



City of Medicine Hat

East Ring Enhancement Project – Transmission Lines MH-30L and MH-40L Rebuild

August 28, 2025

Alberta Utilities Commission

Decision 29538-D01-2025

City of Medicine Hat

East Ring Enhancement Project – Transmission Lines MH-30L and MH-40L Rebuild

Proceeding 29538

Application 29538-A001

August 28, 2025

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1 Decision summary

1. In this decision, the Alberta Utilities Commission approves an application from the City of Medicine Hat (the City) to decommission, salvage and rebuild approximately 20 kilometres of the existing Transmission Line MH-30L and Transmission Line MH-40L. The Commission finds the Preferred Route proposed by the City to be in the public interest.

2 Background

2. Since 2014, the City has undertaken a phased conversion of its transmission system from a 69-kilovolt (kV) standard to a 138-kV standard to meet increasing load requirements and improve overall system reliability.

3. Phases 1 and 2 of that conversion were comprised of rebuilding transmission lines MH-10L¹ and MH-20L,² respectively. Phase 3 is a multi-part project, referred to as the East Ring Enhancement Project, and is comprised of rebuilding transmission lines MH-30L and MH-40L, and MH-60L.³ Phase 4 involves upgrading Transmission Line MH-50L at a later date.

3 Introduction

4. The City, under Permit and Licence MH 81-17,⁴ is the operator of the 69-kV Transmission Line MH-30L from Southridge MHS-3 Substation⁵ to the city limits in the Medicine Hat area, and under Permit and Licence MH 83-53,⁶ is the operator of the 69-kV Transmission Line MH-40L from NE Crescent Heights MHS-5 Substation⁷ to the city limits in the Medicine Hat area.⁸

5. Transmission lines MH-30L and MH-40L form one single-circuit transmission line between the NE Crescent Heights MHS-5 Substation and the Southridge MHS-3 Substation. The renumbering of Transmission Line MH-30L to Transmission Line MH-40L occurs near the

¹ Decision 2014-112: The City of Medicine Hat – Transmission Line MH-10L Upgrade Project, Proceeding 2987, Application 1610187, April 17, 2014.

² Decision 2014-349: City of Medicine Hat Electric Utility – Transmission Line MH-20L Upgrade Project, Proceeding 3168, Application 1610463, December 17, 2014.

³ Decision 29537-D01-2025: City of Medicine Hat – East Ring Enhancement Project – Transmission Line MH-60L Rebuild, Proceeding 29537, Application 29537-A001, February 19, 2025.

⁴ Transmission Line Permit and Licence MH 81-17, Application 810079, June 15, 1981.

⁵ Previously referred to as MH69S-3 Substation.

⁶ Transmission Line Permit and Licence MH 83-53, Application 830551, August 23, 1983.

⁷ Previously referred to as MH69S-5 Substation.

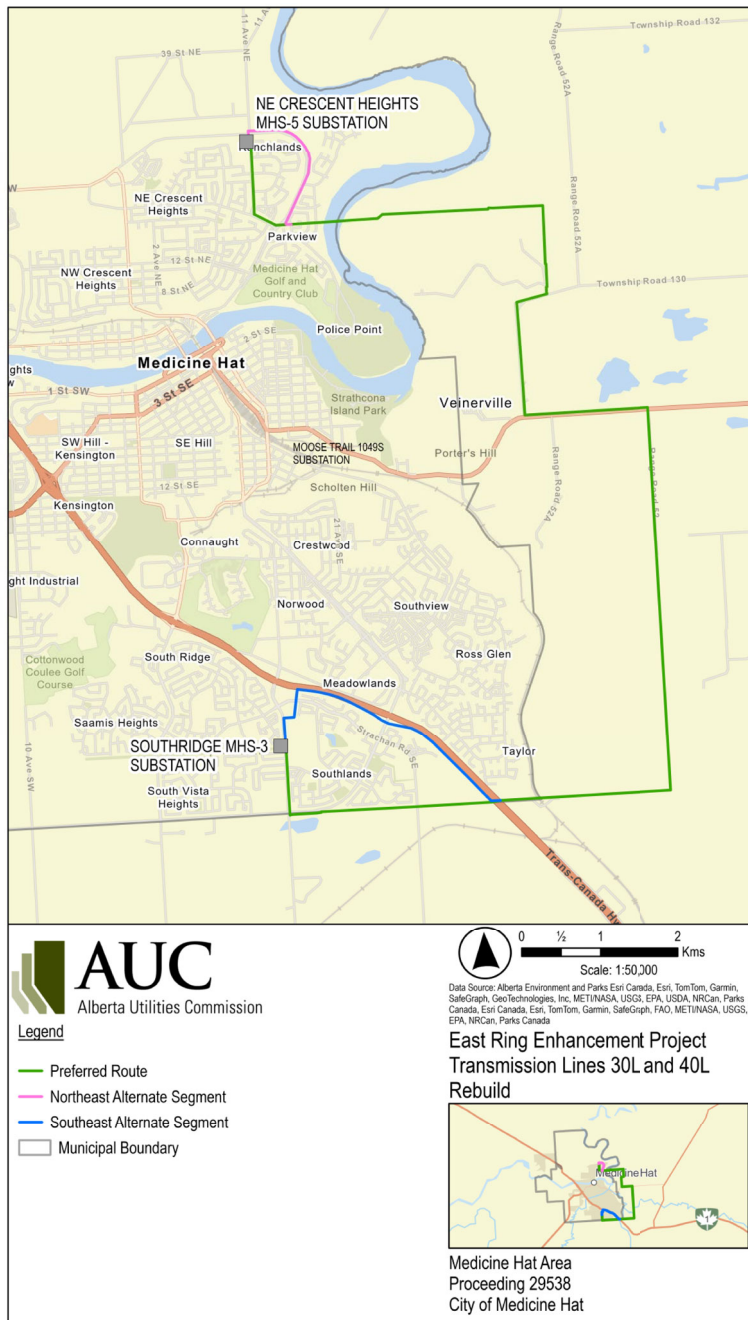
⁸ The city limit boundary was based on the historical city limits in 1981 and does not reflect the present-day boundary.

intersection of Range Road 53 and Highway 41A in Cypress County. The City stated that the renumbering of the transmission lines was due to an expected need for a substation at this location; however, the City advised that a substation at this location was no longer forecasted, and that the City would accept a permit and licence for the entire transmission line to be designated as Transmission Line MH-30L.⁹

6. The City applied to the Commission to rebuild approximately 20 kilometres of Transmission Line MH-30L and Transmission Line MH-40L to a 138-kV standard, while maintaining its initial energization at 69 kV until future system requirements necessitate energization at 138 kV. The project is located within the city of Medicine Hat and Cypress County and the City proposed a Preferred Route and two alternate routes as shown on the map in Figure 1.

⁹ Exhibit 29538-X0075, 29538_Information request - round 1 responses, COMH-AUC-2024NOV21-003(a), PDF page 8; Transcript, Volume 1, page 34, lines 17 to 25 and page 35, lines 1 to 4.

Figure 1. Proposed transmission lines MH-30L and MH-40L rebuild routes

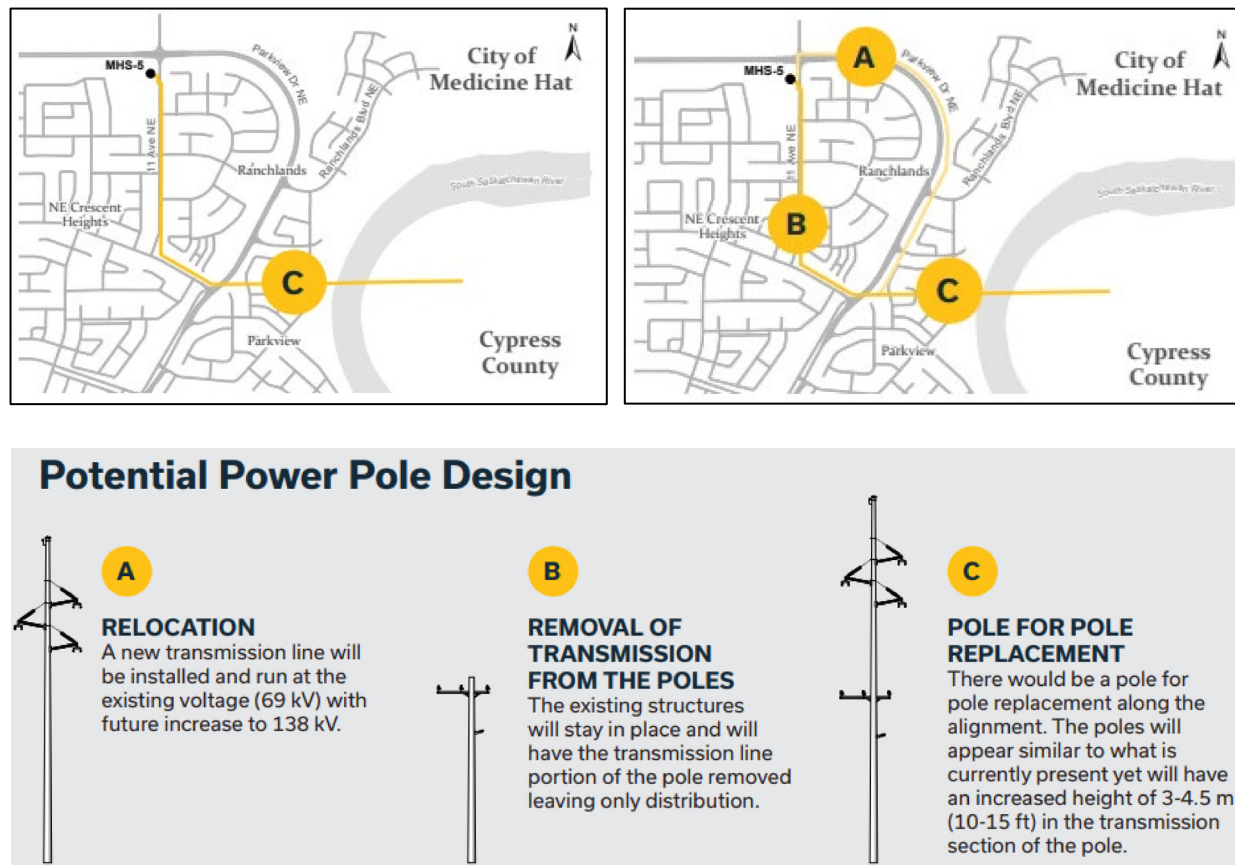


7. The City indicated that the proposed routes were developed through an iterative process. Stakeholders were notified and consulted throughout the route development process. The Preferred Route would follow the existing alignment, which is currently located one metre inside public road allowances (developed and undeveloped) and within existing utility corridors. The two alternate routes, the Northeast Alternate Route and the Southeast Alternate Route, would be located within public road allowances and along property boundaries. All three proposed routes within the City limits are primarily adjacent to residential developments and the portion of the Preferred Route within Cypress County is primarily adjacent to agricultural fields. The City did not propose an alternate route within Cypress County.

8. The proposed rebuild would consist primarily of single-pole wood structures.¹⁰ Existing structure heights range between 17 metres and 26 metres and would be replaced with structures where the height ranges between 15 metres and 31 metres.

9. A 13.8-kV distribution line underbuild is currently co-located on existing transmission lines MH-30L and MH-40L for approximately 13.3 kilometres. As part of the proposed rebuild, the City stated that the existing distribution line is required to stay where it is currently located.¹¹ As a result, the City developed different design configurations for the proposed transmission lines rebuild including maintaining the existing distribution line locations, as shown in figures 2 and 3.

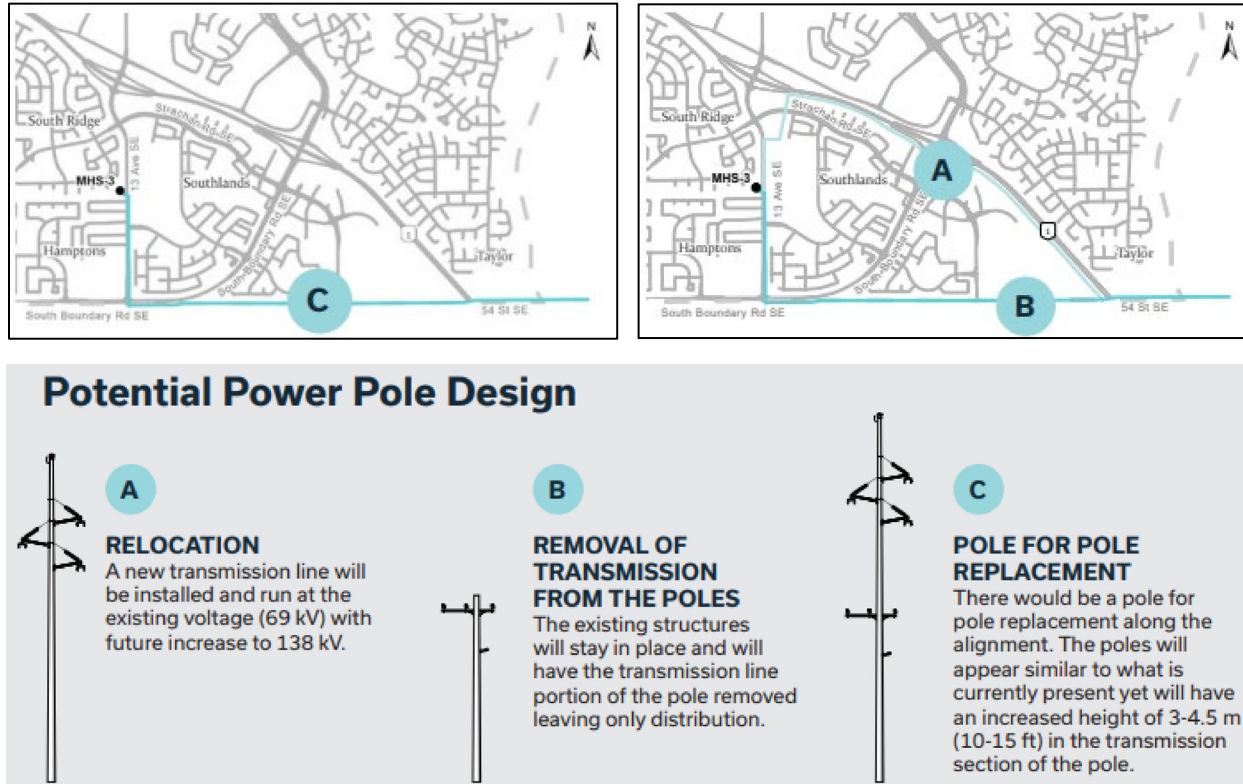
Figure 2. Preferred Route (left) and Northeast Alternate Route (right) structure design configurations¹²



¹⁰ The use of wood two-pole H-frame, multi-pole angle, and dead-end structures may be required due to terrain features and curves along roadways, including steel guy wires and anchors for additional support.

¹¹ Exhibit 29538-X0070, Attachment 7_COMH-AUC-2024Nov20, PDF pages 6-34.

¹² Exhibit 29538-X0029, COMH_EREP_30Land40L_AttachmentO_ParticipantInvolvementProgram, PDF pages 197-198.

Figure 3. Preferred Route (left) and Southeast Alternate Route (right) structure design configurations¹³

10. Configuration A would require the relocation of the transmission line to a new location; Configuration B would require the existing transmission facilities to be removed from the power pole, leaving only the distribution facilities present; and Configuration C would replace the existing transmission line and distribution line structures in a pole-for-pole replacement configuration. The City stated that design configurations A and B would be mutually inclusive to one another and that design Configuration C would exist on its own.

11. As indicated in these design configurations, the City confirmed that relocating the transmission line to the Northeast Alternate Route or Southeast Alternate Route would not fully remove the existing distribution line facilities from their current location.¹⁴ The City stated that by removing the transmission line conductor, hardware and the top of the existing poles, the weight born by the power poles would be significantly lessened and would extend the power poles' safe operating timeframes as a distribution-only line.¹⁵ In other words, if the Northeast Alternate Route and/or the Southeast Alternate Route were approved, the existing transmission line would be relocated to a new location (Configuration A) and the existing distribution line would remain in place with the transmission line facilities removed from the power pole (Configuration B). If the Preferred Route was approved, the existing transmission line with

¹³ Exhibit 29538-X0029, COMH_EREP_30Land40L_AttachmentO_ParticipantInvolvementProgram, PDF page 202.

¹⁴ Exhibit 29538-X0030, COMH_EREP_30Land40L_AttachmentD_SitingTechnicalReport, PDF page 39; Transcript, Volume 2, page 108, lines 10 to 22.

¹⁵ Exhibit 29538-X0075, 29538_Information request - round 1 responses, COMH-AUC-2024NOV21-006(a), PDF page 12.

distribution line underbuild would be replaced with new structures in the existing alignment (Configuration C).

12. An existing right-of-way (ROW) on adjacent private property is in place in certain areas along the existing transmission line alignment; however, the City intends to acquire new or additional permanent ROW, approximately 15 metres wide where portions of the transmission line will have a distribution line underbuild, and approximately 20 metres wide where there is no distribution line underbuild. The City proposed a wider ROW to accommodate an increased span length between structures where there is no distribution line underbuild.

13. The total cost estimate for the Preferred Route is \$18.85 million. The City proposed that the project would be constructed during its transmission system-usage shoulder seasons in April-May and September-October to reduce the chance of an outage scenario occurring. It advised that its distribution system has capacity during its shoulder seasons that will allow for system reconfigurations so that no customer would experience long duration outages (greater than eight hours). In the event an outage is longer than eight hours, the City would use a generator or build a new distribution line to serve a customer.¹⁶ The City estimated that the project would be operating by December 31, 2029.

3.1 Interveners

14. The Commission issued a notice of application¹⁷ in accordance with Rule 001: *Rules of Practice*. In response, the Commission received statements of intent to participate (SIPs) from members of the Parkview Drive Homeowners Group, Pacific Street Group and individual persons (Patrick Ries c/o Holy Family Parish, Charlie Liebrecht, and Randy and Catherine Schnell).

15. The Commission granted standing to members of the Parkview Drive Homeowners Group, Pacific Street Group and the individual persons. The Parkview Drive Homeowners Group submitted evidence and argument on topics including impacts on viewscape, property values and recreational pathways. The Pacific Street Group submitted evidence and argument on topics including route selection, project need, health and safety, and impacts on property values. The individual persons submitted concerns in their individual SIPs on topics including future development of land, health and safety, impacts on viewscape and property values, noise impacts, and environmental impacts; however, the individual persons did not submit evidence or argument beyond the concerns noted in their SIPs, and did not participate in the remainder of the proceeding.

16. The Commission held an oral hearing from June 2 to 3, 2025, to consider the application.

4 The approval process for the project

17. In this section of the decision, the Commission describes the legal framework in which its decisions are made. First, the Commission explains its mandate and powers when considering

¹⁶ Transcript, Volume 1, page 37, lines 18 to 25.

¹⁷ Exhibit 29538-X0049, Notice of application - East Ring Enhancement Project - Transmission Line 30L and 40L Rebuild.

facility applications. Second, the Commission describes how it assesses the public interest. Finally, the Commission addresses how it assesses the project application.

4.1 What is the role of the Commission?

18. The Commission is an independent regulator responsible for considering applications for transmission lines in accordance with the legislative framework.¹⁸ The Commission must consider whether the proposed project is in the public interest, having regard to its social, economic, environmental and other effects.¹⁹

19. The applicant bears the onus of demonstrating that approval of its project is in the public interest. Interveners may attempt to show that the applicant has not met its onus by demonstrating the effects of the project on their interests, and explaining what a better balancing of the public interest might be. The Commission's role is to test and assess the evidence before it and engage in a multifaceted analysis established by the regulatory regime, to determine if the project should be approved, and if so, whether any conditions should apply.

4.2 How does the Commission assess the public interest?

20. When the Commission receives an application to construct and operate a transmission line, Section 17(1) of the *Alberta Utilities Commission Act* is engaged. This provision states that, in addition to any other matters it may or must consider, the Commission must give consideration to whether the proposed project is in the public interest, having regard to its social, economic, environmental and other effects.

21. As a starting point, a transmission line application filed with the Commission must comply with Rule 007: *Applications for Power Plants, Substations, Transmission Lines, Industrial System Designations, Hydro Developments and Gas Utility Pipelines* and Rule 012: *Noise Control*. These rules provide a comprehensive set of requirements that a facility application must contain.

22. The Commission also balances a variety of public interest considerations, taking into account the purposes of the *Hydro and Electric Energy Act* and the *Electric Utilities Act*. These statutes provide for the economic, orderly and efficient development of facilities and infrastructure, including transmission lines, that are in the public interest.

23. Conducting a public interest assessment requires the Commission to assess and balance the competing elements of the public interest in the context of each specific application before it. Part of this exercise is an analysis of the nature of the impacts associated with a particular project, and the degree to which the applicant has addressed these impacts. Balanced against this is an assessment of the project's potential public benefits. The assessment includes the positive and adverse impacts of the project on those nearby, such as landowners.

24. 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.

¹⁸ *Hydro and Electric Energy Act*, sections 11, 13.01, 14, 15 and 19.

¹⁹ *Alberta Utilities Commission Act*, Section 17.

4.2.1 How does the Commission assess the project application?

25. 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 Alberta Interconnected Electric System (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*.

26. However, in this application, an approval under Section 34 of the *Electric Utilities Act* is not required because a transmission facility within the service area of the city of Medicine Hat is not part of the AIES nor is it a transmission system, as defined in the *Electric Utilities Act*.²⁰ Accordingly, the Commission's decision is limited to considering the transmission line rebuild facility application.

27. In adjudicating the City's transmission lines MH-30L and MH-40L rebuild facility application, the Commission must decide whether the rebuild of the transmission lines should follow the existing alignment.

28. Consistent with Decision 27523-D01-2023²¹ and Decision 28957-D01-2025,²² which considered applications to rebuild existing transmission lines in their existing alignment, the Commission generally has regard for the location of existing infrastructure when considering transmission line rebuild facility applications. The Commission also takes further guidance from Decision 2009-028,²³ which set out that route decisions cannot be reduced to a mathematical formula applied to charts that rank various criteria.²⁴ The Commission must assess various factors to consider the overall potential impact of a route. With consideration of mitigations for potential impacts, it could be that only certain factors become significant in determining the least impactful route.

5 Discussion and findings

29. The Commission has reviewed the application and has determined that the information requirements specified in Rule 007 have been met. In the following subsections, the Commission first discusses its broader findings on the proposed project and routing, followed by a discussion of each proposed route and the corresponding concerns raised by interveners.

5.1 Is there a need for the project?

30. Although Section 34 of the *Electric Utilities Act* does not apply to this application, the Commission considers that it is necessary for the City to show that the project is needed.

31. The City explained in its application that transmission lines MH-30L and MH-40L were constructed in 1981 and 1982, respectively, that they have reached the end of their useful life,

²⁰ *Electric Utilities Act*, sections 1(1)(z) and 1(1)(ccc).

²¹ Decision 27523-D01-2023: AltaLink Management Ltd. – Transmission Line 150L Rebuild, Proceeding 27523, Application 27523-A001, April 28, 2023.

²² Decision 28957-D01-2025: AltaLink Management Ltd. – Transmission Line 799L Rebuild, Proceeding 28957, Application 28957-A001, March 4, 2025.

²³ Decision 2009-028: AltaLink Management Ltd. – Transmission Line from Pincher Creek to Lethbridge, Proceeding 19, March 10, 2009.

²⁴ Decision 2009-028, paragraph 193.

and that 45 of their 342 structures have already failed inspections and have been replaced.²⁵ In addition, the City forecasted that the transmission lines are at risk of becoming overloaded in the next 10 years during N-1²⁶ import and load scenarios. The City has received commercial and industrial load inquiries, and according to the City's assessment, these inquiries cannot be fully accommodated without exceeding the capacity of the existing transmission lines. The City stated that by installing forecasted capacity now, it seeks to proactively manage needed upgrades to enable greater capital control and gradual capitalization of the project, and therefore, manage its rate impact on the relatively small pool of Medicine Hat service area ratepayers. The proposed rebuild is intended to mitigate current and anticipated overload issues and facilitate the longer-term transition of the City's transmission system to a 138-kV standard.

32. Based on the foregoing, the Commission considers that the City has provided adequate information to show there is a need for the project.

5.2 Did the City's consultation meet the requirements of Rule 007?

33. The City conducted a participant involvement program and notified stakeholders directly affected and directly adjacent to the existing transmission line, including stakeholders within 800 metres of the proposed transmission line route right-of-way boundaries. The City also confirmed that it engaged with Indigenous groups, including the Blood Tribe, Piikani Nation and Siksika Nation.

34. The Commission finds that the participant involvement program undertaken by the City meets the requirements of Rule 007. The program was sufficient to communicate to potentially affected parties the nature, details and potential impacts of the project. It also gave potentially affected parties an opportunity to ask questions, express their concerns and provide input into the project.

5.3 What are the environmental effects of the project?

35. The City retained Maskwa Environmental Consulting Ltd. to prepare an environmental evaluation,²⁷ a vegetation technical memorandum²⁸ and an environmental protection plan²⁹ for the project. Maskwa concluded that with adherence to project-specific mitigation measures, applicable standards and procedures, and compliance with applicable regulatory approvals and conditions, the project was not expected to cause any significant environmental effects.

36. The Commission finds that environmental effects of the proposed project are expected to be minimal considering the City's commitment to the proposed mitigation measures. The location of the project primarily in an urban area and with much of the routing proposed along the existing alignment will further mitigate impacts. The Commission compares the impacts of the preferred and alternate routes in Section 5.5 below, but generally, environmental effects were not a significant factor in its determination of which routing is in the public interest.

²⁵ Transcript, Volume 1, page 13, lines 13 to 16.

²⁶ A transmission system's reliability is assessed against what is referred to as an N minus 1 event (N-1) where "N" refers to the normal operation of the transmission system and the event refers to the loss of an essential element in the delivery of electricity.

²⁷ Exhibit 29538-X0028, COMH_EREP_30Land40L_AttachmentL_EnvironmentalEvaluation.

²⁸ Exhibit 29538-X0072, Attachment 9_COMH-AUC-2024Nov20.

²⁹ Exhibit 29538-X0035, COMH_EREP_30Land40L_AttachmentM_EnvironmentalProtectionPlan.

37. The City identified that sensitive rare plant species were observed in proximity to the project, and specifically the presence of tiny cryptantha (*Cryptantha minima*). The Commission expects the City to adhere to its responsibilities for this endangered species as defined in the *Species at Risk Act*. To facilitate conservation efforts, the Commission expects that all documented locations of tiny cryptantha are provided on an as-needed basis to construction and maintenance workers to ensure avoidance.

5.4 Is the City's route development methodology acceptable?

38. The City also retained Maskwa to identify routes for the proposed transmission lines MH-30L and MH-40L rebuild. This process involved a preliminary stage, a detailed routing stage and a final routing stage. Through its participant involvement program, Maskwa gathered stakeholder feedback and completed various consultations for the route selection process before identifying the Preferred Route, Northeast Alternate Route and Southeast Alternate Route.

39. In the preliminary stage of the route selection process, Maskwa identified a study area corresponding to the transmission lines that were to be rebuilt and developed preliminary routes based on the different design scenarios, which were presented to stakeholders for feedback.

40. During the detailed routing stage, Maskwa obtained stakeholder feedback in addition to field survey and engineering information to refine the routes. This process resulted in Maskwa receiving a number of stakeholder-suggested route options that were further assessed and determined to have a higher impact due to the presence of irrigation pivots, longer crossing spans of the South Saskatchewan River, increased impacts to environmentally sensitive areas and cultivated parcels, or increased number of turn/deflection structures, when compared to the proposed routes. One preliminary route option, known as the Northeast Scenario 3 Route, was removed from further consideration following the route review process and was not included in the City's application to the Commission.

41. In its final routing stage, Maskwa refined potential route relocations arising from stakeholder feedback, and then retained or rejected routes based on additional consultation. Finally, Maskwa completed a comparative analysis of the remaining routes to select the existing alignment as the Preferred Route in addition to two alternate relocation route segments, the Northeast Alternate Route and the Southeast Alternate Route.

42. The Commission finds that Maskwa's siting methodology undertook an iterative process that focused on identifying technically feasible routes with low overall impacts. The siting report is transparent and provides a good summary of the preliminary, detailed and final routing stages including the assessment of stakeholder-suggested route alternatives. Accordingly, the Commission finds the siting and route development methodology to be acceptable.

43. However, the Commission expects that applicants provide accurate information in their comparative siting metrics to help the Commission compare each proposed route. The siting metric table³⁰ initially filed by the City included multiple errors, which had to be corrected by the City through responses to Commission information requests.³¹

³⁰ Exhibit 29538-X0030, COMH_EREP_30Land40L_AttachmentD_SitingTechnicalReport, PDF page 38.

³¹ Exhibit 29538-X0075, 29538_Information request - round 1 responses, COMH-AUC-2024NOV21-007(f), PDF pages 14-15 and COMH-AUC-2024NOV21-008, PDF page 15; Exhibit 29538-X0108, 29538_AUC information requests - round 2 responses, COMH-AUC-2025FEB03-002(a)(i), PDF pages 3-4.

44. In addition, significant process, including hearing questions, an undertaking, further questions to the undertaking, and a revised undertaking were required to obtain a siting metrics table comparing the City's rejected preliminary Northeast Scenario 3 Route with the applied-for Preferred Route and Northeast Alternate Route after the City's initial response was shown to be inaccurate. While the Commission ultimately received the information it needed to make its decision, inefficiencies were introduced to the process because of the initial errors.

5.4.1 Incremental impacts in relation to the existing route and transfer of impacts

45. In this proceeding, the Pacific Street Group submitted that the Commission should consider route development in areas with lower residential density and approach this application as if it were a new build and decide the best route based on modern siting principles.

46. This argument has been considered by the Commission in prior decisions. In Decision 27523-D01-2023,³² the Commission considered an application from AltaLink to rebuild Transmission Line 150L. Its preferred route followed the existing right-of-way, which was opposed by numerous residential groups; however, the Commission approved the preferred route and rejected the alternate route. The Commission noted that:

Regardless of whether the transmission line constitutes a “rebuild” or a “new build” as argued by the parties, the Commission finds that it would be unsound to consider the application without having regard for the location of the existing infrastructure. For 67 years, people have arranged their affairs based on the location of this transmission line. To ignore this, creates an arbitrary fiction.

Accordingly, when weighing the impacts of the Preferred Route, the Commission will consider those incremental impacts associated with the changes to the existing line. This is consistent with how the Commission has decided similar applications in the past.³³

47. Further, in Decision 2014-219,³⁴ the Commission approved the preferred route of Transmission Line 80L, which followed the existing right-of-way but was opposed by a residential group. The Commission found that since the neighbourhood was built alongside the existing transmission line, rebuilding the line along an existing right-of-way would create little to no new impacts. The Commission found that although property values in the neighbourhood could increase due to the relocation of the line, this factor did not strongly support the alternate route since the neighbourhood was built beside the existing line and the residents were likely aware of the transmission line when their properties were constructed or purchased. However, the Commission did note that the taller structures could have negative visual impacts.³⁵

48. Transmission lines MH-30L and MH-40L have been in their current location for nearly 45 years. The City submitted that most landowners adjacent to the existing route purchased and

³² Decision 27523-D01-2023: AltaLink Management Ltd. – Transmission Line 150L Rebuild, Proceeding 27523, Application 27523-A001, April 28, 2023.

³³ Decision 27523-D01-2023: AltaLink Management Ltd. – Transmission Line 150L Rebuild, Proceeding 27523, Application 27523-A001, April 28, 2023, paragraphs 41 and 42.

³⁴ Decision 2014-219: AltaLink Management Ltd. – Red Deer Area Transmission Development, Proceeding 2669, Application 1609677, July 29, 2014.

³⁵ Decision 2014-219, paragraphs 333-340; the Commission rejected a review and variance application in Decision 2014-361. The review panel found there was no error of law in the original panel, “taking into account the fact that rebuilding on the right-of-way would create little or no new impacts because area residents would not be newly exposed to line 80L.”

developed their lands in the presence of the existing line and that relocating the line into any of the alternate routes would transfer impacts from these landowners to new stakeholders. It added that this would result in additional costs and impacts, which outweigh any incremental impacts to existing adjacent landowners associated with the rebuild.³⁶ The Commission agrees that the presence of the existing transmission line is a significant factor that should be considered in the circumstances.

49. Moving a line away from an existing alignment will in many cases simply result in a transfer of impacts. In Decision 2012-120, when interveners argued that a new transmission line should be moved away from their lands towards the lands of others, the Commission noted that moving the proposed transmission line from one group to another group does not mitigate landowner impacts.³⁷

50. The Commission endorses this principle in the context of this proceeding, and notes impacts should only be transferred from one group of landowners to another when it is in the public interest to do so. Ultimately, the Commission must balance the incremental impacts of the Preferred Route against the impacts of the alternate routes based on the evidence before it.

5.5 Which proposed route is in the public interest?

51. For the reasons explained in this section, the Commission approves the City's Preferred Route. This section of the decision analyzes the Preferred Route, and the alternate routes from north to south:

- a. Preferred Route
- b. Northeast Alternate Route
- c. Southeast Alternate Route

5.5.1 Preferred Route

52. Over half of the length of the proposed rebuild has no alternate route, with only a Preferred Route proposed from the east side of Parkview Drive N.E. in the north to the Highway 1 crossing in the south.

53. A segment of the Preferred Route between the east side of Parkview Drive N.E. and the South Saskatchewan River, referred to as the Pacific Street segment, occupies a distance of approximately 0.45 kilometres, and was opposed by the Pacific Street Group.

5.5.1.1 Preferred Route segment with opposition

54. The Commission finds that the Preferred Route is in the public interest along the Pacific Street segment.

55. The Preferred Route in this area continues east from Parkview Drive N.E. along an existing public utility corridor, across Perry Crescent N.E. onto a narrow concrete median along

³⁶ Transcript, Volume 2, page 110, lines 5 to 25, page 111, lines 1 to 25, and page 112, line 1.

³⁷ Decision 2012-120: AltaLink Management Ltd. and ATCO Electric Ltd. – Hanna Region Transmission Development, Proceeding 979, Applications 1606831, 1606787, 1606888, 1606951, 1607005, 1607074, 1607093, 1607128, 1607150 and 1607188, May 8, 2012, paragraph 145.

the middle of Pacific Street N.E., and across Preston Avenue N.E. toward the South Saskatchewan River (as shown in green in Figure 4).

Figure 4. Preferred Route Pacific Street segment³⁸



56. Members of the Pacific Street Group opposed the Preferred Route and raised concerns with route selection, visual and property value impacts, health and safety, and traffic impacts.

57. The Pacific Street Group requested that the Commission deny both the Preferred Route and Northeast Alternate Route, stating that the City's route development process was flawed. Pacific Street Group further requested that the City should reassess its Northeast Scenario 3 Route, shown in dashed purple/grey in Figure 5, which the City removed from consideration before it filed its application with the Commission. The Pacific Street Group stated that locating the transmission line in its current alignment would have significant and long-lasting new impacts on the residences of the Parkview neighbourhood, and that conversely, locating the transmission line outside of the residential area would minimize impacts on nearby residents and property owners, including Pacific Street Group members.

58. The rejected Northeast Scenario 3 Route turns north from the Southridge MHS-3 Substation along 11 Avenue N.E. across Parkview Drive N.E. and then turns east to follow a narrow tract of land between the south ridge of the South Saskatchewan River and the Ranchlands residential neighbourhood. The route then turns south, bisecting land set aside for the future Ranchlands Phase 2 and 3 residential development and an agricultural irrigation pivot, then crossing over the South Saskatchewan River until it intersects with the existing Transmission Line MH-40L.

³⁸ Exhibit 29538-X0070, Attachment 7_COMH-AUC-2024Nov20, PDF pages 9 and 12.

Figure 5. Northeast Scenario 3 Route³⁹

59. The City considered the Northeast Scenario 3 Route during its preliminary and detailed routing stages; however, the City removed this route segment from consideration as it did not follow existing infrastructure; it had the highest potential for environmental impacts on native grasslands, vegetation and snake hibernacula; it interacted with an interpretive trail; it would create a new right-of-way in an undisturbed area, including a new crossing of the South Saskatchewan River; and it had terrain constraints for construction and operations.⁴⁰ Further, the Northeast Scenario 3 Route had an estimated incremental cost of \$1,400,000 compared to the Preferred Route alignment.⁴¹

60. The City stated that the Preferred Route along the Pacific Street segment would only result in incremental impacts due to the increase in structure heights and the size of the transmission conductor given the existing transmission line's location in the Parkview neighbourhood. However, the Pacific Street Group disagreed with the City's assertion of incremental impacts and submitted that the Northeast Scenario 3 Route should have been reassessed given that the location within the City's future Ranchlands Phase 2 and 3 residential developments would be considered greenfield impacts that could be managed.

61. The City stated that the existing transmission line was built before Pacific Street existed and that the Parkview neighbourhood was developed around the transmission line, including Pacific Street Group members' homes being either constructed or purchased with the existing transmission line present.⁴² Further, the City argued that the Northeast Scenario 3 Route would transfer impacts of the transmission line to newly exposed residences in the Ranchlands neighbourhood.⁴³

³⁹ Exhibit 29538-X0030, COMH_EREP_30Land40L_AttachmentD_SitingTechnicalReport, PDF page 29.

⁴⁰ Exhibit 29538-X0031, COMH_EREP_30Land40L_AttachmentE_RoutRevisionLog, PDF page 14; Transcript, Volume 2, page 111, lines 16 to 25, page 112, lines 1 to 25, and page 113, lines 1 to 10.

⁴¹ Exhibit 29538-X0143, 29538-COMH Response to AUC Information Requests Round 3 - April 25, 2025, COMH-AUC-2025APR11-001(a), PDF page 4.

⁴² Transcript, Volume 2, page 107, lines 14 to 25 and page 108, line 1.

⁴³ Transcript, Volume 2, page 113, line 1 and page 114, lines 1 to 18.

62. The Commission finds that the City's route development process to consider the Northeast Scenario 3 Route was not flawed as described by the Pacific Street Group. The Commission agrees with the City that the Preferred Route will have lower overall impacts. The Commission recognizes that while the Preferred Route would result in incremental impacts with an increased structure height, this must be balanced against the new impacts of the Northeast Scenario 3 Route and its additional costs. The Commission finds that the presence of the existing transmission line is a significant mitigating factor of the Preferred Route. The parties opposed to the preferred alignment all bought their properties well after the existing MH-40L transmission line was built. They were therefore aware of the line's presence and impacts to their lands when they bought the properties.

63. Therefore, the Commission finds that the Northeast Scenario 3 Route would largely result in a transfer of impacts to new stakeholders and not in a reduction of overall impacts. Further, it would come at an increased cost of \$1,400,000 to ratepayers.

64. With respect to the Pacific Street Group's concerns on visual and property value impacts associated with the Preferred Route, the Pacific Street Group stated that replacing the existing transmission line with new, taller structures will have a negative influence on the property values of the Pacific Street Group members' properties and their enjoyment of their properties. The Pacific Street Group did not provide expert evidence pertaining to potential property value impacts.

65. The City retained Serecon Inc. to assess potential property valuation impacts of the project, which concluded that property value impacts from disturbances tend to be reduced when there is an existing disturbance already in place, such as an existing transmission line, roadway, pipeline or utility corridor.⁴⁴ Further, Serecon stated that in a rebuild scenario, adjacent properties have already been exposed to a high voltage transmission line and property value impacts have already been realized in the market, resulting in incremental property value impacts between the existing and rebuilt transmission line.⁴⁵ The City argued that the unchallenged evidence from Serecon is that the incremental addition to structure height is not likely to result in property value impacts.⁴⁶

66. At the hearing, Mina Carlson and Natali Austin advised that their properties have existing vegetation screening that partially obscures the existing transmission line but that it will not block the visual impacts of taller structures,⁴⁷ while Adele Eslinger and Sandra Redden advised that their properties do not have existing vegetation screening.⁴⁸ To mitigate concerns, the City committed to work with Pacific Street Group members on the placement of structures to limit the impact of their visual concerns and to consider potential mitigations such as screening.⁴⁹

67. In the absence of Pacific Street Group expert evidence on property value impacts, the Commission agrees with the City that the incremental addition to structure height is not likely to result in property value impacts for the Pacific Street segment. Further, the Commission accepts

⁴⁴ Exhibit 29538-X0042, COMH_EREP_30Land40L_AttachmentQ_PotentialPropertyValueImpacts, PDF page 2.

⁴⁵ Exhibit 29538-X0042, COMH_EREP_30Land40L_AttachmentQ_PotentialPropertyValueImpacts, PDF page 2.

⁴⁶ Transcript, Volume 2, page 106, lines 15 to 18.

⁴⁷ Transcript, Volume 2, page 78, lines 1 to 14, page 79, lines 1 to 25, and page 80, lines 1 to 25.

⁴⁸ Transcript, Volume 2, page 75, lines 4 to 17.

⁴⁹ Exhibit 29538-X0165, Letter to AUC with list of commitments, PDF pages 2 and 5; Transcript, Volume 1, page 27, lines 1 to 14; Transcript, Volume 2, page 119, lines 23 to 25, page 120, lines 1 to 25, and page 121, lines 1 to 14.

the City's commitments to working with the Pacific Street Group members to mitigate their visual impact concerns with visual screening and structure placement, where feasible.

68. With respect to Pacific Street Group member concerns for health and safety, M. Carlson stated that the City should have minimized the exposure of the transmission line's effects of electromagnetic fields (EMF) on residential properties⁵⁰ and N. Austin advised her concerns of the potential health risks from exposure to a stronger electrical field.⁵¹ Through questioning at the hearing, M. Carlson advised that she had not discussed her health and safety concerns with the City but that her concerns were identified through her own research on EMF.⁵²

69. The Commission has previously held that it cannot give weight to opinion evidence about the health effects of EMF from lay witnesses given the complexity of the topic. The Commission continues to place significant weight on the World Health Organization's conclusion that, based on available research data, exposure to EMF is unlikely to constitute a serious health hazard, and also on Health Canada's conclusion that exposure to EMF from transmission lines is not a demonstrated cause of any long-term adverse effect to human or animal health.

70. In the absence of Pacific Street Group expert evidence on health and safety impacts, the Commission relies on the submissions from the City. The City stated that it follows guidance from Health Canada and guidelines issued by the International Commission on Non-Ionizing Radiation Protection.⁵³ The City also prepared worst-case EMF profiles,⁵⁴ which predicted results far below internationally accepted thresholds and shared these EMF profiles with residents that had raised EMF as a concern during the consultation process. The City's EMF profiles indicate that EMF measurements substantially decrease toward the edge of the transmission line ROW and continue to decrease with increased distance outwards. Therefore, the Commission finds that there is no evidence to suggest that EMF from the transmission line will result in any adverse health effects.

71. In terms of Pacific Street Group member concerns for traffic impacts, A. Eslinger and S. Redden stated that the narrow concrete median in the middle of the Pacific Street N.E. roadway created an obstruction for traffic. A. Eslinger further inquired why the City did not consider an underground alignment for this specific section of the Pacific Street segment in the concrete median. In argument, the City stated that the impacts to traffic were not raised during consultation and that an underground alignment was not considered as it is not a cost-effective option.⁵⁵

72. The Commission understands that the concrete median in the middle of the Pacific Street roadway has been present for a long period of time and that residents have accommodated the median in their daily traffic activities. Given the City, as the transmission facility owner, is best suited to determine if an underground route alignment is warranted in this location, and that the City did not consider an underground route option to be a cost-effective option to construct and

⁵⁰ Exhibit 29538-X0135, PACIFIC STREET GROUP Written Submissions of Pacific Street Group (PSG), PDF page 21; Transcript, Volume 2, page 69, lines 4 to 25 and page 70, lines 1 to 9.

⁵¹ Transcript, Volume 2, page 66, lines 3 to 18.

⁵² Transcript, Volume 2, page 78, lines 15 to 25, page 83, lines 17 to 25, and page 84, lines 1 to 3.

⁵³ Exhibit 29538, X0029, COMH_EREP_30Land40L_AttachmentO_ParticipantInvolvementProgram, PDF pages 22-23.

⁵⁴ Exhibit 29538-X0112, EastRingEnhancementProject_CityOfMedicineHat_29538_EMF_Profiles.

⁵⁵ Transcript, Volume 2, page 117, lines 20 to 25, page 118, lines 1 to 13, and page 119, lines 3 to 17.

maintain, the Commission accepts that it was reasonable for the City not to include an underground route option for consideration in the circumstances.

73. The Commission finds that along the Pacific Street segment, the Preferred Route is in the public interest, with cost and presence of the existing transmission line being important factors.

5.5.1.2 Preferred Route segment with no opposition

74. The Commission finds that the remaining portion of the Preferred Route with no alternate segments is in the public interest. Notably, no parties intervened to oppose this segment and it follows the alignment of the existing transmission line.

5.5.2 Northeast Alternate Route

75. The Commission finds that the Preferred Route is a lower impact route than the Northeast Alternate Route.

76. The Preferred Route in this area turns south from the NE Crescent Heights MHS-5 Substation along 11 Avenue N.E. and then turns southeast along 20 Street N.E. across to the east side of Parkview Drive N.E. (as shown in green in Figure 6). The Northeast Alternate Route (shown in yellow in Figure 6) relocates the transmission line away from residential developments toward an environmental reserve greenspace by turning north from the Southridge MHS-3 Substation along 11 Avenue N.E. across Parkview Drive N.E. and then turns east to follow the north and east boundaries of Parkview Drive N.E. until it intersects with the existing Transmission Line MH-40L.

Figure 6. Preferred Route and Northeast Alternate Route⁵⁶



77. Members of the Parkview Drive Homeowners Group were opposed to the Northeast Alternate Route but were in favour of the Preferred Route. Members were located in the Terrace View, Ranchlands and Parkview neighbourhoods and raised concerns with viewscape and property value impacts and recreational pathway impacts.

⁵⁶ Exhibit 29538-X0030, COMH_EREP_30Land40L_AttachmentD_SitingTechnicalReport, PDF page 34.

78. The Parkview Drive Homeowners Group's concerns on viewscales and property value impacts primarily revolved around the relocation of the transmission line to the Parkview Drive N.E. roadway corridor. For Parkview Drive Homeowners Group members residing in the Terrace View neighbourhood, concerns regarding their viewscales of the South Saskatchewan River Valley were prominent and for Parkview Drive Homeowners Group members residing in the Ranchlands and Parkview neighbourhoods, the impact of shadowing from the transmission line structures was of concern, all of which the Parkview Drive Homeowners Group submitted would lead to a decrease in property valuation. At the hearing, Parkview Drive Homeowners Group members residing in the Terrace View neighbourhood advised that they purposely have no existing vegetation screening to maximize their viewscales of the South Saskatchewan River valley. The Parkview Drive Homeowners Group did not provide expert evidence on potential property value impacts.

79. The City retained Serecon Inc. to assess potential property valuation impacts of the project, which concluded that the primary characteristic influencing potential property value impacts from transmission lines is visibility, such that the more visible a transmission line is from a residential property, the more potential there is for property value impacts.⁵⁷ Further, Serecon stated that potential impacts from transmission lines tend to be greater in a greenfield situation as opposed to a rebuild and estimated a property valuation decrease in the zero per cent to 10 per cent range for the Northeast Alternate Route.⁵⁸ The City accepted that relocating the transmission line to the Northeast Alternate Route would likely result in impacts to viewscales and property values.⁵⁹ As previously discussed, the City submitted that Serecon's evidence is that there are not likely to be property value impacts associated with the Preferred Route.

80. The Commission accepts the evidence of the City and Serecon that the incremental addition to structure height is not likely to result in greater property value impacts for the Preferred Route as compared to the expected impacts of relocating the transmission line to the Northeast Alternate Route, which would likely result in increased viewscape and property value impacts.

81. With respect to the Parkview Drive Homeowners Group's concerns on recreational pathway impacts, the Parkview Drive Homeowners Group stated that the Northeast Alternate Route transmission structures would be built adjacent to a recreational pathway along Parkview Drive N.E. and that the Parkview Drive Homeowners Group residents' use and enjoyment of this pathway and the surrounding natural areas would be negatively affected. The City stated that it did not anticipate any impact to the recreational pathway as the transmission structures would be located adjacent to the pathway and that no structure guywires would intersect the pathway surface.⁶⁰ The City advised that temporary access restrictions during construction would be expected but that it did not anticipate any pathway access constraints once construction was complete.

82. The Commission finds that the impacts to the recreational pathway caused by the Northeast Alternate Route would be minimal due to the temporary nature of the construction and

⁵⁷ Exhibit 29538-X0042, COMH_EREP_30Land40L_AttachmentQ_PotentialPropertyValueImpacts, PDF page 2.

⁵⁸ Exhibit 29538-X0042, COMH_EREP_30Land40L_AttachmentQ_PotentialPropertyValueImpacts, PDF pages 2-3.

⁵⁹ Transcript, Volume 2, page 110, lines 5 to 7.

⁶⁰ Exhibit 29538-X0143, 29538-COMH Response to AUC Information Requests Round 3 - April 25, 2025, COMH-AUC-2025APR11-002(a), PDF page 6.

the adjacent location of the structures to the pathway. During the hearing, the City confirmed that similar construction impacts are expected to the pedestrian sidewalk in the Preferred Route, including temporary access restrictions resulting from staged or sequenced closures to complete the project.⁶¹ As previously noted, the City advised that system reconfigurations may be completed so that no customer would experience outages greater than eight hours during construction. In the event an outage is longer than eight hours, the City would use a generator or build a new distribution line to serve a customer.⁶²

83. The Commission finds that along this segment, the Preferred Route has the lowest overall impacts. The Northeast Alternate Route is expected to cost an additional \$1,400,000. Further, while the impacts of construction are similar in both scenarios, the Northeast Alternate Route would likely cause additional impacts to certain viewsapes and property values as compared to the Preferred Route. The Commission is satisfied with the proposed mitigation measures for the Preferred Route, including measures for potential outages.

84. Based on the foregoing, the Commission finds the Preferred Route between the NE Crescent Heights MHS-5 Substation and Parkview Drive N.E. to be in the public interest.

5.5.3 Southeast Alternate Route

85. The Commission finds that the Preferred Route is a lower impact route than the Southeast Alternate Route.

86. The Preferred Route in this area turns south from the Southridge MHS-3 Substation along 13 Avenue S.E. and then along South Boundary Road S.E., continuing east along an undeveloped road allowance and across Highway 1 (as shown in green in Figure 7). The Southeast Alternate Route (shown in blue in Figure 7) relocates the transmission line away from residential developments toward commercial developments by turning north from the Southridge MHS-3 Substation along 13 Avenue S.E. At the Holy Family Parish, the route parallels property boundaries to the Highway 1 road allowance and turns southeast to follow the south boundary of Highway 1 until it intersects with the existing Transmission Line MH-30L.

⁶¹ Transcript, Volume 1, page 36, lines 17 to 25, and page 37 lines 1 to 7.

⁶² Transcript, Volume 1, page 37, lines 18 to 25.

Figure 7. Preferred Route and Southeast Alternate Route⁶³

87. Patrick Reis c/o Holy Family Parish opposed the South Alternate Route as the route paralleled their property boundaries and they had concerns with proximity of the project to their parish, impacts on future development of their land, property liability and safety, and impacts to snow removal. Charlie Liebrecht opposed the Preferred Route and had concerns with proximity of the project and visual and property value impacts as the route was located adjacent to his property across from South Boundary Road S.E. Randy and Catherine Schnell also opposed the Preferred Route and had concerns with proximity of the project, property value impacts, health, noise impacts, adverse effects on the environment, and induced current and shocks as the route was located within approximately 0.45 kilometres of their property. However, none of the above parties participated in the hearing process beyond filing their SIPs.

88. The comparison between the alternate and preferred routes in this segment largely comes down to the alternate route having fewer residences in close proximity while the preferred route is an existing route with a shorter length and lower cost. However, while the Southeast Alternate Route would have fewer residences within 50 metres overall, it has 28 more newly exposed first-row residences within 25 metres of the transmission line relative to the Preferred Route. While the Commission acknowledges the concerns raised by parties that oppose the Preferred Route, it must consider the existing nature of the transmission line and that rebuilding it along the existing alignment would only result in incremental impacts for the Preferred Route whereas the Southeast Alternate Route would result in new impacts. In addition, the Southeast Alternate Route would be 0.6 kilometres longer and approximately \$1,254,615 more expensive.

89. The Commission considers that the presence of the existing transmission line, which results in a lower number of newly exposed first-row residences, and the lower cost weigh in favour of the Preferred Route.

90. Based on the foregoing, the Commission finds the Preferred Route between the Southridge MHS-3 Substation and Highway 1 to be in the public interest.

⁶³ Exhibit 29538-X0030, COMH_EREP_30Land40L_AttachmentD_SitingTechnicalReport, PDF page 34.

5.6 Conclusion

91. The Commission finds the decommissioning, salvage and rebuild of the existing Transmission Line MH-30L and Transmission Line MH-40L along the Preferred Route to be in the public interest in accordance with Section 17 of the *Alberta Utilities Commission Act*.

6 Decision

92. Under sections 14, 15, 19 and 21 of the *Hydro and Electric Energy Act*, the Commission approves the application and grants the City of Medicine Hat the approval set out in Appendix 1 – Transmission Line Permit and Licence 29538-D02-2025 to alter and operate Transmission Line MH-30L (Appendix 1 will be distributed separately).

Dated on August 28, 2025.

Alberta Utilities Commission

(original signed by)

Vera Slawinski
Panel Chair

(original signed by)

Cairns Price
Commission Member

Appendix A – Proceeding participants

Name of organization (abbreviation) Company name of counsel or representative
Borden Ladner Gervais LLP Matthew Schneider Karen Salmon City of Medicine Hat Devon Hanson Rochelle Pancoast
Carscallen LLP Michael Niven Sarah Howard Parkview Drive Homeowners Group Ralph and Amanda Van Dam Albert Stark Bob Kalista Curtis Biederman Daniel Maier Garry Karst Gord and Deb Baron Robert and Nancy Steinkey Jay Galarneau Lorrie Stadnicki and Tyson Stelter Stuart and Norma McLennan Michael and Sabrina Baker Noel Darr Patrick and Renae Quinlan Sandi and Michael Lee Shaun Andrade Terry and Linda Flaig Wayne Hall Tom Funk Aaron Weimer
McLennan Ross LLP Marika Cherkawsky Pacific Street Group Adele and Dale Eslinger Sandra Redden Mina Carlson Rory Sehn Natali and Darrell Austin Leah and Tony Schmidt Tania Haynes
Alberta Utilities Commission Commission panel Vera Slawinski, Panel Chair Cairns Price, Commission Member Commission staff Matthew Parent (Commission counsel) Peju Anozie (Commission counsel) Dan Burton Glenn Harasym Matthew Ocando

Appendix B – Oral hearing – registered appearances

Name of organization (abbreviation) Name of counsel or representative	Witnesses
City of Medicine Hat Matthew Schneider, Borden Ladner Gervais LLP, counsel Karen Salmon, Borden Ladner Gervais LLP, counsel	Devon Hanson Rochelle Pancoast Ryan Desrosiers Trevor Joyal Glen Doll
Parkview Drive Homeowners Group Michael Niven, Carscallen LLP, counsel Sarah Howard, Carscallen LLP, counsel	Ralph Van Dam Robert Steinkey Michael and Sabrina Baker Patrick Quinlan Wayne Hall
Pacific Street Group Marika Cherkawsky, McLennan Ross LLP, counsel	Adele Eslinger Sandra Redden Mina Carlson Natali Austin Tania Haynes