

Electronic Notification

November 30, 2010

APPLICATION NO. 1606609
PROCEEDING ID. 457

**ALBERTA UTILITIES COMMISSION RULING ON ISSUES SET OUT IN DECISION
2010-523**

1 OVERVIEW AND NATURE OF THE ISSUE TO BE DECIDED

1. On November 8, 2010, the Alberta Utilities Commission (AUC or Commission) released Decision 2010-523. In that decision, the Commission requested that certain persons provide further information about whether they had rights that may be directly and adversely affected by the Commission's decision on this application. The Commission required this information in order determine whether those persons would have standing to participate in this proceeding.

2. The Commission established the following process schedule to receive this information:

- (1) Written submissions had to be submitted on or before November 15, 2010; and
- (2) The applicants (as defined below) were entitled to respond on or before November 22, 2010 to the written submissions.

3. In this ruling the Commission will decide whether certain parties have rights that may be directly and adversely affected by the Commission's decision on the application.

2 BACKGROUND

4. On September 27, 2010, AltaLink L.P. (AltaLink) and EPCOR Distribution & Transmission Inc. (the applicants) jointly filed an application with the Alberta Utilities Commission (AUC or Commission) requesting approval to construct and operate the Heartland Transmission Project (Heartland project).

5. On October 1, 2010, the Commission issued a notice of application and process meeting. The process meeting was held on November 2, 2010 before a Commission panel comprised of Willie Grieve (Chair) and Commissioners Anne Michaud and Tudor Beattie, Q.C.

6. Interested persons were invited to make a brief appearance before the Commission at the process meeting to identify their interest in the application, their intended scope of participation,

the issues relevant to the application, and to comment on the preliminary process schedule circulated by the Commission as part of its notice.

7. On November 8, 2010, the Commission issued Decision 2010-253. In that decision the Commission set a process schedule for how it would hear the application for the Heartland project and also granted standing to certain persons to participate in the Commission's proceeding. The Commission granted standing to persons that demonstrated they had rights that may be directly and adversely affected by the Commission's decision on the application.

8. The Commission established the process set out in paragraph 2 above to gather further information from persons that failed to demonstrate that their rights may be affected by the Commission's decision.

9. The Commission required further information from the following persons:

- a) ATCO Electric Ltd. (ATCO);
- b) The Industrial Power Consumers Association of Alberta (IPPCA);
- c) ENMAX Power Corporation (ENMAX);
- c) NOVA Chemicals Corporation (NOVA);
- d) Westboro Parents Group;
- e) Mr. Graves;
- f) Alberta Direct Connect Consumer Association (ADC);
- g) UCA; and
- h) individuals listed on schedule "C" and "D" of Decision 2010-523. These individuals indicated that they did not reside or own land within 800 metres of the edge of the right of way on either the preferred route, or the alternate route, and individuals that did not provide sufficient information for the Commission to determine how they may be affected by the Commission's decision on the application.

10. The Commission specifically requested that IPCAA and the ADC address Alberta Energy and Utilities Board Decision 2006-120. That decision dealt with standing for persons asserting so-called "ratepayer" interests in an application for Alberta Energy and Utilities Board approval to construct and operate a 500kV transmission line from Genesee to Langdon.

11. The Commission received further information from ATCO, IPCAA NOVA, the UCA and Mr. Graves and certain individuals about how their rights may be directly and adversely affected by the Commission's decision.

12. On November 22, 2010, AltaLink responded to these submissions.

13. The Commission did not receive further information from ADC, ENMAX or the Westboro Parents Group, among other persons.

3 DISCUSSION OF ISSUES

14. Each of the submissions received by the Commission is summarized in the paragraphs that follow.

3.1 Views of ATCO

15. ATCO asserted that it has statutory obligations under the *Hydro and Electric Energy Act*, the *Electric Utilities Act* and the *Transmission Regulation*. ATCO said that a number of its rights and obligations under these enactments will be affected in general, and specifically, in regard to critical transmission infrastructure. ATCO argued that its legislative rights and obligations as a transmission facility owner provide a foundation for the rights it will assert and may be affected by the Commission's decision on the application.

16. ATCO noted that it will apply for Commission approval of a critical transmission infrastructure project in the near future. This project, ATCO noted, includes facilities that will be connected to facilities that are part of the Heartland project. Accordingly, ATCO argued that its rights may be directly and adversely affected by the Commission's decision on the application.

3.2 Views of IPCAA

17. IPCAA argued that it should be granted standing on two grounds; first as a ratepayer and second because some of its members will be affected by the Commission's decision on routing.

(i) Ratepayer interests

18. IPCAA argued that the Commission's decision on how and where the transmission line is constructed could have major cost implications for its members. IPCCA noted that decisions about route (preferred or alternate), towers (monopole or lattice) and construction method (above or below ground) will each have a significant effect on the cost of the Heartland project and may affect IPCAA's members business and pipeline operations. IPCAA argued that this proceeding is the only venue for it to review the merits of these alternatives.

19. IPCAA argued that, in the normal course, it could have raised the issue of the cost implications for this project at the needs identification document proceeding (NID proceeding). However, since this project deals with critical transmission infrastructure, and no NID proceeding was convened, this proceeding provides the only venue for IPCAA to raise these issues with the Commission. IPCAA argued that the 500 kV facility hearing leading to Decision 2006-120 followed a NID proceeding and, as such, this proceeding can be distinguished from Decision 2006-120 on that basis. IPCAA also argued that options before the Board in the 500 kV facility application did not include alternatives with significant cost differences.

(ii) Landowner interests

20. IPCAA reiterated that its members have pipelines and facilities that may be directly and adversely affected by the Commission's selection of a particular route. IPCAA declined to disclose to whom it was referring because IPCAA has a long standing policy of confidentiality for its members and thus IPCAA indicated that it would only disclose its membership confidentially.

3.3 Views of NOVA

21. NOVA indicated that it is the license holder and/or operator of four pipelines located in the transportation and utility corridor and argued that its rights may be directly and adversely affected on this basis.

3.4 Views of Mr. Graves

22. Mr. Graves indicated that he represents a group. Mr. Graves invented the acronym FIRST to assist in describing this group. He said:

F stands for First Peoples
IR stands for Indian Reserves
ST stands for Street

F First Peoples, there are 44 000 First Nations people living in Edmonton, Graves has received instructions from representatives that are members of this group to participate in this proceeding, Graves will provide a list of Signatures to the Commission reflecting who these people are.

IR Graves is developing positions with various First Nations and will present these to the Commission as they materialize. Letters on Band letter head will be provided.

ST There are many First Nations people that are facing life on the street, situations of homelessness and ill health, as a consequence of similar development projects. Graves in collaboration with community partners has the objective of mitigating the impact this project will have. The impact of similar projects that strip from their land have severe negative impacts particularly youth under 25, many end up living on the street resulting in poor health and increased risk of incarceration. While six percent of Canada's population is First nations and Métis they already account for 70 % of the homeless population. Graves is seeking to make whatever representations it can on what would otherwise be an invisible population. People living on the street face a higher than average risk of homelessness, incarceration and mental illness.

23. Mr. Graves asserted that FIRST has standing because First Nations have rights under section 35 of the *Constitution Act* and Supreme Court of Canada jurisprudence. Mr. Graves said that First Nations have the right to exercise and enjoy their culture, ceremonies, hunting, fishing and gathering in support of their culture. Mr. Graves asserted that the preferred route affects 6000 acres of crown land and that first peoples have rights on these lands and that the Heartland project may directly and adversely affect those rights.

3.5 Views of the UCA

24. The UCA stated that it registered as a participant in the proceeding because of its statutory responsibilities. The UCA stated that it intends only to monitor the proceedings. It noted that it has representation on the transmission facilities cost monitoring committee and is comfortable at this time with its monitoring role.

3.6 Views of individuals

25. The Commission received further information from the following individuals:

- (1) Murray Leroy Speer, Morris and Evelyn Presisniuk, Dennis Makowecki, Donald and Lynda Spence, Edward and Pittman, Leslie Hall on behalf of Lois Hall. Each of these individuals is represented by Putnam and Lawson, Barristers and Solicitors;
- (2) Helen Reeder and Dave Conroy;
- (3) Ingrid Larsen and Jorgen Danielsen;
- (4) Tam Anderson;
- (5) Nick Kozak and Kathy Kozak;
- (6) Walter and Linda Hoffman;
- (7) James Hoffmeyer;
- (8) Keith Wilson of Wilson Law office on behalf of:
 - i. Karen, Stuart, Kevin and Erin Shaw;
 - ii. Rob Shaw;
 - iii. James, Sandra and Blaine Shaw;
 - iv. Vivian and Eric Lesperance; and,
 - v. Colleen Lane.

Each of these individuals (with the exception of Mr. Wilson who wrote on behalf of his clients) indicated that they that own or reside on land within 800 metres of the edge of the right of way for the preferred or alternate route.

3.7 Views of Area Council 17

26. The Commission received information from Area Council 17. Area Council 17 does not disagree with the Heartland project but very strongly supports the burying of the transmission line through residential areas. Area Council 17 submitted that underground cables provide obvious environmental benefits versus over-head lines in terms of land use, visual impact, property valuation, and tourism.

3.8 Views of AltaLink

27. AltaLink did not object to standing for ATCO, NOVA and individuals that own or reside on land within 800 metres of the edge of the right of way on the preferred or alternate route. AltaLink stated that it did not believe standing was necessary for parties that intend to monitor proceedings and did not object to the UCA's proposal to monitor this proceeding.

28. AltaLink argued that IPCAA's participation in other applications related to rate matters and not facility matters. AltaLink repeated its concern that if IPCAA were to have standing to participate in this proceeding on the basis that it is a ratepayer, then every ratepayer in Alberta would also have standing. AltaLink argued that IPCAA does not need to provide its full membership list but must identify the entities it represents in this proceeding.

29. AltaLink stated that there was no basis upon which to grant standing to FIRST. AltaLink argued that there is no evidence before the Commission that Mr. Graves is representing anyone whose rights may be directly and adversely affected by the application.

30. AltaLink requested the Commission clarify what it meant in paragraph 35 of Decision

2010-523. There, the Commission requested that "individuals wishing to participate in this

proceeding, over and above their participation as members of a group, identify the scope of their individual participation."

31. Finally, AltaLink assumed that parties that did not respond to the Commission by November 15, 2010 will not be granted standing in this proceeding.

4 COMMISSION RULING

32. In issuing this ruling, the Commission has considered all relevant materials comprising the record of this proceeding. Accordingly, references in this ruling to specific parts of the record are intended to assist the reader in understanding the Commission's reasoning relating to a particular matter and should not be taken as an indication that the Commission did not consider all relevant portions of the record with respect to that matter.

33. This ruling is structured as follows: first, the Commission provides an overview of its ruling; second, the Commission discusses provisions of the *Alberta Utilities Commission Act* and a decision of the Alberta Court of Appeal relevant to this ruling; third, the Commission provides reasons for its ruling; fourth, the Commission comments on persons that provided insufficient information to substantiate their standing to participate in this proceeding and deals with other matters.

4.1 Overview of the Commission's Ruling

34. The Commission finds that NOVA, as an operator or licensee of a pipeline, and individuals that own or reside on land within 800 metres of the edge of the right of way on the

preferred or alternate route, have standing to participate in this proceeding on the basis that their rights may be directly and adversely affected by the Commission's decision on the application.

35. The Commission finds that ATCO has standing to participate in this proceeding on the basis that ATCO has been designated as an entity to bring a critical transmission infrastructure that may connect with the Heartland substation. This right may be directly and adversely affected by this application and in particular how and where the Commission orders the applicants to construct the proposed Heartland substation.

36. The Commission will allow the UCA to monitor this proceeding.

37. Attached to this ruling the Commission provides an updated list of persons with standing in this proceeding. The Commission has underlined names of persons that have been added to the list that was circulated as schedule "B" to Decision 2010-523. In this ruling, the Commission will not further discuss the standing of NOVA, ATCO, the UCA and individuals now set out on attached updated list of persons with standing.

38. The Commission finds that FIRST does not have standing to participate in this proceeding.

39. The Commission finds that IPCAA has standing in this proceeding subject to the conditions set out below.

4.2 Legal test to obtain standing before the Commission

40. Standing before the Commission is determined by subsection 9(2) of the *Alberta Utilities Commission Act* which states:

(2) If it appears to the Commission that its decision or order on an application may directly and adversely affect the rights of a person, the Commission shall

(a) give notice of the application in accordance with the Commission rules,

(b) give the person a reasonable opportunity of learning the facts bearing on the application as presented to the Commission by the applicant and other parties to the application, and

(c) hold a hearing.

41. In *Cheyne v. Alberta (Utilities Commission)*, the Alberta Court of Appeal characterized section 9(2) as the equivalent of section 26(2) of the *Energy Resources Conservation Act* and confirmed that the two-part test for standing under section 26(2) applies to subsection 9(2). The Court described that test as follows:

...s. 26(2) has two branches. First is a legal test, and second is a factual one. The legal test asks whether the claim right or interest being asserted by the person is one known to the law. The second branch asks whether the Board has information which shows that the application before the Board may directly and adversely affect those interest or rights. The second test is factual.

In the following section the Commission will apply this test to IPCAA and then to FIRST.

4.3 Reasons for the Commission's Ruling

4.3.1 IPCAA

42. The Commission finds that IPCAA has standing on the basis that the rights of one or more of its members may be directly and adversely affected by the Commission's decision on the application. The rights of seven IPCAA members may be directly and adversely affected because they own pipelines or facilities that may be affected by the Commission's decision on routing for the Heartland project.

43. IPCAA's standing is conditional. On or before December 2, 2010 IPCAA must:

- (a) identify which of its members have pipelines or facilities that may be directly and adversely affected by the Commission's decision on routing;
- (b) identify the location(s) of the affected pipelines or facilities; and
- (c) confirm that IPCAA is authorized to represent the interests of one or more of those members identified in sub-paragraph(a).

44. IPCAA does not have to provide a list of all of its members' names. If, however, IPCAA believes that identifying one or more of these members requires confidentiality, IPCAA may apply to the Commission pursuant to section 13 of *AUC Rule 001: Rules of Practice* for a confidentiality order.

45. The Commission heard limited argument from IPCAA about its standing based upon its right as a ratepayer. Lacking from IPCAA's submission, in the Commission's view, was a description of the right it was asserting in support of its request for standing under section 9(2) of the *Alberta Utilities Commission Act*. Further, the Commission was not persuaded by IPCAA's submission that the rate implications of the Heartland project may directly and adversely affect a right referred to in section 9(2) of *Alberta Utilities Commission Act*.

46. The Commission also rejects IPCAA's argument that it should be granted standing in this proceeding because it has been granted standing in other proceedings involving the applicants. In the Commission's view, those other proceedings involved matters related to rates and tariffs and are not analogous to this application.

47. Nevertheless, the Commission would have allowed IPCAA to participate in this proceeding if IPCAA asked the Commission to exercise its discretion to allow IPCAA to do so although IPCAA's rights may not be directly and adversely affected by the Commission's decision on this application. The Commission would have permitted IPCAA to call evidence, cross examine witnesses and submit argument. In this regard, section 9(2) of the *Alberta Utilities Commission Act* does not restrict the persons that may participate in Commission proceedings. That section compels the Commission to grant standing to persons whose rights may be directly and adversely affected by the Commission's decision on an application. The section does not restrict the Commission's authority to allow additional persons to participate in Commission proceedings.

48. The Commission has implicit authority to allow persons whose rights may not be directly and adversely affected by the Commission's decision on an application to participate in its process. The Commission's implicit authority comes from its ability to control its own procedure which flows from the Commission's authority to hold and conduct hearings pursuant to the *Alberta Utilities Commission Act*.

49. Provisions of the *Alberta Utilities Commission Act* relevant to the Commission's authority are as follows:

- (a) Part 2 of the *Alberta Utilities Commission Act* deals with the conduct of Commission hearings. Section 13 of that part enables a division of the Commission to conduct hearings that the Commission may conduct under the *Alberta Utilities Commission Act* or other enactments.
- (b) Section 8 of the *Alberta Utilities Commission Act* confers authority upon the Commission to do all things that are necessary for or incidental to the exercise of its powers and the performance of its duties and functions.
- (c) Section 11 of the *Alberta Utilities Commission Act* is to similar effect as section 8. Section 11 confers upon the Commission all the powers, rights, privileges and immunities that are vested in a judge of the Court of Queen's Bench for all matters necessary or proper for the Commission to exercise its jurisdiction or carrying any of its powers into effect.
- (d) Section 76(1)(e) of the *Alberta Utilities Commission Act* enables the Commission to make rules of practice governing the Commission's procedure at hearings.

50. The Commission's authority to allow persons whose rights may not be directly and adversely affected by the Commission's decision on an application to participate in its proceedings is necessarily incidental to the Commission's express power to hold hearings and determine how hearings are conducted pursuant to the provision of the *Alberta Utilities Commission Act* set out above. Such persons may participate in the Commission's process at the Commission's discretion. The Commission's implicit authority is reflected in court decisions that recognize that administrative tribunals with the power to hold hearings have discretion to allow persons to participate in the tribunal's hearing process.¹

51. Persons may have relevant information that may assist the Commission in carrying out its duties or functions although those persons' rights may not be directly and adversely affected by the Commission's decision on an application. IPCAA represents significant customers of electricity and could provide relevant information on a number of issues unique to this proceeding. For example, IPCAA could provide relevant information about how the cost of the transmission alternatives proposed by the applicants affects the Commission's public interest determination under section 17 of the *Alberta Utilities Commission Act*.

52. This issue arises in this proceeding because:

¹ *Canada (Combines Investigation Act Director of Investigation & Research) v. Newfoundland Public Telephone Co.*, [1987] 2 S.C.R. 466 at para. 16; *Society of Composers, Authors and Music Publishers of Canada v. Canada (Copyright Board)*, [1993] F.C.J. 137 at pg. 16.

- (a) The Heartland application is the first critical transmission infrastructure project reviewed by the Commission;
- (b) The transmission alternatives proposed by the applicants differ in how much they cost. The applicants estimate that the least expensive alternative will cost \$580 million with an accuracy of between plus 20 percent and minus 10 percent whereas they estimate that the most expensive alternative will cost \$1.09 billion with an accuracy of plus 30 percent and minus 30 percent; and
- (c) In the absence of a statutory needs assessment, the only venue for IPCAA to comment on the cost of transmission alternatives proposed by the applicants is this proceeding.

4.3.2 FIRST Group

53. The Commission finds that the “FIRST” group does not have standing to participate in this proceeding. Mr. Graves provided no information about the people he says he represents. Thus, it is unclear who he represents, what rights those (unidentified) persons may be asserting or how those rights may be directly and adversely affected.

4.3.3 Persons that provided insufficient information and other matters

54. AltaLink assumed that parties that did not respond to the Commission by November 15, 2010 will not be granted standing in this proceeding.

55. The Commission confirms that the only persons with standing in this proceeding are those persons set out on the updated list of persons with standing, which is attached to this ruling. In this regard, the Commission finds that Area Council 17 provided insufficient information for the Commission to determine whether Area Council 17 has standing. In any event, it is unclear from the council’s submission whether it intends to participate further in this proceeding.

56. Inasmuch as AltaLink assumes that in the future a person will not be granted standing, AltaLink’s assumption is contrary to section 27 of *AUC Rule 001: Rules of Practice*. Under section 27, a person may request leave to file a document or file a submission as an intervener, after the time limit set out in the notice of hearing has elapsed.

57. AltaLink requested that the Commission clarify paragraph 35 of Decision 2010-523. The Commission does not believe that paragraph 35 requires clarification. The Commission asked individuals that wished to participate in this proceeding, over and above their group participation, to identify the scope of their individual participation. In this regard the Commission notes AltaLink’s request at the pre-hearing meeting:

(...) There are a number of interveners that have intervened on their own and are members of groups, and it would be helpful in my submission, to the process if it could be indicated what the scope of representation is; in my submission not only for the issue of standing, but also later on when you’re considering the issue of costs and funding and budgets, et cetera.

58. The Commission notes as of this date it has not received a submission from a person with standing in response to paragraph 35 that indicates they intend to participate in this proceeding both individually and as a member of a group.

Dated In Calgary, Alberta on November 30, 2010

ALBERTA UTILITIES COMMISSION

(original signed by)

Willie Grieve
Chair

(original signed by)

Anne Michaud
Commission Member

(original signed by)

Tudor Beattie, Q.C.
Commission Member

UPDATED LIST OF PERSONS WITH STANDING

1067215 Alberta Inc.	Chedzoy, Bruce / Chedzoy Farms
Agrium Products Inc.	Chemello, Gabriel
Allison, Lauraine and John	Choney, Delilah
<u>Anderson, Tam / Prairie Gardens Adventure Farm</u>	Cole, Melvin and Barb
Apps Eccles, Karena	Collin, Ken E.
Armstrong, Donna C.	Conroy, Dan F.
Armstrong, Murray J.	<u>Conroy, Dave</u>
<u>ATCO Electric Ltd.</u>	Craig, William D.
Bacham, Chris	Crighton, Douglas and Colleen
Belisle, Victor S.	Dambrowsky, Kevin
Blackland Ranches Inc.	<u>Danielson, Jorgen</u>
Bokenfohr, Terry	Dargatz, Larry and Gail
Bossio, Angelo	Day, Maya
Bowes, Joan	de Goeij, Glenn and Konni
Boyd, Andrew	Doll, Carrie
Bradley, Bryan	Duggan, Dana
Bradley, Connie	Durnin, Beverly / Aspen Valley Farms
Brass, Jan	Elden, James
Brokofsky, Dallas and Patricia	Ewanchuk, Lawrence and Sylvia
Burns, Jill	Fabing, Winston
Burrowes, Lloyd	Fluker, Richard and Toni
Callihoo, Laurie, Wilfred and Gladys	Fouillard, Philip and Diane
Camp, Richard	Fowler, Brenda
Charbonneau, Denise and Ron	Freer, Judy

Gadallah, Adel	Hurford, Pauline
Gagnon, Ella	<u>Industrial Power Consumers Association of Alberta</u>
Garritty, Marie-Jeanne and Grant	Jacula, Terry and Stacey
Ghost Rider Farms Inc.	Jankovic, Marija
Gignac, Denis	Jansen, Patricia
Gloczin, Dan	Jobs, Gillian / A & D Daycare Centre
Gough, Maureen	Jobs, Jason and Gillian
Gushuliak, Kara	Johnson, Bruce
<u>Hall, Leslie on behalf of Lois Hall</u>	Johnson, Shirley
Hardy, Debra	Kane, Stacy
Harneth, Brenda	Karpala, Joseph
Harris, Dr. Ross	Kassian, Leon
Herrewynen, Don and Deb	King, Herb D.
Hesse, Karen	Kiwi Landscaping (1983) Inc.
Hittinger, Raymond and Lydia	Koehn, Richard
Hodge, Joe	<u>Kozak, Nick and Kathy</u>
Hodgson, Sandra	Krewenchuk, Kelly
Hoffman, Gene	Krulicki, Aaron & Lisa
<u>Hoffman, Walter and Linda</u>	Kuchmak, Lyle
Hoffmeyer, James	Kuzio, Wayne and Dawn
Hogan, James	L'Hirondelle, Florence
Holley, Donna	Lamoureux, Claude and Priscilla
Holowaty, William	<u>Lane, Colleen</u>
Hunt, Bruce	Lardner, Bertha
Hunter, Edda and Dr. E.G. / A & D Daycare Centre	<u>Larson, Ingrid</u>
Hurford, Jack	Lema, Andre

Lema, Trish

Lespearance, Eric and Vivian

Loren, David K.

Lorenz , Dave and Ingrid

Lorenz, Michael and Teri

Losinski, Margaret

Lynes, Elan and Dave

MacGregor, Janet

Mack, Linda

Makowecki, Dennis

Maisonneuve, Pauline

Malboeuf, Wendy

Marles, Alissa

Masley, Mike and Judy

McCullough, Rob and Jennifer

McFadyen, Scott

Mcleod-Wielens, Marion

Meier, Kelly

Meier, Wendy

Melin, Jo-Lynn Faith

Melnyk, Jennifer

Melnyk, Kevin

Mertz, Fred

Michalczyk, Richard and Michelle

Miller, Greg

Milward, Peter

Moran-Simbirski, Michlyn

Munro, Murray and Alison

Nanji, Amin

Newstead, Andrew

Nichols, E. Marilyn

Nichols, Richard E.

Nikiforuk, Blair

Nikiforuk, Lori

Nikiforuk, Nicholas

NOVA Chemicals Corp.

Nurse, Chris

Oliver, Greg and Laurie

Pandya, Satish and Indira

Parry, Brian Robert

Payment, Dreena

Pedersen, Carol

Petasky, Stephen

Pittman, Edward and Joyce

Place, Trevor

Polendnik, Marianne

Presisniuk, Morris and Evelyn

Procinsky, William / Aspen Valley Farms

Pound, Joe

Price, David

Prins, James G. and Michelle M.

Quinn-Kucy, Gerri

Randa, Rita	Surgenor, Jacquie
<u>Reeder, Helen</u>	Sush, Geraldine
Regula, Les	Sustrik, Gordon
Reimche, Darryl and Donna	Susun, Ferit
Russell, Wendy	Swane, Doug and Shirley
Rutten, Leonard	Tamm, Ernst
Shudra, Gary	Tan, Ella
Shudra, Diane	Tan, Kristopher
Sitler, Glenn and Edith	Tilley, Barry E.
<u>Shaw, Karen, Stuart, Kevin and Erin</u>	Tilley, Sharon
<u>Shaw, Rob</u>	Total E & P Canada Ltd.
<u>Shaw, James, Sandra and Blaine</u>	Tubertech Enterprises Ltd.
Slupek, D.L.	Van der Merwe, Marion
Smith, Jason and Tracy	Veldman, Mark
Smith, Stephen J.	Verheul, Michiel
Sobey, Dr. Alan	Viegas-Fleck, Michelle
Sobey, Robina	Waite, Calvin
Soetaert, Elaine	Walker, John McLeod
Soetaert, Martin	Walton Development and Management Inc. as agent for and on behalf of Walton International Group Inc. and Walton International group (SK) Inc.
Souliere, Patrick	Watrin, Lee
<u>Speer, Murray Leroy</u>	West, Paul and Marianne
Speidel, Barbara	Whipple, Colin
Speidel, Robert	Wielens, Paul
<u>Spence, Donald and Lynda</u>	Wilson, M.L. (Lynne)
Stiegelmar, Robert	Wolbeck, Larry and Norma

Woodman, John

Yasinko, Lisa

Zapisocki, Darrell T.

Zapisocki, Jody

Zapisocki, Zoey

Zavitz, Ronald

Ziegler, Jodie