

May 15, 2023

Sent via email

Dear Joan Yu:

RE: Bulletin 2023-01 Stage 2 of round 2 consultation for potential changes to AUC Rule 012: Noise Control

Please find below AltaLink's feedback on the discussion questions in Bulletin 2023-01.

1. **Please comment on the definition of suburban and urban receptors proposed for Table 1 of Rule 012.**

- **Is it reasonable to add two columns to Table 1 of Rule 012 for suburban and urban receptors?**

Yes, as stated in AltaLink's response to Question 1 in Bulletin 2022-12, AltaLink believes that the two proposed columns provide the appropriate granularity for suburban and urban receptors.

- **Has the Commission selected appropriate dwelling densities for suburban and urban receptors?**

Yes, the Commission's analysis of health guidelines and current metropolitan census data appears to provide a good basis for the proposed dwelling densities.

2. **Please comment on the basic sound levels for suburban and urban receptors proposed for Table 1 of Rule 012.**

- **In particular, the Commission requests that noise consultants and others who may represent members of the public comment on the basic sound levels for suburban and urban receptors from the perspective of suburban and urban residents.**

AltaLink provides no comments and defers to noise consultants.

3. **Please suggest changes to subsection 2.5(2) of Rule 012.**

- **In particular, please specify an appropriate development milestone for a facility that has been predicted or measured to be compliant with Rule 012. After this milestone, owners/residents of a new dwelling should be aware that a new facility will be located nearby and the permissible sound level at the new dwelling will be greater of the modelled cumulative sound level at the start of the dwelling construction, or the permissible sound level as determined in Section 2.1 of Rule 012.**

AltaLink agrees with ATCO's recommendation to revise Rule 012 Subsection 2.5(2), however, AltaLink submits that the ordering of major equipment related to the project is the appropriate development milestone because it determines the overall schedule of the project. This milestone can be verified with purchase orders and may be more precise than "substantially started construction", which may lead to different interpretations.

4. **Please comment on whether Rule 012 should include tonality evaluation for all audible frequencies.**

AltaLink submits that the current Rule 012 provision for low frequency noise is adequate for transmission facilities.

5. **If Rule 012 should include tonality evaluation for all audible frequencies, please comment on the circumstances where it would be appropriate to evaluate tonal noise.**

- **Should tonality evaluation be required in all comprehensive sound level surveys ordered by the commission?**

AltaLink defers comments to noise consultants. AltaLink does not have the expertise to perform comprehensive sound level surveys and uses noise consultants for the surveys.

- **Should tonality evaluation only be required in comprehensive sound level surveys arising from complaints?**

AltaLink defers comments to noise consultants. AltaLink does not have the expertise to perform comprehensive sound level surveys and uses noise consultants for the surveys.

6. **Please comment on potential unintended consequences if Rule 012 were to require tonality evaluation for all audible frequencies.**

It may result in higher project costs because of an increase in the cost to conduct the comprehensive sound level surveys.

7. **If the Commission were to require tonality evaluation for all audible frequencies, should any changes be made to the current criteria for low frequency noise?**

- **In particular, should the dBC minus dBA element of the low frequency noise evaluation be eliminated?**

AltaLink submits that the dBC minus dBA element for low frequency noise should remain for transmission facilities even if tonality evaluation is required.

Sincerely,

Emily Denstedt

Emily Denstedt (May 15, 2023 16:28 MDT)

Emily Denstedt
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