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March 26, 2025

Alberta Utilities Commission
600 3 Ave SW Tower 1400
Calgary, AB T2P 0R4

Subject: AUC Rule 007 Feedback

Dear Alberta Utilities Commission,

Thank you for the opportunity to provide written feedback on the Rule 007: Facility Applications draft blackline. We appreciate the Commission's efforts to provide key feedback into an important process and upcoming draft changes.

PACE has reviewed the draft blackline and provided overall comments and recommendations for the AUC. We thank you for the opportunity to contribute and for your work.

Sincerely,

Jon Poulin

Jon Poulin
Director of Development & Engineering
PACE Canada

Rule 007 Feedback

Issue: Visual impact assessments

PACE's Feedback: PACE supports the feedback provided by subject matter expert Green Cat Renewables (GCR), particularly the recommendation that Visual Impact Assessments (VIAs) should focus only on views from National Parks and UNESCO Sites identified in LUVAR, rather than the broader Buffer and VIA Zones. We also request clearer definitions and assessment criteria, agree that local visual impacts are best addressed through stakeholder consultation, and believe that any mitigation measures should be considered on a case-by-case basis and informed by finalized project designs.

Issue: Timelines to construct

PACE's Feedback: As a developer, we're aware of numerous factors that can delay project timelines and significantly impact energization schedules, including:

- Construction funding challenges
- Delays by DFOs/TFOs in completing studies and providing interconnection cost estimates, which push back construction start dates
- Bottlenecks in funding transfers to TFOs when routed through DFOs
- Procurement delays for long-lead items
- Shifts in procurement strategies to navigate tariff risks or supplier availability
- Evolving concerns about congestion, curtailment, and market uncertainty that can undermine investment confidence.
- Broader systemic disruptions such as government policy changes, moratoriums, REM developments, pandemics, wars, and supply chain interruptions.

Given these potential delays, the 5-year construction period may be insufficient in some cases. We recommend the AUC consider a more flexible approach, such as a fee structure, to encourage timely completion by both generators and DFOs/TFOs, while still allowing projects to proceed beyond the 5-year timeframe without requiring a full restart.

Issue: Solar glare

PACE's Feedback: PACE echoes the feedback of subject matter expert Green Cat Renewables (GCR) in expressing concern that the AUC's proposed changes to solar glare assessment requirements in Rule 007 are overly conservative. Given that no safety issues or complaints have been reported from operational solar projects in Alberta over nearly a decade, we support GCR's recommendation to align assessments with peer-reviewed studies and established regulatory practices—such as applying $\pm 15^\circ$ field of view for drivers and deferring to the expertise of agencies like NAV Canada and Alberta TEC. PACE also agrees that detailed glare mitigation should be based on final designs or observed impacts, not theoretical modelling alone, as the proposed requirements risk unnecessarily burdening well-sited projects without improving public safety or interest.

Issue: Shadow flicker requirements

PACE's Feedback: PACE supports modelling both a Worst-Case and Adjusted-Case Scenario for shadow flicker assessments but disagrees with introducing a strict daily shadow flicker limit based on the Worst-Case Scenario, as it's overly conservative and unlikely to reflect real-world conditions.