cent) of its length, a majority of which is an existing high-grade gravel road, while the alternate route parallels existing disturbances for approximately 50.6 kilometres (89 per cent) of its length. While the preferred route parallels less existing disturbance than the alternate route, this is due to AltaLink complying with a request from Alberta Environment and Protected Areas to set back the transmission line slightly from the high-grade gravel road to leave a treed buffer as a mitigation for grizzly bear collision.

- The existing linear disturbances along the preferred route need less upgrading to access routes, which reduces overall impacts during construction and maintenance.

- The preferred route has less terrain that is steep, which limits erosion risk and is an important consideration for soils, vegetation, and protection of watercourses.

- The preferred route has lower effects on wildlife as it has 33 hectares less footprint, interacts half the area of Key Wildlife and Biodiversity Zones, and spans 36 areas with moderate risks for bird collision compared to 91 such areas for the alternate route.

- The preferred route also avoids a mapped trumpeter swan breeding wetland that would be intersected by the alternate route.

81. Based on the above, Stantec concluded that the preferred route created the lowest risks of environmental impacts between the two options. The Commission finds that the routing proposed followed best environmental practices of siting adjacent to existing disturbances as much as reasonable and takes into consideration the nature of these existing linear disturbances (i.e., the high-grade gravel road versus a revegetated cutline).

82. AltaLink also assessed two combination routes that incorporated segments of both the preferred and alternate routes. These configurations are referred to as the West Preferred and East Alternate and the West Alternate and East Preferred configurations. Based on the comparative metrics,[37] the Commission finds the combination routes did not show a material reduction in environmental effects or other key siting criteria relative to the preferred route.

83. By paralleling roads for most of its length, the preferred route reduces the need for new trail construction, simplifies access for construction and maintenance, and reduces incremental landscape fragmentation. The alternate route, while shorter and with fewer pipeline crossings, would have greater overall environmental effects and higher cost.

84. Stakeholders and agencies generally supported the preferred route. Alberta Transportation and Wapiti Gravel Suppliers supported the preferred route because of lower impacts on aggregate resources. Alberta Environment and Protected Areas supported routing along the ANC haul road and the avoidance of the trumpeter swan breeding site. ANC Timber Ltd. expressed a preference

[36] Exhibit X0037, Appendix TS24 Environmental Evaluation Part 1, PDF pages 3 to 5.
[37] Exhibit 29355-X0032, Appendix TS16 Project Maps (Route Determination Report), PDF page 48: "Table 3 - Comparison of the Preferred, Alternate and Combination Routes."

for the alternate route, but its concerns were addressed through AltaLink's commitment to a master crossing agreement and clearance commitments.

85. The Commission finds the preferred route has lower overall impacts than the alternate route or any combination of the two. In reaching this conclusion, the Commission places weight on the fact that the preferred route parallels existing roads for most of its length, reduces interaction with wetlands and Key Wildlife and Biodiversity Zones relative to the alternate route, avoids the trumpeter swan breeding site, has less impact on aggregate leases and has a lower estimated cost.

5.4 Is the project in the public interest?

86. As discussed earlier, approval of the facility applications is subject to the Commission determining that construction and operation of the project is in the public interest, having regard for the social and economic effects of the project and its effects on the environment. The Commission has previously affirmed that the public interest will be largely met if an application complies with existing regulatory standards, and the project's public benefits outweigh its negative impacts.

87. The Commission is satisfied that the project complies with the applicable acts and regulations. The Commission finds that AltaLink's participant involvement program complies with the requirements of Rule 007. While multiple parties initially intervened in this proceeding to oppose the project, these parties have indicated that their concerns have been addressed to their satisfaction. Therefore, no party objects to the project and both Driftpile and SRFN expressed support for the project.

88. The Commission is also satisfied that the project complies with Rule 012. AltaLink submitted a noise impact assessment (NIA), prepared by Stantec for NGTL, for its application for the Berland River compressor station which included AltaLink's Berland River 1182S Substation.[38] The NIA demonstrates compliance with the permissible sound levels prescribed by Rule 012.[39]

89. The Commission expects AltaLink to obtain all other licences, permits and approvals for the project that are required under any other federal or provincial enactments.

90. For the reasons set out above, the Commission has determined that the consultation that occurred with Indigenous groups in relation to potential impacts to Aboriginal and treaty rights was sufficient to discharge the duty to consult. In making this determination, the Commission places significant weight on the letters of support from Driftpile and SRFN and on the letter of non-objection from LSAMCA.

91. The Commission found that while the project will have adverse environmental impacts, the mitigation measures and commitments made by AltaLink are expected to reasonably mitigate the impacts. The residual environmental impacts are a negative consideration that must be weighed against the public benefits of the project.

[38] Exhibit 29355-X0040, Appendix TS28 Noise Impact Assessment; Exhibit 29355-X0015, AML TCE Berland River Transmission Connection D.0899 – Application, PDF page 29.

[39] Exhibit 29355-X0073, AML IR Responses to AUC (001-005), PDF page 10.

92. The Commission also considers the economic and social effects of the project. NGTL supported the applications, noting that the addition of an electric-driven compressor unit at the Berland River compressor station is part of a system expansion project that would facilitate roughly 1 billion cubic feet per day of incremental natural gas throughput. NGTL filed 23 letters of comment from its customers supporting the need for the system expansion project and the timely approval of the related electric transmission facilities. The Commission recognizes that approval of the applications would support the expansion of the NGTL's system and the resulting economic benefits.

93. In addition, the Commission notes that $75,252,289 of the total project costs will be borne by NGTL and that NGTL will further contribute to electric system costs through the payment of annual Rate DTS transmission charges totalling approximately $8,050,000.

94. With respect to potential economic and social effects to Indigenous groups, AltaLink has committed to engage Indigenous groups in environmental monitoring, pre-construction notifications, harvesting opportunities and in relation to other economic benefits, should the project be approved. AltaLink also stated that it has contracts in place with Indigenous groups for the construction of the project.

95. Based on the foregoing, and pursuant to Section 17 of the *Alberta Utilities Commission Act*, the Commission finds that the applications, including AltaLink's preferred route, are in the public interest. In so finding, the Commission considers that the negative environmental impacts of the project are outweighed by its social and economic benefits to Albertans.

6 Decision

96. Pursuant to Section 34 of the *Electric Utilities Act*, the Commission approves the need outlined in Needs Identification Document Application 29355-A001 and grants the Alberta Electric System Operator the approval set out in Appendix 1 – Needs Identification Document Approval 29355-D02-2025.

97. Pursuant to sections 14, 15 and 19 of the *Hydro and Electric Energy Act*, the Commission approves Applications 29355-A002 to 29355-A008 and grants AltaLink Management Ltd. the following approvals:

- Appendix 2 – Transmission Line Permit and Licence 29355-D03-2025 to alter and operate Transmission Line 685L.
- Appendix 3 – Substation Permit and Licence 29355-D04-2025 to construct and operate the Berland River 1182S Substation.
- Appendix 4 – Substation Permit and Licence 29355-D05-2025 to construct and operate the Pine Creek 328S Substation.
- Appendix 5 – Transmission Line Permit and Licence 29355-D06-2025 to construct and operate Transmission Line 620L.
- Appendix 6 – Transmission Line Permit and Licence 29355-D07-2025 to construct and operate Transmission Line 614L.

- Appendix 7 – Transmission Line Permit and Licence 29355-D08-2025 to alter and operate Benbow 397S Substation.

- Appendix 8 – Transmission Line Permit and Licence 29355-D09-2025 to alter and operate Transmission Line 714L.

98. The appendixes will be distributed separately.

99. AltaLink also requested a connection order to connect AltaLink's Berland River 1182S Substation to NGTL's distribution system. The Commission does not issue connection orders for connections between transmission electric facilities and distribution electric facilities. Therefore, the Commission declines to consider this request as it finds that a connection order is not required.

Dated on October 15, 2025.

Alberta Utilities Commission

(original signed by)

Kristi Sebalj
Vice-Chair

(original signed by)

Renée Marx
Commission Member

(original signed by)

Michael Arthur
Commission Member