

From: [Michel](#)
To: [Joan Yu](#)
Subject: Re: AUC Rule 12 Revision
Date: Thursday, February 2, 2023 2:14:16 PM
Attachments: [1644236689941018_1701839001.png](#)
[1.png](#)

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Hi Joan,

Here is a follow up to my previous email.

Decision 27276-D02-2022 is about a new 666KW Power Plant (two 333kW Generators) located very close to residences in GP. The closest residence is 42m from the generators. The companies involved proceeded without completing a power plant application and noise impact assessment. **Recommendation 1:** Rule 12 should state that all projects should complete a Noise Impact Assessment.

After mitigation was installed the nighttime PSL was met, but they still mention high pitch noise. Rule 12 only penalizes low pitch noise (5dB PSL reduction), not high pitch noise. The power plant meets the PSL, but has a high tonal component that is extremely harmful. **Recommendation 2:** High pitch tonal noise should not be allowed, or it should reduce the PSL by 5dB.

Recommendation 3: All projects should require a post-construction noise survey and NIA to confirm compliance. Manufacturer's data is not accurate most of the time. The turbines installed on the GP Power Plant are an example. The specs have a much lower noise level than measured.

Decision 27444-D01-2022: Substation began operating in 1969, transformers were added in 1970, 1979, 1992 and 2003, and the original transformer was removed in 2014. The substation owner "concluded that because No. 28 Substation began operating in 1969, while the townhouse complex was constructed in or about 1982, the New Dwelling Rule of Rule 012: Noise Control was applicable and that, as a result, noise levels were in compliance with Rule 012 and no further relief or action was required. ENMAX notified the AUC of the noise complaint, the results of its assessment and its interpretation of the New Dwelling Rule."

Recommendation 4: Add to "The New Dwelling Rule" in Section 2.3 of Rule 12: (4) Every time a facility is modified a new NIA must be performed and the facility should have to comply with the PSL at all residences located within 1.5km.

Recommendation 5: the maximum nighttime theoretical ambient noise level should be 45dBA and the maximum nighttime PSL should be 50dBA. In both decisions the residents were complaining of nighttime noise level over 50dBA. If a proponent wants to confirm that the ambient is higher than 45dBA, Class A2 adjustment methodology should be followed.

Let me know if you need anything.

Regards,

Michel

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---- On Mon, 30 Jan 2023 19:23:28 -0700 **Michel <mfreitas@motiveacoustics.com>**
wrote ---

Hi Joan,

My team and I have read the Decisions listed on Bulletin 2011-12 and specific to Decision 27444-D01-2022, the substation had transformers added in 1970, 1979, 1992 and 2003, and the original transformer was removed in 2014.

Shouldn't we perform a new NIA and post-construction CSL every time a facility is modified by adding, replacing or removing equipment?

My teams interpretation is that we should follow Example 4 table on page 66 and 67 of Rule 12, but when a facility is modified a new noise study should be performed and if there are new dwellings, the PSL should be at the most impacted dwellings.

Please let me know your thoughts.

Thanks,

Michel

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