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May 15, 2023

Alberta Utilities Commission  
Eau Claire Tower  
1400, 600 Third Avenue S.W.  
Calgary, Alberta T2P 0G5

**Attention: Ms. Joan Yu**

Dear Ms. Yu:

**Re: EPCOR Distribution & Transmission (“EDTI”)  
Response to Bulletin 2023-01: Stage 2 of round 2 consultation for potential changes to  
AUC Rule 012: Noise Control**

1. EDTI submits this letter in response to Bulletin 2023-01 issued by the Alberta Utilities Commission (“AUC” or the “Commission”) on April 25, 2023, which sought stakeholder comments and feedback on the Commission’s potential changes to Rule 012. EDTI appreciates the opportunity to provide feedback on the Revised Rule, and provides the following comments below.

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

2. With respect to the definition of suburban and urban receptors, EDTI seeks clarity on how to calculate the dwelling density in suburban or urban areas. As per the current Table 1 in Rule 012, the Basic Sound Level (BSL) falls under three categories: 1-8 dwellings, 9-160 dwellings and above 160 dwellings. Since the changes to Table 1 add two additional categories, 161 to 400

dwellings and 401-1000 dwellings, EDTI seeks clarity on the methodology to utilize to accurately count the number of dwellings in a quarter section of land. EDTI is of the view that it may be difficult to accurately count the number of dwellings within the two additional categories when the numbers are sourced externally or when they are manually counted.

3. EDTI suggests that a standard formula or process for calculating the dwelling density for areas surrounding impacted facilities be developed and included as part of Rule 012.

***Question 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.***

4. In addition to Rule 012, EDTI is also required to adhere to the noise limits prescribed in the City of Edmonton's Community Standards Bylaw (Bylaw 14600). According to this Bylaw, EDTI is required not to cause or permit any sound exceeding 75 dBA during daytime (which is defined in the Bylaw as being between 7 a.m. and 10 p.m.), and 60 dBA during nighttime (which is defined as before 7 a.m. or after 10 p.m.). As a result, the sound output at EDTI facilities is limited to the sound limits outlined in Bylaw 14600 in addition to the calculated Permissible Sound Level (PSL) per requirement 2.1(7) in Rule 012. For example, if the calculated PSL under Rule 012 for one of EDTI's sites was 70 dBA, EDTI would still limit the sound level at the site to 60 dBA in order to be compliant with Bylaw 14600.

***Question 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.***

5. EDTI suggests that an appropriate development milestone for a facility that has been predicted or measured to be compliant with Rule 012 would be when a facility application (FA) is filed for the construction of said facility. EDTI is concerned that allowing for subsequent noise impact assessments (NIA) following the filing of an FA could result in alterations to the project scope. For example, further noise mitigation measures may be required if the permissible sound

level is determined to be lower than what was originally calculated. Scope changes such as this could result in increased project costs and construction delays, as well as additional regulatory steps should amendment applications be required.

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

6. It is EDTI's position that Rule 012 should not be amended to include a tonality evaluation for all audible frequencies. The frequency of the sound at the majority of EDTI's substations is approximately 120 Hertz (Hz) and does not typically exhibit a low frequency tonal component. As a result, this requirement for tonality evaluation would bear additional time and cost for EDTI for no tangible benefit.

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

7. If Rule 012 is to include a tonality evaluation for all audible frequencies, EDTI recommends that transformers be exempt from the requirements as tonality is not typically a concern created by this piece of equipment.

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

8. Requiring tonality evaluations for all audible frequencies would require additional work to be undertaken to complete an NIA for an applicable facility. This could result in prolonged project schedules and increased project costs due to the additional time it would take for an NIA to be completed without tonality evaluations.

***Question 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?***

9. EDTI has no position on whether any changes should be made to the current criteria for low frequency noise as the sound level at the majority of EDTI's substations is approximately 120 Hz and does not typically exhibit a low frequency tonal component. Consequently, requiring a tonality evaluation for all audible frequencies would have little impact to EDTI.

Sincerely,

*[Electronically Submitted]*

Ryan McNeil  
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