



Alberta Wilderness Association
"Defending Wild Alberta through Awareness and Action"

April 29, 2025

Alberta Utilities Commission
By email: engage@auc.ab.ca

RE: 007 Rule Feedback

To the Alberta Utilities Commission,

Alberta Wilderness Association (AWA) appreciates the opportunity to provide comments on the blackline draft of Rule 007: *Facility Applications*. Founded in 1965, AWA strives to help Albertans understand the intrinsic values that wildlife and wilderness provide and encourage communities to participate in conservation initiatives that will ensure a legacy for future generations. With over 7,500 members and supporters in Alberta and beyond, AWA is dedicated to conserving Alberta's wilderness.

The document incorporated changes to agricultural land requirements, municipal feedback, reclamation security, and visual impact assessments that reflect recent government decisions. Some of these decisions arose from the Renewable Energy Development on Agricultural Land survey, the results of which have still not been released. The document also alters some of the terminology and requirements of submissions.

We appreciate that these changes are intended to align with the decisions made by the provincial government. However, we oppose these restrictions being applied only to renewable energy developments, and not other energy developments, including oil and gas, which research finds have much greater and more extensive environmental impacts¹. While we appreciate the need to balance protection of environmentally sensitive and agriculturally important lands with development, these restrictions will not be effective if not applied across all industries, and will serve only to hinder Alberta's economic growth and harm our energy future. We ask the results of the Renewable Energy Development on Agricultural Land survey be posted publicly and the justification behind these decisions explained.

We appreciate the additional requirements targeted at energy storage safety, particularly around monitoring and air dispersal. Alberta has trailed other regions in establishing energy storage safety standards. We suggest also explicitly considering water dispersal, particularly where energy storage facilities are developed near surface water or at risk of contaminating groundwater.

We are also strongly in support of including "other occupants or interest holders not listed on land title" in consultations, and throughout the application and development process. Impacts of industrial developments can have far-reaching effects, impacting more than landowners in the immediate vicinity.

¹ Jones, N. F., & Pejchar, L. (2013). Comparing the ecological impacts of wind and oil & gas development: a landscape scale assessment. *PLOS one*, 8(11), e81391;
Horsch, Caitlyn. 2023. The Canada Grassland Protocol: A Background. Available at:
https://www.canadianfga.ca/uploads/source/Amber/GrasslandProtocol-CGP_Final_Web.pdf.

Applicants should not only be encouraged to consider other interested parties, this needs to be a requirement. We appreciate the acknowledgement of stakeholders beyond those listed on land title, although urge for greater inclusion of all interest groups in considering impacts of renewable energy and other developments throughout the process.

Thank you for considering our comments.

Sincerely,

ALBERTA WILDERNESS ASSOCIATION

A handwritten signature in black ink that reads "Ruiping Luo". The signature is written in a cursive, flowing style.

Ruiping Luo
Conservation Specialist