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July 8, 2022

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

1. EDTI submits this letter in response to Bulletin 2022-08 issued by the Alberta Utilities Commission (“AUC” or the “Commission”) on June 3, 2022, which sought stakeholder comments and feedback on the Commission’s potential changes to Rule 012 (“Revised Rule”). EDTI appreciates the opportunity to provide feedback on the Revised Rule, and provides the following comments below.

***Comment 1 – Exempt Facilities***

2. EDTI requests confirmation that an exempt facility, as used in Rule 012, refers to facilities set out in Rule 007 Section 4.1 Exemptions.

***Comment 2 – No Noise-Emitting Equipment Added or Altered***

3. Section 3.1(2) proposes:

- (a) When a facility is exempt from the requirement to file a Rule 007 application or is eligible to file a checklist application under Rule 007, the facility must still comply with Rule 012 permissible sound levels. In these

cases, a proponent may complete an Appendix 9 – Noise impact assessment flowchart to determine if a noise impact assessment is required.

- (b) Preparation of a noise impact assessment may be avoided in cases where the noise impact from a facility is expected to be minimal. For an exempt facility or a facility eligible to file a checklist application, the noise impact assessment flowchart provides objective criteria for determining if noise impacts are expected to be minimal.
  - (i) If these criteria are satisfied, then further assessment is not required.
  - (ii) If these criteria are not satisfied, then the proponent must complete a noise impact assessment.

[...]

4. To understand the proposed changes, EDTI requests confirmation whether a Noise Impact Assessment (“NIA”) Flowchart is required to be completed, if no noise-emitting equipment is proposed to be added, replaced or modified at an existing transmission facility. As drafted, the NIA Flowchart appears to be optional.

***Comment 3 – NIA Flowchart Dwelling***

5. EDTI notes that the NIA Flowchart refers to “dwelling” rather than “noise receptor” and seeks confirmation that the use of “dwelling” was intentional.

6. EDTI looks forward to further participating in consultations regarding potential changes to AUC Rule 012 and to providing feedback on proposed revisions. If you have any questions or concerns regarding the comments above, please contact the undersigned.

Sincerely,

*[Electronically Submitted]*

Ryan McNeil  
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