

Date: May 23, 2025

To: AUC

From: Brenda Best

Re: Rule 007 Blackline comments

Thank you for the opportunity to comment on the draft of Rule 007. Continual adjustments to Rule 007 are necessary due to the increasing rate of change in the industry.

	Reference	Topic	Recommendation
1.	PDF p 38 SP15	Limit of yellow glare – 30 minutes per day and 30 hours per year	For runway and flight paths, there should be a difference between controlled and uncontrolled aerodromes. At uncontrolled airports, pilots use visual siting to locate other aircraft in the area. I believe the field of view of +/- 50 degrees should be zero minute limit for an uncontrolled airport. There are much less risks at controlled airports within this field of view. Also, the FOV be +/- 50 degrees (total 100 degrees FOV). And the others would need to be adjusted also. Helicopter flight path glare assessments should consider 360 degree approaches unless there are valid reasons for a change.
2.	PDF p 47 – SP29	A cost estimate prepared by a third party which describes the estimated costs of reclaiming the proposed project.	It should be prepared by an <u>independent</u> third party. It should also be based on current year dollars.
3.	PDF p 47 – SP29	Confirmation that the operator will have sufficient funds at the project end of life to meet its	How is this “confirmation” to be provided? A projected cash flow? A projected timeline for letter of credit (or other credit facility) increases? A letter from an accountant? Is AUC looking for a confirmation or a funding projection showing there will be sufficient security for reclamation. Please describe exactly what is expected.

		reclamation security plan.	
4.	PDF p 47 – SP29	How the amount of the reclamation security will be calculated.	Calculations should be shown in today's dollars and future dollars using a reasonable inflation and interest rate. Show the annual cash contributions and increases in non-cash security. See sample spreadsheet in Table CC.
5.	PDF p 47 – SP29	The estimated salvage value of projects components...	This estimate should be prepared by an independent third party.
6.	PDF p 48 – SP36	Summarize the PIP...	AUC should consider developing some templates that are required to be used by developers to reduce time spent by all parties trying to locate and interpret data. For example, the PIP activities could be summarized chronologically as shown in Table AA, or another format.
7.	PDF p 49 – SP37	If the glare assessment includes runways, flight paths and/or highways as receptors, the applicant must confirm it has provided a copy of the glare assessment to ....	It should also be confirmed by the developer that the glare assessment provided to the parties for consideration was the version included in the AUC application.
8.	PDF p 52	Glare - Confirm that the changes do not cause additional solar glare at route receptors (e.g., highways, major roadways and railways) and any registered and known	Residences and other developments should be included also.

		unregistered aerodromes.	
9.	PDF p 164	Local Authority definition	Consider including “airport authority”
10.	PDF p 165	Power plant project boundary definition: The limits of a power plant project defined using all quarter sections of land on which permanent project infrastructure is sited (above and below ground), including collector lines. If any portion of a project is sited within a quarter section, that quarter section should be included in the project boundary.	What if the power plant project occupies a parcel of land within a quarter section (i.e. the quarter section is broken in several parcels, each with its own land title). Does the project boundary go to the edge of the parcel boundary or the quarter section boundary? It needs clarification.
11.	PDF page 181 – 6.1	Face to face meetings removed	Many seniors need this type of consultation. Is it possible to make sure it is indicated that it is acceptable to be requested by Persons?
12.	PDF p 183 - PIP	Information requirements throughout this rule require a list of contact information for all persons who were contacted as part of the PIP	This wording can cause confusion. Some developers do not include some landowners within the notification area for unknown reasons. Consider making it mandatory for minimum inclusion of all landowners within the minimum distances for notification and consultation (Tables A1-1 and A1-2) in this list.  Instead of “contacted”, consider using “required to be notified or consulted”.

13.	PDF p 183 - PIP	Occupants and residents who are not landowners	About 1/3 of Alberta households are renters. When a project is in an urban area, it makes it even more important to make sure the occupants are notified or consulted as required. Consider outlining steps that should be taken by developers to ensure occupants and residents are notified. This is a weak area in many applications.
14.	PDF p 183	Table A1-3 Requirements for contact information	<p>This table is used by AUC to mail/email notifications regarding the application. However, it serves an additional purpose of making sure everyone was notified that should have been. Many hours are spent by AUC representatives, the developer, Persons affected by the project and legal representatives doing various tasks related to this data. For example:</p> <ul style="list-style-type: none"> <li>• trying to match contact names up to the maps provided by the developer</li> <li>• draft, and respond to, information requests when it appears affected Persons are missing from the contact list</li> <li>• addressing Persons' concerns that they were not notified of the project by clearly identifying how they were notified</li> <li>• matching Persons to noise and glare receptors</li> </ul> <p>Developers can reduce their overall costs by including the information in the additional columns shown in Table BB below. It will also allow more efficient use of AUC resources.</p>
15.	PDF p 192 - 6		<p>The AEPA-FWS referral report is not a requirement for a First Nation reserve. However, AUC states that it expects applicants to demonstrate that the project <u>complies</u> with the standards and best management practices in the Wildlife Directive.</p> <p>Power projects in urban boundaries are also exempt from providing an AEPA-FWS referral report. The directive does not indicate the standards and best management practices do</p>

			<p>not apply in urban areas. However, AUC does not enforce the same expectation in urban areas as on reserves. Many rural urban areas have significant wildlife within urban boundaries and many waterbodies with significant wildlife habitats. The density of wildlife can be greater in some urban areas than in rural power project areas. The AEPA-FWS letter for urban projects indicates they recommend the Proponent implement the standards and best management practices outlined in the Solar Directive as much as possible. Developments in urban areas should be required to explain in their application why they did not follow the standards and best management practices. Because they wanted a specific size of project is not a good reason to reduce the setbacks. The project should not be sited on a parcel of land if it does not give the desired output when abiding by the Wildlife Directive standards and best management practices.</p> <p>I believe urban developments must abide by the standards and best management practices and the AUC should enforce it, the same as on reserves.</p>
16.		Information requests	<p>It would be a useful exercise to review some AUC applications to determine what items are typically asked for in IRs. Consideration of including a list of minimum expectations for each area would ensure more complete applications and less follow-up by all parties.</p>
17.		CV	<p>Consider making it a requirement to have CV attached to the end of each expert report at the time of submission.</p>
18.		Setbacks – solar from residences	<p>I believe the minimum setback should be 800 m. People spend a significant part of their life at their residence. Solar projects are relatively new and the long-term consequences are mostly unknown. The value of people’s retirement assets should not be arbitrarily impacted by large industrial developments that were not contemplated when the residences were acquired. Much time is spent</p>

			considering the wildlife impacts but in at least one recent AUC decision, insufficient consideration was given to a significant group of immediately adjacent residents. Density of residences should be an important consideration in the decision.
19.		Setback - solar from aerodromes	I believe it should be a minimum of 1,600 m setback from an uncontrolled aerodrome. There is too much risk because of the need to visually identify other planes as the primary safety method and the pilots should not be distracted by glare from solar projects.

Table AA

PIP

Date	Activity	Location	Summary
2024 01 05	Town council meeting	Town Office	Introductions and described project
	Additional details .....		
2024 02 23	Newspaper ad	Town Herald	Outlined the upcoming open house 2024 03 23
	Additional details .....		
2024 03 23	Open house	Town Civic Centre	Approx 25 in attendance
	Additional details .....		
2024 04 01-05	Door knocking	Within 400 m	Door knocked at 50 properties – had conversations with people from 15 properties
	Additional details .....		
2024 06 01	Canada Post Precision Targeter	Within these postal codes XXX, XXX	This postcard mailout was directed to all properties located within 800 m of the project boundary.
	Additional details .....		
etc			

Table BB

Suggested format for Table A1-3 of Rule 007

Column	Title	
A.	Name	
B.	Company Name	
C.	Address 1	
D.	Address 2	
E.	City	
F.	Province	
G.	Postal Code	
H.	Country	
I.	Email address (optional)	
J.	Address valid	Indicate "No" if mail was returned and no new mailing address could be located or the email address is invalid.
K.	Type	Indicate what type of Person, (Occupant, Resident, Landowner, Municipality, Indigenous group, Aerodrome owner, Interested party etc)
L.	Land Location	Eg "101 – 3 Avenue SW, Town", "Plan 4567, Block 2 (Portion of SW 1-5-7-W4)", or "SW 1-5-7-W4" etc
M.	Map Number	Landowner number indicated on the project surrounding area map submitted by the developer
N.	Proximity	Indicate whether Person is located inside 400 m, 800 m or outside 800 m of project boundary. Inputs are "400", "800" or "Other".
O.	Precision Targeting	Enter "Yes" if postal code was included in notification sent by Canada Post's Precision Targeting mailout
P.	Addressed mail	Enter "Yes" if notification was mailed or couriered
Q.	Email	Enter "Yes" if notification was emailed
R.	Other	Indicate other method of notification
S.	Consultation	Enter "Yes" if meaningful two-way communication regarding concerns occurred by one of these methods - email, phone, video, other electronic communication, or face-to-face meeting
T.	Noise receptor number	
U.	Glare receptor number	

Table CC

**Power Project Reclamation Funding Calculation**

Developer name:   
 Project name:   
 AUC Project #:

Version:

Inputs:

- 2.0% Investment return on cash security
- 3.0% Inflation on reclamation costs
- 4.0% Inflation on salvage values
- 10,000,000 Estimated Reclamation Cost (entire project)- current year dollars
- 4,000,000 Estimated Salvage Value (entire project) - current year dollars
- 50% Maximum portion of reclamation funding funded by salvage value

Column:   
 Increase:

	A 2.0%		B		C1 4.0%		C2		D	E 3.0%		F
	Increase in Cash Security	Cumulative Cash Security	Increase in Credit Facility	Cumulative Credit Facility	Salvage Value	Cumulative Salvage Value	Maximum Salvage Value	Cumulative Maximum Salvage Value	Cumulative Reclamation Security A+B+(min(C1,C2))	Increase in Reclamation Cost	Cumulative Reclamation Cost	Reclamation Funding Over (Short) D - E
Year 1		0		0	4,000,000	4,000,000	5,000,000	5,000,000	4,000,000	10,000,000	10,000,000	(6,000,000)
Year 2		0	1,000,000	1,000,000		4,160,000		5,150,000	5,160,000		10,300,000	(5,140,000)
Year 3		0		1,000,000		4,326,400		5,304,500	5,326,400		10,609,000	(5,282,600)
Year 4		0		1,000,000		4,499,456		5,463,635	5,499,456		10,927,270	(5,427,814)
Year 5	1,000,000	1,000,000		1,000,000		4,679,434		5,627,544	6,679,434		11,255,088	(4,575,654)
Year 6		1,020,000	1,000,000	2,000,000		4,866,612		5,796,370	7,886,612		11,592,741	(3,706,129)
Year 7		1,040,400		2,000,000		5,061,276		5,970,261	8,101,676		11,940,523	(3,838,847)
Year 8		1,061,208		2,000,000		5,263,727		6,149,369	8,324,935		12,298,739	(3,973,804)
Year 9		1,082,432		2,000,000		5,474,276		6,333,850	8,556,708		12,667,701	(4,110,992)
Year 10	1,000,000	2,104,081		2,000,000		5,693,247		6,523,866	9,797,328		13,047,732	(3,250,404)
Year 11		2,146,162	1,000,000	3,000,000		5,920,977		6,719,582	11,067,140		13,439,164	(2,372,024)
Year 12		2,189,086		3,000,000		6,157,816		6,921,169	11,346,902		13,842,339	(2,495,437)
Year 13		2,232,867		3,000,000		6,404,129		7,128,804	11,636,996		14,257,609	(2,620,613)
Year 14		2,277,525		3,000,000		6,660,294		7,342,669	11,937,819		14,685,337	(2,747,518)
Year 15	1,000,000	3,323,075		3,000,000		6,926,706		7,562,949	13,249,781		15,125,897	(1,876,116)
Year 16		3,389,537	1,000,000	4,000,000		7,203,774		7,789,837	14,593,311		15,579,674	(986,363)
Year 17		3,457,327		4,000,000		7,491,925		8,023,532	14,949,252		16,047,064	(1,097,812)
Year 18		3,526,474		4,000,000		7,791,602		8,264,238	15,318,076		16,528,476	(1,210,400)
Year 19		3,597,003		4,000,000		8,103,266		8,512,165	15,700,270		17,024,331	(1,324,061)
Year 20	1,000,000	4,668,944		4,000,000		8,427,397		8,767,530	17,096,340		17,535,061	(438,720)
Year 21		4,762,322	1,000,000	5,000,000		8,764,493		9,030,556	18,526,815		18,061,112	465,703
Year 22		4,857,569		5,000,000		9,115,072		9,301,473	18,972,641		18,602,946	369,695
Year 23		4,954,720		5,000,000		9,479,675		9,580,517	19,434,395		19,161,034	273,361
Year 24		5,053,815		5,000,000		9,858,862		9,867,933	19,912,677		19,735,865	176,812
Year 25		5,154,891		5,000,000		10,253,217		10,163,971	20,318,861		20,327,941	(9,080)
Year 26		5,257,989	1,000,000	6,000,000		10,663,345		10,468,890	21,726,878		20,937,779	789,099
Year 27		5,363,149		6,000,000		11,089,879		10,782,956	22,146,105		21,565,913	580,192
Year 28		5,470,412		6,000,000		11,533,474		11,106,445	22,576,857		22,212,890	363,966
Year 29		5,579,820		6,000,000		11,994,813		11,439,638	23,019,458		22,879,277	140,181
Year 30		5,691,416		6,000,000		12,474,606		11,782,828	23,474,244		23,565,655	(91,411)