

February 16, 2023

Sent via email

Dear Joan Yu:

RE: Bulletin 2022-12 Further consultation for potential changes to AUC Rule 012: Noise Control

Please find below AltaLink's feedback on the discussion questions in Bulletin 2022-12.

1. **Do you believe changes are required to Rule 012 to specifically address PSLs for urban environments in light of Decision 27276-D02-2022 or otherwise? Please explain.**

It is AltaLink's belief that AUC Rule 012 needs to be expanded to further refine population/dwelling density classifications as defined in Table 1 in light of Decision 27276-D02-2022. The current classification of >160 is not granular enough to capture the noise levels of urban environments (for example, 170 is in the same classification as 300).

2. **If you believe changes are required to Rule 012 to specifically address PSLs for urban environments:**

- 2.1 **Please discuss whether the existing provisions in Rule 012 for assessing ambient sound levels and the use of A2 adjustments are adequate to determine appropriate PSLs for urban environments. Please include a discussion of the pros and cons associated with using the existing provisions to determine PSLs for urban environments.**

Table 1 of Rule 012 needs to be expanded with higher PSLs for urban environments. AltaLink has no experience with A2 adjustments and has no comment on its adequacy. AltaLink recommends higher PSLs to provide a more accurate representation of urban areas similar to those described in Table 6.1 of Health Canada's Guidance for Evaluating Human Health Impacts in Environmental Assessment: Noise¹

Pros: Keeps the existing application simple. Current Rule 012 PSLs match the AER Directive 038 PSLs.

Cons: Current classifications force avoidable restrictions in urban environments that have much noisier ambient levels, and may result in unnecessary capital expenditures in time and material to mitigate facility noise to meet lower PSLs.

- 2.2. **Please comment on how to define an urban receptor in Rule 012.**

Add subsequent population/dwelling density classification(s) for urban environments.

- 2.3. **Please provide any recommendations for determining appropriate PSLs for urban environments, including any specific considerations for industrial versus residential areas. Please include a discussion of the pros and cons associated with the recommended method to determine PSLs for urban environments.**

¹ Available from: https://publications.gc.ca/collections/collection_2017/sc-hc/H129-54-3-2017-eng.pdf

AltaLink does not have the expertise to propose an upper limit of the existing third population/dwelling density classification (>160) should subsequent classification(s) be created. Some municipalities have their own noise bylaws and they should be considered in conjunction with AUC Rule 012. Add wording to Rule 012 to clarify governing rule if conflict exists between Rule 012 and municipal bylaw. Please see the discussion in 2.1 above.

2.4. Please comment on any other factors that should be considered in the context of establishing PSLs for urban environments.

Consider commercial, industrial, or recreational sources not regulated by Rule 012 or AER Directive 038 within an urban environment.

3. **Do you believe that changes are required to update the sections of Rule 012 that address PSLs for new dwellings (i.e., sections 2.3, 2.4 and 2.5 and the definition of new dwelling in Appendix 1 – Glossary) in light of Decision 27444-D01-2022 or otherwise? Please explain.**

AltaLink believes that the existing Rule 012 section adequately address PSLs for new dwellings in light of Decision 27444-D01-2022.

4. **If you believe changes are required to update the sections of Rule 012 that address PSLs for new dwellings:**

Refer to response 3 above.

Sincerely,

Carol Akbar

Carol Akbar (Feb 16, 2023 16:05 MST)

Carol Akbar
VP, Financial Integrity & Op Services