

## Renewable approval pause period – stakeholder comments and responses

### Stakeholder responses

Hi,

We believe a hold on approvals only would be the best method of recourse for the pause. This allows continued investment via development and some continuity for developers that have works ongoing. Furthermore, the AUC should value those ratepayers that see significant benefit to the projects and relationships they have established to provide some certainty on progress.

Thanks,

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Attn: Alberta Utilities Commission, [inquiries@auc.ab.ca](mailto:inquiries@auc.ab.ca)

Thank you for seeking stakeholder feedback on implementing the approval pause for the moratorium on renewables development. I recommend **approval hold only**. The following is the rationale for my recommendation:

- the right of Albertans and the global community to a healthy and sustainable environment, a right now recognized by the United Nations;
- the urgent need to limit future global warming to avert the worst of the consequences of the climate crisis on human life and dignity;
- the critical role of renewables in achieving a carbon neutral economy;
- the role of Alberta as a leader in solar and wind power;
- my hope to minimize the impact of this moratorium on renewables development in Alberta;
- acknowledgment that while a stakeholder and policy review is clearly needed, the need for a moratorium has not been established and appears to be politically motivated; and
- an approval hold only response may minimize the potential for investors to withdraw from Alberta, and could expedite project initiation after the end of moratorium.

Thank you for considering my feedback.

Best Regards,

August 7, 2023

Dear Carolyn Dahl Rees, Chair of the Alberta Utilities Commission,

In response to your August 3 announcement of an inquiry and pause on approvals for new renewable electricity generation, I would like to take this opportunity to submit comments. Thank you for seeking stakeholder feedback.

I support the option of **approval hold only**. My rationale is based on my understanding that, of the options being offered, **approval hold only** will minimize the impact on renewable energy applications. I view this as important for reasons including the following:

- Renewable energy plays an essential role in limiting global warming and avoiding the worst consequences of the climate crisis on human life and dignity.
- Delays in approving renewable energy projects will result in more greenhouse gas emissions, which will infringe on people's [internationally recognized right to a healthy environment](#).
- More drastic measures (complete or partial abeyance) would increase the likelihood that investors would withdraw from Alberta, slowing development after the end of moratorium.
- Alberta is currently a leader in solar and wind power, which provides [significant economic benefits](#).
- The importance of a stakeholder and policy review is very real, but this does not need to result in a moratorium.

Thank you for your time and for considering this feedback.

Kind regards,

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AUC office:

Stakeholder comments in regards to 'R.E. Generations Approval Pause Regulation' announced August 3, 2023.

Peace Energy Cooperative is a renewable energy investment Co-op developing small utility scale projects for community investment and ownership. We are days away from submitting our AUC application for a 4.99MW solar project near the town of Peace River, AB, under the Checklist Process.

We are very disappointed to see this order-in-council restricting renewable energy development in Alberta on such short notice with no consultation.



With solar, there are no toxic waste issues for end-of-project land restoration. In fact, our project is going to use the principle of Agrivoltaics to improve the fertility of the land upon which it is situated. Since the solar resource does not run out, the project restoration at end-of-life is simply to re-power with new more efficient equipment so that the facility will continue to produce clean power for many generations. If needed the equipment can be completely removed and fully recycled if the location were to cease operations. This plan is already accounted for in our project application.

As a stakeholder, if this pause must take place, we recommend that the AUC use an 'Approval Hold Only' process. If applications must wait until February 29, 2024, there will be a large backlog which will greatly slow down the entire approval process. Projects which are essentially ready to go now, may end up out of place in a lengthy queue.

Further, we also suggest that the AUC set the limit for this pause, from over 1MW, to over 5 MW. The Small Scale Generator Checklist Process is already simplified and streamlined for minimal impact projects such as ours under 5MW, and this pause will unduly burden this type of community level project.

Thank you for this opportunity to provide stakeholder feedback.

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I am writing as a concerned Albertan in the Smoky River area. I would like to support the complete abeyance option because I am concerned about the birds in our area being affected by the windmills as our area has migrating birds ...protected species like whooping cranes that I see fly over my house about only 100 feet up in the air. The proposed 688 feet windmill would for sure be a problem. I am also concerned that our property value would decrease. I also have concerns regarding the noise pollution.

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To whom it may concern,

I would like to express my uttermost gratitude for the recent pause on renewable energy generation approvals in Alberta and the necessary inquiries on such developments on Albertans farmland.

Our community has many concerns about the enormous proposed windmills to be erected in our area of MD Smoky River 130, such as:

- the cost to our province and community
- benefits vs. Risk analysis
- effects to our bird population (we live in a bird sanctuary and the proposed location of these turbines are in the direct pathway of the bird flight)
- the destruction of good farmland
- the eyesore it will cause to our natural environment
- the actual, factual percentage of energy savings from these expensive, temporary, and non-recyclable parts.
- the carbon footprint of fabricating and manufacturing these turbine engines, shipping them to northern Alberta, and then assembling them.
- the cost of the above plus the maintenance to keep them going safely.



- the number of abandoned turbine engines/ renewable energy projects Which have been abandoned, rendering unusable farmland and insurmountable debt to the province and communities (unwanted by taxpayers)
- The known and unknown health risks to the residents who live in close proximity to these turbines (do we have any legitimate long term studies without conflicts of interest?)
- the devaluation of property in the areas close to the turbines
- the consent of residents in the area have not been requested and should be required since they are this ones who will be most effected by the project! The private landowners who offered their farmland do not reside there nor farm there so they only profit without the risk, but not so for all the families surrounded by and surrounding the proposed project. I'm talking multi-generational family farms here. It's inconceivable to me that they are not considered in such a massive project with major consequences to them. Air rights/env effects are just as important as land rights.

There are so many things to consider, and it is my belief that the irreversible harms far out way the benefits to our community.

My vote is for complete abeyance.

Thank you for your consideration on this topic.

Sincerely,

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Good afternoon,

I am weighing in as a very concerned rural landowner in Alberta.

I am not in favour of expanding our current electricity grid to include any further renewable energy projects.

I think we need to learn lessons from what has happened globally over the past 10, 20, 30 years and beyond.

Over the past 10 years, 3.8 trillion has been spent globally on wind and solar and yet fossil fuel use has decreased by only one percent. It has gone from 82 to 81%.

According to Johan Sollid, with Karnfull Energy DK, Denmark has invested over 50 billion euros (73 trillion CDN) in wind and solar - mainly wind - since the 1970s and yet still obtain only 10% of their total energy usage from these unreliable energy sources.

Because of the very poor energy density of wind and solar, and the intermittent, unreliable nature of these renewable sources I would like to see a complete abeyance of all renewable energy projects in Alberta going forward.

Please do not send us down the path of unreliable, expensive electricity in Alberta. Let's work toward continuing to make Alberta's oil and gas the cleanest, most efficient in the world.

Kind regards,

Dear Alberta Utilities Commission,

I am writing to provide my input and perspective on the recent announcement by the Alberta Utilities Commission regarding the temporary pause on approvals for new renewable electricity generation projects. As a concerned stakeholder, I believe it is crucial to share my thoughts on this matter.

Firstly, I appreciate the AUC's initiative in seeking feedback from stakeholders regarding the implementation of the approval pause. It is evident that decisions of this nature have significant implications for our province's energy landscape and future sustainability.

In response to the options presented, I am in favor of **Option 1**, which involves a comprehensive review of the entire process. My rationale for supporting this option is rooted in the belief that the current approach necessitates a thorough re-evaluation. Several factors contribute to this viewpoint.

The concerns I have pertain to the entire renewable energy approval process, ranging from the signing of lease options prior to public consultation, to the limited input provided by communities on AEPA environmental referral reports, and the rigid legal expert requirements stipulated by the AUC. This combination of factors makes it challenging for the public to meaningfully participate in a cost-effective manner. Consequently, I believe that a comprehensive review, conducted through a public inquiry, is necessary to address these issues comprehensively.

Given the complexities and intricacies involved, I am apprehensive about the efficacy of continuing with the approval review process as outlined in Options 2 and 3. If the AUC proceeds with accepting applications and executes partial processes under the existing guidelines, it could imply that substantive changes are unlikely. However, if substantial modifications are eventually introduced, re-evaluating all submitted applications would be an inefficient utilization of time and resources for both applicants and the AUC.



In light of the aforementioned challenges and potential setbacks, I believe that the decision to pause the approval process is prudent. This temporary pause not only acknowledges the need for reform but also allows for a comprehensive review that ensures all aspects of the process are thoroughly examined and improved upon.

In conclusion, I support **Option 1** due to the necessity of a comprehensive review that addresses the current shortcomings in the renewable energy approval process. The ultimate goal should be to establish a more transparent, participatory, and efficient process that encourages meaningful stakeholder input and promotes responsible renewable energy development in our province.

Thank you for considering my feedback on this critical matter. I appreciate the AUC's dedication to fostering a more sustainable energy future for Alberta, and I look forward to witnessing the positive changes that will arise from this review.

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In conclusion, I support **Option 1** due to the necessity of a comprehensive review that addresses the current shortcomings in the renewable energy approval process. The ultimate goal should be to establish a more transparent, participatory, and efficient process that encourages meaningful stakeholder input and promotes responsible renewable energy development in our province.

Thank you for considering my feedback on this critical matter. I appreciate the AUC's dedication to fostering a more sustainable energy future for Alberta,



and I look forward to witnessing the positive changes that will arise from this review.

Sincerely,

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Dear Alberta Utilities Commission,

I am writing to provide my input and perspective on the recent announcement by the Alberta Utilities Commission regarding the temporary pause on approvals for new renewable electricity generation projects. As a concerned stakeholder, I believe it is crucial to share my thoughts on this matter.

Firstly, I appreciate the AUC's initiative in seeking feedback from stakeholders regarding the implementation of the approval pause. It is evident that decisions of this nature have significant implications for our province's energy landscape and future sustainability.

In response to the options presented, I am in favor of **Option 1**, which involves a comprehensive review of the entire process. My rationale for supporting this option is rooted in the belief that the current approach necessitates a thorough re-evaluation. Several factors contribute to this viewpoint.

The concerns I have pertain to the entire renewable energy approval process, ranging from the signing of lease options prior to public consultation, to the limited input provided by communities on AEPA environmental referral reports, and the rigid legal expert requirements stipulated by the AUC. This combination of factors makes it challenging for the public to meaningfully participate in a cost-effective manner. Consequently, I believe that a comprehensive review, conducted through a public inquiry, is necessary to address these issues comprehensively.

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Firstly, I appreciate the AUC's initiative in seeking feedback from stakeholders regarding the implementation of the approval pause. It is evident that decisions of this nature have significant implications for our province's energy landscape and future sustainability.

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In light of the aforementioned challenges and potential setbacks, I believe that the decision to pause the approval process is prudent. This temporary pause not only acknowledges the need for reform but also allows for a comprehensive review that ensures all aspects of the process are thoroughly examined and improved upon.

In conclusion, I support **Option 1** due to the necessity of a comprehensive review that addresses the current shortcomings in the renewable energy approval process. The ultimate goal should be to establish a more transparent, participatory, and efficient process that encourages meaningful stakeholder input and promotes responsible renewable energy development in our province. At the moment, there simply is not enough in depth research as to whether or not we are moving forward with renewables in the best way possible. There needs to be a thorough evaluation into how the process is done, who is affected, whether the benefits outweigh the risks, and whether there are better alternatives than what is currently proposed.

Thank you for considering my feedback on this critical matter. I appreciate the AUC's dedication to fostering a more sustainable energy future for Alberta, and I look forward to witnessing the positive changes that will arise from this review.

Sincerely,

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Dear Alberta Utilities Commission,



I am writing to provide my input and perspective on the recent announcement by the Alberta Utilities Commission regarding the temporary pause on approvals for new renewable electricity generation projects. As a concerned stakeholder, I believe it is crucial to share my thoughts on this matter.

Firstly, I appreciate the AUC's initiative in seeking feedback from stakeholders regarding the implementation of the approval pause. It is evident that decisions of this nature have significant implications for our province's energy landscape and future sustainability.

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Thank you for considering my feedback on this critical matter. I appreciate the AUC's dedication to fostering a more sustainable energy future for Alberta, and I look forward to witnessing the positive changes that will arise from this review.

Sincerely,

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Dear AUC Members,

I am writing as a concerned Albertan resident in response to your stakeholder feedback request, dated August 3, 2023<sup>1</sup>. **I respectfully request that the AUC end the pause and immediately recommence approvals for renewable energy projects greater than 1MW.** I believe the decision to pause renewable projects of greater than 1MW is unnecessary, will threaten thousands of jobs, will increase electricity costs for all ratepayers, will stifle billions of dollars in investment, and will slow efforts to address climate change. Alberta is the solar powerhouse of Canada, and we need to maintain our competitive edge.

I understand that you have a number of concerns you are seeking to address<sup>2</sup>:

- With respect to **land reclamation** concerns, please note that solar sites will remain viable well past the end of life of the original panels, and this will significantly reduce land reclamation needs. Additionally, The Government of Alberta already has reclamation [Guidelines for Renewable Energy Operations](#) which address this matter.
- With respect to **end of life** concerns for renewable energy infrastructure disposal, the Alberta Recycling Management Authority (ARMA) is already piloting reuse and recycle programs for solar PV. Given that the majority of solar being installed today will be in operation for well over 25 years, ARMA is really out ahead on this matter.



- With respect to **land use** concerns, such as food security, wetland preservation and wildlife conservation, Solar Alberta has already created highly relevant Solar Siting Recommendations: <https://solaralberta.ca/solar-siting-recommendations/>. I believe you could review and adopt protocols such as these without a pause on approvals.

If the Government of Alberta and the AUC are unwilling to immediately end the pause, I respectfully request that you continue to fully process new and existing excluded applications without issuing any approvals until after the pause period (Option 3 in your announcement).

Thank you for considering my request.

Sincerely,

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Dear Alberta Utilities Commission,

I am writing to provide my input and perspective on the recent announcement by the Alberta Utilities Commission regarding the temporary pause on approvals for new renewable electricity generation projects. As a concerned stakeholder, I believe it is crucial to share my thoughts on this matter.

Firstly, I appreciate the AUC's initiative in seeking feedback from stakeholders regarding the implementation of the approval pause. It is evident that decisions of this nature have significant implications for our province's energy landscape and future sustainability.

In response to the options presented, I am in favor of **Option 1**, which involves a comprehensive review of the entire process. My rationale for supporting this option is rooted in the belief that the current approach necessitates a thorough re-evaluation. Several factors contribute to this viewpoint.

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In light of the aforementioned challenges and potential setbacks, I believe that the decision to pause the approval process is prudent. This temporary pause not only acknowledges the need for reform but also allows for a comprehensive review that ensures all aspects of the process are thoroughly examined and improved upon.

In conclusion, I support **Option 1** due to the necessity of a comprehensive review that addresses the current shortcomings in the renewable energy approval process. The ultimate goal should be to establish a more transparent, participatory, and efficient process that encourages meaningful stakeholder input and promotes responsible renewable energy development in our province.

Thank you for considering my feedback on this critical matter. I appreciate the AUC's dedication to fostering a more sustainable energy future for Alberta, and I look forward to witnessing the positive changes that will arise from this review.

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Many mistakes were made by other provinces as they rushed to adopt green energy sources. Alberta has the advantage of being able to learn from them, and should be able to provide a much better framework- one that leads the country. Prudence and consideration are the backbone of setting the right policies, and cannot be understated.

In conclusion, I support **Option 1** due to the necessity of a comprehensive review that addresses the current shortcomings in the renewable energy approval process. The ultimate goal should be to establish a more transparent, participatory, and efficient process that encourages meaningful stakeholder input and promotes responsible renewable energy development in our province.

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Dear Alberta Utilities Commission,

As an engaged and concerned resident of Alberta, I am compelled to write in response to your recent stakeholder feedback request dated August 3, 2022. I implore the AUC to swiftly terminate the ongoing pause and reinstate the approvals process for renewable energy projects. This hiatus serves no justifiable purpose, jeopardizes employment prospects for thousands, threatens to escalate electricity expenses for ratepayers, impedes the flow of billions of dollars in potential investment. Alberta's stature as the solar powerhouse of Canada is one to safeguard.

With regard to apprehensions surrounding land reclamation, I would like to bring to your attention that solar sites retain their viability well beyond the lifespan of the initial panels. The overall footprint of reclaimable land is a fraction of a fraction of the reclamation required on abandoned wells, and can easily be addressed in lease contracts with the private landowners to suit their requirements. Additionally, I wish to highlight that the Government of Alberta has already laid down comprehensive Guidelines for Renewable Energy Operations, directly tackling this concern. Addressing the concerns associated with land use, the AUC has strict provisions for environmental and biological studies and requirements. The choice of private landowners as to the productive use of their land is a decision made by them, not the government. It's the same as a farmer deciding to harvest wheat, canola or sunshine. Should the Government of Alberta and the AUC find it challenging to terminate the pause promptly, I propose that you continue processing new and existing applications that were already submitted before the pause.

Thank you for your invaluable time and consideration.

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Camrose County has reviewed the pause options of: complete abeyance, partial abeyance, and approval hold only, outlined in your August 3, 2023 announcement and have made the following motion supporting Approval Hold Only.



#259/23

D. SIMPSON - That Council provide a letter to the Alberta Utilities Commission (AUC) indicating that Camrose County support the Approval Hold Only option to reduce the potential economic hardships caused by delaying the process, minimizing the backlog that could be created by the delay and ensuring the existing public engagement work continues in a timely fashion for landowners adjacent to projects already in process.

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Dear Alberta Utilities Commission,

I am writing to provide my input and perspective on the recent announcement by the Alberta Utilities Commission regarding the temporary pause on approvals for new renewable electricity generation projects. As a concerned stakeholder, I believe it is crucial to share my thoughts on this matter.

Firstly, I appreciate the AUC's initiative in seeking feedback from stakeholders regarding the implementation of the approval pause. It is evident that decisions of this nature have significant implications for our province's energy landscape and future sustainability.

In response to the options presented, I am in favor of **Option 1**, which involves a comprehensive review of the entire process. My rationale for supporting this option is rooted in the belief that the current approach necessitates a thorough re-evaluation. Several factors contribute to this viewpoint.

The concerns I have pertain to the entire renewable energy approval process, ranging from the signing of lease options prior to public consultation, to the limited input provided by communities on AEPA environmental referral reports, and the rigid legal expert requirements stipulated by the AUC. This combination of factors makes it challenging for the public to meaningfully participate in a cost-effective manner. Consequently, I believe that a comprehensive review, conducted through a public inquiry, is necessary to address these issues comprehensively.



Given the complexities and intricacies involved, I am apprehensive about the efficacy of continuing with the approval review process as outlined in Options 2 and 3. If the AUC proceeds with accepting applications and executes partial processes under the existing guidelines, it could imply that substantive changes are unlikely. However, if substantial modifications are eventually introduced, re-evaluating all submitted applications would be an inefficient utilization of time and resources for both applicants and the AUC.

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In conclusion, I support **Option 1** due to the necessity of a comprehensive review that addresses the current shortcomings in the renewable energy approval process. The ultimate goal should be to establish a more transparent, participatory, and efficient process that encourages meaningful stakeholder input and promotes responsible renewable energy development in our province.

Thank you for considering my feedback on this critical matter. I appreciate the AUC's dedication to fostering a more sustainable energy future for Alberta, and I look forward to witnessing the positive changes that will arise from this review.

Sincerely,

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To whom it may concern,

I, on behalf of Joss Wind Power, would like to express our support for the **Approval Hold Only** implementation of the renewables approval pause. It is our opinion that, given the stated intent of this approval pause, renewables developers should be allowed to continue with applications at their own risk, and with the understanding that changes to the approval process could occur during this time.

Regards,

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Dear AUC Members,



Please find attached a letter from our President, XXXXXXXXX in response to your stakeholder feedback request, dated August 3, 2023. Please also find attached our Solar Siting Recommendations for Municipalities and Project Developers which are referenced in the letter from our President.

The letter from our President states that, **we respectfully request that the AUC end the pause and immediately recommence approvals for renewable energy projects greater than 1MW.** We believe the decision to pause renewable projects greater than 1 MW is unnecessary, will threaten thousands of jobs, will increase electricity costs for all ratepayers, will stifle billions of dollars in investment, and will slow efforts to address climate change.

Solar Alberta is a nonprofit society that has been in operation since 1991. We are an industry and community hub - serving over 900 individual and business members, and have over 20,000 followers in communities across the province. Our mission is to accelerate Alberta's transition to a just and sustainable energy future. We understand that you have a number of concerns you are seeking to address:

- 
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- **land**
- **reclamation**
- concerns, please note that solar sites will remain viable well past the end of life of the original panels, and this will significantly reduce land reclamation needs. Additionally, the Government of Alberta already has reclamation
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- **land use**
- concerns, such as food security, wetland preservation and wildlife conservation, Solar Alberta has already created highly relevant
- [Solar](#)
- [Siting Recommendations](#) (attached to this submission).
- We believe you could review and adopt protocols such as these without a pause on approvals.
- 

If the Government of Alberta and the AUC are unwilling to immediately end the pause, we respectfully request that you continue to fully process new and existing excluded applications without issuing any approvals until after the pause period (Option 3 in your Announcement).



Thank you for considering our request. As an organization with critical knowledge and experience working alongside the public and industry to advance renewable energy in Alberta, we believe we are well-positioned to amplify the voices of the community we represent. We look forward to continued discussion with you on these matters, and sincerely hope this discussion will continue without a pause on approvals.

**Sincerely,**

---

Dear Alberta Utilities Commission,

I am deeply concerned by the pause that has been implemented on approvals of new renewable energy project developments. I do not think the pause is justified. This has been applied to all projects that use wind, solar, geothermal, biomass, and hydroelectric, while sparing fossil fuels. The arguments for this brought by the Premier (e.g. <https://www.cbc.ca/news/canada/calgary/danielle-smith-wind-and-solar-moratorium-reasoning-1.6929617>) are completely inadequate. It is extremely hard to imagine a plausible justification for pausing approvals of all renewable projects (covering a wide range of types of projects) while allowing fossil fuel projects, apart from a nakedly political attempt to help fossil fuel industries by reducing their competition.

This is simply not how responsible governments behave. Responsible governments allow for free and open competition between and among corporations, implementing regulations on industries only to address specific, clearly identified issues. Implementing regulations specifically for political reasons will dramatically reduce Alberta's appeal to investors, not just in our booming renewable energy market which is directly affected, but also in other sectors of the economy which see that the government plays favourites and is willing to enact wholly unnecessary regulatory delays.

I request that the AUC reconsider implementing this pause. Please consider each proposed project on its own merits, and do not crush a thriving Alberta industry.

Sincerely yours,

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Dear AUC Members,

I am writing as a concerned Albertan resident in response to your stakeholder feedback request, dated August 3, 2023<sup>1</sup>. **I respectfully request that the AUC end the pause and immediately recommence approvals for renewable energy projects greater than 1MW.** I believe the decision to pause renewable projects of greater than 1MW<sup>2</sup> is unnecessary, will threaten thousands of jobs, will increase electricity costs for all ratepayers, will stifle billions of dollars in investment, and will slow efforts to address climate change. Alberta is the solar powerhouse of Canada, and we need to maintain our competitive edge.

I understand that you have a number of concerns you are seeking to address<sup>3</sup>:

- With respect to **land reclamation** concerns, please note that solar sites will remain viable well past the end of life of the original panels, and this will significantly reduce land reclamation needs. Additionally, The Government of Alberta already has reclamation [Guidelines for Renewable Energy Operations](#) which address this matter.
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# AUC

Alberta Utilities Commission

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In response to the options presented, I am in favor of **Option 1**, which involves a comprehensive review of the entire process. My rationale for supporting this option is rooted in the belief that the current approach necessitates a thorough re-evaluation. Several factors contribute to this viewpoint.

The concerns I have pertain to the entire renewable energy approval process, ranging from the signing of lease options prior to public consultation, to the limited input provided by communities on AEPA environmental referral reports, and the rigid legal expert requirements stipulated by the AUC. This



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In light of the aforementioned challenges and potential setbacks, I believe that the decision to pause the approval process is prudent. This temporary pause not only acknowledges the need for reform but also allows for a comprehensive review that ensures all aspects of the process are thoroughly examined and improved upon.

In conclusion, I support **Option 1** due to the necessity of a comprehensive review that addresses the current shortcomings in the renewable energy approval process. The ultimate goal should be to establish a more transparent, participatory, and efficient process that encourages meaningful stakeholder input and promotes responsible renewable energy development in our province.

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approval process. The ultimate goal should be to establish a more transparent, participatory, and efficient process that encourages meaningful stakeholder input and promotes responsible renewable energy development in our province.

Thank you for considering my feedback on this critical matter. I appreciate the AUC's dedication to fostering a more sustainable energy future for Alberta, and I look forward to witnessing the positive changes that will arise from this review.

Sincerely,

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Dear AUC Members,

As an Albertan ratepayer and solar industry worker, I am writing in response to your stakeholder feedback request dated August 3, 2023. I respectfully request that the AUC end the pause and immediately recommence approvals for renewable energy projects greater than 1MW. I believe the decision to pause renewable projects of greater than 1MW is unnecessary, will threaten thousands of jobs (including those of young Albertans such as myself), will increase electricity costs for all ratepayers, will stifle billions of dollars in investment, and will slow efforts to address climate change. Alberta is the solar powerhouse of Canada, and we need to maintain our competitive edge.

I understand that you have a number of concerns you are seeking to address:

- With respect to land reclamation concerns, please note that solar sites will remain viable well past the end of life of the original panels, and this will significantly reduce land reclamation needs. Additionally, The Government of Alberta already has reclamation Guidelines for Renewable Energy Operations which address this matter.
- With respect to end of life concerns for renewable energy infrastructure disposal, the Alberta Recycling Management Authority (ARMA) is already piloting reuse and recycle programs for solar PV. Given that the majority of solar being installed today will be in operation for well over 25 years, ARMA is really out ahead on this matter.
- With respect to land use concerns, it should be noted that development often occurs on privately owned land and development permits are issued by the municipality.
- If the Government of Alberta and the AUC are unwilling to immediately end the pause, I respectfully request that you continue to fully process new and existing excluded applications without issuing any approvals until after the pause period (Option 3 in your announcement).

I request that you act on your mission to deliver innovative and efficient regulatory solutions and your impartial and objective values to act independently of political interest and in a manner that is fair and progressive to all Albertans. Thank you for considering my request.

Sincerely,

---

Dear AUC Members,

I am writing as a concerned Albertan resident in response to your stakeholder feedback request, dated August 3, 2023. I respectfully request that the AUC end the pause and immediately recommence approvals for renewable energy projects greater than 1MW. I believe the decision to pause renewable projects of greater than 1MW is unnecessary, will threaten thousands of jobs, will increase electricity costs for all ratepayers, will stifle billions of dollars in investment, and will slow efforts to address climate change. Alberta is the solar powerhouse of Canada, and we need to maintain our competitive edge.

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With respect to land use concerns, such as food security, wetland preservation and wildlife conservation, Solar Alberta has already created highly relevant Solar Siting Recommendations: <https://solaralberta.ca/solar-siting-recommendations/>. I believe you could review and adopt protocols such as these without a pause on approvals.

If the Government of Alberta and the AUC are unwilling to immediately end the pause, I respectfully request that you continue to fully process new and existing excluded applications without issuing any approvals until after the pause period (Option 3 in your announcement).

Thank you for considering my request.

Sincerely,

---

Dear Alberta Utilities Commission,

I am writing to provide my input and perspective on the recent announcement by the Alberta Utilities Commission regarding the temporary pause on



approvals for new renewable electricity generation projects. As a concerned stakeholder, I believe it is crucial to share my thoughts on this matter.

Firstly, I appreciate the AUC's initiative in seeking feedback from stakeholders regarding the implementation of the approval pause. It is evident that decisions of this nature have significant implications for our province's energy landscape and future sustainability.

In response to the options presented, I am in favor of **Option 1**, which involves a comprehensive review of the entire process. My rationale for supporting this option is rooted in the belief that the current approach necessitates a thorough re-evaluation. Several factors contribute to this viewpoint.

The concerns I have pertain to the entire renewable energy approval process, ranging from the signing of lease options prior to public consultation, to the limited input provided by communities on AEPA environmental referral reports, and the rigid legal expert requirements stipulated by the AUC. This combination of factors makes it challenging for the public to meaningfully participate in a cost-effective manner. Consequently, I believe that a comprehensive review, conducted through a public inquiry, is necessary to address these issues comprehensively.

Given the complexities and intricacies involved, I am apprehensive about the efficacy of continuing with the approval review process as outlined in Options 2 and 3. If the AUC proceeds with accepting applications and executes partial processes under the existing guidelines, it could imply that substantive changes are unlikely. However, if substantial modifications are eventually introduced, re-evaluating all submitted applications would be an inefficient utilization of time and resources for both applicants and the AUC.

In light of the aforementioned challenges and potential setbacks, I believe that the decision to pause the approval process is prudent. This temporary pause not only acknowledges the need for reform but also allows for a comprehensive review that ensures all aspects of the process are thoroughly examined and improved upon.



In conclusion, I support **Option 1** due to the necessity of a comprehensive review that addresses the current shortcomings in the renewable energy approval process. The ultimate goal should be to establish a more transparent, participatory, and efficient process that encourages meaningful stakeholder input and promotes responsible renewable energy development in our province.

Thank you for considering my feedback on this critical matter. I appreciate the AUC's dedication to fostering a more sustainable energy future for Alberta, and I look forward to witnessing the positive changes that will arise from this review.

Sincerely,

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Hi,

In response to AUC's August 3rd announcement, I wish to express my support for the 'Approval Hold Only' option. Better yet, advance approval decisions to all projects in the queue but pause new applications. Pause to cease no later than Feb 29, 2024.

Government and Industry need to work together on the approvals framework in order to harness mutual benefits. Developer investment in Alberta will cease if there is uncertainty. Just look over to Doug Ford's Ontario.. ie: The White Pines Project Termination Act and the cancellation of the LRP (July 10th and July 5th, 2018, respectively). These actions created uncertainty. To this day, very little project development work is ongoing in Ontario and the manufacturing plants supporting these projects have shut down.

Thank you,

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Dear AUC Members,

I am writing as a concerned Albertan resident in response to your stakeholder feedback request, dated August 3, 2023<sup>1</sup>. **I respectfully request that the AUC end the pause and immediately recommence approvals for renewable energy projects greater than 1MW.** I believe the decision to pause renewable projects of greater than 1MW<sup>2</sup> is unnecessary, will threaten thousands of jobs, will increase electricity costs for all ratepayers, will stifle billions of dollars in investment, and will slow efforts to address climate change. Alberta is the solar powerhouse of Canada, and we need to maintain our competitive edge.

I understand that you have a number of concerns you are seeking to address<sup>3</sup>:



# AUC

Alberta Utilities Commission

- With respect to **land reclamation** concerns, please note that solar sites will remain viable well past the end of life of the original panels, and this will significantly reduce land reclamation needs. Additionally, The Government of Alberta already has reclamation [Guidelines for Renewable Energy Operations](#) which address this matter.
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If the Government of Alberta and the AUC are unwilling to immediately end the pause, I respectfully request that you continue to fully process new and existing excluded applications without issuing any approvals until after the pause period (Option 3 in your announcement). Thank you for considering my request.

Sincerely,

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Dear Alberta Utilities Commission,

I am writing to provide my input and perspective on the recent announcement by the Alberta Utilities Commission regarding the temporary pause on approvals for new renewable electricity generation projects. As a concerned stakeholder, I believe it is crucial to share my thoughts on this matter.

Firstly, I appreciate the AUC's initiative in seeking feedback from stakeholders regarding the implementation of the approval pause. It is evident that decisions of this nature have significant implications for our province's energy landscape and future sustainability.

In response to the options presented, I am in favor of **Option 1**, which involves a comprehensive review of the entire process. My rationale for supporting this option is rooted in the belief that the current approach necessitates a thorough re-evaluation. Several factors contribute to this viewpoint.



The concerns I have pertain to the entire renewable energy approval process, ranging from the signing of lease options prior to public consultation, to the limited input provided by communities on AEPA environmental referral reports, and the rigid legal expert requirements stipulated by the AUC. This combination of factors makes it challenging for the public to meaningfully participate in a cost-effective manner. Consequently, I believe that a comprehensive review, conducted through a public inquiry, is necessary to address these issues comprehensively.

Given the complexities and intricacies involved, I am apprehensive about the efficacy of continuing with the approval review process as outlined in Options 2 and 3. If the AUC proceeds with accepting applications and executes partial processes under the existing guidelines, it could imply that substantive changes are unlikely. However, if substantial modifications are eventually introduced, re-evaluating all submitted applications would be an inefficient utilization of time and resources for both applicants and the AUC.

In light of the aforementioned challenges and potential setbacks, I believe that the decision to pause the approval process is prudent. This temporary pause not only acknowledges the need for reform but also allows for a comprehensive review that ensures all aspects of the process are thoroughly examined and improved upon.

In conclusion, I support **Option 1** due to the necessity of a comprehensive review that addresses the current shortcomings in the renewable energy approval process. The ultimate goal should be to establish a more transparent, participatory, and efficient process that encourages meaningful stakeholder input and promotes responsible renewable energy development in our province.

Thank you for considering my feedback on this critical matter. I appreciate the AUC's dedication to fostering a more sustainable energy future for Alberta, and I look forward to witnessing the positive changes that will arise from this review.

Sincerely,

Dear AUC Members,

I am writing as a concerned Albertan resident in response to your stakeholder feedback request, dated August 3, 2023<sup>1</sup>. **I respectfully request that the AUC end the pause and immediately recommence approvals for renewable energy projects greater than 1MW.** I believe the decision to pause renewable projects of greater than 1MW<sup>2</sup> is unnecessary, will threaten thousands of jobs, will increase electricity costs for all ratepayers, will stifle billions of dollars in investment, and will slow efforts to address climate change. Alberta is the solar powerhouse of Canada, and we need to maintain our competitive edge. I understand that you have a number of concerns you are seeking to address<sup>3</sup>:

- With respect to **land reclamation** concerns, please note that solar sites will remain viable well past the end of life of the original panels, and this will significantly reduce land reclamation needs. Additionally, The Government of Alberta already has reclamation [Guidelines for Renewable Energy Operations](#) which address this matter.
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If the Government of Alberta and the AUC are unwilling to immediately end the pause, I respectfully request that you continue to fully process new and existing excluded applications without issuing any approvals until after the pause period (Option 3 in your announcement).

Thank you for considering my request.

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Dear AUC Members,

I am writing as a concerned Albertan resident in response to your stakeholder feedback request, dated August 3, 2023<sup>1</sup>. **I strongly implore that the AUC end the pause and immediately recommence approvals for renewable energy projects greater than 1MW.** I believe the decision to pause renewable projects of greater than 1MW<sup>2</sup> is unnecessary, will threaten thousands of jobs, will increase electricity costs for all ratepayers, will stifle billions of dollars in



investment, and will slow efforts to address climate change. Alberta is the solar powerhouse of Canada, and we need to maintain our competitive edge.

**We also desperately need to diversify our economy for the prosperity of our citizens into the future as the demand for fossil fuels inevitably wanes. This decision puts Alberta's reputation as a great place to live and safe place to invest at significant risk.**

I understand that you have a number of concerns you are seeking to address<sup>3</sup>:

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If the Government of Alberta and the AUC are unwilling to immediately end the pause, I respectfully request that you continue to fully process new and existing excluded applications without issuing any approvals until after the pause period (Option 3 in your announcement).

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# AUC

Alberta Utilities Commission

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If the Government of Alberta and the AUC are unwilling to immediately end the pause, I respectfully request that you continue to fully process new and existing excluded applications without issuing any approvals until after the pause period (Option 3 in your announcement).

Thank you for considering my request.

Sincerely,

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Dear Alberta Utilities Commission,

- > I am writing to provide my input and perspective on the recent announcement by the Alberta Utilities Commission regarding the temporary pause on approvals for new renewable electricity generation projects. As a concerned stakeholder, I believe it is crucial to share my thoughts on this matter.
- > Firstly, I appreciate the AUC's initiative in seeking feedback from stakeholders regarding the implementation of the approval pause. It is evident that decisions of this nature have significant implications for our province's energy landscape and future sustainability.
- > In response to the options presented, I am in favor of Option 1, which involves a comprehensive review of the entire process. My rationale for supporting this option is rooted in the belief that the current approach necessitates a thorough re-evaluation. Several factors contribute to this viewpoint.
- > The concerns I have pertain to the entire renewable energy approval process, ranging from the signing of lease options prior to public consultation, to the limited input provided by communities on AEPA environmental referral reports, and the rigid legal expert requirements stipulated by the AUC. This combination of factors makes it challenging for the public to meaningfully participate in a cost-effective manner. Consequently, I believe that a comprehensive review, conducted through a public inquiry, is necessary to address these issues comprehensively.
- > Given the complexities and intricacies involved, I am apprehensive about the efficacy of continuing with the approval review process as outlined in Options 2 and 3. If the AUC proceeds with accepting applications and executes partial processes under the existing guidelines, it could imply that substantive changes are unlikely. However, if substantial modifications are eventually introduced, re-evaluating all submitted applications would be an inefficient utilization of time and resources for both applicants and the AUC.
- > In light of the aforementioned challenges and potential setbacks, I believe that the decision to pause the approval process is prudent. This temporary pause not only acknowledges the need for reform but also allows for a comprehensive review that ensures all aspects of the process are thoroughly examined and improved upon.
- > In conclusion, I support Option 1 due to the necessity of a comprehensive review that addresses the current shortcomings in the renewable energy approval process. The ultimate goal should be to establish a more transparent, participatory, and efficient process that encourages meaningful stakeholder input and promotes responsible renewable energy development in our province.
- > Thank you for considering my feedback on this critical matter. I appreciate the AUC's dedication to fostering a more sustainable energy future for Alberta, and I look forward to witnessing the positive changes that will arise from this review.

Dear AUC Members,

I am writing as a concerned Albertan resident in response to your stakeholder feedback request, dated August 3, 2023<sup>1</sup>. **I respectfully request that the AUC end the pause and immediately recommence approvals for renewable energy projects greater than 1MW.** I believe the decision to pause renewable projects of greater than 1MW<sup>2</sup> is unnecessary, will threaten thousands of jobs, will increase electricity costs for all ratepayers, will stifle billions of dollars in investment, and will slow efforts to address climate change. Alberta is the solar powerhouse of Canada, and we need to maintain our competitive edge.

I understand that you have a number of concerns you are seeking to address<sup>3</sup>:

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If the Government of Alberta and the AUC are unwilling to immediately end the pause, I respectfully request that you continue to fully process new and existing excluded applications without issuing any approvals until after the pause period (Option 3 in your announcement). Thank you for considering my request.

Sincerely,

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Good Morning,

I am typing this email in response to the Alberta Government's pause on the development of renewable resources in our province. I wouldn't have given it much thought in the past but as of this February, my family and our newly purchased acreage were thrust into the middle of the debate.

We moved to our forever home in May of 2022, and in February of 2023, ABO Wind had an open house about their newly proposed wind project in the Smoky River MD. The whole event has caused us to



meet our neighbours a lot faster than we expected, but in true rural folk fashion, they rallied around our little acreage that sits smack-dab in the middle of the proposed project. We had never given much thought to wind power because we are quite comfortable with our oil and gas lifestyle, but the way of the world is changing so we joined with our neighbours to see what it was all about.

You will likely get all sorts of letters citing pro's and con's of renewable energy and you are probably aware of both sides. I have a different perspective. I would like to share our experience. I would like to share with you how I think that this project has divided our community.

It is my understanding that ABO Wind approached major landowners in 2018-2019 about signing contracts to have these turbines on their property. Now, I agree that landowners do have a right to do what they want with what they own. I come from a multigenerational farm in Saskatchewan so the independent ability to manage your land well is of significant importance. But I am concerned about community perceptions in the renewable energy project process. With other building projects within the community, landowners have to run project proposals by their MD council, the public is notified and there is opportunity for public debate. This type of approach is better for community building. The fact that landowners signed up years before the wind project was public knowledge has caused a lot of suspicion among neighbours and to some extent, even within families. Add to that nondisclosure agreements and the suspicion increases. Open and honest communication is the best option in neighbourhoods, especially in rural neighbourhoods where we depend on one another.

If there was the chance for open communication, then there might be better problem solving when it comes to the obstacles and objections to such significant projects. For example, we are located next to a large chunk of crown land that has a transmission line running through it. My husband asked ABO why they weren't moving the project in that direction. They stated that they would like to but the regulatory hoops that they needed to jump through was not worth the effort. If all parties; ABO, local government, provincial government, landowners and their neighbours were all aware of such issues, we may have corporately been able to come up with a solution that did not damage community relations while allowing the project to go ahead. If given the opportunity, and maybe with some proper mediation, everyone would have come out the other side of the discussion with relationships intact.

I am in agreement with a complete abeyance on renewable energy projects in the province of Alberta. It is my hope that during your review of policy that you would keep in mind how policy affects relationship. In our research about wind power, it has been the breakdown of relationship that has stood out the most. Maybe it's nostalgic thinking attached to growing up in rural Saskatchewan that makes this such an emotional topic for me. In rural setting you know your neighbours, you communicate with your neighbour, you work with your neighbours and you help your neighbours even if you didn't always agree with them. It is part of the human experience. Community is part of the human experience.

Sincerely,

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Dear AUC Members,

I am writing as a concerned Albertan resident in response to your stakeholder feedback request, dated August 3, 2023<sup>1</sup>. **I respectfully request that the AUC end the pause and immediately recommence approvals for renewable energy projects greater than 1MW.** I believe the decision to pause renewable projects of greater than 1MW<sup>2</sup> is unnecessary, will threaten thousands of jobs, will increase electricity costs for all ratepayers, will stifle billions of dollars in investment, and will slow efforts to address climate change. Alberta is the solar powerhouse of Canada, and we need to maintain our competitive edge.

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If the Government of Alberta and the AUC are unwilling to immediately end the pause, I respectfully request that you continue to fully process new and existing excluded applications without issuing any approvals until after the pause period (Option 3 in your announcement).

I've also started an online petition that is gaining momentum fast, you can read it here:

<https://www.change.org/p/restart-renewable-projects-in-alberta-immediately?redirect=false>



### [Sign the Petition](#)

Restart Renewable Projects in Alberta  
Immediately!

[www.change.org](http://www.change.org)

Thank you for considering my request.  
Sincerely,

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I am writing as a concerned Albertan resident in response to your stakeholder feedback request, dated August 3, 2023<sup>1</sup>. **I respectfully request that the AUC end the pause and immediately recommence approvals for renewable energy projects greater than 1MW.** I believe the decision to pause renewable projects of greater than 1MW<sup>2</sup> is unnecessary, will threaten thousands of jobs, will increase electricity costs for all ratepayers, will stifle billions of dollars in investment, and will slow efforts to address climate change (not to mention, make us the laughing stock of the entire country). Alberta is the solar powerhouse of Canada, and we need to maintain our competitive edge.

I understand that you have a number of concerns you are seeking to address<sup>3</sup>:

- With respect to **land reclamation** concerns, please note that solar sites will remain viable well past the end of life of the original panels, and this will significantly reduce land reclamation needs. Additionally, The Government of Alberta already has reclamation [Guidelines for Renewable Energy Operations](#) which address this matter.
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- Do you have these same concerns when it comes to orphan well clean up? If so, what are you doing to remedy this?

If the Government of Alberta and the AUC are unwilling to immediately end the pause, I respectfully request that you continue to fully process new and existing excluded applications without issuing any approvals until after the pause period (Option 3 in your announcement).

Thank you for considering my request.

Sincerely,

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climate change (not to mention, make us the laughing stock of the entire country). Alberta is the solar powerhouse of Canada, and we need to maintain our competitive edge.

I understand that you have a number of concerns you are seeking to address<sup>3</sup>:

- With respect to **land reclamation** concerns, please note that solar sites will remain viable well past the end of life of the original panels, and this will significantly reduce land reclamation needs. Additionally, The Government of Alberta already has reclamation [Guidelines for Renewable Energy Operations](#) which address this matter.
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- Do you have these same concerns when it comes to orphan well clean up? If so, what are you doing to remedy this?

If the Government of Alberta and the AUC are unwilling to immediately end the pause, I respectfully request that you continue to fully process new and existing excluded applications without issuing any approvals until after the pause period (Option 3 in your announcement).

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Dear Alberta Utilities Commission,

I am writing to provide my input and perspective on the recent announcement by the Alberta Utilities Commission regarding the temporary pause on approvals for new renewable electricity generation projects. As a concerned stakeholder, I believe it is crucial to share my thoughts on this matter.

Firstly, I appreciate the AUC's initiative in seeking feedback from stakeholders regarding the implementation of the approval pause. It is evident that decisions of this nature have significant implications for our province's energy landscape and future sustainability.

In response to the options presented, I am in favor of **Option 1**, which involves a comprehensive review of the entire process. My rationale for supporting this option is rooted in the belief that the current approach necessitates a thorough re-evaluation. Several factors contribute to this viewpoint.

The concerns I have pertain to the entire renewable energy approval process, ranging from the signing of lease options prior to public consultation, to the limited input provided by communities on AEPA environmental referral reports, and the rigid legal expert requirements stipulated by the AUC. This combination of factors makes it challenging for the public to meaningfully participate in a cost-effective manner. Consequently, I believe that a comprehensive review, conducted through a public inquiry, is necessary to address these issues comprehensively.

Given the complexities and intricacies involved, I am apprehensive about the efficacy of continuing with the approval review process as outlined in Options 2 and 3. If the AUC proceeds with accepting applications and executes partial processes under the existing guidelines, it could imply that substantive



changes are unlikely. However, if substantial modifications are eventually introduced, re-evaluating all submitted applications would be an inefficient utilization of time and resources for both applicants and the AUC.

In light of the aforementioned challenges and potential setbacks, I believe that the decision to pause the approval process is prudent. This temporary pause not only acknowledges the need for reform but also allows for a comprehensive review that ensures all aspects of the process are thoroughly examined and improved upon.

In conclusion, I support **Option 1** due to the necessity of a comprehensive review that addresses the current shortcomings in the renewable energy approval process. The ultimate goal should be to establish a more transparent, participatory, and efficient process that encourages meaningful stakeholder input and promotes responsible renewable energy development in our province.

Thank you for considering my feedback on this critical matter. I appreciate the AUC's dedication to fostering a more sustainable energy future for Alberta, and I look forward to witnessing the positive changes that will arise from this review.

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Hello AUC,

This is my official letter that I am opposing to the implementation of the pause on approvals for renewable energy projects.

I am heavily involved in renewable energy education in a post-secondary institution and this move will inevitably affect enrolment. When people are uncertain about an industry they don't want to invest their time and money in it.

This could result in me losing my job, but also instructors could also lose revenues. This can negatively impact each of the communities where I and those instructors live.

I would like this to be my official feedback notice.

Regards,

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# AUC

Alberta Utilities Commission

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I've made a video about the benefits of rooftop solar in Alberta. Please watch it to educate yourself. <https://youtu.be/HAhvqkSHjBE>

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Alberta Utilities Commission

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Alberta Utilities Commission

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Alberta Utilities Commission

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I belong to a solar energy cooperative in the Peace region, we were a week away from our turn to be reviewed through the AUC when this moratorium suddenly brought everything to an abrupt halt. We are proposing a small 5 Megawatt solar farm which would have meant jobs and clean energy for the Peace region. This pause is completely unnecessary and an added expense and burden to our cooperative.

Alberta is the solar powerhouse of Canada, and we need to maintain our competitive edge.

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Dear AUC Members,

I am writing as a concerned Albertan resident in response to your stakeholder feedback request, dated August 3, 2023<sup>1</sup>. This email is based on a Solar Alberta template, with some editing, but as edited it accurately reflects my individual opinion.

The AUC should end the pause on renewable project approvals, and immediately recommence approvals for renewable energy projects greater than 1MW. The decision to pause renewable projects of greater than 1MW<sup>2</sup> is unnecessary, and may threaten thousands of jobs, could increase electricity costs for all ratepayers, could stifle billions of dollars in investment, and definitely will slow efforts to address climate change. Alberta is the solar powerhouse of Canada, and we need to maintain our competitive edge. This "pause" casts Alberta in a very poor light to all except those who choose to deny or ignore global warming, the results of which have never been more apparent than this year.

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# AUC

Alberta Utilities Commission

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- With respect to **land use** concerns, such as food security, wetland preservation and wildlife conservation, Solar Alberta has already created highly relevant Solar Siting Recommendations: <https://solaralberta.ca/solar-siting-recommendations/>. These protocols could be adopted without a pause on project reviews and with minimal impact on approvals.

If the Government of Alberta and the AUC are unwilling to immediately end the pause, I respectfully request that you continue to fully process new and existing excluded applications without issuing any approvals until after the pause period (Option 3 in your announcement).

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With respect to land reclamation concerns, please note that solar sites will remain viable well past the end of life of the original panels, and this will significantly reduce land reclamation needs. Additionally, The Government of Alberta already has reclamation Guidelines for Renewable Energy Operations which address this matter.

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Thank you for considering my request.

Sincerely,

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Dear AUC Members,

I am writing as a concerned Albertan land owner in response to your stakeholder feedback request, dated August 3, 2023<sup>1</sup>. **I respectfully request that the AUC end the pause and immediately recommence approvals for renewable energy projects greater than 1MW.** I believe the decision to pause renewable projects of greater than 1MW<sup>2</sup> is unnecessary, will threaten thousands of jobs, will increase electricity costs for all ratepayers, will stifle billions of dollars in investment, and will slow efforts to address climate change. Alberta is the solar powerhouse of Canada, and we need to maintain our competitive edge. The overall impact will have a negative effect on Alberta's economy in both the short and long term.

I understand that you have a number of concerns you are seeking to address<sup>3</sup>:

- With respect to **land reclamation** concerns, please note that solar sites will remain viable well past the end of life of the original panels, and this will significantly reduce land reclamation needs. In twenty five years, the existing solar panels could be replaced with more powerful ones in the same space. Additionally, The Government of Alberta already has reclamation [Guidelines for Renewable Energy Operations](#) which address this matter.
- With respect to **end of life** concerns for renewable energy infrastructure disposal, the Alberta Recycling Management Authority (ARMA) is already piloting reuse and recycle programs for solar PV. Given that the majority of solar being installed today will be in operation for well over 25 years, ARMA is really out ahead on this matter. There is a lot of misinformation about lifespan and recyclability of renewables drowning many corners of the internet. It cannot be permitted to hold Alberta back from a sustainable and prosperous future.



# AUC

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- With respect to **land use** concerns, such as food security, wetland preservation and wildlife conservation, Solar Alberta has already created highly relevant Solar Siting Recommendations: <https://solaralberta.ca/solar-siting-recommendations/>. I believe you could review and adopt protocols such as these without a pause on approvals. I would point out there are dual usages for solar sites already. Smaller herd animals, and fowl control what is grown and use the panels to shelter from the sun. This works on Grade 3 farmland and does not endanger market gardens or prime crop land. This in essence gives farmers two crops off of the same land increasing their profitability and reducing their electrical bills.

If the Government of Alberta and the AUC are unwilling to immediately end the pause, I respectfully request that you continue to fully process new and existing excluded applications without issuing any approvals until after the pause period (Option 3 in your announcement).

Thank you for considering my request.

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With respect,



While the content of this email is a form letter, do not assume I am just lazily forwarding it. Before finding this form letter I had already written to every Alberta MLA (and the Calgary Herald for what it's worth).

It is also extraordinarily ironic that Calgary is hosting Electricity Transformation Canada's conference and exhibition this fall ([electricitytransformation.ca](http://electricitytransformation.ca)). Wow. How awkward is that?

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# AUC

Alberta Utilities Commission

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Thank you for considering my request.

Sincerely,

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Dear AUC Members,

I am writing as a concerned Canadian and former Edmontonian resident of over six years in response to your stakeholder feedback request, dated August 3, 2023<sup>1</sup>. **I respectfully request that the AUC end the pause and immediately recommence approvals for renewable energy projects greater than 1MW.** I believe the decision to pause renewable projects of greater than 1MW<sup>2</sup> is unnecessary, will threaten thousands of jobs, will increase electricity costs for all ratepayers, will stifle billions of dollars in investment, and will slow efforts to address climate change. Alberta is the solar powerhouse of Canada, and you need to maintain your competitive edge, for the sake of staying relevant in this economy.



I've studied this kind of inaction, as imagined by Canadians and woven into existence during the mid-late twentieth century, based on cultural understandings of science and policy available at that time. It ends very, very badly. You're not playing with nuclear warheads but instead carbon emissions - less tangible, perhaps, but more immediately deadly to people worldwide. You don't need to push a button to initiate the apocalypse; it has already begun (just look at what has been happening in Canada this year, in Hawai'i, in the States...). In that light, how will you act? Things will only get worse from here. We have a chance to course-correct and only kill thousands, not millions.

Okay, back to addressing the excuses you're making for inaction:

I understand that you have a number of concerns you are seeking to address<sup>3</sup>:

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If the Government of Alberta and the AUC are unwilling to immediately end the pause, I respectfully request that you continue to fully process new and existing excluded applications without issuing any approvals until after the pause period (Option 3 in your announcement).

Thank you for considering my request. I assume, though, that your offices will send me auto-replies and platitudes. Hopefully this will reach a human being with empathy and wisdom.

Sincerely,

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Dear AUC Members,

I am writing as a concerned Canadian and former Edmontonian resident of over six years in response to your stakeholder feedback request, dated August 3, 2023<sup>1</sup>. **I respectfully request that the AUC end the pause and immediately recommence approvals for renewable energy projects greater than 1MW.** I believe the decision to pause renewable projects of greater than 1MW<sup>2</sup> is unnecessary, will threaten thousands of jobs, will increase electricity costs for all ratepayers, will stifle billions of dollars in investment, and will slow efforts to address climate change. Alberta is the solar powerhouse of Canada, and you need to maintain your competitive edge, for the sake of staying relevant in this economy.

I've studied this kind of inaction, as imagined by Canadians and woven into existence during the mid-late twentieth century, based on cultural understandings of science and policy available at that time. It ends very, very badly. You're not playing with nuclear warheads but instead carbon emissions - less tangible, perhaps, but more immediately deadly to people worldwide. You don't need to push a button to initiate the apocalypse; it has already begun (just look at what has been happening in Canada this year, in Hawai'i, in the States...). In that light, how will you act? Things will only get worse from here. We have a chance to course-correct and only kill thousands, not millions.

Okay, back to addressing the excuses you're making for inaction:

I understand that you have a number of concerns you are seeking to address<sup>3</sup>:

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Thank you for considering my request. I assume, though, that your offices will send me auto-replies and platitudes. Hopefully this will reach a human being with empathy and wisdom.

Sincerely,

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Alberta Utilities Commission

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*With the increasingly high cost of energy utilities to the average consumer, why are you penalizing Albertans for turning to solar/wind in increasing numbers, not only being financially responsible but attempting to decrease our energy footprint. As well as taking jobs from thousands of hardworking Albertans in the industry. Would you put a moratorium on the beef industry, oil companies? Your actions are hypocritical and autocratic, without input from neither those in the industry nor the general public.*

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Thank you for considering my request.

Sincerely,

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- With respect to **land reclamation** concerns, please note that solar sites will remain viable well past the end of life of the original panels, and this will significantly reduce land



# AUC

Alberta Utilities Commission

reclamation needs. Additionally, The Government of Alberta already has reclamation [Guidelines for Renewable Energy Operations](#) which address this matter.

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Thank you for considering my request.

Sincerely,

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Dear AUC Members,

I am writing as a concerned Albertan resident in response to your stakeholder feedback request, dated August 3, 2023. I respectfully request that the AUC end the pause and immediately recommence approvals for renewable energy projects greater than 1MW. I believe the decision to pause renewable projects of greater than 1MW2 is unnecessary, will threaten thousands of jobs, will increase electricity costs for all ratepayers, will stifle billions of dollars in investment, and will slow efforts to address climate change. Alberta is the solar powerhouse of Canada, and we need to maintain our competitive edge.

I understand that you have a number of concerns you are seeking to address:

With respect to land reclamation concerns, please note that solar sites will remain viable well past the end of life of the original panels, and this will significantly reduce land reclamation needs. Additionally, The Government of Alberta already has reclamation Guidelines for Renewable Energy Operations which address this matter.

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Thank you for considering my request.

Sincerely,

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Good Day,



My family and I live on an acreage north of McLennan, Alberta. In light of the Generation Approvals Pause Regulation, I believe that complete abeyance for renewable energy applications should be the option chosen by the AUC. This would appear to be the only reasonable option to my mind as the Government of Alberta has made it clear they have concerns regarding the current regulatory framework around approval of renewable energy projects in Alberta and wish to have further inquiry into this issue, prior to moving forward with renewable energy development in the province. It would seem illogical, wasteful and counterproductive to continue with the approval process for these projects under the current regulatory regime when that regime will obviously be changing in the near future. Let's allow the sought after inquiry to occur, analyse the attained data/information and determine required regulatory processes so we can all get on the same page and move forward together as stakeholders, government and industry on this issue.

Thank you,

---

Dear AUC Members,

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If the Government of Alberta and the AUC are unwilling to immediately end the pause, I respectfully request that you continue to fully process new and existing excluded applications without issuing any approvals until after the pause period (Option 3 in your announcement).

Thank you for considering my request.

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If the Government of Alberta and the AUC are unwilling to immediately end the pause, I respectfully request that you continue to fully process new and existing excluded applications without issuing any approvals until after the pause period (Option 3 in your announcement).

Thank you for considering my request.

Sincerely,

---

Dear Alberta Utility Commission,,

I work in the solar industry. I have developed curriculum and taught solar technologies classes for both NAIT and MacEwan University. A “pause” such as this immediately affects Alberta’s economy, innovative capabilities, reputation with potential investors and the ability to meet climate change mitigation targets. Alberta is endowed with abundant solar and wind resources. Renewables are the key to reducing ratepayer electricity costs.

**Where was the public consultation before the decision was made to pause renewable energy projects greater than 1MW in Alberta? This is a drastic, uninformed, significantly damaging move!**





Alberta is the solar powerhouse of Canada, and we need to maintain the competitive edge. Otherwise Alberta will be left behind as the US and many other countries around the world aggressively move ahead leaving Alberta with limited options using expensive, polluting natural gas.

End the pause now. If the Government of Alberta and the AUC are unwilling to immediately end the pause, I respectfully request that you continue to fully process new and existing excluded applications without issuing any approvals until after the pause period (Option 3 in your announcement).

Respectfully submitted,

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Dear AUC Members,

I am writing as a concerned Albertan resident in response to your stakeholder feedback request, dated August 3, 2023<sup>1</sup>. **I respectfully request that the AUC end the pause and immediately recommence approvals for renewable energy projects greater than 1MW.** I believe the decision to pause renewable projects of greater than 1MW<sup>2</sup> is unnecessary, will threaten thousands of jobs, will increase electricity costs for all ratepayers, will stifle billions of dollars in investment, and will slow efforts to address climate change. Alberta is the solar powerhouse of Canada, and we need to maintain our competitive edge.

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Sincerely,

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Dear AUC Members,

Please do not be UCP political puppets in a fight against Ottawa.

I am writing as a concerned Albertan resident in response to your stakeholder feedback request, dated August 3, 2023<sup>1</sup>. **I respectfully request that the AUC end the pause and immediately recommence approvals for renewable energy projects.**

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*Should this foolishness continue, perhaps the world needs to put pressure on us like they did with the seal fur trade back east.*

Thank you for considering my request.

Sincerely,

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Thank you for considering my request. Please take this seriously and have a decent week.

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Alberta Utilities Commission

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I am writing as a very concerned Albertan resident in response to your stakeholder feedback request, dated August 3, 2023<sup>1</sup>. **I respectfully request that the AUC end the pause and immediately recommence approvals for renewable energy projects greater than 1MW.** I believe the decision to pause renewable projects of greater than 1MW<sup>2</sup> is unnecessary, will threaten thousands of jobs, will increase electricity costs for all ratepayers, will stifle billions of dollars in investment, and will slow efforts to address climate change. Alberta is the solar powerhouse of Canada, and we need to maintain our competitive edge.

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Thank you for considering my request.

Sincerely,

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Dear AUC Members,

I am writing as a concerned (and pissed off) Albertan resident in response to your stakeholder feedback request, dated August 3, 2023<sup>1</sup>.

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Alberta Utilities Commission

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I'm writing today to ask you to end the moratorium on renewable energy project approvals immediately. The rationale for this measure is flawed and clearly political.

1. The renewable energy companies weren't consulted about the proposed moratorium to see if the issues could be addressed without a moratorium. That's bad policy and will turn international investors away from Alberta.

2. The concern about guarantees to clean up renewable energy sites that have reached end of life is a red herring and I think you know it. Oil and gas reservoirs may run dry but the sun and wind don't have this problem. When equipment reaches EOL a renewable energy plant can be re-powered by replacing the EOL components, like solar panels or turbine blades. Furthermore the contracts between the landowner and the power company will have provisions for land reclamation should the landowner decide not to extend the contract. Of course you know that, but if you don't... it could easily be verified without a moratorium.

3. Renewable energy projects do consume agricultural land, but it is the landowner's decision to convert a portion of their property into an income generating business. That's their right. I also think you understand that even if renewable energy reached 30% of the generating capacity in Alberta, the land consumed would be a small fraction of the farmland in Alberta, less than 1%.

This is clearly an attempt to slow down a booming industry for the sole purpose of protecting oil and gas companies. As an Albertan that supports diversification of Alberta's energy industry, I can't believe the short-sightedness of this decision. It's damaging the Alberta economy and costing jobs. It's damaging Alberta's reputation as an entrepreneurial province where governments don't interfere with thriving businesses.

**The Alberta Utilities Commission regulates the utilities sector, natural gas and electricity markets to protect social, economic and environmental interests of Alberta where competitive market forces do not.**

The renewable energy moratorium will damage the economy. The environmental interests of Alberta are better served by renewable energy than fossil fuels. I hope you agree that global warming is caused by the burning fossil fuels and will continue to have worsening environmental impacts in our province. The social interests of Albertans are also tied to renewable energy. Every Albertan understands that our economy needs to diversify to smooth out the boom / bust cycle of the oil and gas industry. Renewable energy will lower the cost of electricity for Albertans and help relieve energy poverty. Electricity costs are lower during the day when renewable energy is supplying the grid. I think you know that too.

Please consider your mandate before making any further reckless decisions and don't be afraid to reverse this very bad choice you've made. We all understand where it's coming from and I'm pretty sure Albertans aren't going to put up with it.

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Alberta is the solar powerhouse of Canada, and we need to maintain our competitive edge. Pausing approvals during the inquiry period will cause unnecessary damage to Alberta's reputation. It will stifle billions of dollars in investment, threaten thousands of jobs for Albertans, lead to increased electricity costs for all ratepayers and slow efforts to address climate change.

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- As a member of the Alberta Liabilities Disclosure Project, I am acutely concerned with possible environmental liabilities, as has been the case with conventional and oil sands / mining projects in Alberta and elsewhere. Prompted by multiple negative reports of the Alberta Auditor General, Alberta Environment is currently working on an improved and more rigorous financial security program, and this could be applied to renewable energy projects. With respect to **end of life** concerns for renewable energy infrastructure disposal, the Alberta Recycling Management Authority (ARMA) is already piloting reuse and recycle programs for solar PV. Given that the majority of solar being installed today will be in operation for well over 25 years, ARMA is really out ahead on this matter.
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I am writing in response to your stakeholder feedback request dated August 3, 2023<sup>1</sup>, as a concerned Albertan resident. I believe the decision to pause approval of renewable projects of greater than 1MW<sup>2</sup> is unnecessary, will threaten thousands of jobs, will increase electricity costs for all ratepayers, will stifle billions of dollars in investment, and will slow



efforts to address climate change. Alberta is the solar powerhouse of Canada, and we need to maintain our competitive edge and further diversify our economy. If the Government of Alberta and AUC are unwilling to end the pause on approvals, which I believe it should, I believe that the AUC should continue processing applications for renewable energy projects in the meantime (pursue the third option in your announcement, "**Approval hold only**"). Partial or complete abeyance of new or existing applications will introduce uncertainty for those working and/or investing in the renewable energy sector while the inquiry is ongoing.

Below is my rationale, which seeks to address the concerns listed in the AUC chair's letter to Minister Neudorf on July 21, 2023<sup>3</sup>:

- With respect to land reclamation concerns, please note that solar sites will remain viable well past the end of life of the original panels, and this will significantly reduce land reclamation needs. Additionally, The Government of Alberta already has reclamation Guidelines for Renewable Energy Operations which address this matter.
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# AUC

Alberta Utilities Commission

reclamation needs. Additionally, The Government of Alberta already has reclamation [Guidelines for Renewable Energy Operations](#) which address this matter.

- With respect to **end of life** concerns for renewable energy infrastructure disposal, the Alberta Recycling Management Authority (ARMA) is already piloting reuse and recycle programs for solar PV. Given that the majority of solar being installed today will be in operation for well over 25 years, ARMA is really out ahead on this matter.
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If the Government of Alberta and the AUC are unwilling to immediately end the pause, I respectfully request that you continue to fully process new and existing excluded applications without issuing any approvals until after the pause period (Option 3 in your announcement).

Thank you for considering my request.

Sincerely,

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Dear AUC Members,

I am writing as a concerned Albertan resident in response to your stakeholder feedback request, dated August 3, 2023 (1). I respectfully request that the AUC end the pause and immediately recommence approvals for renewable energy projects greater than 1MW. I believe the decision to pause renewable projects of greater than 1MW (2) is unnecessary, will threaten thousands of jobs, will increase electricity costs for all ratepayers, will stifle billions of dollars in investment, and will slow efforts to address climate change. Alberta is the solar powerhouse of Canada, and we need to maintain our competitive edge.

I understand that you have a number of concerns you are seeking to address (3):

- With respect to land reclamation concerns, please note that solar sites will remain viable well past the end of life of the original panels, and this will significantly reduce land reclamation needs. Additionally, The Government of Alberta already has reclamation Guidelines for Renewable Energy Operations which address this matter.
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If the Government of Alberta and the AUC are unwilling to immediately end the pause, I respectfully request that you continue to fully process new and existing excluded applications without issuing any approvals until after the pause period (Option 3 in your announcement).

Thank you for considering my request.

Sincerely,

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Hello, my Wife and I are extremely supportive of the growing solar industry in Alberta. We need to remain at the leading edge of this technology which is rapidly changing energy systems world wide. We agree with the following feedback letter. Our home system is a 9.6kw ground mount solar array.

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Thank you for considering my request.

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Dear AUC Members,

I am writing as a concerned Albertan resident in response to your stakeholder feedback request, dated August 3, 2023<sup>1</sup>. **I respectfully request that the AUC end the pause and immediately**



**recommence approvals for renewable energy projects greater than 1MW.** I believe the decision to pause renewable projects of greater than 1MW<sup>2</sup> is unnecessary, will threaten thousands of jobs, will increase electricity costs for all ratepayers, will stifle billions of dollars in investment, and will slow efforts to address climate change. Alberta is the solar powerhouse of Canada, and we need to maintain our competitive edge.

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Thank you for considering my request.

Sincerely,

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Dear People at The Alberta Utilities Commission

On behalf of all the trees burning up, people dying from heatwaves and catastrophic flooding, I am requesting that you end the pause on approvals for renewable energy projects please.

As you probably know many are questioning the ethics of pausing approvals at this time.

thank you

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DEAR AUC MEMBERS,

I am writing as a concerned Albertan resident in response to your stakeholder feedback request, dated August 3, 2023<sup>1</sup>. **I respectfully request that the AUC end the pause and immediately recommence approvals for renewable energy projects greater than 1MW.** I believe the decision to pause renewable projects of greater than 1MW<sup>2</sup> is unnecessary, will threaten thousands of jobs, will increase electricity costs for all ratepayers, will stifle billions of dollars in investment, and will slow efforts to address climate change. Alberta is the solar powerhouse of Canada, and we need to maintain our competitive edge.

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Thank you for considering my request.

Sincerely,

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Dear AUC Members,

I'm a huge supporter of renewables in Alberta, and I have a 5.56kwh solar system on my home in Calgary! I've also talked my friends into putting solar on their homes and we are all loving our systems. I am writing as a concerned Albertan resident in response to your stakeholder feedback request, dated August 3, 2023<sup>1</sup>.

**I respectfully request that the AUC end the pause and immediately recommence approvals for renewable energy projects greater than 1MW.** I believe the decision to pause renewable projects of greater than 1MW<sup>2</sup> is unnecessary, will threaten thousands of jobs, will increase electricity costs for all ratepayers, will stifle billions of dollars in investment, and will slow efforts to address climate change. Alberta is the solar powerhouse of Canada, and we need to maintain our competitive edge.

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If the Government of Alberta and the AUC are unwilling to immediately end the pause, I respectfully request that you continue to fully process new and existing excluded applications without issuing any approvals until after the pause period (Option 3 in your announcement).

Thank you for considering my request.

Sincerely,

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I understand that you have several concerns you are seeking to address:

With respect to land reclamation concerns, please note that solar sites will remain viable well past the end of life of the original panels, and this will significantly reduce land reclamation needs.

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If the Government of Alberta and the AUC are unwilling to immediately end the ban on green energy, I respectfully request that you continue to fully process new and existing applications so they can be approved as soon as possible once approvals recommence.



Thank you for considering my request.

Sincerely,

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Dear AUC Members,

I am writing as a concerned Albertan resident in response to your stakeholder feedback request, dated August 3, 2023. I respectfully request that the AUC end the pause and immediately recommence approvals for renewable energy projects greater than 1 MW. Please consider the attached letter.

Best regards,

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Dear AUC Members,

I am writing as a concerned Albertan resident in response to your stakeholder feedback request, dated August 3, 2023. **I respectfully request that the AUC end the pause and immediately recommence approvals for renewable energy projects greater than 1MW.** I believe the decision to pause renewable projects of greater than 1MW is unnecessary, will threaten thousands of jobs, will increase electricity costs for all ratepayers, will stifle billions of dollars in investment, and will slow efforts to address climate change. Alberta is the solar powerhouse of Canada, and we need to maintain our competitive edge.

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Thank you for considering my request.

Sincerely,

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Dear AUC Members,

I am writing as a concerned Albertan resident and worker in the Alberta renewable industry in response to your stakeholder feedback request, dated August 3, 2023<sup>1</sup>. **I respectfully request that the AUC end the pause and immediately recommence approvals for renewable energy projects greater than 1MW.** I believe the decision to pause renewable projects of greater than 1MW<sup>2</sup> is unnecessary, will threaten thousands of jobs, will increase electricity costs for all ratepayers, will stifle billions of dollars in investment, and will slow efforts to address climate change. Alberta is the solar powerhouse of Canada, and we need to maintain our competitive edge.

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Regards,

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- With respect to **end of life** concerns for renewable energy infrastructure disposal, the Alberta Recycling Management Authority (ARMA) is already piloting reuse and recycle



# AUC

Alberta Utilities Commission

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Thank you for considering my request.

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Thank you for considering my request, I hope you will look out for the best interests of Albertans and not just the oligarchy of oil companies.

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Dear AUC Members,

I am writing as someone who has just moved to Alberta from Vancouver and was initially excited at the province's potential for renewable energy development. I think it could serve as a promising way for Alberta to slowly shift away from depending so much on oil and gas for its economic wellbeing, and the renewable energy sector presents an opportunity for economic growth and more jobs for Albertans. So you can imagine I was disappointed to hear about Premier Smith's pause on renewable energy projects.



In response to your stakeholder feedback request, dated August 3, 2023, I respectfully request that the AUC end the pause and immediately recommence approvals for renewable energy projects greater than 1MW. I believe the decision to pause renewable projects of greater than 1MW<sup>2</sup> is unnecessary, will threaten thousands of jobs, will increase electricity costs for all Albertans, will stifle billions of dollars in investment, and will slow efforts to address climate change. Alberta is the renewable energy powerhouse of Canada and it would be foolish not to make use of its natural advantages. Please, don't let Alberta miss out on this opportunity to be a world leader in this field!

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I am disappointed that all the options were for some amount of pause because it really isn't needed. However, if the Government of Alberta and the AUC are unwilling to immediately end the pause, I respectfully request that you continue to fully process new and existing excluded



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Dear Alberta Utilities Commission (AUC),

I am writing to provide my input and perspective on the recent announcement by you, the Alberta Utilities Commission (AUC) regarding the temporary PAUSE on approvals for new renewable electricity generation projects. As a concerned stakeholder deeply invested in the future of our province's energy landscape and sustainability, I believe it is crucial to share my thoughts on this matter.

I commend the AUC for taking the initiative to seek feedback from stakeholders like myself regarding the implementation of the approval pause. It is clear that decisions of this magnitude have far-reaching implications, and engaging stakeholders in the process is a commendable approach.

After careful consideration of the options presented, **I am in favor of Option 1**, which involves a comprehensive review of the entire process. My rationale for supporting this option is rooted in the belief that the current approach necessitates a thorough re-evaluation. Several factors contribute to this viewpoint.

The concerns I have pertain to various aspects of the renewable energy approval process. These concerns range from the practice of signing lease options before adequate public consultation, to the limitations placed on community input concerning AEPA environmental referral reports, and the stringent legal expert requirements imposed by the AUC. This combination of factors creates barriers that hinder meaningful public participation in a cost-effective manner. Consequently, I firmly believe that a comprehensive review, conducted through a transparent and inclusive public inquiry, is essential to comprehensively address these issues.

Given the intricate nature of these challenges, I am apprehensive about the potential efficacy of continuing with the approval review process as outlined in Options 2 and 3. If the AUC were to proceed with accepting applications and conduct partial processes under the existing guidelines, it could signal a reluctance to make substantive changes. However, if substantial modifications are eventually introduced, re-evaluating all submitted applications would likely prove to be an inefficient allocation of time and resources for both applicants and the AUC.

Considering the aforementioned challenges and potential pitfalls, I firmly believe that the decision to pause the approval process is a prudent one. This temporary



pause not only acknowledges the need for reform but also offers an opportunity for a comprehensive review that ensures all facets of the process are meticulously examined and improved upon.

In conclusion, **I stand in support of Option 1** due to the imperative need for a comprehensive review that effectively addresses the current shortcomings in the renewable energy approval process. The overarching objective should be the establishment of a transparent, participatory, and streamlined process that fosters meaningful stakeholder input and facilitates responsible renewable energy development within our province.

I extend my gratitude to you for considering my feedback on this pivotal matter. I applaud the AUC's commitment to cultivating a more sustainable energy future for Alberta, and I eagerly anticipate the positive transformations that will emerge as a result of this thorough review.

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Dear Alberta Utilities Commission (AUC),

I am writing to provide my input and perspective on the recent announcement by you, the Alberta Utilities Commission (AUC) regarding the temporary PAUSE on



approvals for new renewable electricity generation projects. As a concerned stakeholder deeply invested in the future of our province's energy landscape and sustainability, I believe it is crucial to share my thoughts on this matter.

I commend the AUC for taking the initiative to seek feedback from stakeholders like myself regarding the implementation of the approval pause. It is clear that decisions of this magnitude have far-reaching implications, and engaging stakeholders in the process is a commendable approach.

After careful consideration of the options presented, **I am in favor of Option 1**, which involves a comprehensive review of the entire process. My rationale for supporting this option is rooted in the belief that the current approach necessitates a thorough re-evaluation. Several factors contribute to this viewpoint.

The concerns I have pertain to various aspects of the renewable energy approval process. These concerns range from the practice of signing lease options before adequate public consultation, to the limitations placed on community input concerning AEPA environmental referral reports, and the stringent legal expert requirements imposed by the AUC. This combination of factors creates barriers that hinder meaningful public participation in a cost-effective manner. Consequently, I firmly believe that a comprehensive review, conducted through a transparent and inclusive public inquiry, is essential to comprehensively address these issues.

Given the intricate nature of these challenges, I am apprehensive about the potential efficacy of continuing with the approval review process as outlined in Options 2 and 3. If the AUC were to proceed with accepting applications and conduct partial processes under the existing guidelines, it could signal a reluctance to make substantive changes. However, if substantial modifications are eventually introduced, re-evaluating all submitted applications would likely prove to be an inefficient allocation of time and resources for both applicants and the AUC.

Considering the aforementioned challenges and potential pitfalls, I firmly believe that the decision to pause the approval process is a prudent one. This temporary pause not only acknowledges the need for reform but also offers an opportunity





for a comprehensive review that ensures all facets of the process are meticulously examined and improved upon.

In conclusion, **I stand in support of Option 1** due to the imperative need for a comprehensive review that effectively addresses the current shortcomings in the renewable energy approval process. The overarching objective should be the establishment of a transparent, participatory, and streamlined process that fosters meaningful stakeholder input and facilitates responsible renewable energy development within our province.

I extend my gratitude to you for considering my feedback on this pivotal matter. I applaud the AUC's commitment to cultivating a more sustainable energy future for Alberta, and I eagerly anticipate the positive transformations that will emerge as a result of this thorough review.

Thank you for your time and attention.

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Maurice Lemay

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Dear AUC Members,

I am writing as a concerned Albertan resident in response to your stakeholder feedback request, dated August 3, 2023. I respectfully request that the AUC end the pause and immediately recommence approvals for renewable energy projects greater than 1MW. I believe the decision to pause renewable projects of greater than 1MW is unnecessary, will threaten thousands of jobs, will increase electricity costs for all ratepayers, will stifle billions of dollars in investment, and will slow efforts to address climate change. Alberta is the solar powerhouse of Canada, and we need to maintain our competitive edge.

I understand that you have a number of concerns you are seeking to address:

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With respect to end of life concerns for renewable energy infrastructure disposal, the Alberta Recycling Management Authority (ARMA) is already piloting reuse and recycle programs for solar PV. Given that the majority of solar being installed today will be in operation for well over 25 years, ARMA is really out ahead on this matter.

With respect to land use concerns, such as food security, wetland preservation and wildlife conservation, Solar Alberta has already created highly relevant Solar Siting Recommendations:



<https://solaralberta.ca/solar-siting-recommendations/>. I believe you could review and adopt protocols such as these without a pause on approvals.

If the Government of Alberta and the AUC are unwilling to immediately end the pause, I respectfully request that you continue to fully process new and existing excluded applications without issuing any approvals until after the pause period (Option 3 in your announcement).

PS; I personally work in the Wind Energy Sector on the maintenance side. If there are any questions for someone with boots on the ground, do not hesitate to ask.

Thank you for considering my request.

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## END THE PAUSE ON RENEWABLES APPROVALS IN ALBERTA NOW

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Alberta Utilities Commission

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The Town of Innisfail has several concerns related to the enacted pause on AUC approvals for renewables projects over 1 MW. The Town is currently preparing an AUC application for an approximately 2 MW ground mount solar system to be constructed on a brownfield site within the Town's Industrial area. This project is intended to utilize lands that are not suitable for any sort of industrial development and will serve as a stable, non-tax revenue source for our community. To date the Town has invested over \$100,000 in plans and studies to fulfill the approval process. The project was intended to begin construction in mid-2024.

It is the opinion of the Town that projects of this nature should not be subject to the pause due to the location (brownfield, non-agricultural or environmental lands within an urban environment) and scale of the project (6 acres). Projects of this scale are not impacting the supply mix of the grid and this project will remain on publicly owned, municipal lands for the lifespan of the project. The Town is requesting a review of the project parameters subject to the pause to consider smaller projects on non-agricultural lands for exemption.

In addition, the AUC should only be placing approvals on hold as opposed to a full or partial abeyance during the pause period to avoid a backlog of processing once the period has expired.

Thank you for the opportunity to provide input on this issue.

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# AUC

Alberta Utilities Commission

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Dear Minister Neudorf & AUC Members,

I am writing to you as a concerned Albertan resident and business owner in response to your stakeholder feedback request dated August 3, 2023[1]. I respectfully request that the AUC end the pause and immediately recommence approvals for renewable energy projects greater than 1MW. I



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# AUC

Alberta Utilities Commission

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*Alberta is supposedly a land with a frontier spirit and a leader in both discovery and innovation. A province that espouses a belief in competition, free market and small government. I'm not requesting that you give any advantage to any type of energy generation or express support for any other political agenda. Just get out of the way and allow fair innovation and competition in our energy spaces to help grow job opportunities and improve the standard of living for all Albertans.*

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Alberta Utilities Commission

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August 15, 2023

To the Alberta Utilities Commission:

Atlas Power Technologies is a Canadian company with manufacturing facilities located in Abbotsford British Columbia and Nisku Alberta. Our company has developed a state-of-the-art supercapacitor technology (a type of energy storage device) with industry-leading safety, cycle life, power, and energy density.

Supercapacitors carry specific power advantages over alternative energy storage technologies. They are a type of high-power short duration energy storage device, the highpower aspect is a result of the charge and discharge physics of this type of device. As we move forward into an era of renewable



electricity generation a wide range of technologies will be needed, supercapacitors are one of many important technologies that will have to play a part.

Our company has a world-class engineering team that has been designing a utility-scale energy storage system, specifically tailored to address the need to provide primary frequency response in electrical grids, a critical need in Alberta currently. Our solution for primary frequency response is used to address the steadily declining response capability within electrical grids that we have seen over the last 15 years due to the increasing penetration of renewables, which is particularly pronounced in Alberta.

Frequency response equipment is the front-line response technology when something in our electrical grid fails, such as a generator going offline or an intertie tipping. This class of reliability technology is critically important to keep the light and heat on when something in the electrical grid fails.

Our company, developed from Canadian innovation, with technology being manufactured here in Canada, would like to make sure that though the Alberta AUC has paused the development of renewable projects for the next 6-months, they still allow technologies that add this FFR and PRF capability to continuously be added to the Alberta electrical grid as it is so urgently needed.

The Alberta Electric System Operator (AESO) also feels frequency response is absolutely critical and urgently needed in Alberta's electrical supply in order to create a reliable and low-cost electrical grid. This was indicated in their recently developed "Reliability Roadmap" market guidance document. This lack of FFR and PFR has directly caused the derating of the BC-Alberta intertie, which has subsequently caused the price of power in Alberta to triple over the last 3 years, and now sits as the highest price of electricity in North America.

Currently, the AUC has included hydro-facilities and major modifications to hydro-facilities as part of the renewables classified to undergo a pause for six months. Atlas has been working with a major independent power producer in Alberta for nearly the last 2 years designing a hybrid hydro-supercapacitor system that will provide the urgently needed fast frequency response to the Alberta Electrical grid. Alberta has nearly 1 gigawatt worth of hydroelectric generation operating today. Utilizing Atlas' supercapacitor system our



partnership consortium is working to quickly implement a product that would allow for a rapid response under 250 milliseconds, that can sustain output for hours due to the hydro reservoirs.

**We are formally requesting modifications to hydro-facilities be removed from the AUC's 6-month pause on renewables to allow technologies such as ours the ability to enter the market and help support the Alberta Electrical Grid.**

It is a technology like ours that is used to keep the lights on, our families safe and warm, and the economy moving forward when the grid needs it the most.

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If the Government of Alberta and the AUC are unwilling to immediately end the pause, I respectfully request that you continue to fully process new and existing excluded applications without issuing any approvals until after the pause period (Option 3 in your announcement).

Thank you for considering my request.

Sincerely,

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Dear AUC Members,

Below is a form letter that I 100% agree with, and would like to add on the start that the leaps forwards in renewable projects we've had and will have if this "pause" is undone would be an amazing tool to fight Alberta's energy prices as well as our very much less than green reputation around the world and I can't imagine a realistic reason this was done other than to further subsidize pro UPC Coal and Natural Gas. Industries which will continue to have great opportunities outside of energy generation as well as alongside renewable energy.



I am writing as a concerned Albertan resident in response to your stakeholder feedback request, dated August 3, 2023<sup>1</sup>. **I respectfully request that the AUC end the pause and immediately recommence approvals for renewable energy projects greater than 1MW.** I believe the decision to pause renewable projects of greater than 1MW<sup>2</sup> is unnecessary, will threaten thousands of jobs, will increase electricity costs for all ratepayers, will stifle billions of dollars in investment, and will slow efforts to address climate change. Alberta is the solar powerhouse of Canada, and we need to maintain our competitive edge.

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Dear Alberta Utilities Commission (AUC),

I am writing to provide my input and perspective on the recent announcement by you, the Alberta Utilities Commission (AUC) regarding the temporary PAUSE on approvals for new renewable electricity generation projects. As a concerned stakeholder deeply invested in the future of our province's energy landscape and sustainability, I believe it is crucial to share my thoughts on this matter.





I commend the AUC for taking the initiative to seek feedback from stakeholders like myself regarding the implementation of the approval pause. It is clear that decisions of this magnitude have far-reaching implications, and engaging stakeholders in the process is a commendable approach.

After careful consideration of the options presented, **I am in favor of Option 1**, which involves a comprehensive review of the entire process. My rationale for supporting this option is rooted in the belief that the current approach necessitates a thorough re-evaluation. Several factors contribute to this viewpoint.

The concerns I have pertain to various aspects of the renewable energy approval process. These concerns range from the practice of signing lease options before adequate public consultation, to the limitations placed on community input concerning AEPA environmental referral reports, and the stringent legal expert requirements imposed by the AUC. This combination of factors creates barriers that hinder meaningful public participation in a cost-effective manner. Consequently, I firmly believe that a comprehensive review, conducted through a transparent and inclusive public inquiry, is essential to comprehensively address these issues.

Given the intricate nature of these challenges, I am apprehensive about the potential efficacy of continuing with the approval review process as outlined in Options 2 and 3. If the AUC were to proceed with accepting applications and conduct partial processes under the existing guidelines, it could signal a reluctance to make substantive changes. However, if substantial modifications are eventually introduced, re-evaluating all submitted applications would likely prove to be an inefficient allocation of time and resources for both applicants and the AUC.

Considering the aforementioned challenges and potential pitfalls, I firmly believe that the decision to pause the approval process is a prudent one. This temporary pause not only acknowledges the need for reform but also offers an opportunity for a comprehensive review that ensures all facets of the process are meticulously examined and improved upon.



In conclusion, I **stand in support of Option 1** due to the imperative need for a comprehensive review that effectively addresses the current shortcomings in the renewable energy approval process. The overarching objective should be the establishment of a transparent, participatory, and streamlined process that fosters meaningful stakeholder input and facilitates responsible renewable energy development within our province.

I extend my gratitude to you for considering my feedback on this pivotal matter. I applaud the AUC's commitment to cultivating a more sustainable energy future for Alberta, and I eagerly anticipate the positive transformations that will emerge as a result of this thorough review.

Thank you for your time and attention.

Sincerely,

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Dear Alberta Utilities Commission,

I am writing to provide my input and perspective on the recent announcement by the Alberta Utilities Commission regarding the temporary pause on approvals for new renewable electricity generation projects. As a concerned stakeholder, I believe it is crucial to share my thoughts on this matter.

Firstly, I appreciate the AUC's initiative in seeking feedback from stakeholders regarding the implementation of the approval pause. It is evident that decisions of this nature have significant implications for our province's energy landscape and future sustainability.

In response to the options presented, I am in favor of **Option 1**, which involves a comprehensive review of the entire process. My rationale for supporting this option is rooted in the belief that the current approach necessitates a thorough re-evaluation. Several factors contribute to this viewpoint.



The concerns I have pertain to the entire renewable energy approval process, ranging from the signing of lease options prior to public consultation, to the limited input provided by communities on AEPA environmental referral reports, and the rigid legal expert requirements stipulated by the AUC. This combination of factors makes it challenging for the public to meaningfully participate in a cost-effective manner. Consequently, I believe that a comprehensive review, conducted through a public inquiry, is necessary to address these issues comprehensively.

Given the complexities and intricacies involved, I am apprehensive about the efficacy of continuing with the approval review process as outlined in Options 2 and 3. If the AUC proceeds with accepting applications and executes partial processes under the existing guidelines, it could imply that substantive changes are unlikely. However, if substantial modifications are eventually introduced, re-evaluating all submitted applications would be an inefficient utilization of time and resources for both applicants and the AUC.

In light of the aforementioned challenges and potential setbacks, I believe that the decision to pause the approval process is prudent. This temporary pause not only acknowledges the need for reform but also allows for a comprehensive review that ensures all aspects of the process are thoroughly examined and improved upon.

In conclusion, I support **Option 1** due to the necessity of a comprehensive review that addresses the current shortcomings in the renewable energy approval process. The ultimate goal should be to establish a more transparent, participatory, and efficient process that encourages meaningful stakeholder input and promotes responsible renewable energy development in our province.

Thank you for considering my feedback on this critical matter. I appreciate the AUC's dedication to fostering a more sustainable energy future for Alberta, and I look forward to witnessing the positive changes that will arise from this review.

Sincerely,

Dear AUC Members,

I am writing as a concerned Albertan resident in response to your stakeholder feedback request, dated August 3, 2023<sup>1</sup>. **I respectfully request that the AUC end the pause and immediately recommence approvals for renewable energy projects greater than 1MW.** I believe the decision to pause renewable projects of greater than 1MW<sup>2</sup> is unnecessary, will threaten thousands of jobs, will increase electricity costs for all ratepayers, will stifle billions of dollars in investment, and will slow efforts to address climate change. Alberta is the solar powerhouse of Canada, and we need to maintain our competitive edge.

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I commend the AUC for taking the initiative to seek feedback from stakeholders like myself regarding the implementation of the approval

pause. It is clear that decisions of this magnitude have far-reaching implications, and engaging stakeholders in the process is a commendable approach.

After careful consideration of the options presented, **I am in favor of Option 1**, which involves a comprehensive review of the entire process. My rationale for supporting this option is rooted in the belief that the current approach necessitates a thorough re-evaluation. Several factors contribute to this viewpoint.

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# AUC

Alberta Utilities Commission

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I am writing as a concerned Albertan resident in response to your stakeholder feedback request, dated August 3 , 2023. I respectfully request that the AUC end the pause and immediately recommence approvals for renewable energy projects greater than 1MW. I believe the decision to pause renewable projects of greater than 1MW2 is unnecessary, will threaten thousands of jobs, will increase electricity costs for all ratepayers, will stifle billions of dollars in investment, and will slow efforts to address climate change. Alberta is the solar powerhouse of Canada, and we need to maintain our competitive edge.

I understand that you have a number of concerns you are seeking to address:

- With respect to land reclamation concerns, please note that solar sites will remain viable well past the end of life of the original panels, and this will significantly reduce land reclamation needs. Additionally, The Government of Alberta already has reclamation Guidelines for Renewable Energy Operations which address this matter.

-With respect to end of life concerns for renewable energy infrastructure disposal, the Alberta Recycling Management Authority (ARMA) is already piloting reuse and recycle programs for solar PV. Given that the majority of solar being installed today will be in operation for well over 25 years, ARMA is really out ahead on this matter.

- With respect to land use concerns, such as food security, wetland preservation and wildlife conservation, Solar Alberta has already created highly relevant Solar Siting Recommendations: <https://solaralberta.ca/solar-siting-recommendations/>. I believe you could review and adopt protocols such as these without a pause on approvals.

- If the Government of Alberta and the AUC are unwilling to immediately end the pause, I respectfully request that you continue to fully process new and existing excluded applications without issuing any approvals until after the pause period (Option 3 in your announcement).

Thank you for considering my request.





Also, we have been having some of the worst climate disasters we've ever seen. Our province caught fire, Maui has people dying, tornados are becoming common here, climate refugees will become a thing very soon.

Denying access to an energy sector that could help alleviate some of the climate emergency we are facing is so counterintuitive it feels idiotic.

While I understand that oil lobbyists are concerned at the growth of our renewable sector, a government shouldn't stop one industry to protect the profits of another.

Sincerely,

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Dear Alberta Utilities Commission (AUC),

I am writing to provide my input and perspective on the recent announcement by you, the Alberta Utilities Commission (AUC) regarding the temporary PAUSE on approvals for new renewable electricity generation projects. As a concerned stakeholder deeply invested in the future of our province's energy landscape and sustainability, I believe it is crucial to share my thoughts on this matter.

I commend the AUC for taking the initiative to seek feedback from stakeholders like myself regarding the implementation of the approval pause. It is clear that decisions of this magnitude have far-reaching implications, and engaging stakeholders in the process is a commendable approach.

After careful consideration of the options presented, **I am in favor of Option 1**, which involves a comprehensive review of the entire process. My rationale for supporting this option is rooted in the belief that the current approach necessitates a thorough re-evaluation. Several factors contribute to this viewpoint.

The concerns I have pertain to various aspects of the renewable energy approval process. These concerns range from the practice of signing lease options before adequate public consultation, to the limitations placed on community input concerning AEPA environmental referral reports, and the stringent legal expert requirements imposed by the AUC. This combination of factors creates barriers that hinder meaningful public participation in a cost-effective manner.

Consequently, I firmly believe that a comprehensive review, conducted through a



transparent and inclusive public inquiry, is essential to comprehensively address these issues.

Given the intricate nature of these challenges, I am apprehensive about the potential efficacy of continuing with the approval review process as outlined in Options 2 and 3. If the AUC were to proceed with accepting applications and conduct partial processes under the existing guidelines, it could signal a reluctance to make substantive changes. However, if substantial modifications are eventually introduced, re-evaluating all submitted applications would likely prove to be an inefficient allocation of time and resources for both applicants and the AUC.

Considering the aforementioned challenges and potential pitfalls, I firmly believe that the decision to pause the approval process is a prudent one. This temporary pause not only acknowledges the need for reform but also offers an opportunity for a comprehensive review that ensures all facets of the process are meticulously examined and improved upon.

In conclusion, **I stand in support of Option 1** due to the imperative need for a comprehensive review that effectively addresses the current shortcomings in the renewable energy approval process. The overarching objective should be the establishment of a transparent, participatory, and streamlined process that fosters meaningful stakeholder input and facilitates responsible renewable energy development within our province.

I extend my gratitude to you for considering my feedback on this pivotal matter. I applaud the AUC's commitment to cultivating a more sustainable energy future for Alberta, and I eagerly anticipate the positive transformations that will emerge as a result of this thorough review.

Thank you for your time and attention.

Sincerely,

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Dear AUC Members,

I am writing as a concerned Albertan resident in response to your stakeholder feedback request, dated



August 3, 2023. I respectfully request that the AUC end the pause and immediately recommence approvals for renewable energy projects greater than 1MW. I believe the decision to pause renewable projects of greater than 1MW is unnecessary, will threaten thousands of jobs, will increase electricity costs for all ratepayers, will stifle billions of dollars in investment, and will slow efforts to address climate change. Alberta is the solar powerhouse of Canada, and we need to maintain our competitive edge.

I understand that you have a number of concerns you are seeking to address.

With respect to land reclamation concerns, please note that solar sites will remain viable well past the end of life of the original panels, and this will significantly reduce land reclamation needs. Additionally, The Government of Alberta already has reclamation Guidelines for Renewable Energy Operations which address this matter.

With respect to end of life concerns for renewable energy infrastructure disposal, the Alberta Recycling Management Authority (ARMA) is already piloting reuse and recycle programs for solar PV. Given that the majority of solar being installed today will be in operation for well over 25 years, ARMA is really out ahead on this matter.

With respect to land use concerns, such as food security, wetland preservation and wildlife conservation, Solar Alberta has already created highly relevant Solar Siting Recommendations: <https://solaralberta.ca/solar-siting-recommendations/>. I believe you could review and adopt protocols such as these without a pause on approvals.

If the Government of Alberta and the AUC are unwilling to immediately end the pause, I respectfully request that you continue to fully process new and existing excluded applications without issuing any approvals until after the pause period (Option 3 in your announcement).

Thank you for considering my request.

Sincerely,

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Dear AUC Members:

I am writing as a concerned Albertan resident and as an involved Member and Director of a renewable energy co-operative in response to your stakeholder feedback request, dated August 3, 2023(1). **I respectfully request that the AUC end the pause and immediately recommence processing applications for renewable energy projects greater than 1 MW.** I believe the decision to pause renewable projects of greater than 1 MW(2) is unnecessary, will threaten thousands of jobs, will increase electricity costs for all ratepayers, will stifle billions of dollars in investment, and will slow efforts to address climate change. Alberta is the solar powerhouse of Canada, and we need to maintain our competitive edge.

I understand that you have a number of concerns you are seeking to address(3):



- With respect to land reclamation concerns, please note that solar sites will remain viable well past the end of life of the original panels, and this will significantly reduce land reclamation needs. Additionally, The Government of Alberta already has reclamation Guidelines for Renewable Energy Operations which address this matter.
- With respect to end of life concerns for renewable energy infrastructure disposal, the Alberta Recycling Management Authority (ARMA) is already piloting reuse and recycle programs for solar PV. Given that the majority of solar being installed today will be in operation for well over 25 years, ARMA is really ahead on this matter.
- With respect to land use concerns, such as food security, wetland preservation and wildlife conservation, Solar Alberta has already created highly relevant Solar Siting Recommendations: <https://solaralberta.ca/solar-siting-recommendations/>. I believe you could review and adopt protocols such as these without a pause on approvals.

If the Government of Alberta and the AUC are unwilling to immediately end the pause, I respectfully request that you continue to fully process new and existing excluded applications without issuing any approvals until after the pause period (Option 3 in your announcement). Alternately, **at least allow applications for less than 5 MW to proceed, exempt from the pause.**

Thank you for considering my request.

Sincerely,

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Dear AUC Members,

I am writing as a concerned Albertan resident in response to your stakeholder feedback request, dated August 3, 2023. I respectfully request that the AUC end the pause and immediately recommence approvals for renewable energy projects greater than 1MW. I believe the decision to pause renewable projects of greater than 1MW is unnecessary, will threaten thousands of jobs, will increase electricity costs for all ratepayers, will stifle billions of dollars in investment, and will slow efforts to address climate change. Alberta is the solar powerhouse of Canada, and we need to maintain our competitive edge.

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With respect to land reclamation concerns, please note that solar sites will remain viable well past the end of life of the original panels, and this will significantly reduce land reclamation needs. Additionally, The Government of Alberta already has reclamation Guidelines for Renewable Energy Operations which address this matter.

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the majority of solar being installed today will be in operation for well over 25 years, ARMA is really out ahead on this matter.

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If the Government of Alberta and the AUC are unwilling to immediately end the pause, I respectfully request that you continue to fully process new and existing excluded applications without issuing any approvals until after the pause period (Option 3 in your announcement).

Thank you for considering my request.

Sincerely,

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Dear AUC Members,

I am writing as a concerned Albertan resident in response to your stakeholder feedback request, dated August 3, 2023. I respectfully request that the AUC end the pause and immediately recommence approvals for renewable energy projects greater than 1MW. I believe the decision to pause renewable projects of greater than 1MW is unnecessary, will threaten thousands of jobs, will increase electricity costs for all ratepayers, will stifle billions of dollars in investment, and will slow efforts to address climate change. Alberta is the solar powerhouse of Canada, and we need to maintain our competitive edge.

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If the Government of Alberta and the AUC are unwilling to immediately end the pause, I respectfully request that you continue to fully process new and existing excluded applications without issuing any approvals until after the pause period (Option 3 in your announcement).

Thank you for considering my request.

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Thank you for considering my request.

Sincerely,

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Dear AUC Members,

I am writing as a concerned Alberta resident, environmental scientist, parent, and concerned community member in response to your stakeholder feedback request, dated August 3, 2023<sup>1</sup>. **I respectfully request that the AUC end the pause and immediately recommence approvals for renewable energy projects greater than 1MW.** I believe the decision to pause renewable projects of greater than 1MW<sup>2</sup> is unnecessary, will threaten thousands of jobs, will increase electricity costs for all ratepayers, will stifle billions of dollars in investment, and will significantly slow efforts to address climate change. Alberta is a solar and wind powerhouse of Canada, and we need to maintain our competitive edge.

I understand that you have a number of concerns you are seeking to address<sup>3</sup>:

- With respect to **land reclamation** concerns, please note that solar sites will remain viable well past the end of life of the original panels, and this will significantly reduce land reclamation needs. Additionally, The Government of Alberta already has reclamation [Guidelines for Renewable Energy Operations](#) ( [Guidelines for Renewable Energy Operations | Alberta.ca](#)) which address this matter.
- With respect to **end of life** concerns for renewable energy infrastructure disposal, the Alberta Recycling Management Authority (ARMA) is already piloting reuse and recycle programs for solar PV. Given that the majority of solar being installed today will be in operation for well over 25 years, ARMA is really out ahead on this matter.
- With respect to **land use** concerns, such as food security, wetland preservation and wildlife conservation, Solar Alberta has already created highly relevant Solar Siting Recommendations: <https://solaralberta.ca/solar-siting-recommendations/>. I believe you could review and adopt protocols such as these without a pause on approvals.
- With Alberta and many other areas of the world seeing massive wildfires, extreme heat, and other severe weather this summer and in previous years, it is clear that the severe effects of climate change are here and are getting worse with each passing year. Many of the negative impacts of climate change (such as increased emissions from wildfires and increased drought) further drive climate change. This is no time to put a pause on supporting renewables. The Government of Alberta must stop treating renewables and climate change as a partisan issue, and the AUC and AESO must implement a fair regulatory framework that ensures Alberta continues to be a leader in renewables.

If the Government of Alberta and the AUC are unwilling to immediately end the pause, I respectfully request that you continue to fully process new and existing excluded applications without issuing any approvals until after the pause period (Option 3 in your announcement).

My family also installed a solar PV system at our residence in Calgary this year, as well as other energy upgrades such as improved wall insulation and windows. I believe the Government of Alberta, AUC, and AESO should better incentivize both homeowners and businesses to install solar. In Calgary, for example, there is a huge potential for PV array installs on flat roofs of industrial, commercial, and institutional properties, but next to no installations other than a growing number of residential micro-generation installations. Other than the Greener Homes Grant provided by the Government of Canada, there are no incentives/grants provided in Calgary, except for the incentive the sun provides with all the hours of good quality light.

Thank you for considering my request.

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Dear AUC Members,

I am writing as a concerned Albertan resident in response to your stakeholder feedback request, dated August 3, 2023. I respectfully request that the AUC end the pause and immediately recommence



approvals for renewable energy projects greater than 1MW. I believe the decision to pause renewable projects of greater than 1MW<sup>2</sup> is unnecessary, will threaten thousands of jobs, will increase electricity costs for all ratepayers, will stifle billions of dollars in investment, and will slow efforts to address climate change. Alberta is the solar powerhouse of Canada, and we need to maintain our competitive edge.

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Thank you for considering my request.

Sincerely,

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Dear Alberta Utilities Commission (AUC),

I am writing to provide my input and perspective on the recent announcement by you, the Alberta Utilities Commission (AUC) regarding the temporary PAUSE on approvals for new renewable electricity generation projects. As a concerned stakeholder deeply invested in the future of our province's energy landscape and sustainability, I believe it is crucial to share my thoughts on this matter.

I commend the AUC for taking the initiative to seek feedback from stakeholders like myself regarding the implementation of the approval pause. It is clear that decisions of this magnitude have far-reaching implications, and engaging stakeholders in the process is a commendable approach.

After careful consideration of the options presented, **I am in favor of Option 1**, which involves a comprehensive review of the entire process. My rationale for supporting this option is rooted in the belief that the current approach necessitates a thorough re-evaluation. Several factors contribute to this viewpoint.

The concerns I have pertain to various aspects of the renewable energy approval process. These concerns range from the practice of signing lease options before adequate public consultation, to the limitations placed on community input concerning AEPA environmental referral reports, and the stringent legal expert requirements imposed by the AUC. This combination of factors creates barriers that hinder meaningful public participation in a cost-effective manner.

Consequently, I firmly believe that a comprehensive review, conducted through a transparent and inclusive public inquiry, is essential to comprehensively address these issues.

Given the intricate nature of these challenges, I am apprehensive about the potential efficacy of continuing with the approval review process as outlined in



Options 2 and 3. If the AUC were to proceed with accepting applications and conduct partial processes under the existing guidelines, it could signal a reluctance to make substantive changes. However, if substantial modifications are eventually introduced, re-evaluating all submitted applications would likely prove to be an inefficient allocation of time and resources for both applicants and the AUC.

Considering the aforementioned challenges and potential pitfalls, I firmly believe that the decision to pause the approval process is a prudent one. This temporary pause not only acknowledges the need for reform but also offers an opportunity for a comprehensive review that ensures all facets of the process are meticulously examined and improved upon.

In conclusion, **I stand in support of Option 1** due to the imperative need for a comprehensive review that effectively addresses the current shortcomings in the renewable energy approval process. The overarching objective should be the establishment of a transparent, participatory, and streamlined process that fosters meaningful stakeholder input and facilitates responsible renewable energy development within our province.

I extend my gratitude to you for considering my feedback on this pivotal matter. I applaud the AUC's commitment to cultivating a more sustainable energy future for Alberta, and I eagerly anticipate the positive transformations that will emerge as a result of this thorough review.

Thank you for your time and attention.

Sincerely,

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Dear AUC Members,

I am writing as a concerned Albertan resident in response to your stakeholder feedback request, dated August 3, 2023<sup>1</sup>. **I respectfully request that the AUC end the pause and immediately recommence approvals for renewable energy projects greater than 1MW.** I believe the decision to pause renewable projects of greater than 1MW<sup>2</sup> is unnecessary, will threaten thousands of jobs, will increase electricity costs for all ratepayers, will stifle billions of dollars in



investment, and will slow efforts to address climate change. Alberta is the solar powerhouse of Canada, and we need to maintain our competitive edge.

I understand that you have a number of concerns you are seeking to address<sup>3</sup>:

- With respect to **land reclamation** concerns, please note that solar sites will remain viable well past the end of life of the original panels, and this will significantly reduce land reclamation needs. Additionally, The Government of Alberta already has reclamation [Guidelines for Renewable Energy Operations](#) which address this matter.
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- With respect to **land use** concerns, such as food security, wetland preservation and wildlife conservation, Solar Alberta has already created highly relevant Solar Siting Recommendations: <https://solaralberta.ca/solar-siting-recommendations/>. I believe you could review and adopt protocols such as these without a pause on approvals.

If the Government of Alberta and the AUC are unwilling to immediately end the pause, I respectfully request that you continue to fully process new and existing excluded applications without issuing any approvals until after the pause period (Option 3 in your announcement).

Thank you for considering my request.

Sincerely,

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Considering that a predictable and consistent regulatory regime is key for developing and maintaining Alberta's electrical infrastructure, we were unpleasantly surprised by the surprise order in council to pause approvals for a number of proposed new renewable power facilities. We do not agree with moving the goal posts for applications that have already been accepted and are at various stages in process. This pause will add additional and avoidable cost to applicants and may result in some projects to be prematurely abandoned. Also, we don't think there is any justifiable reason to single out the renewables industry, and we think that such a review can take place without pausing applications that are currently before the commission. E.g. thermal power plants raise the same questions and should be included in the review.

To minimize the damage to the extent possible, we suggest offering applicants the option of having their application processed as far as possible on all aspects outside the review - in other words, approval hold only. Regardless, these applications should be decided upon under the current regime in our opinion.

Sincerely,

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Dear AUC Members,

I am writing as a concerned Albertan resident in response to your stakeholder feedback request, dated August 3, 2023. I respectfully request that the AUC end the pause and immediately recommence approvals for renewable energy projects greater than 1MW.

I believe the decision to pause renewable projects of greater than 1MW is unnecessary, will threaten thousands of jobs, will increase electricity costs for all ratepayers, will stifle billions of dollars in investment, and will slow efforts to address climate change. Alberta is the solar powerhouse of Canada, and we need to maintain our competitive edge.

I understand that you have a number of concerns you must address, and I agree that all of the concerns need to be considered and legislated. I do not, however, think that a pause is necessary - the Alberta government develops legislation during project approval and development all the time (rewriting the school curriculum, developing reclamation guidelines or changing approval processes for oilsands etc.). The only difference I can see, is that this time it is renewable energy. I understand that the AUC is not involved in the oilsands, however, I would like to point out the hypocrisy of allowing oilsand mines to leave tailings in toxic ponds for decades, while putting a pause on renewable energy because of reclamation concerns.

I would like to suggest that solar panels should not be put on native prairie or agricultural land. I've driven past the solar array near Genesee and I am appalled at the misuse of land - it should be in agricultural production, or it should be restored to native prairie. Land should not be sterilized with solar arrays. Solar panels should be installed on malls, on parking lots, on industrial sites, and on homes. This may not meet the needs of the stakeholders of power companies, but it does meet the needs of Albertans, who need distributed power. Distributed power that is built in cities; 1. decreases the loss of long power lines, 2. does not sterilize huge fields, and 3. negates the risk that a large solar field is all covered in snow, or destroyed by hail, and 3. provides income to business and homeowners.

I append information from Solar Alberta below. I am sure you have seen it, but I think you need to seriously rethink your information and priorities and consult with the renewable energy sector, prior to stalling projects.

- With respect to land reclamation concerns, please note that solar sites will remain viable well past the end of life of the original panels, and this will significantly reduce land reclamation needs. Additionally, The Government of Alberta already has reclamation [Guidelines for Renewable Energy Operations](#) which address this matter.
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- With respect to land use concerns, such as food security, wetland preservation and wildlife conservation, Solar Alberta has already created highly relevant Solar Siting



# AUC

Alberta Utilities Commission

Recommendations: <https://solaralberta.ca/solar-siting-recommendations/>. I believe you could review and adopt protocols such as these without a pause on approvals.

If the Government of Alberta and the AUC are unwilling to immediately end the pause, I respectfully request that you continue to fully process new and existing excluded applications without issuing any approvals until after the pause period (Option 3 in your announcement).

Thank you for reading my concerns

Sincerely,

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Dear AUC Members,

I am writing as a concerned Albertan resident in response to your stakeholder feedback request, dated August 3, 2023<sup>1</sup>. **I respectfully request that the AUC end the pause and immediately recommence approvals for renewable energy projects greater than 1MW.** I believe the decision to pause renewable projects of greater than 1MW<sup>2</sup> is unnecessary, will threaten thousands of jobs, will increase electricity costs for all ratepayers, will stifle billions of dollars in investment, and will slow efforts to address climate change. Alberta is the solar powerhouse of Canada, and we need to maintain our competitive edge.

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If the Government of Alberta and the AUC are unwilling to immediately end the pause, I respectfully request that you continue to fully process new and existing excluded applications without issuing any approvals until after the pause period (Option 3 in your announcement).

Thank you for considering my request.

Dear Alberta Utilities Commission,

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Firstly, I appreciate the AUC's initiative in seeking feedback from stakeholders regarding the implementation of the approval pause. It is evident that decisions of this nature have significant implications for our province's energy landscape and future sustainability.

In response to the options presented, I am in favor of **Option 1**, which involves a comprehensive review of the entire process. My rationale for supporting this option is rooted in the belief that the current approach necessitates a thorough re-evaluation. Several factors contribute to this viewpoint.

The concerns I have pertain to the entire renewable energy approval process, ranging from the signing of lease options prior to public consultation, to the limited input provided by communities on AEPA environmental referral reports, and the rigid legal expert requirements stipulated by the AUC. This combination of factors makes it challenging for the public to meaningfully participate in a cost-effective manner. Consequently, I believe that a comprehensive review, conducted through a public inquiry, is necessary to address these issues comprehensively.

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In light of the aforementioned challenges and potential setbacks, I believe that the decision to pause the approval process is prudent. This temporary pause not only acknowledges the need for reform but also allows for a comprehensive review that ensures all aspects of the process are thoroughly examined and improved upon.





In conclusion, I support **Option 1** due to the necessity of a comprehensive review that addresses the current shortcomings in the renewable energy approval process. The ultimate goal should be to establish a more transparent, participatory, and efficient process that encourages meaningful stakeholder input and promotes responsible renewable energy development in our province.

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Alberta Utilities Commission

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Firstly, I appreciate the AUC's initiative in seeking feedback from stakeholders regarding the implementation of the approval pause. It is evident that decisions of this nature have significant implications for our province's energy landscape and future sustainability.

In response to the options presented, I am in favor of **Option 1**, which involves a comprehensive review of the entire process. My rationale for supporting this option is rooted in the belief that the current approach necessitates a thorough re-evaluation. Several factors contribute to this viewpoint.

The concerns I have pertain to the entire renewable energy approval process, ranging from the signing of lease options prior to public consultation, to the limited input provided by communities on AEPA environmental referral reports, and the rigid legal expert requirements stipulated by the AUC. This combination of factors makes it challenging for the public to meaningfully participate in a cost-effective manner.



Consequently, I believe that a comprehensive review, conducted through a public inquiry, is necessary to address these issues comprehensively.

Given the complexities and intricacies involved, I am apprehensive about the efficacy of continuing with the approval review process as outlined in Options 2 and 3. If the AUC proceeds with accepting applications and executes partial processes under the existing guidelines, it could imply that substantive changes are unlikely. However, if substantial modifications are eventually introduced, re-evaluating all submitted applications would be an inefficient utilization of time and resources for both applicants and the AUC.

In light of the aforementioned challenges and potential setbacks, I believe that the decision to pause the approval process is prudent. This temporary pause not only acknowledges the need for reform but also allows for a comprehensive review that ensures all aspects of the process are thoroughly examined and improved upon.

In conclusion, I support **Option 1** due to the necessity of a comprehensive review that addresses the current shortcomings in the renewable energy approval process. The ultimate goal should be to establish a more transparent, participatory, and efficient process that encourages meaningful stakeholder input and promotes responsible renewable energy development in our province.

Thank you for considering my feedback on this critical matter. I appreciate the AUC's dedication to fostering a more sustainable energy future for Alberta, and I look forward to witnessing the positive changes that will arise from this review.

Sincerely,

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Dear Alberta Utilities Commission (AUC),

I am writing to provide my input and perspective on the recent announcement by you, the Alberta Utilities Commission (AUC) regarding the temporary PAUSE on approvals for new renewable electricity generation projects. As a concerned stakeholder deeply invested in the future of our province's energy landscape and sustainability, I believe it is crucial to share my thoughts on this matter.

I commend the AUC for taking the initiative to seek feedback from stakeholders like myself regarding the implementation of the approval pause. It is clear that decisions of this magnitude have far-reaching implications, and engaging stakeholders in the process is a commendable approach.

After careful consideration of the options presented, **I am in favor of Option 1**, which involves a comprehensive review of the entire process. My rationale for supporting this option is rooted in the belief that the current approach necessitates a thorough re-evaluation. Several factors contribute to this viewpoint.

The concerns I have pertain to various aspects of the renewable energy approval process. These concerns range from the practice of signing lease options before adequate public consultation, to the limitations placed on community input concerning AEPA environmental referral reports, and the stringent legal expert requirements imposed by the AUC. This combination of factors creates barriers that hinder meaningful public participation in a cost-effective manner. Consequently, I firmly believe that a comprehensive review, conducted through a transparent and inclusive public inquiry, is essential to comprehensively address these issues.

Given the intricate nature of these challenges, I am apprehensive about the potential efficacy of continuing with the approval review process as outlined in Options 2 and 3. If the AUC were to proceed with accepting applications and conduct partial processes under the existing guidelines, it could signal a reluctance to make substantive changes. However, if substantial modifications are eventually introduced, re-evaluating all submitted applications would likely prove to be an inefficient allocation of time and resources for both applicants and the AUC.

Considering the aforementioned challenges and potential pitfalls, I firmly believe that the decision to pause the approval process is a prudent one. This temporary pause not only acknowledges the need for reform but also offers an opportunity for a comprehensive review that ensures all facets of the process are meticulously examined and improved upon.

In conclusion, **I stand in support of Option 1** due to the imperative need for a comprehensive review that effectively addresses the current shortcomings in the renewable energy approval process. The overarching objective should be the establishment of a transparent, participatory, and streamlined process that fosters meaningful stakeholder input and facilitates responsible renewable energy development within our province.



I extend my gratitude to you for considering my feedback on this pivotal matter. I applaud the AUC's commitment to cultivating a more sustainable energy future for Alberta, and I eagerly anticipate the positive transformations that will emerge as a result of this thorough review.

Thank you for your time and attention.

Sincerely,

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Dear Alberta Utilities Commission (AUC),

I am writing to provide my input and perspective on the recent announcement by you, the Alberta Utilities Commission (AUC) regarding the temporary PAUSE on approvals for new renewable electricity generation projects. As a concerned stakeholder deeply invested in the future of our province's energy landscape and sustainability, I believe it is crucial to share my thoughts on this matter.

I commend the AUC for taking the initiative to seek feedback from stakeholders like myself regarding the implementation of the approval pause. It is clear that decisions of this magnitude have far-reaching implications, and engaging stakeholders in the process is a commendable approach.

After careful consideration of the options presented, **I am in favor of Option 1**, which involves a comprehensive review of the entire process. My rationale for supporting this option is rooted in the belief that the current approach necessitates a thorough re-evaluation. Several factors contribute to this viewpoint.

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Considering the aforementioned challenges and potential pitfalls, I firmly believe that the decision to pause the approval process is a prudent one. This temporary pause not only acknowledges the need for reform but also offers an opportunity for a comprehensive review that ensures all facets of the process are meticulously examined and improved upon.

In conclusion, **I stand in support of Option 1** due to the imperative need for a comprehensive review that effectively addresses the current shortcomings in the renewable energy approval process. The overarching objective should be the establishment of a transparent, participatory, and streamlined process that fosters meaningful stakeholder input and facilitates responsible renewable energy development within our province.

I extend my gratitude to you for considering my feedback on this pivotal matter. I applaud the AUC's commitment to cultivating a more sustainable energy future for Alberta, and I eagerly anticipate the positive transformations that will emerge as a result of this thorough review.

Thank you for your time and attention.

Sincerely,

Denis Dentinger

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Dear AUC Members,

I am writing as a concerned Albertan resident in response to your stakeholder feedback request, dated August 3, 2023<sup>1</sup>. **I respectfully request that the AUC end the pause and immediately**



**recommence approvals for renewable energy projects greater than 1MW.** I believe the decision to pause renewable projects of greater than 1MW<sup>2</sup> is unnecessary, will threaten thousands of jobs, will increase electricity costs for all ratepayers, will stifle billions of dollars in investment, and will slow efforts to address climate change. Alberta is the solar powerhouse of Canada, and we need to maintain our competitive edge.

I understand that you have a number of concerns you are seeking to address<sup>3</sup>:

- With respect to **land reclamation** concerns, please note that solar sites will remain viable well past the end of life of the original panels, and this will significantly reduce land reclamation needs. Additionally, The Government of Alberta already has reclamation [Guidelines for Renewable Energy Operations](#) which address this matter.
- With respect to **end of life** concerns for renewable energy infrastructure disposal, the Alberta Recycling Management Authority (ARMA) is already piloting reuse and recycle programs for solar PV. Given that the majority of solar being installed today will be in operation for well over 25 years, ARMA is really out ahead on this matter.
- With respect to **land use** concerns, such as food security, wetland preservation and wildlife conservation, Solar Alberta has already created highly relevant Solar Siting Recommendations: <https://solaralberta.ca/solar-siting-recommendations/>. I believe you could review and adopt protocols such as these without a pause on approvals.

If the Take Back Alberta (Government of Alberta) and the AUC are unwilling to immediately end the pause, I respectfully request that you continue to fully process new and existing excluded applications without issuing any approvals until after the pause period (Option 3 in your announcement).

Thank you for considering my request.

Sincerely,

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Dear AUC Members,

I am writing as a concerned Albertan resident in response to your stakeholder feedback request, dated August 3, 2023<sup>1</sup>. **I respectfully request that the AUC end the pause and immediately recommence approvals for renewable energy projects greater than 1MW.** I believe the decision to pause renewable projects of greater than 1MW<sup>2</sup> is unnecessary, will threaten thousands of jobs, will increase electricity costs for all ratepayers, will stifle billions of dollars in investment, and will slow efforts to address climate change. Alberta is the solar powerhouse of Canada, and we need to maintain our competitive edge.

I understand that you have a number of concerns you are seeking to address<sup>3</sup>:



# AUC

Alberta Utilities Commission

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If the Government of Alberta and the AUC are unwilling to immediately end the pause, I respectfully request that you continue to fully process new and existing excluded applications without issuing any approvals until after the pause period (Option 3 in your announcement).

Thank you for considering my request.

Sincerely,

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If the Government of Alberta and the AUC are unwilling to immediately end the pause, I respectfully request that you continue to fully process new and existing excluded applications without issuing any approvals until after the pause period (Option 3 in your announcement).  
Thank you for considering my request.

Sincerely,

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If the Government of Alberta and the AUC are unwilling to immediately end the pause, I respectfully request that you continue to fully process new and existing excluded applications without issuing any approvals until after the pause period (Option 3 in your announcement).

Thank you for considering my request.

Sincerely,

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I am writing as a concerned Albertan resident in response to your stakeholder feedback request, dated August 3, 2023<sup>1</sup>. **I respectfully request that the AUC end the pause and immediately recommence approvals for renewable energy projects greater than 1MW.** I believe the decision to pause renewable projects of greater than 1MW<sup>2</sup> is unnecessary, will threaten thousands of jobs, will increase electricity costs for all ratepayers, will stifle billions of dollars in investment, and will slow efforts to address climate change. Alberta is the solar powerhouse of Canada, and we need to maintain our competitive edge.

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If the Government of Alberta and the AUC are unwilling to immediately end the pause, I respectfully request that you continue to fully process new and existing excluded applications without issuing any approvals until after the pause period (Option 3 in your announcement).

Thank you for considering my request.

Sincerely,

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To whom it may concern,

I am writing this as a concerned citizen and land owner in Alberta. I am in complete disagreement with the wind towers and wind farms being created in Alberta, partially in and around where I live in Special Areas. They are completely ruining our prairie landscape.



The wind towers do not produce enough energy to pay for themselves, they provide more of a tax credit profiting the large corporations. The wind turbines are expensive to maintain and their true life is not as long as citizens are made to believe.

We are made to believe wind energy is efficient and cost effective. Have people actually taken time to look at the vehicles and equipment used to store, move and build the towers? Have they looked at the amount of natural land disturbed to create the cement and gravel pad for the towers to be built on? Have they considered the damage being done to the highways by the extra traffic and heavy loads being hauled for the creation of the wind towers? We see this extra traffic every day from the tower's construction in this area. All workers are driving their own vehicles to site all gas powered, all semis are diesel powered, pilot trucks are gas powered, it would be nice to see them driving electric and leading by example.

What about the caveats these corporations put on the land? The landowners are pretty much being coerced into signing their land up in promises of big returns to find out that maybe they can not sell the land as the caveat will prevent banks from issuing loans for affected land. Contracts even go as far to say that the company with the towers having power of attorney on said lands, landowners cannot hunt or build any buildings on land occupied by a windtower. Caveats are being placed on the entire quarter of land, rather than only on the portion of the quarter affected by the wind tower.

I hope the Province of Alberta does the right thing and stops all upcoming and future wind tower/farm development. The AUC should adhere to complete abeyance and take no further steps to issue or approve wind farms/towers, and stop any in progress projects.

Yours Truly,

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Dear AUC Members,

I am writing as a concerned Albertan resident in response to your stakeholder feedback request, dated August 3, 2023<sup>1</sup>. **I respectfully request that the AUC end the pause and immediately recommence approvals for renewable energy projects greater than 1MW.** I believe the decision to pause renewable projects of greater than 1MW<sup>2</sup> is unnecessary, will threaten thousands of jobs, will increase electricity costs for all ratepayers, will stifle billions of dollars in investment, **and will slow efforts to address climate change.**

Alberta is the solar powerhouse of Canada, and we need to maintain our competitive edge.

I understand that you have a number of concerns you are seeking to address<sup>3</sup>:

- With respect to **land reclamation** concerns, please note that solar sites will remain viable well past the end of life of the original panels, and this will significantly reduce land reclamation needs. Additionally, The Government of Alberta already has reclamation [Guidelines for Renewable Energy Operations](#) which address this matter.
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If the Government of Alberta and the AUC are unwilling to immediately end the pause, I respectfully request that you continue to fully process new and existing excluded applications without issuing any approvals until after the pause period (Option 3 in your announcement).

Thank you for your respect and considering my request.

Sincerely,

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Dear Alberta Utilities Commission (AUC),

I am writing to provide my input and perspective on the recent announcement by you, the Alberta Utilities Commission (AUC) regarding the temporary PAUSE on approvals for new renewable electricity generation projects. As a concerned stakeholder deeply invested in the future of our province's energy landscape and sustainability, I believe it is crucial to share my thoughts on this matter.

I commend the AUC for taking the initiative to seek feedback from stakeholders like myself regarding the implementation of the approval pause. It is clear that decisions of this magnitude have far-reaching implications, and engaging stakeholders in the process is a commendable approach.

After careful consideration of the options presented, **I am in favor of Option 1**, which involves a comprehensive review of the entire process. My rationale for



supporting this option is rooted in the belief that the current approach necessitates a thorough re-evaluation. Several factors contribute to this viewpoint.

The concerns I have pertain to various aspects of the renewable energy approval process. These concerns range from the practice of signing lease options before adequate public consultation, to the limitations placed on community input concerning AEPA environmental referral reports, and the stringent legal expert requirements imposed by the AUC. This combination of factors creates barriers that hinder meaningful public participation in a cost-effective manner. Consequently, I firmly believe that a comprehensive review, conducted through a transparent and inclusive public inquiry, is essential to comprehensively address these issues.

Given the intricate nature of these challenges, I am apprehensive about the potential efficacy of continuing with the approval review process as outlined in Options 2 and 3. If the AUC were to proceed with accepting applications and conduct partial processes under the existing guidelines, it could signal a reluctance to make substantive changes. However, if substantial modifications are eventually introduced, re-evaluating all submitted applications would likely prove to be an inefficient allocation of time and resources for both applicants and the AUC.

Considering the aforementioned challenges and potential pitfalls, I firmly believe that the decision to pause the approval process is a prudent one. This temporary pause not only acknowledges the need for reform but also offers an opportunity for a comprehensive review that ensures all facets of the process are meticulously examined and improved upon.

In conclusion, **I stand in support of Option 1** due to the imperative need for a comprehensive review that effectively addresses the current shortcomings in the renewable energy approval process. The overarching objective should be the establishment of a transparent, participatory, and streamlined process that fosters meaningful stakeholder input and facilitates responsible renewable energy development within our province.

I extend my gratitude to you for considering my feedback on this pivotal matter. I applaud the AUC's commitment to cultivating a more sustainable energy future



for Alberta, and I eagerly anticipate the positive transformations that will emerge as a result of this thorough review.

Thank you for your time and attention.

Sincerely,

Larry Leger

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Dear AUC Members, I am writing as a concerned Albertan in response to your stakeholder feedback request, dated August 3, 2023 (1). I respectfully request that the AUC end the pause and immediately recommence approvals for renewable energy projects greater than 1MW. I believe the decision to pause renewable projects of greater than 1MW(2) is unnecessary, will threaten thousands of jobs, will increase electricity costs for all ratepayers, and will stifle tens of billions of dollars in investment. Alberta is the solar powerhouse of Canada, and we need to maintain our competitive edge. I understand that you have a number of concerns you are seeking to address (3): With respect to land reclamation concerns, please note that solar sites will remain viable well past the end of life of the original panels, and this will significantly reduce land reclamation needs. Additionally, The Government of Alberta already has reclamation Guidelines for Renewable Energy Operations which address this matter. With respect to end of life concerns for renewable energy infrastructure disposal, the Alberta Recycling Management Authority (ARMA) is already piloting reuse and recycle programs for solar PV. Given that the majority of solar being installed today will be in operation for well over 25 years, ARMA is really out ahead on this matter. With respect to land use concerns, such as food security, wetland preservation and wildlife conservation, Solar Alberta has already created highly relevant Solar Siting Recommendations: <https://solaralberta.ca/solar-siting-recommendations/>. I believe you could review and adopt protocols such as these without a pause on approvals. I am disappointed that all the options were for some amount of pause because it really isn't needed. However, if the Government of Alberta and the AUC are unwilling to immediately end the pause, I respectfully request that you continue to fully process new and existing excluded applications without issuing any approvals until after the pause period (Option 3 in your announcement). Thank you for considering my request. Sincerely,

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Hello AUC Members,

I hope this message finds you well. I'm reaching out regarding the recent stakeholder feedback request dated August 3, 2023<sup>1</sup>, and I'd like to share my perspective.

I'm a concerned resident of Alberta, and I truly support the cause. My request is straightforward: I kindly urge the AUC to consider resuming approvals for renewable energy projects exceeding 1MW<sup>2</sup>. The ongoing pause raises concerns about employment stability, electricity costs, investments, and our climate action efforts. Alberta's position as a solar energy leader in Canada is a distinction worth preserving.



I acknowledge the multifaceted concerns you're addressing<sup>3</sup>:

**Land Reclamation:** It's worth noting that solar sites remain viable well beyond panel life cycles, which can significantly reduce land reclamation demands. Additionally, the Government of Alberta's existing reclamation Guidelines for Renewable Energy Operations seem well-equipped to handle this aspect.

**Infrastructure End of Life:** On the issue of responsible disposal, the Alberta Recycling Management Authority's (ARMA) initiatives to pilot reuse and recycle programs for solar PV are commendable. Given the extended operational lifespan of modern solar installations, ARMA's efforts appear promising.

**Land Use Considerations:** Concerns about land use, including food security and wildlife conservation, are valid. The Solar Siting Recommendations outlined by Solar Alberta (<https://solaralberta.ca/solar-siting-recommendations/>) offer valuable insights that could potentially be integrated without necessitating a complete pause on approvals.

Should an immediate end to the pause not align with current considerations, I respectfully propose that the processing of both new and existing excluded applications be upheld. However, the actual approvals could be withheld until after the pause period, akin to Option 3 in your announcement.

I genuinely appreciate your attention to this matter and the potential impact of your decisions. Alberta's renewable energy future is at a crossroads, and your thoughtful actions can make a significant difference.

Thank you for your time and consideration.

Best regards,

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Dear AUC Members,

I am writing as a concerned Albertan resident in response to your stakeholder feedback request, dated August 3, 2023<sup>1</sup>. **I respectfully request that the AUC end the pause and immediately recommence approvals for renewable energy projects greater than 1MW.** I believe the decision to pause renewable projects of greater than 1MW<sup>2</sup> is unnecessary, will threaten thousands of jobs, will increase electricity costs for all ratepayers, will stifle billions of dollars in investment, and will slow efforts to address climate change. Alberta is the solar powerhouse of Canada, and we need to maintain our competitive edge.

I understand that you have a number of concerns you are seeking to address<sup>3</sup>:

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If the Government of Alberta and the AUC are unwilling to immediately end the pause, I respectfully request that you continue to fully process new and existing excluded applications without issuing any approvals until after the pause period (Option 3 in your announcement).

Thank you for considering my request.

Sincerely,

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My name is XXXXXXX and I am a stakeholder in the Northern Valley where a wind project is being proposed. I would like to make known , as a stakeholder, that it is necessary that a "complete abeyance" be enacted in order to properly review the entire regulatory application process. My legal representation, Willms & Shier, has explained our rationale, which I have attached to this email. These wind turbines kill more birds than a regular house cat will ever dream of. Also if you're gonna do a study to see what kind of animals are in the affected area of these horrific monstrosities, itt should be done in the summer when the migratory animals come back to the nesting ground on which they thrive on!

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# AUC

Alberta Utilities Commission

**Re: Six-Month Approvals Pause Feedback - Northern Valley Families Support a Complete Abeyance of Approvals for New Renewable Electricity Generation**

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Willms & Shier Environmental Lawyers LLP is environmental legal counsel to approximately 50 families in Northern Valley, Alberta. Our clients reside immediately adjacent to the Northern Valley Wind Project currently proposed by Elemental Energy.

We understand that the Alberta Utilities Commission (the “AUC”) is seeking stakeholder feedback about its implementation of a six-month moratorium on approvals for new renewable electricity generation.

For the reasons outlined below, our clients respectfully submit that a six-month complete abeyance of approvals is appropriate during which time the AUC:

- 1 does not accept new applications,
- 2 places all existing excluded applications on hold, and
- 3 takes no further steps to complete their record or issue decisions.

**COMPLETE ABEYANCE OF APPROVALS NECESSARY FOR PROCESS RE-EVALUATION**

Our clients strongly support a review of the entire AUC approvals process. This includes addressing issues spanning from the signing of lease options before public consultation, to the lack of input from communities on Alberta Environment and Protected Area environmental reports, through to the AUC’s mandate and its applicable test for granting approvals.

Given the ongoing re-evaluation of the entire AUC process, our clients' view is that a complete abeyance of approvals during the six-month moratorium is the most appropriate course of action.

The alternate options being considered by the AUC, including a partial abeyance or a hold on issuing approvals until after the moratorium, are not consistent with the purpose of the AUC process review. Under these options, if the public inquiry leads to changes in the AUC approvals process, existing applications would likely have to be resubmitted and reviewed again at significant time and financial expense to all parties involved. Similarly, existing projects in the pre-AUC application phase may be preparing materials based on a set of requirements that may change.

### **COMPLETE ABEYANCE REQUIRED FOR PROCEDURAL FAIRNESS**

Taking any approach other than a complete abeyance during the review process would, in our view, also breach the principles of procedural fairness and legitimate expectation.

The Supreme Court of Canada in *Baker v Canada (Minister of Citizenship & Immigration)* set out guiding principles as follows:<sup>1</sup>

... if a legitimate expectation is found to exist, this will affect the content of the duty of fairness owed to the individual or individuals affected by the decision. If the claimant has a legitimate expectation that a certain procedure will be followed, this procedure will be required by the duty of fairness: . . . . Nevertheless, the doctrine of legitimate expectations cannot lead to substantive rights outside the procedural domain. This doctrine, as applied in Canada, is based on the principle that the "circumstances" affecting procedural fairness take into account the promises or regular practices of administrative decision-makers, and that it will generally be unfair for them to act in contravention of representations as to procedure, or to backtrack on substantive promises without according significant procedural rights. [Emphasis added, portions of the quoted paragraph and citations omitted.]

*Schwarz Hospitality Group Ltd. v. Canada (Minister of Canadian Heritage)*<sup>2</sup> followed *Baker* and presents a cautionary take for administrative decision-makers in the midst of a moratorium.

In *Schwarz*, the Minister of Canadian Heritage imposed a one-year development moratorium for certain types of development in Banff National Park for the purpose of reviewing the guidelines applicable in the circumstances. Notwithstanding the moratorium, Officials at Parks Canada continued to consult with a developer about an existing development proposal.



This ongoing consultation – akin to the partial abeyance options being considered by the AUC – resulted in the developer successfully bringing a *mandamus* order against Parks Canada requiring Parks Canada to adjudicate on the developer’s proposal in accordance with the original approval process and guidelines in place before the moratorium was implemented.

This outcome was entirely antithetical to the purpose of the moratorium.

### CONCLUSION

Our clients respectfully submit that a complete abeyance moratorium, rather than a partial one, is the best course of action to both:

- 1 permit all stakeholders and the AUC to start afresh under any revised AUC procedures, and
- 2 maintain consistency within the AUC’s existing duty of procedural fairness.

Yours truly,

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Dear Ms. Rees,

On behalf of Nu-E Corp, I am writing to express our concern and objection to your August 3, 2023 decision to pause the approval of new renewable electricity generation projects. Nu-E is a renewable energy developer based in Calgary, and this pause threatens to disrupt our significant capital investment in the province. We urge you to reconsider this decision and take immediate action to resume the approval process. We expect your prompt response and hope to engage in a constructive dialogue that advances Alberta’s position as a global leader in energy development and investment.

Thank you,

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#### **RE: AUC to launch inquiry, implement pause on approvals for new renewable electricity generation**

Dear Ms. Rees,

Nu-E Corp (Nu-E) is a North American renewable energy developer based in Calgary, with a mandate to invest up to \$1.5 billion in PV Solar and other ‘green’ energy projects in Alberta by 2030. We recently entered into an agreement with a UK based infrastructure fund to underpin our ability to reach this goal. As with most industry players, we were very surprised by the AUC’s recent announcement to pause approvals for new renewable electricity generation in Alberta. We believe that the AUC’s concerns and those of the Alberta Government, which have been widely reported recently, can be resolved by collaborating with renewable energy developers, energy infrastructure experts, and the investment community, without shutting down the industry completely – even for a few short months.

The proposed inquiry jeopardizes the significant pre-construction development capital already invested by Nu-E and all project developers in Alberta. If the proposed hiatus is implemented, investment dollars spent on the identification and de-risking of projects before entering into the AUC’s regulatory process could leave the province. Once deployed in other jurisdictions, not only will those funds not be spent in Alberta, but they also set the course for subsequent project development and final project investment in



those jurisdictions. The knock-on effects could significantly slow the orderly development of renewables in Alberta, directly contradicting the stated goals of both the AUC and the government of Alberta. Further, the proposed abeyance could not only derail capital investment already earmarked by Nu-E, but it could also affect the ability for Nu-E and other project developers to source new capital for developments in Alberta after the moratorium is lifted. We are deeply alarmed by the potential detrimental effects of the suspension on our existing portfolio of partially developed projects. This holds especially true for our project partners and suppliers across rural Alberta, not to mention the effect on Alberta's position as a global hub for both conventional and low-carbon energy investments.

Nu-E wishes to maintain our commitment to Alberta's low-carbon energy development. It is therefore our obligation to advocate for a strategy that aligns with our shared vision. The AUC's proposed pause on approvals introduces a level of uncertainty for our investors, suppliers, and project funding partners. The competition for financial capital on the international stage is fierce. Nu-E collaborates with global financial partners, who deploy resources worldwide, and they prioritize stability and predictability when making sizable investments. Unfortunately, the proposed moratorium risks diverting our resources away from Alberta towards more predictable jurisdictions, compromising both our investments and the province's economic growth.

Nu-E's response to the AUC's stated concerns on renewable development in Alberta is as follows:

**Development on Specific Types of Land:** We have diligently collaborated with landowners to ensure mutually beneficial outcomes from renewable power projects. Acknowledging private landowners' autonomy over their property utilization, in the absence of harm posed to others, fosters predictable revenue streams for landowners and communities. Landowners benefit from taking advantage of underperforming assets (usually only a portion of their landholdings) and rural communities gain valuable tax bases from which to maintain services to their constituents.

**Impact on Alberta's Viewscapes:** Alberta's natural beauty is a remarkable asset. Embracing renewable energy supports the preservation of our natural environment by combating emissions and addressing climate change, a challenge that could significantly impact our province's aesthetics. Nu-E works in concert with landowners and communities to ensure that installations meet all reasonable setbacks. Furthermore, many of our projects are situated on degraded or under-utilized lands.

**Mandatory Reclamation Security Requirements:** We endorse responsible project development and reclamation. Collaborative reclamation policies align with our current practices and elevate the industry's reputation.

**Development on Crown Lands:** Utilization of crown land presents a promising avenue for industry growth and supports Alberta's journey towards energy sustainability. However, we fail to comprehend how this warrants a required pause in the approvals of projects on private lands.

**Impact on Generation Supply Mix and Reliability:** While grid reliability is crucial, Alberta's renewable penetration remains comparatively modest when compared to electrical grids found in areas of the US or Europe. This growth can be managed effectively through advancements such as battery storage, green-hydrogen (green ammonia) production, e-fuels, and innovative transmission or distribution solutions. In addition, we believe reliability is actively managed and planned by the Alberta Electric System Operator (AESO), as addressed in their 2023 Reliability Requirements Roadmap.

While our preferred course of action would be to continue to develop and submit our Alberta based projects while working with the AUC and other stakeholders on addressing legitimate industry development concerns, we acknowledge the limited considerations being contemplated by the AUC.



Among the options, we strongly believe that the “*Approval Hold Only*” option is the least damaging to Alberta's reputation and investment competitiveness.

We urgently request immediate reconsideration and action. Alberta's clean energy future hangs in the balance, and we anticipate a thoughtful consultation that facilitates responsible investment, unhindered by avoidable obstacles.

We await your response and look forward to a productive discussion that propels Alberta forward as a global leader in energy development and investment.

Sincerely,

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Hello,

First would like to thank Danielle Smith for putting a hold on wind and solar projects. Would ask that the hold be extended to all projects that are not built yet as well even though already have been “approved”. Asking this because well the AUC has approved them many of them are considered moderate/high risk in different aspects by the Alberta Environment. Yet they have been considered to be in the public best interest even though many have opposed them, the interveners going to hearings and providing a lot of evidence showing otherwise.

Many reasons all wind & solar projects should be reassessed and or stopped completely

This letter will give points about turbines since that is what have had dealings with .Solar should only be put on land that has to be reclaim such as transfer sites etc or on already built structures (cities are full of rooftops).

1) The setbacks ( for wildlife, humans, etc) have not increased even though the size of the turbines have. The turbines being built now are 5MW, yet the setbacks are the same as they were for 2 or 3MW ones. Well larger turbines may make so they put up less , all there negative aspects are multiplied .

2) In an AUC hearing there is not enough weight given to a landowner opinion if they disagree. Only “experts” looking at a computer screen are given weight of opinion and then mostly if they agree with the project. If a landowner has been a steward of the property for over 10years they should be given just as much weight as an expert. They live there and know the area, not just looking at a screen. Also when experts by interveners are found to back up their evidence such as having endangered protected species, those experts should be allowed to testify without worry as to losing their jobs( since they funded by the government).

3) There are quite a few approved projects that are labelled as moderate/high ( especially regarding endangered bats , amphibians, wetlands, and native grass)risk by Alberta Environment. Yet they are allowed IF mitigations

The wind turbine companies police themselves when it comes to mitigations. Unless there is complaints put in then nothing is ever really brought to attention what may or may not adversely be happening . All wildlife fatalities, maintenance records, contact numbers, etc should be publicly available, especially to those living close to a project area. They should be given a password or something so they can log in to see that mitigations are being followed. Many landowners are concerned about ground water being contaminated, health hazards, wildlife harm, environmental hazards- yet most of this is swept under by the project companies because they say we don't think it will be significant affect! Well in a drought prone area everything is felt as a significant affect.

4) The photo montages provided by wind & solar companies are a joke. Especially wind turbines they give these pictures that always show the turbines so tiny. Well from personal experience we were not allowed in one project,since beyond their 1500-2000m boundary baloney. But they told us we would not



be able to see the turbines that are approximately 3 miles away- well we can count with our naked eye 46 turbines everyday. And 26 blinking red lights every night( which attract bats and they are in a high risk area)

5) Also right now the grid cannot even hold anymore, it is at its capacity. This is documented as some turbine companies are currently on hold to being built and will have to reapply since the

grid is currently full. Until more transmission lines are built and the grid upgraded a lot of times the turbines are sitting idle. So these massive millions of dollar structures that took monumental amounts of resources to build are nothing but non green federal government statues of waste.

Putting up turbines or solar that are not even useful right now is like picking a house paint before the plans are even made.

6) When Turbines projects are planned they do not have to have a turbine model picked out just suggested models. They can choose that after approved! When any other person gets a permit or has to get approval to build something you have to have every exact detail shown. Yet they are allowed to make whatever adjustments after approval.

7) The surveys done, and information gathered by Turbines project companies is most time gather from the computer. A lot of times they do not even have boots on the ground. And conveniently a lot of times nests(ex. Ferruginous hawks) are knocked down or native grass is suddenly being cultivated. Turbine project companies also will pay money ( or build shops, houses)to ones not involved in the project if they sign that they will not complain(call good neighbor). They also want any complaints reported to them first, before reporting the AUC. In other areas of business this would be considered shut up or blackmail money.

8) Each turbine has approximately 700litres of oil in them and a generator run on natural gas or diesel. As well each turbine takes massive amounts of concrete which is left in the ground even after being decommissioned. Which then contaminates the underground water source for life. To make all that concrete massive amounts of sand , water and chemicals are used. The turbines are in no way green!

9) The roads being built to build and later access the turbines are also taking up a lot of precious land.

10) Decommissioning is also always left as a grey area as to who is going to pay for what? The landowner, project owners or government. And if figured out still so much is left behind to rot into the damage land.

The agricultural legacy of Alberta is being seriously decimated by the farce of idea of green energy. In years to come if these projects are continue to be allowed, sadly futures generations

-Will not be able to enjoy a star filled night sky( due to the light pollution, will not be able to see an eagle soaring high in the sky( they will be extinct), will not have quiet countryside( constant turbine noise), will not have clean air( fiberglass fragments falling off the blades), will not be able to grow food( land is taken by turbines and solar fields), will not have clean water( concrete contamination).

Climate change is needed the earth goes through phases as it has always done. Climate change is being used as a government money game, no dollar amount will change whatever amount of carbon. The earth needs carbon dioxide it is a requirement for life just as is oxygen and hydrogen etc. What should be done is using the natural processors of carbon dioxide-TREES,and other plant life. In smarter years trees for shelter belts were provided for free to landowners.

It is refreshing to see that the Alberta government is applying the brakes, so that hopefully a progressive green future can happen instead of an agricultural diasterous one. And hopefully leveling the playing field so it is not so one sided monetarily . Currently the ones with the deepest pockets win.

Sincerely,

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Dear AUC Members,

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**approvals for renewable energy projects greater than 1MW.** I believe the decision to pause renewable projects of greater than 1MW<sup>2</sup> is unnecessary, will threaten thousands of jobs, will increase electricity costs for all ratepayers, will stifle billions of dollars in investment, and will slow efforts to address climate change. Alberta is the solar powerhouse of Canada, and we need to maintain our competitive edge.

I understand that you have several concerns you are seeking to address<sup>3</sup>:

- With respect to **land reclamation** concerns, please note that solar sites will remain viable well past the end of life of the original panels, and this will significantly reduce land reclamation needs. Additionally, The Government of Alberta already has reclamation [Guidelines for Renewable Energy Operations](#) which address this matter.
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- With respect to **land use** concerns, such as food security, wetland preservation and wildlife conservation, Solar Alberta has already created highly relevant Solar Siting Recommendations: <https://solaralberta.ca/solar-siting-recommendations/>. I believe you could review and adopt protocols such as these without a pause on approvals.

If the Government of Alberta and the AUC are unwilling to immediately end the pause, I respectfully request that you continue to fully process new and existing excluded applications without issuing any approvals until after the pause period (Option 3 in your announcement).

Thank you for considering my request.

Sincerely,

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Good Afternoon

I'm a concerned Land Owner and live in the Northern Valley Area south of Elk Point Alberta. I strongly oppose the Wind Project that is being proposed within 3 miles of my homestead!

Please see the attached Letter from my Legal Representation, which explains the rational behind my opposition.

Thank you

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# AUC

Alberta Utilities Commission

**Re: Six-Month Approvals Pause Feedback - Northern Valley Families Support a Complete Abeyance of Approvals for New Renewable Electricity Generation**

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Willms & Shier Environmental Lawyers LLP is environmental legal counsel to approximately 50 families in Northern Valley, Alberta. Our clients reside immediately adjacent to the Northern Valley Wind Project currently proposed by Elemental Energy.

We understand that the Alberta Utilities Commission (the “AUC”) is seeking stakeholder feedback about its implementation of a six-month moratorium on approvals for new renewable electricity generation.

For the reasons outlined below, our clients respectfully submit that a six-month complete abeyance of approvals is appropriate during which time the AUC:

- 1 does not accept new applications,
- 2 places all existing excluded applications on hold, and
- 3 takes no further steps to complete their record or issue decisions.

**COMPLETE ABEYANCE OF APPROVALS NECESSARY FOR PROCESS RE-EVALUATION**

Our clients strongly support a review of the entire AUC approvals process. This includes addressing issues spanning from the signing of lease options before public consultation, to the lack of input from communities on Alberta Environment and Protected Area environmental reports, through to the AUC’s mandate and its applicable test for granting approvals.

Given the ongoing re-evaluation of the entire AUC process, our clients' view is that a complete abeyance of approvals during the six-month moratorium is the most appropriate course of action.

The alternate options being considered by the AUC, including a partial abeyance or a hold on issuing approvals until after the moratorium, are not consistent with the purpose of the AUC process review. Under these options, if the public inquiry leads to changes in the AUC approvals process, existing applications would likely have to be resubmitted and reviewed again at significant time and financial expense to all parties involved. Similarly, existing projects in the pre-AUC application phase may be preparing materials based on a set of requirements that may change.

### **COMPLETE ABEYANCE REQUIRED FOR PROCEDURAL FAIRNESS**

Taking any approach other than a complete abeyance during the review process would, in our view, also breach the principles of procedural fairness and legitimate expectation.

The Supreme Court of Canada in *Baker v Canada (Minister of Citizenship & Immigration)* set out guiding principles as follows:<sup>1</sup>

... if a legitimate expectation is found to exist, this will affect the content of the duty of fairness owed to the individual or individuals affected by the decision. If the claimant has a legitimate expectation that a certain procedure will be followed, this procedure will be required by the duty of fairness: . . . . Nevertheless, the doctrine of legitimate expectations cannot lead to substantive rights outside the procedural domain. This doctrine, as applied in Canada, is based on the principle that the "circumstances" affecting procedural fairness take into account the promises or regular practices of administrative decision-makers, and that it will generally be unfair for them to act in contravention of representations as to procedure, or to backtrack on substantive promises without according significant procedural rights. [Emphasis added, portions of the quoted paragraph and citations omitted.]

*Schwarz Hospitality Group Ltd. v. Canada (Minister of Canadian Heritage)*<sup>2</sup> followed *Baker* and presents a cautionary take for administrative decision-makers in the midst of a moratorium.

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This ongoing consultation – akin to the partial abeyance options being considered by the AUC – resulted in the developer successfully bringing a *mandamus* order against Parks Canada requiring Parks Canada to adjudicate on the developer’s proposal in accordance with the original approval process and guidelines in place before the moratorium was implemented.

This outcome was entirely antithetical to the purpose of the moratorium.

### CONCLUSION

Our clients respectfully submit that a complete abeyance moratorium, rather than a partial one, is the best course of action to both:

- 1 permit all stakeholders and the AUC to start afresh under any revised AUC procedures, and
- 2 maintain consistency within the AUC’s existing duty of procedural fairness.

Yours truly,

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My name is XXXXXXXX and I own a farm on NE-14-55-6 w4 and am a stakeholder in the Northern Valley where a wind project is being proposed. I would like to make known, as a stakeholder, that it is necessary that a “complete abeyance” be enacted in order to properly review the entire regulatory application process. My legal representation, Willms & Shier, has explained our rationale, which I have attached to this email.

Sincerely,

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# AUC

Alberta Utilities Commission

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Yours truly,

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Thank you for considering my request.

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To whom it may concern,

I am writing concerning your questions posed on the approval process and whether there should be complete or partial abeyance. As a stakeholder, I am asking for a **complete abeyance of approvals** in order for the *entire* approval process to be reviewed.



I am represented, also, by environmental law firm Willms & Shier. I have attached their letter which provides my rationale for a complete abeyance to allow the six month "pause" to be truly constructive.

Thank you logging my concerns.

Regards

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**Re: Six-Month Approvals Pause Feedback - Northern Valley Families Support a Complete Abeyance of Approvals for New Renewable Electricity Generation**

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Alberta Utilities Commission

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## END THE PAUSE ON RENEWABLES APPROVALS IN ALBERTA NOW

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Dear AUC Members,

I am writing as a concerned Albertan resident in response to your stakeholder feedback request, dated August 3, 2023<sup>1</sup>. **I respectfully request that the AUC end the pause and immediately recommence approvals for renewable energy projects greater than 1MW.** I believe the decision to pause renewable projects of greater than 1MW<sup>2</sup> is unnecessary, will threaten thousands of jobs, will increase electricity costs for all ratepayers, will stifle billions of dollars in investment, and will slow efforts to address climate change. Alberta is the solar powerhouse of Canada, and we need to maintain our competitive edge.

I understand that you have a number of concerns you are seeking to address<sup>3</sup>:

- With respect to **land reclamation** concerns, please note that solar sites will remain viable well past the end of life of the original panels, and this will significantly reduce land reclamation needs. Additionally, The Government of Alberta already has reclamation [Guidelines for Renewable Energy Operations](#) which address this matter.
- With respect to **end of life** concerns for renewable energy infrastructure disposal, the Alberta Recycling Management Authority (ARMA) is already piloting reuse and recycle



# AUC

Alberta Utilities Commission

programs for solar PV. Given that the majority of solar being installed today will be in operation for well over 25 years, ARMA is really out ahead on this matter.

- With respect to **land use** concerns, such as food security, wetland preservation and wildlife conservation, Solar Alberta has already created highly relevant Solar Siting Recommendations: <https://solaralberta.ca/solar-siting-recommendations/>. I believe you could review and adopt protocols such as these without a pause on approvals.

If the Government of Alberta and the AUC are unwilling to immediately end the pause, I respectfully request that you continue to fully process new and existing excluded applications without issuing any approvals until after the pause period (Option 3 in your announcement).

Thank you for considering my request.

Sincerely,

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Dear AUC Members,

I am writing as a concerned Albertan resident in response to your stakeholder feedback request, dated August 3, 2023<sup>1</sup>. **I respectfully request that the AUC end the pause and immediately recommence approvals for renewable energy projects greater than 1MW.** I believe the decision to pause renewable projects of greater than 1MW<sup>2</sup> is unnecessary, will threaten thousands of jobs, will increase electricity costs for all ratepayers, will stifle billions of dollars in investment, and will slow efforts to address climate change. Alberta is the solar powerhouse of Canada, and we need to maintain our competitive edge.

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- With respect to **land reclamation** concerns, please note that solar sites will remain viable well past the end-of-life of the original panels, and this will significantly reduce land reclamation needs. Additionally, The Government of Alberta already has reclamation [Guidelines for Renewable Energy Operations](#) that address this matter.
- With respect to **end-of-life** concerns for renewable energy infrastructure disposal, the Alberta Recycling Management Authority (ARMA) is already piloting reuse and recycle programs for solar PV. Given that the majority of solar being installed today will be in operation for well over 25 years, ARMA is really out ahead on this matter.
- With respect to **land use** concerns, such as food security, wetland preservation and wildlife conservation, Solar Alberta has already created highly relevant Solar Siting Recommendations: <https://solaralberta.ca/solar-siting-recommendations/>. I believe you could review and adopt protocols such as these without a pause on approvals.



If the Government of Alberta and the AUC are unwilling to immediately end the pause, I respectfully request that you continue to fully process new and existing excluded applications without issuing any approvals until after the pause period (Option 3 in your announcement).

Thank you for considering my request.

Sincerely,

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Dear AUC Members,

I am writing as a concerned Albertan resident (and solar micro-generator) in response to your stakeholder feedback request from August 3, 2023. I respectfully request that the AUC end the pause and immediately resume issuing approvals for renewable energy projects greater than 1MW. I believe the decision to pause renewable projects of greater than 1MW is unnecessary and will threaten jobs, hobble a developing industry and market, increase electricity costs for all ratepayers, put billions of dollars in investment at risk, and slow efforts to address climate change. Alberta is the solar powerhouse of Canada, and we need to maintain our competitive edge. Such a pause feeds a negative narrative about Alberta when we, in fact, have an opportunity in front of us for Alberta to be a leader in all forms of energy generation.

I understand that you have a number of concerns you are seeking to address:

- With respect to land reclamation concerns, please note that solar sites will remain viable well past the end of life of the original panels, and this will significantly reduce land reclamation needs. Additionally, The Government of Alberta already has reclamation Guidelines for Renewable Energy Operations which address this matter.
- With respect to end of life concerns for renewable energy infrastructure disposal, the Alberta Recycling Management Authority (ARMA) is already piloting reuse and recycle programs for solar PV. Given that the majority of solar being installed today will be in operation for well over 25 years, ARMA is really out ahead on this matter.
- With respect to land use concerns, such as food security, wetland preservation and wildlife conservation, Solar Alberta has already created highly relevant Solar Siting Recommendations: <https://solaralberta.ca/solar-siting-recommendations/>. I believe you could review and adopt protocols such as these without a pause on approvals.

If the Government of Alberta and the AUC are unwilling to immediately end the pause, I respectfully request that you continue to fully process new and existing excluded applications without issuing any approvals until after the pause period (Option 3 in your announcement).

Thank you for considering my feedback and request.

Sincerely,

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Dear AUC Members,

I am writing as a concerned Alberta resident in response to your stakeholder feedback request, dated August 3, 2023.



Ramping up renewable energy in Alberta is one of the fastest and most cost-effective measures to reduce Albertan and Canadian greenhouse gas emissions. It is also the fastest way to lower electricity prices for Albertans.

Germany is now at over 50% renewable electricity for its electrical grid and has one of the most reliable systems in Europe (12.2 minutes downtime per year in 2019, almost twice as good as in 2006 when the German energy transition was just in its infancy (<https://www.cleanenergywire.org/factsheets/germanys-electricity-grid-stable-amid-energy-transition#:~:text=Germany%27s%20security%20of%20supply%20is,Only%20Switzerland%20fared%20better.>), compared to a SAIDI of 115 minutes for Canada in 2018 [ChatGTP).

A moratorium is not required to address this. After all, we are not doing a moratorium on oil and gas, even though the environmental issues and legacy concerns are far greater than those for solar and wind.

I respectfully request that the AUC end the pause and immediately recommence approvals for renewable energy projects greater than 1MW.

Thank you,

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Re: AUC Proceedings 27837 – SPWC Responses to AUC Request for Feedback on Approvals Pause

Dear Ms. Wen,

Further to your letter dated August 3, 2023, and the Government of Alberta's announcement to pause approvals of new renewable energy projects over one megawatt until February 29, 2024, the Alberta Utilities Commission (AUC) has issued a letter requesting stakeholder feedback on implementing the pause.

SPWC Development GP Inc. (SPWC), is proposing to construct and operate the Willow Ridge Wind Project (the Project), a 204.6 megawatt (MW) wind power generation and 50 MWh Battery Energy Storage System facility situated approximately 7.2 km south of Fort MacLeod, Alberta on privately owned lands within 8-26 W4M, 8-25 W4M, 7-26 W4M, and 7-25 W4M in the Municipal District (M.D.) of Willow Creek, Alberta.

SPWC has spent significant financial resources over the last five years working with private landowners and key stakeholders developing this renewable energy project. SPWC submitted the project application to the AUC on December, 2022 and it is currently planning to submit a request to be removed from a voluntary abeyance by August 18<sup>th</sup>, which was implemented to address unforeseen municipal ordinance changes resulting in minor infrastructure rerouting.

The almost seven-month unplanned and unprecedented pause implemented by the Alberta government will have significant negative implications on the proposed Project, and overall investment and development confidence in Alberta. Implications for the Project include:

- Cancelling or delaying our planned overall investment of \$460M and direct benefit to the Alberta economy;
- Significant delays to the Project schedule (resulting from, amongst other things, permitting delays, AESO delays and procurement delays);
- Energy offtake agreement negotiations severely impacted due to the regulatory uncertainty created by the pause
- Delayed financial benefits to landowners from lease payments and to the M.D. (via taxes) as a result of Project operations; and
- Project cost increases impacting financial viability due to delays in signing major agreements such as Turbine Supply Agreement, and Engineering, Procurement and Construction agreement.



Alberta Utilities Commission

In your letter of August 3, 2023, the AUC requested feedback on three potential options relative to the pause and invited comment on any additional options. SPWC believes projects that have already submitted an application to the AUC in advance of August 3, 2023 should be exempted from the 'pause' and proceed under current rules through to, and including, a decision on the applications and approval, as applicable, by the AUC. Barring this possibility, the 'next best' option would be, as proposed by the AUC, the "Approval hold only" option where the AUC continues to fully process new and existing applications without issuing any approvals until after the pause period. Of the options presented by the AUC, the "Approval hold only" is the alternative which minimizes further unwarranted delays and harms caused by the moratorium.

Finally, it should be noted that the Project has committed in the AUC application to put in place financial surety for decommissioning and reclamation. A Reclamation Plan is included in the application. This overall financial security topic was one of the items of interest that the AUC has been directed to inquire into as described in the August 3, 2023 AUC announcement. In regard to the AUC's planned consideration on development of power plants on agricultural lands, we would like to highlight that the percentage of agricultural land impacted by the Project development is less than 1.5% (approx. 27 hectares) of the Project's leased agricultural land (approximately 1830 hectares), and agricultural operations will be able to continue around the Project's turbines and associated infrastructure.

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Dear Alberta Utilities Commission,

I am writing to provide my input and perspective on the recent announcement by the Alberta Utilities Commission regarding the temporary pause on approvals for new renewable electricity generation projects. As a concerned stakeholder, I believe it is crucial to share my thoughts on this matter.

Firstly, I appreciate the AUC's initiative in seeking feedback from stakeholders regarding the implementation of the approval pause. It is evident that decisions of this nature have significant implications for our province's energy landscape and future sustainability.

In response to the options presented, I am in favor of **Option 1**, which involves a comprehensive review of the entire process. My rationale for supporting this option is rooted in the belief that the current approach necessitates a thorough re-evaluation. Several factors contribute to this viewpoint.

The concerns I have pertain to the entire renewable energy approval process, ranging from the signing of lease options prior to public consultation, to the limited input provided by communities on AEPA environmental referral





reports, and the rigid legal expert requirements stipulated by the AUC. This combination of factors makes it challenging for the public to meaningfully participate in a cost-effective manner. Consequently, I believe that a comprehensive review, conducted through a public inquiry, is necessary to address these issues comprehensively.

Given the complexities and intricacies involved, I am apprehensive about the efficacy of continuing with the approval review process as outlined in Options 2 and 3. If the AUC proceeds with accepting applications and executes partial processes under the existing guidelines, it could imply that substantive changes are unlikely. However, if substantial modifications are eventually introduced, re-evaluating all submitted applications would be an inefficient utilization of time and resources for both applicants and the AUC.

In light of the aforementioned challenges and potential setbacks, I believe that the decision to pause the approval process is prudent. This temporary pause not only acknowledges the need for reform but also allows for a comprehensive review that ensures all aspects of the process are thoroughly examined and improved upon.

In conclusion, I support **Option 1** due to the necessity of a comprehensive review that addresses the current shortcomings in the renewable energy approval process. The ultimate goal should be to establish a more transparent, participatory, and efficient process that encourages meaningful stakeholder input and promotes responsible renewable energy development in our province.

Thank you for considering my feedback on this critical matter. I appreciate the AUC's dedication to fostering a more sustainable energy future for Alberta, and I look forward to witnessing the positive changes that will arise from this review.

Sincerely,

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Dear AUC Members,



I am writing as a concerned Albertan resident in response to your stakeholder feedback request, dated August 3, 2023<sup>1</sup>. **I respectfully request that the AUC end the pause and immediately recommence approvals for renewable energy projects greater than 1MW.** I believe the decision to pause renewable projects of greater than 1MW<sup>2</sup> is unnecessary, will threaten thousands of jobs, will increase electricity costs for all ratepayers, will stifle billions of dollars in investment, and will slow efforts to address climate change. Alberta is the solar powerhouse of Canada, and we need to maintain our competitive edge.

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- With respect to **land use** concerns, such as food security, wetland preservation and wildlife conservation, Solar Alberta has already created highly relevant Solar Siting Recommendations: <https://solaralberta.ca/solar-siting-recommendations/>. I believe you could review and adopt protocols such as these without a pause on approvals.

If the Government of Alberta and the AUC are unwilling to immediately end the pause, I respectfully request that you continue to fully process new and existing excluded applications without issuing any approvals until after the pause period (Option 3 in your announcement).

Thank you for considering my request.

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In response to the options presented, I am in favor of **Option 1**, which involves a comprehensive review of the entire process. My rationale for supporting this option is rooted in the belief that the current approach necessitates a thorough re-evaluation. Several factors contribute to this viewpoint.

The concerns I have pertain to the entire renewable energy approval process, ranging from the signing of lease options prior to public consultation, to the limited input provided by communities on AEPA environmental referral reports, and the rigid legal expert requirements stipulated by the AUC. This combination of factors makes it challenging for the public to meaningfully participate in a cost-effective manner. Consequently, I believe that a comprehensive review, conducted through a public inquiry, is necessary to address these issues comprehensively.

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input and promotes responsible renewable energy development in our province.

Thank you for considering my feedback on this critical matter. I appreciate the AUC's dedication to fostering a more sustainable energy future for Alberta, and I look forward to witnessing the positive changes that will arise from this review.

Sincerely,

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EDPR Canada Ltd. (EDPR) is currently constructing the 297MW Sharp Hills Wind Project which is located in Alberta and is scheduled to reach commercial operation by the end of 2023. EDPR is also actively developing renewable energy projects within the province of Alberta. EDP Renewables North America LLC, its affiliates, and its subsidiaries develop, construct, own, and operate wind farms and solar parks throughout North America. With 58 wind farms, nine solar parks, and eight regional offices across North America, EDPR has developed more than 8,800 megawatts (MW) and operates more than 8,200 MW of onshore utility-scale renewable energy projects. EDP Renewables North America LLC and EDP Renewables Canada Ltd. are wholly owned subsidiaries of EDP Renewables SA which is a global leader in renewable energy development and ownership.

EDPR welcomes this opportunity to provide this submission to the AUC regarding the Commission's request for feedback in the implementation of the approval pause, dated August 3<sup>rd</sup>, 2023.

#### **Implementation of the Pause**

EDPR recommends the Commission implement only an Approval Hold and continue to fully process all new and existing applications during the pause period. Inquiries and reviews of regulatory requirements are common across various jurisdictions and industries throughout Canada. These inquiries are completed successfully with the implementation of recommendations in tandem with the continued submission and processing of applications. The benefits of this inquiry structure are numerous as it continues to provide a positive environment for sustainable development while encouraging continued engagement with industry and stakeholders. Furthermore, it demonstrates to industry that Alberta is committed to being an attractive place to invest while demonstrating the pragmatic commitments of Alberta's regulators and its government.

#### **Alternative Recommendation**

EDPR understands the AUC is commencing this inquiry to address the five considerations listed in their August 3<sup>rd</sup> announcement. As a secondary alternative to the above recommendation, EDPR suggests that projects which address the project-specific considerations be deemed eligible for application submittal and full processing which would include the AUC's decision during the pause. These considerations would include the following:

- 1) Demonstrate the project is situated on lands which do not have a soil classification.
- 2) Demonstrate the project is located in an area that does not impact Alberta's pristine views.
- 3) Demonstration by the project of substantial decommissioning requirements and commitments, whether with the landowner(s) or the municipal authority.

EDPR recognizes that for many years Alberta has addressed energy and resource development activities on Crown land with a goal of maximizing the public interest. Although EDPR's



activities do not involve such lands, we anticipate the province's experience and lessons-learned will guide the best outcomes for Alberta and Industry.

EDPR also recognizes the energy supply mix is an important issue which is being addressed by every major jurisdiction across North America and around the world. Geography, natural resources, market and grid design provide Alberta with additional characteristics which must be considered. The long-term nature of electricity investment and development requires that progress continue and EDPR will be ready to assist by sharing our experiences and insights.

EDPR intends to continue development of our Blue Bridge Solar Park and Sounding Creek Solar Park given a stable regulatory environment. Disruptions to regulatory processes will have an impact on the commercial success of these projects and negatively affect the ability of EDPR to reach its strategic business goals. Furthermore, companies such as EDPR will be forced to investigate other opportunities in other jurisdictions to meet these goals.

We greatly appreciate this opportunity to provide feedback to the AUC and look forward to discussing this recommendation. We believe AUC can complete this inquiry and apply its recommendations while also reducing the unnecessary risks being carried by one of Canada's most thriving industries.

Sincerely,

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Dear AUC Members,

I am writing as a concerned Albertan in response to your stakeholder feedback request, dated August 3, 2023<sup>1</sup>. **I respectfully request that the AUC end the pause and immediately recommence approvals for renewable energy projects greater than 1MW.** I believe the decision to pause renewable projects of greater than 1MW<sup>2</sup> is unnecessary, will threaten thousands of jobs, will increase electricity costs for all ratepayers, will stifle billions of dollars in investment, and will slow efforts to address climate change. Alberta is the solar powerhouse of Canada, and we need to maintain our competitive edge.

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If the Government of Alberta and the AUC are unwilling to immediately end the pause, I respectfully request that you continue to fully process new and existing excluded applications without issuing any approvals until after the pause period (Option 3 in your announcement).

Thank you for considering my request.

Sincerely,

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Dear Mr. Mousseau:

Starlight Energy LP (“**Starlight**” or “**we**”) is writing to provide feedback and comments regarding the Alberta Utilities Commission (“**AUC**” or “**Commission**”) announcement of the upcoming inquiry into the ongoing economic, orderly, and efficient development of electricity generation in Alberta, as well as the proposed pause on approvals for power plants and hydro developments producing renewable electricity greater than one megawatt.

Starlight Background

Starlight is the NextEnergy Group’s project development division, which is currently developing more than 9GW of renewable energy assets across five jurisdictions (UK, Italy, Greece, Romania and Canada) and four technologies (solar PV, battery energy storage systems, wind both on- and off-shore and green hydrogen production facilities). The other two divisions of the NextEnergy Group are:

- NextEnergy Capital, one of the largest investors in the solar PV and battery energy storage system globally, with more than \$3.7bn of assets under management in an over 2.4GW renewable portfolio operating in eight countries, and
- WiseEnergy, one of the largest operating asset managers globally, manages more than 1.8GW of solar PV and battery energy storage systems from a technical, administrative, financial, corporate, tax and accounting perspective.

Overall, the NextEnergy Group employs nearly 300 people in four main hubs: London (UK), Milan (Italy), Madrid (Spain) and Hyderabad (India).

Starlight has made significant multi-million-dollar investments to develop a portfolio of nearly 1,000 MWdc of early to mid-stage solar PV projects in Alberta, hiring a local representative and involving several local reputable advisors and consultants in the development process.

Several of the projects in Starlight’s portfolio are scheduled to file an AUC application in the next three months. The August 3<sup>rd</sup> announcement came as a surprise and shock to many players in the industry, and as a foreign operator in the solar PV space, this is of particular concern to us, given our timelines to enter the AUC permitting process and our plans for future investment in Alberta.

Investment in Alberta

Starlight’s perceived attraction to investing in Alberta was due to, among other things, the business-friendly environment and stable and predictable regulatory regime.

Starlight was formed to develop renewable energy projects up to the ‘ready to build’ stage, at which point the projects are sold to one of the funds managed by NextEnergy Capital. NextEnergy Capital has just launched its latest international private equity fund, with a target capital raise of US\$1.5bn and a first close already achieved at US\$480m with investors such as KLP, a German occupational pension fund, and a large Nordic pension fund. This fund is the successor to another NextEnergy Capital international private equity fund, which has successfully invested approximately US\$900m of capital globally.

Alberta has been represented to fund investors as one of the main regions where NextEnergy Capital intends to deploy capital raised through this new investment vehicle.



The August 3<sup>rd</sup> announcement, which also follows on a recent major change in the AESO connection procedure, has unfortunately led us to question whether our assumption of Alberta's business-friendly environment still holds true, and this may have negative consequences in our decision to increase the company's investment appetite in the province.

#### Pause Implementation

Regarding the implementation of the approval pause, we find none of the proposed options acceptable or necessary for an orderly change in AUC policy. The Commission has in many instances in the past, amended policy and regulations without resorting to what amounts to an almost eight-month moratorium on development and investment (between August 3<sup>rd</sup> and March 31<sup>st</sup>, 2024). Expect developers and investors to significantly pull back on investment while the uncertainty of the moratorium exists.

We suggest that the Commission remove the pause and implement a well-defined and transparent process to implement any policy and regulatory changes, while maintaining constant consultation and communication with the industry and other stakeholders.

We would suggest that any renewable energy project with a current application proceeding with the AUC, as well as any project that submits a valid and deemed complete application before December 31<sup>st</sup>, 2023, be grandfathered under the current regulation. We also suggest that the Commission publish, at the earliest opportunity possible, draft changes to policy and regulations in order to signal the intentions of the AUC and allow industry the chance to adjust plans and schedules accordingly.

We should also highlight that, like many of our peers, Starlight's approach to development has always been to work collaboratively and in good faith with local municipalities and communities to jointly address any concerns with proposed renewable energy facilities. Starlight, and our local partners, continue to have positive and constructive dialogue with the municipalities that host our solar projects, and we actively adjust project designs based on the feedback that we receive from the local community.

#### Proposed Implementation Options

Alternatively, of the three approval pause implementation options presented, Starlight most supports "*approval hold only*". This is the most balanced and reasonable approach of the three options, as it maintains a degree of fairness for the applications already in the AUC process as well as allow future applicants the opportunity to take steps to maturing their projects by entering the AUC proceeding process prior to waiting until March of next year.

This option will also presumably allow the AUC time to provide the new applicants with Information Requests and allow interveners and observers the opportunity to participate in the proceeding at an earlier stage. Secondly, the "*approval hold only*" option would allow the AUC to identify the proceedings that require a hearing process so that immediately following the lifting of the approval pause, a hearing could proceed, rather than waiting only until after February 29<sup>th</sup> to begin the approval process and adding significantly to the duration of the permitting process. Thirdly, the "*approval hold only*" option will prevent what we expect could be a backlog of applications submitted to the AUC at one time following the removal of the pause on February 29<sup>th</sup>, 2024.

We also believe that continuing to keep the window open for AUC applications would be less harmful to Alberta's international reputation as a safe place to invest and do business than a complete application and approval freeze.

#### Inquiry Topics

In addition to feedback on the approval pause implementation options, we would also like to briefly comment on the five topics that the AUC has been directed to inquire into:

1. Considerations on development of power plants on specific types or classes of agricultural or environmental land. • We believe that to date, the Commission has taken a reasonable and balanced

approach to the review of environmental concerns pertaining to renewable energy development by ensuring that all applications include a Referral Letter from Alberta Environment and Protected Areas (AEPA). Developers submit extensive surveys, studies and data for review by AEPA prior to a Referral Letter being issued. The rigorousness of these reviews is consistent with similar processes found in other jurisdictions.

- In regard to development of solar on agricultural land, we would support policy that any project developed on prime farmland be required to include a comprehensive agricultural co-utilization plan. The NextEnergy Group has experience in Europe developing and operating projects that successfully implement agricultural co-utilization plans as well as being one of the very few players publicly supported by some of the largest farm associations in this regard. The solar industry in general is moving towards agri-voltaics, even absent regulatory requirements to do so.

2. Considerations of the impact of power plant development on Alberta's pristine views. • Qualitative considerations pertaining to development, such as visual impacts, are difficult to formalize into strict policy. Starlight would be in support of powerplant submission requirements to include an assessment of visual impacts, such as photo simulations from sensitive viewscape locations.

- We also would like to point out that solar facilities have several viable options to reduce visibility, including vegetative screening, berms, and fencing. Starlight is working with the University of Florence (Italy) in funding research aimed at identifying best practices to insert solar plants within the existing landscapes.

3. Considerations of implementing mandatory reclamation security requirements for power plants. • Most renewable energy real estate options and leases, including those held by Starlight, contain language obligating facility owners to decommission at the end of project life.

- We would be in support of a reasonable and formalized approach to reclamation security requirements for projects, provided these requirements are not duplicative or overly burdensome for industry, while at the same time protecting landowners and municipalities.

- It should be noted that renewable energy projects, unlike oil and gas, do not suffer from a depleting resource and we therefore believe that renewable energy facilities will potentially continue to operate well beyond the estimated project life, subject to agreement by the landowner and other stakeholders.

4. Considerations for development of power plants on lands held by the Crown in Right of Alberta. • Starlight would be in support of a fair and transparent process of leasing Crown Lands for the purposes of renewable energy development, provided there is robust consultation process with local Indigenous communities.

5. Considerations of the impact the increasing growth of renewables has to both generation supply mix and electricity system reliability. • Starlight is encouraged by the steps that the Alberta Electricity





System Operator is taking to implement energy storage into the AIES (both co-located and stand-alone), as is currently on-going in several other jurisdictions to ensure a safe and smooth inclusion of intermittent generator systems. Starlight has a considerable experience in developing, constructing and operating battery energy storage systems in Europe and intends to start developing this technology in Alberta in the coming months.

We appreciate the opportunity to provide feedback on this important matter. We believe that a transparent process can lead to well-informed policy changes without the need to implement a moratorium on approvals.

Starlight, as well as the other divisions of the NextEnergy Group, is fully available to engage into a constructive discussion with the Commission, bringing its more than 15 years of experience gained in the solar PV sector. Please feel free to contact us locally at 1-403-880-4939.

We would like to thank you for the attention and we look forward to participating in the next round of industry consultations.

Sincerely,

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I, XXXXXXXXXXX am a stakeholder in the Northern Valley area where a wind project is being proposed. It is my feeling that a "complete abeyance" be followed in order to properly review the entire regulatory process. Our legal representatives, Willms & Shier has explained our rationale which is attached to this email. My own request is that the reviewal be considered on the basis of human and animal health, and leave money out of the entire process.

Yours truly;

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# AUC

Alberta Utilities Commission

**Re: Six-Month Approvals Pause Feedback - Northern Valley Families Support a Complete Abeyance of Approvals for New Renewable Electricity Generation**

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Willms & Shier Environmental Lawyers LLP is environmental legal counsel to approximately 50 families in Northern Valley, Alberta. Our clients reside immediately adjacent to the Northern Valley Wind Project currently proposed by Elemental Energy.

We understand that the Alberta Utilities Commission (the "AUC") is seeking stakeholder feedback about its implementation of a six-month moratorium on approvals for new renewable electricity generation.

For the reasons outlined below, our clients respectfully submit that a six-month complete abeyance of approvals is appropriate during which time the AUC:

- 1 does not accept new applications,
- 2 places all existing excluded applications on hold, and
- 3 takes no further steps to complete their record or issue decisions.

**COMPLETE ABEYANCE OF APPROVALS NECESSARY FOR PROCESS RE-EVALUATION**

Our clients strongly support a review of the entire AUC approvals process. This includes addressing issues spanning from the signing of lease options before public consultation, to the lack of input from communities on Alberta Environment and Protected Area environmental reports, through to the AUC's mandate and its applicable test for granting approvals.

Given the ongoing re-evaluation of the entire AUC process, our clients' view is that a complete abeyance of approvals during the six-month moratorium is the most appropriate course of action.

The alternate options being considered by the AUC, including a partial abeyance or a hold on issuing approvals until after the moratorium, are not consistent with the purpose of the AUC process review. Under these options, if the public inquiry leads to changes in the AUC approvals process, existing applications would likely have to be resubmitted and reviewed again at significant time and financial expense to all parties involved. Similarly, existing projects in the pre-AUC application phase may be preparing materials based on a set of requirements that may change.

### **COMPLETE ABEYANCE REQUIRED FOR PROCEDURAL FAIRNESS**

Taking any approach other than a complete abeyance during the review process would, in our view, also breach the principles of procedural fairness and legitimate expectation.

The Supreme Court of Canada in *Baker v Canada (Minister of Citizenship & Immigration)* set out guiding principles as follows:<sup>1</sup>

... if a legitimate expectation is found to exist, this will affect the content of the duty of fairness owed to the individual or individuals affected by the decision. If the claimant has a legitimate expectation that a certain procedure will be followed, this procedure will be required by the duty of fairness: . . . . Nevertheless, the doctrine of legitimate expectations cannot lead to substantive rights outside the procedural domain. This doctrine, as applied in Canada, is based on the principle that the "circumstances" affecting procedural fairness take into account the promises or regular practices of administrative decision-makers, and that it will generally be unfair for them to act in contravention of representations as to procedure, or to backtrack on substantive promises without according significant procedural rights. [Emphasis added, portions of the quoted paragraph and citations omitted.]

*Schwarz Hospitality Group Ltd. v. Canada (Minister of Canadian Heritage)*<sup>2</sup> followed *Baker* and presents a cautionary take for administrative decision-makers in the midst of a moratorium.

In *Schwarz*, the Minister of Canadian Heritage imposed a one-year development moratorium for certain types of development in Banff National Park for the purpose of reviewing the guidelines applicable in the circumstances. Notwithstanding the moratorium, Officials at Parks Canada continued to consult with a developer about an existing development proposal.

This ongoing consultation – akin to the partial abeyance options being considered by the AUC – resulted in the developer successfully bringing a *mandamus* order against Parks Canada requiring Parks Canada to adjudicate on the developer's proposal in accordance with the original approval process and guidelines in place before the moratorium was implemented.

This outcome was entirely antithetical to the purpose of the moratorium.

### **CONCLUSION**

Our clients respectfully submit that a complete abeyance moratorium, rather than a partial one, is the best course of action to both:

- 1 permit all stakeholders and the AUC to start afresh under any revised AUC procedures, and
- 2 maintain consistency within the AUC's existing duty of procedural fairness.

Yours truly,

Dear AUC Members,

I am writing as a concerned Albertan resident in response to your stakeholder feedback request, dated August 3, 2023<sup>1</sup>. **I respectfully request that the AUC end the pause and immediately recommence approvals for renewable energy projects greater than 1MW.** I believe the decision to pause renewable projects of greater than 1MW<sup>2</sup> is unnecessary, will threaten thousands of jobs, will increase electricity costs for all ratepayers, will stifle billions of dollars in investment, and will slow efforts to address pollution! Alberta is the solar powerhouse of Canada, and we need to maintain our competitive edge.

I understand that you have a number of concerns you are seeking to address<sup>3</sup>:

- With respect to **land reclamation** concerns, please note that solar sites will remain viable well past the end of life of the original panels, and this will significantly reduce land reclamation needs. Additionally, The Government of Alberta already has reclamation [Guidelines for Renewable Energy Operations](#) which address this matter.
- With respect to **end of life** concerns for renewable energy infrastructure disposal, the Alberta Recycling Management Authority (ARMA) is already piloting reuse and recycle programs for solar PV. Given that the majority of solar being installed today will be in operation for well over 25 years, ARMA is really out ahead on this matter. Furthermore, modern solar panels (manufactured after 2000) have [datasheets](#) that indicate their guaranteed performance and degradation characteristics and they all come in **under 0.4% degradation per year**, which translates to **over 90% functionality after 25 years** and **over 67% functionality after 100 years!** That's why they comfortably have 25 year warranties that don't just guarantee function but performance too.
- With respect to **land use** concerns, such as food security, wetland preservation and wildlife conservation, Solar Alberta has already created highly relevant Solar Siting Recommendations: <https://solaralberta.ca/solar-siting-recommendations/>. I believe you could review and adopt protocols such as these without a pause on approvals.



If the Government of Alberta and the AUC are unwilling to immediately end the pause, I respectfully request that you continue to fully process new and existing excluded applications without issuing any approvals until after the pause period (Option 3 in your announcement).

Thank you for considering my request.

Sincerely,

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Dear AUC Members,

I am writing as a concerned Albertan resident in response to your stakeholder feedback request, dated August 3, 2023<sup>1</sup>. **I respectfully request that the AUC end the pause and immediately recommence approvals for renewable energy projects greater than 1MW.** I believe the decision to pause renewable projects of greater than 1MW<sup>2</sup> is unnecessary, will threaten thousands of jobs, will increase electricity costs for all ratepayers, will stifle billions of dollars in investment, and will slow efforts to address pollution! Alberta is the solar powerhouse of Canada, and we need to maintain our competitive edge.

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- With respect to **land use** concerns, such as food security, wetland preservation and wildlife conservation, Solar Alberta has already created highly relevant Solar Siting Recommendations: <https://solaralberta.ca/solar-siting-recommendations/>. I believe you could review and adopt protocols such as these without a pause on approvals.

If the Government of Alberta and the AUC are unwilling to immediately end the pause, I respectfully request that you continue to fully process new and existing excluded applications without issuing any approvals until after the pause period (Option 3 in your announcement).

Thank you for considering my request.

Sincerely,

---

Dear Alberta Utilities Commission (AUC),

I am writing to provide my input and perspective on the recent announcement by you, the Alberta Utilities Commission (AUC) regarding the temporary PAUSE on approvals for new renewable electricity generation projects. As a concerned stakeholder deeply invested in the future of our province's energy landscape and sustainability, I believe it is crucial to share my thoughts on this matter.

I commend the AUC for taking the initiative to seek feedback from stakeholders like myself regarding the implementation of the approval pause. It is clear that decisions of this magnitude have far-reaching implications, and engaging stakeholders in the process is a commendable approach.

After careful consideration of the options presented, **I am in favor of Option 1**, which involves a comprehensive review of the entire process. My rationale for supporting this option is rooted in the belief that the current approach necessitates a thorough re-evaluation. Several factors contribute to this viewpoint.

The concerns I have pertain to various aspects of the renewable energy approval process. These concerns range from the practice of signing lease options before



adequate public consultation, to the limitations placed on community input concerning AEPA environmental referral reports, and the stringent legal expert requirements imposed by the AUC. This combination of factors creates barriers that hinder meaningful public participation in a cost-effective manner.

Consequently, I firmly believe that a comprehensive review, conducted through a transparent and inclusive public inquiry, is essential to comprehensively address these issues.

Given the intricate nature of these challenges, I am apprehensive about the potential efficacy of continuing with the approval review process as outlined in Options 2 and 3. If the AUC were to proceed with accepting applications and conduct partial processes under the existing guidelines, it could signal a reluctance to make substantive changes. However, if substantial modifications are eventually introduced, re-evaluating all submitted applications would likely prove to be an inefficient allocation of time and resources for both applicants and the AUC.

Considering the aforementioned challenges and potential pitfalls, I firmly believe that the decision to pause the approval process is a prudent one. This temporary pause not only acknowledges the need for reform but also offers an opportunity for a comprehensive review that ensures all facets of the process are meticulously examined and improved upon.

In conclusion, **I stand in support of Option 1** due to the imperative need for a comprehensive review that effectively addresses the current shortcomings in the renewable energy approval process. The overarching objective should be the establishment of a transparent, participatory, and streamlined process that fosters meaningful stakeholder input and facilitates responsible renewable energy development within our province.

I extend my gratitude to you for considering my feedback on this pivotal matter. I applaud the AUC's commitment to cultivating a more sustainable energy future for Alberta, and I eagerly anticipate the positive transformations that will emerge as a result of this thorough review.

Thank you for your time and attention.

Sincerely,

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Dear Mr Mousseau,

My name is XXXXXXXXX and I own land in close proximity of the proposed Elemental Energy Northern Valley Wind Project. My home is located on SW-16-56-6-W4.

As a stakeholder, I request that a “complete abeyance” be enacted in order to properly review the renewable energy regulatory application process.

My legal representation Willms & Shier has explained the rationale which I attach to this letter.

Thank you for your consideration of this request. It is appreciated.

Respectfully submitted by

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**Re: Six-Month Approvals Pause Feedback - Northern Valley Families Support a Complete Abeyance of Approvals for New Renewable Electricity Generation**

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Willms & Shier Environmental Lawyers LLP is environmental legal counsel to approximately 50 families in Northern Valley, Alberta. Our clients reside immediately adjacent to the Northern Valley Wind Project currently proposed by Elemental Energy.

We understand that the Alberta Utilities Commission (the “AUC”) is seeking stakeholder feedback about its implementation of a six-month moratorium on approvals for new renewable electricity generation.

For the reasons outlined below, our clients respectfully submit that a six-month complete abeyance of approvals is appropriate during which time the AUC:

- 1 does not accept new applications,
- 2 places all existing excluded applications on hold, and
- 3 takes no further steps to complete their record or issue decisions.

**COMPLETE ABEYANCE OF APPROVALS NECESSARY FOR PROCESS RE-EVALUATION**

Our clients strongly support a review of the entire AUC approvals process. This includes addressing issues spanning from the signing of lease options before public consultation, to the lack of input from communities on Alberta Environment and Protected Area environmental reports, through to the AUC’s mandate and its applicable test for granting approvals.



Given the ongoing re-evaluation of the entire AUC process, our clients' view is that a complete abeyance of approvals during the six-month moratorium is the most appropriate course of action.

The alternate options being considered by the AUC, including a partial abeyance or a hold on issuing approvals until after the moratorium, are not consistent with the purpose of the AUC process review. Under these options, if the public inquiry leads to changes in the AUC approvals process, existing applications would likely have to be resubmitted and reviewed again at significant time and financial expense to all parties involved. Similarly, existing projects in the pre-AUC application phase may be preparing materials based on a set of requirements that may change.

### **COMPLETE ABEYANCE REQUIRED FOR PROCEDURAL FAIRNESS**

Taking any approach other than a complete abeyance during the review process would, in our view, also breach the principles of procedural fairness and legitimate expectation.

The Supreme Court of Canada in *Baker v Canada (Minister of Citizenship & Immigration)* set out guiding principles as follows:<sup>1</sup>

... if a legitimate expectation is found to exist, this will affect the content of the duty of fairness owed to the individual or individuals affected by the decision. If the claimant has a legitimate expectation that a certain procedure will be followed, this procedure will be required by the duty of fairness: . . . . Nevertheless, the doctrine of legitimate expectations cannot lead to substantive rights outside the procedural domain. This doctrine, as applied in Canada, is based on the principle that the "circumstances" affecting procedural fairness take into account the promises or regular practices of administrative decision-makers, and that it will generally be unfair for them to act in contravention of representations as to procedure, or to backtrack on substantive promises without according significant procedural rights. [Emphasis added, portions of the quoted paragraph and citations omitted.]

*Schwarz Hospitality Group Ltd. v. Canada (Minister of Canadian Heritage)*<sup>2</sup> followed *Baker* and presents a cautionary take for administrative decision-makers in the midst of a moratorium.

In *Schwarz*, the Minister of Canadian Heritage imposed a one-year development moratorium for certain types of development in Banff National Park for the purpose of reviewing the guidelines applicable in the circumstances. Notwithstanding the moratorium, Officials at Parks Canada continued to consult with a developer about an existing development proposal.

This ongoing consultation – akin to the partial abeyance options being considered by the AUC – resulted in the developer successfully bringing a *mandamus* order against Parks Canada requiring Parks Canada to adjudicate on the developer's proposal in accordance with the original approval process and guidelines in place before the moratorium was implemented.

This outcome was entirely antithetical to the purpose of the moratorium.

### **CONCLUSION**

Our clients respectfully submit that a complete abeyance moratorium, rather than a partial one, is the best course of action to both:

- 1 permit all stakeholders and the AUC to start afresh under any revised AUC procedures, and
- 2 maintain consistency within the AUC's existing duty of procedural fairness.

Yours truly,

Dear Alberta Utilities Commission,

I am writing to provide my input and perspective on the recent announcement by the Alberta Utilities Commission regarding the temporary pause on approvals for new renewable electricity generation projects. As a concerned stakeholder, I believe it is crucial to share my thoughts on this matter.

Firstly, I appreciate the AUC's initiative in seeking feedback from stakeholders regarding the implementation of the approval pause. It is evident that decisions of this nature have significant implications for our province's energy landscape and future sustainability.

In response to the options presented, I am in favor of **Option 1**, which involves a comprehensive review of the entire process. My rationale for supporting this option is rooted in the belief that the current approach necessitates a thorough re-evaluation. Several factors contribute to this viewpoint.

The concerns I have pertain to the entire renewable energy approval process, ranging from the signing of lease options prior to public consultation, to the limited input provided by communities on AEPA environmental referral reports, and the rigid legal expert requirements stipulated by the AUC. This combination of factors makes it challenging for the public to meaningfully participate in a cost-effective manner. Consequently, I believe that a comprehensive review, conducted through a public inquiry, is necessary to address these issues comprehensively.

Given the complexities and intricacies involved, I am apprehensive about the efficacy of continuing with the approval review process as outlined in Options 2 and 3. If the AUC proceeds with accepting applications and executes partial processes under the existing guidelines, it could imply that substantive changes are unlikely. However, if substantial modifications are eventually introduced, re-evaluating all submitted applications would be an inefficient utilization of time and resources for both applicants and the AUC.



In light of the aforementioned challenges and potential setbacks, I believe that the decision to pause the approval process is prudent. This temporary pause not only acknowledges the need for reform but also allows for a comprehensive review that ensures all aspects of the process are thoroughly examined and improved upon.

In conclusion, I support **Option 1** due to the necessity of a comprehensive review that addresses the current shortcomings in the renewable energy approval process. The ultimate goal should be to establish a more transparent, participatory, and efficient process that encourages meaningful stakeholder input and promotes responsible renewable energy development in our province.

Thank you for considering my feedback on this critical matter. I appreciate the AUC's dedication to fostering a more sustainable energy future for Alberta, and I look forward to witnessing the positive changes that will arise from this review.

Sincerely,

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Dear AUC Members,

I am writing as a concerned Albertan resident in response to your stakeholder feedback request, dated August 3, 2023<sup>1</sup>. **I respectfully request that the AUC end the pause and immediately recommence approvals for renewable energy projects greater than 1MW.** I believe the decision to pause renewable projects of greater than 1MW<sup>2</sup> is unnecessary, will threaten thousands of jobs, will increase electricity costs for all ratepayers, will stifle billions of dollars in investment, and will slow efforts to address climate change. Alberta is the solar powerhouse of Canada, and we need to maintain our competitive edge.

I understand that you have a number of concerns you are seeking to address<sup>3</sup>:

- With respect to **land reclamation** concerns, please note that solar sites will remain viable well past the end-of-life of the original panels, and this will significantly reduce land reclamation needs. Additionally, The Government of Alberta already has reclamation [Guidelines for Renewable Energy Operations](#) that address this matter.



- With respect to **end-of-life** concerns for renewable energy infrastructure disposal, the Alberta Recycling Management Authority (ARMA) is already piloting reuse and recycle programs for solar PV. Given that the majority of solar being installed today will be in operation for well over 25 years, ARMA is really out ahead on this matter.
- With respect to **land use** concerns, such as food security, wetland preservation and wildlife conservation, Solar Alberta has already created highly relevant Solar Siting Recommendations: <https://solaralberta.ca/solar-siting-recommendations/>. I believe you could review and adopt protocols such as these without a pause on approvals.

If the Government of Alberta and the AUC are unwilling to immediately end the pause, I respectfully request that you continue to fully process new and existing excluded applications without issuing any approvals until after the pause period (Option 3 in your announcement).

Thank you for considering my request.

Sincerely,

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**Re: Response to the Alberta Utilities Commission (the “AUC or the “Commission”)**  
**Bulletin dated August 3, 2023, AUC to launch inquiry, implement pause on**  
**approvals for new renewable electricity generation (the “ Bulletin ”)**  
**Stakeholder Feedback from the City of Edmonton (the “City”) on Non-Exempt**  
**Renewable Electricity Approvals under the [Generation Approvals Pause](#)**  
**[Regulation , Alta Reg 108/2023](#) (the “ [GAP Regulation](#) ”) established by Order In Council**  
**172/2023 (the “ [Order](#) ”)**

Thank you for this opportunity to provide stakeholder feedback in response to the Bulletin. The City’s future and current planning is connected to the Commission’s renewable electricity application decisions and a future regulatory framework for renewable electricity in Alberta. Renewable electricity is a significant part of the City of Edmonton’s efforts to become carbon neutral by 2050. Under section 619 of the [Municipal Government Act , RSA 2000, c M-26](#) (the “ [MGA](#) ”)

the terms and conditions of any licence, permit, approval or other authorization granted by the Commission prevail over the City’s statutory plans, land use bylaw, subdivision decisions or development decisions related to renewable electricity projects. Accordingly, the City of Edmonton is directly impacted by both the [GAP Regulation](#) and renewable energy policies generally. This City’s comments and feedback are outlined below.

**A. The City’s understanding of the Commission’s request for feedback**

The City’s comments and feedback are based on the following understanding:

1. Section 2 of the [GAP Regulation](#) instructs the Commission to “not grant an approval referred to in section 9 or 11 of the [Hydro and Electric Energy Act](#) in respect of a hydro development or power plant that produces renewable electricity” (the “ **Pause** ”).
2. Section 3 of the [GAP Regulation](#) instructs the Commission that there are express exemptions to the Pause (the “ **Exempt Applications** ”).
3. The Commission is **not** seeking stakeholder feedback on the processing of Exempt Applications.
4. The Commission will continue to process and approve or deny Exempt Applications in the normal course.
5. For any renewable electricity application that is **not** an Exempt Application, the Commission seeks stakeholder feedback on how to apply the Pause prescribed by the [GAP Regulation](#) .

6. In the Bulletin, the Commission identifies three possible options for applying the Pause:

(a) **Complete abeyance:** The AUC does not accept new applications during the pause period and all existing excluded applications will be placed in abeyance during the pause period with the AUC taking no further steps to complete their record or issue decisions.

(b) **Partial abeyance:** The AUC does not accept new applications during the pause period. For all existing applications with an incomplete record, the AUC process will proceed to the point where the written evidence is complete, applications will then be placed in abeyance until the pause period expires. The AUC will not hold any public hearings for these applications during the pause period. Existing applications with a complete record will be placed in abeyance until the pause period expires.

(c) **Approval hold only:** The AUC continues to fully process new and existing excluded applications without issuing any approvals until after the pause period.

7. The use of “excluded applications” in the above-referenced abeyance options is **not** intended to apply to the Exempt Applications. Instead, “excluded applications” applies to new and existing renewable electricity applications to the Commission that are not Exempt Applications.

8. The City and other stakeholders may identify a preference for one of the above options or propose something else.

#### **B. The City prefers the Approval Hold Only Option**

The City’s comments are limited to the selection of an abeyance option. The City understands that the Commission is required by law under the *GAP Regulation*, the [Alberta Utilities Commission Act](#), [SA 2007, c A-37.2](#) and the Order, to implement the Pause. The City reserves all rights to make further submissions before the Commission, or any other court or tribunal having jurisdiction. The City does not provide comment on the law in the following submission to the Commission.

The Pause on renewable electricity approvals should be reduced as much as possible. The City has a

target of becoming a carbon neutral community by 2050. This target relies on renewable and resilient energy transition and increased electrification in different sectors such as buildings and vehicles. The City’s approach relies on Alberta transitioning to a carbon neutral electricity grid. This transition requires an increase in renewable energy sources supplying the grid. ***A long term pause in investment in renewable energy projects in Alberta could delay this transition.*** If the electricity

grid in Alberta remains primarily powered by fossil fuels this will impede the City’s emission reduction efforts. Therefore, it is critical that the Commission resolve this approval abeyance, and facilitate any future inquiry, in a timely manner without unnecessary delays or time extensions.

If selected by the Commission, the “Approval Hold Only” option would enable the Commission to process **new and existing** renewable electricity applications that are subject to the Pause. The City believes that this Approval Hold Only process would:

(a) allow applicants and proponents of **new and existing** applications to advance their projects through a regulatory process; and

(b) provide a timely right to be heard for applicants and proponents of **new and existing** applications and interested persons/interveners accepted by the Commission.

The Commission should clarify if new and existing applications, that are subject to the Pause, may be subject to new regulatory requirements stemming from the future inquiry for renewable electricity applications and require further evidence submissions or proceedings for those applications.

Sincerely,

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Dear AUC Members,



I am writing as a concerned Albertan resident in response to your stakeholder feedback request, dated August 3, 2023<sup>1</sup>. **I respectfully request that the AUC end the pause and immediately recommence approvals for renewable energy projects greater than 1MW.** I believe the decision to pause renewable projects of greater than 1MW<sup>2</sup> is unnecessary, will threaten thousands of jobs, will increase electricity costs for all ratepayers, will stifle billions of dollars in investment, and will slow efforts to address climate change. Alberta is the solar powerhouse of Canada, and we need to maintain our competitive edge.

I understand that you have a number of concerns you are seeking to address<sup>3</sup>:

- With respect to **land reclamation** concerns, please note that solar sites will remain viable well past the end of life of the original panels, and this will significantly reduce land reclamation needs. Additionally, The Government of Alberta already has reclamation [Guidelines for Renewable Energy Operations](#) which address this matter.
- With respect to **end of life** concerns for renewable energy infrastructure disposal, the Alberta Recycling Management Authority (ARMA) is already piloting reuse and recycle programs for solar PV. Given that the majority of solar being installed today will be in operation for well over 25 years, ARMA is really out ahead on this matter.
- With respect to **land use** concerns, such as food security, wetland preservation and wildlife conservation, Solar Alberta has already created highly relevant Solar Siting Recommendations: <https://solaralberta.ca/solar-siting-recommendations/>. I believe you could review and adopt protocols such as these without a pause on approvals.

If the Government of Alberta and the AUC are unwilling to immediately end the pause, I respectfully request that you continue to fully process new and existing excluded applications without issuing any approvals until after the pause period (Option 3 in your announcement).

Thank you for considering my request.

I must add that I am involved in education in the solar industry, and that I am a proud owner of a micro-Gen PV solar system.

Sincerely,

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Dear AUC Members,

I am writing as a concerned Albertan resident in response to your stakeholder feedback request, dated August 3, 2023<sup>1</sup>. **I respectfully request that the AUC end the pause and immediately recommence approvals for renewable energy projects greater than 1MW.** I believe the decision to pause renewable projects of greater than 1MW<sup>2</sup> is unnecessary, will threaten thousands of jobs, will increase electricity costs for all ratepayers, will stifle billions of dollars in



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If the Government of Alberta and the AUC are unwilling to immediately end the pause, I respectfully request that you continue to fully process new and existing excluded applications without issuing any approvals until after the pause period (Option 3 in your announcement).

Thank you for considering my request.

Sincerely,

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Dear Commissioners,

RES has been invited to share feedback on the AUC's announcement on August 3, 2023, of an inquiry and pause on approvals for new renewable electricity generation. During this moratorium, the AUC will examine a host of issues brought forward by its Commissioners and government.

Although we welcome a wider discussion on perceived issues in our sector, RES firmly believes that this moratorium will cause greater harm than it is intended to prevent. The discussion on various policy issues could have just as easily happened without a moratorium, in the same way that Rule 007 and its various amendments have been developed, in consultation and partnership with industry and key stakeholders, or as any other policy review is reviewed in Alberta, or any other province of Canada.

As discussed below, any of the AUC's proposed options for this moratorium will result in landowners losing control of their property rights and reducing their ability to diversify their income. This decision will starve local municipalities of new jobs, tax revenue, and other long-term social and environmental investments. Renewable energy projects have supported municipalities across Alberta for several decades with few long-term consequences, and many of the concerns listed in the inquiry are already being managed at an appropriate level through existing regulations. The moratorium will result in severe uncertainty among investors, jeopardizing billions of dollars of investment in Alberta. All the options below will create significant negative outcomes, as a total moratorium on approvals with no warning or discussion with stakeholders causes disruption to in-flight projects worth billions of dollars. All options will derail the Alberta Electric System Operator (AESO) first cluster study,



scheduled this autumn, designed to evaluate and manage changes to the province's interconnection process. They will cause significant backlog of projects that will seek approvals once the moratorium is lifted, and will also defer investment in further project development, while increasing the cost of capital once the market reopens.

With regards to the various options, we provide the following observations:

1. **Complete abeyance:** The AUC does not accept new applications during the pause period and all existing excluded applications will be placed in abeyance during the pause period with the AUC taking no further steps to complete their record or issue decisions.

a. This option will create a significant backlog of projects once the AUC approvals process resumes, and will have cascading effects on the AESO, the Alberta Environment and Protected Areas, and the network of suppliers and contractors supporting renewable energy projects across the province as developers seek to fulfil their commitments within Power Purchase Agreements and meet other project timelines. The AUC will need a process to manage this influx of project applications.

b. Developers align their renewable energy projects with the current AUC process, and an AESO interconnection process that has strict timelines and requirements for delivery, and a complete abeyance will significantly impact projects' ability to adhere to these requirements. Complete abeyance will also increase workload on the AESO.

c. Complete abeyance and associated project delays will result in enormous negative impacts to those projects in advanced stages of development, with millions of dollars' worth of equipment ordered and connection costs committed based on regular AUC timing, as well as the opportunity cost of lost tax revenues. The economic impact of the moratorium will be in the billions of dollars.

d. Complete abeyance will have cascading project delays given the short warm-weather construction season in Alberta, pushing many projects back a full 12 months. Many projects have agreed offtake agreements with corporate consumers, and a year delay will expose fixed power pricing to 12 months of further inflation on capital costs and interest rates.

2. **Partial abeyance:** The AUC does not accept new applications during the pause period. For all existing applications with an incomplete record, the AUC process will proceed to the point where the written evidence is complete, applications will then be placed in abeyance until the pause period expires. The AUC will not hold any public hearings for these applications during the pause period. Existing applications with a complete record will be placed in abeyance until the pause period expires.

a. Progressing applications to the point of written completion will assist the AUC, industry, and other stakeholders in partially advancing projects and potentially reduce backlog of projects.

b. This option raises some significant questions and concerns related to any changes made because of this moratorium and review process. How will changes in regulations be considered, will projects that advance to a state of written completion be subject to new rules or grandfathered in under current regulations?

c. The regulatory regime would have to be very clear for projects that advance to hearings that consider topics listed in the review in this partial abeyance process.

d. Partial abeyance will also have cascading project delays given the short warm-weather construction season in Alberta, pushing many advanced projects back a full 12 months. Many projects have agreed offtake agreements with corporate consumers, and a year delay will expose fixed power pricing to 12 months of further inflation on capital costs and interest rates.

3. **Approval hold only:** The AUC continues to fully process new and existing excluded applications without issuing any approvals until after the pause period.

a. This option would be least damaging to projects and ensure project schedules and workloads throughout the industry would be managed as effectively as possible.

b. For this option to be effective, projects submitted and reviewed in the review period must not be subject to any new rules and this must be guaranteed ahead of time, in short





be grandfathered with any new regulations which may be developed during the moratorium period.

c. If there is a chance projects may be subject to new regulations, development will stop while there is uncertainty.

#### 4. Other options

a. For other reviews of this magnitude, the Alberta Government has allowed the current regulatory process to continue while changes are discussed and implemented.

b. RES believes that an approach that seeks to address the concerns of the inquiry while allowing the current, effective approval process to proceed would allow the government and the AUC to meet their objectives while allowing industry to manage and effectively transition their projects to a new regime.

RES and the renewable energy industry would strongly expect the opportunity to engage thoroughly in the AUC's evaluation of various policy amendments during the moratorium period. We would rightfully expect the AUC to demonstrate complete visibility and transparency towards the electricity generation sector into its reflections on draft policy development and allow our sector to engage thoughtfully and usefully towards any new regulations or operational requirements. For instance, will the AUC engagement going forward involve open policy development sessions, draft documents available for markup by these key stakeholders, and review of final policy suggestions? It will be important to present a clear plan to engage outside of the government circuit, because whatever is decided could impact many companies' investments and the future of renewable energy in Alberta for decades to come. There are credible pathways to a safe, reliable, and affordable Net Zero energy grid by 2035, if the proper supporting 'ecosystem' is in place.

Further to this point, RES would like to better understand the AUC's position with respect to the role of municipal governments in regulating renewable energy development. RES has always had positive relationships with the municipalities in which it has worked and given that municipal permitting processes often closely follow AUC direction, municipalities' ability to encourage projects that support their economic, social, and environmental interests may be at odds with the constraints posed by this moratorium.

The announcement also states that "The AUC has been directed to inquire into and report on [...] Considerations for development of power plants on lands held by the Crown in Right of Alberta." RES is encouraged by this consideration of opening Crown lands for renewable power plants. That said, we would ask how the AUC would define how it intends to open lands held by the Crown for the development of power plants and speak to which policies from other provinces it will review to inform this policy. Many developers, including RES, have secured and build renewable facilities on Crown land in other provinces (Quebec, Ontario, British Columbia, New Brunswick), and there is a wealth of industry experience the AUC can tap into. Additionally, many developers will wish to have clarity on preferred practices for Indigenous consultation for any prospective Crown land dispositions, and which government entity would retain the duty to consult upon land dispositions. As mentioned, RES has significant experience with development on Crown land in several Canadian provinces and various means of realizing authentic and mutually beneficially Indigenous partnerships; as such, we would be delighted to support the development of such a directive.

Thank you for the opportunity to provide feedback on the development of the approach to your inquiry.

Sincerely,

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# AUC

Alberta Utilities Commission

**Re: Six-Month Approvals Pause Feedback - Northern Valley Families Support a Complete Abeyance of Approvals for New Renewable Electricity Generation**

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Given the ongoing re-evaluation of the entire AUC process, our clients' view is that a complete abeyance of approvals during the six-month moratorium is the most appropriate course of action.

The alternate options being considered by the AUC, including a partial abeyance or a hold on issuing approvals until after the moratorium, are not consistent with the purpose of the AUC process review. Under these options, if the public inquiry leads to changes in the AUC approvals process, existing applications would likely have to be resubmitted and reviewed again at significant time and financial expense to all parties involved. Similarly, existing projects in the pre-AUC application phase may be preparing materials based on a set of requirements that may change.

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The Supreme Court of Canada in *Baker v Canada (Minister of Citizenship & Immigration)* set out guiding principles as follows:<sup>1</sup>

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This ongoing consultation – akin to the partial abeyance options being considered by the AUC – resulted in the developer successfully bringing a *mandamus* order against Parks Canada requiring Parks Canada to adjudicate on the developer's proposal in accordance with the original approval process and guidelines in place before the moratorium was implemented.

This outcome was entirely antithetical to the purpose of the moratorium.

### **CONCLUSION**

Our clients respectfully submit that a complete abeyance moratorium, rather than a partial one, is the best course of action to both:

- 1 permit all stakeholders and the AUC to start afresh under any revised AUC procedures, and
- 2 maintain consistency within the AUC's existing duty of procedural fairness.

Yours truly,

Dear AUC Members,

I am writing as a concerned Albertan resident in response to your stakeholder feedback request, dated August 3, 2023<sup>1</sup>. **I respectfully request that the AUC end the pause and immediately recommence approvals for renewable energy projects greater than 1MW.** I believe the decision to pause renewable projects of greater than 1MW<sup>2</sup> is unnecessary, will threaten thousands of jobs, will increase electricity costs for all ratepayers, will stifle billions of dollars in investment, and will slow efforts to address climate change. Alberta is the solar powerhouse of Canada, and we need to maintain our competitive edge.

I understand that you have a number of concerns you are seeking to address<sup>3</sup>:

- With respect to **land reclamation** concerns, please note that solar sites will remain viable well past the end-of-life of the original panels, and this will significantly reduce land reclamation needs. Additionally, The Government of Alberta already has reclamation [Guidelines for Renewable Energy Operations](#) that address this matter.
- With respect to **end-of-life** concerns for renewable energy infrastructure disposal, the Alberta Recycling Management Authority (ARMA) is already piloting reuse and recycle programs for solar PV. Given that the majority of solar being installed today will be in operation for well over 25 years, ARMA is really out ahead on this matter.
- With respect to **land use** concerns, such as food security, wetland preservation and wildlife conservation, Solar Alberta has already created highly relevant Solar Siting Recommendations: <https://solaralberta.ca/solar-siting-recommendations/>. I believe you could review and adopt protocols such as these without a pause on approvals.

If the Government of Alberta and the AUC are unwilling to immediately end the pause, I respectfully request that you continue to fully process new and existing excluded applications without issuing any approvals until after the pause period (Option 3 in your announcement).

Thank you for considering my request.

---

Dear AUC Members,

I am writing as a concerned life long Albertan in response to your stakeholder feedback request. I respectfully request that the AUC end the pause and immediately commence approvals for renewable energy projects greater than 1MW. I believe the decision to pause these projects is completely unnecessary.

I understand there may be concerns about large solar or wind farms, I believe all concerns can be addressed while the industry moves forward. Land reclamation, end of life and land use concerns are all being addressed by various areas of the solar industry and by government. That work can continue



without pausing project approvals. There are very similar concerns within the oil and gas industry all being addressed while the industry continues to move forward.

Renewable energy development is critical to our province. A moratorium is unprecedented in any other industry. I believe the Alberta government should make expanding and supporting renewable energy development a priority. It should strive to make Alberta a leader in this industry. Doing so would encourage investment in our province. I believe this pause can damage investment interest as Alberta can be seen as an unfriendly or risky province to invest in. I believe this pause can cause a loss of investment opportunity in our province and a resulting loss of Alberta jobs, both in the industry and in supporting businesses.

Thank you for considering my feedback.

Respectfully,

---

Hello,

There is no need to pause approvals. The regulatory uncertainty will move billions of dollars of investment away from Alberta.

Improving a process can run parallel.

How many fires and floods will it take before we approach energy policy in a way that demonstrates a serious approach to climate change?

Sincerely,

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**Our names are XXXXXXXXX and I am a stakeholder in the Northern Valley where a wind project is being proposed. I would like to make known, as a stakeholder, that it is necessary that a “complete abeyance” be enacted in order to properly review the entire regulatory application process. My legal representation, Willms & Shier, has explained our rationale, which I have attached to this email.**

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Yours truly,

Hello, my name is XXXXXXXXX and I am a born and raised Albertan. I strongly condemn the moratorium on renewable electrical energy production. I believe that the AUC has the ability to continue to approve applications while considering the future of renewable electrical generation in Alberta. I do not believe in complete abeyance or partial advance or approval hold only. I would propose that the Alberta utilities commission continue to allow the development of new, renewable electricity generation in Alberta. I am not an expert, I am a nurse, however, all the news I have read from municipal provincial, national and international news have found Alberta's moratorium on green energy troubling. This province is bringing uncertainty to companies that are investing money in Alberta and providing good paying jobs for Albertans.

Alberta's history of oil and gas has made it abundantly clear to me that Alberta must have clear guidelines for green energy. Two examples of how oil and gas has negatively impacted Alberta are the tailings ponds leaking and orphan wells. I would argue that the Alberta government didn't put a hold on new oil and gas after these two major issues negatively impacted the environment.

With energy price is skyrocketing we need more green energy in this province with the applicable back up generation of energy from natural gas during downtime.

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Dear Alberta Utilities Commission (AUC),

I am writing to provide my input and perspective on the recent announcement by you, the Alberta Utilities Commission (AUC) regarding the temporary PAUSE on approvals for new renewable electricity generation projects. As a concerned stakeholder deeply invested in the future of our province's energy landscape and sustainability, I believe it is crucial to share my thoughts on this matter.

I commend the AUC for taking the initiative to seek feedback from stakeholders like myself regarding the implementation of the approval pause. It is clear that decisions of this magnitude have far-reaching implications, and engaging stakeholders in the process is a commendable approach.

After careful consideration of the options presented, **I am in favor of Option 1**, which involves a comprehensive review of the entire process. My rationale for supporting this option is rooted in the belief that the current approach necessitates a thorough re-evaluation. Several factors contribute to this viewpoint.

The concerns I have pertain to various aspects of the renewable energy approval process. These concerns range from the practice of signing lease options before adequate public consultation, to the limitations placed on community input concerning AEPA environmental referral reports, and the stringent legal expert requirements imposed by the AUC. This combination of factors creates barriers that hinder meaningful public participation in a cost-effective manner. Consequently, I firmly believe that a comprehensive review, conducted through a transparent and inclusive public inquiry, is essential to comprehensively address these issues.



Given the intricate nature of these challenges, I am apprehensive about the potential efficacy of continuing with the approval review process as outlined in Options 2 and 3. If the AUC were to proceed with accepting applications and conduct partial processes under the existing guidelines, it could signal a reluctance to make substantive changes. However, if substantial modifications are eventually introduced, re-evaluating all submitted applications would likely prove to be an inefficient allocation of time and resources for both applicants and the AUC.

Considering the aforementioned challenges and potential pitfalls, I firmly believe that the decision to pause the approval process is a prudent one. This temporary pause not only acknowledges the need for reform but also offers an opportunity for a comprehensive review that ensures all facets of the process are meticulously examined and improved upon.

In conclusion, **I stand in support of Option 1** due to the imperative need for a comprehensive review that effectively addresses the current shortcomings in the renewable energy approval process. The overarching objective should be the establishment of a transparent, participatory, and streamlined process that fosters meaningful stakeholder input and facilitates responsible renewable energy development within our province.

I extend my gratitude to you for considering my feedback on this pivotal matter. I applaud the AUC's commitment to cultivating a more sustainable energy future for Alberta, and I eagerly anticipate the positive transformations that will emerge as a result of this thorough review.

Thank you for your time and attention.

Sincerely,

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Alberta Utilities commission,

We, XXXXXXXXXXX, own a farm site, crop land and pastures in the vicinity of the proposed Northern Valley wind project.

As stakeholders, we want it to be known that it is necessary to enact a complete abeyance of its approval to allow for a thorough and proper review of the entire regulatory application process.

We want it to be known that, as a stakeholder, it is necessary that a "complete abeyance" be enacted in order to properly review the entire regulatory application process. The environmental and long term impacts on our lands and on wildlife is of great concern.

My legal representation, Willms & Shier, has explained our rationale, which I have attached to this email.

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Willms & Shier Environmental Lawyers LLP is environmental legal counsel to approximately 50 families in Northern Valley, Alberta. Our clients reside immediately adjacent to the Northern Valley Wind Project currently proposed by Elemental Energy.

We understand that the Alberta Utilities Commission (the “AUC”) is seeking stakeholder feedback about its implementation of a six-month moratorium on approvals for new renewable electricity generation.

For the reasons outlined below, our clients respectfully submit that a six-month complete abeyance of approvals is appropriate during which time the AUC:

- 1 does not accept new applications,
- 2 places all existing excluded applications on hold, and
- 3 takes no further steps to complete their record or issue decisions.

**COMPLETE ABEYANCE OF APPROVALS NECESSARY FOR PROCESS RE-EVALUATION**

Our clients strongly support a review of the entire AUC approvals process. This includes addressing issues spanning from the signing of lease options before public consultation, to the lack of input from communities on Alberta Environment and Protected Area environmental reports, through to the AUC’s mandate and its applicable test for granting approvals.



Given the ongoing re-evaluation of the entire AUC process, our clients' view is that a complete abeyance of approvals during the six-month moratorium is the most appropriate course of action.

The alternate options being considered by the AUC, including a partial abeyance or a hold on issuing approvals until after the moratorium, are not consistent with the purpose of the AUC process review. Under these options, if the public inquiry leads to changes in the AUC approvals process, existing applications would likely have to be resubmitted and reviewed again at significant time and financial expense to all parties involved. Similarly, existing projects in the pre-AUC application phase may be preparing materials based on a set of requirements that may change.

### **COMPLETE ABEYANCE REQUIRED FOR PROCEDURAL FAIRNESS**

Taking any approach other than a complete abeyance during the review process would, in our view, also breach the principles of procedural fairness and legitimate expectation.

The Supreme Court of Canada in *Baker v Canada (Minister of Citizenship & Immigration)* set out guiding principles as follows:<sup>1</sup>

... if a legitimate expectation is found to exist, this will affect the content of the duty of fairness owed to the individual or individuals affected by the decision. If the claimant has a legitimate expectation that a certain procedure will be followed, this procedure will be required by the duty of fairness: . . . . Nevertheless, the doctrine of legitimate expectations cannot lead to substantive rights outside the procedural domain. This doctrine, as applied in Canada, is based on the principle that the "circumstances" affecting procedural fairness take into account the promises or regular practices of administrative decision-makers, and that it will generally be unfair for them to act in contravention of representations as to procedure, or to backtrack on substantive promises without according significant procedural rights. [Emphasis added, portions of the quoted paragraph and citations omitted.]

*Schwarz Hospitality Group Ltd. v. Canada (Minister of Canadian Heritage)*<sup>2</sup> followed *Baker* and presents a cautionary take for administrative decision-makers in the midst of a moratorium.

In *Schwarz*, the Minister of Canadian Heritage imposed a one-year development moratorium for certain types of development in Banff National Park for the purpose of reviewing the guidelines applicable in the circumstances. Notwithstanding the moratorium, Officials at Parks Canada continued to consult with a developer about an existing development proposal.

This ongoing consultation – akin to the partial abeyance options being considered by the AUC – resulted in the developer successfully bringing a *mandamus* order against Parks Canada requiring Parks Canada to adjudicate on the developer's proposal in accordance with the original approval process and guidelines in place before the moratorium was implemented.

This outcome was entirely antithetical to the purpose of the moratorium.

### **CONCLUSION**

Our clients respectfully submit that a complete abeyance moratorium, rather than a partial one, is the best course of action to both:

- 1 permit all stakeholders and the AUC to start afresh under any revised AUC procedures, and
- 2 maintain consistency within the AUC's existing duty of procedural fairness.

Yours truly,

Dear Alberta Utilities Commission (AUC),

I am writing to provide my input and perspective on the recent announcement by you, the Alberta Utilities Commission (AUC) regarding the temporary PAUSE on approvals for new renewable electricity generation projects. As a concerned stakeholder deeply invested in the future of our province's energy landscape and sustainability, I believe it is crucial to share my thoughts on this matter.

I commend the AUC for taking the initiative to seek feedback from stakeholders like myself regarding the implementation of the approval pause. It is clear that decisions of this magnitude have far-reaching implications, and engaging stakeholders in the process is a commendable approach.

After careful consideration of the options presented, **I am in favor of Option 1**, which involves a comprehensive review of the entire process. My rationale for supporting this option is rooted in the belief that the current approach necessitates a thorough re-evaluation. Several factors contribute to this viewpoint.

The concerns I have pertain to various aspects of the renewable energy approval process. These concerns range from the practice of signing lease options before adequate public consultation, to the limitations placed on community input concerning AEPA environmental referral reports, and the stringent legal expert requirements imposed by the AUC. This combination of factors creates barriers that hinder meaningful public participation in a cost-effective manner. Consequently, I firmly believe that a comprehensive review, conducted through a transparent and inclusive public inquiry, is essential to comprehensively address these issues.

Given the intricate nature of these challenges, I am apprehensive about the potential efficacy of continuing with the approval review process as outlined in Options 2 and 3. If the AUC were to proceed with accepting applications and conduct partial processes under the existing guidelines, it could signal a reluctance to make substantive changes. However, if substantial modifications are eventually introduced, re-evaluating all submitted applications would likely prove



to be an inefficient allocation of time and resources for both applicants and the AUC.

Considering the aforementioned challenges and potential pitfalls, I firmly believe that the decision to pause the approval process is a prudent one. This temporary pause not only acknowledges the need for reform but also offers an opportunity for a comprehensive review that ensures all facets of the process are meticulously examined and improved upon.

In conclusion, **I stand in support of Option 1** due to the imperative need for a comprehensive review that effectively addresses the current shortcomings in the renewable energy approval process. The overarching objective should be the establishment of a transparent, participatory, and streamlined process that fosters meaningful stakeholder input and facilitates responsible renewable energy development within our province.

I extend my gratitude to you for considering my feedback on this pivotal matter. I applaud the AUC's commitment to cultivating a more sustainable energy future for Alberta, and I eagerly anticipate the positive transformations that will emerge as a result of this thorough review.

Thank you for your time and attention.

Sincerely,

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Dear Alberta Utilities Commission,

I am writing to provide my input and perspective on the recent announcement by the Alberta Utilities Commission regarding the temporary pause on approvals for new renewable electricity generation projects. As a concerned stakeholder, I believe it is crucial to share my thoughts on this matter.

Firstly, I appreciate the AUC's initiative in seeking feedback from stakeholders regarding the implementation of the approval pause. It is evident that decisions of this nature have significant implications for our province's energy landscape and future sustainability.

In response to the options presented, I am in favor of **Option 1**, which involves a comprehensive review of the entire process. My rationale for supporting this option is rooted in the belief that the current approach necessitates a thorough re-evaluation. Several factors contribute to this viewpoint.

The concerns I have pertain to the entire renewable energy approval process, ranging from the signing of lease options prior to public consultation, to the limited input provided by communities on AEPA environmental referral reports, and the rigid legal expert requirements stipulated by the AUC. This combination of factors makes it challenging for the public to meaningfully participate in a cost-effective manner. Consequently, I believe that a comprehensive review, conducted through a public inquiry, is necessary to address these issues comprehensively.

Given the complexities and intricacies involved, I am apprehensive about the efficacy of continuing with the approval review process as outlined in Options 2 and 3. If the AUC proceeds with accepting applications and executes partial processes under the existing guidelines, it could imply that substantive changes are unlikely. However, if substantial modifications are eventually introduced, re-evaluating all submitted applications would be an inefficient utilization of time and resources for both applicants and the AUC.

In light of the aforementioned challenges and potential setbacks, I believe that the decision to pause the approval process is prudent. This temporary pause not only acknowledges the need for reform but also allows for a comprehensive review that ensures all aspects of the process are thoroughly examined and improved upon.

In conclusion, I support **Option 1** due to the necessity of a comprehensive review that addresses the current shortcomings in the renewable energy approval process. The ultimate goal should be to establish a more transparent, participatory, and efficient process that encourages meaningful stakeholder input and promotes responsible renewable energy development in our province.



Thank you for considering my feedback on this critical matter. I appreciate the AUC's dedication to fostering a more sustainable energy future for Alberta, and I look forward to witnessing the positive changes that will arise from this review.

Sincerely,

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Dear AUC Members,

I am writing as a concerned Albertan resident in response to your stakeholder feedback request, dated [August 3, 2023](#). **I respectfully request that the AUC end the pause and immediately recommence approvals for renewable energy projects greater than 1MW.** I believe the decision to pause renewable projects of greater than 1MW is unnecessary, will threaten thousands of jobs, will increase electricity costs for all ratepayers, will stifle billions of dollars in investment, and will slow efforts to address pollution! Alberta is the solar powerhouse of Canada, and we need to maintain our competitive edge.

I understand that you have a number of concerns you are seeking to address:

- With respect to **land reclamation** concerns, please note that solar sites will remain viable well past the end of life of the original panels, and this will significantly reduce land reclamation needs. Additionally, The Government of Alberta already has reclamation [Guidelines for Renewable Energy Operations](#) which address this matter.
- With respect to **end of life** concerns for renewable energy infrastructure disposal, the Alberta Recycling Management Authority (ARMA) is already piloting reuse and recycle programs for solar PV. Given that the majority of solar being installed [today](#) will be in operation for well over 25 years, ARMA is really out ahead on this matter. Furthermore, modern solar panels (manufactured after 2000) have [datasheets](#) that indicate their guaranteed performance and degradation characteristics and they all come in **under 0.4% degradation per year**, which translates to **over 90% functionality after 25 years** and **over 67% functionality after 100 years!** That's why they comfortably have 25 year warranties that don't just guarantee function but performance too.
- With respect to **land use** concerns, such as food security, wetland preservation and wildlife conservation, Solar Alberta has already created highly relevant Solar Siting Recommendations: [solaralberta.ca/solar-siting-recommendations/](http://solaralberta.ca/solar-siting-recommendations/). I believe you could review and adopt protocols such as these without a pause on approvals.



If the Government of Alberta and the AUC are unwilling to immediately end the pause, I respectfully request that you continue to fully process new and existing excluded applications without issuing any approvals until after the pause period (Option 3 in your announcement).

Thank you for considering my request.

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If the Government of Alberta and the AUC are unwilling to immediately end the pause, I respectfully request that you continue to fully process new and existing excluded applications without issuing any approvals until after the pause period (Option 3 in your announcement).

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thousands of jobs, will increase electricity costs for all ratepayers, will stifle billions of dollars in investment, and will slow efforts to address climate change. Alberta is the solar powerhouse of Canada, and we need to maintain our competitive edge.

I also believe it is vital that we take effective action at this time to transition away from fossil fuels. Wind and Solar power are reasonable and profitable alternatives in Alberta and I fully support their development.

I understand that you have a number of concerns you are seeking to address<sup>3</sup>:

- With respect to **land reclamation** concerns, please note that solar sites will remain viable well past the end of life of the original panels, and this will significantly reduce land reclamation needs. Additionally, The Government of Alberta already has reclamation [Guidelines for Renewable Energy Operations](#) which address this matter.
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If the Government of Alberta and the AUC are unwilling to immediately end the pause, I respectfully request that you continue to fully process new and existing excluded applications without issuing any approvals until after the pause period (Option 3 in your announcement).

Thank you for considering my request.

Sincerely,

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To the AUC:

To whom it may concern,

First a brief introduction. My name is XXXXXXXXXX from XXXXXXXX, Alberta. I reside on the still family farm homesteaded in 1910. My grandfather sailed the Atlantic to arrive in Canada to begin a new life of farming on the prairies. He started with nothing. Virgin prairie as far as you could see. My dad embraced progress in agriculture and learning. He was one of the few at the time to get on a train and take his high school at Camrose Lutheran College in the early 1940's. He passed away a couple of years ago.





Initially when we were first approached about a wind project with now defunct Sequoia Energy some 10-15 years ago we were curious. We were receptive to doing studies of the wind and the company at the time constructed two met towers for these wind studies. After the 7 years passed the company dismantled the one tower but seemed to forget about the other.

One spring day the wind and floating ice demolished the tower and there it lay pipes, cables and anchors laying beside and in the slough. A perfect storm of several years of record snow and runoff alongside record summer rainfall kept this tower laying in 6 feet of water from being cleaned up. At the time the company wanted to remediate the site but until the slough dried up it simply couldn't happen.

So there it was for about 5 years. Waiting for the water to disappear. This is where the company forgot. Purely by chance one summer I drove by a wind project under construction in Saskatchewan. Once home I googled the company and found a contact who I emailed. To our disbelief, I had touched base with someone who was aware of our towers and thought they were cleaned up. To my relief, the fellow had the site cleaned up late that fall.

So, where does that put us now?

Pattern Energy has constructed over 30 wind turbines immediately south and west of Oyen. Two of these turbines have been in conflict with our local airport. One in fact is 300 feet off center of the runway. Due to people working from home during the pandemic, the town letting their class 2 airport status lapse some 20 years ago and the energy company obviously trying to pull a fast one has given residents of Oyen and area a major challenge. Under some conditions the air ambulance will not fly in and medivac patients to the Medicine Hat Hospital.

Sadly, nobody will take responsibility of this glaring oversight. So now the local taxpayers are on the hook to improve runway lighting, install a real time weather station, have proper instrumentation and possibly even lengthening the runway.... all because of a couple of 7.5 million dollar wind turbines. Thus costing us an estimated \$100,000 not including runway expansion.

Further north in the Sedalia and New Brigden areas the Sharp Hills project is nearing completion. In fact the last turbine blades arrived by train in Oyen yesterday. I'm unaware of exactly how many turbines are going up but I can share several thoughts. The endless loads of gravel every day for concrete bases that was hauled all the way from Dunmore in Cypress County near Medicine Hat has beaten our highway 41 badly. Good for our infrastructure? No.

Good that how many thousand litres of diesel burned in the semis hauling the gravel for my environment? No. Good that the transient workers created problems in our and other nearby towns for our understaffed RCMP? No. Good that every single Borea construction truck had one person in them. Borea concerned about the environment? No.



So here we have 2 projects. Pattern/ Lanfine costing \$350 million and the Sharp Hills costing \$450 million. All due to tax credits and now foreign banking interference.

Now the proposed Oyen project.

Some 90 towers are proposed in two phases. My neighbours (myself included) were one of the few projects that were challenged with legal advice to move ahead. However after deliberation I decided not to “sign up”.....even as an adjacent landowner once signing up would be entitled to a “community benefit payment”. In short they’re trying to bribe me into signing up for their money.

I have two major issues with these things.

1: RES has contacted my sister who hasn’t lived here since high school and they talked her into signing up initially for a power line to be plowed underground. What the real surprise has turned out to be is they propose a turbine 812 m from my house and only 500 m from my residential quarter line. This contravenes our Special Areas land use policy. I’m thrilled so say the least and will be appealing any application on that particular site.

2. Caveats slammed on a quarter section where a tower/s are to be constructed. I had worried about this detail 15 years ago. I told them then that if a caveat was similar to a gas/oil surface lease I may be receptive to having a turbine on land away from farmers residences or yards. Only now due to farmers approaching lenders who want to put up a “signed quarter” for collateral for a machinery or land loan are now aware that due to the caveat the challenges have increased dramatically and some loan applications even denied.

Do these farmers know that you won’t be able to shoot a gopher or hunt a moose or deer?

Do my neighbours know the farm building restrictions they will be limited to?

Did my neighbours sign up for this or an “easy” 10 grand? I think it was the money.

Am I against progress? No I’m not. In fact Trans Canada Keystone and KXL pass through my land. The workers were in camps and controlled. Workers were bussed onsite everyday. The land was reclaimed back to farmable standard as soon as physically possible. Dealing with their land staff was actually enjoyable and extremely professional. When the project was completed TC made numerous large donations to our seniors lodge, Legion Hall and several other non- profits. THAT is what community benefit should be like.

In closing, I’ve had my experiences and have done my education and research. I’ve taken the time to travel to different parts of our province and seen firsthand what a cluster of 200 turbines in the County of 40 Mile did to their farmscape.



I truly hope this approval pause does everyone some good. Would I like to see a complete halt for these renewables in the future? Sure I would but I'm going to be realistic.

Caveats not locking up ones entire farming operation with ones similar to the Surface Rights Act. Rules and guidelines to ensure landowners aren't trapped with buyers remorse. Local municipal land use bylaws respected by energy companies, the AER and the AUC.

80 or 90% of those who signed up here live in town. They wake up in the morning like anyone else and have their coffee with the neighbour looking at them or hear a car racing down the street.

My farm has historical significance to my brother, niece and myself. 113 years. My grandfather's and father's legacy.

I'm hoping that gets some respect. In the community and at large

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Dear Alberta Utilities Commission,

I am writing to provide my input and perspective on the recent announcement by the Alberta Utilities Commission regarding the temporary pause on approvals for new renewable electricity generation projects. As a concerned stakeholder, I believe it is crucial to share my thoughts on this matter.

Firstly, I appreciate the AUC's initiative in seeking feedback from stakeholders regarding the implementation of the approval pause. It is evident that decisions of this nature have significant implications for our province's energy landscape and future sustainability.

In response to the options presented, I am in favor of **Option 1**, which involves a comprehensive review of the entire process. My rationale for supporting this option is rooted in the belief that the current approach necessitates a thorough re-evaluation. Several factors contribute to this viewpoint.

The concerns I have pertain to the entire renewable energy approval process, ranging from the signing of lease options prior to public consultation, to the limited input provided by communities on AEPA environmental referral reports, and the rigid legal expert requirements stipulated by the AUC. This combination of factors makes it challenging for the public to meaningfully



participate in a cost-effective manner. Consequently, I believe that a comprehensive review, conducted through a public inquiry, is necessary to address these issues comprehensively.

Given the complexities and intricacies involved, I am apprehensive about the efficacy of continuing with the approval review process as outlined in Options 2 and 3. If the AUC proceeds with accepting applications and executes partial processes under the existing guidelines, it could imply that substantive changes are unlikely. However, if substantial modifications are eventually introduced, re-evaluating all submitted applications would be an inefficient utilization of time and resources for both applicants and the AUC.

In light of the aforementioned challenges and potential setbacks, I believe that the decision to pause the approval process is prudent. This temporary pause not only acknowledges the need for reform but also allows for a comprehensive review that ensures all aspects of the process are thoroughly examined and improved upon.

In conclusion, I support **Option 1** due to the necessity of a comprehensive review that addresses the current shortcomings in the renewable energy approval process. The ultimate goal should be to establish a more transparent, participatory, and efficient process that encourages meaningful stakeholder input and promotes responsible renewable energy development in our province.

Thank you for considering my feedback on this critical matter. I appreciate the AUC's dedication to fostering a more sustainable energy future for Alberta, and I look forward to witnessing the positive changes that will arise from this review.

Sincerely,

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Dear AUC Members,



I am writing as a concerned Albertan resident in response to your stakeholder feedback request, dated August 3, 2023<sup>1</sup>. **I respectfully request that the AUC end the pause and immediately recommence approvals for renewable energy projects greater than 1MW.** I believe the decision to pause renewable projects of greater than 1MW<sup>2</sup> is unnecessary, will threaten thousands of jobs, will increase electricity costs for all ratepayers, will stifle billions of dollars in investment, and will slow efforts to address climate change. Alberta is the solar powerhouse of Canada, and we need to maintain our competitive edge.

I understand that you have a number of concerns you are seeking to address<sup>3</sup>:

- With respect to **land reclamation** concerns, please note that solar sites will remain viable well past the end of life of the original panels, and this will significantly reduce land reclamation needs. Additionally, The Government of Alberta already has reclamation [Guidelines for Renewable Energy Operations](#) which address this matter.
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- With respect to **land use** concerns, such as food security, wetland preservation and wildlife conservation, Solar Alberta has already created highly relevant Solar Siting Recommendations: <https://solaralberta.ca/solar-siting-recommendations/>. I believe you could review and adopt protocols such as these without a pause on approvals.

If the Government of Alberta and the AUC are unwilling to immediately end the pause, I respectfully request that you continue to fully process new and existing excluded applications without issuing any approvals until after the pause period (Option 3 in your announcement).

Thank you for considering my request.

Sincerely,

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Thank you for considering my request.

Sincerely,

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**Re: Response to AUC Inquiry on the pause to approvals for new renewable electricity generation**

## Company Background

reconcept RE Canada Ltd. (“reconcept”) is a 100% subsidiary of German renewable energy investment house and developer reconcept GmbH, founded in 1998. With offices in Hamburg, Berlin, Toronto, and Helsinki the company is focused on increasing its investments in renewable energy technologies in these growing markets. As an independent asset manager and international project developer, reconcept has extensive experience in financing, planning, construction, and operation of renewable energy projects. The company has invested approximately €609 million in 240 renewable energy plants since its founding, underscoring our commitment to realizing a clean energy future and representing an installed capacity of 385 MW. Our future development efforts in Germany include 1,000 MW under development of new solar projects.

## Investments in Alberta

Our investments in Canada began in 2014 and we have continued to support new clean energy projects in the country as it has traditionally provided a stable investment environment. These investments have included wind and hydro sites in British Columbia, along with a revolutionary tidal power investment in Nova Scotia. Through our office in Toronto, we have begun to invest in and develop new solar projects in Alberta. These projects would use small amounts of low value land (a single quarter section) and would include signings long-term lease agreements with landowners.

Our anticipated investment in the Alberta market alone would have been more than \$100 million CAD with equity sourced from individual German investors and debt financing provided by Canadian financial institutions. The benefits to Albertans from this investment would have included stable, long-term income for solar-hosting landowners, increased property tax revenues for rural municipalities, and economic opportunities for local businesses, suppliers, professionals, and trades near the projects. However, after the announcement by the Government of Alberta to pause renewable energy approvals through the AUC, our management is now forced to reconsider if Alberta is a good province to invest in on behalf of our shareholders, all of whom are private investors.

## Feedback on Approval Pause Options

Therefore, we implore the AUC to immediately take action to establish a schedule for the inquiry process, and in parallel to open the application process with the set of grandfathered regulations up to a transition date where new regulations, if warranted and justified, would then be implemented. Providing certainty to the process and a clear cross-over point will be the fairest and most certain way for ourselves, and other investors, to keep doing business in Alberta in a way that honours the principles of Fair, Efficient, Open and Competitive (FOEC) which we've come to learn exemplifies doing business in Alberta.

On the topic of the pause issues, in our view not all issues are of equal weight to all generation types. For example, issues for a solar project to a wind project and a hydroelectric project will all be seen differently. This needs to be efficiently considered and filtered by the AUC, to ensure that time is not wasted on minor or frivolous issues to one technology while being a very important point with stakeholders on another. To be most efficient with this work, we suggest that the inquiry include some form of working sessions for specific technology and for specific topics. This type of review further justifies grandfathering of new project applications in the interim, up to the point where new regulation might come in for certain technologies.

In anticipation that changes could be made to Rule 007 as a result of this inquiry, we request that all applications submitted during this pause and prior to any potential changes, are grandfathered and reviewed under the current Rule 007 structure. There should be a clear "effective date" as to when any changes take effect so that it is clear which projects will be impacted by the changes based on the timing of their application submission which will allow for some predictability for proponents. Additionally, we would support the alignment of the pause deadline and the inquiry deadline to both be February 29th, 2024. This will help ensure that all projects are treated fairly and by the same standards.

reconcept fully supports the option presented by the AUC for: "Approval hold only: The AUC continues to fully process new and existing excluded applications without issuing any approvals until after the pause period." To be clear, this means we support the continued processing of both new Checklist Applications and new power plant applications for wind, solar and storage projects for all new and existing applications during the pause period. Allowing applications to be submitted and reviewed by the AUC will provide some assurance to the industry and to investors that Alberta continues to be a viable place to do business and develop new projects. Further, this will help to ensure that there are no delays to investment in the province, nor would there be a backlog of new applications in the early part of 2024 once the inquiry has concluded.

## Conclusion

In summary, this unprecedented decision by the Government of Alberta needlessly and indefinitely freezes investment and development work, which requires a level of



certainty to proceed. We want to be part of growing the Alberta economy while doing our part to reduce carbon emissions. We strongly urge the AUC to consider this option as the best way to provide confidence to the renewable energy industry that projects will continue to be developed once the pause is lifted and that investors should still consider Alberta a safe place to invest.

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Direct Energy is of the view that a pause on approvals for new renewable electricity generation should disrupt the market as little as possible. Accordingly, Direct Energy supports the “approval hold only” option put forward by the AUC in its August 3<sup>rd</sup> announcement. By only pausing the final component of the process, AUC staff can continue to build the record for each paused application and businesses can anticipate the length of the delay. This will minimize investment uncertainty while concurrently allowing for the consideration of factors such as the cost of the integration of projects into the electricity system and the reliability of the overall system.

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Dear AUC Members,

I am writing as a concerned Albertan resident in response to your stakeholder feedback request, dated August 3, 2023<sup>1</sup>. **I respectfully request that the AUC end the pause and immediately recommence approvals for renewable energy projects greater than 1MW.** I believe the decision to pause renewable projects of greater than 1MW<sup>2</sup> is unnecessary, will threaten thousands of jobs, will increase electricity costs for all ratepayers, will stifle billions of dollars in investment, and will slow efforts to address pollution! Alberta is the solar powerhouse of Canada, and we need to maintain our competitive edge.

I understand that you have a number of concerns you are seeking to address<sup>3</sup>:

- With respect to **land reclamation** concerns, please note that solar sites will remain viable well past the end of life of the original panels, and this will significantly reduce land reclamation needs. Additionally, The Government of Alberta already has reclamation [Guidelines for Renewable Energy Operations](#) which address this matter.
- With respect to **end of life** concerns for renewable energy infrastructure disposal, the Alberta Recycling Management Authority (ARMA) is already piloting reuse and recycle programs for solar PV. Given that the majority of solar being installed today will be in operation for well over 25 years, ARMA is really out ahead on this matter. Furthermore, modern solar panels (manufactured after 2000) have [datasheets](#) that indicate their guaranteed performance and degradation



# AUC

Alberta Utilities Commission

characteristics and they all come in **under 0.4% degradation per year**, which translates to **over 90% functionality after 25 years** and **over 67% functionality after 100 years!** That's why they comfortably have 25 year warranties that don't just guarantee function but performance too.

- With respect to **land use** concerns, such as food security, wetland preservation and wildlife conservation, Solar Alberta has already created highly relevant Solar Siting Recommendations: <https://solaralberta.ca/solar-siting-recommendations/>. I believe you could review and adopt protocols such as these without a pause on approvals.

If the Government of Alberta and the AUC are unwilling to immediately end the pause, I respectfully request that you continue to fully process new and existing excluded applications without issuing any approvals until after the pause period (Option 3 in your announcement).

Thank you for considering my request.

Sincerely,

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Dear AUC Representatives,

I am writing in response to your stakeholder feedback request, dated August 3, 2023 (Minister announces pause on renewable projects).

**I respectfully request that the AUC end the pause and immediately recommence approvals for renewable energy projects greater than 1MW.**

I am a BC resident and I belong to a renewable energy investment cooperative. I serve as president on our board of directors (Peace Energy: A Renewable Investment Cooperative - [peacenenergy.ca](http://peacenenergy.ca)). I proudly represent members, investors, and employees from both BC and Alberta.

We've been talking about the potential detrimental effects this pause will have for Albertans and unique organizations such of ours. The moratorium will cause the loss of thousands of jobs, increase electricity costs, increase rates to customers, disrupt investment, and hobble projects which productively and safely begin to address the climate crisis we all face.

**Currently, Alberta is Canada's star in solar development and we need to maintain our competitive edge!**

I understand that you have a number of concerns you are seeking to address:



- With respect to **land reclamation** concerns, please note that solar sites will remain viable well past the end of life of the original panels, and this will significantly reduce land reclamation needs. Additionally, The Government of Alberta already has reclamation [Guidelines for Renewable Energy Operations](#) which address this matter.
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If the Government of Alberta and the AUC are unwilling to immediately end the pause, I respectfully request that you continue to fully process new and existing excluded applications without issuing any approvals until after the pause period (Option 3 in your announcement).

Your decisions will impact small member-owned cooperatives.

Thank you for considering my requests as I write on behalf of our Peace Energy Cooperative.

Sincerely,

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To Whom it May Concern,

I was hoping to provide feedback on the renewable energy pause for wind and solar projects over 1 megawatt until February 2024. It is my understanding that the window for this feedback closes today, August 18th.

I believe that the response to concerns over renewables has been a let down by the province and threatens an industry growing at 10% a year. Many jobs are at stake. While I understand the need to ensure renewable energy is sustainable for our power grid, I think the freeze on new projects is an overreaction from the province.

I hope that you can redirect my feedback to the appropriate address before the deadline if this belongs in a different inbox. I would also encourage you to extend the window for feedback, and make the address for feedback easier to find through a website search.

I hope this can be redirected to the correct address for feedback. The window provided to send the AUC feedback was very brief and I don't think this will allow enough people to engage with the topic and send their feedback. Also the place to send feedback was hard to search, hence this coming to your attention through the main inbox of AUC.

Thank you,

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- With respect to **land reclamation** concerns, please note that solar sites will remain viable well past the end of life of the original panels, and this will significantly reduce land reclamation needs. Additionally, The Government of Alberta already has reclamation [Guidelines for Renewable Energy Operations](#) which address this matter.
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If the Government of Alberta and the AUC are unwilling to immediately end the pause, I respectfully request that you continue to fully process new and existing excluded applications without issuing any approvals until after the pause period (Option 3 in your announcement).

Thank you for considering my request.

Sincerely,

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**RE: AUC to launch inquiry, implement pause on approvals for new renewable electricity generation** Dear Ms. Rees,

Low Carbon creates large-scale renewable energy to fight climate change. We invest in, develop, and operate solar, wind, energy storage, and energy from waste projects across the UK, Europe, and North America. We're contributing to the world's move to 100% renewable energy by creating and operating 20GW of new capacity by 2030.

Low Carbon is active in the Canadian renewables market and, in particular, has recently formed a Joint Venture with Nu-E Corp, a local renewable energy developer based in Calgary, to advance a portfolio of 600 MW of solar projects in Alberta. Low Carbon plans to expand this portfolio with the goal of bringing 1.2 GW of solar PV, onshore wind and battery storage projects in Canada online by the end of the decade.

As with many renewable developers in the Alberta market, Low Carbon was surprised when the AUC issued a 6 month permitting pause on approvals for new renewable electricity generation given the push by Canada and Alberta to increase renewable generation to meet its net zero targets and the announced investment tax credit incentives in Canada to support these targets.

Low Carbon understands the importance of the issues the AUC plans to review in the renewable permitting process during the 6 month permitting approval pause. Land use, viewscales, reclamation and impacts on the grid associated with renewable energy deployment are at the forefront of responsible renewable energy development. Low Carbon is committed to working with the AUC on these topics and any others during the 6 month permitting pause to help contribute to the best outcome for Alberta's future energy system.

Because of the large capital commitments required to develop renewable energy projects, pauses in permitting, such as the one the AUC has announced in Alberta, introduce timing risks and delays into the development process. Timing risks and delays increase the risk profile of projects and, in turn, the cost of capital for projects, which results in higher required power prices for renewable generation. To help mitigate this impact, Low Carbon supports an "Approval hold only" during the permitting approval pause, which will minimize the impact of the pause for developers that are ready to submit permitting applications or that are going through the permit review process with the AUC. If pertinent, we would welcome the opportunity to meet with you at a time that is convenient to discuss how we can continue to support you and Alberta's climate change commitments. Thank you for your consideration on this matter. Low Carbon looks forward to working with the AUC during this pivotal time.

Regards,

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**RE: Approval Pause implementation feedback (Aug. 3, 2023 - AUC Announcement)**

Dear Madam/Sir:

The Business Renewables Centre-Canada (BRC-Canada) exists to enable businesses and institutions to access renewable energy for their emissions reduction needs across Canada. This means working closely with buyers and developers of renewables and assisting them in shortening their learning curves as they figure out the best path to power purchase agreements. Our growing organization currently has about 60 participants from across all sectors of the Canadian economy.

BRC-Canada appreciates the opportunity to provide feedback on the implementation of the approval pause, as requested in the Alberta Utilities Commission (AUC) announcement of August 3, 2023. BRC-Canada also wishes to take this opportunity to comment on ancillary process considerations relating to the AUC inquiry into generation development in Alberta. The approval pause's interference in the Alberta electric energy market is unprecedented, unnecessary, unjustified and surprising. It impacts the ability of corporate and institutional buyers to procure the environmental attributes they need to satisfy Alberta's carbon pricing regulations on major emitters and the environmental, social and governance (ESG) expectations of global finance.

The negative impacts on the investment climate in Alberta are two-fold: direct, in terms of the

signal of hostility toward new renewable energy investment; and indirect, in terms of the signal that non-renewable investors and job creators in Alberta will be hampered in satisfying emissions reduction requirements.

We submit the following comments in the spirit of limiting, to the greatest extent possible, the deleterious impacts of the approvals pause on Alberta's economy and investment climate.

### 1) The AUC should minimize the impacts of the pause by implementing the “approval hold only” option

Recognizing that the *Generation Approvals Pause Regulation* (the *Regulation*) requires the AUC to

institute unprecedented interference in Alberta's electric energy market by singling out particular private sector energy projects for exclusion from approvals – and so long as that regulatory interference is in place – the AUC should implement the narrowest interference possible by only pausing approvals.

A) Alberta's electricity market regulatory framework requires the smallest possible discriminatory interference in the electricity market

It is a clear, central principle of the Alberta electricity regulatory framework that particular generation types should not be singled out for prohibition. The *Electric Utilities Act* states that the purposes of the *Act* include:

“to provide for a competitive power pool so that an efficient electricity market based on **fair and open competition** can develop, where **all persons wishing to exchange electric energy** through the power pool **may do so on non-discriminatory terms** and may make financial arrangements to manage financial risk associated with the pool price.” [Emphasis added]

It is clear that the approvals pause discriminates between generators wishing to exchange electric energy through the power pool by singling renewable energy out for prohibition on receiving the approvals required to build and operate a power plant to produce energy for exchange through the power pool. While the inquiry is not specific to renewable energy and includes all generation in its scope, the pause is applied only to renewable energy generation, leaving non-renewable generation sources unimpacted. The pause interferes with the fair, efficient and openly competitive (FEOC) operation of the electricity market.

To minimize the AUC's role in interfering with the proper FEOC operation of the market, the AUC should implement the most limited interference allowed under the *Regulation*. Indeed, it could be argued that the AUC does not have the authority to expand beyond the *Regulation* by further holding up applications at earlier stages prior to disposition.

B) The Minister made the government's intention clear that only approvals should be paused

The Minister of Affordability and Utilities has stated publicly that only 15 projects – those already in the AUC application process – are affected by the approvals pause. This clearly indicates the Minister's intent that the *Regulation* only pauses approvals. Expanding the delays to earlier AUC application processes would grow the list of projects that are delayed, contrary to the government's stated facts and intention to limit the obstruction that the pause causes to private, competitive generation projects.

C) Expanding the scope of the pause will further harm investor confidence in Alberta

In light of the harmful effects of the sudden, surprising approvals pause on investor confidence for investors in Alberta's electricity market, it is vital to mitigate these effects through the implementation of the pause. Unnecessarily expanding the scope of the pause will only



aggravate the signal of a hostile investment environment in Alberta. Through diligent and careful implementation of the pause, the AUC can begin to restore investor confidence in Alberta's electricity market.

2) **The scope of the policy recommendations arising from the inquiry should not apply to projects for which applications have been submitted**

The AUC should make clear from the beginning of the inquiry, that the policy recommendations resulting from the inquiry will not apply to assets that are already operating, projects that have received approval, or projects that have already applied to the AUC.

A) Only by grandfathering projects can the inquiry meet its purpose of providing investment certainty and clarity

The government has stated clearly and repeatedly that the inquiry, and the associated pause, are meant to bring greater certainty for renewable energy investment. This can only be accomplished if the rules governing projects are not changed mid-development.

The Minister of Affordability and Utilities stated the purpose of the inquiry and approvals pause as follows: to "provide future renewable investments with the certainty and clarity required for long-term development."

If projects that have already begun capital investment or have been through the full regulatory process are subject to policy and regulatory changes, this creates precedent for all future projects to face changing rules, undermining certainty and clarity. Moreover, projects that have already applied for approval have undertaken considerable development activities based on the existing rules, including: project design; landowner agreements; stakeholder and community engagement; and preparation of regulatory filings. Imposing new regulatory requirements on these projects will undermine, rather than improve, clarity.

B) Only by signalling grandfathering immediately can investor confidence begin to be restored

Investors should not have to wait until the end of the inquiry and the subsequent government policy development processes to gain certainty and clarity around the projects that they have in-flight. Only with immediate, clear statements on the scope of application of forthcoming policy and regulatory changes can investor confidence begin to be restored in Alberta's electricity market and regulatory regime. Only clear and immediate indications that Alberta's regulatory apparatus and government decision-makers intend to rebuild investor confidence can begin to repair the hostile signal sent by the sudden and unexpected pause.

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Thank you for the opportunity to provide initial feedback on the implementation of the approvals pause and the launch of the AUC inquiry. We are optimistic that expedient and diligent action to repair investor confidence in renewable energy development and in the availability of renewable energy attributes for corporations and institutions can begin to restore a properly functioning free market for electric energy and emissions offsets in Alberta.

If you have any questions, please reach out at your convenience.

Sincerely,

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As a resident of the MD of Pincher Creek I would like to see a stop to the windmills being constructed. I live in one of the most beautiful places in the country and the windmills are destroying our beautiful landscape. Please put a stop to them before there are no views left to enjoy.

Sincerely

Good day,

My name is XXXXXXXX and I own several quarters of farmland and have two yards near the proposed subject project.

It has come to my attention that Elemental Energy continues to try pursue this project despite concerns from area residents, and seem to be unwilling to answer the simplest of questions making a mockery of the current public consultation process.

At this point a complete abeyance needs to be enacted in order to properly review the entire regulatory application process.

My legal representation Willms & Shier have explained our rationale, which I have attached to this email.

Thank you.

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**Re: Six-Month Approvals Pause Feedback - Northern Valley Families Support a Complete Abeyance of Approvals for New Renewable Electricity Generation**

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Willms & Shier Environmental Lawyers LLP is environmental legal counsel to approximately 50 families in Northern Valley, Alberta. Our clients reside immediately adjacent to the Northern Valley Wind Project currently proposed by Elemental Energy.

We understand that the Alberta Utilities Commission (the "AUC") is seeking stakeholder feedback about its implementation of a six-month moratorium on approvals for new renewable electricity generation.

For the reasons outlined below, our clients respectfully submit that a six-month complete abeyance of approvals is appropriate during which time the AUC:

- 1 does not accept new applications,
- 2 places all existing excluded applications on hold, and
- 3 takes no further steps to complete their record or issue decisions.

**COMPLETE ABEYANCE OF APPROVALS NECESSARY FOR PROCESS RE-EVALUATION**

Our clients strongly support a review of the entire AUC approvals process. This includes addressing issues spanning from the signing of lease options before public consultation, to the lack of input from communities on Alberta Environment and Protected Area environmental reports, through to the AUC's mandate and its applicable test for granting approvals.



Given the ongoing re-evaluation of the entire AUC process, our clients' view is that a complete abeyance of approvals during the six-month moratorium is the most appropriate course of action.

The alternate options being considered by the AUC, including a partial abeyance or a hold on issuing approvals until after the moratorium, are not consistent with the purpose of the AUC process review. Under these options, if the public inquiry leads to changes in the AUC approvals process, existing applications would likely have to be resubmitted and reviewed again at significant time and financial expense to all parties involved. Similarly, existing projects in the pre-AUC application phase may be preparing materials based on a set of requirements that may change.

### **COMPLETE ABEYANCE REQUIRED FOR PROCEDURAL FAIRNESS**

Taking any approach other than a complete abeyance during the review process would, in our view, also breach the principles of procedural fairness and legitimate expectation.

The Supreme Court of Canada in *Baker v Canada (Minister of Citizenship & Immigration)* set out guiding principles as follows:<sup>1</sup>

... if a legitimate expectation is found to exist, this will affect the content of the duty of fairness owed to the individual or individuals affected by the decision. If the claimant has a legitimate expectation that a certain procedure will be followed, this procedure will be required by the duty of fairness: . . . . Nevertheless, the doctrine of legitimate expectations cannot lead to substantive rights outside the procedural domain. This doctrine, as applied in Canada, is based on the principle that the "circumstances" affecting procedural fairness take into account the promises or regular practices of administrative decision-makers, and that it will generally be unfair for them to act in contravention of representations as to procedure, or to backtrack on substantive promises without according significant procedural rights. [Emphasis added, portions of the quoted paragraph and citations omitted.]

*Schwarz Hospitality Group Ltd. v. Canada (Minister of Canadian Heritage)*<sup>2</sup> followed *Baker* and presents a cautionary take for administrative decision-makers in the midst of a moratorium.

In *Schwarz*, the Minister of Canadian Heritage imposed a one-year development moratorium for certain types of development in Banff National Park for the purpose of reviewing the guidelines applicable in the circumstances. Notwithstanding the moratorium, Officials at Parks Canada continued to consult with a developer about an existing development proposal.

This ongoing consultation – akin to the partial abeyance options being considered by the AUC – resulted in the developer successfully bringing a *mandamus* order against Parks Canada requiring Parks Canada to adjudicate on the developer's proposal in accordance with the original approval process and guidelines in place before the moratorium was implemented.

This outcome was entirely antithetical to the purpose of the moratorium.

### **CONCLUSION**

Our clients respectfully submit that a complete abeyance moratorium, rather than a partial one, is the best course of action to both:

- 1 permit all stakeholders and the AUC to start afresh under any revised AUC procedures, and
- 2 maintain consistency within the AUC's existing duty of procedural fairness.

Yours truly,

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This outcome was entirely antithetical to the purpose of the moratorium.

### **CONCLUSION**

Our clients respectfully submit that a complete abeyance moratorium, rather than a partial one, is the best course of action to both:

- 1 permit all stakeholders and the AUC to start afresh under any revised AUC procedures, and
- 2 maintain consistency within the AUC's existing duty of procedural fairness.

Yours truly,

Dear Ms. Rees and AUC Members,

I am an Alberta resident and am writing today to express my strong concern and opposition to the announced pause on new renewable power plant approvals. This communication is in response to your stakeholder feedback request, dated August 3, 2023. I do not have any direct financial interest in this decision other than the impacts on all Alberta households and businesses.

**I respectfully request that the AUC end the pause and immediately recommence approvals for renewable energy projects.** This moratorium is unnecessary, discriminatory, and counter to the longstanding legislated market principle of Fair, Efficient, Open, and Competitive management of Alberta's electrical utilities. This decision threatens thousands of jobs, increases electricity costs for all ratepayers (industrial, commercial, and residential), undermines property rights, will stifle billions of dollars in investment, and increases air and greenhouse gas emissions to the detriment of public health and climate change. Renewable energy development is one of the best things happening in the Alberta economy and is desperately needed to reduce the historically high electricity prices and support clean economic growth. The AUC and government should be looking at ways to accelerate and maximize the benefits of renewable electricity development rather than creating red tape and investor uncertainty that hurts businesses and households.

In response to the specific concerns you are seeking to address:

- With respect to **impacts on agricultural or environmental land**, this is an important issue but is not unique to renewable power. In fact other types of development are creating significantly more negative impacts on these landscapes and have never had a pause on approvals, so it is discriminatory to treat renewable power plants differently in a standalone process. Alberta has been a leader in cumulative effects management and land use planning which is the appropriate mechanism to manage this issue, without pausing approvals. The same is true for impacts on Alberta's viewscape. It is unheard of to restrict private land development due to visual impacts and there are many developments that are significantly more impactful that have not been treated similarly. I find solar and wind projects to be of neutral impact to our viewscape and see them as a sign of hope. Solar Alberta has also created highly relevant Solar Siting Recommendations: <https://solaralberta.ca/solar-siting-recommendations/> that could be considered without a pause on approvals.
- I am glad to see that you are considering allowing responsible development of **renewables on crown land**. It is unbelievable that renewables are not allowed on crown land, even if they are willing to take over already disturbed sites from other



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industries. Since this is not currently allowed there is no reason to pause approvals to consider this important issue.

- With respect to **land reclamation** concerns, please note that renewable sites will remain viable well past the end of life of the original solar panels or turbines, components will simply be replaced, and this will significantly reduce land reclamation needs. Renewables have basically zero land, water or air contamination risks. We have many other more impactful development types that will have more significant end of life challenges much sooner, so this is again unfair and inefficient to pause approvals for this reason. Additionally, The Government of Alberta already has reclamation [Guidelines for Renewable Energy Operations](#) which address this matter. The Alberta Recycling Management Authority (ARMA) is already piloting reuse and recycle programs for solar PV. Given that the majority of solar being installed today will be in operation for well over 25 years, ARMA is really out ahead on this matter.
- With respect to considering impacts of renewables on the electricity grid, this is once again important work but is not a reason to pause approvals. Alberta is many years from the share of renewables reaching the level that it would create grid management issues that are beyond the ability of the AESO to manage with existing tools, not to mention innovations that are already underway. There are also many jurisdictions around the world that are managing much higher shares of renewable energy production and Alberta can learn from these experiences to manage this challenge. New technologies are also available and being developed that turn this challenge into an opportunity for consumers and investors. Emissions Reduction Alberta, Alberta Innovates, and their innovation partners are doing great work to prove and pilot these opportunities.

I do not believe any of the options listed in the consultation are valid. This moratorium is unnecessary, has significant negative impacts, and should be ended immediately. If the Government of Alberta and the AUC are unwilling to immediately end the pause, I respectfully request that you continue to fully process new and existing excluded applications without issuing any approvals until after the pause period (Option 3 in your announcement).

Thank you for considering my request. Please do the right thing for the province and end this moratorium on renewable power plant approvals.

Sincerely,

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### **PACE Submission to the AUC in Response to Aug 3 Announcement**

Pathfinder Clean Energy based in the United Kingdom, and Goldbeck Solar, based in Germany, are developers of renewable energy projects around the world. Together they formed PACE Canada LP who has 53MW of AUC approved solar generation projects under construction in Alberta and over



1.8GW of Alberta based solar and battery projects in development expected to be submitted to the AUC for approval in the coming months. As you can see, PACE will be directly and adversely impacted by any interruption in the AUC permitting and approval process for renewable generation development. PACE appreciates the AUC reaching out to the industry with its August 3 Announcement (AUC to launch inquiry, implement pause on approvals for new renewable electricity generation) and wishes to take this opportunity to provide the AUC with feedback on the pause and inquiry. We hold very grave concern with the implementation of an industry wide pause on development and the potential negative investment climate this will instill in the Alberta renewable generation industry.

PACE recommends the AUC implement the Approval Hold only option and continue to fully process all new and existing applications during the pause period. This will ensure that the AUC is able continue its normal workload and avoid a backlog or bottleneck of applications after the pause. The AUC will then be able to approve all reasonable and completed applications as soon as the pause is lifted, on February 29, 2024, or sooner if possible.

PACE understands the AUC, public and government concerns but does not feel this broad-brush approach of a complete industry pause follows reasonable fairness protocol. Applications and projects which are not creating issues with the points raised in the July 21, 2023, AUC letter to the government

should not be punished (the development of power plants on high value agricultural lands and the lack of mandatory reclamation security requirements for power plants). These types of projects should continue to be processed under the existing policies and AUC Rule 007. This “grandfathering”

is an established AUC principle and will provide certainty and maintain investor confidence.

PACE also suggests the AUC commit to completion of its inquiry by January 31, 2024, in advance of the government directed approval pause ending February 29, 2024, and the government directed inquiry deadline of March 29,

2024. This will allow the government time to review the inquiry report and make any necessary regulatory amendments prior to the expiry of the pause, avoiding the awkward situation of the pause expiring while amendments are in play but not formalized until coming months.

The inquiry will be very broad and far reaching and as such would benefit from the implementation of a module approach. There are a number of these issues and areas that may be resolved more easily and more quickly than others and modules for these could be conducted expediently, potentially



leading to release of these findings earlier. This would serve to reduce the dampening effect of the pause by showing progress and reasonability. Modules could be established for agricultural land, environmental land, viewscales, reclamation security, and Crown land. Many stakeholders would only participate in the modules affecting them, allowing for more efficiency and less stakeholder burnout.

PACE appreciates that the AUC is limited in its ability to vary from the direction set out by the government in Order in Council 2023-171 and Order in Council 2023-172. However, PACE encourages the AUC to provide feedback received from industry participants on the crippling impact this pause will have on the renewable electricity industry in Alberta and request the government to remove the pause.

Thank you for the opportunity to submit feedback on these issues and please feel free to reach out to me if you have any questions on this.

Sincerely,

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To whom it may concern,

McCain Foods Ltd, and its subsidiaries (collectively “McCain”), is a Canadian leader in the food industry, with over 20,000 employees globally and more than 225 employees in southern Alberta along with decades of operational experience in Alberta. McCain is actively working to transition to more renewable

and sustainable operations in Alberta and across the globe: in this endeavor McCain is actively looking to secure renewable power sources at our Alberta Coaldale plant in the coming years.

We strongly recommend an 'Approval Hold Only' process whereby the AUC will continue to process new and existing applications during the pause period.

If the application window remains open during the inquiry period, we believe that proponents may still advance meaningful work on project development and allow for the AUC in parallel to continue the inquiry

process. There should be a transition date set by the AUC when any regulatory changes might come into effect, for all to plan around and have regulatory certainty.

In this way, projects like ours can be adaptively managed to continue development and at the same time,

adjust to meet the critical regulatory conclusions that might be applied in the future. We believe that the

AUC can manage this parallel process and that a complete stop to accepting new applications is not warranted. A full halt to site development work and AUC applications seems to be a needlessly cautious approach where industry-leading standards and regulations have been in place for years and appear adequate, if not worthwhile to evaluate, update and amend. Ultimately, such an abrupt stop to project applications is very detrimental to regulatory certainty.

It would be most prudent for the AUC to confirm that any applications filed prior to the release of the final

inquiry report should be grandfathered and adhere to the current Rule 007 approach and that any new regulations set a clear effective date after the final inquiry report, such that any applications filed prior to



the effective date may follow the process outlined in the then-current version of the Rule. This will provide

some element of regulatory predictability for projects that are considering moving forward in the near term, which would be helpful given the uncertainty caused by the pause.

AESO can successfully maintain a reliable grid for Alberta, and a full pause of all projects is not warranted. McCain supports the AUC in running the public inquiry process but asks that clarity be given for projects filed before the results are known.

Thank you for your consideration of this submission and support in allowing us to execute our corporate sustainability mission with our business interests in Alberta.

Sincerely

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Dear AUC Members,

I am writing as a concerned Albertan resident in response to your stakeholder feedback request, dated August 3, 2023<sup>1</sup>. **I respectfully request that the AUC end the pause and immediately recommence approvals for renewable energy projects greater than 1MW.** I believe the decision to pause renewable projects of greater than 1MW<sup>2</sup> is unnecessary, will threaten thousands of jobs, will increase electricity costs for all ratepayers, will stifle billions of dollars in investment, and will slow efforts to address climate change. Alberta is the solar powerhouse of Canada, and we need to maintain our competitive edge.

I understand that you have a number of concerns you are seeking to address<sup>3</sup>:

- With respect to **land reclamation** concerns, please note that solar sites will remain viable well past the end of life of the original panels, and this will significantly reduce land reclamation needs. Additionally, The Government of Alberta already has reclamation [Guidelines for Renewable Energy Operations](#) which address this matter.
- With respect to **end of life** concerns for renewable energy infrastructure disposal, the Alberta Recycling Management Authority (ARMA) is already piloting reuse and recycle programs for solar PV. Given that the majority of solar being installed today will be in operation for well over 25 years, ARMA is really out ahead on this matter.
- With respect to **land use** concerns, such as food security, wetland preservation and wildlife conservation, Solar Alberta has already created highly relevant Solar Siting Recommendations: <https://solaralberta.ca/solar-siting-recommendations/>. I believe you could review and adopt protocols such as these without a pause on approvals.

If the Government of Alberta and the AUC are unwilling to immediately end the pause, I respectfully request that you continue to fully process new and existing excluded applications without issuing any approvals until after the pause period (Option 3 in your announcement).

Thank you for considering my request.

Sincerely,



My name is XXXXXXXX and I own an acreage and am a stakeholder in Northern Valley where a wind project is being proposed. My family has lived in the Northern Valley region for three generations and I would like to make it known, as a stakeholder, that it is necessary that a “complete abeyance” be enacted in order to properly review the entire regulatory application process. My legal representation, Willms & Shier, has explained our rationale, which I have attached to this email.

Sincerely,

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**Re: Six-Month Approvals Pause Feedback - Northern Valley Families Support a Complete Abeyance of Approvals for New Renewable Electricity Generation**

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Willms & Shier Environmental Lawyers LLP is environmental legal counsel to approximately 50 families in Northern Valley, Alberta. Our clients reside immediately adjacent to the Northern Valley Wind Project currently proposed by Elemental Energy.

We understand that the Alberta Utilities Commission (the “AUC”) is seeking stakeholder feedback about its implementation of a six-month moratorium on approvals for new renewable electricity generation.

For the reasons outlined below, our clients respectfully submit that a six-month complete abeyance of approvals is appropriate during which time the AUC:

- 1 does not accept new applications,
- 2 places all existing excluded applications on hold, and
- 3 takes no further steps to complete their record or issue decisions.

**COMPLETE ABEYANCE OF APPROVALS NECESSARY FOR PROCESS RE-EVALUATION**

Our clients strongly support a review of the entire AUC approvals process. This includes addressing issues spanning from the signing of lease options before public consultation, to the lack of input from communities on Alberta Environment and Protected Area environmental reports, through to the AUC’s mandate and its applicable test for granting approvals.

Given the ongoing re-evaluation of the entire AUC process, our clients' view is that a complete abeyance of approvals during the six-month moratorium is the most appropriate course of action.

The alternate options being considered by the AUC, including a partial abeyance or a hold on issuing approvals until after the moratorium, are not consistent with the purpose of the AUC process review. Under these options, if the public inquiry leads to changes in the AUC approvals process, existing applications would likely have to be resubmitted and reviewed again at significant time and financial expense to all parties involved. Similarly, existing projects in the pre-AUC application phase may be preparing materials based on a set of requirements that may change.

### **COMPLETE ABEYANCE REQUIRED FOR PROCEDURAL FAIRNESS**

Taking any approach other than a complete abeyance during the review process would, in our view, also breach the principles of procedural fairness and legitimate expectation.

The Supreme Court of Canada in *Baker v Canada (Minister of Citizenship & Immigration)* set out guiding principles as follows:<sup>1</sup>

... if a legitimate expectation is found to exist, this will affect the content of the duty of fairness owed to the individual or individuals affected by the decision. If the claimant has a legitimate expectation that a certain procedure will be followed, this procedure will be required by the duty of fairness: . . . . Nevertheless, the doctrine of legitimate expectations cannot lead to substantive rights outside the procedural domain. This doctrine, as applied in Canada, is based on the principle that the "circumstances" affecting procedural fairness take into account the promises or regular practices of administrative decision-makers, and that it will generally be unfair for them to act in contravention of representations as to procedure, or to backtrack on substantive promises without according significant procedural rights. [Emphasis added, portions of the quoted paragraph and citations omitted.]

*Schwarz Hospitality Group Ltd. v. Canada (Minister of Canadian Heritage)*<sup>2</sup> followed *Baker* and presents a cautionary take for administrative decision-makers in the midst of a moratorium.

In *Schwarz*, the Minister of Canadian Heritage imposed a one-year development moratorium for certain types of development in Banff National Park for the purpose of reviewing the guidelines applicable in the circumstances. Notwithstanding the moratorium, Officials at Parks Canada continued to consult with a developer about an existing development proposal.

This ongoing consultation – akin to the partial abeyance options being considered by the AUC – resulted in the developer successfully bringing a *mandamus* order against Parks Canada requiring Parks Canada to adjudicate on the developer's proposal in accordance with the original approval process and guidelines in place before the moratorium was implemented.

This outcome was entirely antithetical to the purpose of the moratorium.

### **CONCLUSION**

Our clients respectfully submit that a complete abeyance moratorium, rather than a partial one, is the best course of action to both:

- 1 permit all stakeholders and the AUC to start afresh under any revised AUC procedures, and
- 2 maintain consistency within the AUC's existing duty of procedural fairness.

Yours truly,

The Canadian Renewable Energy Association (CanREA) represents more than 350 companies active in the Canadian renewable energy market, including manufacturers, operators, developers and service providers to the wind, solar and energy storage industries. We appreciate the opportunity to provide feedback on the upcoming Inquiry into the ongoing economic, orderly and efficient development of electricity generation in Alberta.

CanREA submits that this Inquiry can be conducted without pausing AUC approvals. The industry is now facing unprecedented levels of risk and uncertainty, as well as concerns that the Fair, Efficient and Open Competition (FEOC) principles that the energy-only market is based on are being compromised.

We are eager to provide the following recommendations to get the process back up and running, and to minimize the economic harms created by the decision to pause approvals.

This letter provides a response to the Commission's request for feedback on the implementation of the approval Pause ("the Pause"), dated August 3, 2023, while offering further suggestions on the approach of the Inquiry. In addition to comments on the implementation of the Pause, CanREA also offers further recommendations on the following issues:

- Expedited Timeline for Completion of the Inquiry Report
- Grandfathering Approach for New and Existing Applications
- Capacity Threshold for Impacted Projects
- Module-based Approach to Inquiry

In addition, CanREA submits that the Inquiry outcomes will need to provide certainty and predictability to counter-balance all the uncertainty that has been created as a result of this Pause. Where warranted, projects following a clear set of rules should have an expedited approval process available to them.

#### **Implementation of Approval Pause**

CanREA recommends that the Commission implement only an Approval Hold, and continue to fully process all new and existing applications during the Pause period. The AUC will need to confirm that project applications will be approved based on *all applicable* rules and requirements in place at the time of application<sup>1</sup>. This approach will ensure that the Commission is prepared to continue approvals immediately once the Pause is lifted on February 29, 2024.

CanREA is concerned about a large influx in applications upon completion of the upcoming AESO "Cluster Study" for connections, and continuing to process new and existing applications reduces the risk that the AUC will need to process two significant bottlenecks of applications in 2024.

#### **Expedited Timeline for Completion of the Inquiry Report**

In order to ensure fairness and efficiency, the AUC should commit to a December 31, 2023, completion and publication of the Inquiry report. This will create alignment between the Inquiry and the AESO's Cluster Study process, which has a Preliminary Assessment Package to be issued by December 31, 2023. Project proponents will need to know the outcome of the Inquiry in order to decide whether to proceed with their connections and the associated financial commitments.

#### **Grandfathering Approach for New and Existing Applications**

Currently, there is considerable concern regarding the impact of the Inquiry on applications that developers had intended to file during the Pause period. Under an "Approval Only" Pause, the Province and AUC must provide certainty for these projects as the AUC undertakes the

upcoming Inquiry, so that projects that have already been delayed by the Pause are not further delayed by the implementation of new policy approaches resulting from the Inquiry.

CanREA recommends that the Commission grandfather the current *Rule 007* approach and any related policies or regulations for any applications filed prior to the release of the Inquiry report.

There is clear precedent for the AUC to follow this approach. This approach is consistent with previous *AUC Rule 007* amendments over the last decade, in which there was established a clear “effective by” date included with any amendments. For instance, the current version of *Rule 007* was approved on March 18, 2022, but not effective until April 25, 2022. Any applications filed prior to April 25 would be covered by the previous version of *Rule 007*.

Similarly, any applications filed prior to any forthcoming changes to *Rule 007* should be covered by the now-current version of the rule.

Due to the Pause and the wide-ranging approach to the Inquiry, our members are entering a time of unprecedented uncertainty. The Minister of Affordability and Utilities has been clear that it is the government’s intent to reduce uncertainty during this period. The best way to maintain any certainty during this Pause is to ensure that current applicants are evaluated under the most current AUC criteria, as has been the practice during all periods of *Rule 007* review.

### Capacity Threshold for Impacted Projects

CanREA recommends that the AUC provide clarity on the capacity threshold for impacted projects. Currently, there are several projects between 1 MW and 5 MW that are under development across the province on commercial and industrial sites. Due to the Inquiry’s focus on agricultural land issues, it is unfair to these commercial and industrial projects that their timelines are put at risk due to policy challenges that do not impact their efforts. It is our understanding that Microgeneration, which can be up to *a total nameplate capacity that does not exceed the lesser of 5 MW or the rating of the customer’s service*<sup>2</sup>, is exempt from the Pause. We urge the Commission to make this clear to market participants so as to safeguard progress on all projects that are eligible to proceed.

### Module-based Approach to Inquiry

The terms of this Inquiry cover a wide range of issues facing the renewable energy industry and the communities in which we operate. There are a number of these issues that may be resolved more easily and more quickly than others. It is recommended that the Commission organize and schedule the Inquiry such that issues that can be managed more quickly are accelerated, with preliminary findings for these issues released on an expedited basis.

CanREA would be pleased to discuss appropriate modules and an appropriate schedule for those modules that can be expedited to reduce uncertainty, and those modules which may require more time.

For instance, considerations of implementing mandatory reclamation security requirements for power plants can be addressed fairly quickly. Developers will be able to outline how they provide acceptable security for project landowners, and the AUC can address formalization if necessary.

Similarly, examining the potential for opening Crown lands for wind and solar projects can be addressed as a separate module. However, in this instance, CanREA submits that while enabling renewable energy development on Crown lands is important, there is no reason to delay submission of the Inquiry report and extend the Pause in order to achieve this. The Inquiry could simply establish a process to be completed post-Pause. To be clear, a specific Crown-land module should be created, so that this issue can be addressed in a timely fashion, and the AUC should ensure that Indigenous communities are included in the module. Not only are most other energy developments in Alberta permitted on Crown lands, but the majority of other provinces can provide a sector-specific model for how renewables could be permitted and access land in these areas.

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Thank you once again for the opportunity to provide feedback on the development of your Inquiry. It is of utmost urgency to our industry and members that the AUC move quickly on the development of this approach, and to move quickly on the Inquiry itself. Due to the Pause, investment and Alberta jobs are being put at risk, and it is critical that it be lifted as soon as possible. Without further information regarding the Inquiry or details from the report, our industry's future in Alberta is in question.  
If you have any further comments or questions, please do not hesitate to contact us.  
Regards,

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Dear Alberta Utilities Commission:

Bright Diamond Consulting is a small Canadian-owned start-up renewable energy consulting company with six employees and a network of partnership consultants in Alberta. We started in business in 2017 and are currently providing a variety of consulting services to several domestic and international Independent Power Producers (IPPs) with renewable energy projects in Alberta, or with a desire to invest in new projects in Alberta in the future. Therefore, we have strong experience in the origination, planning, regulatory, commercial off-take, financing and construction aspects of renewable energy projects in Alberta and actively work on AUC applications with our client base. Having worked on multiple large-scale wind and solar projects locally on the ground with municipalities and landowners and working with our clients on regulatory filings with the AUC and other entities, we have extensive experience and understanding of the regulatory framework and of how the inquiry issues are manifesting themselves with development projects today. That said, as a consulting firm doing a lot of the upfront and on the ground development work, and working closely with communities, we believe that a complete pause on AUC applications is not warranted and would appear overly cautious at the present time to address the inquiry topics noted. We believe that the current regulatory framework is robust and sufficient to continue to review new projects and assess impacts, even as it pertains to the inquiry topics. Of course, there is room for improvement and standardization, and we look forward to the AUC reviewing and updating appropriate and robust regulations for some or all of the inquiry topics.

As requested by the AUC, Bright Diamond Consulting wishes to clearly endorse and recommend the "Approval hold only" option whereby the AUC continues to accept and process new applications during the pause period. Projects that might be filed prior to the full conclusion of the inquiry report should be grandfathered under the old AUC rules and any updates, if and as needed, could be applied after at an established and consulted 'update deadline' to fall under the new rules, as amended. This approach of review and approval in the interim period will avoid two clear negative outcomes of the current situation for the AUC and the industry:

- (1) the active halt (and in some cases pullout) of investment in the market by some entities who are trying to make near and medium term investment decisions on new renewable projects in Alberta and require more clarity on the process and timing of new regulations before making a final investment decision, and
- (2) a bottleneck of new project applications and administrative overload on the AUC, with a potential windfall of new applications the day after the pause is lifted, and which might further incite confusion, processing inefficiencies (i.e. who goes first?), delays for the AUC and industry members

alike, and will certainly compound the uncertainty felt in the market which could linger for much longer than simply the stated ‘pause’ period timeframe.

Beyond the question at hand of what to do with applications specifically, more broadly for the inquiry process itself, it is our view that the AUC must fast-track a clear timeline and process schedule to communicate and provide stability for the market. Ideally the AUC would split out different workstreams for specific topics and technologies, setting a clear schedule and process right away. Different stakeholders and different experts will be needed in different aspects of the inquiry process, and the sooner this can be split up and initiated, the better it will be for the AUC process, the outcomes, and for the market in general. As usual, the AUC should make all of the filings and proceedings public and close off smaller and faster proceedings as reasonable to “sectionalize” the topics and build its final inquiry report to government in a modular fashion. This will be the most efficient way to conduct the inquiry whilst keeping investors and stakeholders alike invested in the process and the Alberta renewables market in general, all the while keeping the market advancing toward the goal of longer-term decarbonization of the Alberta electricity sector and broader economy.

Providing transparency and clarity on the process will reinforce and hopefully reverse the current environment of uncertainty and risk in the market and will establish a collaborative environment and approach with industry to conduct the inquiry with the market principles in mind of a Fair, Efficient, Open and Competitive (FEOC) process. In this way, the process will stay true to the market principles which have aligned with Albertans for decades, and which we believe all stakeholders and the AUC want to uphold, and ultimately what gives Alberta that business advantage over other jurisdictions.

Bright Diamond Consulting is a renewables-only consultancy started in Canada by Canadians within the green economy, and we deeply believe in our work for a brighter future for Alberta and Canada. Indeed, we want to be part of growing the Alberta economy and are proud to be a small part of its ongoing energy transition. We thank you for your consideration to this feedback and look forward to the next steps and updates in the process.

Sincerely,

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We strongly feel that the AUC should implement complete abeyance with this approval pause for the following reasons:

1. There are costs associated with sending a mixed message through partial abeyance or on hold only approvals – the need to re-review each application if non-compliant with new regulations, and the personal costs to the Albertans who welcomed this moratorium as a sign that their government was willing to listen to their legitimate concerns.
2. Redeployment of all AUC staff to focus on this inquiry vs. day-to-day business should result in a better result and speedier outcome for industry and all stakeholders.

Staff could be used for education and consultation with Rural and Urban Municipalities (either one on one similar to the recent consultation with the MD of Smoky River, led by JP Mousseau), or at upcoming RMA and AUMA Conferences.

Finally, according to the US Wind Database, the largest wind turbines installed at a commercial wind farm are 5.6 MW Vestas, at the Truascott-Gilliand (TG) East Wind Farm (Escalade) Project in Texas, located at [33°44'46.7\"N 99°39'55.8\"W - Google Maps](https://www.google.com/maps/place/33°44'46.7\). These turbines have a hub height of 119 m, and a rotor diameter of 162 m, for a total height of 200 m, or 656’.



As AB taxpayers, we would support a delegation from the AUC to view this operating wind farm, as a reference point for the current AUC inquiry.

Based on a quick Expedia search, the approximate cost per person for a weekday direct flight from Calgary to Dallas Fort/Worth, with a car rental (the site is approx. 3 hours away from the airport) and hotel for 3 nights would be \$2,000 Canadian. This seems like a small cost to obtain first hand knowledge and understanding of the possible impacts (noise, visual, footprint, etc.) that these very large structures will have on nearby residents.

Thank you,

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Dear Ms. Dahl Rees,

As chair of the Riplinger Wind Concerned Citizens Group located in the areas of Hill Spring/Mountain View/Waterton, I am writing you regarding the recent approval pause on all new renewable energy applications made to the Alberta Utilities Commission.

After consulting with members of our group, we would like to express our support for the following option:

Partial abeyance: The AUC does not accept new applications during the pause period. For all existing applications with an incomplete record, the AUC process will proceed to the point where the written evidence is complete, applications will then be placed in abeyance until the pause period expires. The AUC will not hold any public hearings for these applications during the pause period. Existing applications with a complete record will be placed in abeyance until the pause period expires.

Since February of 2023 we have been dealing with the proposed Riplinger Wind Project by TransAlta Corporation. Our group of highly engaged citizens have witnessed many problems with the public engagement process, required environmental studies, the accuracy of those studies, and issues with land agents using deceptive tactics to have landowners sign on to the project. We fully support the Alberta Government and the AUC implementing this pause. It is our understanding that with a complete or partial abeyance in place, TransAlta will not be able to make application, during the paused period, to the AUC on the Riplinger Wind Project.

We are chiefly concerned about the fact that this one project will do extensive damage to:

- a) the work of so many environmental and conservation groups that have been present in this area for decades, studying and preserving the unique biodiversity and ecosystem found in the Crown of the Continent.
- b) the absolute beauty of our 'prairie to peak' landscape as this project is located within 10 kms of Waterton National Park



c) the numerous family owned and operated tourism businesses located within mere kilometers of this project

d) the thousands of migratory birds and bats that we witness coming through this riparian area

Thank you for considering our feedback on the 'pause' process and we look forward to working with you further as this inquiry progresses.

Sincerely,

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**RE: Feedback on implementation of pause on approvals for new renewable electricity generation**

Dunmore Solar Inc. ("Dunmore") wishes to thank the Alberta Utilities Commission for extending the opportunity to provide feedback on its implementation of the renewable energy approvals pause imposed by Order in Council 172/2023.

Dunmore Solar Inc. is majority owned by Teralight Ltd., based in Tel Aviv, Israel. Dunmore is developing the Dunmore Solar Project ("Project"), a 216 MWac solar power plant that was approved by the Commission on September 9, 2021 in Decision 26485-D01-2021. Since acquiring the Project in 2021, our companies have progressed the Project to a ready to build status and anticipate commercial operations by the end of Q1 2025.

The Dunmore Solar Project represents the entry of Teralight into the Alberta energy space and, notably, Alberta is the only Canadian jurisdiction that was selected for investment due to its long history of energy development and "open for business" regulatory environment. In addition to the investment in the project rights purchase, Dunmore has paid the Generating Unit Owner's contribution and is advancing procurement and other execution expenditures – and the approval pause is very concerning to Dunmore despite having an approved project. Such arbitrary change to regulation does not reflect the stable investment climate that attracts development and construction investors and lenders and makes other provinces and international jurisdictions more appealing. Dunmore encourages the Commission to expedite the mandated review and pursue clarity and regulatory certainty as quickly as possible.

In regard to the three selections offered by the Commission as a means to implementing the approvals pause, Dunmore is supportive of the "Approval Hold Only" option.

- Complete abeyance: The AUC does not accept new applications during the pause period and all existing applications are placed in abeyance during the pause period.
  - Partial abeyance: The AUC does not accept new applications during the pause period, but processes all existing applications with an incomplete record to the point where the written evidence is complete, at which point these applications are placed in abeyance until the pause period expires. No public hearings are held for these applications.
  - Approval hold only: The AUC continues to fully process new and existing applications without issuing any approvals until after the pause period.
-



**Re: “Pause” on Approvals for New Renewable Electricity Generation**

Further to the announcement of the AUC on August 3, 2023, that it is seeking stakeholder feedback on implementing an approval pause in respect of certain new application types, please accept this letter as our response.

We note, first of all, that neither Alberta nor the AUC made any attempt to consult with the Piikani Nation prior to the announcement of the pause, despite your duty to consult. This despite the fact that many projects are located within Blackfoot Territory, and the pause gives preference to non-renewable generation projects within Blackfoot Territory, over renewable projects. It is the view of the Piikani Nation that non-renewable projects in general have a greater impact upon the land and environment in Blackfoot Territory than do renewable projects, particularly wind power projects. The focus of the pause is therefore the reverse of what we would be inclined to support had Alberta or the AUC condescended to consult with us.

Secondly, as the AUC is aware, the Piikani Nation has been developing a wind power project, to be built entirely upon the Piikani Reserve, through its subsidiary, Piikani Resource Development Ltd. (“PRDL”). We had expected that PRDL would be bringing an application before the AUC in respect of that project within the period that is now covered by the pause.

We expect that the pause will result in the creation of a backlog of applicants, as a result of which the actual delay will last significantly longer than seven months, and will impact even applicants that apply after the pause. This has an impact on our ability to attract investors, and our existing financing arrangements; not to mention a delay in the commissioning of the project and our ability to earn income from it. As the AUC is aware, this is not the first time the Piikani Nation has suffered long-term delays in approvals, and significant corresponding losses, as a result of decisions of the AUC outside of our control and to the benefit of non-Indigenous parties.

Once again, we find ourselves as a First Nation unable to benefit from our own natural resources because of arbitrary government actions, which preferentially benefit other parties at our expense, without any consultation with us before the decision is made. This despite the fact that the concerns that gave rise to the pause have little application to our circumstances.



The land upon which our project is to be built lies entirely upon Reserve land, which lies outside the jurisdiction of the Province. It is land which has been reserved by our people for community grazing and other specified purposes, as determined by the Piikani Nation's own internal process. This is not a class of agricultural or environmental land that Alberta has jurisdiction to regulate; nor do we believe that the Province has any intention of regulating in these areas.

Furthermore, the Province has no jurisdiction over what we build on the Piikani Reserve, whether or not it believes that our improvements impact on "Alberta's pristine viewsapes."

With respect to "implementing mandatory reclamation security requirements", we again note that our wind power project would be constructed on the Piikani Reserve. Implementing such security requirements is typically addressed within the process of obtaining a permit from Indigenous Services Canada pursuant to s. 28(2) of the *Indian Act*. Typically, such permits contain a provision requiring the posting of a security deposit, which security deposit is paid to the Piikani Nation's capital account held by the Federal government. Furthermore, we doubt that Alberta has jurisdiction to impose any other security requirement relating to reclamation of "lands reserved for Indians," as that phrase is used in s. 91(24) of the *Constitution Act, 1867*.

As the land in question is Reserve land held by the Crown in Right of Canada in trust for the Piikani Nation, it goes without saying that it is not land that is held by the Crown in Right of Alberta.

As a result of the foregoing, we submit that the pause should not be applicable to projects being constructed on Federal Crown land in general, and Indian Reserve land in particular. Given how few projects likely lie within those categories, it is unlikely that they would have any significant impact on the generation supply mix or electricity system reliability that could not be addressed through the ordinary regulatory process.

In the alternative, we submit that the AUC should continue to process new and existing excluded applications without issuing any approvals until after the pause period, in accordance with the "Approval Hold Only" option. This will hopefully reduce any backlog in applicants that would otherwise occur.

We trust we have made our position clear. Should you have any questions or comments, or

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I am writing as a concerned Albertan resident in response to your stakeholder feedback request, dated August 3, 2023<sup>1</sup>. **I respectfully request that the AUC end the pause and immediately recommence approvals for renewable energy projects greater than 1MW.** I believe the decision to pause renewable projects of greater than 1MW<sup>2</sup> is unnecessary, will threaten thousands of jobs, will increase electricity costs for all ratepayers, will stifle billions of dollars in investment, and will slow efforts to address climate change. Alberta is the solar powerhouse of Canada, and we need to maintain our competitive edge.

I understand that you have a number of concerns you are seeking to address<sup>3</sup>:

- With respect to **land reclamation** concerns, please note that solar sites will remain viable well past the end of life of the original panels, and this will significantly reduce land reclamation needs. Additionally, The Government of Alberta already has reclamation [Guidelines for Renewable Energy Operations](#) which address this matter.
- With respect to **end of life** concerns for renewable energy infrastructure disposal, the Alberta Recycling Management Authority (ARMA) is already piloting reuse and recycle programs for solar PV. Given that the majority of solar being installed today will be in operation for well over 25 years, ARMA is really out ahead on this matter.
- With respect to **land use** concerns, such as food security, wetland preservation and wildlife conservation, Solar Alberta has already created highly relevant Solar Siting Recommendations: <https://solaralberta.ca/solar-siting-recommendations/>. I believe you could review and adopt protocols such as these without a pause on approvals.

If the Government of Alberta and the AUC are unwilling to immediately end the pause, I respectfully request that you continue to fully process new and existing excluded applications without issuing any approvals until after the pause period (Option 3 in your announcement).

Thank you for considering my request.

Sincerely,

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**Re: AUC Proceedings 27837 – SPWC Responses to AUC Request for Feedback on Approvals Pause**

Dear Ms. Wen,

Further to your letter dated August 3, 2023, and the Government of Alberta's announcement to pause approvals of new renewable energy projects over one megawatt until February 29, 2024, the Alberta Utilities Commission (AUC) has issued a letter requesting stakeholder feedback on implementing the pause.

SPWC Development GP Inc. (SPWC), is proposing to construct and operate the Willow Ridge Wind Project (the Project), a 204.6 megawatt (MW) wind power generation and 50 MWh Battery Energy Storage System facility situated approximately 7.2 km south of Fort MacLeod, Alberta on privately owned lands within 8-26 W4M, 8-25 W4M, 7-26 W4M, and 7-25 W4M in the Municipal District (M.D.) of Willow Creek, Alberta.

SPWC has spent significant financial resources over the last five years working with private landowners and key stakeholders developing this renewable energy project. SPWC submitted the project application to the AUC on December, 2022 and it is currently planning to submit a request to be removed from a voluntary abeyance by August 18<sup>th</sup>, which was implemented to address unforeseen municipal ordinance changes resulting in minor infrastructure rerouting.

The almost seven-month unplanned and unprecedented pause implemented by the Alberta government will have significant negative implications on the proposed Project, and overall investment and development confidence in Alberta. Implications for the Project include:

- Cancelling or delaying our planned overall investment of \$460M and direct benefit to the Alberta economy;
- Significant delays to the Project schedule (resulting from, amongst other things, permitting delays, AESO delays and procurement delays);
- Energy offtake agreement negotiations severely impacted due to the regulatory uncertainty created by the pause
- Delayed financial benefits to landowners from lease payments and to the M.D. (via taxes) as a result of Project operations; and
- Project cost increases impacting financial viability due to delays in signing major agreements such as Turbine Supply Agreement, and Engineering, Procurement and Construction agreement.



Alberta Utilities Commission

In your letter of August 3, 2023, the AUC requested feedback on three potential options relative to the pause and invited comment on any additional options. SPWC believes projects that have already submitted an application to the AUC in advance of August 3, 2023 should be exempted from the 'pause' and proceed under current rules through to, and including, a decision on the applications and approval, as applicable, by the AUC. Barring this possibility, the 'next best' option would be, as proposed by the AUC, the "Approval hold only" option where the AUC continues to fully process new and existing applications without issuing any approvals until after the pause period. Of the options presented by the AUC, the "Approval hold only" is the alternative which minimizes further unwarranted delays and harms caused by the moratorium.

Finally, it should be noted that the Project has committed in the AUC application to put in place financial surety for decommissioning and reclamation. A Reclamation Plan is included in the application. This overall financial security topic was one of the items of interest that the AUC has been directed to inquire into as described in the August 3, 2023 AUC announcement. In regard to the AUC's planned consideration on development of power plants on agricultural lands, we would like to highlight that the percentage of agricultural land impacted by the Project development is less than 1.5% (approx. 27 hectares) of the Project's leased agricultural land (approximately 1830 hectares), and agricultural operations will be able to continue around the Project's turbines and associated infrastructure.

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In our view, both of the other listed options have significant potential to create a backlog of applications and subsequent delays related to project review and approval timelines. Our concern is that, following the pause, further delays will continue well into 2024 slowing the arrival of new electricity supply even further. The Approval Hold Only option will allow for the continued submission and processing of applications to the point of approval thereby avoiding additional project review and approval delays in the future. This option provides some degree of regulatory certainty and will continue to allow renewable generation projects to be submitted to the Commission, reviewed, and readied for approval following the pause.

Teralight expects an investment of \$250 million to complete construction of the Dunmore Solar Project adding significant value to the local and provincial economy. Teralight supports collaboration with the Commission to further the continued development of a fair, efficient, and openly competitive electricity market while incentivizing investment, growth and innovation in Alberta's economy.

Teralight thanks the Commission for immediately considering options for implementation of the approvals pause and we look forward to participating.

Sincerely,

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Dear AUC Members,

I am writing as a concerned Albertan in response to your stakeholder feedback request, dated August 3, 2023. I respectfully request that the AUC end the pause and immediately recommence approvals for renewable energy projects greater than 1MW. I believe the decision to pause renewable projects of greater than 1MW is unnecessary, will threaten thousands of jobs, will increase electricity costs for all ratepayers, and will stifle tens of billions of dollars in investment. Alberta is the solar powerhouse of Canada, and we need to maintain our competitive edge.

I understand that you have a number of concerns you are seeking to address:

With respect to land reclamation concerns, please note that solar sites will remain viable well past the end of life of the original panels, and this will significantly reduce land reclamation needs. Additionally, The Government of Alberta already has reclamation Guidelines for Renewable Energy Operations which address this matter.

With respect to end of life concerns for renewable energy infrastructure disposal, the Alberta Recycling Management Authority (ARMA) is already piloting reuse and recycle programs for solar PV. Given that the majority of solar being installed today will be in operation for well over 25 years, ARMA is really out ahead on this matter.

With respect to land use concerns, such as food security, wetland preservation and wildlife conservation, Solar Alberta has already created highly relevant Solar Siting Recommendations: <https://solaralberta.ca/solar-siting-recommendations/>. I believe you could review and adopt protocols such as these without a pause on approvals.

I am disappointed that all the options were for some amount of pause because it really isn't needed. However, if the Government of Alberta and the AUC are unwilling to immediately end the pause, I respectfully request that you continue to fully process new and existing excluded applications without issuing any approvals until after the pause period (Option 3 in your announcement).

Thank you for considering my request.

Sincerely,

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Dear AUC Members,

I am writing as a concerned Albertan resident in response to your stakeholder feedback request, dated August 3, 2023. I respectfully request that the AUC end the pause and immediately recommence approvals for renewable energy projects greater than 1MW. I believe the decision to pause renewable projects of greater than 1MW is unnecessary, will threaten thousands of jobs, will increase electricity costs for all ratepayers, will stifle billions of dollars in investment, and will slow efforts to address Climate Change.

This year alone, the effects of Climate Change has destroyed homes and livelihood of a lot of Albertans, Canadians and many other people around the world. The entire world is going through major crisis due to the effects of Climate Change and we as Albertans need to show leadership in the fight against the effects of Climate Change.

I design and install Solar PV Projects in several countries around the world and to date I have not seen any government put a stop or slow down renewable projects. Alberta is the first one!! I currently work in 13 different countries.

I understand that you have a number of concerns you are seeking to address:

- 1) With respect to land reclamation concerns, please note that solar sites will remain viable well past the end of life of the original panels, and this will significantly reduce land reclamation needs. Additionally, The Government of Alberta already has reclamation Guidelines for Renewable Energy Operations which address this matter.



# AUC

Alberta Utilities Commission

- 2) With respect to end of life concerns for renewable energy infrastructure disposal, the Alberta Recycling Management Authority (ARMA) is already piloting reuse and recycle programs for solar PV. Given that the majority of solar being installed today will be in operation for well over 25 years, ARMA is really out ahead on this matter.
- 3) With respect to land use concerns, such as food security, wetland preservation and wildlife conservation, Solar Alberta has already created highly relevant Solar Siting Recommendations: <https://solaralberta.ca/solar-siting-recommendations/>.

I believe you could review and adopt protocols such as these without a pause on approvals.

Thank you for considering my request.

Sincerely,

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Thank you for the opportunity to provide input into implementing the approval pause for renewable energy applications.

Universal Kraft Canada Renewables (UKCR) is an Alberta based renewable energy developer with a portfolio of 7 projects totalling approximately 1.5GW. The company is formed by global renewable energy developer Universal Kraft and Finnish renewable energy investor Korkia. Korkia has 11 investments in 8 countries with a global portfolio of +12GW. The Commission's announcement of August 3, 2023, has significantly raised the risk profile on our investments in Alberta. As of August 2023, we have invested approximately \$13M and are forecasting an additional \$20M in development investments. In total, our Alberta projects represent a potential capital investment in the order of \$2 Billion.

In the Commission's announcement of August 3<sup>rd</sup>, 2023, the Commission requested stakeholder feedback on the implementation of the approval pause. Universal Kraft Canada Renewables recommends that the Commission implement an Approval Hold only and continue to fully process all new and existing applications during the pause period. This implementation will reduce investor uncertainty and ensure that the Commission is prepared to continue approvals immediately once the pause is lifted on February 29, 2024.

Importantly, the industry is expecting a significant volume of AUC facility applications will be submitted when the Alberta Electric System Operator (AESO) completes the first cluster connection process in May 2024. Therefore, it is essential that the current approval pause not exacerbate what will be a very busy time for the Commission and result in significant delays to investment. Continued processing of current applications and allowing new applications to be submitted will balance the workload for the Commission.

Furthermore, the AUCs moratorium compounds the schedule risk companies are already bearing from the introduction of the AESO's new cluster process. This additional delay may lead to investors placing projects on hold or even withdrawing from the market, leaving only the deepest of pockets to participate in Alberta's green energy transition.

Continued processes of transactions also allow Universal Kraft to maintain current employment levels with related economic benefits to the province. A stop in all AUC activity related to renewables would require Universal Kraft, and all renewable developers, to reconsider employment levels, which, on the whole, would have a material impact on corporate financial performance, individual lives and the Alberta economic activity.

Reducing the players in this market may likely also lead to an increase cost of electricity to consumers. The exercise of market power through higher offer behavior was cited by the Market Surveillance Administrator in the Quarterly Reports for both Q1 and Q2 2023<sup>1</sup>. Reducing the number market participants will only exacerbate this problem.





Universal Kraft Canada Renewables also recommends that the Commission communicate the intention to grandfather the current *Rule 007* approach for any applications filed prior to the release of new or amended AUC rules. This clarification will significantly enhance investor confidence. Precedent is for the AUC to announce an effective date for new or amended rules when they are published, with applications submitted prior to the effective date considered under the rules that existed at the time of filing. For example, the Commission announced changes to Rule 007 on March 5, 2021, with the revised rules taking effect on September 1, 2021. ([media.www.auc.ab.ca/prd-wp-uploads/News/2021/2021-03-05-Announcement.pdf](https://media.www.auc.ab.ca/prd-wp-uploads/News/2021/2021-03-05-Announcement.pdf)).

Grandfathering existing projects, i.e., allowing them to proceed through the end of the existing approval process, is also essential for other organizations that are involved in the development process such as the Alberta Ministry of Environment and Protected Areas. Universal Kraft Canada Renewables has expended a significant amount of development capital on projects that are now subject to the pause, and it must not be a wasted investment. Furthermore, significant work is undertaken by the Ministry to review the environmental implications of electricity projects and it would be unspeakably wasteful for months of Ministry work to be discarded.

Combined, the continued processing of applications and clarification of the grandfathering of applications in a transparent manner, will send a strong signal to all investors that Alberta is a stable, competitive and attractive place to invest. It will reduce the risk to Universal Kraft Canada Renewables investments and increase the confidence of all energy investors in the stability and viability of investment opportunities in Alberta. It will also ensure that Alberta retains its strength and leadership position in Canada's green energy transition.

Thank you for the opportunity to provide feedback on the approach to your inquiry into the development of electricity generation in Alberta. We look forward to participating in the inquiry and to the rapid resolution of the important issues that have been raised.

Please to not hesitate to contact us if you have any further comments or questions.

Regards,

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To Whom it May Concern:

On August 3, 2023, the Alberta government enacted the Generation Approvals Pause Regulation that required the Alberta Utilities Commission ("AUC") to pause the approval process for all renewable projects over 1 MW. This unprecedented "pause" not only included new project filings but also impacted projects that had already filed Applications for AUC approval ("In-Flight") under the current AUC Rule 007. As result of the "pause" the AUC has requested feedback from impacted stakeholders on processing alternatives for In-Flight applications during the "pause" period.

As background Proteus Power Developments LLC is the owner and developer of Proteus Alberta Solar 1 Ltd, Proteus Alberta Solar 2 Ltd and Proteus Alberta Solar 3 Ltd located near Hays, Alberta. These projects filed a single AUC application on July 10, 2023 (Proceeding 28325). On August 2, 2023, Proteus received its first Information Request from the AUC with a response due date of August 17, 2023 that has been submitted. As the AUC is fully aware the process of preparing the AUC application is a significant time and monetary commitment which includes extensive stakeholder engagement and environmental reviews. In response to your invitation for feedback Proteus offers its following preferred path forward for our Hays solar projects with recommendations for other In-Flight projects.

We firmly believe that all projects In-Flight should continue to be processed under current Rule 007, as existed at the time of the applications, including any deemed public hearing(s) and issuance of the final decision. We recognize this is not one of the alternatives that was presented for stakeholder feedback and is not in-line with the directive. However, we do believe it is the fairest to all parties involved and we would request that the AUC advocate this position with the Minister to revise his directive accordingly. Advocating for any other position unfairly burdens In-Flight projects with new unknown requirements when they followed all Rule 007 requirements in good faith at the time of their application. The uncertainty of the "pause"

period also comes with additional cost burden to the In-Flight projects as it delays their ability to finalize engineering and design work already underway and continue with project financing requirements which in-turn impacts the ultimate commercial viability of projects.

Proteus is not unsympathetic to the issues that are to be considered during this period, but at the same time recognizes there are current industry safeguards in place that responsibly developed projects have already considered and implemented. Proteus offers the following as specific examples related to our projects and for general considerations:

- With regards to the reclamation and decommissioning – The lease documents for the Proteus projects include specific commitments and require the posting of financial security to cover the cost of restoration and decommissioning at the end of their project lives. This type of security requirement could easily be implemented to ensure standard practice with future AUC directives.
- With regards to land use – The Proteus projects are located on marginal grazing lands that were relinquished back to the owner who made the decision to convert some of that land for crop development and lease the remainder for solar. Proteus has undertaken an extensive program of assessment and mitigations as represented in our AUC Application, including plans to implement agrivoltaic practice to encourage community sheep grazing and to provide regional pollinator enhancement from within the solar area. In general landowners, including those in the agricultural community, make an independent social and economic decision as to whether to enter into a land agreement to host a renewable energy project. Developers certainly do not have the ability to “force” any landowners to convert the current use to a future renewable host. Many projects are already allowing grazing of certain livestock on the property to local farmers to help preserve or in some cases increase acreage available for such purposes. With respect to land use concerns for wetland preservation and wildlife conservation, the Alberta Environment and Protected Areas (“AEPA”) have stringent guidelines that are enforced on the industry, and we don’t believe any additional AEPA regulations are required. Other public lands, pristine parkland and prime agricultural lands require more definition and should be considered through a proper engagement process, outside of the parameters of the “pause” process.
- Impact of increasing renewables on Alberta’s generation supply mix and electric reliability – Proteus, as with other developers, works closely with the AESO to follow all directives and requirements relating to the interconnection of the renewable generation. The AESO has control over the dispatch of the generation to assure stability and reliability of the transmission systems. We are confident that the AESO has and will continue to maintain the existing outstanding reliability of the transmission system including the implementation of a robust ancillary services market for energy storage. As part of the Western Electric Coordinating Council (WECC) the AESO is fully aware of the industry standards and addresses the potential issues presented by intermittent generating resources. As a final



point in the support letter to the Minister the AESO did not mention reliability, only the support for clarity on land use and reclamation issues. As with the others points, we do not believe this rises to a level of requiring a “pause”.

Proteus looks forward to a positive engagement with AUC to address the concerns highlighted by the government while at the same time maintaining fairness to those In-Flight projects in the AUC process.

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Dear AUC Members,

I am writing as a concerned Albertan resident in response to your stakeholder feedback request, dated August 3, 2023<sup>1</sup>. **I respectfully request that the AUC end the pause and immediately recommence approvals for renewable energy projects greater than 1MW.** I believe the decision to pause renewable projects of greater than 1MW<sup>2</sup> is unnecessary, will threaten thousands of jobs, will increase electricity costs for all ratepayers, will stifle billions of dollars in investment, and will slow efforts to address climate change. Alberta is the solar powerhouse of Canada, and we need to maintain our competitive edge.

I understand that you have a number of concerns you are seeking to address<sup>3</sup>:

- With respect to **land reclamation** concerns, please note that solar sites will remain viable well past the end of life of the original panels, and this will significantly reduce land reclamation needs. Additionally, The Government of Alberta already has reclamation [Guidelines for Renewable Energy Operations](#) which address this matter.
- With respect to **end of life** concerns for renewable energy infrastructure disposal, the Alberta Recycling Management Authority (ARMA) is already piloting reuse and recycle programs for solar PV. Given that the majority of solar being installed today will be in operation for well over 25 years, ARMA is really out ahead on this matter.
- With respect to **land use** concerns, such as food security, wetland preservation and wildlife conservation, Solar Alberta has already created highly relevant Solar Siting Recommendations: <https://solaralberta.ca/solar-siting-recommendations/>. I believe you could review and adopt protocols such as these without a pause on approvals.

If the Government of Alberta and the AUC are unwilling to immediately end the pause, I respectfully request that you continue to fully process new and existing excluded applications without issuing any approvals until after the pause period (Option 3 in your announcement).

Thank you for considering my request.

Sincerely,

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If the Government of Alberta and the AUC are unwilling to immediately end the pause, I respectfully request that you continue to fully process new and existing excluded applications without issuing any approvals until after the pause period (Option 3 in your announcement).

Thank you for considering my request.

Sincerely,

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Our names are XXXXXXXXXXX. We grain farm and have breeding livestock in the immediate area where the Northern Valley Project is being proposed. We feel that with this being an area full of farm residences, this is not an appropriate area to have ocean sized wind mills set up. These alien looking structures would devastate our beautiful landscape! I would like to make known, as a stakeholder, that it is necessary that a "complete abeyance" be enacted in order to properly review the entire regulatory application process. My legal representation, Willms & Shier, has explained our rationale, which I have attached to this email.

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# AUC

Alberta Utilities Commission

**Re: Six-Month Approvals Pause Feedback - Northern Valley Families Support a Complete Abeyance of Approvals for New Renewable Electricity Generation**

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Willms & Shier Environmental Lawyers LLP is environmental legal counsel to approximately 50 families in Northern Valley, Alberta. Our clients reside immediately adjacent to the Northern Valley Wind Project currently proposed by Elemental Energy.

We understand that the Alberta Utilities Commission (the “AUC”) is seeking stakeholder feedback about its implementation of a six-month moratorium on approvals for new renewable electricity generation.

For the reasons outlined below, our clients respectfully submit that a six-month complete abeyance of approvals is appropriate during which time the AUC:

- 1 does not accept new applications,
- 2 places all existing excluded applications on hold, and
- 3 takes no further steps to complete their record or issue decisions.

**COMPLETE ABEYANCE OF APPROVALS NECESSARY FOR PROCESS RE-EVALUATION**

Our clients strongly support a review of the entire AUC approvals process. This includes addressing issues spanning from the signing of lease options before public consultation, to the lack of input from communities on Alberta Environment and Protected Area environmental reports, through to the AUC’s mandate and its applicable test for granting approvals.

Given the ongoing re-evaluation of the entire AUC process, our clients' view is that a complete abeyance of approvals during the six-month moratorium is the most appropriate course of action.

The alternate options being considered by the AUC, including a partial abeyance or a hold on issuing approvals until after the moratorium, are not consistent with the purpose of the AUC process review. Under these options, if the public inquiry leads to changes in the AUC approvals process, existing applications would likely have to be resubmitted and reviewed again at significant time and financial expense to all parties involved. Similarly, existing projects in the pre-AUC application phase may be preparing materials based on a set of requirements that may change.

### **COMPLETE ABEYANCE REQUIRED FOR PROCEDURAL FAIRNESS**

Taking any approach other than a complete abeyance during the review process would, in our view, also breach the principles of procedural fairness and legitimate expectation.

The Supreme Court of Canada in *Baker v Canada (Minister of Citizenship & Immigration)* set out guiding principles as follows:<sup>1</sup>

... if a legitimate expectation is found to exist, this will affect the content of the duty of fairness owed to the individual or individuals affected by the decision. If the claimant has a legitimate expectation that a certain procedure will be followed, this procedure will be required by the duty of fairness: . . . . Nevertheless, the doctrine of legitimate expectations cannot lead to substantive rights outside the procedural domain. This doctrine, as applied in Canada, is based on the principle that the "circumstances" affecting procedural fairness take into account the promises or regular practices of administrative decision-makers, and that it will generally be unfair for them to act in contravention of representations as to procedure, or to backtrack on substantive promises without according significant procedural rights. [Emphasis added, portions of the quoted paragraph and citations omitted.]

*Schwarz Hospitality Group Ltd. v. Canada (Minister of Canadian Heritage)*<sup>2</sup> followed *Baker* and presents a cautionary take for administrative decision-makers in the midst of a moratorium.

In *Schwarz*, the Minister of Canadian Heritage imposed a one-year development moratorium for certain types of development in Banff National Park for the purpose of reviewing the guidelines applicable in the circumstances. Notwithstanding the moratorium, Officials at Parks Canada continued to consult with a developer about an existing development proposal.

This ongoing consultation – akin to the partial abeyance options being considered by the AUC – resulted in the developer successfully bringing a *mandamus* order against Parks Canada requiring Parks Canada to adjudicate on the developer's proposal in accordance with the original approval process and guidelines in place before the moratorium was implemented.

This outcome was entirely antithetical to the purpose of the moratorium.

### **CONCLUSION**

Our clients respectfully submit that a complete abeyance moratorium, rather than a partial one, is the best course of action to both:

- 1 permit all stakeholders and the AUC to start afresh under any revised AUC procedures, and
- 2 maintain consistency within the AUC's existing duty of procedural fairness.

Yours truly,

Dear Ms. Graham:

We are in receipt of the Alberta Utilities Commission's ("AUC" or "Commission") letter dated August 3, 2023 ("AUC Letter"),<sup>1</sup> in which the Commission advised that participants in the Proceeding could file submissions on the record of the Proceeding that relate to the implementation of the approvals pause ("Pause") that was initiated by the recently enacted *Generation Approvals Pause Regulation* ("Regulation").<sup>2</sup> The following submissions relative to the Pause are made on behalf of Aira.

### **The Regulation and Associated Materials**

On August 3, 2023, the Government of Alberta ("Government") enacted the Regulation, which prohibits the AUC from issuing power plant approvals for renewable energy power plants until March 1, 2024.<sup>3</sup> The Government also issued a document titled "Backgrounder: AUC pause and Inquiry" ("Backgrounder"),<sup>4</sup> which provides some limited information as to the potential scope for the inquiry related to renewable energy power plants that will be held by the AUC ("Inquiry"). Amongst other things, the Backgrounder advised that the Inquiry will consider:

- the development of renewable energy power plants on specific types or classes of agricultural land;
- the impact of renewable energy power plants on viewscales; and
- mandatory reclamation security requirements for renewable energy power plants (collectively, the "Backgrounder Topics").<sup>5</sup>

Also on August 3, 2023, the Commission issued an "Announcement" in which the Commission advised that it would be holding the Inquiry and that it was also seeking feedback from stakeholders on the implementation of the Pause ("Announcement").<sup>6</sup> The feedback sought in the Announcement relative to the implementation of the Pause is the same as the AUC Letter.



## **The Project and the AUC Process To-Date**

The Project is owned by Aira, a wholly-owned subsidiary of CI IV Transfer Coöperatief U.A. Investment Platform and managed by Copenhagen Infrastructure Partners (“CIP”).<sup>7</sup> CIP is the world’s largest fund management investment firm investing solely in clean energy infrastructure projects. To date, CIP has developed and constructed more than 30 clean energy projects across the globe representing an over \$20 billion investment. CIP has been active in Alberta since 2020 with its first investment in the province, the 465 MW, \$800 million Travers Solar Project followed by the 495 MW, \$1 billion Buffalo Plains Wind Project that is currently under construction. Most recently, CIP also opened its Canadian headquarters office in Calgary due to the strong market fundamentals, growth opportunities and stable regulatory environment that the Alberta electricity market has previously offered.

The Project is situated on entirely private land south of Bow Island, Alberta. It will generate up to 450 MW of clean renewable electricity. The Project will provide significant benefits to the County of Forty Mile (“County”), to local landowners and the surrounding community, and to the province of Alberta. The Project represents a nearly \$1 billion investment that will create 800-1000 construction jobs and 5-15 full time operations jobs.<sup>8</sup> Over the life of the Project it will generate approximately \$100 million in municipal property tax income, approximately \$145 million in lease payments to landowners, and provide community benefits to local non-profit organizations and the County.

While the Project is located on cultivated land, the land in question is considered class 4-6 agricultural land, which is classified as providing “severe to extremely severe limitations for sustained production of crops. Class 4 is marginal for sustained production of crops, and cultivation is not recommended, even on an occasional basis, on class 6 lands”.<sup>9</sup> No landowners with homes located near the Project raised concerns about the Project. Furthermore, Aira has reclamation security requirements in place in all our landowner agreements.<sup>10</sup>

A public hearing for the Project was held in May 2023. On June 26, 2023, the AUC determined that the Applications relative to the Project were complete and the Proceeding record was closed on June 22, 2023.<sup>11</sup> Aira was scheduled to receive an AUC decision on the Applications on or before September 20, 2023.<sup>12</sup> Prior to the Regulation being enacted and the Pause being initiated, the regulatory process for the Project and the Applications was effectively complete as only the decision remained outstanding.

### **Procedural Fairness Principles**

The Commission has consistently held that it “owes all parties in its proceedings a duty of procedural fairness”.<sup>13</sup> The Commission has also recognized that “it is in the public interest to maintain business efficacy, legislated objectives, and regulatory certainty”.<sup>14</sup> Regulatory certainty requires that companies are able to anticipate and plan for the regulatory processes to which they are subject:

The principle of regulatory certainty recognizes that there is significant benefit and strong preference for certainty and stability in the regulatory process. For public policy reasons, companies should have the ability to operate in an environment that is predictable.<sup>15</sup>

The Commission has recently reaffirmed that it is committed to ensuring its "regulatory processes are efficient, predictable, and fair."<sup>16</sup>

Aira submits that both the principles of procedural fairness and regulatory certainty are engaged in this instance.

Procedural fairness is a "flexible and variable" duty, the requirements of which are dependent on, as set out in *Baker v Canada (Minister of Citizenship & Immigration)*:<sup>17</sup> the nature of the decision being made; the nature of the statutory scheme; the importance of the decision to those affected by it; the legitimate expectations of the person challenging the decision; and the choice of procedure made by the decision maker.<sup>18</sup>

In the first place, the statutory scheme in this instance, the Regulation, is not determinative. As acknowledged by the fact of the issuance of the AUC Letter, the Commission has discretion in the implementation of the legislatively imposed Pause. The Regulation provides no guidance on the consideration of power plant approvals by the Commission other than to prevent the final issuance of one. It does not prevent the AUC from issuing a decision on an application for such an approval or prescribe additional factors for consideration in doing so. The Commission should focus on the fundamental procedural fairness principles at play when implementing the Pause.

One of those principles is legitimate expectations, where the Alberta Court of Appeal has stated that "[i]f the party challenging a decision has a legitimate expectation that a certain procedure will be followed, this procedure will be required by the duty of fairness."<sup>19</sup> The Commission has confirmed its understanding that "a party's legitimate expectation can give rise to procedural obligations" but noted that "to be enforceable, the expectation must be based on a clear and unequivocal representation from the decision-maker as to procedure."<sup>20</sup>

Another possible breach of the duty of fairness is "unreasonable or inordinate" delay.<sup>21</sup> The Commission, citing the Supreme Court of Canada, has confirmed that:

delays in administrative proceedings may impact the legality of those proceedings in two circumstances: first, if the nature of the delay created procedural unfairness by impeding the ability of an affected party to fairly make their case; and second, when this does not occur, but an inordinate delay causes significant prejudice, in such a way as amount to an abuse of process.<sup>22</sup>

Factors considered in the context of delay as abuse of process include: the time taken compared to the inherent time requirements of the matter; the cause of the delay, including whether the administrative body

used as efficiently as possible those resources it had available; and the impact of the delay, including harms caused by the ongoing delay.<sup>23</sup>

In the interests of regulatory certainty and its public interest mandate, the Commission has established indicative categories of application processing with performance standards for processing timelines.<sup>24</sup> As noted in the AUC's 2021-2022 Report Card, a core challenge the AUC wishes to address in its processes is "How can the AUC ensure its regulatory processes are clear, timely and appropriate, so as not to impose unnecessary regulatory burden, while ensuring the public interest is protected?".<sup>25</sup>

In considering the Applications in light of the Pause, the Commission should establish, to the greatest extent it is able to do so within the legislatively imposed framework, a process which is anticipated and predictable, which conforms to Aira's legitimate expectations, and which does not represent unreasonable delay.

Aira designed the Project in accordance with all existing rules and regulations. A public hearing was held to consider the Project and its Applications were deemed complete. It appears that Aira is the only project of those directly impacted that is this advanced in the AUC regulatory process and thereby most negatively impacted by the Government's announcement. **Any modifications that are implemented and enforced against the Project will amount to a reversal or change of the regulatory rules that we invested in and followed in good faith.**

Aira raises the principles of procedural fairness and regulatory certainty in light of the significant prejudice Aira will suffer as a result of the Pause and consideration of both support this submission. Aira submits that the process set out below is in the public interest in this instance and respectfully requests that the Commission implement the Pause as outlined in this submission.

#### **Implementing the Pause**

In the AUC Letter, the AUC advised that it was seeking feedback on the following options for implementing the Pause:

- **Complete abeyance:** The AUC does not accept new applications during the pause period and all existing excluded applications will be placed in abeyance during the pause period with the AUC taking no further steps to complete their record or issue decisions.
- **Partial abeyance:** The AUC does not accept new applications during the pause period. For all existing applications with an incomplete record, the AUC process will proceed to the point where the written evidence is complete, applications will then be placed in abeyance until the pause period expires. The AUC will not hold any public hearings for these applications during the pause period. Existing applications with a complete record will be placed in abeyance until the pause period expires;
- **Approval hold only:** The AUC continues to fully process new and existing excluded applications without issuing any approvals until after the pause period; and
- **Other:** Any other proposals for implementing the approval pause are also welcome.<sup>26</sup>

As noted above, Aira has suffered significant prejudice from the decision of the Government to enact the Regulation. This prejudice is especially apparent when considering that the only process step remaining for the Project is to receive a decision on the Applications from the Commission. Additionally, the Background



Topics considered to be of importance to the Government and the Commission for the Inquiry do not apply to the Project: it is located on low quality agricultural land; it is a low-profile solar facility and visual impacts were thoroughly considered during the Proceeding (and no landowner with a home located near the Project raised concerns); and the Project has implemented comprehensive reclamation security requirements in its landowner land leases.

Aira respectfully submits that the Commission should only hold issuing power plant approvals as required by the Regulation. The Commission should continue to issue decisions on renewable energy power plant applications, including the Applications. Continuing to issue decisions in the ordinary course would provide much needed certainty to CIP, Aira and other project proponents impacted by the Pause that, if a favourable decision is issued by the Commission, a power plant approval will be forthcoming after the expiration of the Pause. This would in turn allow for further investment decisions to be made related to the 2024 construction season, including with respect to equipment procurement and construction employment.

As noted above and throughout the record of the Proceeding, the Project was thoughtfully designed to comply with the regulatory requirements currently in force. A decision on the Applications was due to be issued no later than September 20, 2023 (less than five weeks from today). To require the Project to comply with regulatory requirements that are currently unknown and may not be in force until well after the expiration of the Pause would be categorically unfair. Furthermore, the regulatory delay places undue burden on the project economics, placing investment and jobs in jeopardy. The principles of procedural fairness and regulatory certainty demand that the Project be subject only to those requirements that are currently in force. Aira respectfully requests that, regardless of the way in which the Commission chooses to implement the Pause from a procedural standpoint, the Commission confirm the Project will not be subject to any new regulatory requirements that arise from the Inquiry.

Finally, Aira respectfully requests that the Commission confirm that all applications that were impacted by the Pause will be processed in the same order that they would have been had the Pause not been implemented. It would be counter to the principles of procedural fairness for an application that was less advanced at the time of the Pause to be disposed of by the Commission prior to an application that was further along in the process at the time of the Pause, such as the Project.

#### **Results of the Inquiry**

With respect to the Inquiry, Aira notes that the Backgrounder is inconsistent as to the timing of the expiration of the Regulation and the submission of the Commission's report that includes the findings and recommendations based on the Inquiry ("Inquiry Report"). The Regulation is set to expire on February 29, 2024.<sup>27</sup> However, the Inquiry Report is not required to be submitted to the Government until March 29, 2024, at the latest.<sup>28</sup> This inconsistency with respect to timing could potentially create further uncertainty for renewable energy power plant approvals. As such, Aira respectfully requests that the Commission commit to submitting the Inquiry Report to the Government on or before the same date as the expiration of the Regulation, being February 29, 2024.

#### **Conclusion**

Implementing the Pause as described herein would provide some certainty to CIP and Aira that the Aira Project will be able to proceed as planned upon the expiration of the Regulation. CIP and Aira have expended a significant amount of time, effort and capital to progress the Project to this point in accordance with the laws and policies currently in existence. Further delay and uncertainty related to the Pause could jeopardize the Project and all of the benefits it will bring to Alberta, both economic and environmental. The Alberta public will not be served by completely halting the consideration of renewable energy power plant projects that will spur significant investment and much needed greenhouse gas emissions reduction.

As such, Aira respectfully requests that the Commission implement the Pause in a manner that reflects Aira's submissions herein; namely, that the Commission will continue to process existing applications and issue decisions.

Should you have any questions or require any additional information, please do not hesitate to contact the undersigned.

Sincerely,

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Dear AUC Members,



I am writing as a concerned Albertan resident in response to your stakeholder feedback request, dated August 3, 2023<sup>1</sup>. **I respectfully request that the AUC end the pause and immediately recommence approvals for renewable energy projects greater than 1MW.** I believe the decision to pause renewable projects of greater than 1MW<sup>2</sup> is unnecessary, will threaten thousands of jobs, will increase electricity costs for all ratepayers, will stifle billions of dollars in investment, and will slow efforts to address climate change. Alberta is the solar powerhouse of Canada, and we need to maintain our competitive edge.

I understand that you have a number of concerns you are seeking to address<sup>3</sup>:

- With respect to **land reclamation** concerns, please note that solar sites will remain viable well past the end of life of the original panels, and this will significantly reduce land reclamation needs. Additionally, The Government of Alberta already has reclamation [Guidelines for Renewable Energy Operations](#) which address this matter.
- With respect to **end of life** concerns for renewable energy infrastructure disposal, the Alberta Recycling Management Authority (ARMA) is already piloting reuse and recycle programs for solar PV. Given that the majority of solar being installed today will be in operation for well over 25 years, ARMA is really out ahead on this matter.
- With respect to **land use** concerns, such as food security, wetland preservation and wildlife conservation, Solar Alberta has already created highly relevant Solar Siting Recommendations: <https://solaralberta.ca/solar-siting-recommendations/>. I believe you could review and adopt protocols such as these without a pause on approvals.

If the Government of Alberta and the AUC are unwilling to immediately end the pause, I respectfully request that you continue to fully process new and existing excluded applications without issuing any approvals until after the pause period (Option 3 in your announcement).

Thank you for considering my request.

Sincerely,

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Dear AUC Members,

A am writing as a concerned Albertan in response to your stakeholder feedback request, dated August 3, 2023<sup>1</sup>. I respectfully request that the AUC end the pause and immediately recommence approvals for renewable energy projects greater than 1MW. I believe the decision to pause renewable projects of



greater than 1MW<sup>2</sup> is unnecessary, will threaten thousands of jobs, will increase electricity costs for all ratepayers, and will stifle tens of billions of dollars in investment. Alberta is the solar powerhouse of Canada, and we need to maintain our competitive edge.

I understand that you have a number of concerns you are seeking to address:

With respect to land reclamation concerns, please note that solar sites will remain viable well past the end of life of the original panels, and this will significantly reduce land reclamation needs. Additionally, The Government of Alberta already has reclamation Guidelines for Renewable Energy Operations which address this matter.

With respect to end of life concerns for renewable energy infrastructure disposal, the Alberta Recycling Management Authority (ARMA) is already piloting reuse and recycle programs for solar PV. Given that the majority of solar being installed today will be in operation for well over 25 years, ARMA is really out ahead on this matter.

With respect to land use concerns, such as food security, wetland preservation and wildlife conservation, Solar Alberta has already created highly relevant Solar Siting Recommendations: <https://solaralberta.ca/solar-siting-recommendations/>. I believe you could review and adopt protocols such as these without a pause on approvals.

I am disappointed that all the options were for some amount of pause because it really isn't needed. However, if the Government of Alberta and the AUC are unwilling to immediately end the pause, I respectfully request that you continue to fully process new and existing excluded applications without issuing any approvals until after the pause period (Option 3 in your announcement).

Thank you for considering my request.

Sincerely,

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I am writing as a concerned Albertan resident in response to your stakeholder feedback request, dated August 3, 2023<sup>1</sup>. **I respectfully request that the AUC end the pause and immediately recommence approvals for renewable energy projects greater than 1MW.** I believe the decision to pause renewable projects of greater than 1MW<sup>2</sup> is unnecessary, will threaten thousands of jobs, will increase electricity costs for all ratepayers, will stifle billions of dollars in investment, and will slow efforts to address climate change. Alberta is the solar powerhouse of Canada, and we need to maintain our competitive edge.

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- With respect to **end of life** concerns for renewable energy infrastructure disposal, the Alberta Recycling Management Authority (ARMA) is already piloting reuse and recycle



# AUC

Alberta Utilities Commission

programs for solar PV. Given that the majority of solar being installed today will be in operation for well over 25 years, ARMA is really out ahead on this matter.

- With respect to **land use** concerns, such as food security, wetland preservation and wildlife conservation, Solar Alberta has already created highly relevant Solar Siting Recommendations: <https://solaralberta.ca/solar-siting-recommendations/>. I believe you could review and adopt protocols such as these without a pause on approvals.

If the Government of Alberta and the AUC are unwilling to immediately end the pause, I respectfully request that you continue to fully process new and existing excluded applications without issuing any approvals until after the pause period (Option 3 in your announcement).

Thank you for considering my request.

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If the Government of Alberta and the AUC are unwilling to immediately end the pause, I respectfully request that you continue to fully process new and existing excluded applications without issuing any approvals until after the pause period (Option 3 in your announcement).

Thank you for considering my request.

Sincerely,

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I understand that you have a number of concerns you are seeking to address:

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If the Government of Alberta and the AUC are unwilling to immediately end the pause, I respectfully request that you continue to fully process new and existing excluded applications without issuing any approvals until after the pause period (Option 3 in your announcement).

Thank you for considering my request.

Sincerely,

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## RE: Stakeholder Input on Approval Pause for Renewable Energy Projects (“Approval Pause”)

In the August 3, 2023, announcement<sup>1</sup> (“Announcement”) by the Alberta Utilities Commission (“AUC”), of the Approval Pause, stakeholders were invited to provide their preference regarding how the AUC should proceed with applications during the Approval Pause that will be in place until February 29, 2024. Diode Ventures, LLC (“Diode”) strongly prefers that the AUC continue to fully process new and existing applications during the Approvals Pause. In the context of Diode’s project, it submits that this is the only fair and efficient way to proceed.

Diode is a global solar project developer with a 450-megawatt project under development in Alberta, under the ownership of our wholly owned subsidiary, Kinbrook Solar, LP (“Kinbrook Solar”). While the Announcement indicates that the Approval Pause is intended for a more systematic approach to the impact of solar generation projects on viewscales, future reclamation, and Crown lands raised by municipalities and landowners related to responsible land use, Kinbrook Solar has already worked to address and mitigate these concerns where applicable to its project. Its project has been the product of years of collective effort amongst many stakeholders and with the input of numerous environmental, land, and engineering experts.

Kinbrook Solar’s project is to be undertaken on private lands owned by the Eastern Irrigation District (“EID”). EID is a very large holder of land across southeastern Alberta, owning or impacting over a quarter million acres. They have been a strong partner through the project’s interconnection process and are eager for the benefits of a solar plant on their land in our application area.

To the extent that the issues to be addressed in the AUC Inquiry may be relevant to Kinbrook Solar, they are already being addressed. First, Kinbrook Solar has been cited far from the land boundaries to minimize impacts to the neighbors. Based on the results of the solar glare assessment, Kinbrook Solar will blend into the horizon when greater than 100 meters from the site: our area is very flat, with no significant high points in range from which to view the project. Second, reclamation has been discussed extensively with the landowner, resulting in an agreed-upon letter of credit—thus ensuring that EID will never be without the means to reclaim its land back to their current, natural state, after the viable project lifespan many decades in the future. Finally, Kinbrook Solar will be developed outside of defined Crown lands and cultivated lands, sited to minimize impacts to habitat and wildlife.



Kinbrook Solar and other project developers and landowners would be unfairly impacted if any other action is taken by the AUC other than an Approval Hold Only. Significant investments in siting, engineering, and procurement could be put at risk by the Approval Pause. The AUC can mitigate this risk by only holding approvals, while continuing to process new and existing applications.

Kinbrook Solar was days away from submitting its Power Plant Application (“PPA”) to the AUC at the time of the Announcement, with considerable work and expense put into updating our application and studies required for our submission. Kinbrook Solar is in Stage III of the AESO interconnection process and would be deeply and unfairly impacted by the Approval Pause if it caused a six-month delay to the processing of its PPA. In addition, as required by the AESO interconnection process, we have submitted our Generating Unit Owner’s Contribution (“GUOC”) in the form of a letter of credit (“LC”). While waiting for the Announcement feedback period to end and a resolution of such unprecedented pause in PPA approvals, we will be incurring expenses for that LC. Given the extensive amount of work performed to minimize impacts for which this pause is intended to address, we think the Approval Hold Only is the fairest and most efficient approach for both project developers, as well as landowners and other stakeholders who may be depending on the income from pending projects.

We appreciate this opportunity to provide feedback on the Approval Pause and welcome any additional opportunities to clarify or add to the conversation where requested.

Sincerely,

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Dear Members of the Alberta Utilities Commission:

I am writing on behalf of Invinity Energy Systems, a Canadian energy storage manufacturer that has recently deployed an 8 MWh battery array as part of the Chappice Lake Solar and Storage Project in Alberta. In response to your stakeholder feedback request dated August 3, 2023, we wish to express our wholehearted support for the immediate resumption of approvals for renewable energy projects exceeding 1MW.

As a dedicated participant in Alberta's energy landscape, we firmly believe that continued development of renewable generating capacity is integral to establishing a resilient and cost-effective energy supply for Alberta's energy consumers. Furthermore, the growth potential of direct corporate offtake agreements within Alberta's low-carbon electricity sector is considerable and merits support particularly as this could represent a significant growth industry for the province. A stable and predictable regulatory framework is pivotal in transforming the renewable energy industry into a cornerstone of Alberta's thriving future economy.

Grounded in these principles, we ask that the Alberta Utilities Commission be authorized to restart the approval process for new renewable projects immediately. By doing so, we believe Alberta will harness its full potential as a renewable energy leader, driving economic growth and environmental progress.

In addressing specific concerns that the Alberta Utilities Commission aims to tackle, we wish to contribute the following insights:

- **Intermittency:** In the near-term the AUC should implement rules that support the close-coupling of longer duration (4h+) energy storage projects with renewable generation, for example by prioritizing interconnection queues for such projects and eliminating off-peak demand charges for charging on-site energy storage from the grid. In the medium term the AUC should work to develop a market-based mechanism for compensating long duration energy storage as a dedicated balancing mechanism.
- **Land Reclamation:** The longevity of solar sites extends far beyond the operational lifespan of their original panels, considerably reducing the need for extensive land reclamation efforts. We also acknowledge the Government of Alberta's existing reclamation guidelines for Renewable Energy Operations, which can effectively address this concern. Meanwhile, reclamation/decommissioning bonds can be appropriate and continuously reviewed in accordance with the rapid development and progression of the solar PV and wind turbine recycling industry.
- **End-of-Life Infrastructure:** The Alberta Recycling Management Authority's (ARMA) initiatives to introduce reuse and recycle programs for solar PV infrastructure are a commendable step towards sustainable resource management. These efforts, coupled

with the prolonged operational life of most solar installations, demonstrate a proactive approach to tackling end-of-life challenges.

- **Land Use:** We recognize the significance of land use considerations, such as food security, wetland preservation, and wildlife conservation. The Solar Siting Recommendations outlined by Solar Alberta (<https://solaralberta.ca/solar-siting-recommendations/>) provide valuable guidance for sustainable decision-making, underscoring the feasibility of informed project approvals without necessitating a pause.

If an immediate end to the pause is not feasible, we respectfully urge you to continue the thorough processing of new and existing excluded applications without granting approvals until the pause period concludes (Option 3 in your announcement).

In closing, we extend our sincere gratitude for your attention to these crucial matters. Thank you for your unwavering dedication to Alberta's energy future.

Warm regards,

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Good morning,

As a stakeholder in the health of our country, I would like to write in favour of the *Approval hold only* option. Since the province continues to move ahead on approving new fossil fuel projects, I see no reason why it has to slow down projects which develop renewable energy.

Renewables play an important role in transitioning away from the fossil fuels which contribute to global warming and its consequences. As this summer has shown, the consequences are already upon us.

Sincerely,

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Dear AUC Members,

I am writing as a concerned Albertan resident in response to your stakeholder feedback request, dated August 3, 2023<sup>1</sup>. **I respectfully request that the AUC end the pause and immediately recommence approvals for renewable energy projects greater than 1MW.** I believe the decision to pause renewable projects of greater than 1MW<sup>2</sup> is unnecessary, will threaten thousands of jobs, will increase electricity costs for all ratepayers, will stifle billions of dollars in investment, and will slow efforts to address climate change. Alberta is the solar powerhouse of Canada, and we need to maintain our competitive edge.

I understand that you have a number of concerns you are seeking to address<sup>3</sup>:

- With respect to **land reclamation** concerns, please note that solar sites will remain viable well past the end of life of the original panels, and this will significantly reduce land



# AUC

Alberta Utilities Commission

reclamation needs. Additionally, The Government of Alberta already has reclamation [Guidelines for Renewable Energy Operations](#) which address this matter.

- With respect to **end of life** concerns for renewable energy infrastructure disposal, the Alberta Recycling Management Authority (ARMA) is already piloting reuse and recycle programs for solar PV. Given that the majority of solar being installed today will be in operation for well over 25 years, ARMA is really out ahead on this matter.
- With respect to **land use** concerns, such as food security, wetland preservation and wildlife conservation, Solar Alberta has already created highly relevant Solar Siting Recommendations: <https://solaralberta.ca/solar-siting-recommendations/>. I believe you could review and adopt protocols such as these without a pause on approvals.

If the Government of Alberta and the AUC are unwilling to immediately end the pause, I respectfully request that you continue to fully process new and existing excluded applications without issuing any approvals until after the pause period (Option 3 in your announcement).

Thank you for considering my request.

Sincerely,

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Dear AUC Members,

I am writing as a concerned Albertan resident in response to your stakeholder feedback request, dated August 3, 2023<sup>1</sup>. **I respectfully request that the AUC end the pause and immediately recommence approvals for renewable energy projects greater than 1MW.** I believe the decision to pause renewable projects of greater than 1MW<sup>2</sup> is unnecessary, will threaten thousands of jobs, will increase electricity costs for all ratepayers, will stifle billions of dollars in investment, and will slow efforts to address climate change. Alberta has the opportunity to be a global leader in the renewables space, which has now been threatened by this moratorium.

I understand that you have a number of concerns you are seeking to address<sup>3</sup>:

- With respect to **land reclamation** concerns, please note that solar sites will remain viable well past the end of life of the original panels, and this will significantly reduce land reclamation needs. Additionally, The Government of Alberta already has reclamation [Guidelines for Renewable Energy Operations](#) which address this matter.
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If the Government of Alberta and the AUC are unwilling to immediately end the pause, I respectfully request that you continue to fully process new and existing excluded applications without issuing any approvals until after the pause period (Option 3 in your announcement).

Thank you for considering my request.

Sincerely,

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Dear Ms. Dahl Rees:

**RE: AUC inquiry and pause on approvals for affordable, reliable renewable electricity**

This is a response to the Alberta Utilities Commission's August 3, 2023 Announcement regarding the pause on power plant approvals and the Commission's forthcoming inquiry on electricity development in Alberta. In that Announcement, the Commission requested input on options for the Commission's processing of power plant applications during the approvals pause period.

This response is on behalf of the Pembina Institute, a national clean-energy think tank and charity headquartered in Alberta and founded in Drayton Valley, that advocates for strong, effective policies to enable Canada's clean energy transition in a manner that supports communities, the economy, and a safe climate. In the electricity sector, the Institute's research and other work has focused on seeking solutions to decarbonize and diversify the grid in a way that fosters a resilient, reliable, and affordable electricity system.

After setting out the Institute's clear and demonstrable interest in this inquiry, we explain why the proposed Approval Hold Only option is the most appropriate, from both a procedural fairness and public policy perspective. We further offer recommendations on an expedited and module-based approach to the inquiry.

**Pembina Institute's Interest in the Inquiry**

Since its establishment in 1984, the Pembina Institute has advocated for appropriate and responsible development of all energy resources. As an example, in 2010 we wrote a guide for landowners on wind project development.<sup>1</sup> Our work has also included developing resources for landowners dealing with solar projects and oil and gas activities on their lands. We recognize

that, like all types of energy development, potential impacts of renewable energy projects should be minimized and mitigated.

### **Pembina Institute Supports Approval Hold Only**

The Pembina Institute recommends that the Commission adopt the “Approval hold only” option to fully process all new and existing applications during the Pause period. This option is the most procedurally fair and most aligns with sound regulatory policy. Fundamentally, we agree with others<sup>2</sup> that these concerns do not necessitate a 7-month pause on project approvals.

Such a pause is unprecedented and creates substantial investor uncertainty in Alberta and puts substantial investment and jobs at risk. Alberta has held inquiries and hearings about energy development issues but has never implemented a pause of this nature while that review is taking place. Decarbonizing the electricity system is an essential part of addressing climate change, as low-carbon electricity plays a critical role as an input into a vast array of low-carbon goods and services that are increasingly in demand in the global marketplace. Delays in reducing the carbon intensity of electricity produced in Alberta is not in the public interest.

### **Expedited and Module-based Approach to the Inquiry**

We further recommend that the Commission work with the Ministry of Affordability and Utilities to clarify and provide more certainty on when the Commission will resume making final decisions on power plant applications. The regulation directing the approvals pause expires on February 29, 2024.<sup>3</sup> However, the Commission’s Inquiry report is due one month later, on March 29, 2024, and presumably the Ministry of Affordability and Utilities will need more time to review the Commission’s report and decide what if any new or revised policies are needed and to develop and implement those policies. This timeline suggests that the government will extend the pause on approvals during these reporting and policy development phases, creating further uncertainty for developers and investors.

The Institute recommends the Commission commit to completing and publishing the inquiry report by December 31, 2023 to minimize the disruption to the sector. Moreover, we submit that a number of issues identified in the terms of the inquiry can be resolved more quickly than others. We recommend that the Commission coordinate the inquiry such that issues that can be more quickly resolved are expedited.

There are eight projects representing 1.3 GW of capacity in the AESO Cluster 1 Assessment process with Preliminary Assessment Packages to be issued by December 31, 2023. These projects' proponents will need certainty in subsequent regulatory procedures before making further investment and development decisions. In addition to these eight projects and the 15 projects currently awaiting Commission approval affected by the pause, there are almost 100 other projects in development – according to the AESO – that may seek an approval in the 7-month period.

### **Concluding Remarks**

While beyond the scope of this response, the Pembina Institute joins with others in recommending that the pause be lifted and that the government (including the Commission and the Ministry of Affordability and Utilities) address concerns through existing regulatory processes and ongoing policy development. We are encouraged that, on August 1, the AESO began the Market Pathways process to explore a system evolution to address some of the issues of concern. Alberta is at a crossroads where the province can choose to transform the electricity system to provide low-carbon, flexible, reliable, and affordable electricity to all Albertans. We are asking the Government of Alberta to reconsider the approvals pause mandate.

In the meantime, and for the reasons set out above, we recommend that the Commission adopt the "approval hold only" process which is the most procedurally fair and productive during the approvals pause period.

Yours sincerely,

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Hello,

I understand that today is the deadline for providing feedback about the pause on renewable energy development for wind and solar projects over 1 Megawatt until February 2024. I have not been able to find the place to provide that feedback so hope that you can forward this to the appropriate address before the deadline.

- Firstly, I encourage you to extend the deadline for feedback as this seems a very short window, especially for summertime when many are on vacation.
- Secondly, I applaud your plan to review how energy development is affecting agricultural land but I am far more concerned about how much agricultural land is lost to other commercial ventures (such as shopping malls) and low density suburban housing development.
- Thirdly, I do not support putting a pause on the renewable energy industry - climate change is a very serious problem and moving towards renewable energy should be a priority. This is apparently a growing industry in Alberta, providing jobs and economic strength. Putting a significant pause on development for several months can have many unintended consequences in stalling out the growth of this industry that is working to move us away from fossil fuels.

Thank you for your attention to this matter,

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Dear AUC Members,





I am writing as a resident of Alberta in response to your stakeholder feedback request, dated August 3, 2023.

As a young adult looking at the world today, it baffles me that the government that is supposed to represent me and the best interests of their citizens could pause any approvals for renewable energy projects. A few days ago I saw news of the Maui fires, decimating the island and home of thousands of people. Yesterday I saw news of the fires in the Northwest Territories leading the evacuation of Yellowknife and has the potential to burn the city. Today I saw news of the fires in Kelowna, with 200ft flames and embers jumping across lakes leading to even more danger for the residents. Within a single week we have seen unprecedented destruction of our cities, the environment, and the planet due to climate change. There is no reason to believe that Alberta will be the sole place immune to these dangers. To do anything to hinder our efforts to move toward renewable energy projects is to condemn myself and every other young Albertan to a future of fires, droughts, and floods, all of increasing severity.

**I request that the AUC end the pause and immediately recommence approvals for renewable energy projects greater than 1MW.** I believe the decision to pause renewable projects of greater than 1MW is unnecessary, will threaten thousands of jobs, will increase electricity costs for all ratepayers, will stifle billions of dollars in investment, and will slow efforts to address climate change. Alberta is the solar powerhouse of Canada, and we need to maintain our competitive edge.

I understand that you have a number of concerns you are seeking to address:

With respect to land reclamation concerns, please note that solar sites will remain viable well past the end of life of the original panels, and this will significantly reduce land reclamation needs. Additionally, The Government of Alberta already has reclamation Guidelines for Renewable Energy Operations which address this matter.

With respect to end of life concerns for renewable energy infrastructure disposal, the Alberta Recycling Management Authority (ARMA) is already piloting reuse and recycle programs for solar PV. Given that the majority of solar being installed today will be in operation for well over 25 years, ARMA is really out ahead on this matter.

With respect to land use concerns, such as food security, wetland preservation and wildlife conservation, Solar Alberta has already created highly relevant Solar Siting Recommendations: <https://solaralberta.ca/solar-siting-recommendations/>. I believe you could review and adopt protocols such as these without a pause on approvals.

If the Government of Alberta and the AUC are unwilling to immediately end the pause, I respectfully request that you continue to fully process new and existing excluded applications without issuing any approvals until after the pause period (Option 3 in your announcement).

Thank you for considering my request.

Sincerely,

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# AUC

Alberta Utilities Commission

**Re: Alberta Utilities Commission ("AUC")  
August 3, 2023 AUC announcement of launch of inquiry and approval pause of  
sixth months for new renewable electricity generation ("Announcement")  
Westbridge Renewable Energy Corp. ("Westbridge") and MYTILINEOS Energy &  
Metals ("MYTILINEOS") Joint Response**

On August 3, 2023, the AUC issued the Announcement and requested stakeholder feedback on the three options summarized below to implement the Alberta Government's decision to pause approvals for new renewable electricity generation. Please accept Westbridge's and MYTILINEOS<sup>1</sup> comments as outlined below.

- **Complete abeyance:** The AUC does not accept new applications during the pause period and all existing applications are placed in abeyance during the pause period.
- **Partial abeyance:** The AUC does not accept new applications during the pause period, but processes all existing applications with an incomplete record to the point where the written evidence is complete, at which point these applications are placed in abeyance until the pause period expires. No public hearings are held for these applications.
- **Approval hold only:** The AUC continues to fully process new and existing applications without issuing any approvals until after the pause period.

Westbridge and MYTILINEOS are publicly traded companies focused on developing, investing in, and building utility-scale solar PV facilities in Alberta. Together, we have invested millions in Alberta to date and our future growth plans in Alberta are continued investment in the province and creating jobs for Albertans.

Among the listed options, Westbridge and MYTILINEOS are supportive of the "Approval hold only" option. This option allows the AUC to continue to accept, and process in the normal course, new and existing renewable electricity generation applications. Under the "Approval hold only" option, only approvals would not be issued until after the pause period. The "Approval hold only" option will prevent a probable backlog in the processing of such applications once the approval pause is lifted, consistent with the AUC's ongoing efforts to improve efficiency and reduce regulatory burden.<sup>2</sup>

If the AUC adopts one of the other listed options, i.e., either "Complete abeyance" or "Partial abeyance," or variations thereof, Westbridge and MYTILINEOS are concerned with substantive project approval delays, and with the potential implications of these delays to System Access Service Requests ("**SASRs**") that are underway before the Alberta Electricity System Operator ("**AESO**"). Where the AESO determines that a SASR will require the addition or alteration of facilities on Alberta's transmission system, that SASR cannot move past stage 3 of the AESO's connection process until the generator files the SASR's associated power plant facility application with the AUC.

Westbridge is a Calgary-based renewable energy company focused on originating and developing utility-scale solar and energy storage projects and currently have five projects in various stages of the AESO interconnection process; therefore, Westbridge is also concerned with the impact of substantial approval delays to project funding opportunities. For instance, based on the anticipated process timelines for the AESO's newly implemented "cluster assessment" for connection projects, approval delays could result in generators being required to post evidence of Generating Unit Owner's Contribution ("**GUOC**") before obtaining a power plant approval.

For MYTILINEOS, this is its first transaction in North America, following its international strategy to seek opportunities in countries with high commercial interest and business-friendly environments. MYTILINEOS' rationale for investing in Alberta is driven, among other reasons, by the fact that the Province of Alberta has established a streamlined permitting process which favours appropriate planning and predictability. MYTILINEOS has budgeted an investment of CAD \$1.7 Billion (EUR 1.16B) to complete the construction of Westbridge's five Alberta projects (two have already received AUC approval). Besides the economic investment in Alberta, these projects will create important temporary and permanent jobs in the Province as well as contribute to Alberta's effort to achieve carbon-neutral power grid by 2050. Both Westbridge and MYTILINEOS pledge to work together with AUC, as well as the other involved stakeholders, to make sure that the recent Announcement is solved satisfactorily to avoid creating any unnecessary uncertainty in

Based on the foregoing, Westbridge and MYTILINEOS believe that the "Approval hold only" option represents the best pathway forward to reduce project approval delays and ensure that Alberta continues to attract much needed investment in the province's renewable electricity market.

Westbridge and MYTILINEOS appreciate the opportunity to provide comments on options to the pause period on approvals for new renewable electricity generation.

Yours truly,

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We are XXXXXXXXX and own land in the Northern Valley where a wind project is being proposed. I would like to make known, as a stakeholder, that it is necessary that a "complete abeyance" be enacted in order to properly review the entire regulatory application process. My legal representation, Willms & Shier, has explained our rationale, which I have attached to this email.

We do not approve of the project in our area--- too close to residence, farm livestock and will disrupt wildlife eco system. Why don't they put them at least 40km from residences or by cities if they think no harm will be done?

Airplanes and rockets cause more environmental damage that affects our "climate change".

Sincerely,

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# AUC

Alberta Utilities Commission

**Re: Six-Month Approvals Pause Feedback - Northern Valley Families Support a Complete Abeyance of Approvals for New Renewable Electricity Generation**

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Willms & Shier Environmental Lawyers LLP is environmental legal counsel to approximately 50 families in Northern Valley, Alberta. Our clients reside immediately adjacent to the Northern Valley Wind Project currently proposed by Elemental Energy.

We understand that the Alberta Utilities Commission (the "AUC") is seeking stakeholder feedback about its implementation of a six-month moratorium on approvals for new renewable electricity generation.

For the reasons outlined below, our clients respectfully submit that a six-month complete abeyance of approvals is appropriate during which time the AUC:

- 1 does not accept new applications,
- 2 places all existing excluded applications on hold, and
- 3 takes no further steps to complete their record or issue decisions.

### **COMPLETE ABEYANCE OF APPROVALS NECESSARY FOR PROCESS RE-EVALUATION**

Our clients strongly support a review of the entire AUC approvals process. This includes addressing issues spanning from the signing of lease options before public consultation, to the lack of input from communities on Alberta Environment and Protected Area environmental reports, through to the AUC's mandate and its applicable test for granting approvals.

Given the ongoing re-evaluation of the entire AUC process, our clients' view is that a complete abeyance of approvals during the six-month moratorium is the most appropriate course of action.

The alternate options being considered by the AUC, including a partial abeyance or a hold on issuing approvals until after the moratorium, are not consistent with the purpose of the AUC process review. Under these options, if the public inquiry leads to changes in the AUC approvals process, existing applications would likely have to be resubmitted and reviewed again at significant time and financial expense to all parties involved. Similarly, existing projects in the pre-AUC application phase may be preparing materials based on a set of requirements that may change.

### **COMPLETE ABEYANCE REQUIRED FOR PROCEDURAL FAIRNESS**

Taking any approach other than a complete abeyance during the review process would, in our view, also breach the principles of procedural fairness and legitimate expectation.

The Supreme Court of Canada in *Baker v Canada (Minister of Citizenship & Immigration)* set out guiding principles as follows:<sup>1</sup>

... if a legitimate expectation is found to exist, this will affect the content of the duty of fairness owed to the individual or individuals affected by the decision. If the claimant has a legitimate expectation that a certain procedure will be followed, this procedure will be required by the duty of fairness: . . . . Nevertheless, the doctrine of legitimate expectations cannot lead to substantive rights outside the procedural domain. This doctrine, as applied in Canada, is based on the principle that the "circumstances" affecting procedural fairness take into account the promises or regular practices of administrative decision-makers, and that it will generally be unfair for them to act in contravention of representations as to procedure, or to backtrack on substantive promises without according significant procedural rights. [Emphasis added, portions of the quoted paragraph and citations omitted.]

*Schwarz Hospitality Group Ltd. v. Canada (Minister of Canadian Heritage)*<sup>2</sup> followed *Baker* and presents a cautionary take for administrative decision-makers in the midst of a moratorium.

In *Schwarz*, the Minister of Canadian Heritage imposed a one-year development moratorium for certain types of development in Banff National Park for the purpose of reviewing the guidelines applicable in the circumstances. Notwithstanding the moratorium, Officials at Parks Canada continued to consult with a developer about an existing development proposal.

This ongoing consultation – akin to the partial abeyance options being considered by the AUC – resulted in the developer successfully bringing a *mandamus* order against Parks Canada requiring Parks Canada to adjudicate on the developer's proposal in accordance with the original approval process and guidelines in place before the moratorium was implemented.

This outcome was entirely antithetical to the purpose of the moratorium.

### **CONCLUSION**

Our clients respectfully submit that a complete abeyance moratorium, rather than a partial one, is the best course of action to both:

- 1 permit all stakeholders and the AUC to start afresh under any revised AUC procedures, and
- 2 maintain consistency within the AUC's existing duty of procedural fairness.

Yours truly,

Dear AUC Members,

I am writing as a concerned Albertan resident in response to your stakeholder feedback request, dated August 3, 2023<sup>1</sup>. **I respectfully request that the AUC end the pause and immediately recommence approvals for renewable energy projects greater than 1MW.** I believe the decision to pause renewable projects of greater than 1MW<sup>2</sup> is unnecessary, will threaten thousands of jobs, will increase electricity costs for all ratepayers, will stifle billions of dollars in investment, and will slow efforts to address climate change. Alberta is the solar powerhouse of Canada, and we need to maintain our competitive edge.

I understand that you have a number of concerns you are seeking to address<sup>3</sup>:

- With respect to **land reclamation** concerns, please note that solar sites will remain viable well past the end of life of the original panels, and this will significantly reduce land reclamation needs. Additionally, The Government of Alberta already has reclamation [Guidelines for Renewable Energy Operations](#) which address this matter.
- With respect to **end of life** concerns for renewable energy infrastructure disposal, the Alberta Recycling Management Authority (ARMA) is already piloting reuse and recycle programs for solar PV. Given that the majority of solar being installed today will be in operation for well over 25 years, ARMA is really out ahead on this matter.
- With respect to **land use** concerns, such as food security, wetland preservation and wildlife conservation, Solar Alberta has already created highly relevant Solar Siting Recommendations: <https://solaralberta.ca/solar-siting-recommendations/>. I believe you could review and adopt protocols such as these without a pause on approvals.

If the Government of Alberta and the AUC are unwilling to immediately end the pause, I respectfully request that you continue to fully process new and existing excluded applications without issuing any approvals until after the pause period (Option 3 in your announcement).

Thank you for considering my request.

Sincerely,

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CanWest Solar Development Corp (“CanWest” or “we”) is writing to provide feedback and comments regarding the Alberta Utilities Commission (“AUC” or “Commission”) announcement of the upcoming inquiry into the ongoing economic, orderly, and efficient development of electricity generation in Alberta, as well as the proposed pause on approvals for power plants and hydro developments producing renewable electricity greater than one megawatt.

#### CanWest Background

CanWest is an early-stage developer in Alberta with local roots in the Edmonton area bringing a hometown understanding to the issues faced by landowners and their neighbors. We have a primary focus to make certain that all stakeholders in the area are well heard and considered in our project development.

CanWest has made significant strides to develop a portfolio in excess of 2,000 MWdc of early to mid-stage solar PV projects in Alberta, involving several local reputable advisors and consultants in the development process.

Several of the projects in CanWest’s portfolio are scheduled to file an AUC application in the next three months. The August 3<sup>rd</sup> announcement came as a surprise and shock to many players in the industry, and as a local developer in the solar PV space, this is of particular concern, given our timelines to enter the AUC permitting process and our plans for future development in Alberta.

#### Investment in Alberta

CanWest’s attraction to developing in Alberta was due to, among other things, the business-friendly environment and stable and predictable regulatory regime.

CanWest was formed to develop renewable energy projects up to the ‘ready to build’ stage, at which point the projects are sold to one of the many investment funds managed both locally in Canada and abroad. Alberta has been represented to fund investors as one of the main regions where the business-friendly environment and stable and predictable regulatory regime provides an incredible advantage.



### Pause Implementation

Regarding the implementation of the approval pause, we find none of the proposed options acceptable or necessary for an orderly change in AUC policy. The Commission has in many instances in the past, amended policy and regulations without resorting to what amounts to an almost eight-month moratorium on development and investment (between August 3<sup>rd</sup> and March 31, 2024). Expect developers and investors to significantly pull back on investment while the uncertainty of the moratorium exists.

We suggest that the Commission remove the pause and implement a well-defined and transparent process to implement any policy and regulatory changes, while maintaining constant consultation and communication with the industry and other stakeholders.

We would suggest that any renewable energy project with a current application proceeding with the AUC, as well as any project that submits a valid and deemed complete application before December 31, 2023, be grandfathered under the current regulation. We also suggest that the Commission publish, at the earliest opportunity possible, draft changes to policy and regulations in order to signal the intentions of the AUC and allow industry the chance to adjust plans and schedules accordingly.

We should also highlight that, like many of our peers, CanWest's approach to development has always been to work collaboratively and in good faith with local municipalities and communities to jointly address any concerns with proposed renewable energy facilities. We continue to have positive and constructive dialogue with the municipalities that host our solar projects, and we actively adjust projects design based on the feedback that we receive from the local community.

### Proposed Implementation Options

Alternatively, of the three approval pause implementation options presented, CanWest would prefer "*approval hold only*". This is the most balanced and reasonable approach of the three options, as it maintains a degree of fairness for the applications already in the AUC process as well as allow future applicants the opportunity to take steps to maturing their projects by entering the AUC proceeding process prior to waiting until March of next year.

This option will also presumably allow the AUC time to provide the new applicants with Information Requests and allow interveners and observers the opportunity to participate in the proceeding at an earlier stage. Secondly, the "*approval hold only*" option would allow the AUC to identify the proceedings that require a hearing process so that immediately following the lifting of the approval pause, a hearing could proceed, rather than waiting only until after February 29<sup>th</sup> to begin the approval process and adding significantly to the duration of the permitting process. Thirdly, the "*approval hold only*" option will prevent what we expect could be a backlog of applications submitted to the AUC at one time following the removal of the pause on February 29<sup>th</sup>, 2024.

We also believe that continuing to keep the window open for AUC applications would be less harmful to Alberta's international reputation as a safe place to invest and do business than a complete application and approval freeze. CanWest is progressing the developments in partnership with NextEnergy Group, a fund manager with more than USD \$3.7bn under management in renewables, that We have on-boarded

to provide capital as foreign investor in the province leveraging on the reputation of Alberta to be a safe and stable environment for business.

### Inquiry Topics

In addition to feedback on the implementation of the approval pause, we would also like to briefly comment on the five topics that the AUC has been directed to inquire into:

1. Considerations on development of power plants on specific types or classes of agricultural or environmental land.
  - We believe that to date, the Commission has taken a reasonable and balanced approach to the review of environmental concerns pertaining to renewable energy development by ensuring that all applications include a Referral Letter from Alberta Environment and Protected Areas (AEPA). Developers submit extensive surveys, studies and data for review by AEPA prior to a Referral Letter being issued. The rigorousness of these reviews is consistent with similar processes found in other jurisdictions.
  - In regard to development of solar on agricultural land, we would support policy that any project developed on prime farmland be required to include a comprehensive agricultural co-utilization plan. The solar industry in general is moving towards agri-voltaics, even absent regulatory requirements to do so.
  
2. Considerations of the impact of power plant development on Alberta's pristine viewscales.
  - Qualitative considerations pertaining to development, such as visual impacts, are difficult to formalize into strict policy. CanWest would be in support of powerplant submission requirements to include an assessment of visual impacts, such as photo simulations from sensitive viewscape locations.
  - We also would like to point out that solar facilities have several viable options to reduce visibility, including vegetative screening, berms, and fencing. CanWest is in early discussions with N.A.I.T. regarding research aimed at identifying best practices to insert solar plants within the existing landscapes.
  
3. Considerations of implementing mandatory reclamation security requirements for power plants.
  - Many renewable energy real estate options and leases, including those held by CanWest, contain language obligating facility owners to decommission at the end of project life.
  - We would be in support of a reasonable and formalized approach to reclamation security requirements for projects, provided these requirements are not duplications and therefore overly burdensome for industry, while at the same time protecting landowners and municipalities.
  - It should be noted that renewable energy projects, unlike oil and gas, do not suffer from a depleting resource and we therefore believe that renewable energy facilities will potentially continue to operate well beyond the estimated project life, subject to agreement by the landowner.

- CanWest also suggests that the formation of a “Renewables Reclamation Fund” be established through the implementation of a Tarriff due at time of sale of electricity and set aside for the potential of reclamation failure by some parties. Successfully reclaimed sites would be eligible for a refund of the Tarriff at the reasonable discretion of the AUC.

4. Considerations for development of power plants on lands held by the Crown in Right of Alberta.

- CanWest would be in support of a fair and transparent process of leasing Crown Lands for the purposes of renewable energy development, provided there is robust consultation process with local Municipalities and Indigenous communities.

5. Considerations of the impact the increasing growth of renewables has to both generation supply mix and electricity system reliability.

- CanWest is encouraged by the steps that the Alberta Electricity System Operator is taking to implement energy storage into the AIES (both co-located and stand-alone), as is currently on-going in several other jurisdictions to ensure a safe and smooth inclusion of intermittent generator systems. CanWest is currently in discussions with international partners to implement BESS within our projects.

We appreciate the opportunity to provide feedback on this important matter. We believe that a transparent process can lead to well-informed policy changes without the need to implement a moratorium on approvals.

CanWest is available to engage into a constructive discussion with the Commission, bringing its local experience gained in the solar PV sector and would like to thank you for the consideration of our comments, as we look forward to participating in the next round of industry consultations.

Sincerely,

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Thank you for the opportunity to provide feedback on the AUC renewable energy approvals pause. Neoen is a leading international independent power producer (IPP) of renewable energy with over 7GW of solar, wind and storage capacity in operation or under construction around the world. Neoen is a specialized IPP with a long-term vision that informs our strategy to produce renewable, competitively-priced energy, sustainably and on a large scale. We are aiming for more than 10 GW in operation or under construction by 2025.

Neoen has been present in Alberta for more than two years, building a local team and a strong knowledge of regulatory, technical and other aspects of renewable energy project development in the province. We launched construction of our first solar farm in Alberta (Fox Coulee Solar Project – 93MWdc) earlier this year, and are developing a portfolio of other renewable energy projects across the province.

Neoen is a member of the Canadian Renewable Energy Association (CanREA) and shares the concerns and comments expressed by the Association in their recent communications. Still, we appreciate the opportunity to provide our own feedback on the upcoming AUC Inquiry and implementation of the approval pause for new renewable electricity generation.

**Implementation of the Approval Pause**

Neoen recommends the AUC implement the “approval hold only” option and continue accepting and processing new applications during the pause period. This would allow developers to keep on working on their projects and submit applications to the AUC for revision, even though no approvals would be granted before the end of the pause.

Otherwise, there would be a risk of creating a bottleneck at the AUC level (on top of the likely bottleneck at the AESO level with the implementation of the new Cluster



Assessments) with a significant number of projects submitting their AUC Power Plant Application at the same time once the pause ends. This would provoke major delays on top of the ones already generated by the pause.

**Additional comments on the Inquiry**

Due to the approvals pause, we are currently in a period of great uncertainty. It is vital that the AUC address the concerns listed in the Inquiry scope set out in the order-in-council as soon as possible. In that respect, we strongly support CanREA's module-based approach to the inquiry, in an effort to derive solutions for the industry in a timely manner.

Indeed, some topics might be easier to consult on and agree than others. Getting partial clarifications on specific concerns such as reclamation or use of agricultural land during the Inquiry would help developers to incorporate the AUC's recommendations earlier in the design of their plants, their landowner agreements, and their stakeholder engagement programs; and would avoid unnecessary changes or amendments to the projects following the Inquiry. We hope to gain greater clarity on the AUC's expectations during the Inquiry and not have to wait until March 2024 to understand its outcomes.

Being the owner-operator of its own projects for 30-plus years, Neoen adopts a long-term vision in its development and engagement with landowners, communities, local authorities and regulatory bodies; and sees value in having a strong and widely supported regulatory framework for the development of renewable energy projects in Alberta. In that regard, Neoen is looking forward to providing feedback during the Inquiry and is committed to finding constructive solutions for the industry as soon as possible to bring back the needed level of certainty so we can continue to make significant investments in Alberta.

Thank you for the opportunity to provide feedback on this process. If you have any further comments or questions, please do not hesitate to contact me.

Sincerely,

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I completely oppose the moratorium on renewable energy projects.

Time is of the essence re: climate change. We just returned from a rather harrowing drive through B.C. So many places are in fire there and across Canada. Clearly we are in a climate crisis. Many in Canada and around the world are suffering. This will only worsen

Plus we are blessed with wind, sun and technical and business know-how in Alberta.

Reverse the decision!

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Green Cat Renewables Canada Corporation (GCR) is an engineering and environmental consultancy based in Alberta and are supporting a variety of renewable energy developers throughout the province to design and obtain regulatory approval for their renewable generation projects. GCR is not a project developer, and therefore does not have ownership of projects or applications; however, GCR is supporting developers with their applications, and have acted as expert witnesses before the AUC on specific matters being proposed for consideration in the inquiry.

Currently, the AUC is seeking stakeholder feedback on implementing the approval pause for applications, and how best to continue considering and processing applications in the wake of the provincial government's targeted delay to renewable development, while the inquiry is undertaken. The AUC has provided industry and stakeholders with three options for consideration:

- Complete abeyance – AUC does not accept new applications and takes no further steps to complete the record of submitted applications.
- Partial abeyance – The AUC does not accept new applications, but will process submitted applications to a point where the written evidence is complete.
- Approval hold only – The AUC continues to process new and submitted applications, but will not issue approvals.

For the following reasons, GCR recommends consideration of option three, approval hold only, to be the most effective option going forward.

#### Anticipated Processing Backlog

The provincial government has indicated that its targeted delay to development will only affect up to 15 projects; however, this omits any consideration of the effect on projects anticipated to be submitted to the AUC between now and February 29, 2024. Given the significant interest from both developers and communities looking to invest in renewables in Alberta, it would be expected that up to 90 projects in various stages of development will be negatively affected by this targeted delay.

Options one and two currently being considered by the AUC would limit or prohibit processing of existing applications and would prohibit new applications for renewable development from being filed and considered. In our opinion, this would likely result in a significant backlog of processing required for the renewable projects before the AUC currently, and all the new applications that would then be submitted on March 1, 2024.

The influx of new applications could overwhelm the AUC's ability to effectively and efficiently review and process applications, creating a backlog of application review that will affect all facility applications before the AUC. This delay would certainly affect renewable project applications, but would also effect non-renewable generation and transmission facilities applications. This backlog in processing would result in adding further delays to project development, beyond the existing targeted delay established by the provincial government.

This backlog will also result in multiple overlapping process schedule items across applications for information responses, evidence submissions and hearings, which would create time constraints and limitations for which the technical experts and consultants would not be able to efficiently balance. In addition, these delays will also negatively affect the participating landowners and municipalities that have signed agreements with developers for their lands. The stakeholders believe the development of these projects are in their interests and have designed their plans around the timelines of these projects becoming operational. The targeted delay to renewables, and the subsequent application backlog would negatively affect these stakeholders' ability to progress their interests. By allowing for the continued submission of new applications, and by continuing to process these applications to the fullest extent possible, the AUC will be actively taking steps to avoid this backlog.

The AUC has successfully considered specific and emerging concerns relating to renewable developments in the past, without requiring a full stop on all approvals of renewable projects, as shown with the Rule 007 amendments relating to solar glare, shadow flicker and battery energy storage. The AUC was able to successfully provide interim guidance to developers throughout the process, leading to more efficient application processing.

#### Non-consideration of Projects Limiting Impacts of Concern

Options one and two do not allow any opportunity for the AUC to objectively consider the specifics of project applications; specifically, those projects which do not result in the impacts under consideration of the inquiry.

The focus of the inquiry has been established on the following basis:

- Considerations on development of power plants on specific types or classes of agricultural or environmental land.
- Considerations of the impact of power plant development on Alberta's pristine viewscapes.
- Considerations of implementing mandatory reclamation security requirements for power plants.
- Considerations for development of power plants on lands held by the Crown in Right of Alberta.
- Considerations of the impact the increasing growth of renewables has to both generation supply mix and electricity system reliability.

The provincial government's decision to consider all renewable projects under the same lens of impacts is an oversight, and has resulted in a number of carefully sited projects on existing industrially developed land, and within other developed and urban areas, being unreasonably penalized.

There are a number of projects which are sited behind the fence of existing industrial facilities, on contaminated lands, or otherwise sited on "brownfield" areas. These projects are not sited on agricultural land of any value nor are they disrupting viewscapes, pristine or otherwise. These projects are typically developed by organizations with commitments to detailed decommissioning and reclamation planning, with the majority of projects having preliminary decommissioning plans in place prior to construction.

All projects, both renewable and non-renewable, have site-specific concerns and considerations the AUC will need to consider when deciding if approval is in the public interest. While some or most currently proposed renewable projects will have similar concerns relating to issues arising in the inquiry, there are projects that do not. Notwithstanding the provincial governments unilateral consideration of the impacts of renewable projects, as an impartial and objective regulator, the AUC should have the authority to review and process applications based on the specifics of each application. Allowing for continued submission and processing of applications will allow for the efficient processing of applications for these project types largely unaffected by the considerations of the review process.

#### Alignment with AESO

As the AUC and the provincial government are aware, the AESO is integrating a new process for the interconnection of generation projects, utilizing cluster studies to assess the impacts projects could have to the wider Alberta Interconnected Electric System. The AESO have now included specific fees to be associated with the inclusion of projects in cluster studies, and established timelines to complete the Projects once the results of the cluster studies are accepted. In response to this, developers have been submitting System Access Service Requests (SASR) to the AESO to join the cluster study, and have been paying their fees, on the understanding they would be able to develop projects within the new AESO connection process timelines.

The targeted delay established by the provincial government, and subsequent backlog delays from the AUC process, could jeopardize developers' ability to meet the project development timelines that have been submitted to the AESO. It is understood that failing to meet these timelines would result in additional fees, processing delays and further studies would be required. In continuing to process applications, the AUC would be actively working to minimize the risk of further delays and fees associated with the AESO interconnection process.

#### Conclusion and Recommendation

GCR considers the most efficient path for the AUC's consideration would be to continue to allow applications to be submitted, and to process these applications to the furthest extent possible; including issuing of information requests, issuing notices of applications, and holding technical meetings or



hearings in situations which the project-specific impacts or concerns are unrelated to the considerations of the inquiry. In progressing with this option, the AUC also works to ensure the backlog of application processing is minimized to reduce the risk of further delays in 2024, once the targeted delay on development is lifted.

In addition, GCR strongly urges the AUC and the provincial government to consider adjusting its order to allow the approval of renewable developments if the AUC can be satisfied that the potential impacts from the proposed renewable development are not specific to the concerns being considered in the inquiry or can be fully mitigated. This would allow the AUC to truly consider projects objectively on a case-by-case basis, and provide applicants an opportunity to showcase the decisions they have made to reduce the impacts of their projects.

The AUC prides itself on reducing regulatory burden and “red-tape” for development and investment in the province. While the concerns being raised as part of the inquiry are valid, GCR submits it will be important for the AUC to recognize that the developers have signed agreements with the participating landowners and municipalities. These stakeholders have decided that the development of the project is in their interests, and the targeted delay to renewables will affect these interests, with subsequent delays from application backlogs impacting them further.

Allowing the AUC to approve these projects, which have shown clear efforts to limit impacts, would minimize the risk of processing backlogs, reward developers for actively taking these impacts into consideration when designing their projects, and provide assurances to communities and investors alike that the AUC remains committed to regulatory efficiency for the processing of renewable development in the province.

Kind regards,

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We appreciate the opportunity to provide feedback on the Alberta Utilities Commission's (AUC) pause on approvals for renewable electricity generation.

Invenergy is North America's largest privately held renewable energy company and a global leader in developing and operating sustainable energy solutions. To date, we have successfully developed over 202 projects representing more than 31GW of capacity globally. We have long been active in the Canadian marketplace having developed several wind, solar, and thermal projects in the country. Ontario is home to our largest project in Canada, the 584MW St. Clair Energy Centre where we were just awarded a contract for a facility upgrade in the Independent Electricity System Operator's (IESO) expedited procurement process. We are currently developing a portfolio of wind, solar and energy storage in several provinces including Alberta. Invenergy is supportive of Alberta's deregulated market and the large investment in the buildout of renewable energy projects in the province. Investments by the renewable industry not only create jobs in clean technology, they also incentivize other businesses to re-locate to and expand in the province. The federal government's investment in clean energy through the Investment Tax Credits (ITC) makes this a critical time to develop projects that can provide maximum benefit to ratepayers. This includes Carbon Capture and hydrogen technologies, which can support the continued use of natural gas generation. Putting this funding at risk could prove to be a roadblock to natural gas investments, as well.

In the United States, we have partnered with many corporate customers to provide power using corporate power purchase agreements (PPAs). We have seen the positive impact this model has on communities by bringing jobs to the area and providing clean and reliable power. Many of these projects would not have been possible without the type of PPA style contracts



facilitated by deregulated markets like Alberta's. It is for these reasons that, prior to the AUC announcement, Invernergy maintained an optimistic view of future investments in the province. Invernergy recognizes the importance of community acceptance to go forward with a project. We diligently work with communities by seeking municipal support, creating community benefit funds, and organizing public meetings for consultation. In addition, we have experience in responsibly decommissioning projects, doing it in an environmentally sensitive way, which protects landowners we have partnered with. Invernergy's practice, is to post decommissioning surety bonds, for the benefit of each landowner, even when it is not required by a particular province or state. Industry best practices is for decommissioning issues to be addressed with the landowners at the time of them signing up for the project.

We are disappointed that the AUC has issued a pause when there is an opportunity to resolve the issues at hand while still moving forward with new projects. A process that works in tandem would prevent stalling economic development, creating uncertainty in the market and risking reliability. However, out of the options proposed by the AUC, the least damaging option would be for the 'approval hold only' as this will best prepare the organization for the upcoming influx of applications stemming from the AESO's Cluster 1 study.

Additionally, we believe that the result of the AUC inquiry must include grandfathering of the renewable energy projects being submitted to the upcoming AESO cluster study. These applications represent significant investments of time and money from both public and private entities that relied on the stability of Alberta's electricity markets. Lack of clarity around the rules under which cluster study projects will be developed risks an impact to ratepayers, established businesses serving the renewable industry, and other broader related economic development in the province.

The province would benefit from the AUC and the government providing transparency in terms of what changes are being considered, implementation timelines and an ability to offer input into any proposed policy changes. This would allow companies to anticipate, adjust and prepare for an orderly implementation of any changes being contemplated. Being able to anticipate policy changes is a fundamental requirement for businesses to operate in any province. The lack of certainty and abrupt policy changes can seriously stifle investment and drive economic investment to other jurisdictions.

With respect to the government's concerns about reliability, Invernergy has experience in, and understands the need for, natural gas. Reliability concerns also create an opportunity to further explore implementation of a broader energy storage program. The AESO is currently pursuing a fast frequency response program, but a longer-term solution would enable broader energy storage development and provide the energy solution the government and utilities are seeking. Invernergy and other renewable energy developers active in the province can provide creative solutions including lessons learned from other jurisdictions to ensure host communities, ratepayers, and the province benefit from new project development.

Again, we appreciate the opportunity to provide feedback and we look forward to more opportunities to engage with both the AUC and the government.

Thank you,

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August 18, 2023

Dear AUC Members,

I am writing as a concerned **Alberta citizen, solar panel consumer and worker in the oil & gas sector** in response to your stakeholder feedback request, dated August 3, 2023<sup>1</sup>. **I respectfully request that the**





**AUC end the pause and immediately recommence approvals for renewable energy projects greater than 1MW.** I believe the decision to pause renewable projects of greater than 1MW<sup>2</sup> is unnecessary, will threaten thousands of jobs, will increase electricity costs for all ratepayers, will stifle billions of dollars in investment, and will slow efforts to address climate change. Alberta is the solar powerhouse of Canada, and we need to maintain our competitive edge.

I understand that you have a number of concerns you are seeking to address<sup>3</sup>, below. *(I would add that these are the SAME concerns Albertans have regarding abandonment of oil and gas infrastructure – so we should apply a moratorium on that as well if we are being consistent. The irony is incredible.)*

- With respect to **land reclamation** concerns, please note that solar sites will remain viable well past the end of life of the original panels, and this will significantly reduce land reclamation needs. Additionally, The Government of Alberta already has reclamation [Guidelines for Renewable Energy Operations](#) which address this matter.
- With respect to **end of life** concerns for renewable energy infrastructure disposal, the Alberta Recycling Management Authority (ARMA) is already piloting reuse and recycle programs for solar PV. Given that the majority of solar being installed today will be in operation for well over 25 years, ARMA is really out ahead on this matter.
- With respect to **land use** concerns, such as food security, wetland preservation and wildlife conservation, Solar Alberta has already created highly relevant Solar Siting Recommendations: <https://solaralberta.ca/solar-siting-recommendations/>. I believe you could review and adopt protocols such as these without a pause on approvals.

If the Government of Alberta and the AUC are unwilling to immediately end the pause, I respectfully request that you continue to fully process new and existing excluded applications without issuing any approvals until after the pause period (Option 3 in your announcement).

Thank you for considering my request.

Sincerely,

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Dear Alberta Utility Commission Members,

I am writing on behalf of the [Alberta Environmental Network](#) in response to your stakeholder feedback request<sup>1</sup>, dated August 3, 2023. We respectfully request that the AUC cancel the moratorium on approvals for renewable energy projects greater than 1 MW.

The Alberta Environmental Network is a nonprofit society that has been in operation since 1987. We are a member organization with over 12,000 supporters across the province. Our mission is to protect and enhance Alberta's environment, and are well known for co-leading both the Defend Alberta Parks and Alberta Beyond Coal campaigns.



The decision<sup>2</sup> to halt approvals for renewable electricity projects of greater than 1 MW is unprecedented. This action will threaten thousands of jobs, increase electricity costs for all ratepayers, stifle billions of dollars in investment, and slow efforts to address climate change.

**Halting approvals does not serve Albertans.** Rather, we need to continue approvals and launch an open, transparent and meaningful review of these projects. I understand that you have a number of concerns you are seeking to address<sup>3</sup>:

- With respect to land reclamation concerns, please note that solar sites will remain viable well past the end of life of the original panels, and this will significantly reduce land reclamation needs. Additionally, The Government of Alberta already has reclamation [Guidelines for Renewable Energy Operations](#) which address this matter.

- With respect to end of life concerns for renewable energy infrastructure disposal, the Alberta Recycling Management Authority (ARMA) is already piloting reuse and recycle programs for solar PV. Given that the majority of solar being installed today will be in operation for well over 25 years, ARMA is really out ahead on this matter.

- With respect to land use concerns, such as food security, wetland preservation and wildlife conservation, Solar Alberta has already created highly relevant [Solar Siting Recommendations](#). I believe you could review and adopt protocols such as these without a pause on approvals.

If the Government of Alberta and the AUC are unwilling to immediately end the moratorium, we respectfully request that you continue to fully process new and existing excluded applications without issuing any approvals until after the pause period (Option 3 in your announcement).

Thank you for considering our request. As a grassroots organization that enjoys partnerships and is active in communities across Alberta, united in how highly we value Alberta's environment, we will continue to organize and speak out about the things that matter most to Albertans. We look forward to more discussion with you on these matters, and sincerely hope that the moratorium on approvals will be lifted immediately.

Sincerely,

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Dear AUC Members,

I am member of, an investor in, and an employee of, Peace Energy A Renewable Energy Cooperative (PEC) and am writing to you in response to your stakeholder feedback request, dated August 3, 2023<sup>1</sup>. **I respectfully request that the AUC end the pause and immediately recommence approvals for renewable energy projects greater than 1MW.** I believe the decision to pause renewable projects of greater than 1MW<sup>2</sup> is unnecessary, will threaten

thousands of jobs, will increase electricity costs for Alberta ratepayers, will stifle billions of dollars in investment, and will slow efforts to address climate change. Alberta is a solar powerhouse, and can continue to lead Canada in moving our economies away from fossil fuels towards renewables.

This is an energy transition and there will be a need for carbon based fuels for many years to come. The energy industries can work synchronously while workers and investment transition to a new and healthier way of doing things. Our Cooperative is an example of allowing community level investment (with 100's of community level investors) to take part in the transition to renewables and change your economy for the better.

PEC is literally on the cusp of investing millions of dollars into northwest Alberta (with our first of many projects) and we were days away from submitting our application for a relatively small 4.99MW project. Under 5MW is already deemed to be a simplified process under the AUC policy and I would ask why the limit for this pause has been set at under 1MW. Not only is the pause unnecessary, but the 1MW limit is even more bewildering. The pause seems more like political posturing by the government than reasonable and clear AUC guidelines.

It has been stated that the following are concerns that need to be addressed<sup>3</sup>:

- **Land reclamation:**
  - with a never ending resource from the sun , it is highly unlikely that a project will have an end of life. Once the infrastructure is in place, the project can be easily re-powered in the future with more efficient solar panels and inverters.
  - Unlike other industries, there are no toxic chemicals left in the ground or local water poisoned from a solar power plant, so end of life does not require extreme clean up measures at the public expense and the land can be easily turned back to agricultural use.
- **End of life concerns:**
  - when the plant is re-powered (or if it is actually removed from service for other use of the land), the equipment will be removed and recycled, the piles can be pulled from the ground and the land turned back to agricultural use. The Government of Alberta already has reclamation [Guidelines for Renewable Energy Operations](#) which address this matter.
  - concerns for renewable energy infrastructure disposal, the Alberta Recycling Management Authority (ARMA) is already piloting reuse and recycle programs for solar PV. Given that the majority of solar being installed today will be in operation for well over 25 years, ARMA is really out ahead on this matter.
- **Land use concerns:**
  - Our company has chosen not to use cropped land and we have a long-term land lease with the owner of under used pasture land.

- We plan to have parallel agricultural use while the solar power plant is in operation and will plant native beneficial plant species on our project area. So not only will we provide Albertans with clean, renewable power but we will actually increase the agricultural value of the land through Agrivoltaics.
- concerns, such as food security, wetland preservation and wildlife conservation, Solar Alberta has already created highly relevant Solar Siting Recommendations: <https://solaralberta.ca/solar-siting-recommendations/>. I believe you could review and adopt protocols such as these without a pause on approvals.

If the Government of Alberta and the AUC are unwilling to immediately end the pause, I respectfully request that you:

1. continue to fully process new and existing excluded applications without issuing any approvals until after the pause period (Option 3 in your announcement).
2. increase the maximum excluded project size to under 5MW as fits with other regulations already in place.

Thank you for considering my request.

Sincerely,

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I am writing as a concerned Albertan resident in response to your stakeholder feedback request, dated August 3, 2023<sup>1</sup>. **I respectfully request that the AUC end the pause and immediately recommence approvals for renewable energy projects greater than 1MW.** I believe the decision to pause renewable projects of greater than 1MW<sup>2</sup> is unnecessary, will threaten thousands of jobs, will increase electricity costs for all ratepayers, will stifle billions of dollars in investment, and will slow efforts to address climate change. Alberta is the solar powerhouse of Canada, and we need to maintain our competitive edge.

I understand that you have a number of concerns you are seeking to address<sup>3</sup>:

- With respect to **land reclamation** concerns, please note that solar sites will remain viable well past the end of life of the original panels, and this will significantly reduce land reclamation needs. Additionally, The Government of Alberta already has reclamation [Guidelines for Renewable Energy Operations](#) which address this matter.
- With respect to **end of life** concerns for renewable energy infrastructure disposal, the Alberta Recycling Management Authority (ARMA) is already piloting reuse and recycle programs for solar PV. Given that the majority of solar being installed today will be in operation for well over 25 years, ARMA is really out ahead on this matter.



# AUC

Alberta Utilities Commission

- With respect to **land use** concerns, such as food security, wetland preservation and wildlife conservation, Solar Alberta has already created highly relevant Solar Siting Recommendations: <https://solaralberta.ca/solar-siting-recommendations/>. I believe you could review and adopt protocols such as these without a pause on approvals.

If the Government of Alberta and the AUC are unwilling to immediately end the pause, I respectfully request that you continue to fully process new and existing excluded applications without issuing any approvals until after the pause period (Option 3 in your announcement).

Thank you for considering my request.

Sincerely,

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On August 3<sup>rd</sup>, 2023, the AUC announced that it will be holding an inquiry into and developing a report on the economic, orderly and efficient development of electricity generation in the province (the “**Inquiry**”) as directed by the Government of Alberta (“GoA”).<sup>1</sup> An AUC report making findings or providing observations or considerations for options (the “**Report**”) is to be submitted to the Minister of Affordability and Utilities no later than March 29<sup>th</sup>, 2024.<sup>2</sup> While undertaking the Inquiry and developing the Report, the AUC is also required to pause approvals of new renewable power plants over one megawatt effective until February 29<sup>th</sup>, 2024 (the “**Approval Pause**”).<sup>3</sup> Stakeholder feedback on implementing the Approval Pause is now being invited.<sup>4</sup> Capital Power appreciates the opportunity to provide the AUC feedback. The following are Capital Power’s submissions.

Capital Power is an independent power producer that owns, operates and develops electric generating facilities of various technology and fuel types across North America. In Alberta, these include approximately 2.8 GW of natural gas, wind and solar power generating facilities in operation, an incremental 500 MW of natural gas-fired generation under construction at Genesee, 140 MW of wind capacity about to start construction at Halkirk, and nearly 500 MW of future wind and solar projects. These interests represent over \$5 billion in investments since Alberta’s deregulation of the wholesale electricity market. Such investment decisions require confidence in the predictability of the regulatory and market frameworks. Capital Power is supportive of the GoA and Commission’s objective of ensuring the economic, orderly, and efficient generation development so this can be maintained.

With respect to the implementation of the Approval Pause, the Commission’s announcement outlined three discrete options to implement the Approval Pause and solicits alternative options for implementation. As detailed below, Capital Power supports a modified version of the ‘Approval Hold Only’ approach that incorporates elements of the ‘Partial Abeyance’ option. In addition to its

feedback on the implementation options, Capital Power also provides preliminary comments on the broader policy issues that will form part of the inquiry for the Commission’s consideration at this time.

**No Option Presented is Sufficient without Modification**

The AUC provided a list of pause implementation options for interested parties to consider and provide feedback.<sup>5</sup> These options are reproduced in the table below along with Capital Power’s comments. Each of the three options alone would result in unnecessary delay in processing existing and prospective facility applications.

Option	Description	Capital Power Comments
Complete Abeyance	No new applications during pause period and all existing excluded applications will be placed in abeyance during the pause with AUC taking no further steps to complete record or issue decisions.	Precluding new and existing excluded facility applications from progressing through the record development process would result in the greatest amount of regulatory delay with little benefit. Another drawback of this option is the lack of any means of tracking or establishment of a “queue” to process the rush of applications once the pause period ends.
Partial Abeyance	No new applications accepted and all existing ones with an incomplete record will proceed until written evidence complete then be put in abeyance until pause expires. No public hearings during the pause. Existing applications with complete record to be placed in abeyance until the pause period ends.	This is preferable to complete abeyance given the ability to process some (i.e., existing) applications, therefore, mitigating regulatory delay to a greater extent. However, this option still lacks a “queue” for processing new applications. This would create issues in terms of managing a build-up of “new” applications that are not accepted during the Approval Pause and which could likely get submitted in close succession at the end of the pause period.
Approval Hold Only	AUC continues to fully process new and existing excluded applications without issuing any approvals until after the pause period.	Of the options, proceeding through the record development process for all applications is most reasonable to maintain an orderly processing of applications and to prevent a build-up of project applications that could come in a wave after the Approval Pause. However, it is unclear how (and if so when) potential future policy and enabling legislation could alter the approval framework and affect the decisions to be rendered for applications submitted during the pause.

**“Approval Hold Only” is the only workable option among the three discrete approaches but it needs further clarity and/or modification.**

Capital Power’s understanding of the “Approval Hold Only” option is that all applications are processed until the record is complete (including oral hearings), with the only item remaining being rendering the Commission’s decision. Under the description provided, it is unclear if the Commission would be applying the existing approval framework as its rubric for determining whether renewable generating facility applications are in the public interest. If so, this would run counter to the GoA and AUC’s stated rationale for initiating the inquiry and may incent an inrush of applications given the uncertainty of how future policy or legislation may alter the Commission lens for assessing and approving renewable generation projects that apply after the end of the Approval Pause. Consequently, Capital Power suggests that, in addition to providing further clarity by the AUC, modifications to the “Approval Hold Only” option be considered.

Capital Power respectfully submits that all applications subject to the Approval Pause, new or existing, should be permitted to progress through the record development process. However, only proceedings with no interveners, objections or concerns raised by the Commission (i.e. Category 3

or less)<sup>6</sup> should be permitted to advance to the decision phase under the existing framework with decisions issued once the pause period expires.

Where objections are raised (whether by interveners or the Commission), the record development process should progress until, but not including, the oral hearing phase where the proceeding would then be placed in abeyance until the pause period has ended. This would allow for the proponent, intervenors, and the Commission to react to findings and observations that arise from the Inquiry.

While this may impact the timing of hearings for the current 14 projects that are in-front of the Commission, based on Capital Power's experience with recent proceedings, it may not materially alter timelines for proponents that are willing to submit applications during this time as it can take six to eight months to develop the record prior to an oral hearing. This approach would limit the incentive for an in-rush of applications while allowing projects that have no concerns (Category 3 or less) to progress in as timely a manner as possible.

### **Broader Policy Issues**

The Commission noted that there are "broad policy issues" with overlapping jurisdictions and stakeholders.<sup>7</sup> Capital Power agrees but is concerned about the Inquiry and the potential for it to create confusion with and/or impede the progress of other related key initiatives. Specifically, the AESO has initiated its own consultation on future pathways for the wholesale electricity market in recognition of, among other things, the impact of increasing renewable generation on the grid.<sup>8</sup> There appears to be overlap in the Inquiry's scope around "Considerations of the impact the increasing growth of renewables has to both generation supply mix and electricity system reliability."<sup>9</sup> Capital Power recognizes that the AESO issued a letter noting it would support the AUC in implementing the Approval Pause<sup>10</sup> and is confident the agencies can coordinate their respective efforts on this issue. Capital Power believes that it is important that there is a clear understanding of and delineation between the scope of each of these initiatives as maintaining grid reliability is critical. In the next step of the Inquiry's process, Capital Power submits that the Commission should make the bounds of the Inquiry clear to stakeholders and establish principles guiding the development of any resulting recommendations.<sup>11</sup> Presumably, this will also include timelines for how Inquiry findings will be incorporated as part of the AUC's application assessment framework but, if not, Capital Power respectfully submits that the Commission should.

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**RE: ENMAX Corporation (“ENMAX”) Stakeholder Feedback  
Alberta Utilities Commission (“AUC”) Announcement to Launch Inquiry, Implement  
Pause on Approvals for New Renewable Electricity Generation**

On August 2, 2023, the Government of Alberta passed the *Generation Approvals Pause Regulation* through an order-in-council that will require the AUC to pause approvals of new power plants and hydro developments that produce renewable electricity over one megawatt effectively immediately, until February 29, 2024.

On August 3, 2023, the AUC issued an announcement requesting stakeholder feedback on implementing the approval pause. The AUC identified three methods for addressing the approval pause including:

- **Complete abeyance:** The AUC does not accept new applications during the pause and applicable existing applications will be placed in abeyance during the approval pause.
- **Partial abeyance:** The AUC does not accept new applications during the pause, however existing applications would proceed to the point of written evidence. No public hearings would occur and proceedings with a complete record will be placed in abeyance until the pause period expires.
- **Approval hold only:** The AUC will continue to fully process applicable new and existing applications without issuing any approvals until after the pause period expires.

ENMAX is in support of implementing an approval hold only, whereby the AUC continues to fully process new and existing excluded applications without issuing any approvals until after the pause period. Using an approval hold only approach will help minimize uncertainty and disruptiveness for the electricity industry. The AUC should continue to assess renewable electricity generation projects on an individual basis and those projects that meet the current requirements should continue to move forward such that they are ready for approval issuance upon expiry of the pause period.

Notwithstanding ENMAX’s stance on moving forward renewable electricity projects, ENMAX is seeking clarity on whether the AUC will approve new applications pertaining to changes of ownership for renewable electricity generating facilities during the pause.

ENMAX appreciates the opportunity to provide its comments. Should you have any questions or concerns please call the undersigned at 403-390-7748.

Sincerely,

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Enbridge appreciates the opportunity to provide comments on implementing the approval pause for the project types highlighted in the Alberta Utilities Commission's (AUC's) August 3, 2023 announcement (the "Announcement"). Enbridge Inc. (Enbridge) is a leading North American energy infrastructure company. We safely and reliably deliver the energy people need and want to fuel quality of life. We own and operate three wind projects and a solar project in Alberta, with several more renewable energy projects under-development in the province. As a result, this approval pause directly impacts our business.

In the Announcement, AUC requests stakeholder feedback on implementation of the approval pause and suggests three options, including Complete Abeyance under which all review and approval work would stop and no new applications would be accepted, Partial Abeyance under which AUC would advance all existing applications to the point where the application is complete but would otherwise not act on applications, and Approval Hold Only under which all activity would proceed as normal but no approvals would be issued.

**Enbridge recommends that AUC adopt an Approval Hold Only approach insofar as AUC can confirm that eventual review and approval will be based only on the current rules for any applications submitted before the AUC's inquiry report is published and that environmental and other assessment reports and/or related permits will not expire solely due to the length of the approval pause. If AUC cannot provide such direction, Enbridge recommends that AUC adopt a Complete Abeyance approach.**



Project developers incur expenditures on resource testing, environmental monitoring, and other activities, including obtaining assessments and permits from other jurisdictional agencies, in order to complete an application with the AUC. The approval pause has created uncertainty for developers who had intended to submit applications before March 2024 regarding the regulatory framework under which they would be submitting projects for AUC review. Clarity on the framework that would apply to these projects would help minimize delays in adding new generation to Alberta's grid following AUC's report.

As a result, we recommend that any project submitting an application prior to the publication of AUC's inquiry report would be reviewed and approved (as applicable) under the current *Rule 007* approach and other related requirements. This would be consistent with other amendments to *Rule 007*, which typically have an effective date that does not impose retroactive requirements on applications already in the queue. We further recommend that AUC confirm that any provincial environmental assessments, permits, or other assessments and reports would not expire solely due to the duration of the approval pause for those projects submitting applications prior to the publication of the AUC's inquiry report. **In the case that AUC confirms these two protections will be available to those projects, we recommend that AUC adopt an Approval Hold Only approach to implementing the approval pause.**

**In the event AUC does not adopt the above recommendations, in order to avoid unnecessary expenditure and duplication of work by AUC and/or by developers, we would recommend that AUC proceed with a Complete Abeyance approach.**

We appreciate AUC providing an opportunity to comment on this topic, and we look forward to participating in future consultations and conversations with AUC as it undertakes its inquiry into the matters outlined in the Announcement.

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**RE: Comments on Announcement – AUC to launch inquiry, implement pause on approvals for new renewable electricity generation**

On August 3, 2023, the Alberta Utilities Commission (AUC or Commission) announced the launch of an inquiry into the ongoing economic orderly and efficient development of electricity generation in Alberta.<sup>1</sup> The Commission also announced the implementation of a pause on the approvals of new renewable electricity generation.

The Commission, seeking feedback from stakeholders on the implementation of the pause, outlined three options. AltaLink submits that option 3, 'approval pause only,' is in Alberta's electricity industry's best interest. This option allows market participants to determine, based on their specific circumstances, whether they wish to proceed with moving an application through the regulatory process while the Commission conducts the inquiry. AltaLink recognizes that the inquiry may bring uncertainty for some market participants and their projects. As a result, AltaLink believes it is appropriate to allow each market participant the choice whether to continue/start the regulatory approval process. This option will also likely help alleviate any potential backlog of applications or regulatory lag in the Commission's process once the pause is lifted and help the Commission continue to meet its performance metrics for both facility applications (outlined in AUC Rule 007) and rate-related applications (outlined in Bulletin 2015-09).

AltaLink looks forward to the Commission's further announcements on the inquiry.

Sincerely,

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As a major developer of renewables, ATCO Renewables welcomes the review of renewable electricity development in Alberta as renewables continue to increasingly penetrate Alberta's grid and electricity market. ATCO Renewables is keenly interested in the outcome of the AUC Inquiry, and we will actively participate to the fullest extent possible to enable solutions for the issues raised.

ATCO Renewables would like to emphasize that it is critical the renewables 'pause' not be extended past the stated deadline of February 29, 2024. This will be crucial for investment certainty in not just the renewables sector but in all sectors of Alberta's economy. The pause as announced should already be expected to have negative impacts on investor sentiment and confidence. Certainty to the investment community must be a clear priority and goal, and messaging to this effect in the near-term to stakeholders will be helpful.

### **Implementation of Pause**

In implementing the approval pause, ATCO Renewables recommends that the Commission utilize an **Approval Hold Only** and continue to fully process new and existing applications during the pause period. This approach will:

- best support the Commission's ability to process approvals following the pause by minimizing bottlenecks that would otherwise be created by the pause. These bottlenecks would exacerbate the very issues the AUC is seeking to resolve – that is, the processing of historically high volumes of new renewables and thermal power plant applications.
- minimize further delays to projects already being delayed by the pause. Projects that have already been delayed by the pause should not be further delayed by the implementation of new requirements resulting from the Inquiry.
- have the least impact on continued investment in the province by reaffirming to the investment community that abrupt decisions by governments and regulators are purposeful and temporary, and that Alberta remains open for business.

Efforts must be made to provide certainty for existing and potential projects as the AUC performs the upcoming Inquiry. In an effort to reduce some of the investor uncertainty created by the pause, the AUC should **provide a clear 'effective' date for any amendments that result from the pause** as soon as possible. Any changes to regulatory requirements arising from the Inquiry should be managed by



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grandfathering projects to the current Rule 007 for any project applications filed prior to the published 'effective date' and by using Information Requests for any supplemental information to meet any to new approval requirements for projects that applied after the 'effective date' and before the pause has ended.

Any form of abeyance – either complete or partial – will have a detrimental effect on the ability of the AUC to process applications in a timely manner following the pause and should be expected to have the greatest negative impact on investor confidence across Alberta's economy.

### **Additional Recommendations**

- **Module approach for regulatory matters:** The Inquiry will be covering a wide range of matters. Some of the matters raised will be more easily resolved than others, particularly those that can be resolved through modifications to the AUC Approval process (through new rules or requirements). Examples include but not limited to reclamation, land use and pristine viewscales. We are confident these can be resolved within six months through new requirements or modifications to the AUC Approval process. ATCO Renewables recommends that a 'module approach' be taken to ensure the focus on each of these matters be enabled and solutions can be enabled prior to the publicly stated end of the pause.
- **Alignment and coordination with the AESO and Government of Alberta for market matters:** Other matters raised by the Inquiry are harder issues to address, such as grid reliability due to the changing supply mix. ATCO Renewables is keen to ensure these issues are resolved. However, we expect these issues may take longer to resolve and alignment with AESO and their related initiatives will be critical to both effectively resolving these issues and demonstrating to the investment community that Alberta's various authorities on electricity are working together in a concerted effort, and that stakeholder engagement on high priority issues is not for nought. The AESO is Alberta's electricity system planner and is accountable to ensure reliability. The AUC pause, the GOA's policy direction and regulatory changes, and the AESO's initiatives, particularly its Market Pathways Initiative must be coordinated. Clear messaging that each of these initiatives are being undertaken in consideration of the others will be critical for continued investor confidence in Alberta, not only in the electricity sector but in other areas of the economy. Any matters of the Inquiry relating to the supply mix and electricity system reliability should be resolved on a separate timeline and must not extend the pause.
- **Work with the Government of Alberta to commit that the pause will not be extended:** The AUC must provide clarity and certainty to investors. There is currently misalignment between the end of the Pause on February 29, 2024 and the March 29, 2024 deadline for the Inquiry report. Further, given the initial lack of engagement on the decision to pause renewable approvals, investors will see risk in it being extended and as a result Alberta could lose incremental and

important capital investments to our province's economy. In order to enable investor certainty in Alberta, the AUC must work with the Government of Alberta to commit to a February 29, 2024 completion of the Inquiry report and must commit that the pause will not be extended.

### Closing

We thank the AUC for the opportunity to provide feedback on the development of the approach to its Inquiry. ATCO Renewables reiterates that how the AUC chooses to manage this pause will be critical for investment certainty in not just renewables but all sectors of Alberta's economy and that a commitment to ensure the pause is not extended be made as soon as possible. ATCO Renewables looks forward to actively participating in the Inquiry.

Sincerely,

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The Chinook Area Land Users Association (CALUA) represents more than 50 stakeholders (as of today) who are affected by TransAlta's transmission line routing through the MD of Pincher Creek.

CALUA wants the AUC to apply

- **Complete abeyance:** The AUC does not accept new applications during the pause period and all existing excluded applications will be placed in abeyance during the pause period with the AUC taking no further steps to complete their record or issue decisions.

Please find our rationale in the attachment. Further clarification will be provided after CALUA's meeting with Premier Smith in the September.

Sincerely

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I, am a stakeholder in the context of the routing of TransAlta's transmission lines through the MD of Pincher Creek and hereby provide my submission to AUC's inquiry of Aug 3, 2023.

The following parcels are affected by the routing of the transmission lines are:

1. Plan 0810973;1;1 (Pt.NE 8)
2. Pt. SE 17-4-28-W4

I want the AUC to apply:

- **Complete abeyance:** The AUC does not accept new applications during the pause period and all existing excluded applications will be placed in abeyance during the pause period with the AUC taking no further steps to complete their record or issue decisions.

Please find my rationale in the attachments.

Sincerely

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We are writing to you on behalf of our esteemed clients, XXXXXXXXXXXX, who have engaged our services in the pursuit of their legacy planning objectives. Strongroom LLP specializes in facilitating

legacy planning, a fundamental process that shapes the impact and contributions individuals leave for future generations.

In this context, we would like to draw your attention to the proposed Riplinger Wind Power Project, which is located mere kilometers from the pristine environs of Waterton Lakes National Park. We submit that the Alberta Utilities Commission must both consider the negative impacts that the proposed wind power project will impart upon the natural and cultural fabric of the area.

Legacy transcends time, and it is essential that any new development, such as the Riplinger Wind Power Project, aligns with the values of sustainability, conservation, and cultural preservation. The Blum family's aspirations are centered around the creation of a lasting legacy - a bison ranch and ecological corridor in the ecologically sensitive Drywood River Valley. This noble endeavor is well underway, involving significant investment to purchase and connect parcels of land, effectively establishing a vital natural corridor linking private lands with those held by Southern Alberta Land Trust Society and Nature Conservancy Canada.

The vision of the Blum family is to witness the return of bison herds to the very grounds where Kootenay Brown beheld their majesty for the first time, a sight that harmoniously blended the prairie and mountain landscapes. This project, when completed, is poised to become a beacon for tourism, education, prairie ecology, sustainable harvesting, and hunting practices, as well as a catalyst for spiritual recognition and restoration of native culture. It is difficult to reconcile this unique vision with the high-power transmission lines and wind turbines that are proposed to negatively impact these lands.

The proposed Riplinger Wind Power Project threatens to cast a shadow over this legacy project, potentially erasing the positive contributions that the Blum family envisions for the Drywood River Valley in several ways:

- 1. Impact on Wildlife and Habitat:** The construction and operation of the wind power project will result in habitat fragmentation, noise pollution, and disturbance to local wildlife and ultimately to the bison the Blum family aim to reintroduce. Such disturbances could hinder the ecological connectivity crucial for the success of their legacy project.
- 2. Aesthetic and Cultural Impact:** The scenic beauty of the Drywood River Valley is a significant aspect of the Blum family's legacy. The presence of industrial wind turbines in close proximity to the proposed bison ranch will mar the natural landscape and detract from the cultural and historical significance of the area.
- 3. Tourism and Local Economy:** The legacy project not only contributes to the preservation of nature but also supports local tourism and the economy. The proposed wind power project will potentially deter tourists and visitors who come to experience the unspoiled beauty of the Drywood River Valley. Local businesses and the community of this region will be negatively impacted.
- 4. Environmental Education and Indigenous Culture:** The bison ranch serves as an educational platform for promoting prairie ecology and indigenous culture. The wind power project will compromise these educational efforts and the opportunity for spiritual recognition and restoration of native culture that the legacy project provides.



**5. Sustainability and Heritage:** The bison ranch has the potential to promote sustainable land use practices, including controlled hunting and harvesting, while honoring the heritage of the region. The wind power project's presence will disrupt these aims and lessen the long-term viability of the Blum family's initiative.

Given the numerous potential negative impacts associated with the Riplinger Wind Power Project, we strongly urge the Alberta Utilities Commission to consider these concerns carefully. It is essential to balance renewable energy goals with the preservation of our natural and cultural heritage, especially in sensitive areas like the Drywood River Valley and other lands near Waterton Lakes National Park.

Collaborative efforts to find an alternate suitable location for renewable energy projects that do not compromise existing conservation and cultural initiatives are of paramount importance and the Alberta Utilities Commission should not permit the Riplinger Wind Power Project to diminish the Blum's legacy which will benefit all of Alberta. To assist with your review, included with this correspondence is a presentation with an overview of the Blum's legacy Bison Ranch and Ecological Corridor.

Thank you for considering the concerns raised in this letter. We trust that the Alberta Utilities Commission will prioritize a holistic and sustainable approach that respects the invaluable efforts of individuals like the Blum family and their commitment to preserving our natural heritage for generations to come.

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Dear AUC Members,

I am writing as a concerned Albertan resident in response to your stakeholder feedback request, dated August 3, 2023<sup>1</sup>. **I respectfully request that the AUC end the pause and immediately recommence approvals for renewable energy projects greater than 1MW.** I believe the decision to pause renewable projects of greater than 1MW<sup>2</sup> is unnecessary, will threaten thousands of jobs, will increase electricity costs for all ratepayers, will stifle billions of dollars in investment, and will slow efforts to address climate change. Alberta is the solar powerhouse of Canada, and we need to maintain our competitive edge.

I understand that you have a number of concerns you are seeking to address<sup>3</sup>:

- With respect to **land reclamation** concerns, please note that solar sites will remain viable well past the end of life of the original panels, and this will significantly reduce land reclamation needs. Additionally, The Government of Alberta already has reclamation [Guidelines for Renewable Energy Operations](#) which address this matter.
- With respect to **end of life** concerns for renewable energy infrastructure disposal, the Alberta Recycling Management Authority (ARMA) is already piloting reuse and recycle programs for solar PV. Given that the majority of solar being installed today will be in operation for well over 25 years, ARMA is really out ahead on this matter.



- With respect to **land use** concerns, such as food security, wetland preservation and wildlife conservation, Solar Alberta has already created highly relevant Solar Siting Recommendations: <https://solaralberta.ca/solar-siting-recommendations/>. I believe you could review and adopt protocols such as these without a pause on approvals.

If the Government of Alberta and the AUC are unwilling to immediately end the pause, I respectfully request that you continue to fully process new and existing excluded applications without issuing any approvals until after the pause period (Option 3 in your announcement).

Thank you for considering my request.

Sincerely,

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**RE: Comments on August 3, 2023 Announcement “AUC to launch inquiry, implement pause on approvals for new renewable electricity generation”**

Energy Storage Canada (ESC) is the national trade association dedicated to accelerating the deployment of energy storage in support of a clean, affordable, and reliable energy future.

We are writing in response to the August 3, 2023, announcement “AUC to launch inquiry, implement pause on approvals for new renewable electricity generation.”

While we do not support the pause on approvals of renewable power plants directed in the *Generation Approvals Pause Regulation*, we appreciate the opportunity to comment on the implementation of the regulation and hope to see a speedy, fair, and concise conclusion to the issues raised in the announcement.

On the main point of feedback solicited in the announcement, the approach on how to implement the “pause,” Energy Storage Canada supports the implementation of the “Approval Hold Only” option. Energy Storage Canada further supports the ability of proponents to seek an adjournment of individual proceedings, on a case-by-case basis, should they deem it appropriate to do so. This will allow projects to proceed at their own discretion and minimally delay AUC resources in processing applications.

Finally, on the five points in which the inquiry will investigate, Energy Storage Canada would appreciate the ability to provide feedback, and participate in the inquiry. Our interests relate primarily to the final point – “Considerations of the impact the increasing growth of renewables has to both generation supply mix and electricity system reliability.” The ability for clean, firm and flexible resources, such as energy storage resources, to contribute to system reliability and affordability, via the signals in the energy and ancillary service markets, must be a significant consideration.

Best regards,

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Dear Madames/Sirs:

As a major projects proponent looking to undertake the production of renewable fuels utilizing Biomass to ultimately fuel a fully renewable BioEnergy Carbon Capture & Storage Powerplant within the Province of Alberta, we are seeking clarity on the impact of the six+ month Moratorium on AUC approvals authorized by the two recent Orders In Council. Our concern is that even though the new regulations only suspend the AUC approvals process, they have resulted in unintended impacts upon other renewables. For Alberta BioBord in particular, how do we convince our shareholders, investors and possible lenders to underwrite our first phase of production of our unique renewable straw fibre based fuel pellets if the regulations regarding their usage within a local electricity generation powerplant are uncertain and unknown? At the very least, this Moratorium halts our project's progress until next March/April 2024. Thus costing Albertans the mostly engineering, design and early stage construction jobs which we were hoping to proceed with this September.

- 1) It is our belief that a complete Abeyance is the only option that makes sense for AUC as the uncertainty of final regulations & requirements makes the expenditure of any further investment dollars during the pause too risky to undertake when responsibly managing shareholder investments.
- 2) We have a particular concern insofar as all renewables are being lumped into the same category as Wind & Solar which have well known issues relative to intermittency and unreliability putting strains upon the grid. Specifically, BioMass solid fuels propose to generate substantial baseload and on demand electricity within Alberta and those projects are effectively stalled during this Moratorium.
- 3) The only realistic options for the Biomass project we've been developing under our Alberta BioBord proposals for a straw fibre based fuel pellet facility in Stettler, is for us to begin evaluating establishing our operations in another jurisdiction or for us to commit to selling our Renewable Fuel Pellets under a long term contract to buyers in South Korea, Japan or the UK. That would permanently remove the potential for Alberta to benefit from our BioEnergy Carbon Capture & Storage (BECCS) renewable Powerplant which of course could provide some much needed baseload & on demand generation capacity to counter the instability already being experienced from Wind & Solar generation.

We trust that an amendment to the Regulations enacted could possibly exclude the AUC Approvals Moratorium for any renewable projects capable of demonstrating proposed stable baseload and on demand electricity capacity. Failing that, at the very least a strong statement supportive of any Biomass proposed facility being welcomed within Alberta now and in the future might suffice to avoid the potential loss of this type of invaluable project planned within Alberta, thank you in advance for consideration of our queries.

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To whom it may concern,

This submission refers to the pause all new and in-progress renewable energy project approvals recently requested by the Government of Alberta.

The pause could be implemented considering either complete abeyance, partial abeyance or approval hold only.

First of all, considering all the impacts of such pause, the ideal situation would be for the AUC to conduct the required inquiry into the ongoing economic, orderly and efficient development of electricity generation in Alberta in six months, or even less, without pausing the current approval process. It is not an unusual situation for the governmental agencies to investigate a subject and conduct public meetings and consultations and propose changes to regulatory approval processes without having to suspend them. After the conclusion of the analysis process, new guidelines and requirements are implemented with a feasible timeline in order for the affected industry to adapt to new rules. It is surprising and unnecessary to pause the process so that changes can be discussed and implemented.

The impacts of the current decision are relevant and affect different stakeholders (industry, investors, economy and society as a whole) from different perspectives (social, economic, and political):

- The primary impact of this pause on in-progress projects is related to schedule. It is not clear whether there will be immediate or longer-term adjustments to the AUC Rules governing renewable energy project development. This creates uncertainty regarding the submission package requirements, as new requirements/ considerations may be forthcoming. In addition, we can expect a notable backlog in submissions following the conclusion of this pause, which is expected to further increase review turnaround timelines, also impacting the AUC's performance standards.
- Alberta Environment and Protected Areas has not received clear direction requiring that they cease accepting project submissions. This uncertainty *per se* could cause delays in their current timelines, which are not ideal considering the usual projects' schedules.
- This whole context may impact investors and industry plans to develop in Alberta with all the consequences of this in the whole economy and the energy transition process.
- This uncertainty also affects Alberta's ability to negotiate with the federal government for support to advance Alberta's own net-zero goal.

In case it is not possible to revert the pause decision, our position is that:

- the current processes should continue to be reviewed, even if approvals are put on hold for 6 months;
- new submissions should continue to be accepted based on the current regulations;
- after the public inquiry and AUC conclusions, in case there are changes to the current rules and regulations, a timeline should be proposed for new submissions based on the new rules.

In addition, clear guidance to Alberta Environment and Protected Areas as for the renewable energy project submissions and referral reports issuance is provided in accordance with the defined course of action.

Thank you for considering our perspectives on this.

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I am writing as a concerned Albertan resident in response to your stakeholder feedback request, dated August 3, 2023<sup>1</sup>. **I respectfully request that the AUC end the pause and immediately recommence approvals for renewable energy projects greater than 1MW.** I believe the decision to pause renewable projects of greater than 1MW<sup>2</sup> is unnecessary, will threaten thousands of jobs, will increase electricity costs for all ratepayers, will stifle billions of dollars in investment, and will slow efforts to address climate change. Alberta is the solar powerhouse of Canada, and we need to maintain our competitive edge.

I understand that you have a number of concerns you are seeking to address<sup>3</sup>:

- With respect to **land reclamation** concerns, please note that solar sites will remain viable well past the end of life of the original panels, and this will significantly reduce land reclamation needs. Additionally, The Government of Alberta already has reclamation [Guidelines for Renewable Energy Operations](#) which address this matter.
- With respect to **end of life** concerns for renewable energy infrastructure disposal, the Alberta Recycling Management Authority (ARMA) is already piloting reuse and recycle programs for solar PV. Given that the majority of solar being installed today will be in operation for well over 25 years, ARMA is really out ahead on this matter.
- With respect to **land use** concerns, such as food security, wetland preservation and wildlife conservation, Solar Alberta has already created highly relevant Solar Siting Recommendations: <https://solaralberta.ca/solar-siting-recommendations/>. I believe you could review and adopt protocols such as these without a pause on approvals.

If the Government of Alberta and the AUC are unwilling to immediately end the pause, I respectfully request that you continue to fully process new and existing excluded applications without issuing any approvals until after the pause period (Option 3 in your announcement).

Thank you for considering my request.

Sincerely,

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Dear AUC Members,

I am writing as a concerned Albertan resident in response to your stakeholder feedback request, dated August 3, 2023<sup>1</sup>. **I respectfully request that the AUC end the pause and immediately recommence approvals for renewable energy projects greater than 1MW.**



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It is disappointing during a boom in renewable building, leading to an increase in employment and revenue generation for Albertans, that this government would blindside the very real industry partners that are working every day to build up job opportunities, clean modes of energy, and revenue opportunities for landowners across the province.

I understand that you have a number of concerns you are seeking to address<sup>3</sup>:

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If the Government of Alberta and the AUC are unwilling to immediately end the pause, I respectfully request that you continue to fully process new and existing excluded applications without issuing any approvals until after the pause period (Option 3 in your announcement).

Alberta belongs to not only the Albertans of today, but also those of tomorrow. Building clean, cost effective options for energy is one way that we can leave a better province for those who come after us. Additionally, creating uncertainty in this industry will not only jeopardize jobs today, but the industry in the future.

Thank you for considering my request.

Sincerely,

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**Re: AUC procedural response to the pause of renewable electricity facility approvals mandated by the Government of Alberta.**

FortisAlberta Inc. (FortisAlberta or the Company) makes this submission pursuant to the Commission's August 3, 2023, announcement,<sup>1</sup> regarding its implementation of a six-month pause of approvals for power plants and hydro developments that produce renewable electricity that are greater than one megawatt (1MW), as mandated by the Government of Alberta in Order-in-Council 172/2023. As the AUC will be aware, the Company is a fully regulated pure-play electric distribution utility, which has a service area spanning much of central and southern Alberta where the presence of significant wind and solar resources support significant rates of interconnection for renewable electricity facilities.

FortisAlberta confirms that, as at August 18, 2023, the Company has 103 renewable electricity generation projects in its interconnection queue. During the duration of the government-mandated pause on renewable electricity facility approvals, FortisAlberta's focus will be on managing its own interconnection processes in a way that will provide consistency and a degree of certainty for its current generation customers. In the Company's view, the best way to achieve these outcomes is to preserve the integrity and predictability of all existing processes to the maximum extent possible.

FortisAlberta, therefore, supports the third implementation option identified by the Commission, namely "**Approval hold only**: The AUC continues to fully process new and existing excluded applications without issuing any approvals until after the pause period." In the Company's assessment, the adoption of this approach will provide all stakeholders, including renewable electricity project proponents, with the opportunity to decide, considering their individual circumstances, whether and how to dedicate financial and other resources to proceeding through the current regulatory approval process. It also does not foreclose a



proponent's ability to withdraw their application and to wait until after the pause has ended to proceed with their application(s).

Consistent with its view that each renewable project proponent is best positioned to assess the factors and any potential risks that are relevant to their own project(s) and decide whether to proceed with the regulatory process, FortisAlberta will continue to manage its own interconnection process in accordance with the Company's currently established practices. The Company will, for example, continue to require that customers complete all requirements in each interconnection phase of the Company's Distributed Energy Resources (DER) Interconnection Guide, within existing timeframes, to remain in FortisAlberta's DER queue. The Company considers that this approach will provide maximum certainty to customers, while ensuring that they are aware of all their substantive obligations as a DER proponent seeking interconnection, as well as FortisAlberta's expectations regarding compliance with interconnection procedures.

FortisAlberta's approach of continuing to move DER projects through its interconnection process in the normal course aligns with the AESO's August 14, 2023 connection process announcement, which states that the AESO will continue to progress System Access Service Requests on behalf of market participants following the established AESO connection process.<sup>2</sup>

FortisAlberta appreciates the opportunity to provide these comments and welcomes further engagement on these matters with the Commission and other stakeholder agencies, should such an opportunity be provided. In the interim, the Company will continue to closely monitor any operational impacts of the implementation of the approval pause on its DER interconnection processes and will endeavor to provide the Commission with updates on any significant developments that may arise.

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Dear AUC Members,

We were flabbergasted to hear the news of the provincial moratorium on renewable projects, especially considering the climate-related epic events happening right now in our own Western Canadian backyards, let alone all over the world.

Common sense suggests we should be scaling up the development of our low-carbon energy systems, not scaling back or pausing.

We have listened carefully to the 'reasons' for the 6-month pause, and it is very clear to us that this decision makes absolutely no sense.

We are concerned **Alberta citizens, solar panel consumers & owners**, and in response to your stakeholder feedback request, dated August 3, 2023<sup>1</sup>, **We respectfully request that the AUC end the pause & immediately recommence approvals for renewable energy projects greater than 1MW.**





We believe the decision to pause renewable projects of greater than 1MW<sup>2</sup> is totally unnecessary, will threaten thousands of jobs, will increase electricity costs for all ratepayers, will stifle billions of dollars in investment, and will slow efforts to address climate change. We simply do not have time for these political games. We all need to work together for the collective good of the environment.

Alberta is the solar powerhouse of Canada, and we need to maintain our competitive edge. We need to continue to diversify our economy and our energy development. Our solar opportunities that we have here in Alberta do just that.

We understand that you have a number of concerns you are seeking to address<sup>3</sup>, below. *(We would add that these are the SAME concerns Albertans have regarding abandonment of oil and gas infrastructure – so we should apply a moratorium on that as well if we are being consistent. The irony is incredible.)*

- With respect to **land reclamation** concerns, please note that solar sites will remain viable well past the end of life of the original panels, and this will significantly reduce land reclamation needs. Additionally, The Government of Alberta already has reclamation [Guidelines for Renewable Energy Operations](#) which address this matter.
- With respect to **end of life** concerns for renewable energy infrastructure disposal, the Alberta Recycling Management Authority (ARMA) is already piloting reuse and recycle programs for solar PV. Given that the majority of solar being installed today will be in operation for well over 25 years, ARMA is really out ahead on this matter.
- With respect to **land use** concerns, such as food security, wetland preservation and wildlife conservation, Solar Alberta has already created highly relevant Solar Siting Recommendations: <https://solaralberta.ca/solar-siting-recommendations/>. We believe you could review and adopt protocols such as these without a pause on approvals.

If the Government of Alberta and the AUC are unwilling to immediately end the pause, we respectfully request that you continue to fully process new and existing excluded applications without issuing any approvals until after the pause period (Option 3 in your announcement).

Thank you for considering our request.

Sincerely,

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**To Whom it May Concern:**

On August 3, 2023, the Alberta government enacted the Generation Approvals Pause Regulation that required the Alberta Utilities Commission (“AUC”) to pause the approval process for all renewable projects over 1 MW. This unprecedented “pause” not only included new project filings but also impacted projects that had already filed Applications for AUC approval (“In-Flight”) under the current AUC Rule 007. As result of the “pause” the AUC has requested feedback from impacted stakeholders on processing alternatives for In-Flight applications during the “pause” period.

As background Proteus Power Developments LLC is the owner and developer of Proteus Alberta Solar 1 Ltd, Proteus Alberta Solar 2 Ltd and Proteus Alberta Solar 3 Ltd located near Hays, Alberta. These projects filed a single AUC application on July 10, 2023 (Proceeding 28325). On August 2, 2023, Proteus received its first Information Request from the AUC with a response due date of August 17, 2023 that has been submitted. As the AUC is fully aware the process of preparing the AUC application is a significant time and monetary commitment which includes extensive stakeholder engagement and environmental reviews. In response to your invitation for feedback Proteus offers its following preferred path forward for our Hays solar projects with recommendations for other In-Flight projects.

We firmly believe that all projects In-Flight should continue to be processed under current Rule 007, as existed at the time of the applications, including any deemed public hearing(s) and issuance of the final decision. We recognize this is not one of the alternatives that was presented for stakeholder feedback and is not in-line with the directive. However, we do believe it is the fairest to all parties involved and we would request that the AUC advocate this position with the Minister to revise his directive accordingly. Advocating for any other position unfairly burdens In-Flight projects with new unknown requirements when they followed all Rule 007 requirements in good faith at the time of their application. The uncertainty of the “pause”

period also comes with additional cost burden to the In-Flight projects as it delays their ability to finalize engineering and design work already underway and continue with project financing requirements which in-turn impacts the ultimate commercial viability of projects.

Proteus is not unsympathetic to the issues that are to be considered during this period, but at the same time recognizes there are current industry safeguards in place that responsibly developed projects have already considered and implemented. Proteus offers the following as specific examples related to our projects and for general considerations:

- With regards to the reclamation and decommissioning – The lease documents for the Proteus projects include specific commitments and require the posting of financial security to cover the cost of restoration and decommissioning at the end of their project lives. This type of security requirement could easily be implemented to ensure standard practice with future AUC directives.
- With regards to land use – The Proteus projects are located on marginal grazing lands that were relinquished back to the owner who made the decision to convert some of that land for crop development and lease the remainder for solar. Proteus has undertaken an extensive program of assessment and mitigations as represented in our AUC Application, including plans to implement agrivoltaic practice to encourage community sheep grazing and to provide regional pollinator enhancement from within the solar area. In general landowners, including those in the agricultural community, make an independent social and economic decision as to whether to enter into a land agreement to host a renewable energy project. Developers certainly do not have the ability to “force” any landowners to convert the current use to a future renewable host. Many projects are already allowing grazing of certain livestock on the property to local farmers to help preserve or in some cases increase acreage available for such purposes. With respect to land use concerns for wetland preservation and wildlife conservation, the Alberta Environment and Protected Areas (“AEPA”) have stringent guidelines that are enforced on the industry, and we don’t believe any additional AEPA regulations are required. Other public lands, pristine parkland and prime agricultural lands require more definition and should be considered through a proper engagement process, outside of the parameters of the “pause” process.
- Impact of increasing renewables on Alberta’s generation supply mix and electric reliability – Proteus, as with other developers, works closely with the AESO to follow all directives and requirements relating to the interconnection of the renewable generation. The AESO has control over the dispatch of the generation to assure stability and reliability of the transmission systems. We are confident that the AESO has and will continue to maintain the existing outstanding reliability of the transmission system including the implementation of a robust ancillary services market for energy storage. As part of the Western Electric Coordinating Council (WECC) the AESO is fully aware of the industry standards and addresses the potential issues presented by intermittent generating resources. As a final



point in the support letter to the Minister the AESO did not mention reliability, only the support for clarity on land use and reclamation issues. As with the others points, we do not believe this rises to a level of requiring a “pause”.

Proteus looks forward to a positive engagement with AUC to address the concerns highlighted by the government while at the same time maintaining fairness to those In-Flight projects in the AUC process.

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On August 3, the Government of Alberta announced a pause on approvals of renewable energy projects until February 29, 2024. During this pause, the Alberta Utilities Commission (AUC) has been directed to review and provide feedback on siting of renewable projects based on visual impact and agricultural impact and crown land along with reviewing the reclamation requirements and consider the impact of renewable energy projects on the Alberta Interconnected Electric System (AIES). The AUC has asked stakeholders to provide feedback on renewable energy projects that were planning to submit applications to the commission during this moratorium period.

ABO Wind (ABO) is a renewable energy developer with over 25 years of experience developing wind and solar projects across the world. ABO is active in 16 countries with over 3.7 GW of renewable energy projects connected to the grid. In 2017, ABO opened an office in Calgary to lead our Canadian developments. Alberta was initially selected as our home market in Canada due to the strong wind and solar resources and a stable regulatory regime that provides great opportunity for renewable development and investment. Since then, ABO Wind Canada has developed the 514MW Buffalo Plains Wind Farm, the largest single-phase project wind energy project in Canada and seen our team grow and expand into other Canadian markets. ABO has three wind and one solar energy project under development in Alberta, which were planned to be submitted to the AUC during the recently announced moratorium period. These projects represent over \$3 million of investment to date and over \$1 billion of investment once operational. Furthermore, ABO is in the process of siting and signing lands for an additional potential of 300 MW of future wind and solar projects.

### **Feedback:**

AUC Rule 007 and Rule 012 are the primary regulations which lead responsible renewable energy development in Alberta. Both regulations have evolved over time with multiple iterations coming into effect. Previous iterations of the AUC Rules have been preceded by rounds of stakeholder consultation and review, which have resulted in the most stringent requirements in Canada. In other Canadian markets, we have seen that regulators will often use the AUC guidelines to regulate best practices in the industry.

Renewable energy development requires a lengthy permitting timeline, which includes finding and securing viable sites with supportive landowners, conducting and reporting on environmental features, consulting and engaging with stakeholders and communities, and conducting grid connection studies with the Alberta Electric System Operator (AESO), among others. ABO is accustomed to changing regulatory environments around the world and appreciates that regulation must evolve to ensure development can occur in a responsible manner. However, development requires consistency and clear timelines to adapt to any regulatory changes to reduce risk to the developer.

The pause in AUC approvals also puts at risk the Commercial Operation Date (COD) for all our projects that have been submitted and studied with the AESO. We have developed the COD for our projects with considerations and contingencies for delays, however if projects are unable to submit for their AUC permit until February 29, 2024 there is a risk that the COD will have to be modified, which introduces risk of the grid conditions changing, and ultimately could result in reduced project capacity.

To date, renewable energy developers have not seen any indication of what the outcomes of the AUC inquiry will lead to. Our projects have been developed and sited in accordance with all current applicable AUC regulations and sited on previously disturbed agricultural land with the full support of the landowners. If these projects are not allowed to submit for AUC applications during this pause on approvals, ABO is left in a position without guiding regulations to develop projects and without certainty on if existing field study plans, project designs, and stakeholder consultations will be valid. An indication how regulations may change will be required for ABO to have any certainty on if or how our current developments would need to change to address upcoming regulations.

### Closing:

In closing, ABO respectfully requests that the AUC allow projects that are under development to submit to the AUC permitting process under the current Rule 007 prior to February 29, 2024, and that the pause is limited and allows for grandfathering for current developments that have past certain milestones in the development and permitting process. This will provide developers with the confidence to continue investing in their existing projects while providing an opportunity for future developments to align with any new requirements that are developed as a result of the AUC inquiry.

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I am writing to express my full support for the current six-month pause on the approval of power plants in Alberta. As a stakeholder deeply invested in the energy sector of our province, I firmly believe that the concerns and inquiry points being examined by the Alberta Utilities Commission (AUC) are pivotal to the long-term success of renewable energy development in Alberta. This pause allows us the opportunity to thoroughly evaluate the implications and ensure the most effective strategies are implemented.

As an Alberta based solar company, we may be affected more than most by the inquiry pause but we still feel it is vital to get this process right. But as vital as this pause and review is, it is just as vital that the AUC consider all options available to make the renewables industry in Alberta a true success story. I will outline later some successful options and programs we have seen in other parts of Canada and the USA that would solve many of the concerns the inquiry is looking at.

Why I say we may be highly affected by the inquiry pause is that not only are we a solar project developer but we are also an Alberta based manufacturer of solar racking systems. We are the only Canadian solar racking manufacturer of the full line of ground mounted solar systems. So, not only are our potential projects being paused but this could also impact our future sales. Even with all this said we feel strongly the review is necessary and vital that we get this process correct. Most of our solar business is on the rural and farm areas so we also have a first hand feel of the concerns of the rural community and believe their concerns are valid.

Azgard Solar, a part of Azgard Corp, has been in the energy business based in Calgary for over 40 years. We have worked on pipelines around the world and in the oil and gas refinery business all across Canada. We added solar power to our energy portfolio about 12 years ago and since then we have made the success transition to a fully renewable energy company. We have built solar projects throughout Canada and our solar racking systems have been used all across Canada and into the USA.

The concerns raised about land classification, viewscales, reclamation, and the use of prime agricultural land have been amplified not solely due to the rapid growth of renewables in Alberta but also due to the current regulatory and permitting framework that has inadvertently propelled this type of development. I must point out that while the renewables sector is expanding, the existing regulations are failing to adequately accommodate smaller, community-based projects.

Every month receive inquiries by local farmers, land owners or invertors that would like to build solar projects or invest in renewable in Alberta. Unfortunately, we have to advise them that unless they are willing to invest in a mega project the current regulations do not support locally owned solar or renewable project development, here is why.

As you know there are mainly two steams for solar and renewable power development in Alberta, Micro-generation and Distributed generation. The costs and timelines for the connections, studies and approvals is what is making the local and community projects unviable and greatly favors the mega solar projects. These mega projects are increasingly foreign controlled companies and are the source of most of the concerns under the AUC review.

As an example, a distributed generation solar project over 150 kW, whether it is 150 kW or 200 MW take basically the same amount of time and money to go through the regulatory and connection process.

A 150 kW project can cost in the neighborhood of \$100,000 in Utility connection studies and processes and take close to two years to complete the approval process. Much of this money is required to be spent without knowing if you are able to get the connection for a solar system or if the connection costs make the project unviable.

A 100 MW project has a similar \$100,000 connection study and process costs.

If you are building a 150 kW solar system project it may cost about \$200,000. Now add into that the \$100,000 connection costs and this makes the project unviable. On most projects under 5 MW this excessive connection cost make the financial numbers not workable.

This is why you are seeing most of the distributed generation solar projects being developed as the large mega project.

The farmer who has 5 acres of nonproductive land and would like to build a 1 MW solar project on his farm is completely shut out due to the current costs and connection regulations.

In other jurisdictions we have seen programs that have limited the land use pitfalls and have engaged the local communities and benefitted them long term in the development of renewable energy.

Here are some recommendations and reasons why we believe they will work for all Albertans:

Make the development of a 5 MW or less solar or renewable project a simpler and less costly application process.

- Minnesota has a community solar program for projects under 5 MW in which the application process is about 6 month and costs are \$10,000 - \$20,000
- The advantage of this size project of 5 MW or less is that it is more likely none productive land can be used, ie the corner of an irrigated field that is not used due to the irrigation reach.
- The farmer can generate addition income from his land and help sustain his farm operation, thus enabling continued local food production.
- The farmer owns the land and his project so he is likely to find ways to fully utilize the land the solar project sits on, whether it is livestock grazing or secondary crops, the farmer is the best person to manage the land. Mega solar projects do not typically want anyone else on the property due to liability issues and the fact it is not their land and they are not likely from the community.
- If a solar project is landowner or community owned the future reclamation of the site is more likely to be planned into the design of the solar system, again because it their land and their community and they care deeply about it.
- Through our discussions with municipalities, it has become very apparent that the municipalities have a high preference for 20 – 5 MW projects, which sit on only 3-4 acres each vs a large 100 MW project that can take up 100's of acres. The visual disturbance of the smaller projects is almost non noticeable when constructed correctly. With 20 – 5 MW projects you have 20 Alberta landowners or communities who are benefiting from the solar projects and creating income and revenue for the local community not just foreign investor.



Wildlife habitat is maintained and often enhanced with smaller solar projects. The mega solar projects often cut and spray vegetation in a none sustainable method.

- The smaller solar projects typically do not need additional power lines or system upgrades while the mega projects need additional power lines and substation built which takes away more of the valuable land and create landowner resentment.
- Having 20 – 5 MW project spread across the province is also better for the operation and stability of the power grid system than having one 100 MW project at a single location.
- Smaller projects give Albertian a better chance at investing in their own province and community and to benefiting long term from the renewable energy boom.

Alberta has done a fantastic job in making our economic environment one of the most attractive locations not just in Canada but in North America and even around the world for renewable power investment. We in Alberta are OK in competing with anyone in the world as long as the rules are the same for everyone. Currently the connection costs and process dramatically favor the mega solar projects. A solution is to lower these costs and timelines as they typically have a less of an impact on the electricity grid system and do not need as in-depth study as larger projects. Another option to consider, is to implement a price per developed kW as the costs for project development. This would be fair for any size renewable project, similar to the flat tax idea.

As I have mentioned, Azgard Solar mainly focuses on renewable projects in the rural and farming business areas and our recommendations are as follows:

1. Develop a streamlined, less costly approval process for renewable project that are 5 MW or less,
  - Many USA states have this system. As well, Ontario recognized the value of a streamlined process for smaller projects which worked well at the time.
2. Develop a Community Renewable program that would not only make it viable for communities to develop and benefit from renewable projects but also allow individual Albertian to invest in renewable projects as a co-op or community project. Minnesota has a program that has worked very well.
3. Complete abeyance: The AUC does not accept new applications during the pause period and all existing excluded applications will be placed in abeyance during the pause period with the AUC taking no further steps to complete their record or issue decisions.

Thank you for your time and consideration of the concerns many Albertans and Alberta companies have. I believe the common thread whether someone is for or opposed to the pause and review, is that we are all concerned for the welfare of Alberta long term. Please feel free to contact me anytime if you would like additional input or clarification on any details.

Thank you,

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I am writing as a concerned Albertan resident in response to your stakeholder feedback request, dated August 3, 2023<sup>1</sup>. **I respectfully request that the AUC end the pause and immediately recommence approvals for renewable energy projects greater than 1MW.** I believe the decision to pause renewable projects of greater than 1MW<sup>2</sup> is unnecessary, will threaten thousands of jobs, will increase electricity costs for all ratepayers, will stifle billions of dollars in investment, and will slow efforts to address climate change. Alberta is the solar powerhouse of Canada, and we need to maintain our competitive edge.

I understand that you have a number of concerns you are seeking to address<sup>3</sup>:

- With respect to **land reclamation** concerns, please note that solar sites will remain viable well past the end of life of the original panels, and this will significantly reduce land reclamation needs. Additionally, The Government of Alberta already has reclamation [Guidelines for Renewable Energy Operations](#) which address this matter.
- With respect to **end of life** concerns for renewable energy infrastructure disposal, the Alberta Recycling Management Authority (ARMA) is already piloting reuse and recycle programs for solar PV. Given that the majority of solar being installed today will be in operation for well over 25 years, ARMA is really out ahead on this matter.
- With respect to **land use** concerns, such as food security, wetland preservation and wildlife conservation, Solar Alberta has already created highly relevant Solar Siting Recommendations: <https://solaralberta.ca/solar-siting-recommendations/>. I believe you could review and adopt protocols such as these without a pause on approvals.

If the Government of Alberta and the AUC are unwilling to immediately end the pause, I respectfully request that you continue to fully process new and existing excluded applications without issuing any approvals until after the pause period (Option 3 in your announcement).

Thank you for considering my request.

Sincerely,

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Thank you for considering my request.

Sincerely,

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Dear AUC,

I was hoping to provide feedback on the renewable energy pause for wind and solar projects over 1 megawatt until February 2024.

I believe that the response to concerns over renewables has been a let down by the province and threatens an industry growing at 10% a year.

Thousands of jobs are at stake, along with \$25Billion of investment funds.

While I understand the need to ensure renewable energy is sustainable for our power grid, I think the freeze on new projects is an overreaction from the province.

**THEREFORE THIS MORATORIUM MUST BE RESCINDED IMMEDIATELY.**

I don't think it's too much to ask this government to be FAIR and apply the same rules across ALL energy industries in AB.

The fact that we need the OWA and STILL have BILLIONS OF DOLLARS of oil/gas reclamation liabilities that have been mismanaged for decades by this government only further reinforces their very intentional duplicity and hypocrisy. It must end NOW.

Albertans and especially Calgarians are paying the highest electricity rates in the country. Renewable energy generation drives down prices, hour by hour. (I worked at ENMAX for 2 years!)

I don't want more rebates from this government. I want fair and competitive market policies enacted and enforced so that ALL generators can earn a fair return and ALL polluters pay to clean up their own messes --- and NOT the taxpayer via corporate welfare programs such as RStar!



I hope that you can redirect my feedback to the appropriate address before the deadline if this belongs in a different inbox. I would also encourage you to extend the window for feedback, and make the address for feedback easier to find through a website search.

Regards,

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Thanks for the opportunity to provide feedback on the upcoming inquiry into renewable energy development in Alberta. Incorporated in 2018, Kiwetinohk (KEC) is an Alberta-based, publicly traded energy company, building an energy transition business to serve Albertans. Kiwetinohk's scope of business includes renewable power generation as well as natural gas and light oil production, natural gas-fired power generation, carbon capture and storage (CCS) and blue hydrogen development.

Kiwetinohk believes climate change calls for urgent action to reduce greenhouse gas emissions. The response to that urgency needs to include natural gas-fired power generation, where practical and economical with CCS, alongside renewables, at least until technology to provide reliable power via renewables, alone, is invented and commercialized. Kiwetinohk has solar projects at various stages of development and at various stages in the regulatory process. Although we are a natural gas production company and planning more than 1 GW of natural gas fired generation projects, we believe Alberta's strong solar production is also an important part of an affordable and clean energy mix.

Clean, affordable electricity has the potential to be Alberta's new major competitive advantage. Innovative, responsible, efficient and effective regulation will enable us to lead in solar, natural gas, CCUS, small modular reactors, and push industry toward development strategies that are the safest, most cost effective and cleanest in North America. As the AUC implements this pause and responds to the government's line of inquiry, we hope you embrace fully the principles of regulatory innovation and use this as an opportunity to build out the systems that will form the foundation of Alberta's electric advantage.

We are eager to provide the following recommendations to get the AUC solar project review process back up and running and to minimize the loss of confidence in Alberta's power market, regulatory regime and overall investment environment.

#### *Approval Hold Only, Continue Reviews*

KEC recommends the Commission implement only an Approval Hold and continue to fully process all new and existing applications during the pause period. This option most effectively deploys the Commission's and the Alberta Electric System Operator's (AESO) resources and will ensure the Commission and AESO are prepared to continue approvals once the pause is lifted on February 29, 2023.

Given concerns regarding a large influx in applications upon completion of the upcoming AESO "Cluster Study" for connections, continuing to process new and existing applications reduces the risk the AUC will need to manage two significant bottlenecks of applications in 2024.

*Expedite the Inquiry Report, Make Process Transparent*

Currently there is misalignment between the end of the Pause on February 29, 2024 and the March 29 deadline for the Inquiry report. This creates a risk for any existing excluded application as those receiving approvals prior to March 29 will not be impacted by any Inquiry outcomes, while those being considered after March 29 may risk significant changes to the process.

To ensure fairness among all existing applications, the AUC should also commit to a February 29 completion of the Inquiry report. This will ensure that all projects will be adjudicated according to the same standards. Given the vague timelines and process announced for development of any new policies, the AUC's report to government should also be issued publicly so regulator recommendations are clear to Albertans and can be distinguished from any government policy changes. Alberta has been known for decades globally for its regulatory expertise. Releasing the Inquiry report publicly will help maintain confidence in expert oversight.

*Grandfathering Approach for New and Existing Applications*

We have considerable concern regarding the impact of the Inquiry on applications we had, in good faith and in accordance with regulation, invested cash and human resources in for advance planning, site acquisition and environmental and engineering studies, with intent to file during the coming months, which is now the Pause period. Efforts should be made to provide certainty for these projects as the AUC performs the upcoming inquiry, so projects delayed by the Pause are not further delayed by, or need to bear additional technical or other costs associated with, implementation of new policy.

We recommend the Commission grandfather the current *Rule 007* approach for any applications filed prior to the release of the Inquiry report. This approach is consistent with previous *AUC Rule 007* amendments over the last decade, in which there is a clear "effective by" date included with any amendments. Any applications filed prior to this date may follow the process outlined in the then-current version of the Rule.

Due to the Pause and the wide-ranging approach to the inquiry, electricity generation project developers are entering a time of unprecedented uncertainty. By grandfathering *Rule 007* for applications that will be filed prior to the end of the pause, the AUC can maintain at least some level of predictability for projects, and our industry's investors, who may otherwise deploy capital elsewhere.

*Reward Responsible Development, Adoption of Best Practices, e.g. Agrivoltaics*

Finally, the inquiry covers a wide range of issues facing the renewable energy industry and the communities in which we operate. As a result, there are a number of issues that may be resolved more easily and more quickly than others. We recommend the Commission organize and schedule the inquiry such that "low hanging fruit," that is to say, areas where adoption of best practices into regulation, can be managed and accelerated more quickly, with preliminary findings for these issues be released on a more expedited basis.

In addition, projects that are not using irrigated land, are not obstructing pristine landscapes and have reclamation bonding in place in their land lease agreements should be enabled to proceed as fast as possible. The AUC should also consider an expedited process for projects with energy storage on site ("hybrid projects") or projects proposed by developers that are also proposing efficient, natural gas-fired "peaker" projects, given each of these measures will help with system reliability concerns.

Similarly, the Commission should accelerate adoption of standards for agrivoltaics, the practice of integrating agricultural activities into PV solar projects to maximize productivity from the land. Developers who integrate and maintain crops, livestock, pollinators and other agricultural activities as part of their projects, thereby protecting the soil, innovating new practices, creating jobs, and producing valuable food products, should move more quickly through the regulatory process. Developers who do not include a level of agricultural focus should be more closely examined.

#### *Private Property Rights*

We also urge the Commission to consider how its recommendations may impact Albertan's property values and property rights. The discussion around Crown land is important but not a silver bullet. Alberta Crown land is largely forested or consists of native prairie grasslands, neither of which are suited to solar development. Managing impacts to private property rights and land values in AUC recommendations will be an important consideration.

Thank you once again for the opportunity to provide feedback on the development of the approach to your Inquiry. The pause has cast a long dark shadow on Alberta's reputation as a place to invest and for regulatory certainty, and it is critical that it be lifted as soon as possible. Without further information regarding the Inquiry or details from the report, our industry's future in Alberta is in question.

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## **Introduction**

We write in response to the Alberta Utilities Commission's ("AUC") announcement dated August 3, 2023, regarding the AUC's inquiry on the development of electricity generation in Alberta ("Inquiry") and pause on approvals of renewable electricity development applications until February 29, 2024 ("Pause").<sup>1</sup> The Government of Alberta ("Alberta") directed the AUC to hold the Inquiry and implemented the Pause through two orders-in-council, approved on August 2, 2023. The AUC's announcement requests stakeholder feedback on three options for implementing the Pause: (1) complete abeyance; (2) partial abeyance; and (3) approval hold only. Additionally, the announcement invited stakeholders to propose other options for the Pause.

## **MNA's Position on the Pause and Options for its Implementation**

The Métis Nation of Alberta ("MNA") remains committed to the responsible development of renewable electricity and is currently assessing the impact of the Pause on our over 60,000 Métis citizens, their communities, MNA businesses, and other partner businesses and organizations. We share Alberta's concerns regarding the integrity of the environment and support a review process designed to ensure renewable electricity development is carried out in a sustainable, efficient, and environmentally conscious manner. However, we do not believe the AUC Inquiry should be accompanied by a nearly seven-month Pause on approvals of renewable electricity development applications. The MNA requests that Alberta rescind the Pause while engaging with renewable electricity stakeholders, including the MNA, through the AUC Inquiry.

The MNA views renewable electricity projects as a key avenue to increase our energy sovereignty, while also delivering on our commitment to our citizens to undertake climate initiatives that reduce greenhouse gas emissions and create capacity and economic opportunities for Métis citizens. Since 2017, as part of our MNA Climate Change Action Plan, we have diversified our portfolio of and continue to seek partnerships on renewable electricity projects. Our Nation owns a soon-to-be operational 4.86-megawatt solar project at Métis Crossing, the Métis Crossing Solar Project ("MCSP"), and a micro-generation solar portfolio composed of 37 sites across Alberta. Thankfully, these projects will not be impacted by the Pause, as the MCSP has already received AUC approval, and our micro-generation portfolio is exempt from the Pause. We are concerned that the Pause may impact new and existing partnerships on renewable electricity projects and related economic opportunities for the MNA and Métis citizens.

Should the Pause proceed, it must be an approval hold only (AUC's proposed option 3 for implementing the Pause). It is crucial that the AUC continue to fully process new and existing applications during the Pause to minimize its impact on renewable electricity projects and their stakeholders as much as possible.

## **The MNA Requests to Participate Fully in the Inquiry**

The MNA requests to participate fully in the rest of the AUC's Inquiry. The MNA is the exclusive, authorized representative of over 60,000 Métis citizens and is mandated to represent our citizens and their regional rights-bearing Métis communities in relation to their collectively held Métis rights protected by section 35 of the *Constitution Act, 1982* ("Section 35").<sup>2</sup> Alberta has a constitutional duty to consult, and if necessary, accommodate Aboriginal groups before it makes decisions that have the potential to impact the Aboriginal group's Section 35 rights. This duty to consult attaches to AUC approval decisions,<sup>3</sup> as well as "strategic, higher level decisions," including inquiries on electricity transmission,<sup>4</sup> or in this case, an "an inquiry into the ongoing economic, orderly and efficient development of electricity generation in Alberta."<sup>5</sup>

The Inquiry will shape how Alberta regulates the development of electricity generation in this province on a go-forward basis. We recognize that there will continue to be energy and electricity generation projects in this province, and we support sustainable development. However, climate change poses a disproportionate threat to Indigenous peoples, including Métis, due to our dependence upon and close relationship with the land and its resources. We have a vested interest in ensuring energy development in Alberta is conducted in the most sustainable way and with the least environmental impact possible. The MNA must have a seat at the Inquiry table to ensure that Alberta considers the Métis perspective in its future direction for the development of electricity generation. The continuity of our way of life and the exercise of our Métis Section 35 rights depends on it.

We look forward to receiving notice of all opportunities to participate in the Inquiry and any related processes in due course.

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Dear AUC Members,

I am writing as a concerned Albertan resident in response to your stakeholder feedback request, dated August 3, 2023. **I respectfully request that the AUC end the pause and immediately recommence approvals for renewable energy projects greater than 1MW.** I believe the decision to pause renewable projects of greater than 1MW is unnecessary, will threaten thousands of jobs, will increase electricity costs for all ratepayers, will stifle billions of dollars in investment, and will slow efforts to address climate change. Alberta is the solar powerhouse of Canada, and we need to maintain our competitive edge.

I understand that you have a number of concerns you are seeking to address:

- With respect to **land reclamation** concerns, please note that solar sites will remain viable well past the end of life of the original panels, and this will significantly reduce land





# AUC

Alberta Utilities Commission

reclamation needs. Additionally, The Government of Alberta already has reclamation guidelines which address this matter.

- With respect to **end of life** concerns for renewable energy infrastructure disposal, the Alberta Recycling Management Authority (ARMA) is already piloting reuse and recycle programs for solar PV. Given that the majority of solar being installed today will be in operation for well over 25 years, ARMA is really out ahead on this matter.
- With respect to **land use** concerns, such as food security, wetland preservation and wildlife conservation, Solar Alberta has already created highly relevant Solar Siting Recommendations. I believe you could review and adopt protocols such as these without a pause on approvals.

If the Government of Alberta and the AUC are unwilling to immediately end the pause, I respectfully request that you continue to fully process new and existing excluded applications without issuing any approvals until after the pause period (Option 3 in your announcement).

Thank you for considering my request.

Sincerely,

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**RE: Feedback on implementation of pause on approvals for new renewable electricity generation**

Thank you for the opportunity to provide feedback and suggestions on implementing the approval pause mandated by OiC 172/2023. Further, we thank you for taking the initiative to address development on high value agricultural lands and mandatory reclamation security as outlined in the Commission's July 21, 2023 letter to Minister Neudorf.

## About Us

ASCENT Energy Partners Ltd. is an energy industry consulting company focused on Alberta's transition of business and the economy to a new mix of traditional, renewable, and alternative energy. Our team participates in the development and permitting of multiple renewable energy projects, including numerous consultations with rural and urban municipalities, landowners and residents, Indigenous communities, and regulatory agencies. We have also engaged in various proceedings and inquiries both independently and on behalf of project proponents.

While we do not agree with the need for an approval pause to address these matters, ASCENT applauds the examination and clarification of the topics of the directed inquiry. We further appreciate the Commission's request for feedback, alternative proposals for implementation, and the opportunity to share rationale for our proposal. As active development consultants and practitioners, we at ASCENT have considered the implementation of pause on approvals carefully and strongly encourage the Commission to consider **Approval Hold with Adjustments** (described more fully below).

## Concerns with Full and Partial Abeyance

We believe that complete suspension of applications and a moratorium on accepting new applications during the pause period will do irreparable and avoidable harm to all stakeholders and the public interest. In particular this approach:

- Builds a "glut" of application processing work that will draw out timelines and create delay that ripples through balance of the project lifecycle including fundraising and financing, Final Investment Decisions, procurement, contracting, construction, commissioning, and energization;
- Is likely to result in the inefficient use of the Commission's resources as reduced demand on in the short term followed by very high demands in the months following the pause may place undue strain on Commission staff, Commissioners and associated resources;
- Further disrupts the careful alignment of development advancement – particularly of the Rule 007 power plant application process to the AESO connection/cluster studies, GUOC payment, and interconnection facility approval process, which was recently streamlined to improve

technical efficiency and processing timelines and is NOT being paused while the inquiry proceeds; and

- Signals prolonged uncertainty to proponents, workers, employers, investors, and lenders that will deter investment and migration to Alberta in favour of other provinces and international jurisdictions.

On the other hand, Partial Abeyance prescribes continued processing but excludes a public hearing. Given the uncertainty created by the pause and inquiry, not all proponents will have the same level of comfort with proceeding in this way; some may prefer to pause, while others may prefer to proceed as far as possible. This may be addressed with the insertion of two proponent elections, outlined below.

### Approval Hold with Adjustments

In the interest of advancing the vibrant work of Alberta's energy transition, we suggest implementing the pause on approvals using Approval Hold with the addition of:

- a "voluntary pause" election for existing applications (where the proponent prefers to suspend processing pending the inquiry outcome) and
- a "request to adjourn hearing" for contested applications (where the proponent prefers to adjourn a hearing during the pause in approvals).

A proponent's option to request an adjournment of the proceeding aligns with our observations of standard AUC practice, which has been to grant specified adjournments at the request of proponents who seek to address issues (such as environmental studies and stakeholder consultation) outside the AUC process and prior to the further processing of their applications.

The modified text of the Approval Hold with Adjustments might read as follows:

*The AUC continues to fully process new and, with the consent of the proponent, existing excluded applications up to the completion of the record without issuing any approvals until after the pause period. Where applicable and unless otherwise requested by the proponent, contested applications may proceed to a public hearing and, upon completion of the record, will be placed in abeyance until the pause period expires.*

### Benefits of Approval Hold with Adjustments

We believe that this approach will provide many benefits to the AUC, stakeholders, proponents, and the public interest as follows:

- Permit AUC staff to continue to intake, process, and review applications for completeness and compliance, preserve the information request and evidence process, and provide public review and participation – allowing for the efficient use of AUC resources and dramatically reducing the "backlog" of application processing and reducing the "glut" that will otherwise ripple across the industry and economy;
- Minimize the extent of timing differences in the development process;
- Provide applicants valuable feedback and permit application completion;
- Provide proponents with the choice to proceed in this modified application process or, as they see fit, delay application or hearing until after the completion of the pause;
- Provide a means of risk management to proponents who may elect to pause, proceed partially, or proceed as fully as possible;

- Provide a credible signal that, within an obvious constraint, the AUC continues to deliver efficient regulatory solutions in a fair, open, and transparent manner – buttressing confidence that this inquiry will provide the greater clarity promised while minimizing the damaging impacts of interim regulatory uncertainty.

### Why Approval Hold with Adjustments will serve the Public Interest

Though we do not agree that an approval pause is necessary to address the topics of the directed inquiry, in our consultations with rural stakeholders and municipalities we have certainly encountered these concerns (and many others) and observed a variety of approaches to resolution and mitigation by proponents. While our visibility is not exhaustive, we see that:

- Proactive project proponents are actively engaging on agricultural land consideration, viewscape concerns, reclamation security, and grid capacity implications of siting and recognize the value of the inquiry and resulting clarity; and
- The AESO is many years into earnest efforts to manage and prepare the grid for the evolving supply mix, examining best practices of other jurisdictions and innovating here in Alberta to suit our unique circumstances.

We are confident that the fundamental goals of regulators, municipalities, and proponents are aligned – to deliver well-sited, responsibly developed projects that fit into the local community and infrastructure and deliver cost effective, reliable energy to fuel Alberta’s future.

Approval Hold with Adjustments will allow proactive proponents with solid, promising projects to continue with development and regulatory assessment (short of project approval) and foster precisely the outcome that the pause is intended to achieve – while preserving the freedom of proponents to choose how they accelerate or delay their efforts based on their confidence in the projects to thrive in the post-inquiry regulatory regime.

### Next Steps

We at ASCENT look forward to learning more about the upcoming inquiry and encourage the Commission to enable participation as broadly as possible within the mandate and practical limitations. We consider this a pivotal moment in Alberta’s evolution as an energy driven economy and believe strongly that there are simple, practical policy and legislative adjustments that can be made to enable ongoing investment and generation growth without sacrificing the other values we all hold dear.

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Re: **AESO Comment on Approval Pause Optionality**

The Alberta Utilities Commission (the “Commission”) has requested that interested parties provide feedback on three options for implementing the pause on project approvals pursuant to the *Generation Approvals Pause Regulation*, Alta Reg 108/2023 (the “Approvals Pause Regulation”). This pause affects approvals under Sections 9 and 11 of the *Hydro and Electric Energy Act*, RSA 2000 c. H-16 for renewable and hydro generation projects (the “Impacted Projects”) in order to facilitate an inquiry into the ongoing economic, orderly and efficient development and operation, in the public interest, of electricity generation in Alberta, pursuant to O.C. 171/2023 (the “Inquiry”). The three pause implementation options are:

- **Complete Abeyance:** The Commission does not accept new applications during the pause period and all existing excluded applications will be placed in abeyance during the pause period.
- **Partial Abeyance:** The Commission does not accept new applications during the pause period. For all existing applications with an incomplete record, the Commission process will proceed to the point where the written evidence is complete, applications will then be placed in abeyance. Public hearings for these applications will not be held and existing applications with a complete record will be placed in abeyance.
- **Approval Hold:** The Commission continues to fully process new and existing excluded applications without issuing approvals until after the pause period.

The AESO has assessed each of the pause implementation options within the context of the AESO’s process for facilitating system access service to the transmission system (the “Connection Process”) and concluded that the Approval Hold option would have the fewest impacts on this process. The AESO’s assessment is restricted to projects in the AESO Connection Process associated with Impacted Projects.

## **BACKGROUND**

The Connection Process is the AESO’s business practice for facilitating system access service. While the Commission process for reviewing a power plant application (“PPA”) and issuing a power plant approval (“PP Approval”) is distinctly separate, there are important interdependencies with the AESO’s Connection Process. The relationships between the PPA, PP Approval, and the Connection Process are as follows:

- **Connection Process:** PPA filing, or an existing PP Approval is a required deliverable of the Market Participant to exit Stage 3 of the Connection Process. In addition, PP Approval is a required deliverable for projects to move into Stage 5 of the Connection Process.
- **Behind The Fence (“BTF”) Process:** PP Approval is required for projects to move into Stage 5 of the Connection Process.

### *The Connection Process*

The AESO utilizes a seven-stage process to connect new generation projects that require the expansion or enhancement of the transmission system. Projects move between stages by completing deliverables within timelines set out by the AESO. The AESO utilizes stage gates and established timelines to ensure that the conditions necessary for success in a subsequent stage are satisfied before a project moves forward, allowing projects to move through the process in an efficient and timely manner.

The Connection Process stages are as follows:

- Stages 0 and 1 focus on the nature and scope of the new project. Market participants complete their system access service request and provide necessary information to the AESO in Stage 0. In Stage 1, the AESO defines the scope of the required engineering studies.
- Stage 2 sees the AESO assess various connection possibilities for the project.
- Stage 3 focuses on preparation for the regulatory process. If the market participant does not already have a filed PPA or PP Approval, the MP files its PPA with the Commission. Following this, the AESO can proceed with needs approval, either by filing a needs identification document (“NID”) with the Commission or issuing an approval pursuant to Section 501.3 of the ISO Rules, *Abbreviated Needs Approval Process* (“ANAP”). For projects without an existing PP Approval, the AESO does not proceed with needs approval until a PPA has been filed. Finally, in Stage 3 the market participant provides evidence of ability pay the Generating Unit Owner’s Contribution (“GUOC”), executes the applicable System Access Service Agreements (“SAS Agreements”), and the AESO directs a Transmission Facility Owner (“TFO”) to file its facility application.
- Stage 4 addresses the Commission’s review of the AESO’s NID, TFO’s facility application and the PPA (if filed concurrently).
- Stages 5 and 6 are concerned with construction and closeout.

### *BTF Process*

Generation projects that follow the BTF process include distribution connected generation or additions to existing generation facilities that do not require the expansion or enhancement of the transmission system. The process for Stages 0, 1 and 2 mirrors the Connection process. However, since no needs approval is required, market participants require an executed SAS Agreement, GUOC payment, and PP Approval to exit Stage 3/4 and commence Stage 5.

### *Cluster Assessment Studies*

Commencing in September 2023, the AESO will begin assessing projects in the connection and BTF processes using a cluster study methodology. The AESO’s cluster assessment process is designed to achieve greater efficiencies in the AESO’s connection process, minimize the number of restudies required and discourage market participants from cancelling projects in stage 2 and beyond. This approach to transmission planning sees the AESO batch projects together to assess the impact simultaneously.

- The overall duration of Stage 3 may be increased.

There are currently five Impacted Projects in the Connection Process that may advance through Stage 3 and into Stage 4 during the pause period as PPAs have already been filed, and therefore the AESO could file NID applications, issue ANAP approvals, and direct TFOs to file facility applications for these projects. Nonetheless, these projects may experience delays in Stage 4 because no PP Approvals would be issued. As a result, the AESO expects the Commission would not issue approvals for any associated NID and facility applications. Similar to Stage 3, delays in Stage 4 may impact project ISDs.

Finally, the Complete Abeyance option presents the greatest risk that the AESO will face resourcing constraints upon the resumption of the approval process, as there may be a backlog of projects qualified to exit Stage 3 once the Commission resumes acceptance of PPAs.

### **Behind the Fence Projects**

There are currently six BTF projects in Stages 2 and 3/4 without PP Approval. Under the complete abeyance scenario, these projects would not be able to exit Stage 3/4 of the BTF process because a PP Approval is required to enter Stage 5. Ultimately, ISDs may be delayed as a result.

### *Partial Abeyance*

As the partial abeyance option does not allow for the submission or approval of new power plant applications, the impacts to AESO Connection and BTF projects are expected to be similar to the complete abeyance option. However, temporal impacts on stage durations and project ISDs may be reduced if PP Approvals are issued sooner at the end of the pause period, compared to the complete abeyance option, as the Commission would proceed with processing existing applications to the point where the written evidence is complete.

### *Approval Hold*

#### **Connection Projects**

Compared to the complete and partial abeyance options, the approval hold option, in which the Commission would continue to accept and fully process power plant applications during the pause period, would have the least impact to AESO Connection projects, as it would allow projects to continue to pass through Stage 3 of the Connection Process and advance Stage 4 activities. Consequently, the AESO would be able to file NID applications or issue ANAP approvals, and direct TFOs to file facility applications. This would result in a more typical allocation of resources by the AESO both through the pause period and thereafter.

Depending on the progress of a particular project at the time of the pause it is expected that the duration of Stage 4 may still increase for certain market participants as Impacted Projects wait for PP Approval. It is further expected that NID and facility application approval would be delayed until PP Approval is issued. Accordingly, there remains a risk of ISD delay. However, because this risk is contingent on PP Approval, it is common to all three options. Under this option, the magnitude of the impact on project ISDs and Stage 4 durations may be reduced, as the Commission would continue to fully process applications under the Approval Hold option.

The Approval Hold option also includes a somewhat heightened risk of lost work if filed PPAs are denied or withdrawn following the outcome the Inquiry, resulting in the NID and facility application also being denied or withdrawn. This risk is however counterbalanced by the progress made in the Connection Process allowed under the Approval Hold option.

As communicated to stakeholders, the AESO will be continuing to conduct intake for the cluster studies according to the previously published schedules. Similarly, the criteria and deadlines for projects that wish to remain in the existing Connection and BTF processes beyond September 1 remain unchanged.

While the AESO does not anticipate differences in how the three implementation options would impact the cluster assessment process, certain key cluster process milestones overlap with the Inquiry timelines. Specifically, market participants will be required to pay fees to the AESO and make other financial commitments such as the payment of GUOC or the provision of GUOC evidence (as depicted in Attachment A):

- prior to February 2024, market participants in Cluster 1 will commit to entering into Stage 2; and
- prior to July 2024, market participants in Cluster 1 will commit to entering into Stage 3, and new market participants will submit applications for acceptance into Cluster 2.

The AESO is committed to moving market participants expeditiously through the first cluster assessment. It is important that as much information be put onto the record of the inquiry as early as possible to allow market participants to assess potential outcomes and reduce the risk of project cancellation in or beyond Stage 2, as cancellations may result in the need for re-study.

## OPTION ASSESSMENT

With respect to the pause implementation options, the AESO anticipates that Stages 3 and 4 will be impacted for both Connection and BTF projects. To the extent possible the AESO will work with market participants to mitigate impacts on individual projects. Such mitigations include an available seven-month extension to Stage 3 maximum timelines for projects without PP approval.<sup>1</sup> Therefore, the below analysis assumes that AESO mitigations have taken place.

### *Complete Abeyance*

#### **Connection Projects**

A complete abeyance would result in connection projects without a filed or previously approved PPA being unable to exit Stage 3 and progress through Stage 4 during the pause because having a filed or previously approved PPA is a requirement to exit Stage 3.

There are approximately 10 Impacted Projects in the Connection Process without a filed or approved PPA for which the AESO anticipates filing a NID or considering under ANAP prior to March 1, 2024. Under the complete abeyance option, the AESO would not file NID applications, issue ANAP approvals, or direct TFOs to file facility applications for these projects.

The AESO anticipates these projects would be impacted as follows:

- The in-service date ("ISD") of the connection facilities may be delayed resulting in the potential for rework or restudy requirements with respect to cost estimates and engineering studies;
- The AESO participant involvement program may become outdated, requiring renotification; and



## BTF Projects

Even under the Approval Hold option, BTF projects would not be able to exit Stage 3/4 of the BTF process because PP Approval is required to enter Stage 5. However, the temporal impacts on stage durations and project ISDs may be reduced if PP Approvals are issued sooner at the end of the pause period, compared to the complete or partial abeyance options, as the Commission would continue to fully process applications during the pause period.

## CONCLUSION

After reviewing the impacts of the pause options on the AESO Connection Process the AESO has concluded that the Approval Hold option is the least impactful of the three options proposed by the Commission. In addition, the Approval Hold option would enable market participants to continue to advance projects within the Connection Process, should they choose to do so. The AESO is committed to providing all market participants with a reasonable opportunity to obtain system access service and looks forward to engaging with interested parties in the Inquiry, while continuing to assist market participants to efficiently move through the Connection Process.

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## Background

On August 3, 2023, the Commission announced it would hold an inquiry into the following issues:

- Considerations on development of power plants on specific types or classes of agricultural or environmental land.
- Considerations of the impact of power plant development on Alberta's pristine viewscapes.
- Considerations of implementing mandatory reclamation security requirements for power plants.
- Considerations for development of power plants on lands held by the Crown in Right of Alberta.
- Considerations of the impact the increasing growth of renewables has on both generation supply mix and electricity system reliability.

The Commission sought stakeholder feedback on three options for how it would implement a pause on approvals on renewable generation projects, including:

**Complete abeyance:** The AUC does not accept new applications during the pause period and all existing excluded applications will be placed in abeyance during the pause period with the AUC taking no further steps to complete their record or issue decisions;

**Partial abeyance:** The AUC does not accept new applications during the pause period. For all existing applications with an incomplete record, the AUC process will proceed to the point where the written evidence is complete, applications will then be placed in abeyance until the pause period expires. The AUC will not hold any public hearings

for these applications during the pause period. Existing applications with a complete record will be placed in abeyance until the pause period expires.

**Approval hold only:** The AUC continues to fully process new and existing excluded applications without issuing any approvals until after the pause period.

Of the three options presented by the Commission in its August 3 letter, TransAlta submits that the Commission should carry out a modified approval hold, for the reasons set out below.

## **Statutory Considerations**

Commission decisions regularly give effect to land use planning documents, visual impacts and reclamation considerations. The Commission's recent decision regarding Foothills Solar in Decision 27486-D01-2023 shows that the Commission has consistently included land use considerations in its decision making process since at least 2001:

The Commission and its predecessors have consistently held that it must have regard for a municipality's land use authority and planning instruments when deciding if approval of a project is in the public interest. In Decision 2001-101, the Alberta Energy and Utilities Board found that land use planning instruments are "relevant to the Board's consideration because they indicate from the municipality's perspective, the nature of the past, present, and future uses of a proposed site or lands in close proximity to a site." More recently, in Decision 24266-D01-2020, the Commission stated "[t]he Commission considers that a municipality's land use authority and the land use regime established under its bylaws form part of its overall determination of whether approval of a project is in the public interest."

The Commission also regularly considers and addresses environmental impacts regarding reclamation plans for solar and wind farms, including compliance with the existing *Conservation and Reclamation Regulation*, and the *Conservation and Reclamation Directive* administered by Alberta Environment and Protected Areas.<sup>1</sup> This is fundamentally no different from reclamation plans for all other types of generation in Alberta. Such reclamation obligations exist pursuant to approvals or directives issued under the *Environmental Protection and Enhancement Act*.<sup>2</sup> In this respect, reference to the *Hydro and Electric Energy Act* is instructive – the Commission does not issue approvals for the discontinuance of operation for power plants except in the case of isolated generating units.<sup>3</sup>

Given the Commission's jurisdiction and ability to implement changes or clarify policy in its own decisions, TransAlta submits that the Commission's approval hold can be

narrowed to avoid the adverse consequences that the hold may have on the economic, orderly and efficient development of generation in Alberta.

In so doing, and to the extent that the Commission is considering making changes to Rule 007, other Commission rules, or recommending statutory changes arising from the inquiry, TransAlta requests that Commission decisions on current applications subject to the hold be adjudicated under the statutory and regulatory regime such as they existed on the date the Commission issued the notice of hearing for such applications.

This comports with the presumption against retroactive or retrospective application of legislative enactments and follows well-established practice.<sup>4</sup> As a notable example, the transitional provisions of the *Alberta Utilities Commission Act* which came into force upon the dissolution of the Alberta Energy and Utilities Board into the Energy Resources Conservation Board and the Commission. Section 80(3) of the *Alberta Utilities Commission Act*, prior to its repeal in 2019, read as follows:

**80(3)** Any proceeding of the Board for which a notice of hearing has been issued and which has not been completed before the coming into force of this section shall be completed by the Board as if the *Alberta Energy and Utilities Board Act* had not been repealed.

TransAlta submits the same treatment ought to apply here to provide investor certainty, promote regulatory efficiency, and comply with the statutory scheme in place.

### **Considerations of Regulatory Efficiency**

A complete abeyance, or even partial abeyance, would occasion processing delays not simply from the approval hold itself, but would create several backlogs of regulatory applications once the approval hold is lifted, including successive waves of applications for needs identification documents, connection orders, and transmission facility applications.

TransAlta further requests that, given environmental and land use planning lens of the inquiry, the scope of the applications subject to the approval hold should be narrowed to exclude renewable and pumped energy storage projects located on brownfield sites - that is to say, lands previously disturbed by industrial development.

These projects do not disturb productive agricultural lands, and do not introduce any incremental or cumulative effects on visual or other environmental impacts. TransAlta submits that the approval hold should mitigate impacts to the level playing field for all generation supply technologies and minimize the disruptions to renewable development by permitting renewables that encourage responsible economic



development, are supported by municipalities and landowners, and are otherwise not directly the subject of the inquiry.

Yours truly,

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Acciona Energía is one of the world's largest operators of renewable energy with 30 years' global experience in this sector and has been operating in Canada since 2002. Acciona Energía already owns and operates four wind farms in Canada, totalling more than 180MW of wind capacity. The company also recently announced the acquisition from Renewable Energy Systems Canada, Inc. and start of construction of Forty Mile, a 280MW wind project in the County of Forty Mile No. 8, which will create up to 250 jobs during the peak construction phase and up to 25 permanent jobs once operational.

Acciona appreciates the opportunity to provide feedback on the implementation of the approval pause, as requested in the Alberta Utilities Commission (AUC) Announcement of August 3, 2023. As a member of the Canadian Renewable Energy Association (CanREA), we share the concerns expressed by CanREA and support their comments relating to Implementation of Approval Pause, Expedited Timeline for Completion of the Inquiry Report and the Grandfathering Approach for New and Existing Applications. However, we wish to take this opportunity to underline our position and to comment on related processes that interact with the pause.

### **Implementation of the Approvals Pause**

Acciona recommends that the AUC implement the "approval hold only" option articulated in the August 3 Announcement. The AUC should continue to accept and fully process all new and existing applications during the pause. Moreover, the AUC should immediately confirm that project applications will be approved based on all applicable rules and requirements in place at the time of application.

### **Grandfathering Approach for Applications**

Acciona has a long history of experience with developing wind energy in Alberta and has observed and complied with evolving regulatory requirements over that time. Continuous improvement in regulations are a normal and expected part of changing dynamics in any industry and Acciona has experience with these evolutions in Alberta and across dozens of other jurisdictions.

However, none of these frequent regulatory reforms have involved a moratorium against project approvals, nor have they raised the risk that projects with complete applications could encounter new, unanticipated regulatory requirements. Regulatory changes that impact, for instance, the optimal design of projects or the contractual relationships with landowners, could – if applied to projects with complete applications – seriously undermine the regulatory signals and investor certainty that underpins Alberta’s electricity market, as well as the relationships with participating landowners and their host communities.

With that in mind, it is critical that the AUC make clear at the start of the Inquiry that recommended reforms will grandfather all applications completed prior to the release of the report, in keeping with prior Rule 007 changes.

### **Expedited Inquiry Completion**

To align with the government’s objective of achieving policy certainty through a time-limited approvals pause, the AUC should commit to a December 31, 2023, deadline for completing and publishing the Inquiry report. This will allow the necessary time for the government to receive and assess recommendations and provide policy clarity in advance of the February 29 pause expiry. Later delivery of the Inquiry report will not enable the government to achieve its stated preference of a shorter pause period.

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TC Energy Corporation (TC Energy) appreciates the opportunity to provide feedback to the Alberta Utilities Commission (AUC) in response to its August 3, 2023, announcement that it will be assessing options to handle applications impacted by the Government of Alberta's (GOA) announced six-month pause on the approvals of power plants and hydro developments producing renewable electricity greater than one megawatt.

TC Energy is an active participant in the Alberta electricity market. Further, it has operated generation facilities and been a marketer of wholesale electricity, including renewable electricity, in Alberta for over two decades. We are currently constructing the [Saddlebrook Solar and Storage Project](#), which upon completion will generate 81 MW of solar generation paired with a utility-scale energy storage facility, with capacity up to 6.5 MW, 40-megawatt-hour. We are also currently progressing the [Canyon Creek Pumped Storage](#) project, located near Hinton, Alberta, which will utilize the existing site infrastructure from a decommissioned coal mine and is expected to have a generating capacity of 75 MW. In addition, and in support of our customers, we are continuously exploring and advancing opportunities to expand our renewable electricity portfolio in Alberta. As such, TC Energy has a significant interest in how regulatory approvals for electricity generation projects are managed within the province.

As the AUC manages in-flight and pending applications during the approval pause, TC Energy recommends the AUC pursue an approval hold only and continue to fully process new and existing excluded applications without issuing any approvals until after the pause period. Of the three options posed, approval hold only is most effective at minimizing the business impacts associated with the pause.

TC Energy encourages the AUC to deliver their Inquiry Report by December 31, 2023, to ensure an implementation plan can be advanced so that applications can begin proceeding again at the end of the Pause established by the Government of Alberta, scheduled for February 29, 2024. Doing so will ensure fairness for existing excluded applications by ensuring that all projects will be adjudicated according to the same standards.

TC Energy appreciates the opportunity to provide comments to the AUC on how best to manage this period of uncertainty. We look forward to the opportunity for continued engagement with the Commission on this initiative.

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Evolugen writes in response to the AUC's request dated August 3, 2023, seeking stakeholder feedback on implementing the approval pause for new renewable electricity generation (the moratorium). Evolgen is an affiliate of and the operating platform for Brookfield Renewable in Canada, one of the world's largest investors in renewable power and climate transition assets, with approximately 24,000 megawatts of generating capacity. In Canada, we own and operate over 60 renewable power facilities generating over 1,900 megawatts of installed capacity, including operations in Alberta. We welcome the opportunity to provide comments on the moratorium and inquiry.

Evolugen has no preference among the three proposed options to implement the approval pause between the complete abeyance, partial abeyance or approval hold only. However, Evolgen has opted to put its own application which was in-progress into abeyance during this moratorium until there is certainty on the AUC rules and process going forward.

Our view on the moratorium is that it creates investment uncertainty for the renewables sector, halting advancement of projects. While there is always a degree of uncertainty involved with the development of projects, including timelines and cost for permitting and construction, the moratorium creates significant uncertainty with respect to the AUC rules and process going forward as well as the timing to implement any changes. Further, if there are substantial changes to the AUC rules and process which create outcomes that are

disadvantageous to the renewables sector, project progression may not only be delayed but projects may be abandoned completely.

It will be beneficial for all stakeholders that the AUC's inquiry be well-structured and implemented to bring quick and definitive policy resolution to ensure Alberta remains a competitive destination for renewables investment. While the moratorium is anticipated to last for a six-month period until February 29, 2024, with a report to the Minister of Affordability and Utilities by March 29, 2024, it remains unknown at this time what government direction will follow, including the form of such direction and how long it may take to implement.

Developers will require time and capital to internalize and operationalize any new direction, including potentially conducting new studies, facilitating new stakeholder consultations and preparing new applications per any additional AUC guidelines. These activities can require several months to restart work and apply should no changes to Rule 007 occur. Therefore, in order to avoid an extended lag in progress beyond the expected 7-month pause from the moratorium and report, it will be imperative that the process and outcomes of the inquiry be designed to provide clarity and avoid ambiguity. Further, guidance on the treatment of projects during the inquiry period, such as grandfathering the current Rule 007 approach for any applications filed prior to the release of the inquiry report, would also provide direction for existing projects. Opportunities for active involvement and meaningful input from all stakeholders in the inquiry process will demonstrate transparency, fairness and open communication and ultimately regain confidence in the Alberta market. We anticipate that clear guidance on inquiry topics will be provided so that developers can incorporate as required and project applications can proceed on a timely basis.

A speedy and definitive resolution of the moratorium will restore investment certainty – providing clarity and reducing ambiguity - ultimately creating a competitive investment environment that will help ensure benefits for all Albertans. Evolgen looks forward to participating in an open and transparent process to implement improvements and continuing to invest in Alberta.

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Aura wishes to express its view regarding the recent Generation Approvals Pause Regulation.

Aura's position is that the only path forward is for proponents to have their applications processed through to completion, including a hearing if necessary, unless and until a proponent asks for a suspension of the proceeding based on their specific circumstances.

Therefore, in response to the Commission's August 3<sup>rd</sup>, 2023, open letter requesting stakeholder feedback, Aura sees the "**Approval hold only**" as the only viable option.

If you have any questions please contact me by email or at the number below.

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My name is XXXXXXXXX and I am a stakeholder in the Northern Valley where a wind project is being proposed. I would like to make known, as a stakeholder, that it is necessary that a "complete abeyance" be enacted in order to properly review the entire regulatory application process. My legal representation, Willms & Shier, has explained our rationale, which I have attached to this email.

As future owner of my family's farm in the Northern Valley area I want to be informed about any and all negatives to living near the windmills. I want to make sure my health as well as the health of my future livestock isn't affected by the windmills. I'm also an avid hunter and I rely on the wildlife that currently live on or near our family farm to feed both myself and my family. I want to be assured that the windmills will not cause these animals to leave because we rely on them for food.

I don't believe it is right for this project to continue without the people in the affected area knowing about all the pros and cons of living near the windmills. The company in charge of the project has refused to answer any questions in regards to these matters. To make matters worse this project is going to be located in a wildlife sensitive area. In my opinion this raises a lot of red flags that must be addressed. A project like this must have the backing of all the people located in the project area. To have this project pushed down our throats for the benefit of those few who will receive compensation is not right. Everyone deserves to have a voice in matters like this.

Thank you for taking the time to read my email.

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# AUC

Alberta Utilities Commission

**Re: Six-Month Approvals Pause Feedback - Northern Valley Families Support a Complete Abeyance of Approvals for New Renewable Electricity Generation**

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Willms & Shier Environmental Lawyers LLP is environmental legal counsel to approximately 50 families in Northern Valley, Alberta. Our clients reside immediately adjacent to the Northern Valley Wind Project currently proposed by Elemental Energy.

We understand that the Alberta Utilities Commission (the “AUC”) is seeking stakeholder feedback about its implementation of a six-month moratorium on approvals for new renewable electricity generation.

For the reasons outlined below, our clients respectfully submit that a six-month complete abeyance of approvals is appropriate during which time the AUC:

- 1 does not accept new applications,
- 2 places all existing excluded applications on hold, and
- 3 takes no further steps to complete their record or issue decisions.

**COMPLETE ABEYANCE OF APPROVALS NECESSARY FOR PROCESS RE-EVALUATION**

Our clients strongly support a review of the entire AUC approvals process. This includes addressing issues spanning from the signing of lease options before public consultation, to the lack of input from communities on Alberta Environment and Protected Area environmental reports, through to the AUC’s mandate and its applicable test for granting approvals.

Given the ongoing re-evaluation of the entire AUC process, our clients' view is that a complete abeyance of approvals during the six-month moratorium is the most appropriate course of action.

The alternate options being considered by the AUC, including a partial abeyance or a hold on issuing approvals until after the moratorium, are not consistent with the purpose of the AUC process review. Under these options, if the public inquiry leads to changes in the AUC approvals process, existing applications would likely have to be resubmitted and reviewed again at significant time and financial expense to all parties involved. Similarly, existing projects in the pre-AUC application phase may be preparing materials based on a set of requirements that may change.

### **COMPLETE ABEYANCE REQUIRED FOR PROCEDURAL FAIRNESS**

Taking any approach other than a complete abeyance during the review process would, in our view, also breach the principles of procedural fairness and legitimate expectation.

The Supreme Court of Canada in *Baker v Canada (Minister of Citizenship & Immigration)* set out guiding principles as follows:<sup>1</sup>

... if a legitimate expectation is found to exist, this will affect the content of the duty of fairness owed to the individual or individuals affected by the decision. If the claimant has a legitimate expectation that a certain procedure will be followed, this procedure will be required by the duty of fairness: . . . . Nevertheless, the doctrine of legitimate expectations cannot lead to substantive rights outside the procedural domain. This doctrine, as applied in Canada, is based on the principle that the "circumstances" affecting procedural fairness take into account the promises or regular practices of administrative decision-makers, and that it will generally be unfair for them to act in contravention of representations as to procedure, or to backtrack on substantive promises without according significant procedural rights. [Emphasis added, portions of the quoted paragraph and citations omitted.]

*Schwarz Hospitality Group Ltd. v. Canada (Minister of Canadian Heritage)*<sup>2</sup> followed *Baker* and presents a cautionary take for administrative decision-makers in the midst of a moratorium.

In *Schwarz*, the Minister of Canadian Heritage imposed a one-year development moratorium for certain types of development in Banff National Park for the purpose of reviewing the guidelines applicable in the circumstances. Notwithstanding the moratorium, Officials at Parks Canada continued to consult with a developer about an existing development proposal.

This ongoing consultation – akin to the partial abeyance options being considered by the AUC – resulted in the developer successfully bringing a *mandamus* order against Parks Canada requiring Parks Canada to adjudicate on the developer's proposal in accordance with the original approval process and guidelines in place before the moratorium was implemented.

This outcome was entirely antithetical to the purpose of the moratorium.

### **CONCLUSION**

Our clients respectfully submit that a complete abeyance moratorium, rather than a partial one, is the best course of action to both:

- 1 permit all stakeholders and the AUC to start afresh under any revised AUC procedures, and
- 2 maintain consistency within the AUC's existing duty of procedural fairness.

Yours truly,

**To whom it may concern,**

After considering the options presented by the AUC for stakeholder consideration, Carbon Assessors must respectfully assert that none of these proposals meet the necessary criteria for a sustainable and prosperous energy sector. We are deeply concerned that the current pause on project approvals stands to inflict lasting and severe damage on our industry. A pause of six months, as proposed, has the potential to translate into substantial economic losses for Alberta, potentially amounting to billions of dollars. Beyond the immediate financial impact, we foresee a significant risk of talent migration away from our province, a missed window for future investment opportunities, and a jeopardization of Alberta's position as a global leader in the renewable energy landscape.

**RECOMMENDATION**

Therefore, it is recommended that the Ministry of Affordability and Utilities rescind Order in Council 171 & 172 and instead establish a joint industry and government committee to co-develop new policies and procedures. This will ensure the continuity of Renewable Energy investment into rural communities.

**BACKGROUND**

The Ministry for Affordability and Utilities made the decision on August 3, 2023, to halt the growth of the Renewable Energy development industry for a period of at least seven months. The Ministry has mandated that the Alberta Utilities Commission ("AUC") stop approving new projects. The stated written purpose for the temporary closure of this industry was to work on policies and procedures. This suggests that the AUC is unable to continue with regular operations while developing new policies i.e. reviewing the numerous sections included in new renewable energy power plant applications.

However, it is not reasonable to shut in a multi-billion-dollar industry for the purposes of developing policies and procedures. This could cause a decrease of investment into rural municipalities ranging from ~\$3B CAD (for the 15 projects immediately waiting approval) up to ~\$25B CAD as cited by the Pembina Institute (for the 91 projects currently in earlier stages of development).

**SOLUTION**

Industry must be allowed to step in and assist the public sector with the workload involved with developing new policies to keep up with the fast-growing Renewable Energy industry. More specifically, a joint industry and government committee should be established to streamline red tape and mitigate future issues and concerns through proactive decisions. Funds from the Technology Innovation Emission Reductions Regulation fund can be allocated to support the committee. A more detailed charter and budget should be developed with input from highly impacted stakeholders. Administration of this committee will work in lockstep to support AESO and AUC. The committee will engage consultants to execute the work involved with updating policies and procedures to manage the responsible growth of the industry. In exchange, industry will continue to operate with current projects grandfathered as new regulations are implemented.

In tandem with this recommendation, Carbon Assessors will be submitting a more comprehensive proposal with industry signatories in the coming days.

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UC Members,

I am writing as a concerned Albertan resident in response to your stakeholder feedback request, dated August 3, 2023. I respectfully request that the AUC end the pause and immediately recommence approvals for renewable energy projects greater than 1MW. I believe the decision to pause renewable projects of greater than 1MW is unnecessary, will threaten thousands of jobs, will increase electricity



costs for all ratepayers, will stifle billions of dollars in investment, and will slow efforts to address climate change. Alberta is the solar powerhouse of Canada, and we need to maintain our competitive edge.

I understand that you have a number of concerns you are seeking to address:

- With respect to land reclamation concerns, please note that solar sites will remain viable well past the end of life of the original panels, and this will significantly reduce land reclamation needs. Additionally, The Government of Alberta already has reclamation Guidelines for Renewable Energy Operations which address this matter.
- With respect to end-of-life concerns for renewable energy infrastructure disposal, the Alberta Recycling Management Authority (ARMA) is already piloting reuse and recycle programs for solar PV. Given that the majority of solar being installed today will be in operation for well over 25 years, ARMA is really out ahead on this matter.
- With respect to land use concerns, such as food security, wetland preservation and wildlife conservation, Solar Alberta has already created highly relevant Solar Siting Recommendations: <https://solaralberta.ca/solar-siting-recommendations/>. I believe you could review and adopt protocols such as these without a pause on approvals.

If the Government of Alberta and the AUC are unwilling to immediately end the pause, I respectfully request that you continue to fully process new and existing excluded applications without issuing any approvals until after the pause period (Option 3 in your announcement).

Thank you for considering my request.

Sincerely,

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Dear AUC Members,

I am writing as a concerned Alberta resident in response to your request for feedback request, dated August 3, 2023. I request that the AUC end the pause and restart accepting and processing approvals for renewable energy projects greater than 1MW. The decision to pause renewable projects of greater than 1MW is, in my opinion, unwarranted and puts thousands of jobs and billions of dollars of investment at risk, while simultaneously slowing efforts to address climate change.

I believe the legitimate concerns expressed can be addressed in parallel with the industry development:

- 1) land reclamation concerns: solar sites remain viable well past the end of life of the original panels, the Government of Alberta already has reclamation Guidelines for Renewable Energy Operations.
- 2) end of life concerns: the Alberta Recycling Management Authority (ARMA) is already piloting reuse and recycle programs for solar PV. Given that the majority of solar being installed today will be in operation for well over 25 years there is plenty of time to ensure solutions are in place
- 3) With respect to land use concerns, such as food security, wetland preservation and wildlife conservation, solar and wind development only impacts a small percentage of arable land and solutions which combine solar and agriculture are being developed and could be encouraged.



# AUC

Alberta Utilities Commission

Solar Alberta has created Solar Siting Recommendations which could be adopted as a start and modified as required without a pause on approvals.

If the Government of Alberta and the AUC are unwilling to immediately end the pause, I respectfully request that you continue to fully process new and existing excluded applications without issuing any approvals until after the pause period (Option 3 in your announcement).

Thank you for considering my request.

Sincerely,

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DEAR AUC MEMBERS,

I am writing as a concerned Albertan resident in response to your stakeholder feedback request, dated August 3, 2023<sup>1</sup>. **I respectfully request that the AUC end the pause and immediately recommence approvals for renewable energy projects greater than 1MW.** I believe the decision to pause renewable projects of greater than 1MW<sup>2</sup> is unnecessary, will threaten thousands of jobs, will increase electricity costs for all ratepayers, will stifle billions of dollars in investment, and will slow efforts to address climate change. Alberta is the solar powerhouse of Canada, and we need to maintain our competitive edge.

I understand that you have a number of concerns you are seeking to address<sup>3</sup>:

- With respect to **land reclamation** concerns, please note that solar sites will remain viable well past the end of life of the original panels, and this will significantly reduce land reclamation needs. Additionally, The Government of Alberta already has reclamation [Guidelines for Renewable Energy Operations](#) which address this matter.
- With respect to **end of life** concerns for renewable energy infrastructure disposal, the Alberta Recycling Management Authority (ARMA) is already piloting reuse and recycle programs for solar PV. Given that the majority of solar being installed today will be in operation for well over 25 years, ARMA is really out ahead on this matter.
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If the Government of Alberta and the AUC are unwilling to immediately end the pause, I respectfully request that you continue to fully process new and existing excluded applications without issuing any approvals until after the pause period (Option 3 in your announcement).

Thank you for considering my request.

Sincerely,

Dear AUC Members,

I am writing as a concerned Albertan resident in response to your stakeholder feedback request, dated August 3, 2023<sup>1</sup>. **I respectfully request that the AUC end the pause and immediately recommence approvals for renewable energy projects greater than 1MW.** I believe the decision to pause renewable projects of greater than 1MW<sup>2</sup> is unnecessary, will threaten thousands of jobs, will increase electricity costs for all ratepayers, will stifle billions of dollars in investment, and will slow efforts to address climate change. Alberta is the solar powerhouse of Canada, and we need to maintain our competitive edge.

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If the Government of Alberta and the AUC are unwilling to immediately end the pause, I respectfully request that you continue to fully process new and existing excluded applications without issuing any approvals until after the pause period (Option 3 in your announcement).

Thank you for considering my request.

Sincerely,

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Dear AUC Members,

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If the Government of Alberta and the AUC are unwilling to immediately end the pause, I respectfully request that you continue to fully process new and existing excluded applications without issuing any approvals until after the pause period (Option 3 in your announcement).

Thank you for considering my request.

Sincerely,

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Dear Premier Smith and members of the Alberta Utilities Commission,

As I watch people fleeing for their lives from Kelowna and Yellowknife, I urge you to end the pause on renewable energy projects right now. We need clean energy more than ever. If you should be pausing anything, it is fossil fuel projects and subsidies.

I am really angry that Premier Smith has called for this pause, especially when our fossil fuel industry is not being held to the same standards when it comes to end of life, land use, and reclamation concerns. I have seen with my own eyes the huge solar farm on poor soils/alkali flats near Claresholm AB. I believe that our renewable energy community has the welfare of the planet in mind, unlike the fossil fuel industry that is padding the pockets of the wealthy in spite of evidence that emissions are causing climate change and killing too many of our planet's ecosystems.

I want my children and grandchildren to be able to breathe clear air. With AQHI reaching 10 or worse, that's not possible. Have you even noticed that Alberta's blue skies aren't as blue as they used to be? Pausing renewable projects is dooming us all to have to rely mainly on the fossil fuels that are changing our climate so quickly. If we haven't already reached the tipping point, we are most certainly running out of time.

End the pause on renewable energy projects now.

Sincerely,

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Dear AUC Members,

I am writing as a concerned Albertan resident in response to your stakeholder feedback request, dated August 3, 2023<sup>1</sup>. **I respectfully request that the AUC end the pause and immediately**



**recommence approvals for renewable energy projects greater than 1MW.** I believe the decision to pause renewable projects of greater than 1MW<sup>2</sup> is unnecessary, will threaten thousands of jobs, will increase electricity costs for all ratepayers, will stifle billions of dollars in investment, and will slow efforts to address climate change. Alberta is the solar powerhouse of Canada, and we need to maintain our competitive edge.

I understand that you have a number of concerns you are seeking to address<sup>3</sup>:

- With respect to **land reclamation** concerns, please note that solar sites will remain viable well past the end of life of the original panels, and this will significantly reduce land reclamation needs. Additionally, The Government of Alberta already has reclamation [Guidelines for Renewable Energy Operations](#) which address this matter.
- With respect to **end of life** concerns for renewable energy infrastructure disposal, the Alberta Recycling Management Authority (ARMA) is already piloting reuse and recycle programs for solar PV. Given that the majority of solar being installed today will be in operation for well over 25 years, ARMA is really out ahead on this matter.
- With respect to **land use** concerns, such as food security, wetland preservation and wildlife conservation, Solar Alberta has already created highly relevant Solar Siting Recommendations: <https://solaralberta.ca/solar-siting-recommendations/>. I believe you could review and adopt protocols such as these without a pause on approvals.

If the Government of Alberta and the AUC are unwilling to immediately end the pause, I respectfully request that you continue to fully process new and existing excluded applications without issuing any approvals until after the pause period (Option 3 in your announcement). Thank you for considering my request.

Sincerely,

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Dear AUC Members,

I am writing as a concerned Albertan resident in response to your stakeholder feedback request, dated August 3, 2023<sup>1</sup>. **I respectfully request that the AUC end the pause and immediately recommence approvals for renewable energy projects greater than 1MW.** I believe the decision to pause renewable projects of greater than 1MW<sup>2</sup> is unnecessary, will threaten thousands of jobs, will increase electricity costs for all ratepayers, will stifle billions of dollars in investment, and will slow efforts to address climate change. Alberta is the solar powerhouse of Canada, and we need to maintain our competitive edge.

I understand that you have a number of concerns you are seeking to address<sup>3</sup>:

- With respect to **land reclamation** concerns, please note that solar sites will remain viable well past the end of life of the original panels, and this will significantly reduce land reclamation needs. Additionally, The Government of Alberta already has reclamation [Guidelines for Renewable Energy Operations](#) which address this matter.



# AUC

Alberta Utilities Commission

- With respect to **end of life** concerns for renewable energy infrastructure disposal, the Alberta Recycling Management Authority (ARMA) is already piloting reuse and recycle programs for solar PV. Given that the majority of solar being installed today will be in operation for well over 25 years, ARMA is really out ahead on this matter.
- With respect to **land use** concerns, such as food security, wetland preservation and wildlife conservation, Solar Alberta has already created highly relevant Solar Siting Recommendations: <https://solaralberta.ca/solar-siting-recommendations/>. I believe you could review and adopt protocols such as these without a pause on approvals.

If the Government of Alberta and the AUC are unwilling to immediately end the pause, I respectfully request that you continue to fully process new and existing excluded applications without issuing any approvals until after the pause period (Option 3 in your announcement).

Thank you for considering my request.

---

Dear AUC Members,

I am an Alberta senior who is very concerned about the pause on renewable energy projects greater than 1MW. I am responding to your request for stakeholder feedback request, dated Aug 3/23. Please end the pause. I am concerned about the harm to Alberta's reputation as a safe and secure place for investment. As well as rising electricity costs for all Albertans and potentially thousands of jobs lost. We are watching northern, Alberta & BC burn with thousands of people evacuated and 2/3 of the NWT's evacuated. I'm deeply concerned about how climate change will affect future generations and what we do now matters.

I share concerns about the impact on agricultural land, land reclamation and end of life issues for disposal of waste from no longer viable renewable energy projects. However, I believe that we have the framework, regulations and recommended protocols in place to address these concerns without pausing projects. I think it is always a good idea to review existing frameworks, regulations and protocol to take into consideration new scientific evidence and public concerns. The Government of Alberta has Guidelines for Renewable Energy Operations and ARMA is already piloting reuse and recycle programs for solar PV. Solar Alberta has created Solar Siting recommendations. It seems to me that this provides enough guidance for the Government of Alberta and the AUC to review and make any needed changes and in a timely fashion without pausing projects.

The world is watching us, media from all over has been reporting on this and this decision does nothing to enhance the stable and safe business environment that we call the Alberta Advantage. Quite the opposite.

If the Government of Alberta and the AUC will not end the pause please continue to fully process new and exiting excluded applications without issuing approvals until after the pause process (Option 3 in your announcement)

Thank you for this opportunity to provide feedback and considering my request for ending the pause on renewable energy projects.

## Comments on the Implementation of the Generation Approvals Pause Regulation

On August 3, 2023, the Alberta government enacted the *Generation Approvals Pause Regulation* through an order-in-council that will require the AUC to pause approvals of new renewable electricity generation projects over one megawatt effective immediately. In accordance with this regulation, the AUC is prohibited from issuing approvals on existing proceedings until March 1, 2024.

On August 3, 2023, the Commission requested feedback from stakeholders on how the approval pause should be implemented for the following options: complete abeyance, partial abeyance, and approval hold only.

The following are my suggestions on how the approval pause should be implemented.

AUC's Options	My comments
<p><b>Complete abeyance:</b> The AUC does not accept new applications during the pause period and all existing excluded applications will be placed in abeyance during the pause period with the AUC taking no further steps to complete their record or issue decisions.</p>	<p>I agree with the AUC regarding not accepting any new applications during the pause period. Further clarity is required before applicants can submit further applications. I would like to be included in the inquiry as I have a lot to say regarding the reclamation aspects of solar projects and the use of prime agricultural lands for solar projects. In my opinion, solar projects should not be sited on prime agricultural lands.</p> <p>I also agree that all existing excluded applications should be placed in abeyance during the pause period as this will ensure that those applications are updated to address the requirements that will arise from the inquiry. It does not make sense to continue with the existing excluded applications when some applications may not proceed further depending on the outcome of the inquiry or where some applications will require extensive amendments to continue to proceed.</p> <p>By not proceeding further with all existing excluded applications, additional costs are</p>

	<p>not incurred by landowners and applicants.</p> <p>A disadvantage of not allowing any further procedural steps until the lifting of the pause is the congestion that may arise when the gate is opened. I believe that the Commission can deal with this congestion by spacing out the procedural steps so as to give parties sufficient time to prepare materials and complete the steps. Further, the congestion may be small considering that some applicants may consider it no longer viable to continue with their applications considering the new requirements.</p> <p>In conclusion, I vote for this option.</p>
<p><b>Partial abeyance:</b> The AUC does not accept new applications during the pause period. For all existing applications with an incomplete record, the AUC process will proceed to the point where the written evidence is complete, applications will then be placed in abeyance until the pause period expires. The AUC will not hold any public hearings for these applications during the pause period. Existing applications with a complete record will be placed in abeyance until the pause period expires.</p>	<p>While this option ensures that the proceedings advance during the pause period, it is unfair to parties because the Commission will be considering and applying the “new requirements” to the applications without having given the parties especially interveners an opportunity to provide evidence on the interpretation of the new requirements. Unless the Commission intends to set further process steps after the completion of the record to deal with the new requirements, my suggestion is to not proceed with partial abeyance.</p> <p>Conclusion: if the Commission wants to proceed with this option, a variation should be added that will allow further process steps to be established, if needed, after the pause period.</p>
<p><b>Approval hold only:</b> The AUC continues to fully process new and existing excluded applications without issuing any approvals until after the pause period.</p>	<p>See my comments on partial abeyance, which apply here.</p>

<p><b>Other Options</b></p>	<p>I suggest that an option be developed to deal with costs for the existing excluded applications. I suggest that interveners be allowed to file interim costs for the process steps undertaken up to the time of abeyance. The interim costs will ensure that interveners' counsel and experts receive some remuneration during the pause period. As applicants are liable in costs regardless of whether their applications are cancelled or pulled, this option does not cause any hardship on applicants and will help in reducing their overall cost burden at the conclusion of their applications.</p>
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Thank you for the opportunity to provide this comment to the Commission.

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Dear AUC Members,

I am writing as a concerned Albertan resident in response to your stakeholder feedback request, dated August 3, 2023<sup>1</sup>. **I respectfully request that the AUC end the pause and immediately recommence approvals for renewable energy projects greater than 1MW.** I believe the decision to pause renewable projects of greater than 1MW<sup>2</sup> is unnecessary, will threaten thousands of jobs, will increase electricity costs for all ratepayers, will stifle billions of dollars in investment, and will slow efforts to address climate change. Alberta is the solar powerhouse of Canada, and we need to maintain our competitive edge.

I understand that you have a number of concerns you are seeking to address<sup>3</sup>:

- With respect to **land reclamation** concerns, please note that solar sites will remain viable well past the end of life of the original panels, and this will significantly reduce land reclamation needs. Additionally, The Government of Alberta already has reclamation [Guidelines for Renewable Energy Operations](#) which address this matter.
- With respect to **end of life** concerns for renewable energy infrastructure disposal, the Alberta Recycling Management Authority (ARMA) is already piloting reuse and recycle programs for solar PV. Given that the majority of solar being installed today will be in operation for well over 25 years, ARMA is really out ahead on this matter.
- With respect to **land use** concerns, such as food security, wetland preservation and wildlife conservation, Solar Alberta has already created highly relevant Solar Siting



# AUC

Alberta Utilities Commission

Recommendations: <https://solaralberta.ca/solar-siting-recommendations/>. I believe you could review and adopt protocols such as these without a pause on approvals.

If the Government of Alberta and the AUC are unwilling to immediately end the pause, I respectfully request that you continue to fully process new and existing excluded applications without issuing any approvals until after the pause period (Option 3 in your announcement).

Thank you for considering my request.

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Dear Alberta Utilities Commission (AUC) Members,

We are deeply concerned with the current pause on new renewable energy generation approvals that has been implemented by the AUC. This moratorium puts a chill on investment and directly harms businesses like SkyFire. SkyFire Energy is an employee-owned, Certified B Corporation that has been building grid connected solar projects in Alberta since 2001. This moratorium is unprecedented and completely unnecessary – the concerns at issue here could, without question, be addressed while continuing to allow the solar industry to move forward. With this pause now in place, it is the Commission’s duty to mitigate any additional risk to jobs, the integrity of this market, the development capital invested and this industry’s future.

Unfortunately, this broad sweeping moratorium has put many well-developed and publicly beneficial solar projects on hold and at risk. Examples of projects on hold and at risk include:

- Indigenous owned solar projects developed on Indigenous owned land
- Small (ex. ~5MW) solar projects co-located and interconnected with natural gas generation
- Small (ex. ~5MW) co-operative and community owned solar projects
- Solar projects located on brownfields
- Battery storage projects

We would request that the Commission work with the government to *immediately* lift the pause on distribution connected solar projects which are smaller in scale (typically <30MW), have less impact on agricultural land use, have reduced risk of reclamation liability, have less environmental impacts, have a shorter development and construction timeline and which reduce demand on our transmission system.

If the Government of Alberta and the AUC are unwilling to immediately end the pause, I respectfully request that you continue to fully process new and existing power plant applications without issuing any approvals until after the pause period (Option 3 in your announcement).

Thank you for your consideration.

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Dear AUC Members,



I am writing as a concerned Albertan resident in response to your stakeholder feedback request, dated August 3, 2023<sup>1</sup>. **I respectfully request that the AUC end the pause and immediately recommence approvals for renewable energy projects greater than 1MW.** I believe the decision to pause renewable projects of greater than 1MW<sup>2</sup> is unnecessary, will threaten thousands of jobs, will increase electricity costs for all ratepayers, will stifle billions of dollars in investment, and will slow efforts to address climate change. Alberta is the solar powerhouse of Canada, and we need to maintain our competitive edge.

I understand that you have a number of concerns you are seeking to address<sup>3</sup>:

- With respect to **land reclamation** concerns, please note that solar sites will remain viable well past the end of life of the original panels, and this will significantly reduce land reclamation needs. Additionally, The Government of Alberta already has reclamation [Guidelines for Renewable Energy Operations](#) which address this matter.
- With respect to **end of life** concerns for renewable energy infrastructure disposal, the Alberta Recycling Management Authority (ARMA) is already piloting reuse and recycle programs for solar PV. Given that the majority of solar being installed today will be in operation for well over 25 years, ARMA is really out ahead on this matter.
- With respect to **land use** concerns, such as food security, wetland preservation and wildlife conservation, Solar Alberta has already created highly relevant Solar Siting Recommendations: <https://solaralberta.ca/solar-siting-recommendations/>. I believe you could review and adopt protocols such as these without a pause on approvals.

If the Government of Alberta and the AUC are unwilling to immediately end the pause, I respectfully request that you continue to fully process new and existing excluded applications without issuing any approvals until after the pause period (Option 3 in your announcement).

Thank you for considering my request.

Sincerely,

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Dear AUC Members,

I am writing as a concerned Albertan resident in response to your stakeholder feedback request, dated August 3, 2023(1). I respectfully request that the AUC end the pause and immediately recommence approvals for renewable energy projects greater than 1MW.

I believe the decision to pause renewable projects of greater than 1MW(2) is unnecessary, and will threaten thousands of jobs, increase electricity costs for all ratepayers, stifle billions of dollars in investment, and will slow efforts to address climate change. Alberta is the solar powerhouse of Canada, and we need to maintain our competitive edge.

I understand that you have a number of concerns you are seeking to address(3):

With respect to land reclamation concerns, please note that solar sites will remain viable well past the end of life of the original panels, and this will significantly reduce land reclamation needs. Additionally, The Government of Alberta already has reclamation Guidelines for Renewable Energy Operations (4) which addresses this matter.

With respect to end of life concerns for renewable energy infrastructure disposal, the Alberta Recycling Management Authority (ARMA) is already piloting reuse and recycle programs for solar PV. Given that the majority of solar being installed today will be in operation for well over 25 years, ARMA is really out ahead on this front.

With respect to land use concerns, such as food security, wetland preservation and wildlife conservation, please note that solar plant can be build with the cooperation of farmers ( i.e. Agrivoltaics). Also, there is already a Government of Alberta wildlife directive for Solar Energy projects (5) which addresses the wetland and wildlife matter. I believe you could review and amalgamate all existing documation into one clear directive that would clearly adress all concerns without a pause on approvals.

If the Government of Alberta and the AUC are unwilling to immediately end the pause, I respectfully request that you continue to fully process new and existing excluded applications without issuing any approvals until after the pause period (Option 3 in your announcement).

Thank you for considering my request.

Sincerely,

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Dear AUC Members,

I am writing as a concerned Albertan resident in response to your stakeholder feedback request, dated August 3, 2023<sup>1</sup>. **I respectfully request that the AUC end the pause and immediately recommence approvals for renewable energy projects greater than 1MW.** I believe the decision to pause renewable projects of greater than 1MW<sup>2</sup> is unnecessary, will threaten thousands of jobs, will increase electricity costs for all ratepayers, will stifle billions of dollars in investment, and will slow efforts to address climate change. Alberta is the solar powerhouse of Canada, and we need to maintain our competitive edge.

I understand that you have a number of concerns you are seeking to address<sup>3</sup>:

- With respect to **land reclamation** concerns, please note that solar sites will remain viable well past the end of life of the original panels, and this will significantly reduce land reclamation needs. Additionally, The Government of Alberta already has reclamation [Guidelines for Renewable Energy Operations](#) which address this matter.
- With respect to **end of life** concerns for renewable energy infrastructure disposal, the Alberta Recycling Management Authority (ARMA) is already piloting reuse and recycle





# AUC

Alberta Utilities Commission

programs for solar PV. Given that the majority of solar being installed today will be in operation for well over 25 years, ARMA is really out ahead on this matter.

- With respect to **land use** concerns, such as food security, wetland preservation and wildlife conservation, Solar Alberta has already created highly relevant Solar Siting Recommendations: <https://solaralberta.ca/solar-siting-recommendations/>. I believe you could review and adopt protocols such as these without a pause on approvals.

If the Government of Alberta and the AUC are unwilling to immediately end the pause, I respectfully request that you continue to fully process new and existing excluded applications without issuing any approvals until after the pause period (Option 3 in your announcement).

Thank you for considering my request.

Sincerely,

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Dear AUC Members,

I am a resident of Calgary and I am writing as a concerned Albertan in response to your stakeholder feedback request, dated August 3, 2023. **I respectfully request that the AUC end the pause and immediately recommence approvals for renewable energy projects greater than 1MW.** I believe the decision to pause renewable projects of greater than 1MW<sup>2</sup> is unnecessary, will threaten thousands of jobs, will increase electricity costs for all ratepayers, will stifle billions of dollars in investment, and will slow efforts to address climate change. Alberta is the solar powerhouse of Canada, and we need to maintain our competitive edge.

I understand that you have a number of concerns in regards to land reclamation, infrastructure end of life concerns, and land use concerns. It is also my understanding that there are currently regulations and laws that address these concerns. Furthermore, review of industry regulations can occur while the sector continues to grow. This would be a part of responsible energy development.

Alberta is an Energy province. I urge you to consider the long-term negative impacts that a moratorium would have on our thriving renewable energy industry.

Thank you for considering my request.

Sincerely,

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Green energy pause is silly and thousands of people are losing their jobs that a lot of them have taken extra training to do these green energy jobs.

Alberta was about to become green energy leader and now laughing stock in the world.



I am a retired native Albertan and worked for over 50 years building utilities plants and petroleum plants.

We need as much green energy as possible as quickly as possible, not delayed 6 months for a study. Study while it is being built and then if problems developed fix before next stage.

Undo the pause immediately.

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My name is XXXXXXXXXX and I am a landowner in the Northern Valley where a wind project is being proposed. I would like to make known, as a stakeholder, that it is necessary that a “complete abeyance” be enacted in order to properly review the entire regulatory application process. My legal representation, Willms & Shier, has explained our rationale, which I have attached to this email.

We are not being told about any negative effects these windmills may cause, for example, the effects they will have on human health and the health of our livestock. We also don't know how the windmills will affect the property values of nearby farms/land. A decrease in property values could be detrimental to a family's finances should they decide to sell. We also don't know how the construction of these windmills will affect everyday activities for farmers such as can we still plant and harvest crops during the construction period? If we can't do this then this will affect the livelihoods of farmers nearby. This project is in a wildlife sensitive area and there have been no clear answers on how these windmills will affect the wildlife living here. For example, how will this project affect the endangered whooping cranes? The company in charge of this project has no clear answers to these questions.

This project must not go ahead without the complete support of all the people living in the Northern Valley area and clear answers to our questions.

Thank you for taking the time to read my email.

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**Re: Six-Month Approvals Pause Feedback - Northern Valley Families Support a Complete Abeyance of Approvals for New Renewable Electricity Generation**

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Willms & Shier Environmental Lawyers LLP is environmental legal counsel to approximately 50 families in Northern Valley, Alberta. Our clients reside immediately adjacent to the Northern Valley Wind Project currently proposed by Elemental Energy.

We understand that the Alberta Utilities Commission (the "AUC") is seeking stakeholder feedback about its implementation of a six-month moratorium on approvals for new renewable electricity generation.

For the reasons outlined below, our clients respectfully submit that a six-month complete abeyance of approvals is appropriate during which time the AUC:

- 1 does not accept new applications,
- 2 places all existing excluded applications on hold, and
- 3 takes no further steps to complete their record or issue decisions.

**COMPLETE ABEYANCE OF APPROVALS NECESSARY FOR PROCESS RE-EVALUATION**

Our clients strongly support a review of the entire AUC approvals process. This includes addressing issues spanning from the signing of lease options before public consultation, to the lack of input from communities on Alberta Environment and Protected Area environmental reports, through to the AUC's mandate and its applicable test for granting approvals.

Given the ongoing re-evaluation of the entire AUC process, our clients' view is that a complete abeyance of approvals during the six-month moratorium is the most appropriate course of action.

The alternate options being considered by the AUC, including a partial abeyance or a hold on issuing approvals until after the moratorium, are not consistent with the purpose of the AUC process review. Under these options, if the public inquiry leads to changes in the AUC approvals process, existing applications would likely have to be resubmitted and reviewed again at significant time and financial expense to all parties involved. Similarly, existing projects in the pre-AUC application phase may be preparing materials based on a set of requirements that may change.

### **COMPLETE ABEYANCE REQUIRED FOR PROCEDURAL FAIRNESS**

Taking any approach other than a complete abeyance during the review process would, in our view, also breach the principles of procedural fairness and legitimate expectation.

The Supreme Court of Canada in *Baker v Canada (Minister of Citizenship & Immigration)* set out guiding principles as follows:<sup>1</sup>

... if a legitimate expectation is found to exist, this will affect the content of the duty of fairness owed to the individual or individuals affected by the decision. If the claimant has a legitimate expectation that a certain procedure will be followed, this procedure will be required by the duty of fairness: . . . . Nevertheless, the doctrine of legitimate expectations cannot lead to substantive rights outside the procedural domain. This doctrine, as applied in Canada, is based on the principle that the "circumstances" affecting procedural fairness take into account the promises or regular practices of administrative decision-makers, and that it will generally be unfair for them to act in contravention of representations as to procedure, or to backtrack on substantive promises without according significant procedural rights. [Emphasis added, portions of the quoted paragraph and citations omitted.]

*Schwarz Hospitality Group Ltd. v. Canada (Minister of Canadian Heritage)*<sup>2</sup> followed *Baker* and presents a cautionary take for administrative decision-makers in the midst of a moratorium.

In *Schwarz*, the Minister of Canadian Heritage imposed a one-year development moratorium for certain types of development in Banff National Park for the purpose of reviewing the guidelines applicable in the circumstances. Notwithstanding the moratorium, Officials at Parks Canada continued to consult with a developer about an existing development proposal.

This ongoing consultation – akin to the partial abeyance options being considered by the AUC – resulted in the developer successfully bringing a *mandamus* order against Parks Canada requiring Parks Canada to adjudicate on the developer's proposal in accordance with the original approval process and guidelines in place before the moratorium was implemented.

This outcome was entirely antithetical to the purpose of the moratorium.

### **CONCLUSION**

Our clients respectfully submit that a complete abeyance moratorium, rather than a partial one, is the best course of action to both:

- 1 permit all stakeholders and the AUC to start afresh under any revised AUC procedures, and
- 2 maintain consistency within the AUC's existing duty of procedural fairness.

Yours truly,

Dear AUC Members,

I am writing as a concerned Albertan resident in response to your stakeholder feedback request, dated August 3, 2023<sup>1</sup>. **I respectfully request that the AUC end the pause and immediately recommence approvals for renewable energy projects greater than 1MW.** I believe the decision to pause renewable projects of greater than 1MW<sup>2</sup> is unnecessary, will threaten thousands of jobs, will increase electricity costs for all ratepayers, will stifle billions of dollars in investment, and will slow efforts to address climate change. Alberta is the solar powerhouse of Canada, and we need to maintain our competitive edge.

I understand that you have a number of concerns you are seeking to address<sup>3</sup>:

- With respect to **land reclamation** concerns, please note that solar sites will remain viable well past the end of life of the original panels, and this will significantly reduce land reclamation needs. Additionally, The Government of Alberta already has reclamation [Guidelines for Renewable Energy Operations](#) which address this matter.
- With respect to **end of life** concerns for renewable energy infrastructure disposal, the Alberta Recycling Management Authority (ARMA) is already piloting reuse and recycle programs for solar PV. Given that the majority of solar being installed today will be in operation for well over 25 years, ARMA is really out ahead on this matter.
- With respect to **land use** concerns, such as food security, wetland preservation and wildlife conservation, Solar Alberta has already created highly relevant Solar Siting Recommendations: <https://solaralberta.ca/solar-siting-recommendations/>. I believe you could review and adopt protocols such as these without a pause on approvals.

If the Government of Alberta and the AUC are unwilling to immediately end the pause, I respectfully request that you continue to fully process new and existing excluded applications without issuing any approvals until after the pause period (Option 3 in your announcement).

Thank you for considering my request.

Sincerely,

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Dear AUC Members,

I am writing as a concerned Albertan resident in response to your stakeholder feedback request, dated August 3, 2023<sup>1</sup>. **I respectfully request that the AUC end the pause and immediately recommence approvals for renewable energy projects greater than 1MW.** I believe the decision to pause renewable projects of greater than 1MW<sup>2</sup> is unnecessary, will threaten thousands of jobs, will increase electricity costs for all ratepayers, will stifle billions of dollars in



investment, and will slow efforts to address climate change. Alberta is the solar powerhouse of Canada, and we need to maintain our competitive edge.

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- With respect to **land reclamation** concerns, please note that solar sites will remain viable well past the end of life of the original panels, and this will significantly reduce land reclamation needs. Additionally, The Government of Alberta already has reclamation [Guidelines for Renewable Energy Operations](#) which address this matter.
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If the Government of Alberta and the AUC are unwilling to immediately end the pause, I respectfully request that you continue to fully process new and existing excluded applications without issuing any approvals until after the pause period (Option 3 in your announcement).

Thank you for considering my request.

Sincerely,

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Dear AUC Members,

I am rating as a concerned lifelong Albertan in response to your stakeholders request dated August 3, 2023. I respectfully request that the AUC end the pause and immediately recommend approvals for energy projects greater than one megabyte.

I believe your actions are unnecessarily, threatening thousands of jobs Will increase electricity costs and drive away billions of dollars of investments. We do not need to slow down our efforts to address climate change rather we need to be in the forefront of solar and wind alternative energy projects. We need to maintain our standing as leaders for a better healthier planet ,

In regards to land reclamation concerns, following the guidelines already in place is viable as well as the end of life for original panels as they are in working order for at least 25 years I would also suggest as an option to look into placing solar panels on many of the large and small rooftops of buildings in our province .



The Alberta recycling management authority is already piloting the reuse and recycling programs for Kurt for current panels.

In regards to the land-use concerns, food security, and the wetland preservation. There are already protocols in place. This would eliminate the need to pause on approvals.

If the government of Alberta and the AUC are unwilling to end the pause, I respectfully request that all new and existing applications be processed without approvals, until after the paused period.

I strongly encourage you to think of the future of all Albertans and the impact. This will have on the climate change, and our ability to meet our climate goals.

Thank you for considering my request,

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Greengate Power Corporation is a renewable energy developer who has been successfully and responsibly operating in Alberta for the past 16 years. We appreciate the opportunity to provide feedback on the upcoming Inquiry into the ongoing economic, orderly and efficient development of electricity generation in Alberta.

Greengate believes that this Inquiry can be conducted without any pause in AUC approvals. The Pause introduces unprecedented levels of risk and uncertainty, as well as concerns that the Fair, Efficient and Open Competition (FEOC) principles that the Alberta energy-only market is based upon are being compromised. We are concerned about what the Pause signals to the market and the ability of the Alberta industry to effectively compete for capital within the global landscape. We propose the following recommendations to minimize disruption to the renewable energy industry in Alberta, and to reduce the economic harm to industry participants created by the decision to pause approvals. Any Inquiry outcomes will need to be delivered as expeditiously as possible and provide certainty and predictability.

This letter provides a response to the Commission's request for feedback on the implementation of the approval Pause ("the Pause"), dated August 3, 2023, while offering further suggestions on the approach of the Inquiry, including the following:

- Expedited Timeline for Completion of the Inquiry Report
- Grandfathering Approach for New and Existing Applications
- Phased Approach to Inquiry

### Implementation of Approval Pause

Greengate strongly recommends that the Commission implements only an Approval Hold and continues to fully process all new and existing applications during the Pause period. The AUC will need to confirm that project applications will be approved based on *all applicable* rules and requirements in place at the time of application<sup>1</sup>. This approach will ensure that the Commission is prepared to continue approvals immediately once the Pause is lifted on February 29, 2024.

The AESO is just embarking on a new "Cluster Study" process for connections and Greengate is concerned that a large influx in applications upon its completion will be exacerbated by the Pause. Continuing to process new and existing applications reduces the risk that the AUC will need to simultaneously process two significant bottlenecks of applications in 2024.

## Expedited Timeline for Completion of the Inquiry Report

To ensure fairness and efficiency, the AUC should commit to a December 31, 2023, completion and publication of the Inquiry report. This will create alignment between the Inquiry and the AESO's Cluster Study process, which has committed to issue a Preliminary Assessment Package by December 31, 2023. Project proponents will need to know the outcomes of the Inquiry alongside the study conclusions to decide whether to proceed with their projects.

## Grandfathering Approach for New and Existing Applications

Currently, there is considerable concern regarding the impact of the Inquiry on applications that developers have recently filed, prior to the announcement, or intended to file during the Pause period. Under an "Approval Only" Pause, the Province and AUC must provide certainty for these projects as the AUC undertakes the upcoming Inquiry, so that projects that have already been delayed by the Pause are not further delayed by the implementation of new policy approaches resulting from the Inquiry.

Greengate recommends that the Commission grandfather the current *Rule 007* approach and any related policies or regulations for any applications filed prior to the release of the Inquiry report. There is clear precedent for the AUC to follow this approach. This approach is consistent with previous *AUC Rule 007* amendments issued over the last decade, within which a clear "effective by" date was included. For instance, the current version of *Rule 007* was approved on March 18, 2022, but not effective until April 25, 2022. Any applications filed prior to April 25 are covered by the previous version of *Rule 007*. Similarly, any applications filed prior to any forthcoming changes to *Rule 007* should be covered by the now-current version of the rule.

Due to the Pause and the broad mandate of the Inquiry, the renewables industry is entering a time of unprecedented uncertainty. The Minister of Affordability and Utilities has been clear that it is the government's intention to limit uncertainty during this period. The best way to reduce uncertainty during this Pause is to ensure that current applicants are evaluated under the most current AUC criteria, as has been the practice during all prior *Rule 007* reviews.

## Phased Approach to Inquiry

The terms of this Inquiry cover a wide range of issues facing the renewable energy industry and the communities in which we operate. There are a number of these issues that may be resolved more easily and more quickly than others. It is recommended that the Commission organize and schedule the Inquiry such that issues that can be managed more quickly are accelerated, with findings for these issues released on an expedited basis rather than holding all recommendations to be released at the conclusion of the Inquiry.

For instance, considerations regarding implementation of mandatory reclamation security requirements for power plants can be addressed reasonably quickly. Many industry participants have already adopted this practice and models are readily available for reference. Developers will be able to outline how they provide acceptable security for project landowners, and the AUC can address formalization if necessary.

Examining the potential for opening Crown lands for wind and solar projects can also be addressed as a separate phase. Greengate views enabling renewable energy development on





**Crown lands as important. Not only are most other energy developments in Alberta permitted on Crown lands but the majority of other provinces can provide a sector-specific model for how renewables could be permitted and access land in these areas. As such, Greengate sees no reason to delay submission of the Inquiry report and extend the Pause in order to achieve this. The Inquiry could simply establish a process to be completed post-Pause.**

**Thank you once again for the opportunity to provide feedback on the development of your Inquiry. It is of utmost urgency to Greengate and our industry that the AUC move quickly on the development of this approach, and to move quickly on the Inquiry itself. Due to the Pause, investment and jobs are being put at risk, and it is critical that it be lifted as soon as possible. Without further information regarding the Inquiry, or details from the report, our industry's future in Alberta is at risk.**

**If you have any questions regarding our views expressed in this response, please do not hesitate to contact me.**

**Best Regards,**

---

Dear AUC Members,

I am writing as a concerned Albertan resident in response to your stakeholder feedback request, dated August 3, 2023<sup>1</sup>. **I respectfully request that the AUC end the pause and immediately recommence approvals for renewable energy projects greater than 1MW.** I believe the decision to pause renewable projects of greater than 1MW<sup>2</sup> is unnecessary, will threaten thousands of jobs, will increase electricity costs for all ratepayers, will stifle billions of dollars in investment, and will slow efforts to address climate change. Alberta is the solar powerhouse of Canada, and we need to maintain our competitive edge.

I understand that you have a number of concerns you are seeking to address<sup>3</sup>:

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If the Government of Alberta and the AUC are unwilling to immediately end the pause, I respectfully request that you continue to fully process new and existing excluded applications without issuing any approvals until after the pause period (Option 3 in your announcement).

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Dear Inquiries

**Generation Approvals Pause Regulation – Order in Council, (O.C.)**

First, we wish to extend our appreciation to Minister Neudorf, Premier Smith and the other MLAs which heard their rural constituents cry for reform in this unprecedented surreal industrialization and destruction of the rural agricultural construct and its outstanding natural beauty.

Secondly, to provide feedback and argument for the complete abeyance, (option 1), of all rural, centralized solar, wind and their subsequent transmission line developments, including N.I.D. applications and time extensions.

1. It is clear that this would be the public's expectation from the verbiage of the 2 O.Cs.
2. In this AUC undertaking, there is the perceived expectation that the moratorium will not result in a wide range of fundamental changes in the approvals process. There are always changes once a moratorium is called and the result may favor a less autocratic approach to the governance of rural renewable energy deployment that the current AUC structure is incapable of delivering. In such decisions made during this moratorium flout the public expectation of this process and may not have continuance.

Similarly, after the demise of the autocratic injustices of the court of King Louis XVI, plebiscites became the norm to solve weighty public questions. In the course of this 6 month moratorium local plebiscites will help define the tolerable limits of the industrialization of the southern Alberta landscape.

3. As the O.C. is to consider the impact of power plant development on Alberta's pristine viewscapes, the hundreds of kilometers of associated transmission lines, are indeed unwanted vulgar accessories to Alberta's pristine viewscapes as are wind turbines and clear subject matter core to this moratorium. Transmission lines are far more mortal to birds and airborne Mammalia than turbines.
4. First and foremost, M.D.s need to determine local suitability of power plant placement. Metrics of soil quality, proximity to existing transmission lines, land use incompatibility and ratepayer objections are to be taken into account before any lands are open for consideration for development. It is obvious, trying to deal with these local public priorities sanely in a forum where corporate greed dominates is impossible. In other countries, this order shift shortens approval timelines as confrontation fades and acceptable co-existence is achieved.
5. Land swaps for existing approved power projects is a precedent option for inappropriately placed energy projects; pioneered by the Saskatchewan government in the 80s and should be an option in Alberta going forward.

6. The proposed exemptions from the moratorium and now rushed line and connection approval advancement may terminate to land no longer hosting a power plant. These proposed carve out exemptions may also have sizeable benefits to proponents that members of AUC have worked for in the past. The optics are not good.
7. There is almost no focus on reliability nor 24/7 coverage in the current R.E. strategy. Power plants or transmission lines should have associated battery storage to emulate historic demand profiles. Nameplate capacity is a useless metric if not available when needed. The absolute need for reliability and redundancy cannot be understated. For re-enforcement on the criticality of this feature a sober look at the recent disastrous grid failure of N.S.W. Australia should be undertaken to understand the effect of exuberant myopic R.E. goals.
8. Transmission lines built for nameplate capacity and never filled, is a waste of land resources which favors decentralized R.E. development as the most pragmatic approach to solving societal energy woes. The acronym NIMBY is now replaced by WNIYBY; why not in your back yard. Why are city residential projects still being approved WITHOUT full solar power coverage on their roofs? This is a rhetorical question as it seems city people prefer the destruction of the rural neighborhood over embracing the solution to their own energy indulgences in their own back yard, quite narcissistic. Black panels covering black roofs have less of a carbon or net thermal footprint than covering green fields with black solar panels. Why is the city of Calgary's R.E. plan or any urban R.E. solution not being funded by the federal government?
9. It is incorrect to consider *single operator* proprietary sales lines as transmission lines, rather they are collector lines not subject to arbitrary processes. Such single operator proprietary sales lines must be buried. Viewscapes ARE that important to people, consider that in Canmore HV transmission lines were buried as to not impair the visual treat of an unindustrialized view of the Three Sisters. In Europe, the burial of long distance T.L.s are now common.
10. Even traditionally green minded groups are speaking out against the indiscriminate and inappropriate placement of solar energy projects. Case in point, green environmental groups in Puerto Rico are currently suing their government for the loss of high grade agricultural and rustic land – a violation of local laws. They argue there is plenty of land base in the major cities to solve their energy needs; roofs, parking lots, landfills, etc.; (Associated Press, August 14<sup>th</sup>, 2023)

Thirdly, The AUC and its constraining mandate and rules must take certain responsibility for the free-for-all destruction of everything good about rural Alberta. The legitimacy of the AUC process in matters concerning the rural society has been completely eroded over the last year.

Predominantly the AUC rules in the Corporate Interest, veiled as in the Public Interest, relying heavily on legal perspectives. This is not how humanity works. The functioning of a just society considers other civil perspectives. This status quo process may be suitable to manage dust-ups between TFOs and ISOs, however lacks in sufficient democratic and ethical humanistic

principals and does not satisfy the public requisite of the "Appearance of Fairness". To list a few.

1. Disrespect for historic land use.
2. No interest in logical control of power facility placement, M.D.s are not included.
3. Its active participation in the removal and destruction of agricultural grade land.
4. Inadmissibility of perspective; the majority of the commission are lawyers, not from the rural areas and we suspect not even from the province of Alberta in which their governance is applied.
5. Appearance of conflict of interest; a sizeable percentage of commission members with employment or association with energy exploiters and companies like AltaLink, Maskwa or both. The legacy bias from previous corporate perspectives having opportunity to manifest in matters of public interest is objectionable. Additionally this would include recusal from this process due to the appearance of said bias.
6. The commissioners are appointed, and as usually the case comes with politically aligned expectations on appointment. Considering the magnitude and finality of the negative impacts to rural landscape and the long standing functioning agricultural society that will now last a millennium, a more inclusive, process with real representation of the rural public that are having their lives compromised demands a cleaner transparent less autocratic process.
7. No oversight board, lack of adherence to its own rules, or respect for rules and governance by other jurisdiction. It is all legal a legal mind would say, but is it morally consistent with public sentiment: changes are required.
8. No representation of the rural public now being industrialized is at the decision making table.
9. Clean energy should be developed with clean money by reputable full cycle developers. There may only be a couple commission members able to adequately undertake such vetting and the result is stalled projects after one or two flips, by non-assessed, underfunded, shell entities incapable of delivering the project. The quantity of time extensions in progress is conclusive attestation of the Wild Wild West flavor of the current R.E. proliferation. The project initiators are long gone, papering up another violation to the natural landscape and the dysfunction is repeated.

The pathway to equitably share the land cannot be left to barren corporate morals via existing unfair legal framework at the expense of the current stewards of the land. The acceleration of process also cannot be done by further draconian measures against its citizenry.

My name is XXXXXXXXXXXX and I own land in the Northern Valley where a wind project is being proposed. I would like to make known, as a stakeholder, that it is necessary that a “complete abeyance” be enacted in order to properly review the entire regulatory application process. My legal representation, Willms & Shier, has explained our rationale, which I have attached to this email.

I'm against seeing these wind turbines in the Northern Valley area near my home. They will ruin the natural beauty in the area. We know they will create a lot of noise. I have personally been around windmills and I know first hand the noise they create and the number of birds they kill. For me this is a concern to all birds including the endangered whooping cranes that migrate through the Northern Valley area. On my property I have seen numerous hawks nesting and I have also seen owls as well. My property has an abundance of other wildlife as well, including bear, deer and moose. As an avid hunter I also rely on these animals to feed my family every year. Should they leave this area due to this noise this will affect our family's food supply. South east of 12 56 6 has been left unfarmed for the last 30 years to provide food and shelter for the wildlife in the area. The turbines will no doubt affect how safe the wildlife feel in this safe haven since they are proposing to put the turbines very close to this area. We have photo evidence of all the animals in the area thanks to our scouting effects prior to every hunting season. We also had plans on putting another family residence on that quarter so if they proceed with the project then that will affect those plans.

We know that the turbines will negatively affect the property value of nearby land thus eventually affecting the value of my family farm should the project go ahead, In regards to livestock I will have horses across from one of the turbines being built. The potential health effects to them and other livestock simply isn't worth the risk to me.

Thank you for taking the time to read my email.

Sincerely,

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# AUC

Alberta Utilities Commission

**Re: Six-Month Approvals Pause Feedback - Northern Valley Families Support a Complete Abeyance of Approvals for New Renewable Electricity Generation**

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Willms & Shier Environmental Lawyers LLP is environmental legal counsel to approximately 50 families in Northern Valley, Alberta. Our clients reside immediately adjacent to the Northern Valley Wind Project currently proposed by Elemental Energy.

We understand that the Alberta Utilities Commission (the “AUC”) is seeking stakeholder feedback about its implementation of a six-month moratorium on approvals for new renewable electricity generation.

For the reasons outlined below, our clients respectfully submit that a six-month complete abeyance of approvals is appropriate during which time the AUC:

- 1 does not accept new applications,
- 2 places all existing excluded applications on hold, and
- 3 takes no further steps to complete their record or issue decisions.

### **COMPLETE ABEYANCE OF APPROVALS NECESSARY FOR PROCESS RE-EVALUATION**

Our clients strongly support a review of the entire AUC approvals process. This includes addressing issues spanning from the signing of lease options before public consultation, to the lack of input from communities on Alberta Environment and Protected Area environmental reports, through to the AUC’s mandate and its applicable test for granting approvals.

Given the ongoing re-evaluation of the entire AUC process, our clients' view is that a complete abeyance of approvals during the six-month moratorium is the most appropriate course of action.

The alternate options being considered by the AUC, including a partial abeyance or a hold on issuing approvals until after the moratorium, are not consistent with the purpose of the AUC process review. Under these options, if the public inquiry leads to changes in the AUC approvals process, existing applications would likely have to be resubmitted and reviewed again at significant time and financial expense to all parties involved. Similarly, existing projects in the pre-AUC application phase may be preparing materials based on a set of requirements that may change.

### **COMPLETE ABEYANCE REQUIRED FOR PROCEDURAL FAIRNESS**

Taking any approach other than a complete abeyance during the review process would, in our view, also breach the principles of procedural fairness and legitimate expectation.

The Supreme Court of Canada in *Baker v Canada (Minister of Citizenship & Immigration)* set out guiding principles as follows:<sup>1</sup>

... if a legitimate expectation is found to exist, this will affect the content of the duty of fairness owed to the individual or individuals affected by the decision. If the claimant has a legitimate expectation that a certain procedure will be followed, this procedure will be required by the duty of fairness: . . . . Nevertheless, the doctrine of legitimate expectations cannot lead to substantive rights outside the procedural domain. This doctrine, as applied in Canada, is based on the principle that the "circumstances" affecting procedural fairness take into account the promises or regular practices of administrative decision-makers, and that it will generally be unfair for them to act in contravention of representations as to procedure, or to backtrack on substantive promises without according significant procedural rights. [Emphasis added, portions of the quoted paragraph and citations omitted.]

*Schwarz Hospitality Group Ltd. v. Canada (Minister of Canadian Heritage)*<sup>2</sup> followed *Baker* and presents a cautionary take for administrative decision-makers in the midst of a moratorium.

In *Schwarz*, the Minister of Canadian Heritage imposed a one-year development moratorium for certain types of development in Banff National Park for the purpose of reviewing the guidelines applicable in the circumstances. Notwithstanding the moratorium, Officials at Parks Canada continued to consult with a developer about an existing development proposal.

This ongoing consultation – akin to the partial abeyance options being considered by the AUC – resulted in the developer successfully bringing a *mandamus* order against Parks Canada requiring Parks Canada to adjudicate on the developer's proposal in accordance with the original approval process and guidelines in place before the moratorium was implemented.

This outcome was entirely antithetical to the purpose of the moratorium.

### **CONCLUSION**

Our clients respectfully submit that a complete abeyance moratorium, rather than a partial one, is the best course of action to both:

- 1 permit all stakeholders and the AUC to start afresh under any revised AUC procedures, and
- 2 maintain consistency within the AUC's existing duty of procedural fairness.

Yours truly,



Dear AUC members,

The following is a form letter from Solar Alberta. I am resending it as I agree with everything written in it and want to add my voice to those dismayed by the pause in renewables. Real jobs depend on this action and current and future investments in this province. The world is moving on from fossil fuels and we risk being left behind. Albertans are paying some of the highest prices for electricity in the country and renewables provide cheap power. The provinces with high electricity prices all have reliance on fossil fuels in common. With the increases in the carbon tax for GHG intensive energy, Albertans will continue to pay increasingly more if our grid is not decarbonized. All of this, on top of a country that is currently burning all around us; there is no more time to delay in switching to renewable energy.

I am writing as a concerned Albertan resident in response to your stakeholder feedback request, dated August 3, 2023<sup>1</sup>. **I respectfully request that the AUC end the pause and immediately recommence approvals for renewable energy projects greater than 1MW.** I believe the decision to pause renewable projects of greater than 1MW<sup>2</sup> is unnecessary, will threaten thousands of jobs, will increase electricity costs for all ratepayers, will stifle billions of dollars in investment, and will slow efforts to address climate change. Alberta is the solar powerhouse of Canada, and we need to maintain our competitive edge.

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Thank you for considering my request. I am happy to be contacted for further comment.

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Thank you for considering my request.

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To whom it may concern,

Established in 1994, EDI Environmental Dynamics Inc. (EDI) is a Canadian employee-owned biology and environmental services company based across Northern and Western Canada. We specialize in baseline inventory, environmental impact/risk assessment, and environmental planning and implementation to support a variety of sectors, including a broad portfolio of renewable energy projects throughout Alberta. EDI advises and supports these projects during their entire development cycle — from start to finish — to facilitate timely and effective environmental risk assessment, planning and permitting, environmental monitoring/compliance, and reclamation/closure.

EDI understands that the Alberta Utilities Commission (AUC) is seeking stakeholder feedback on implementing the approval pause for checklist and new power plant applications for wind, solar, and other power plants (e.g., geothermal, sustainable biomass), as well as for both new and amended applications for hydroelectric power plants and hydro developments. Specifically, the AUC is looking for stakeholders to comment on the following options: complete abeyance, partial abeyance, and approval hold only.



Of these three options, EDI recommends an approval hold only, where the AUC continues to fully process new and existing excluded applications throughout the pause period. Renewable energy projects have already been delayed in 2023 by a large queue for renewable energy referral reports from Alberta Environment and Protected Areas (EPA). EPA timelines are presently extending over 6 months from application submission to referral report receipt. A further 6-month delay in AUC application submission and processing during the approvals pause will increase regulatory timelines for renewable energy projects. In addition, a complete or partial abeyance scenario during the approvals pause is expected to further increase regulatory delays as the AUC will be addressing a large backlog of applications on March 1, 2024. By allowing new and existing applications to be processed throughout the approvals pause, it is expected that some of these timeline delays will be mitigated.

To reduce regulatory uncertainty, EDI also recommends that any updated policy, directives, rules, or other requirements that result from the AUC inquiry during the approvals pause become effective for any new renewable energy project applications submitted after March 1, 2024. AUC applications submitted before March 1, 2024 would still be required to follow the existing process, but should not be subject to any regulatory change that may be announced on or before February 29, 2024.

Thank you for this opportunity to provide feedback. If you have any questions or require any further clarification please do not hesitate to get in touch.

All the best,

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Dear AUC Members,

I am writing as a concerned Albertan resident in response to your stakeholder feedback request, dated August 3, 2023<sup>1</sup>. **I respectfully request that the AUC end the pause and immediately**



**recommence approvals for renewable energy projects greater than 1MW.** I believe the decision to pause renewable projects of greater than 1MW<sup>2</sup> is unnecessary, will threaten thousands of jobs, will increase electricity costs for all ratepayers, will stifle billions of dollars in investment, and will slow efforts to address climate change. Alberta is the solar powerhouse of Canada, and we need to maintain our competitive edge.

I understand that you have a number of concerns you are seeking to address<sup>3</sup>:

- With respect to **land reclamation** concerns, please note that solar sites will remain viable well past the end of life of the original panels, and this will significantly reduce land reclamation needs. Additionally, The Government of Alberta already has reclamation [Guidelines for Renewable Energy Operations](#) which address this matter.
- With respect to **end of life** concerns for renewable energy infrastructure disposal, the Alberta Recycling Management Authority (ARMA) is already piloting reuse and recycle programs for solar PV. Given that the majority of solar being installed today will be in operation for well over 25 years, ARMA is really out ahead on this matter.
- With respect to **land use** concerns, such as food security, wetland preservation and wildlife conservation, Solar Alberta has already created highly relevant Solar Siting Recommendations: <https://solaralberta.ca/solar-siting-recommendations/>. I believe you could review and adopt protocols such as these without a pause on approvals.

If the Government of Alberta and the AUC are unwilling to immediately end the pause, I respectfully request that you continue to fully process new and existing excluded applications without issuing any approvals until after the pause period (Option 3 in your announcement).

Thank you for considering my request.

Sincerely,

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Dear Alberta Utility Commission Members,

Today I am writing in response to your stakeholder's feedback request. At the direction/initiative of the Government of Alberta through an order-in-council: "The Generation Approval Pause Regulation", this Moratorium on approvals for Renewable Energy greater than 1 MW, was introduced. Please cancel this moratorium, it is unprecedented and does NOT serve Albertans. It will threaten thousands of jobs, increase electricity costs for all ratepayers, stifle billions of \$\$ in investments, and slow efforts to combat climate change. We need to continue approvals and launch an open, transparent, and meaningful review of these projects.

With respect to land reclamation, solar sites will remain viable past the end of life of the original panels, this will significantly reduce land reclamation needs. The Government of Alberta already has reclamation guidelines for Renewable operations.



With respect to end-of-life concerns for renewable energy infrastructure, the Alberta Recycling Management Authority is already piloting reuse and recycle programs for PV. Given that Solar Panels will be in operation for well over 25 yrs. ARMA is already on this matter!

With respect to land use concerns, food security, wetland preservation, and wildlife conservation: Solar Alberta has already created highly relevant Solar Siting Recommendations. I believe you could review and adapt protocols without a pause on approvals.

If the Government of Alberta and the Alberta Utility Commission are unwilling to immediately end this moratorium, I respectfully request that you continue to fully process new and existing excluded applications without any approvals until after the pause period in your announcement.

Respectfully,

---

Dear AUC Members,

I am writing as a concerned Albertan resident in response to your stakeholder feedback request, dated August 3, 2023<sup>1</sup>. **I respectfully request that the AUC end the pause and immediately recommence approvals for renewable energy projects greater than 1MW.** I believe the decision to pause renewable projects of greater than 1MW<sup>2</sup> is unnecessary, will threaten thousands of jobs, will increase electricity costs for all ratepayers, will stifle billions of dollars in investment, and will slow efforts to address climate change. Alberta is the solar powerhouse of Canada, and we need to maintain our competitive edge.

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If the Government of Alberta and the AUC are unwilling to immediately end the pause, I respectfully request that you continue to fully process new and existing excluded applications without issuing any approvals until after the pause period (Option 3 in your announcement).



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My 18 year old son is hoping to train as an electrician with a specialization in solar installations. His ability to enter a registered apprenticeship program will be compromised by this pause.

My 15 year old suffers from eco-anxiety over adult inaction in the face of the climate crisis. This development pause was extremely discouraging for him.

I understand that you have a number of concerns you are seeking to address<sup>3</sup>:

- With respect to **land reclamation** concerns, please note that solar sites will remain viable well past the end of life of the original panels, and this will significantly reduce land reclamation needs. Additionally, The Government of Alberta already has reclamation [Guidelines for Renewable Energy Operations](#) which address this matter.
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If the Government of Alberta and the AUC are unwilling to immediately end the pause, I respectfully request that you continue to fully process new and existing excluded applications without issuing any approvals until after the pause period (Option 3 in your announcement).

Thank you for considering my request.

Dear AUC Members,

I am writing as a concerned Albertan resident in response to your stakeholder feedback request, dated August 3, 2023<sup>1</sup>. I respectfully request that the AUC end the pause and immediately recommence approvals for renewable energy projects greater than 1MW. I believe the decision to pause renewable projects of greater than 1MW<sup>2</sup> is unnecessary, will threaten thousands of jobs, will increase electricity costs for all ratepayers, will stifle billions of dollars in investment, and will slow efforts to address climate change. Alberta is the solar powerhouse of Canada, and we need to maintain our competitive edge.

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If the Government of Alberta and the AUC are unwilling to immediately end the pause, I respectfully request that you continue to fully process new and existing excluded applications without issuing any approvals until after the pause period (Option 3 in your announcement).

Thank you for considering my request.

Sincerely,

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My name is XXXXXXXXXXX and I own a quarter section of land (which has been in our family for nearly 100 years) in the Northern Valley where Elemental Energy is proposing a wind project. As a stakeholder I know it is necessary that a "complete abeyance" be enacted to properly review the entire regulatory application process. I attended what was to be an information session set up by Elemental Energy. The company representatives there could not answer our questions. After giving my name, phone number, email and a list of questions I have heard nothing of the promised answers. I simply cannot understand why this process is cloaked in silence and secrecy, when it affects so many families and a huge swath of the environment they live in.

This province has hundreds of thousands of hectares of land that are void of people, why is money the only true reason a site is picked?

My legal representation, Willms & Shier, has explained our rationale, I have attached their email

Thanks for your time

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**Re: Six-Month Approvals Pause Feedback - Northern Valley Families Support a Complete Abeyance of Approvals for New Renewable Electricity Generation**

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Willms & Shier Environmental Lawyers LLP is environmental legal counsel to approximately 50 families in Northern Valley, Alberta. Our clients reside immediately adjacent to the Northern Valley Wind Project currently proposed by Elemental Energy.

We understand that the Alberta Utilities Commission (the "AUC") is seeking stakeholder feedback about its implementation of a six-month moratorium on approvals for new renewable electricity generation.

For the reasons outlined below, our clients respectfully submit that a six-month complete abeyance of approvals is appropriate during which time the AUC:

- 1 does not accept new applications,
- 2 places all existing excluded applications on hold, and
- 3 takes no further steps to complete their record or issue decisions.

**COMPLETE ABEYANCE OF APPROVALS NECESSARY FOR PROCESS RE-EVALUATION**

Our clients strongly support a review of the entire AUC approvals process. This includes addressing issues spanning from the signing of lease options before public consultation, to the lack of input from communities on Alberta Environment and Protected Area environmental reports, through to the AUC's mandate and its applicable test for granting approvals.

Given the ongoing re-evaluation of the entire AUC process, our clients' view is that a complete abeyance of approvals during the six-month moratorium is the most appropriate course of action.

The alternate options being considered by the AUC, including a partial abeyance or a hold on issuing approvals until after the moratorium, are not consistent with the purpose of the AUC process review. Under these options, if the public inquiry leads to changes in the AUC approvals process, existing applications would likely have to be resubmitted and reviewed again at significant time and financial expense to all parties involved. Similarly, existing projects in the pre-AUC application phase may be preparing materials based on a set of requirements that may change.

### **COMPLETE ABEYANCE REQUIRED FOR PROCEDURAL FAIRNESS**

Taking any approach other than a complete abeyance during the review process would, in our view, also breach the principles of procedural fairness and legitimate expectation.

The Supreme Court of Canada in *Baker v Canada (Minister of Citizenship & Immigration)* set out guiding principles as follows:<sup>1</sup>

... if a legitimate expectation is found to exist, this will affect the content of the duty of fairness owed to the individual or individuals affected by the decision. If the claimant has a legitimate expectation that a certain procedure will be followed, this procedure will be required by the duty of fairness: . . . . Nevertheless, the doctrine of legitimate expectations cannot lead to substantive rights outside the procedural domain. This doctrine, as applied in Canada, is based on the principle that the "circumstances" affecting procedural fairness take into account the promises or regular practices of administrative decision-makers, and that it will generally be unfair for them to act in contravention of representations as to procedure, or to backtrack on substantive promises without according significant procedural rights. [Emphasis added, portions of the quoted paragraph and citations omitted.]

*Schwarz Hospitality Group Ltd. v. Canada (Minister of Canadian Heritage)*<sup>2</sup> followed *Baker* and presents a cautionary take for administrative decision-makers in the midst of a moratorium.

In *Schwarz*, the Minister of Canadian Heritage imposed a one-year development moratorium for certain types of development in Banff National Park for the purpose of reviewing the guidelines applicable in the circumstances. Notwithstanding the moratorium, Officials at Parks Canada continued to consult with a developer about an existing development proposal.

This ongoing consultation – akin to the partial abeyance options being considered by the AUC – resulted in the developer successfully bringing a *mandamus* order against Parks Canada requiring Parks Canada to adjudicate on the developer's proposal in accordance with the original approval process and guidelines in place before the moratorium was implemented.

This outcome was entirely antithetical to the purpose of the moratorium.

### **CONCLUSION**

Our clients respectfully submit that a complete abeyance moratorium, rather than a partial one, is the best course of action to both:

- 1 permit all stakeholders and the AUC to start afresh under any revised AUC procedures, and
- 2 maintain consistency within the AUC's existing duty of procedural fairness.

Yours truly,

Dear Premier Smith,

I am writing as a concerned Albertan resident to **request that you end the pause and immediately recommence approvals for renewable energy projects greater than 1MW.**

I believe the decision to pause renewable projects greater than 1 MW is unnecessary, will threaten thousands of jobs, will increase electricity costs for all ratepayers, will stifle billions of dollars in investment, and will slow efforts to address climate change. The moratorium is also counter to the longstanding legislated market principle of fair, efficient, open, and competitive management of Alberta's electrical utilities.

I understand that you have a number of concerns you are seeking to address:

- With respect to **land reclamation** concerns, please note that solar sites will remain viable well past the end of life of the original panels, and this will significantly reduce land reclamation needs. Additionally, the Government of Alberta already has reclamation [Guidelines for Renewable Energy Operations](#) which address this matter.
- With respect to **end of life** concerns for renewable energy infrastructure disposal, the Alberta Recycling Management Authority (ARMA) is already piloting reuse and recycle programs for solar PV. Given that the majority of solar being installed today will be in operation for over 25 years, ARMA is ahead on this matter.
- With respect to **land use** concerns, such as food security, wetland preservation, and wildlife conservation, Solar Alberta has already created highly relevant [Solar Siting Recommendations](#). I believe you could review and adopt protocols such as these without a pause on approvals.
- With respect to **grid reliability** concerns, we are many years out from any grid reliability issues attributable to renewables and there is ample evidence to prove that these issues can and will be addressed by increased energy storage capacity. In fact, a significant portion of solar farm developments in Alberta already have energy storage capacity integrated into their plans.

Alberta is the solar powerhouse of Canada, and we need to maintain our competitive edge.

Thank you for considering my request.

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FEEDBACK RE: PAUSE ON RENEWABLES APPROVALS

Dear AUC Members,



I am writing as a concerned Albertan resident in response to your stakeholder feedback request, dated August 3, 2023<sup>1</sup>. **I respectfully request that the AUC end the pause and immediately recommence approvals for renewable energy projects greater than 1MW.** I believe the decision to pause renewable projects of greater than 1MW<sup>2</sup> is unnecessary, will threaten thousands of jobs, will increase electricity costs for all ratepayers, will stifle billions of dollars in investment, and will slow efforts to address climate change. Alberta is the solar powerhouse of Canada, and we need to maintain our competitive edge.

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If the Government of Alberta and the AUC are unwilling to immediately end the pause, I respectfully request that you continue to fully process new and existing excluded applications without issuing any approvals until after the pause period (Option 3 in your announcement).

Thank you for considering my request.

Sincerely,

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Dear AUC Members,

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If the Government of Alberta and the AUC are unwilling to immediately end the pause, I respectfully request that you continue to fully process new and existing excluded applications without issuing any approvals until after the pause period (Option 3 in your announcement).

Thank you for considering my request.

Sincerely,

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Re: Restore confidence: minimize renewable energy inquiry impacts

Dear Chief Executive:

The Alberta Utilities Commission should apply as narrow a scope as possible to their pause on approvals as they conduct their seven-month inquiry.

Alberta's provincial government announced the inquiry and moratorium on new renewable energy development projects on August 3. There had been no prior consultation with affected corporations prior to the announcement. The move brought tremendous investment risk and uncertainty to the nation-leading renewable energy industry in Alberta.

The AUC asked for feedback from stakeholders on which of three options they should use to implement the approval pause. The options range from bad to worse. The AUC is encouraged to take every action available to restore some level of investor confidence. This means pausing approvals only.

The other options included: not accepting new applications or continuing with any processing during the pause period; or, not accepting new applications and only partially processing existing applications.

In addition, there is worry that the Alberta government will backcast its regulatory reach and apply new



rules to existing wind and solar farms. The AUC should make clear from the beginning of the inquiry that the policy recommendations resulting from the inquiry will not apply to solar and wind farms that are already operating, projects that have received approval, or projects that have already applied to the AUC.

In the meantime, the best move is limiting investment risk and damage for the government to remove the unnecessary and costly moratorium and utilize existing regulatory processes to address concerns.

The Minister of Affordability and Utilities has stated publicly that only 15 projects — those already in the AUC application process — are affected by the approvals pause. This clearly indicates the Minister's intent that only approvals should be paused.

The government has stated clearly and repeatedly that the inquiry, and the associated pause, are meant to bring greater certainty for renewable energy investment. This can only be accomplished if the rules governing projects are not changed mid-development.

Investors should not have to wait until the end of the inquiry and the subsequent government policy development processes to gain certainty and clarity around the projects that they have in-flight. Only with immediate, clear statements on the scope of application of forthcoming policy and regulatory changes can investor confidence begin to be restored in Alberta's electricity market and regulatory regime.

#### Quick facts

As of the second quarter of 2023, corporate renewable energy deals in Alberta have supported nearly \$4.7 billion in new capital investment and provided thousands of jobs (since 2019).

Once all of the projects to be completed in Alberta by the end of 2023 are operating, they will support ongoing local economic activity, such as spending for operations and maintenance, including over \$10 million per year in municipal property tax payments and another \$10 million in annual lease payments to rural landowners.

There are currently 75 solar and 20 wind projects that have been announced or are in the pipeline for regulatory approval in Alberta, according to the latest Alberta Electric System Operator long-term adequacy quarterly report. These projects could be stalled entirely by this moratorium unless the AUC continues to accept applications.

Yours sincerely,

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Dear AUC Members,

I am writing as a concerned Albertan resident in response to your stakeholder feedback request, dated August 3, 2023<sup>1</sup>. **I respectfully request that the AUC end the pause and immediately recommence approvals for renewable energy projects greater than 1MW.**





I believe the decision to pause renewable projects of greater than 1MW<sup>2</sup> is unnecessary, will threaten thousands of jobs, will increase electricity costs for all ratepayers, will stifle billions of dollars in investment, and will slow efforts to address climate change. Alberta is the solar powerhouse of Canada, and we need to maintain our competitive edge.

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- With respect to **land use** concerns, such as food security, wetland preservation and wildlife conservation, Solar Alberta has already created highly relevant Solar Siting Recommendations: <https://solaralberta.ca/solar-siting-recommendations/>. I believe you could review and adopt protocols such as these without a pause on approvals.

If the Government of Alberta and the AUC are unwilling to immediately end the pause, I respectfully request that you continue to fully process new and existing excluded applications without issuing any approvals until after the pause period (Option 3 in your announcement).

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With respect to land reclamation concerns, please note that solar sites will remain viable well past the end of life of the original panels, and this will significantly reduce land reclamation needs. Additionally,



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If the Government of Alberta and the AUC are unwilling to immediately end the pause, I respectfully request that you continue to fully process new and existing excluded applications without issuing any approvals until after the pause period (Option 3 in your announcement).

Thank you for considering my request.

Regards,

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Dear AUC Members,

I am writing as a concerned Albertan resident in response to your stakeholder feedback request, dated August 3, 2023.

As a taxpaying, born and raised Albertan,

I respectfully request that the AUC end the pause and immediately recommence approvals for renewable energy projects greater than 1MW. I believe the decision to pause renewable projects of greater than 1MW is shortsighted, unnecessary, will threaten thousands of jobs, will increase electricity costs for all ratepayers, will stifle billions of dollars in investment, and will slow efforts to address climate change. Alberta is the solar powerhouse of Canada, and we need to maintain our competitive edge.

I understand that you have a number of concerns you are seeking to address: With respect to land reclamation concerns, please note that solar sites will remain viable well past the end of life of the original panels, and this will significantly reduce land reclamation needs. Additionally, The Government of Alberta already has reclamation Guidelines for Renewable Energy Operations which address this matter. With respect to end of life concerns for renewable energy infrastructure disposal, the Alberta Recycling Management Authority (ARMA) is already piloting reuse and recycle programs for solar PV. Given that the majority of solar being installed today will be in operation for well over 25 years, ARMA is really out ahead on this matter. With respect to land use concerns, such as food security, wetland preservation and wildlife conservation, Solar Alberta has already created highly relevant Solar Siting Recommendations: <https://solaralberta.ca/solar-siting-recommendations/>.

I believe you could review and adopt protocols such as these without a pause on approvals. If the Government of Alberta and the AUC are unwilling to immediately end the pause, I respectfully request that you continue to fully process new and existing excluded applications without issuing any approvals until after the pause period (Option 3 in your announcement).

Thank you for your consideration of my request.

Sincerely,

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**Deadline:** No later than August, 18, 2023  
*All submissions will be publicly available*

**Subject Line:** Feedback re: Pause on Renewables Approvals

Dear AUC Members,

I am writing as a concerned Albertan resident in response to your stakeholder feedback request, dated August 3, 2023<sup>1</sup>. **I respectfully request that the AUC end the pause and immediately recommence approvals for renewable energy projects greater than 1MW.** I believe the decision to pause renewable projects of greater than 1MW<sup>2</sup> is unnecessary, will threaten thousands of jobs, will increase electricity costs for all ratepayers, will stifle billions of dollars in investment, and will slow efforts to address climate change. Alberta is the solar powerhouse of Canada, and we need to maintain our competitive edge.

If the Government of Alberta and the AUC are unwilling to immediately end the pause, I respectfully request that you continue to fully process new and existing excluded applications without issuing any approvals until after the pause period (Option 3 in your announcement).

Thank you for considering my request.

Sincerely,

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Dear AUC Members,

I am writing as a concerned Albertan resident in response to your stakeholder feedback request, dated August 3, 2023<sup>1</sup>. **I respectfully request that the AUC end the pause and immediately recommence approvals for renewable energy projects greater than 1MW.** I believe the decision to pause renewable projects of greater than 1MW is unnecessary, will threaten thousands of jobs, will increase electricity costs for all ratepayers, will stifle billions of dollars in investment, and will slow efforts to address climate change. Alberta is the solar powerhouse of Canada, and we need to maintain our competitive edge.

I understand that you have a number of concerns you are seeking to address:

1. With respect to land reclamation concerns, please note that solar sites will remain viable well past the end of life of the original panels, and this will significantly reduce land reclamation needs. Additionally, The Government of Alberta already has reclamation Guidelines for Renewable Energy Operations which address this matter.
2. With respect to end of life concerns for renewable energy infrastructure disposal, the Alberta Recycling Management Authority (ARMA) is already piloting reuse and recycle programs for solar PV. Given that the majority of solar being installed today will be in operation for well over 25 years, ARMA is really out ahead on this matter.



3. With respect to land use concerns, such as food security, wetland preservation and wildlife conservation, Solar Alberta has already created highly relevant Solar Siting Recommendations: <https://solaralberta.ca/solar-siting-recommendations/>. I believe you could review and adopt protocols such as these without a pause on approvals.

If the Government of Alberta and the AUC are unwilling to immediately end the pause, I respectfully request that you continue to fully process new and existing excluded applications without issuing any approvals until after the pause period (Option 3 in your announcement).

Thank you for considering my request.

Sincerely,

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Dear AUC Members,

I am writing as a concerned Albertan resident in response to your stakeholder feedback request, dated August 3, 2023<sup>1</sup>. **I respectfully request that the AUC end the pause and immediately recommence approvals for renewable energy projects greater than 1MW.** I believe the decision to pause renewable projects of greater than 1MW<sup>2</sup> is unnecessary, will threaten thousands of jobs, will increase electricity costs for all ratepayers, will stifle billions of dollars in investment, and will slow efforts to address climate change. Alberta is the solar powerhouse of Canada, and we need to maintain our competitive edge.

I understand that you have a number of concerns you are seeking to address<sup>3</sup>:

- With respect to **land reclamation** concerns, please note that solar sites will remain viable well past the end of life of the original panels, and this will significantly reduce land reclamation needs. Additionally, The Government of Alberta already has reclamation [Guidelines for Renewable Energy Operations](#) which address this matter.
- With respect to **end of life** concerns for renewable energy infrastructure disposal, the Alberta Recycling Management Authority (ARMA) is already piloting reuse and recycle programs for solar PV. Given that the majority of solar being installed today will be in operation for well over 25 years, ARMA is really out ahead on this matter.
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If the Government of Alberta and the AUC are unwilling to immediately end the pause, I respectfully request that you continue to fully process new and existing excluded applications without issuing any approvals until after the pause period (Option 3 in your announcement).

Thank you for considering my request.

**Subject Line:** Feedback re: Pause on Renewables Approvals

August 19, 2023

Dear AUC Members,

I am writing as a concerned Albertan resident in response to your stakeholder feedback request, dated August 3, 2023<sup>1</sup>. **I respectfully request that the AUC end the pause and immediately recommence approvals for renewable energy projects greater than 1MW.** I believe the decision to pause renewable projects of greater than 1MW<sup>2</sup> is unnecessary, will threaten thousands of jobs, will increase electricity costs for all ratepayers, will stifle billions of dollars in investment, and will slow efforts to address climate change. Alberta is the solar powerhouse of Canada, and we need to maintain our competitive edge.

I understand that you have a number of concerns you are seeking to address<sup>3</sup>:

- With respect to **land reclamation** concerns, please note that solar sites will remain viable well past the end of life of the original panels, and this will significantly reduce land reclamation needs. Additionally, The Government of Alberta already has reclamation [Guidelines for Renewable Energy Operations](#) which address this matter.
- With respect to **end of life** concerns for renewable energy infrastructure disposal, the Alberta Recycling Management Authority (ARMA) is already piloting reuse and recycle programs for solar PV. Given that the majority of solar being installed today will be in operation for well over 25 years, ARMA is really out ahead on this matter.
- With respect to **land use** concerns, such as food security, wetland preservation and wildlife conservation, Solar Alberta has already created highly relevant Solar Siting Recommendations: <https://solaralberta.ca/solar-siting-recommendations/>. I believe you could review and adopt protocols such as these without a pause on approvals.

If the Government of Alberta and the AUC are unwilling to immediately end the pause, I respectfully request that you continue to fully process new and existing excluded applications without issuing any approvals until after the pause period (Option 3 in your announcement).

Thank you for considering my request.

Sincerely,

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I am writing as a concerned Albertan resident in response to your stakeholder feedback request, dated August 3, 2023<sup>1</sup>. **I respectfully request that the AUC end the pause and immediately recommence approvals for renewable energy projects greater than 1MW.** I believe the decision to pause renewable projects of greater than 1MW<sup>2</sup> is unnecessary, will threaten thousands of jobs, will increase electricity costs for all ratepayers, will stifle billions of dollars in investment, and will slow efforts to address climate change. Alberta is the solar powerhouse of Canada, and we need to maintain our competitive edge.

I understand that you have a number of concerns you are seeking to address<sup>3</sup>:

- With respect to **land reclamation** concerns, please note that solar sites will remain viable well past the end of life of the original panels, and this will significantly reduce land reclamation needs. Additionally, The Government of Alberta already has reclamation [Guidelines for Renewable Energy Operations](#) which address this matter.
- With respect to **end of life** concerns for renewable energy infrastructure disposal, the Alberta Recycling Management Authority (ARMA) is already piloting reuse and recycle programs for solar PV. Given that the majority of solar being installed today will be in operation for well over 25 years, ARMA is really out ahead on this matter.
- With respect to **land use** concerns, such as food security, wetland preservation and wildlife conservation, Solar Alberta has already created highly relevant Solar Siting Recommendations: <https://solaralberta.ca/solar-siting-recommendations/>. I believe you could review and adopt protocols such as these without a pause on approvals.

If the Government of Alberta and the AUC are unwilling to immediately end the pause, I respectfully request that you continue to fully process new and existing excluded applications without issuing any approvals until after the pause period (Option 3 in your announcement).

Thank you for considering my request.

Sincerely,

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Dear AUC members and Alberta Government officials.

Please find attached my response to the announced pause on renewable energy approvals in Alberta.

I know that my letter comes after the deadline of August 18th 2023, but I hope you still will and can consider my letter.



**Please**, do the right thing and let ordinary Alberta citizens benefit from renewable energy possibilities.

With best regards,  
Dear AUC Members,

I am writing as a concerned Albertan resident in response to your stakeholder feedback request, dated

August 3, 2023<sup>1</sup>. I respectfully request that the AUC keeps the pause for renewable energy projects

greater than 1MW. I believe the decision to pause renewable projects of greater than 1MW<sup>2</sup> is long

overdue. Alberta is the solar powerhouse of Canada, and we need to develop a strategy to maintain our competitive edge.

I understand that you have a number of concerns you are seeking to address:

- Evaluate where solar and wind energy can be allowed without large installations of line infrastructure. Using existing line capacity and give preferential treatment to projects that benefit

Alberta citizens and Alberta companies. 10,000 x 0.5 MW systems are more reliable and more social responsible than 100 x 50 MW systems.

- With respect to land reclamation concerns, please note that solar sites will remain viable well past the end of life of the original panels, and this will significantly reduce land reclamation needs.

Additionally, The Government of Alberta already has reclamation [Guidelines for Renewable Energy Operations](#) which address this matter.

- With respect to end of life concerns for renewable energy infrastructure disposal, the Alberta Recycling Management Authority (ARMA) is already piloting reuse and recycle programs for solar PV. Given that the majority of solar being installed today will be in operation for well over 25 years, ARMA is really out ahead on this matter.

- With respect to land use concerns, such as food security, wetland preservation and wildlife conservation, Solar Alberta has already created highly relevant Solar Siting Recommendations: <https://solaralberta.ca/solar-siting-recommendations/>. I believe you could review and adopt protocols such as these without a pause on approvals.

- What has been left out of all considerations and plannings is the benefit to ordinary Alberta citizens. Large solar production capacities exist on normal roof space, waste & non-productive land of private properties (acreages) and farming operations. Most of thus locations have already

line connections that could take the produced power with no or minimal requirements for new lines.

- All more then 1MW projects are from non-Alberta or non-Canadian companies and give very little or no reward to Alberta and Canadian citizens and they have required new line connections

and infrastructure that every normal power user must pay for.



• Do the right thing and allow more than own-usage production on private properties, waste- and non-productive lands with a fair pay to any over production. Let the ordinary citizen benefit from the solar energy.  
Thank you for considering my request.

Sincerely,

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Dear AUC Members,

I am writing as a concerned Albertan resident in response to your stakeholder feedback request, dated August 3, 2023<sup>1</sup>. **I respectfully request that the AUC end the pause and immediately recommence approvals for renewable energy projects greater than 1MW.** I believe the decision to pause renewable projects of greater than 1MW<sup>2</sup> is unnecessary, will threaten thousands of jobs, will increase electricity costs for all ratepayers, will stifle billions of dollars in investment, and will slow efforts to address climate change. Alberta is the solar powerhouse of Canada, and we need to maintain our competitive edge.

I understand that you have a number of concerns you are seeking to address<sup>3</sup>:

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- With respect to **end of life** concerns for renewable energy infrastructure disposal, the Alberta Recycling Management Authority (ARMA) is already piloting reuse and recycle programs for solar PV. Given that the majority of solar being installed today will be in operation for well over 25 years, ARMA is really out ahead on this matter.
- With respect to **land use** concerns, such as food security, wetland preservation and wildlife conservation, Solar Alberta has already created highly relevant Solar Siting Recommendations: <https://solaralberta.ca/solar-siting-recommendations/>. I believe you could review and adopt protocols such as these without a pause on approvals.

If the Government of Alberta and the AUC are unwilling to immediately end the pause, I respectfully request that you continue to fully process new and existing excluded applications without issuing any approvals until after the pause period (Option 3 in your announcement).

Thank you for considering my request.

Sincerely,

Dear AUC Members,

I am writing as a concerned Albertan in response to your stakeholder feedback request, dated August 3, 2023<sup>1</sup>. I respectfully request that the AUC end the pause and immediately recommence approvals for renewable energy projects greater than 1MW. I believe the decision to pause renewable projects of greater than 1MW<sup>2</sup> is unnecessary, will threaten thousands of jobs, will increase electricity costs for all ratepayers, and will stifle tens of billions of dollars in investment. Alberta is the solar powerhouse of Canada, and we need to maintain our competitive edge.

I understand that you have a number of concerns you are seeking to address<sup>3</sup>:

With respect to land reclamation concerns, please note that solar sites will remain viable well past the end of life of the original panels, and this will significantly reduce land reclamation needs. Additionally, The Government of Alberta already has reclamation Guidelines for Renewable Energy Operations which address this matter.

With respect to end of life concerns for renewable energy infrastructure disposal, the Alberta Recycling Management Authority (ARMA) is already piloting reuse and recycle programs for solar PV. Given that the majority of solar being installed today will be in operation for well over 25 years, ARMA is really out ahead on this matter.

With respect to land use concerns, such as food security, wetland preservation and wildlife conservation, Solar Alberta has already created highly relevant Solar Siting Recommendations: <https://solaralberta.ca/solar-siting-recommendations/>.

I believe you could review and adopt protocols such as these without a pause on approvals.

I am disappointed that all the options were for some amount of pause because it really isn't needed. However, if the Government of Alberta and the AUC are unwilling to immediately end the pause, I respectfully request that you continue to fully process new and existing excluded applications without issuing any approvals until after the pause period (Option 3 in your announcement).

Thank you for considering my request.

Sincerely,

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Dear AUC Members,

I am writing as a concerned Albertan resident in response to your stakeholder feedback request, dated August 3, 2023<sup>1</sup>. **I respectfully request that the AUC end the pause and immediately recommence approvals for renewable energy projects greater than 1MW.** I believe the



decision to pause renewable projects of greater than 1MW<sup>2</sup> is unnecessary, will threaten thousands of jobs, will increase electricity costs for all ratepayers, will stifle billions of dollars in investment, and will slow efforts to address climate change. Alberta is the solar powerhouse of Canada, and we need to maintain our competitive edge.

I understand that you have a number of concerns you are seeking to address<sup>3</sup>:

- With respect to **land reclamation** concerns, please note that solar sites will remain viable well past the end of life of the original panels, and this will significantly reduce land reclamation needs. Additionally, The Government of Alberta already has reclamation [Guidelines for Renewable Energy Operations](#) which address this matter.
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- With respect to **land use** concerns, such as food security, wetland preservation and wildlife conservation, Solar Alberta has already created highly relevant Solar Siting Recommendations: <https://solaralberta.ca/solar-siting-recommendations/>. I believe you could review and adopt protocols such as these without a pause on approvals.

If the Government of Alberta and the AUC are unwilling to immediately end the pause, I respectfully request that you continue to fully process new and existing excluded applications without issuing any approvals until after the pause period (Option 3 in your announcement).

Thank you for considering my request.

Sincerely,

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Dear Alberta Utility members

Please.... Let's do something good today for Alberta that we can be proud about!. Let's do it for our environment, for Alberta consumers, for the flourishing of innovative business and for their thousands of workers . Let's not follow the lemmings in the UCP off the cliff on this one.

Please Stop this moratorium on wind and solar projects.

I am writing as a very concerned Albertan resident in response to your stakeholder feedback request, dated August 3, 2023<sup>1</sup>. **I add my name to those who respectfully request that the AUC end the pause and immediately recommence approvals for renewable energy projects greater than 1MW.**



I believe the decision to pause renewable projects of greater than 1MW<sup>2</sup> is unnecessary, will threaten thousands of jobs, will increase electricity costs for all ratepayers, will stifle billions of dollars in investment, and will slow efforts to address climate change. Alberta is the solar powerhouse of Canada, and we need to maintain our competitive edge, not devastate it.

I understand that you have concerns you are seeking to address;

- With respect to **land reclamation** concerns, please note that solar sites will remain viable well past the end of life of the original panels, and this will significantly reduce land reclamation needs. Additionally, The Government of Alberta already has reclamation [Guidelines for Renewable Energy Operations](#) which address this matter.
- With respect to **end of life** concerns for renewable energy infrastructure disposal, the Alberta Recycling Management Authority (ARMA) is already piloting reuse and recycle programs for solar PV. Given that the majority of solar being installed today will be in operation for well over 25 years, ARMA is really out ahead on this matter.
- With respect to **land use** concerns, such as food security, wetland preservation and wildlife conservation, Solar Alberta has already created highly relevant Solar Siting Recommendations: <https://solaralberta.ca/solar-siting-recommendations/>. I believe you could review and adopt protocols such as these without a pause on approvals

Thank you for asking for feedback. Please now act.

Sincerely,

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August 18, 2023

Dear Alberta Utility Commission Members,

In response to your stakeholder feedback request dated August 3, 2023 I request that the AUC cancel the moratorium on approvals for renewable energy projects greater than 1 MW.

I am a member of the Edmonton Chapter of the Council of Canadians. We have been working on environmental issues for many years and are very concerned about the danger of the climate crisis.

The Alberta Environmental Network is a nonprofit society that has been in operation since 1987.

The decision to halt approvals for renewable electricity projects of greater than 1 MW is unprecedented. This action will threaten thousands of jobs, increase electricity costs for all ratepayers, stifle billions of dollars in investment, and slow efforts to address climate change. Halting approvals does not serve



Albertans. Rather,

we need to continue approvals and launch an open, transparent and meaningful review of these projects.

I understand that you have a number of concerns you are seeking to address

● With respect to land reclamation concerns, please note that solar sites will remain viable well past the end

of life of the original panels, and this will significantly reduce land reclamation needs.

Additionally, The

Government of Alberta already has reclamation Guidelines for Renewable Energy

Operations which

address this matter.

● With respect to end of life concerns for renewable energy infrastructure disposal, the Alberta Recycling

Management Authority (ARMA) is already piloting reuse and recycle programs for solar PV.

Given that the

majority of solar being installed today will be in operation for well over 25 years, ARMA is

really out ahead

on this matter.

● With respect to land use concerns, such as food security, wetland preservation and wildlife conservation,

Solar Alberta has already created highly relevant Solar Siting Recommendations. I believe you could

review and adopt protocols such as these without a pause on approvals.

If the Government of Alberta and the AUC are unwilling to immediately end the

moratorium, we respectfully

request that you continue to fully process new and existing excluded applications without issuing any approvals

until after the pause period (Option 3 in your announcement).

Thank you for considering my request.

Finally, as well as contributing to economic diversification, these projects help us decarbonize our electrical system, thus helping combat climate change

Sincerely

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Dear AUC Members,

I am writing as a concerned Albertan resident in response to your stakeholder feedback request, dated August 3, 2023<sup>1</sup>. **I respectfully request that the AUC end the pause and immediately recommence approvals for renewable energy projects greater than 1MW.** I believe the decision to pause renewable projects of greater than 1MW<sup>2</sup> is unnecessary, will threaten thousands of jobs, will increase electricity costs for all ratepayers, will stifle billions of dollars in



investment, and will slow efforts to address climate change. Alberta is the solar powerhouse of Canada, and we need to maintain our competitive edge.

I understand that you have a number of concerns you are seeking to address<sup>3</sup>:

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If the Government of Alberta and the AUC are unwilling to immediately end the pause, I respectfully request that you continue to fully process new and existing excluded applications without issuing any approvals until after the pause period (Option 3 in your announcement).

Thank you for considering my request.

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# AUC

Alberta Utilities Commission

reclamation needs. Additionally, The Government of Alberta already has reclamation [Guidelines for Renewable Energy Operations](#) which address this matter.

- With respect to **end of life** concerns for renewable energy infrastructure disposal, the Alberta Recycling Management Authority (ARMA) is already piloting reuse and recycle programs for solar PV. Given that the majority of solar being installed today will be in operation for well over 25 years, ARMA is really out ahead on this matter.
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If the Government of Alberta and the AUC are unwilling to immediately end the pause, I respectfully request that you continue to fully process new and existing excluded applications without issuing any approvals until after the pause period (Option 3 in your announcement).

Thank you for considering my request.

Sincerely,

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Please see attached feedback letter.

We write in response to the AUC seeking stakeholder feedback on implementing the approval pause as required by the Regulation.

Solar Krafte, with a singular focus on grid parity solar power generation, is a leading developer of utility-scale solar farms in Alberta. To date, we have developed the following solar farms in Alberta that are either operational or under construction:

- 74.9 MW Prairie Sunlight I Solar Project (operational);
- 24.5 MW Prairie Sunlight II Solar Project (operational);
- 22 MW Prairie Sunlight III Solar Project (operational);
- 40.5 MW Strathmore Solar Farm (operational);
- 41.4 MW Wrentham Solar Project (operational); and
- 29.5 MW Spring Coulee Solar Project (under construction).

Solar Krafte, a 100% Canadian owned corporation, partners with world leading owners of renewable generation and we were directly responsible for global generation fleet owners RWE and Brookfield Renewables' entry into the Alberta market. We were also directly responsible for Alberta's largest generation fleet owner, Capital Power, entering the solar generation market in Alberta.

The idea that solar is a new and mysterious technology, that needs to be stopped, so that it can be studied, is ridiculous. Solar Krafte met with AESO planners, and other key Alberta stakeholders, over 5 years ago, and explained transparently exactly what to expect with the inevitable energy transition. This transition was inevitable, simply because the levelized cost of solar generated electricity was quickly becoming lower than the cost of thermal generation. This was a global commercial phenomenon, and as



a 100% Canadian company, we had participated in other advanced markets for a decade before coming home to Alberta. By harvesting sunshine, this new, better technology was simply replacing the old. The question of: "Would you pay more for electricity, just so that you can burn chunks of our planet?" had only one, obvious answer. No one can credibly claim that they could not see this transition coming, or that there are uncertainties around solar with so many 1000s of solar farms operating for decades globally now. This is a terrible, global embarrassment for Alberta. The least that the AUC, and other stakeholders can do now is to mitigate the damage to Alberta's economy, and reputation.

Solar Krafte is clearly disappointed in the approval pause, as we have additional utility-scale solar farm projects under development, with new, leading international partners evaluating first investments into the Alberta market. With one of these projects, our 450-megawatt Rainier project, we are on the eve of submitting our power plant approval and substation permit and license applications. To ready this project for submission, it has taken significant investment, in terms of time and capital. Notwithstanding the approval pause, our intention is to submit the applications this month. Accordingly, we request that the AUC adopt the approval hold only approach to mitigate any harm the approval pause may cause the project.

Respectfully,

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Dear AUC Members,

I am writing as a concerned Albertan resident in response to your stakeholder feedback request, dated August 3, 2023<sup>1</sup>. **I respectfully request that the AUC end the pause and immediately recommence approvals for renewable energy projects greater than 1MW.** I believe the decision to pause renewable projects of greater than 1MW<sup>2</sup> is unnecessary, will threaten thousands of jobs, will increase electricity costs for all ratepayers, will stifle billions of dollars in investment, and will slow efforts to address climate change. Alberta is the solar powerhouse of Canada, and we need to maintain our competitive edge.

I understand that you have a number of concerns you are seeking to address<sup>3</sup>:

- With respect to **land reclamation** concerns, please note that solar sites will remain viable well past the end of life of the original panels, and this will significantly reduce land reclamation needs. Additionally, The Government of Alberta already has reclamation [Guidelines for Renewable Energy Operations](#) which address this matter.
- With respect to **end of life** concerns for renewable energy infrastructure disposal, the Alberta Recycling Management Authority (ARMA) is already piloting reuse and recycle programs for solar PV. Given that the majority of solar being installed today will be in operation for well over 25 years, ARMA is really out ahead on this matter.
- With respect to **land use** concerns, such as food security, wetland preservation and wildlife conservation, Solar Alberta has already created highly relevant Solar Siting Recommendations: <https://solaralberta.ca/solar-siting-recommendations/>. I believe you could review and adopt protocols such as these without a pause on approvals.



If the Government of Alberta and the AUC are unwilling to immediately end the pause, I respectfully request that you continue to fully process new and existing excluded applications without issuing any approvals until after the pause period (Option 3 in your announcement).

Thank you for considering my request.

Sincerely,

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## END THE PAUSE ON RENEWABLES APPROVALS IN ALBERTA NOW

Dear AUC Members,

I am writing as a concerned Albertan resident in response to your stakeholder feedback request, dated August 3, 2023<sup>1</sup>. **I respectfully request that the AUC end the pause and immediately recommence approvals for renewable energy projects greater than 1MW.** I believe the decision to pause renewable projects of greater than 1MW<sup>2</sup> is unnecessary, will threaten thousands of jobs, will increase electricity costs for all ratepayers, will stifle billions of dollars in investment, and will slow efforts to address climate change. Alberta is the solar powerhouse of Canada, and we need to maintain our competitive edge.

I understand that you have a number of concerns you are seeking to address<sup>3</sup>:

- With respect to **land reclamation** concerns, please note that solar sites will remain viable well past the end of life of the original panels, and this will significantly reduce land reclamation needs. Additionally, The Government of Alberta already has reclamation [Guidelines for Renewable Energy Operations](#) which address this matter.
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- With respect to **land use** concerns, such as food security, wetland preservation and wildlife conservation, Solar Alberta has already created highly relevant Solar Siting Recommendations: <https://solaralberta.ca/solar-siting-recommendations/>. I believe you could review and adopt protocols such as these without a pause on approvals.

If the Government of Alberta and the AUC are unwilling to immediately end the pause, I respectfully request that you continue to fully process new and existing excluded applications without issuing any approvals until after the pause period (Option 3 in your announcement).

Thank you for considering my request.

Sincerely,

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Dear AUC Members,

I am writing as a concerned Albertan resident in response to your stakeholder feedback request, dated August 3, 2023<sup>1</sup>. **I respectfully request that the AUC end the pause and immediately recommence approvals for renewable energy projects greater than 1MW.** I believe the decision to pause renewable projects of greater than 1MW<sup>2</sup> is unnecessary, will threaten thousands of jobs, will increase electricity costs for all ratepayers, will stifle billions of dollars in investment, and will slow efforts to address climate change. Alberta is the solar powerhouse of Canada, and we need to maintain our competitive edge.

Personally I have listened to several interviews on this topic, and in one interview with Energy Economist Dr Andrew Leach, he explained that increases in electrical costs have happened to occur at the same time that there has been a big increase in renewable energy in the province, but that the correlation has been coincidental, and renewable energy increases have NOT caused price increases to consumers. I can verify this for as a consumer of electricity, I have opted to purchase 50% of my power from renewable sources for the past year and a half. This has been completely affordable for me, and I get by on a lower middle class income. I believe that increasing the amount of renewable energy produced in Alberta can only help keep costs down, as more energy will be in the market. The emphasis should rather be on building out transmission lines to connect AB, SK and BC so we can export or import energy as needed and increase our energy resilience. I am also deeply concerned about the escalating climate crisis; my cousin was evacuated a couple of days ago from her home in Yellowknife. The fires we are seeing now are unlike anything we have experienced in the past. We must expedite our transition towards renewables with all haste, as scientists are now calling for a drastic decrease in carbon emissions by 2030 to stave off catastrophic effects from climate change. I am extremely worried about our future.

I understand that you have a number of concerns you are seeking to address<sup>3</sup>:

- With respect to **land reclamation** concerns, please note that solar sites will remain viable well past the end of life of the original panels, and this will significantly reduce land reclamation needs. Additionally, The Government of Alberta already has reclamation [Guidelines for Renewable Energy Operations](#) which address this matter.
- With respect to **end of life** concerns for renewable energy infrastructure disposal, the Alberta Recycling Management Authority (ARMA) is already piloting reuse and recycle programs for solar PV. Given that the majority of solar being installed today will be in operation for well over 25 years, ARMA is really out ahead on this matter.



- With respect to **land use** concerns, such as food security, wetland preservation and wildlife conservation, Solar Alberta has already created highly relevant Solar Siting Recommendations: <https://solaralberta.ca/solar-siting-recommendations/>. I believe you could review and adopt protocols such as these without a pause on approvals.

If the Government of Alberta and the AUC are unwilling to immediately end the pause, I respectfully request that you continue to fully process new and existing excluded applications without issuing any approvals until after the pause period (Option 3 in your announcement).

Thank you for considering my request.

Sincerely,

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Dear AUC Members,

I am writing as a concerned Albertan resident in response to your stakeholder feedback request, dated August 3, 2023<sup>1</sup>. **I respectfully request that the AUC end the pause and immediately recommence approvals for renewable energy projects greater than 1MW.** This summer has clearly highlighted the climate change issue and I firmly believe that the decision to pause renewable projects, projects that reduce our impact on the environment, makes no sense as they will slow efforts to address climate change. Further, I understand that this decision to pause renewable projects of greater than 1MW<sup>2</sup> is unnecessary, will threaten thousands of jobs, will increase electricity costs for all ratepayers and will stifle billions of dollars in investment, . Alberta is the solar powerhouse of Canada, and we need to maintain our competitive edge.

I understand that you have a number of concerns you are seeking to address<sup>3</sup>:

- With respect to **land reclamation** concerns, please note that solar sites will remain viable well past the end of life of the original panels, and this will significantly reduce land reclamation needs. Additionally, The Government of Alberta already has reclamation [Guidelines for Renewable Energy Operations](#) which address this matter.
- With respect to **end of life** concerns for renewable energy infrastructure disposal, the Alberta Recycling Management Authority (ARMA) is already piloting reuse and recycle programs for solar PV. Given that the majority of solar being installed today will be in operation for well over 25 years, ARMA is really out ahead on this matter.
- With respect to **land use** concerns, such as food security, wetland preservation and wildlife conservation, Solar Alberta has already created highly relevant Solar Siting Recommendations: <https://solaralberta.ca/solar-siting-recommendations/>. I believe you could review and adopt protocols such as these without a pause on approvals.



If the Government of Alberta and the AUC are unwilling to immediately end the pause, I respectfully request that you continue to fully process new and existing excluded applications without issuing any approvals until after the pause period (Option 3 in your announcement).

Thank you for considering my request.

Sincerely,

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To whom it may concern.

As a concerned Albertan resident and in response to your [stakeholder feedback request, dated August 3, 2023](#), I would like to add my voice to those who are calling for a removal of the pause on renewables approvals. I am concerned that this pause will delay and likely deter many large-scale renewable investments in our province. As the energy power house of Canada we need to push forward with renewable deployments or risk being left behind as other provinces and even countries move forward with this technology.

Also the way this pause was enacted is very disappointing and concerning. From my current understanding the pause was directed by the Alberta Government without any consultation with the renewable industry or the public. I am concerned that this kind of action, taken in such isolation, will send a signal to the global renewable industry that Alberta is not open for business and is not interested in an investments in renewables. This kind of message will put our future as an energy leader at risk. I understand the pause is being implemented at the direction of the Government of Alberta and I urge the AUC to push back on this pause and do everything in its power to convince the Government to end this pause immediately. Should this fail, I would request the AUC to adopt the **Approvals Only Hold** option for the required approvals pause as this will hopefully allow industry and investors to continue to plan and move forward on renewables investments while meeting the Governments requirements of pausing approvals.

Thank you.

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Dear AUC Members,

I am writing as a concerned Albertan resident in response to your stakeholder feedback request, dated August 3, 2023<sup>1</sup>. **I respectfully request that the AUC end the pause and immediately recommence approvals for renewable energy projects greater than 1MW.** I believe the decision to pause renewable projects of greater than 1MW<sup>2</sup> is unnecessary, will threaten thousands of jobs, will increase electricity costs for all ratepayers, will stifle billions of dollars in investment, and will slow efforts to address climate change. Alberta is the solar powerhouse of Canada, and we need to maintain our competitive edge.

I understand that you have a number of concerns you are seeking to address<sup>3</sup>:



- With respect to **land reclamation** concerns, please note that solar sites will remain viable well past the end of life of the original panels, and this will significantly reduce land reclamation needs. Additionally, The Government of Alberta already has reclamation [Guidelines for Renewable Energy Operations](#) which address this matter.
- With respect to **end of life** concerns for renewable energy infrastructure disposal, the Alberta Recycling Management Authority (ARMA) is already piloting reuse and recycle programs for solar PV. Given that the majority of solar being installed today will be in operation for well over 25 years, ARMA is really out ahead on this matter.
- With respect to **land use** concerns, such as food security, wetland preservation and wildlife conservation, Solar Alberta has already created highly relevant Solar Siting Recommendations: <https://solaralberta.ca/solar-siting-recommendations/>. I believe you could review and adopt protocols such as these without a pause on approvals.

If the Government of Alberta and the AUC are unwilling to immediately end the pause, I respectfully request that you continue to fully process new and existing excluded applications without issuing any approvals until after the pause period (Option 3 in your announcement).

Thank you for considering my request.

Sincerely,

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Dear AUC Members,

I am reaching out to you today in response to your stakeholder feedback request, dated August 3, 2023<sup>1</sup>. I am an Alberta resident, born and raised and **I respectfully request that the AUC end the pause and immediately recommence approvals for renewable energy projects greater than 1MW**. The decision to pause renewable projects of greater than 1MW<sup>2</sup> is unnecessary. It will threaten thousands of jobs, increase electricity costs, stifle investments, and slow necessary efforts to mitigate climate change. Alberta has incredible solar resources, and we need to act on this advantage.

I understand that you have a number of concerns you are seeking to address<sup>3</sup>:

- With respect to **land reclamation** concerns, solar sites will remain viable past the original panels' end of life, and this will significantly reduce land reclamation needs. The Government of Alberta already has reclamation [Guidelines for Renewable Energy Operations](#) that address this matter.
- With respect to **end of life** concerns for renewable energy infrastructure disposal, the Alberta Recycling Management Authority (ARMA) is piloting reuse and recycle programs



# AUC

Alberta Utilities Commission

for solar PV. Given that the majority of solar being installed today will be in operation for well over 25 years, ARMA is really out ahead on this matter.

- With respect to **land use** concerns, such as food security, wetland preservation and wildlife conservation, Solar Alberta has already created highly relevant Solar Siting Recommendations: <https://solaralberta.ca/solar-siting-recommendations/>. I believe you could review and adopt protocols such as these without pause on approvals.

If the Government of Alberta and the AUC are unwilling to immediately end the pause, I respectfully request that you continue to fully process new and existing excluded applications without issuing any approvals until after the pause period (Option 3 in your announcement).

Thank you for taking the time to read and consider my request.

Sincerely,

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Dear AUC Members,

I am writing as a concerned Albertan resident in response to your stakeholder feedback request, dated August 3, 2023<sup>1</sup>. **I respectfully request that the AUC end the pause and immediately recommence approvals for renewable energy projects greater than 1MW.** I believe the decision to pause renewable projects of greater than 1MW<sup>2</sup> is unnecessary, will threaten thousands of jobs, will increase electricity costs for all ratepayers, will stifle billions of dollars in investment, and will slow efforts to address climate change. Alberta is the solar powerhouse of Canada, and we need to maintain our competitive edge.

I understand that you have a number of concerns you are seeking to address<sup>3</sup>:

- With respect to **land reclamation** concerns, please note that solar sites will remain viable well past the end of life of the original panels, and this will significantly reduce land reclamation needs. Additionally, The Government of Alberta already has reclamation [Guidelines for Renewable Energy Operations](#) which address this matter.
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If the Government of Alberta and the AUC are unwilling to immediately end the pause, I respectfully request that you continue to fully process new and existing excluded applications without issuing any approvals until after the pause period (Option 3 in your announcement).

This pause is already demonstrating to the global community that Alberta can not be depended upon to be an active ally in the energy transition necessary to help my kids have a more hopeful future. Ideological politics can not be allowed to further undermine our planet's future. Please do everything within your power to reverse this moratorium and make us proud of Alberta's contribution to making a more hopeful tomorrow.

Thank you for considering my request.

Sincerely,

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Dear AUC Members,

I am writing as a concerned Albertan resident in response to your stakeholder feedback request, dated August 3, 2023<sup>1</sup>. **I respectfully request that the AUC end the pause and immediately recommence approvals for renewable energy projects greater than 1MW.** I believe the decision to pause renewable projects of greater than 1MW<sup>2</sup> is unnecessary, will threaten thousands of jobs, will increase electricity costs for all ratepayers, will stifle billions of dollars in investment, and will slow efforts to address climate change. Alberta is the solar powerhouse of Canada, and we need to maintain our competitive edge.

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If the Government of Alberta and the AUC are unwilling to immediately end the pause, I respectfully request that you continue to fully process new and existing excluded applications without issuing any approvals until after the pause period (Option 3 in your announcement).

Thank you for considering my request.

Sincerely,

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Dear AUC Members,

I am writing as a concerned Albertan resident in response to your stakeholder feedback request, dated August 3, 2023<sup>1</sup>. **I respectfully request that the AUC end the pause and immediately recommence approvals for renewable energy projects greater than 1MW.** I believe the decision to pause renewable projects of greater than 1MW<sup>2</sup> is unnecessary, will threaten thousands of jobs, will increase electricity costs for all ratepayers, will stifle billions of dollars in investment, and will slow efforts to address climate change. Alberta is the solar powerhouse of Canada, and we need to maintain our competitive edge.

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If the Government of Alberta and the AUC are unwilling to immediately end the pause, I respectfully request that you continue to fully process new and existing excluded applications without issuing any approvals until after the pause period (Option 3 in your announcement).

Thank you for considering my request.

Sincerely,

Dear AUC Members,

I am writing as a concerned Albertan resident in response to your stakeholder feedback request, dated August 3, 2023<sup>1</sup>. **I respectfully request that the AUC end the pause and immediately recommence approvals for renewable energy projects greater than 1MW.** I believe the decision to pause renewable projects of greater than 1MW<sup>2</sup> is unnecessary, will threaten thousands of jobs, will increase electricity costs for all ratepayers, will stifle billions of dollars in investment, and will slow efforts to address climate change. Alberta is the solar powerhouse of Canada, and we need to maintain our competitive edge.

I understand that you have a number of concerns you are seeking to address<sup>3</sup>:

- With respect to **land reclamation** concerns, please note that solar sites will remain viable well past the end of life of the original panels, and this will significantly reduce land reclamation needs. Additionally, The Government of Alberta already has reclamation [Guidelines for Renewable Energy Operations](#) which address this matter.
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If the Government of Alberta and the AUC are unwilling to immediately end the pause, I respectfully request that you continue to fully process new and existing excluded applications without issuing any approvals until after the pause period (Option 3 in your announcement).

Thank you for considering my request.

Sincerely,

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Dear AUC Members,

I am writing as a concerned Albertan resident in response to your stakeholder feedback request, dated August 3, 2023<sup>1</sup>. **I respectfully request that the AUC end the pause and immediately recommence approvals for renewable energy projects greater than 1MW.** I believe the



decision to pause renewable projects of greater than 1MW<sup>2</sup> is unnecessary, will threaten thousands of jobs, will increase electricity costs for all ratepayers, will stifle billions of dollars in investment, and will slow efforts to address climate change. Alberta is the solar powerhouse of Canada, and we need to maintain our competitive edge.

I understand that you have a number of concerns you are seeking to address<sup>3</sup>:

- With respect to **land reclamation** concerns, please note that solar sites will remain viable well past the end of life of the original panels, and this will significantly reduce land reclamation needs. Additionally, The Government of Alberta already has reclamation [Guidelines for Renewable Energy Operations](#) which address this matter.
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If the Government of Alberta and the AUC are unwilling to immediately end the pause, I respectfully request that you continue to fully process new and existing excluded applications without issuing any approvals until after the pause period (Option 3 in your announcement).

Thank you for considering my request.

Sincerely,

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August 18, 2023

Dear AUC Members,

I am writing as a concerned Albertan resident in response to your stakeholder feedback request, dated August 3, 2023(1). **I respectfully request that the AUC end the pause and immediately recommence approvals for renewable energy projects greater than 1MW.** I believe the decision to pause renewable projects of greater than 1MW(2) is unnecessary, will threaten thousands of jobs, will increase electricity costs for all ratepayers, will stifle billions of dollars in investment, and will slow efforts to address climate change. Alberta is the solar powerhouse of Canada, and we need to maintain our competitive edge.

I understand that you have several concerns you are seeking to address(3):

- With respect to **land reclamation** concerns, please note that solar sites will remain viable well past the end of life of the original panels, and this will significantly reduce land reclamation



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needs. Additionally, The Government of Alberta already has reclamation [Guidelines for Renewable Energy Operations](#) that address this matter.

- With respect to **end-of-life** concerns for renewable energy infrastructure disposal, the Alberta Recycling Management Authority (ARMA) is already piloting reuse and recycle programs for solar PV. Given that the majority of solar being installed today will be in operation for well over 25 years, ARMA is out ahead on this matter.
- With respect to **land use** concerns, such as food security, wetland preservation, and wildlife conservation, Solar Alberta has already created highly relevant Solar Siting Recommendations: <https://solaralberta.ca/solar-siting-recommendations/>. I believe you could review and adopt protocols such as these without a pause on approvals.

If the Government of Alberta and the AUC are unwilling to immediately end the pause, I respectfully request that you continue to fully process new and existing excluded applications without issuing any approvals until after the pause period (Option 3 in your announcement).

Thank you for considering my request.

Sincerely,

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Dear AUC Members,

I am writing as a concerned Albertan resident in response to your stakeholder feedback request, dated August 3, 2023<sup>1</sup>. **I respectfully request that the AUC end the pause and immediately recommence approvals for renewable energy projects greater than 1MW.** I believe the decision to pause renewable projects of greater than 1MW<sup>2</sup> is unnecessary, will threaten thousands of jobs, will increase electricity costs for all ratepayers, will stifle billions of dollars in investment, and will slow efforts to address climate change. Alberta is the solar powerhouse of Canada, and we need to maintain our competitive edge.

I understand that you have a number of concerns you are seeking to address<sup>3</sup>:

- With respect to **land reclamation** concerns, please note that solar sites will remain viable well past the end of life of the original panels, and this will significantly reduce land reclamation needs. Additionally, The Government of Alberta already has reclamation [Guidelines for Renewable Energy Operations](#) which address this matter.
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If the Government of Alberta and the AUC are unwilling to immediately end the pause, I respectfully request that you continue to fully process new and existing excluded applications without issuing any approvals until after the pause period (Option 3 in your announcement).

Thank you for considering my request.

Sincerely,

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Dear AUC Members,

I am writing as a concerned Albertan resident in response to your stakeholder feedback request, dated August 3, 2023<sup>1</sup>. **I respectfully request that the AUC end the pause and immediately recommence approvals for renewable energy projects greater than 1MW.** I believe the decision to pause renewable projects of greater than 1MW<sup>2</sup> is unnecessary, will threaten thousands of jobs, will increase electricity costs for all ratepayers, will stifle billions of dollars in investment, and will slow efforts to address climate change. Alberta is the solar powerhouse of Canada, and we need to maintain our competitive edge.

I understand that you have a number of concerns you are seeking to address<sup>3</sup>:

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If the Government of Alberta and the AUC are unwilling to immediately end the pause, I respectfully request that you continue to fully process new and existing excluded applications without issuing any approvals until after the pause period (Option 3 in your announcement).

Thank you for considering my request.

Sincerely,

Dear AUC Members,

I am writing as a concerned Albertan resident in response to your stakeholder feedback request, dated August 3, 2023<sup>1</sup>. **I respectfully request that the AUC end the pause and immediately recommence approvals for renewable energy projects greater than 1MW.** I believe the decision to pause renewable projects of greater than 1MW<sup>2</sup> is unnecessary, will threaten thousands of jobs, will increase electricity costs for all ratepayers, will stifle billions of dollars in investment, and will slow efforts to address climate change. Alberta is the solar powerhouse of Canada, and we need to maintain our competitive edge.

I understand that you have a number of concerns you are seeking to address<sup>3</sup>:

- With respect to **land reclamation** concerns, please note that solar sites will remain viable well past the end of life of the original panels, and this will significantly reduce land reclamation needs. Additionally, The Government of Alberta already has reclamation [Guidelines for Renewable Energy Operations](#) which address this matter.
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If the Government of Alberta and the AUC are unwilling to immediately end the pause, I respectfully request that you continue to fully process new and existing excluded applications without issuing any approvals until after the pause period (Option 3 in your announcement).

Thank you for considering my request.

Sincerely,

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Hello,

Attached please find a letter from Northland Power commenting on the preferred option.

Regards,



**Re: AUC to launch inquiry, implement pause on approvals for new renewable electricity generation**

Northland Power Inc. is a global developer, owner and operator of clean and green power infrastructure. Our facilities produce electricity from clean-burning natural gas and renewable resources such as wind, and solar. We have a long track record of 35 years in business, established in 1987, we are one of Canada's first independent power producers. Northland owns or has an economic interest in 3 GW of operating capacity and a significant inventory of development opportunities encompassing approximately 20 GW of potential capacity, including one of the largest renewable development portfolios in Alberta.

Alberta's open electricity market has become a global leader in renewable and storage investment

that benefits our economy and provides affordable electricity to Albertans. To remain an investment leader, the province should minimize project uncertainty while addressing the issues raised by the Inquiry. To do so, Northland believes that the "Approval hold only" option presented by the Commission is the most efficient alternative for renewable generation projects affected by the 7-month pause. Specifically, Northland supports the alternative wherein the Commission continues to fully process applications without issuing approvals until after the pause period.

Northland will work proactively with stakeholders and the Commission to respond to the five considerations that the AUC will review during the Inquiry.

Sincerely,

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Dear AUC Members,

I am writing as a concerned Albertan resident in response to your stakeholder feedback request, dated August 3, 2023<sup>1</sup>. **I respectfully request that the AUC end the pause and immediately recommence approvals for renewable energy projects greater than 1MW.** I believe the decision to pause renewable projects of greater than 1MW<sup>2</sup> is unnecessary, will threaten thousands of jobs, will increase electricity costs for all ratepayers, will stifle billions of dollars in investment, and will slow efforts to address climate change. Alberta is the solar powerhouse of Canada, and we need to maintain our competitive edge.

I understand that you have a number of concerns you are seeking to address<sup>3</sup>:

- With respect to **land reclamation** concerns, please note that solar sites will remain viable well past the end of life of the original panels, and this will significantly reduce land reclamation needs. Additionally, The Government of Alberta already has reclamation [Guidelines for Renewable Energy Operations](#) which address this matter.
- With respect to **end of life** concerns for renewable energy infrastructure disposal, the Alberta Recycling Management Authority (ARMA) is already piloting reuse and recycle programs for





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solar PV. Given that the majority of solar being installed today will be in operation for well over 25 years, ARMA is really out ahead on this matter.

- With respect to **land use** concerns, such as food security, wetland preservation and wildlife conservation, Solar Alberta has already created highly relevant Solar Siting Recommendations: <https://solaralberta.ca/solar-siting-recommendations/>. I believe you could review and adopt protocols such as these without a pause on approvals.

If the Government of Alberta and the AUC are unwilling to immediately end the pause, I respectfully request that you continue to fully process new and existing excluded applications without issuing any approvals until after the pause period (Option 3 in your announcement).

Thank you for considering my request.

Sincerely,

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Dear AUC Members,

I am writing as a concerned Albertan resident in response to your stakeholder feedback request, dated August 3, 2023<sup>1</sup>. **I respectfully request that the AUC end the pause and immediately recommence approvals for renewable energy projects greater than 1MW.** I believe the decision to pause renewable projects of greater than 1MW<sup>2</sup> is unnecessary, will threaten thousands of jobs, will increase electricity costs for all ratepayers, will stifle billions of dollars in investment, and will slow efforts to address climate change. Alberta is the solar powerhouse of Canada, and we need to maintain our competitive edge.

I understand that you have a number of concerns you are seeking to address<sup>3</sup>:

- With respect to **land reclamation** concerns, please note that solar sites will remain viable well past the end of life of the original panels, and this will significantly reduce land reclamation needs. Additionally, The Government of Alberta already has reclamation [Guidelines for Renewable Energy Operations](#) which address this matter.
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If the Government of Alberta and the AUC are unwilling to immediately end the pause, I respectfully request that you continue to fully process new and existing excluded applications without issuing any approvals until after the pause period (Option 3 in your announcement).

Thank you for considering my request.

Sincerely,

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Dear AUC Members,

I am writing as a concerned Calgary, Alberta resident in response to your stakeholder feedback request, dated August 3, 2023. **I respectfully request that the AUC end the pause and immediately recommence approvals for renewable energy projects greater than 1MW.** I believe the decision to pause renewable projects of greater than 1MW is shortsighted, will threaten thousands of jobs, will increase electricity costs for all ratepayers, will stifle billions of dollars in investment and discredit Alberta as a reasonable jurisdiction to invest, and will lead to further acceleration of climate change. Alberta is the solar powerhouse of Canada, and we need to maintain our competitive edge.

I understand that you have a number of concerns you are seeking to address:

- The land reclamation concerns are a non-concern, especially Alberta is happy to approve coal mines, strip mining, mass forestry, pipelines, and oil wells. Solar sites remain viable during and well past the end of life of the original panels, and this will significantly reduce land reclamation needs. Additionally, The Government of Alberta already has reclamation [Guidelines for Renewable Energy Operations](#) which address this matter.
- With respect to **end of life** concerns for renewable energy infrastructure disposal, the Alberta Recycling Management Authority (ARMA) is already piloting reuse and recycle programs for solar PV. Given that the majority of solar being installed today will be in operation for well over 25 years, ARMA is really out ahead on this matter.
- I only share the AUC's concerns with respect to land use. Prime farmland which is not dependent on high levels of irrigation should not be use for solar projects, nor should any land currently holding a pristine ecosystem. There is a massive body of land within the province that is suitable for solar. Solar Alberta has created an excellent set of siting recommendations that could be adopted immediately: <https://solaralberta.ca/solar-siting-recommendations/>.



If the Government of Alberta and the AUC are unwilling to immediately end the pause, I respectfully request that you continue to fully process new and existing excluded applications without issuing any approvals until after the pause period (Option 3 in your announcement).

Thank you for considering my request.

Sincerely,

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Dear AUC Members,

I am writing as a concerned Albertan resident in response to your stakeholder feedback request, dated August 3, 2023<sup>1</sup>. **I respectfully request that the AUC end the pause and immediately recommence approvals for renewable energy projects greater than 1MW.** I believe the decision to pause renewable projects of greater than 1MW<sup>2</sup> is unnecessary, will threaten thousands of jobs, will increase electricity costs for all ratepayers, will stifle billions of dollars in investment, and will slow efforts to address climate change. Alberta is the solar powerhouse of Canada, and we need to maintain our competitive edge.

I understand that you have a number of concerns you are seeking to address<sup>3</sup>:

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If the Government of Alberta and the AUC are unwilling to immediately end the pause, I respectfully request that you continue to fully process new and existing excluded applications without issuing any approvals until after the pause period (Option 3 in your announcement).

Thank you for considering my request.

Sincerely,

Dear AUC Members,

I am writing as a concerned Albertan resident in response to your stakeholder feedback request, dated August 3, 2023<sup>1</sup>. **I respectfully request that the AUC end the pause and immediately recommence approvals for renewable energy projects greater than 1MW.** I believe the decision to pause renewable projects of greater than 1MW<sup>2</sup> is unnecessary, will threaten thousands of jobs, will increase electricity costs for all ratepayers, will stifle billions of dollars in investment, and will slow efforts to address climate change. Alberta was on course to become a renewable energy leader in Canada, and we should be trying to maintain this position not undermining it.

I understand that you have a number of concerns you are seeking to address<sup>3</sup>:

- With respect to **land reclamation** concerns, please note that solar sites will remain viable well past the end of life of the original panels, and this will significantly reduce land reclamation needs. Additionally, The Government of Alberta already has reclamation [Guidelines for Renewable Energy Operations](#) which address this matter.
- With respect to **end of life** concerns for renewable energy infrastructure disposal, the Alberta Recycling Management Authority (ARMA) is already piloting reuse and recycle programs for solar PV. Given that the majority of solar being installed today will be in operation for well over 25 years, ARMA is really out ahead on this matter.
- With respect to **land use** concerns, such as food security, wetland preservation and wildlife conservation, Solar Alberta has already created highly relevant Solar Siting Recommendations: <https://solaralberta.ca/solar-siting-recommendations/>. I believe you could review and adopt protocols such as these without a pause on approvals.

If the Government of Alberta and the AUC are unwilling to immediately end the pause, I respectfully request that you continue to fully process new and existing excluded applications without issuing any approvals until after the pause period (Option 3 in your announcement).

Thank you for considering my request.

Sincerely,

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Dear AUC Members,

I am writing as a concerned Albertan resident in response to your stakeholder feedback request, dated August 3, 2023<sup>1</sup>. **I respectfully request that the AUC end the pause and immediately**

**recommence approvals for renewable energy projects greater than 1MW.** I believe the decision to pause renewable projects of greater than 1MW<sup>2</sup> is unnecessary, will threaten thousands of jobs, will increase electricity costs for all ratepayers, will stifle billions of dollars in investment, and will slow efforts to address climate change. Alberta is the solar powerhouse of Canada, and we need to maintain our competitive edge.

I understand that you have a number of concerns you are seeking to address<sup>3</sup>:

- With respect to **land reclamation** concerns, please note that solar sites will remain viable well past the end of life of the original panels, and this will significantly reduce land reclamation needs. Additionally, The Government of Alberta already has reclamation [Guidelines for Renewable Energy Operations](#) which address this matter.
- With respect to **end of life** concerns for renewable energy infrastructure disposal, the Alberta Recycling Management Authority (ARMA) is already piloting reuse and recycle programs for solar PV. Given that the majority of solar being installed today will be in operation for well over 25 years, ARMA is really out ahead on this matter.
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If the Government of Alberta and the AUC are unwilling to immediately end the pause, I respectfully request that you continue to fully process new and existing excluded applications without issuing any approvals until after the pause period (Option 3 in your announcement).

This pause is already demonstrating to the global community that Alberta can not be depended upon to be an active ally in the energy transition necessary to help my kids have a more hopeful future. Ideological politics can not be allowed to further undermine our planet's future. Please do everything within your power to reverse this moratorium and make us proud of Alberta's contribution to making a more hopeful tomorrow.

Thank you for considering my request.

Sincerely,

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Dear AUC Members,

I am writing as a concerned Albertan resident. **I respectfully request that the AUC end the pause and immediately recommence approvals for renewable energy projects greater than 1MW.** I believe the decision to halt renewable projects has been hastily made, without



consultation with industry, and will put jobs in peril at a time when many Albertans are struggling financially.

Concerns regarding renewal energy projects need to be addressed in consultation with industry, so that this valuable sector of our economy can continue to thrive.

If the Government of Alberta and the AUC are unwilling to immediately end the pause, I respectfully request that you continue to fully process new and existing excluded applications without issuing any approvals until after the pause period (Option 3 in your announcement).

Thank you for considering my request.

Sincerely,

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Dear AUC Members,

I am writing as a concerned Albertan resident in response to your stakeholder feedback request, dated August 3, 2023<sup>1</sup>. **I respectfully request that the AUC end the pause and immediately recommence approvals for renewable energy projects greater than 1MW**. I believe the decision to pause renewable projects of greater than 1MW<sup>2</sup> is unnecessary, will threaten thousands of jobs, will increase electricity costs for all ratepayers, will stifle billions of dollars in investment, and will slow efforts to address climate change. Alberta is the solar powerhouse of Canada, and we need to maintain our competitive edge.

I understand that you have a number of concerns you are seeking to address<sup>3</sup>:

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- With respect to **end of life** concerns for renewable energy infrastructure disposal, the Alberta Recycling Management Authority (ARMA) is already piloting reuse and recycle programs for solar PV. Given that the majority of solar being installed today will be in operation for well over 25 years, ARMA is really out ahead on this matter.
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If the Government of Alberta and the AUC are unwilling to immediately end the pause, I respectfully request that you continue to fully process new and existing excluded applications without issuing any approvals until after the pause period (Option 3 in your announcement).

Thank you for considering my request.

Sincerely,

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Dear AUC Members,

I am writing as a concerned Albertan resident in response to your stakeholder feedback request, dated August 3, 2023<sup>1</sup>. **I respectfully request that the AUC end the pause and immediately recommence approvals for renewable energy projects greater than 1 megaWatt.** I believe the decision to pause renewable projects of greater than 1MW<sup>2</sup> is unnecessary, will threaten thousands of jobs, will increase electricity costs for all ratepayers, will stifle billions of dollars in investment, and will slow efforts to address climate change. Alberta is the solar powerhouse of Canada, and we need to maintain our competitive edge.

I understand that you have a number of concerns you are seeking to address<sup>3</sup>:

- With respect to **land reclamation** concerns, please note that solar sites will remain viable well past the end of life of the original panels, and this will significantly reduce land reclamation needs. Additionally, The Government of Alberta already has reclamation [Guidelines for Renewable Energy Operations](#) which address this matter.
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If the Government of Alberta and the AUC are unwilling to immediately end the pause, I respectfully request that you continue to fully process new and existing excluded applications without issuing any approvals until after the pause period (Option 3 in your announcement).

Thank you for considering my request.

Sincerely,

To whom it may concern.

I am seriously disappointed on the decision to halt approvals for renewable energy projects over the next six months.

As an Albertan I think we have an opportunity to improve the carbon footprint of our electrical grid, producing a more stable, environmentally friendly source of electricity. With the 6 month hold we are risking future investment and the employment of the individual workers who have staked their careers on solar and wind energy.

In an time marked by inflation, one measure that can help is the reduction of cost per kwh of electricity produced, the cost of natural gas and coal cannot compete with the cost of photovoltaic electricity or wind turbine electricity. This creates a risk of an uncompetitive market that scares away investment in our province while making life more expensive for everyday Albertans like myself.

I plead with you to withdraw the moratorium on renewable energy projects.

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Dear AUC Members,

I am writing as a concerned Albertan resident. **I respectfully request that the AUC end the pause and immediately recommence approvals for renewable energy projects greater than 1MW.** I believe the decision to pause renewable projects of greater than 1MW is unnecessary, will threaten thousands of jobs, will increase electricity costs for all ratepayers, will stifle billions of dollars in investment, and will slow efforts to address climate change. Alberta is the solar powerhouse of Canada, and we need to maintain our competitive edge.

I understand that you have a number of concerns you are seeking to address:

- With respect to **land reclamation** concerns, please note that solar sites will remain viable well past the end of life of the original panels, and this will significantly reduce land reclamation needs. Additionally, The Government of Alberta already has reclamation [Guidelines for Renewable Energy Operations](#) which address this matter.
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If the Government of Alberta and the AUC are unwilling to immediately end the pause, I respectfully request that you continue to fully process new and existing excluded applications without issuing any approvals until after the pause period (Option 3 in your announcement). Thank you for considering my request.

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