



2000 – 10423 101 St NW, Edmonton, AB
T5H 0E8 Canada
epcor.com

February 17, 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 2022-12: Initiation of stakeholder consultation process for
AUC Rule 012: Noise Control**

1. EDTI submits this letter in response to Bulletin 2022-12 issued by the Alberta Utilities Commission (“AUC” or the “Commission”) on December 16, 2022, 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 - 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.

2. EDTI believes that changes to Rule 012 are not required to specifically address permissible sound levels (PSL) for urban environments. EDTI believes that the existing provision in Rule 012, subsection 1.4(3)¹, is sufficient to allow the Commission to take action in the rare cases when the PSLs in Rule 012 are insufficient to satisfy stakeholders in the area surrounding a site. Additionally, Rule 012 includes a mechanism to open investigations for stakeholders that raise concerns with licensees of power plants and substations.

¹ Subsection 1.4(3) gives the Commission discretion to ‘dispense with, vary, or supplement all or any part of these rules if it is satisfied that the circumstances require it.’

3. EDTI's transmission infrastructure is often located in densely populated, urban areas where there is little space in and around the site to implement noise mitigation. If the PSLs for urban areas were to be reduced, it would be difficult to implement noise mitigation measures without further impacts to local stakeholders. Such impacts would include increased capital costs to implement the noise mitigation measures (e.g., sound walls and transformer sound enclosures) as well as visual impacts from the resulting construction and noise mitigation infrastructure. In addition, installing further noise mitigation measures at transmission infrastructure located in urban areas may only be feasible with the purchase of additional land. Land acquisitions would result in further increased capital costs and delays in installing noise mitigation measures.

4. The power plant situated within the City of Grande Prairie, referenced in Decision 27276-D02-2022, is housed on a larger plot of land than the land on which EDTI typically places its infrastructure. The Grande Prairie power plant is somewhat uniquely placed in an urban area in relation to which there is more space available at that location for implementing noise mitigation measures if PSLs were to be reduced. Consequently, there would be less of an impact to the public as a result of the mitigation measures.

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

- ***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.***
- ***Please comment on how to define an urban receptor in Rule 012.***
- ***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.***
- ***Please comment on any other factors that should be considered in the context of establishing PSLs for urban environments.***

5. EDTI does not believe changes to Rule 012 are required to address PSLs in urban environments.

Question 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.

6. EDTI does not believe that changes are required to update sections of Rule 012 that address PSLs for new dwellings. It is EDTI's position that the new dwelling rule is clear and does not need any revisions. The existing requirements in Rule 012 for new dwellings sufficiently ensure that increased capital costs are incurred in the public interest.

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

- ***Please specify which paragraphs or sections of Rule 012 should be updated and provide any recommended updates. Please include a discussion of the pros and cons associated with the existing provisions and any recommended updates.***
- ***Please explain how you believe PSLs for new dwellings should be established. In particular, please describe recommendations to provide enhanced clarity to the existing new dwelling provisions in Rule 012.***
- ***Please comment on any other factors that should be considered in the context of establishing PSLs for new dwellings.***

7. EDTI does not believe changes to Rule 012 are required to address PSLs for new dwellings.

Sincerely,

[Electronically Submitted]

Ryan McNeil
Senior Manager, Regulatory & Business Planning
EPCOR Distribution & Transmission Inc.
Phone: 780-412-3710