

From: [Jeff Moe](#)
To: [Joan Yu](#)
Subject: FW: Patching Feedback - AUC Bulletin 2022-08 - Initiation of stakeholder consultation process for AUC Rule 012: Noise Control
Date: Friday, July 8, 2022 4:27:30 PM
Attachments: [Bulletin 2022-08.cleaned.pdf](#)

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Jeff Moe | Account Manager

D: [403.730.7299](tel:403.730.7299) | C: [403.990.3025](tel:403.990.3025)

[SoundComply](#): The quick and easy way to assess your facility's noise-related risk.

----- Original message -----

From: Jeff Moe <jmoe@patchingassociates.com>

Date: 2022-07-08 4:08 p.m. (GMT-07:00)

To:

Cc: Justin Caskey <jcaskey@patchingassociates.com>, Mac Kunz <mkunz@patchingassociates.com>, Sheying Sun <ssun@patchingassociates.com>

Subject: Patching Feedback - AUC Bulletin 2022-08 - Initiation of stakeholder consultation process for AUC Rule 012: Noise Control

Hi Joan,

I hope all is well, please see our comments and feedback below.

- Topic 1.1: Noise Receptor, Point 3.
 - This change could create precedence or introduce risk for existing operators with existing licenses. We recommend coordinating with the AER so as not to create multiple critical receptors for facilities with shared jurisdictions. In addition, questions of encroachment and "grandfathering" should be addressed in principal so as to avoid exponential, or un-achievable noise mitigation costs for situations with existing plans or licenses.
- Topic 1.3: New Noise Impact Assessment Flowchart
 - We support this concept and have seen success in other jurisdictions. It creates opportunities for automation and increased efficiency.
 - The approach can introduce compliance/complaint risk in a few areas. Specifically, we recommend additional detail to require that Sound Power Levels are verified using field

measurements or other methodologies following acoustical engineering methodologies. Consider requiring Sound Power levels derived from equipment manufactures to be verified by a 3rd party, this is particularly important in emerging energy use cases (Eg. Crypto mining).

- Sound emissions can vary over time and are sensitive to operating conditions of the equipment. Because of this we often see manufactures sound data mis-used. Suggest adding language to ensure the flowchart reflects representative operating conditions. The 3dB "safety factor" built into the flow chart may not be enough.
- The current flowchart does not mention cumulative impacts, this is becoming more of a consideration, especially in future where new energy uses and sources may blur the lines between AUC, AER, or other extractive industries (Eg. Geothermal). Considering cumulative impacts is required in almost all modern jurisdictions and for consultation, recommend increasing safety factor or adding requirement to consider other emission sources.
- Without adding considerations above we recommend increasing the "safety factor" to 10dB.
- Topic 1.4: Submission and retention of NIA records.
 - 3.4 (2)b. We recommend clarity on the requirement to submit documentation even in the case of a flowchart NIA. We recommend still requiring proponents file a copy of the flowchart NIA. Rationale:
 - Cost is low, as automation can be leveraged to keep costs low.
 - Demonstrates that noise was considered at the design stage, thus the level of consideration should be public record.
 - Provides valuable (essential) information to use for cumulative impacts for other facilities and activities in an area (Eg. Other AUC, AER, aggregate extraction, etc.). Notwithstanding the specific sound level will not be available, the flowchart can still be useful information for regional development, especially in the distributed power generation development case.
 - Flowchart can inform the level of due diligence performed to assess noise risk
- a. Mention of a summary NIA but then the use of this term drops off in topic 1.4 only describing flowchart versus a full NIA
- b. Recommend clear distinction between the levels of assessment
 - i. Flowchart should represent a decision for the level of assessment based on risk.
 - ii. Flowchart, Summary NIA versus full NIA should be clearly defined.

Sincerely,



Jeff Moe | VP, Business Development
D: 403.730.7299 | C: 403.990.3025

[SoundComply](#): The quick and easy way to assess your facility's noise-related risk.

From: Crystal Carstens <Crystal.Carstens@auc.ab.ca>

Sent: Friday, June 3, 2022 1:54 PM

Subject: AUC Bulletin 2022-08 - Initiation of stakeholder consultation process for AUC Rule 012: Noise Control

Hello,

The AUC issued Bulletin 2022-08 “Initiation of stakeholder consultation process for AUC Rule 012: Noise Control” and associated documents (i.e., Overview of potential changes to Rule 012, Rule 012 revision matrix and Blackline Rule 012) on the AUC’s Rule 012 consultation webpage.

The AUC values stakeholder input regarding the proposed changes and is seeking comments and feedback by July 8, 2022. The bulletin is attached to the email for your convenience.

Thank you.

Crystal Carstens

Administrative Assistant

www.auc.ab.ca



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