



OFFICE OF THE MAYOR
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May 20, 2025

Alberta Utilities Commission
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To Whom It May Concern,

RE: AUC Public Engagement for Rule 007 – Applications for Power Plants

Agricultural Land Impacts

Red Deer County would like to express its position related to the AUC's Rule 007 draft blackline. Council has worked together collectively to identify primary issues to be brought forward to the AUC for their consideration as part of the public engagement process. Agricultural land impacts and the need for more clarity respecting consultation with municipalities is paramount.

Red Deer County's Municipal Development Plan indicates that Agriculture is the County's primary industry and mainstay of its history, rural character, and culture. The protection of agricultural operations and minimizing the conversion of agricultural lands to non-agricultural uses is a priority.

The development of power plants on agricultural land is a growing concern for rural municipalities. The trend seen to date is to utilize agricultural land for power plant projects in some locations. As per the County's Land Use Bylaw 2022/26 the Agricultural district is to accommodate and support an evolving agricultural industry and associated rural lifestyles.

County Council believes the agricultural component for AUC rule 007 needs to be enhanced. Agricultural land shall continue to be primarily used for agricultural production. Should any power plant developments be considered on agricultural land it should be considered a secondary use. We are concerned that the footprint of the various proposals could take a substantial amount of agricultural land out of production going against the County's MDP which mandates the County to minimize the conversion of agricultural lands to non-agricultural uses. Red Deer County has received several different inquiries about natural gas power plants, large scale solar facilities, and a battery storage development. Many of these developments would be more appropriate in an industrial area where adjacent land use would be more compatible with the development and the land would not be removing additional agriculture. Rule 007 does not require Agricultural Impact Assessments for thermal power plants or other power plants, such as biomass or geothermal power plants. For consistency, all power plants intended to be sited on high quality agricultural land should require Agricultural Impact Assessments.

Should applications proceed with the AUC for a power plant development we ask that there be consideration to have the applicant provide a minimum of three years data demonstrating crop production to ensure the Agricultural Productivity and Agricultural Impact Assessment requirement includes reflective data. Red Deer County Council would request that consideration be given to requiring the applicant to provide a matrix demonstrating power generation vs agricultural loss as part of the Agricultural Impact Assessment. The matrix would be intended to demonstrate public benefit for the development of a power plant, how much power it provides to the community vs agricultural production or loss due to the power plant development. The lack of equivalency standards and minimum productivity thresholds required by the Rule may lead to issues with productivity and a failure to achieve dual production goals. The AUC should include equivalency standards and minimum of three years productivity thresholds within Rule 007 to avoid significant reductions in agricultural productivity. There needs to be a balance between development opportunities with agricultural land protection.

Engagement with Municipalities

More clarity and guidance from the AUC are required on what consultation with municipalities and other stakeholders looks like. The language describing consultation in Rule 007 is vague, relying on terms such as “may consider,” “goes beyond,” and “it may be necessary.” The guidance and requirements related to notification and consultation is not specific and provides the proponent with significant flexibility to avoid suggested requirements with no consequences. It is recommended that the AUC requires municipal confirmation that the project aligns with existing land use plans and documents, and that this alignment is based on discussion and common understanding from both the municipality and project proponent. Red Deer County requests that the AUC consults with Municipalities to ensure power plant projects adhere to the municipalities’ statutory and non-statutory plans and bylaws. We request that the local residents and landowners be recognized and engaged with during the AUC process. It is important that the AUC provides accessible, timely and easy to understand information on how to participate in the approval process.

Conclusion

In regard to AUC 007 draft blackline Red Deer County requests that there be consideration to the following:

- Agricultural lands be protected and loss of agricultural land be limited.
- Agricultural lands remain the primary use while balancing power plant development as a secondary use.
- Consideration is given to the footprint of power plants to minimize loss of agricultural land.
- Consideration to have the applicant provide a minimum of three years data demonstrating crop production to ensure the Agricultural Productivity and Agricultural Impact Assessment includes reflective data.
- Consideration is given to requiring the applicant to provide a matrix demonstrating power generation vs agricultural loss as part of the Agricultural Impact Assessment.
- Consideration is given to direct some power plants to industrial lands to ensure compatible land uses coexist.
- The AUC consults with Municipalities to ensure power plant projects adhere to the municipalities’ statutory and non-statutory plans and bylaws.
- Local residents and landowners recognized in AUC process.
- The AUC provides accessible, timely and easy to understand information on how to participate in the approval process.



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If you require more information Red Deer County Councils submission, please do not hesitate to contact the undersigned. Thank you for providing the opportunity for Albertans to make submissions into your inquiry.

Sincerely,

RED DEER COUNTY

A handwritten signature in cursive script that reads "Jim Wood".

Jim Wood, Mayor

cc: Red Deer County Council
Chief Administrative Officer
Planning & Development Services