Application to the Alberta Utilities Commission

Ponoka Solar Project

Power Plant & Interconnection Application

December 15, 2023

Acestes Power ULC
210B, 9705 Horton Road SW
Calgary, AB, T2V 2X5

List of Appendices

Application Introduction

Acestes Power ULC (Acestes) hereby makes an application to the Commission, pursuant to Section 11 of the *Hydro and Electric Energy Act* (HEEA) for the construction and operation of a 23.2 megawatt (MW) solar power project, known as the Ponoka Solar Project (the Project) and connection of the power plant to an electric distribution system pursuant to Section 18 of the HEEA.

All communication regarding this application should be directed to:

Samantha Brown
SABR Energy Consulting Inc.
C | 587-434-7547
E | sbrown@sabrenergyconsulting.com

Dated at the City of Calgary, in the Province of Alberta, this 15th day of December 2023.

Signed by:

Clyde Carr
Managing Consultant

Executive Summary

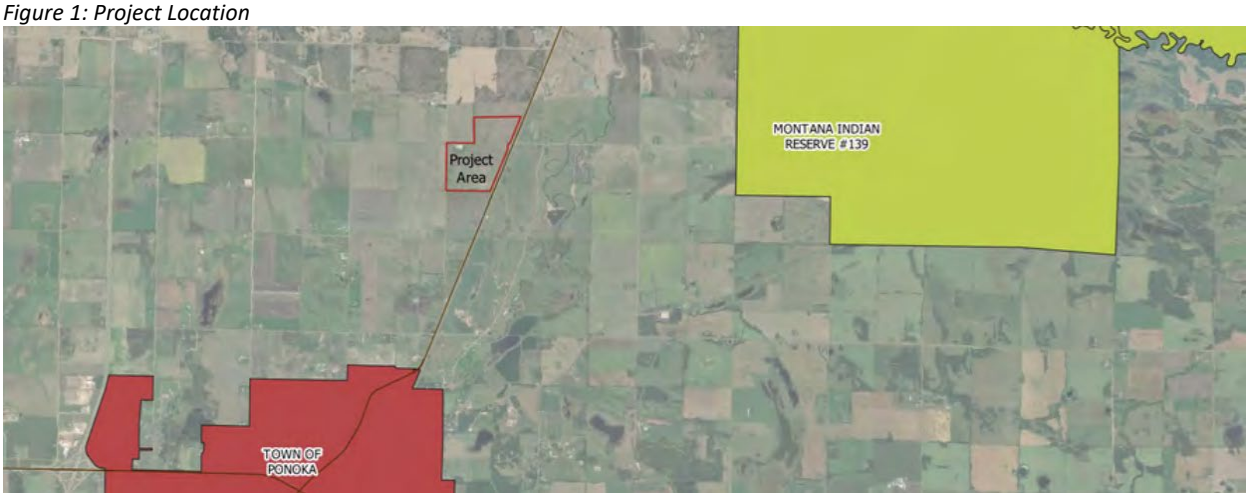
Project Overview

Acestes Power ULC (Acestes) is proposing to construct and operate the 23.2-megawatt (MW) Ponoka Solar Project (the Project) located on freehold land in the Ponoka County. The proposed Project will consist of bifacial solar PV modules on a single-axis tracking (SAT) system, inverter/transformer stations, underground collector lines that connect to an electrical house and switchgear building and an internal road network.

Project Location

The proposed Project is located on the NW 22-43-25 W4M on approximately 161 fenced acres of privately owned, cultivated land approximately 3km north east of the Town of Ponoka, as shown in Figure 1.

Figure 1: Project Location



Project Schedule

The preliminary Project schedule is as follows:

Submission to Alberta Environment & Protected Areas	March 2023
Initial Public Notification	March 2023
Personal Consultation	Ongoing
AEP Referral Report Received	October 2023
AUC Applications	December 2023
Anticipated AUC Approval	April 2024
Municipal Development Permit Application	April 2024
Municipal Development Permit Approval	June 2024
Construction Start	February 2025
Commercial Operation Date	December 2025

In order to maintain this schedule, approval of this Application is required by April 30, 2024.

Corporate Information

Acestes is part of a family-owned group of businesses that have been active in the Alberta agricultural and real estate sectors for over 100 years. The management's strong relationships and experience in the province include 27 years in the electricity sector. Acestes previously developed the Monarch Solar

Project, Coaldale Solar Project and Vulcan Solar Project, which finished construction in 2022; the Stavely Solar project, which finished construction in summer 2023; the Tilley Solar Project which will finish construction in 2024; and the Duchess Solar Project, scheduled to begin construction in 2024.

List of Acronyms

ACO	Aboriginal Consultation Office
AEPA	Alberta Environment and Protected Areas
AGRASID	Alberta Soil Inventory Database
AUC	Alberta Utilities Commission
DFO	Distribution Facility Owner
EPP	Environmental Protection Plan
ERP	Emergency Response Plan
HEEA	Hydro and Electric Energy Act
HRA	Historical Resources Act
ISO	Independent Systems Operator
km	Kilometre
kV	Kilovolt
LSD	Legal Subdivision
LSRS	Land Suitability Rating System
LUB	Land Use Bylaw
m	Metres
MDP	Municipal Development Plan
MW	Megawatt
NIA	Noise Impact Assessment
PIP	Participant Involvement Program
REO C&R	Renewable Energy Operations Conservation and Reclamation
SSSGRAIN	Spring-seeded Small Grains
WECS	Windmills Energy Conservation Systems

Power Plant Application

Project Description

SP1 – Requested Approvals
State the approvals that are being applied for from the AUC and describe the power plant and collector system, including the number of solar photovoltaic panels and their make, model and the nominal capability of each solar photovoltaic panel in MW and the total capability of the power plant in MW, including battery storage, if applicable. If the vendors have not been selected or the equipment has not been finalized, provide:

- **The total capability of the power plant in MW, including battery storage, if applicable.**
- **The anticipated type and number of solar modules, the physical dimensions of the solar array and the type of solar tracking system, if applicable.**

Acestes is requesting the following approvals:

- Construct and operate a power plant pursuant to Section 11 of the Hydro and Electric Energy Act, c H-16, R.S.A. 2000 (the HEEA), as amended; and
- Connection of the power plant to an electric distribution system pursuant to Section 18 of the HEEA.

The proposed Ponoka Solar Project (the Project) is a 23.2 megawatt (MW) solar power project consisting of 56,000 Canadian Solar BiHiKu7 BS7N650MB-AG bifacial modules with a rated output of 650W each mounted on single-axis tracker racking. The make and model of the panels are not finalized but will not exceed the output applied for in this Application. The Project also includes seven Sungrow 3600UD Inverters. A site layout is included in Appendix A, which further details the design of the power plant.

SP2 – Existing Approvals
Provide a list of existing approvals for facilities directly affected by this project, if any.
There are no existing approvals directly affected by this Project.

SP3 – Ownership Structure
Provide details of the project ownership structure, including the names of all companies having an ownership interest in the project and their ownership share, and if applicable, the name of the project operator. Confirm that the applicant is a qualified owner.
Acestes Power ULC is 100% owner of the Project. The certificate of incorporation for Acestes Power ULC is included as Appendix B. To confirm, the applicant is a qualified owner.

SP4 – Municipal Interest
For a municipality or a subsidiary of a municipality to hold an interest in a generating unit, provide documentation confirming compliance with Section 95 of the *Electric Utilities Act*.
Not applicable as there is no municipal interest in the Project.

SP5 – Project Location
Describe the location of the project:

- **Provide the legal description of the proposed power plant site (legal subdivision [LSD], section, township, range, meridian and/or plan, block, lot, municipal address for urban parcels) and connection point, if applicable.**

- **Provide a Keyhole Markup Language (.kml/.kmz) file that contains the geographic data of each of the major components, including substation locations and project boundary of the proposed power plant. This file should reflect the information shown on the drawings and maps submitted to address information requirement SP6.**

The proposed Project is located within NW 22-43-25 W4M, and the connection point is in LSD 12 of section 22-43-25 W4M. A kml file including major components of the Project is included as Appendix C.

SP6 – Project Maps
Provide the following drawings and maps with units of measure/scale and the direction of north specified:

i. A legible plant site drawing showing the solar array, collector substations, collector lines and access roads and the power plant site boundary.
The site layout is included as Appendix A.

ii. Legible maps showing:

- **The power plant site boundary.**
- **Land ownership of surrounding lands, including any residences and dwellings within the notification radius described in Appendix A1 – Participant involvement program guidelines, Table A1-1: Electric facility application notification and consultation requirements.**
- **Neighbouring municipalities, First Nation reserves, Metis Settlements, including nearby roads, water bodies and other landmarks that may help identify the general location of the project area. This map may be at a larger scale than the detailed maps provided in response to other information requirements.**
- **All registered aerodromes and any known unregistered aerodromes within 4,000 metres of the edge of the proposed power plant site boundary.**
- **Important environmental features and sensitive areas in the local study area.**
- **Any additional energy-related facilities within the project area.**
- **The proposed collector line route or routes, and major land use and resource features (e.g., vegetation, topography, existing land use, existing rights-of-way). This information should also be provided in air photo mosaics.**

A landowner map is included as Appendix B of the Participant Involvement Program (PIP) Report (Appendix D). An overview map showing the neighboring municipalities, First Nation reserves, Metis Settlements, nearby roads and other information to identify the location of the Project is included as Appendix E.

No registered aerodromes were located within 4km of the Project boundary and no unregistered aerodromes were identified through consultation within 4km of the Project boundary.

Important environmental features and major land use and resource features are included in the Environmental Evaluation (Appendix F).

The proposed collector line design has not yet been completed and existing energy related facilities within the Project area are shown on the site layout (Appendix A).

SP7 – Requested Approval Date
Provide the requested approval date from the Commission, the expected construction start date, the expected in-service date of the project and the requested construction completion date to be used in the project approval. Provide the rationale for these dates.
The requested approval date from the Commission is April 30, 2024. The expected construction commencement date is February 2025, beginning with site clearing and grading activities, and the expected in-service date is December 2025. To allow for any unforeseen delays, Acestes respectfully requests a construction completion date of June 30, 2026 in the Project approval.

Project Connection

SP8 – Connection Order
If a connection order is not concurrently being applied for, provide the expected date when the connection order application will be submitted.
A connection order is being applied for as part of this Application.

SP9 – Asset Identification Code
Provide the asset identification code assigned by the independent system operator (ISO) and the ISO Project ID number related to your system access service request, if available.
The asset identification code has not yet been assigned by the ISO however the Project ID number related to the system access services request is P2718.

SP10 – Interconnection Details
If the power plant is to be connected to the transmission system, provide a map with one or more conceptual layouts showing possible routes and general land locations for facilities that would be used to interconnect the power plant to the Alberta Interconnected Electric System.

If the power plant is to be connected to the distribution system, provide a statement from the distribution facility owner indicating that it is willing to connect the generating facilities.
A letter from the Distribution Facility Owner (DFO) FortisAlberta confirming they are willing to connect the Project is included as Appendix G.

Emergency Response Plan

SP11 – Emergency Response Plan Overview
Confirm the applicant has or will have a corporate or site-specific emergency response plan for the construction and operation of the proposed power plant. If the applicant will have a corporate emergency response plan, please explain why it decided not to develop a site-specific emergency response plan.
A site-specific emergency response plan (ERP) has been prepared for the Project and is included as Appendix H.

SP12 – Risk Management
Provide a summary of the following:

- **The site-specific risks (construction phase and operations phase) that have been identified to date.**
- **The emergency mitigation measures that have been identified.**
- **The site monitoring and communication protocols that will be put into place.**

General site-specific risks identified to date include the following, as further detailed in the site-specific ERP:

- Medical Emergency: worker injury such as slips/trips/falls/burns or personal medical issue
- Severe Weather/Catastrophic Emergency: thunderstorms, floods, wind and downed power lines, snow and ice
- Fire: small fires, large fires, wildland/grassfire or electrical fire
- Hazardous Material Emergency: chemical spills, equipment failures, environmental conditions dangerous to personnel.

Preliminary emergency mitigation measures that have been identified and site monitoring / communication protocols are outlined in the ERP and will be updated prior to construction commencement.

SP13 – Emergency Response Consultation
Confirm that local responders and authorities have been contacted or notified regarding the project emergency response plan. Describe any requirements or feedback received and describe how the applicant intends to address the requirements and feedback received.
Ponoka County's Development Officer and Director of Emergency Management were contacted and provided a copy of the ERP. Feedback with respect to updated contacts was received and incorporated into the ERP. No further questions, comments or feedback were received by Acestes. Acestes intends to continue to consult with local responders and authorities through the development, construction and operation of the Project.

Solar Glare Assessment

SP14 – Solar Glare Assessment Report
Submit a solar glare assessment report that predicts the solar glare at receptors within 800 metres from the boundary of the project and registered aerodromes and known unregistered aerodromes within 4,000 metres from the boundary of the project where the potential for glare is possible. The assessment report must:

- **Describe the time, location, duration and intensity of solar glare predicted to be caused by the project.**
- **Describe the software or tools used in the assessment, the assumptions and the input parameters (equipment-specific and environmental) utilized.**
- **Describe the qualification of the individual(s) performing the assessment.**
- **Identify the potential solar glare at critical points along highways, major roadways and railways.**

- **Identify the potential solar glare at any registered and known unregistered aerodromes within 4,000 metres from the boundary of the project, including the potential effect on runways, flightpaths and air traffic control towers.**
- **Include a map (or maps) identifying the solar glare receptors, critical points along highways, major roadways and railways and aerodromes that were assessed.**
- **Include a table that provides the expected intensity of the solar glare (e.g., green, yellow or red) and the expected duration of solar glare at each identified receptor, critical points along highways, major roadways and railways and any registered and known unregistered aerodromes.**

Acestes retained RWDI to prepare a solar glare hazard assessment (Glare Analysis) for the Project. As per the Glare Analysis included as Appendix I, "the Ponoka Solar Project was not predicted to create red glare at any of the studied receptor locations, assuming that the resting angle is at 3°. Yellow glare was predicted along Range Road 253 (RR5) and Bobtail Road (RR1), though only in a very small fraction of the year (approximately 0.1.17% and 0.0.53% respectively, of the daytime at most over a year). Please refer to Appendix I for additional information.

Environmental Information

SP15 – Environmental Evaluation

If preparation of either a federal impact assessment or a provincial environmental impact assessment report was required, provide a copy as an appendix to the application and a separate environmental evaluation is not required. If a federal impact assessment or a provincial impact assessment report was not required, submit an environmental evaluation of the project. The environmental evaluation must:

- **Describe the present (pre-project) environmental and land use conditions in the local study area.**
- **Identify and describe the project activities and infrastructure that may adversely affect the environment.**
- **Identify the specific ecosystem components (i.e., terrain and soils, surface water bodies and hydrology, groundwater, wetlands, vegetation species and communities, wildlife species and habitat, aquatic species and habitat, air quality and environmentally sensitive areas) within the local study area that may be adversely affected by the project.**
- **Describe any potential adverse effects of the project on the ecosystem components during the life of the project.**
- **Describe the methodology used to identify, evaluate and rate the adverse environmental effects and determine their significance, along with an explanation of the scientific rationale for choosing this methodology.**
- **Describe the mitigation measures the applicant proposes to implement during the life of the project to reduce the potential adverse effects.**
- **Describe the predicted residual adverse effects of the project and their significance after implementation of the proposed mitigation.**

- **Describe any monitoring activities the applicant proposes to implement during the life of the project to verify the effectiveness of the proposed mitigation.**
- **List the qualifications of the individual or individuals who conducted or oversaw the environmental evaluation.**

Acestes retained McCallum Environmental Ltd. to complete the environmental assessments for the Project. An environmental evaluation is included as Appendix F.

SP16 – Projects on Federal Lands
For projects wholly or partially located on federal lands (First Nation reserves, national parks or military bases), provide a copy of the environmental impact analysis completed for the corresponding federal government department. Indicate whether the project has the potential to cause effects that may cross into another jurisdiction. Environmental effects that originate on federal lands, but cross into another jurisdiction, must be addressed as part of the environmental review process. Projects on federal lands may be subject to provincial laws, standards and permits. The applicant must address how it has considered AUC Rule 007, Rule 012 and Rule 033 and describe the steps taken, if any, to address specific requirements set out in these rules.
Not applicable as the Project is not located on federal lands.

SP17 – Environmental Protection Plan
Submit a stand-alone, project-specific environmental protection plan (or environmental management plan) that itemizes and summarizes all of the mitigation measures and monitoring activities that the applicant is committed to implementing during construction and operation to minimize any adverse effects of the project on the environment.
A stand-alone, project-specific environmental protection plan is included as Appendix IV of the Environmental Evaluation (Appendix F).

End of Life Management

SP18 – C&R Plan
Submit a copy of the initial renewable energy operations conservation and reclamation plan (REO C&R Plan) as set out in the Conservation and Reclamation Directive for Renewable Energy Operations.
An initial renewable energy operations conservation and reclamation plan (REO C&R Plan) is included as Appendix V of the Environmental Evaluation (Appendix F).

SP19 – Decommissioning and Reclamation Costs
Provide an overview of how the operator will ensure sufficient funds are available at the project end of life to cover the cost of decommissioning and reclamation.
The privately held land lease includes a provision whereby Acestes builds a dedicated fund for decommissioning and reclamation over the life of the project.

Upon the start of construction a dedicated fund will be established as a form of security that is mutually acceptable to the landowner and Acestes. The amount of the security is set out in the confidential land lease, including annual increases during the life of the power plant to account for cost inflation. The security will be released by the landowner once Acestes has met its decommissioning and reclamation obligations.

Acestes will engage a qualified independent third-party to estimate the decommissioning and reclamation costs prior to the start of construction, which will contemplate inflation over the life of the project.

Acestes will have full responsibility for the decommissioning of the power plant and reclamation of the leased lands. This will entail the dismantling and removal of all chattels, fixtures, roadways and other improvements from the leased lands and restoring the leased lands to a condition that meets all applicable governmental and regulatory requirements. As stated above, the security provided to the landowner will only be released by the landowner once Acestes has met its decommissioning and reclamation obligations. Acestes will also continue to make rental payments to the landowner while the decommissioning and reclamation work is being done.

Noise

SP20 – Noise Impact Assessment
Provide a noise impact assessment in accordance with Rule 012.
Acestes retained RWDI to complete a noise impact assessment (NIA) in accordance with Rule 012, which is included as Appendix J.

Approvals, Reports and Assessments from Other Agencies

SP21 – Other Acts and Approvals
Identify any other acts (e.g., Environmental Protection and Enhancement Act, Water Act, Public Lands Act and Wildlife Act) that may apply to the project, identify approvals the project may require, and provide the status of each of these approvals.
Other Acts that may potentially affect the Project include:

- Alberta Utilities Commission Act, S.A. 2007, c.A-37.2;
- Alberta Land Stewardship Act, S.A. 2009, c.A-26-88;
- Electric Utilities Act, S.A. 2003 c E-5.1;
- Environmental Protection and Enhancement Act, R.S.A. 2000, c.E-12;
- Historical Resources Act, R.S.A. 2000, c.H-9;
- Migratory Birds Convention Act, S.C. 1994, c.22;
- Municipal Government Act, R.S.A. 2000, c.M-26;
- Occupational Health and Safety Act, S.A. 2017 c.0-2.1;
- Public Highways Development Act, R.S.A. 2000, c.P-38;
- Safety Codes Act, R.S.A. 2000, c.S-1;
- Soils Conservation Act, R.S.A. 2000, c. S-15;
- Species at Risk Act, S.C. 2002. c.29;
- Wildlife Act, R.S.A. 2000, c. W-10;
- Water Act, R.S.A. 2000, c.W-3; and
- Weed Control Act, S.A. 2008, c. W-5.1.

Other approvals the Project may require include:

- NAV Canada – Approval was received September 21, 2023
- Transport Canada – Approval was received on May 31, 2023
- Historical Resources Act – Approval was received on April 28, 2023
- Alberta Environment and Protected Areas – referral report received October 20, 2023

- Ponoka County Municipal Permits – Development Permit Application will be submitted following the AUC permitting process, if approved
- Alberta Transportation Roadside Development Permit – has been applied for and approval is expected in Q1 2024

SP22 – Renewable Energy Referral Report

Submit a signed renewable energy referral report from Alberta Environment and Parks (AEP) Fish and Wildlife Stewardship. If the applicant is unable to provide a renewable energy referral report at time of application, the applicant must clearly identify the reason and provide details of its status.

A signed renewable energy referral report from Alberta Environment and Protected Areas (AEPA) Fish and Wildlife Stewardship was received on October 20, 2023 and is included as Appendix K.

SP23 – Historical Resources Act Approval

Confirm that a Historical Resources Act approval has been obtained or has been applied for. If a historic resource impact assessment is required, briefly describe any known historical or archaeological sites, palaeontological sites, or traditional use sites of a historic resource nature. If a Historical Resources Act approval has been obtained, provide a copy of it.

Historical Resources Act approval was received on April 28, 2023 and the approval is included as Appendix L.

SP24 – Indigenous Consultation

If the government of Alberta, through the Aboriginal Consultation Office (ACO) or otherwise, directed consultation with an Indigenous group for related approvals (i.e., Public Lands Act, Water Act, Environmental Protection and Enhancement Act, Historical Resources Act, Government Organization Act, etc.) the applicant must provide a copy of the pre-consultation assessment, the adequacy assessment and the specific issues and response table (if prepared). If the government of Alberta, through the ACO or otherwise, indicated that a pre-consultation assessment is not required, the applicant must provide a copy of that direction. If advice from the government of Alberta has not been obtained, the applicant must provide justification for its decision to not seek advice.

Please refer to page 8 of the PIP Report (Appendix D).

Participant Involvement Program

SP25 – PIP Overview

Summarize the participant involvement information, including a description of the activities undertaken and include any engagement materials provided. (See Appendix A1 – Participant involvement program guidelines and Appendix A1-B – Participant involvement program guidelines for Indigenous groups.).

A summary of the PIP, including a description of the activities undertaken and including any engagement materials provided is included in the PIP Report (Appendix D).

SP26 – Agency Consultations

Confirm that, if applicable, Alberta Transportation, the municipality in which the project is located, the applicable railway companies, and the owner of any registered and known unregistered aerodrome within 4,000 metres of the project boundary were consulted and provide a summary of any objections received, mitigations discussed, and any outstanding objections.

- A roadside development permit application has been submitted to Alberta Transportation and approval is expected in Q1 2024. All required setbacks have been adhered to.
- The nearest railway runs along the east side of the highway east of the Project and CP Rail was included in the PIP. No questions or concerns have been raised by CP Rail.
- The proposed Project is not located within 4km of a registered aerodrome and no unregistered aerodromes were identified within 4km of the Project during the PIP.

SP27 – Stakeholder List

List all occupants, residents and landowners on lands within the appropriate notification radius as shown below and described in Appendix A1 – Participant involvement program guidelines, as well as Indigenous groups, owners of aerodromes or other interested persons that were consulted as part of the participant involvement program.

A list of all occupants, residents and landowners on lands within the appropriate notification radius as described in Appendix A1 – Participant involvement program guidelines and other interested persons that were consulted as part of the participant involvement program is included in the PIP Report (Appendix D).

SP28 – Stakeholder Contact Information

Supply a list of contact information for all persons who had been contacted as part of the participant involvement program in a spreadsheet in accordance with the template included in Appendix A1 – Participant involvement program guidelines.

A list of contact information for all persons who had been contacted as part of the participant involvement program in a spreadsheet in accordance with the template included in Appendix A1 – Participant involvement program guidelines is included as Appendix M.

SP29 – Municipal Consultation

Summarize consultation with local jurisdictions (e.g., municipal districts, counties).

Consultation with Ponoka County is included in the PIP Report (Appendix D).

SP30 – Stakeholder Concerns

Identify all persons who expressed a concern(s) about the project. For each person, include the following information:

- **The specifics of the concern(s).**
- **Steps taken to try and resolve the concern(s).**
- **Whether the concern(s) was resolved.**

Details with respect to questions and concerns raised during the PIP are included in the PIP Report (Appendix D).

Interconnection Application

IC1 – Connection to the distribution system

Provide a statement that the local distribution facility owner has agreed to the interconnection, the legal subdivision (LSD) of the interconnection point, and an electric single-line diagram showing the interconnection point with the distribution facility owner.

A letter from the Distribution Facility Owner (DFO) FortisAlberta confirming they are willing to connect the Project and single-line diagram are included as Appendix G.

IC2 – Connection to the transmission system
Provide a statement from the ISO, at such time determined by the ISO, that endorses the interconnection and confirms that the interconnection will not result in adverse effects to the interconnected electric system.
Not applicable as this Project is connected to the distribution system.

Interim Information Requirements

Agricultural land

1. Using the current version of the Agricultural Regions of Alberta Soil Inventory Database (AGRASID), please describe the agricultural capability of soils intersecting the project footprint as provided in the spring-seeded small grains ("SSSGRAIN") attribute of the Land Suitability Rating System ("LandSuitabilityRatings") table. SSSGRAIN provides the Land Suitability Rating System (LSRS) classification for spring-seeded small grains for the related AGRASID soil polygons. Provide a table showing the amount of area for each LSRS class impacted by the project in hectares (e.g. 2.01 hectares of Class 2A).
See Section 6.2 of the Environmental Evaluation (Appendix F).

2. From the Agricultural Regions of Alberta Soil Inventory Database (AGRASID), please describe all soil series within the project area and report all potential material impacts to:

a. Soil quality (i.e. compaction, rutting, salinity, sodicity, fertility, contamination, clubroot)
See section 6.2 of the Environmental Evaluation (Appendix F).

b. Soil quantity (i.e. wind erosion, water erosion)
See section 6.2 of the Environmental Evaluation **(**Appendix F**).**

c. Hydrology (i.e. topography, soil drainage, depth to groundwater)
See section 6.2 of the Environmental Evaluation **(**Appendix F**).**

Describe how these material impacts to soil quality, quantity and hydrology will be adequately mitigated during construction, operation and reclamation.
See section 6.2 of the Environmental Evaluation (Appendix F) and the Environmental Protection Plan (Appendix IV of the Environmental Evaluation).

3. Describe all earthworks (e.g., stripping and grading) planned for the project, including the following information:

- **a. Methodology to anchor structures (e.g. screw piles, concrete footings, etc.).**
- **b. The extent of stripping and grading, with an estimate of the area of agricultural land impacted.**
- **c. Description of how these activities have been reduced in both extent and intensity (as practical) to protect the quality, quantity and hydrology of impacted soils.**
- **d. Description of how and where stripped soils will be stockpiled and what steps will be taken to preserve the quality and quantity of stockpiled soils prior to replacement on site.**
- **e. Description of how soils will be replaced on site to preserve the quality, quantity and hydrology of the disturbed soils.**

See section 6.2 of the Environmental Evaluation **(**Appendix F**).**

4. Describe the potential for co-locating agricultural activities (e.g. grazing, haying, crops, apiculture) into the project design. If co-locating agricultural activities is not feasible, please explain why.

Acestes Power is part of a group of family-owned companies that has been engaged in farming in Alberta for over 100 years. Our group was introduced to renewable energy when a third party reached out to us to lease some of our land for wind turbines. Like growing canola for biofuel, we viewed using the land for renewable energy production as an extension of our agricultural operation as opposed to an alternative to agriculture. As with all of our farming operations, we view co-locating agricultural operations at a solar facility as a way to maximize the production of the land.

We propose to co-locate sheep grazing and/or hay production on this solar facility. Within one year of the completion of construction of the facility we will plant a suitable perennial grass suitable for sheep grazing and feed hay. Then going forward during each growing season and into the fall each year, depending on conditions such as the availability of moisture at the site, we would either graze sheep on the site, harvest hay on the site, or both.

Alberta's main agricultural products are cereal grains, legumes, oil seeds, hay, and livestock. The industry standard equipment for the efficient production of cereal grains, legumes, and oil seeds are over 10 meters wide and wouldn't fit between the rows of panels in standard solar installations. In order to fit this standard equipment between the rows of panels the rows of panels would need to be wider, and as a consequence the footprint of the entire facility would need to be enlarged, disrupting more farmland.

Hay production and livestock grazing are more adaptable as a co-located agricultural use. As is the case when livestock are turned out on cropland after the harvest has been taken off or hay is cut on the dry corners of irrigated land, hay production and livestock grazing are more appropriate agricultural co-location strategies for solar facilities. The equipment used for hay production is smaller than that used for the production of cereal grains, legumes, and oil seeds, and smaller animals such as sheep can move around the solar panels without damaging the equipment.

5. List the qualifications of the agrologist(s) who prepared or reviewed the responses regarding agricultural land.

The qualifications of the agrologist who reviewed the responses regarding agricultural land is included in Section 9 of the Environmental Evaluation (Appendix F).

Municipal Land Use

1. Confirm whether the proposed power plant complies with the applicable municipal planning documents including municipal development plans, area structure plans, land use by-laws and other municipal by-laws.

The Project is located in Ponoka County and subject to the following municipal planning documents:

- Ponoka County Land Use Bylaw 7-08-LU (the LUB)
- Ponoka County Bylaw 6-08-MDP – the Municipal Development Plan (the MDP)

The Project falls outside of the Town of Ponoka Intermunicipal Development Plan. The MDP does not specifically discuss solar projects or renewable energy projects however it does indicate:

> **"**The future of Ponoka County lies with a strong farm economy, and Council will do whatever is necessary to support farming as an industry and as a way of life. Other land uses will be allowed only if they are compatible with farming and a clean environment**".**

Windmills Energy Conservation Systems (WECS) and Solar Power Arrays are defined together under section 623 of the LUB. The zoning of the Project lands is Agriculture General (AG) District and a WECS is a discretionary use in this district, however a solar power array is not listed as permitted or discretionary use in any district and Ponoka County may require a rezoning and will include a development permit application, which Acestes intends to file upon conclusion of the AUC process. All setbacks detailed in section 702 Agricultural (AG) District of the LUB have been adhered to, with the exception of one internal property line setback.

2. Identify any instances where the proposed power plant does not comply with applicable municipal planning documents and provide a justification for any non-compliance.
As noted in the response to part 1, the Project does not comply with the requirement to implement a 10m setback to any other property line, only in the case of the one internal property line. Not complying with the Setback for the property lines within the Project area is common amongst developers of multiple contiguous parcels. It does not have any detrimental effects on the County or its development standards, nor does it impact the Project's host landowners.

Acestes intends to seek a waiver of the setback for the property line within the Project area to better align with the proposed Project design and the practical reality of the layout of property lines in the context of the Project area.

3. Describe how the applicant engaged with potentially affected municipalities to modify the proposed power plant or to mitigate any of its potential adverse impacts to the municipality, prior to filing the application.
Please refer to the PIP Report (Appendix D) for further details on County consultation.

Viewscapes

1. List and describe pristine viewscapes (including national parks, provincial parks, culturally significant areas, and areas used for recreation and tourism) on which the project will be imposed. Describe mitigation measures available to minimize impacts from the project on these viewscapes.
Please refer to section 5.8 of the Environmental Evaluation (Appendix F).

Reclamation Security

1. Describe the reclamation security program for the proposed power plant, including details on:

a. **The standard to which the project site will be reclaimed to upon decommissioning.**
   Please refer to Section 7 of the Conservation and Reclamation Plan (Appendix V of the Environmental Evaluation (Appendix F)).

b. **How the amount of the reclamation security will be calculated.**
   Acestes had a reclamation cost estimate completed by a reputable engineering firm. Acestes communicated this with the landowner of the Project site and agreed on the security arrangements.

c. The frequency with which the reclamation security amount will be updated or re-assessed.
Acestes will re-assess the reclamation security amount once every seven and a half years following project commissioning date, which will be four times over an assumed 30-year project life.

d. When the reclamation security will be in place to be drawn upon, if needed.
Acestes will begin funding a reclamation security account at the start of project construction, which will be available to be drawn upon as needed.

e. What form the reclamation security will take (e.g., letter of credit, surety bond, other).
The reclamation security will be in the form of a letter of credit, bond, cash collateral or other security (in a form mutually acceptable to the landowner of the project site and Acestes).

f. The security beneficiaries to whom the reclamation security will be committed.
The security beneficiary to whom the reclamation security will be committed is the landowner of the project site.

g. How the beneficiary can access the security and any constraints on such access.
The Beneficiary's access to the security (including any constraints) will be determined in a manner that is mutually acceptable to the beneficiary and Acestes when the final form of the security (letter of credit, bond, cash collateral or other security) is to be executed, prior to start of project construction.