

May 23, 2025

Alberta Utilities Commission
 1400, 600 – 3rd Ave SW
 Calgary, AB T2P 0G5

Submitted by email to engage@auc.ab.ca

To Whom it May Concern,

RE: AUC Public Engagement for Rule 007 – Facility Applications

TransCanada Energy Ltd. (TCE), a wholly owned subsidiary of TC Energy Corporation, owns and operates approximately 450 MW of cogeneration in has recently constructed and began operation of the 81 MW Saddlebrook Solar Facility. We appreciate the opportunity to provide feedback on the proposed changes to Rule 007 that were shared in the draft blackline version of the Rule.

The following table summarizes our feedback on the some of the proposed changes:

Requirement	Feedback
'Describe any public benefits that will be generated by the proposed project'.	While TCE is supportive of the opportunity to provide details of public benefits generated, suggest that the AUC provide clarity on the list of benefits that they are looking for, and whether there is a specific study or standard that is expected to be followed.
Visual Impact Assessment	If the project is located within a buffer zone or a visual impact assessment zone as defined within the <i>Electric Energy Land Use and Visual Assessment Regulation</i> , Rule 007 requires visual simulations from 'key vantage points', which should include locations with 'valued viewscapes'. However, there is no definition of 'valued viewscapes', which could result in a subjective selection of these vantage points, as well as subjective evaluation by the Commission. TCE recommends that 'valued viewscapes' be defined so that a consistent approach in selecting locations for visual simulation can be applied.
Initial Time Period to Construct – 'From the power plant's initial approval date, applicants will have five years to finish construction.'	While TCE recognizes the importance of demonstrating a proponent's commitment to project development following approval, we are concerned that a five-year timeline may not always provide sufficient time to finish construction. Large civil projects such as hydro or SMR's require a much longer construction timeframe compared smaller types of projects.

Requirement	Feedback
	<p>In addition to the current uncertainty around the restructured energy market design and legislative changes causing hesitation in making investment decisions, there are several activities that occur following receipt of project approval, including:</p> <ul style="list-style-type: none"> - Secure final investment decision - Finalize detailed engineering - Order long lead time equipment (current timelines for delivery of gas turbines can range from 2 to 4 years) - Commence and finalize construction <p>TCE proposes that the time period to construct be extended to 7 to 10 years, with periodic updates to the AUC regarding the project's progress on the above to appropriately demonstrate a developer's commitment to the project.</p> <p>If a five year time period to construct is maintained, TCE recommends that consideration for extension be given to projects that have incurred significant cost, have executed customer or contractor agreements, or pilot projects implementing emerging technologies that experience delays beyond their reasonable control.</p>

Thank you again for the opportunity to provide feedback. Should you have any questions, please do not hesitate to contact the undersigned.

Sincerely,

Joanne Tatham
 Manager, Regulatory Services, Power & Energy Solutions