

Re: Recommendations for Enhancements to the Municipal Engagement Form for Renewable Energy Project Proposals

Dear Members of the Alberta Utilities Commission,

On behalf of the Kneehill County Council, I wish to address our concerns regarding Rule 007 and provide recommendations regarding the Draft Municipal Engagement Form intended for evaluating renewable energy plant proposals. Our council believes several enhancements to the Rule and the form are necessary to better address local interests, ensure meaningful engagement among all parties involved, and uphold the standards essential for community well-being.

1. Weight and Consideration of Municipal Planning Documents

- We advocate for an increased emphasis on municipal planning documents in the AUC's decision-making process. Specifically, clarification of the procedural steps the AUC will take if the Municipal Engagement Form indicates that a proposed project does not align with the Municipal Development Plan, Intermunicipal Development Plan, or Land-Use Bylaw are required. Furthermore, the form should ask whether an Area Structure Plan (ASP) exists for the project area and, if so, whether the project complies with it.
- We also suggest incorporating a section within the form requiring proponents to detail how their project aligns with the municipality's Strategic Plan. Clear guidelines should be provided on how projects align with these plans, including detailed explanations.

2. Contribution to Grid Stability

- It is imperative that the impact of renewable energy projects on the stability of Alberta's electricity grid be thoroughly assessed. Ensuring reliable energy provision should be a core consideration in the evaluation process.

3. Threshold for Coexistence with Agricultural Activities

- Clarification on the required threshold for renewable energy developments to coexist with agricultural activities is required. This includes a method for quantifying meaningful co-location and assessing the impact on agricultural activities within renewable energy power plants. The form should require proponents to outline methods for quantifying coexistence, and that coexistence should be robust enough to be meaningful (i.e.: more than just a few beehives and a handful of sheep/goats).

4. Reclamation Security Discussions

- Reclamation security discussions should involve provincial oversight to ensure adherence to decommissioning and reclamation standards. This oversight will ensure that proponents are accountable not only to the municipality but also to the

Province. Proponents should also demonstrate compliance with any municipal reclamation thresholds, when applicable.

5. *Mandatory Municipal Engagement Form*

- Proponents' mandatory completion of the Municipal Engagement Form is crucial. The approval process must require proponents to demonstrate alignment with municipal plans and the meaningfulness of their consultation efforts. The form should include a comprehensive description of consultation activities, particularly under the question, "Was the consultation conducted with the municipality?". Proponents should be accountable for addressing public interest and coexistence concerns, including weather, population density factors, collection lines, and traffic. Additionally, the form should provide sufficient time for municipal review and approval. In cases of disagreement, the AUC should prioritize the municipal perspective, given the municipality's comprehensive understanding of local policies.

6. *Monitoring and Oversight*

- Ongoing monitoring and oversight are essential to ensure compliance with agreed-upon standards for agricultural uses and other land activities. Proponents should engage with the municipality to discuss and outline how the AUC, as the approving authority, will provide adequate and ongoing monitoring and oversight

7. *Verification of Form Contents*

- After submission of the Municipal Engagement Form to the AUC, the County should be consulted to verify the form's contents. This is to ensure that concerns have been adequately reflected and not altered, and address any issues not listed. We recommend maintaining a "Municipal Concerns" section where proponents outline and address the municipality's concerns.

8. *Environmental and End-of-Life Considerations*

- We advocate for including considerations for environmental impacts, such as effects on soil quality, soil quantity, and hydrology. Additionally, the form should outline end-of-life considerations such as decommissioning, recycling, and responsible material disposal, as well as confirmation from the Province that these have been addressed.

9. *Equitability of Development Locations*

- We propose adding a section to the form that includes other considered sites and explains the rationale behind selecting the specific development locations, demonstrating equity in site selection decisions.

10. *Emergency Services and Municipal Standards*

- The form must include a comprehensive emergency services and incident mitigation section. It should detail how the proponent plans to address emergencies and how these plans comply with municipal standards and local community/environmental considerations.

11. Solar Glare Assessments

- We suggest employing a 25-degree field of view for local roads and a 50-degree field for highways, railways, and flight paths in solar glare assessments to evaluate potential impacts better.

We appreciate your consideration of these recommendations and look forward to engaging in a productive dialogue to enhance the Municipal Engagement Form and related processes.

Thank you for your attention to these matters.

Sincerely,

Kenneth King

Reeve, Kneehill County

cc: file