

Environmental Guidelines Checklist

Stakeholder: Alberta Environment & Parks (Brian Lambert), AltaLink, ATCO Electric, EPCOR
Distribution & Transmission (EDTI)

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Development of New Transmission Lines		<p>1) Have you provided a description of the existing (i.e. pre-construction) environmental and land use conditions in the assessment area¹?</p> <p><u>Footnote 1:</u> The assessment area is the area within which the project has potential direct or indirect environmental effects. The assessment area will vary from project to project depending on existing environmental conditions and which environmental components (e.g. wildlife, vegetation, wetlands, soils, surface water, aquatic resources) are being affected by the project. In accordance with Alberta Environment and Parks guidelines, the assessment area is measured from the edge of all disturbances associated with the project, including the proposed right-of-way,</p>		<p>AltaLink: 1) refers to the term "assessment area". Although this term is defined in the Draft Environmental Checklist which mentions the "Alberta Environment and Parks Guidelines", it is not clear where this definition originated. AltaLink is not aware of its use in any AEP guideline or in AUC Rule 007. The AUC appears to be basing its definition of assessment area on wildlife setback values however, AltaLink is unclear about what occurs in a scenario where no wildlife setbacks apply. Also it is unclear what would occur if different setbacks occurred in different locations on a transmission line.</p>	<p>The term "assessment area" was developed by AUC staff with an expectation that an assessment by the applicant of all relevant environmental factors will be undertaken. Upon further review, the AUC considers that the term "local study area" would align with AEP's "Environmental Assessment Program: Glossary of Environmental Assessment Terms and Acronyms Used in Alberta Updated February 2010" document. In areas where there are no relevant potential wildlife setbacks, the applicant is expected to review any relevant environmental aspects for the area and assess them accordingly. Variations in setback distances should be assessed in accordance with terrain variations using the worst case scenario if in doubt.</p> <p>To avoid misunderstanding on the applicant's part and the confusion of AEP wildlife</p>

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		temporary and permanent access roads, construction work space and work camps. For example, for a transmission line project within an area where raptors are present or potentially present, an assessment area of a minimum of 1000 m from the edge of all disturbances would be appropriate.			setbacks with local study area boundaries, AUC will delete the last line of footnote no. 1, which states "For example, for a transmission line project within an area where raptors are present or potentially present, an assessment area of a minimum of 1000 m from the edge of all disturbances would be appropriate."
				ATCO Electric: "Assessment Area": ATCO Electric is requesting additional clarification as to the definition of the "Assessment Area" referred to in questions 1, 2 and footnote no.1. Please identify under which AEP guidelines the definition of the term "Assessment Area" was established. This comment also applies generally to the Guidelines/Checklist for Substation Developments and corresponding modification flowcharts. There are multiple instances throughout the documents which reference "AEP guidelines" without defining which guidelines are being referred to. This clarity is required in order to understand AUC expectations; all AEP guidelines referenced should include the formal title.	The term "assessment area" was developed by AUC staff with an expectation that an assessment by the applicant of all relevant environmental factors will be undertaken. Upon further review, the AUC considers that the term "local study area" would align with AEP's "Environmental Assessment Program: Glossary of Environmental Assessment Terms and Acronyms Used in Alberta Updated February 2010" document. Without restricting the requirement for the applicants to be familiar with and incorporate all AEP guidelines, the AUC has endeavoured to include the relevant references.
		2) Have you provided		ATCO Electric:	The term "assessment area"

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		maps showing the most relevant environmental features, habitat, ecological communities, sensitivities, units, zones, protected areas, and designations present in the assessment area?		" Assessment Area ": ATCO Electric is requesting additional clarification as to the definition of the "Assessment Area" referred to in questions 1, 2 and footnote no.1. Please identify under which AEP guidelines the definition of the term "Assessment Area" was established. This comment also applies generally to the Guidelines/Checklist for Substation Developments and corresponding modification flowcharts. There are multiple instances throughout the documents which reference "AEP guidelines" without defining which guidelines are being referred to. This clarity is required in order to understand AUC expectations; all AEP guidelines referenced should include the formal title.	was developed by AUC staff with an expectation that an assessment by the applicant of all relevant environmental factors will be undertaken. Upon further review, the AUC considers that the term "local study area" would align with AEP's "Environmental Assessment Program: Glossary of Environmental Assessment Terms and Acronyms Used in Alberta Updated February 2010" document. Without restricting the requirement for the applicants to be familiar with and incorporate all AEP guidelines, the AUC has endeavoured to include the relevant references.
		4) Have the locations and management plans for the expected new permanent access roads and temporary workspace requirements been identified and included in the assessment for the project?		AltaLink: 4) asks whether new permanent roads and temporary work spaces have been identified. Altalink often does not plan temporary workspace until the construction phase of the Project, when further engineering design has been completed and therefore the specific requirements of the workspace are known. Altalink	The goal of the applicant considering access roads and workspace requirements it to ensure that the applicant has assessed the full impact of the alternatives in its project assessment and routing recommendations. Temporary workspace requirements may be of significant size and impact potentially requiring site disturbance and clearing,

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				is concerned that in 4) of this section the Commission is suggesting that it wishes to approve all temporary workspaces which would be a significant change from Altalink's understanding of current practice.	therefore, the AUC expects that they will be at least conceptually identified in the application.
		6) Have you described how the environmental assessment was conducted and the potential effects (before mitigation) and residual effects (following mitigation) of the project on the environment, including, as applicable, adverse effects to soils and terrain, groundwater, surface water, vegetation, wetlands, wildlife, fish, terrestrial and aquatic habitat, and land use?		AltaLink: 6) asks whether the proponent has conducted an "environmental assessment" however the language of AUC Rule 007 uses the term "environmental evaluation". Altalink submits that the reference in this section should be changed to "environmental evaluation" throughout the document to reflect AUC Rule 007 and avoid confusion.	The AUC agrees that consistent terminology should be used. The term environmental evaluation will be used. For clarity the AUC considers that environmental evaluation is defined as follows: Environmental Evaluation – an environmental evaluation describes and predicts a project's effects on the environment before the project is actually carried out, and the measures to avoid, mitigate or compensate for the project's predicted adverse environmental effects. The purpose of an environmental evaluation is to ensure that enough information is provided by the applicant to inform the public and government agencies about the applicant's understanding of the consequences of their project, and to help the AUC determine if the project is in the public interest. Typically, an environmental evaluation should:

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					<ul style="list-style-type: none"> • describe the present (pre-project) environmental conditions in the local study area (insert footnote 1); • identify and describe the project activities and infrastructure that may adversely affect the environment; • identify what 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 may be adversely affected by the project; • describe the potential adverse effects (both direct and indirect) of the project on the ecosystem components during the life of the project

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					<p>(insert footnote 2);</p> <ul style="list-style-type: none"> • describe the mitigation measures the applicant proposes to implement during the life of the project to reduce these potential adverse effects; • describe the predicted residual adverse effects of the project and their significance (insert footnote 3) 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; and • describe the methodology used to identify, evaluate, and rate the adverse environmental effects and determine their significance (insert footnote 4), along with an explanation of the scientific rationale for choosing this

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					<p>methodology.</p> <p>The environmental evaluation should be conducted or overseen by an individual or individuals that possess adequate qualifications in the practice of environmental assessments in Alberta or Canada.</p> <p>Footnotes:</p> <ol style="list-style-type: none"> 1. Definition of “local study area” from Page 8 of the Government of Alberta’s <i>Glossary of Environmental Assessment Terms and Acronyms Used in Alberta Updated February 2010</i> 2. Definition of “life of the project” from page 8 of the Government of Alberta’s <i>Glossary of Environmental Assessment Terms and Acronyms Used in Alberta Updated February 2010</i> 3. Definition of “significance” from page 12 of the Government of Alberta’s <i>Glossary of Environmental Assessment Terms</i>

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					<p><i>and Acronyms Used in Alberta Updated February 2010</i></p> <p>4. Determining significance having consideration for, and quantifying where possible, factors such as the magnitude, extent, frequency, duration, and reversibility of the residual adverse effect</p>
		<p>7) Have you identified the agencies (e.g. Alberta Environment and Parks (AEP) Wildlife Management Unit, AEP Lands Approvals) that you consulted with as part of your project's design and route selection phase, described any prescribed guidelines and stated in the application how the guidelines will be followed?</p>		<p>AltaLink: 7) refers to AEP Land Approvals. AltaLink is not aware of this agency and assumes it should be AEP Public Lands.</p>	<p>The AUC understands that "Public Lands" is now part of the "Regional Approval Program Area" designation. In order to avoid frequent name changes and informal group names the AUC suggest deleting the examples in brackets and using "Have you identified the government agencies or departments that you have consulted with....,"</p>
		<p>11) Did you apply to Alberta Culture and Tourism for Historical Resources Act clearance for the project?</p> <p>(a) If a historical</p>		<p>AltaLink: Under 11), it is AltaLink's understanding that Alberta Culture no longer provides clearance for project and instead provides "approval". This comment is also applicable for 4) under</p>	<p>Agree...approval will be used rather than clearance.</p>

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		<p>resources impact assessment was required by Alberta Culture and Tourism, have you submitted a brief description of the paleontological, historical or archaeological sites that are near or traversed by the proposed routes?</p>		<p>the "Development of New Substations" portion.</p>	
		<p>18) If wildlife may be affected by the project, have you completed or planned pre-construction wildlife desktop and field surveys by suitably qualified personnel in accordance with AEP standards, guidelines and protocols (or some other commonly recognized survey protocol if AEP protocols are non-existent for a wildlife species) with a view to ensure that general routing decisions are informed by avoiding high risk areas and sensitive species; and specific facility placement decisions are informed by more detailed field assessments, and</p>		<p>AltaLink: Altalink has a number of issues with 18). This provision asks whether the proponent has conducted desk top and field survey "with a view to ensure that general routing decisions are informed by avoiding high risk areas and sensitive species". As mentioned above, when siting a transmission facility, a proponent is required by AUC Rule 007 to take into account and balance a number of factors including non-environmental factors such as impacts on residences and land use impacts. The wording of 18) appears to suggest that proponent must put environmental factors ahead of other the other factors listed in AUC Rule 007 and avoid certain environmental features. An</p>	<p>Agree that routing must balance multiple factors, however, it is expected that the presence of high risk areas and sensitive species will be identified and assessed prior to that balancing process. Suggest rewording "...routing decisions are informed respecting the presence of high risk areas and sensitive species."</p> <p>AUC does not consider that the language respecting sensitive species is inconsistent with the Wildlife Act and Regulations.</p>

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		<p>summarized the results of these surveys?</p> <p>(a) If targeted field surveys have not been conducted for sensitive species, have you provided a rationale for not completing them and confirmed that the rationale for this decision was discussed with an AEP wildlife biologist?</p>		<p>additional concern, is that a proponent is required to plan its transmission lines in accordance with the AESO's NID and Functional Specification which often set out a general location (or at very least defined end points such as existing substations) for the Project. Accordingly, it is not always feasible for a proponent to avoid certain environmental features. Lastly, Altalink is concerned with the definition of "Sensitive Species". This definition is overly broad as it includes "May be at Risk" and "Sensitive" with generic habitats that may make avoidance impossible. Furthermore, the Wildlife Act and Regulations have explicit language regarding house, nest or dens of prescribed wildlife and endangered animals. Altalink submits that this portion of the Draft Environmental Checklist should be redrafted with language more consistent with the Act and Regulations.</p>	<p>The AUC expects that the AESO will identify and consider any environmentally limiting factors in its general routing specifications and that the TFO may be able to provide advice to the AESO in that respect.</p> <p>The definition of Sensitive Species comes from a the published AEP document. The wording of Question No. 18 and the use of the term "Sensitive Species" was the result of AUC staff working with AEP Wildlife Management staff to settle on the most appropriate term. Different AEP documents that provide standards and guidelines for protecting wildlife and wildlife habitat, including the <i>EAP Integrated Standards and Guidelines</i> and the <i>Sensitive Species Inventory Guidelines</i>, employ the term "Sensitive Species" when referring to what wildlife species and habitat needs to be surveyed and protected. Another major wildlife policy document, the <i>Recommended Land Use Guidelines for Protection of Selected Wildlife Species and Habitat within Grassland and Parkland Natural</i></p>

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					<i>Regions of Alberta</i> , state that its guidelines apply to species with the classification of “may be at risk” and “sensitive and requiring special attention”, and not just endangered and threatened species.
		19) Have you described what monitoring you will conduct during operation of the transmission line to assess the effectiveness of the bird mitigation measures and discussed any steps you will take if monitoring indicates , in the opinion of the local avian or wildlife biologist of AEP, that unacceptable rates of bird mortality are occurring during operation?		AltaLink: 19) asks whether the proponent has "discussed any steps you will take if monitoring indicates, in the opinion of the local avian or wildlife biologist of AEP...". [emphasis added]. Altalink submits that relying on the opinion of a local avian or wildlife biologist is inappropriate as it does not set a consistent standard. Altalink suggests removing this section. Altalink is also concerned about the use of the term "unacceptable rate" as it is unclear what the definition of that rate is and who determines an "unacceptable rate".	Agree that wording could be enhanced. We agree to clarify that the opinion of the local avian or wildlife biologist of AEP, “consistent with AEP procedures and philosophies” be added, with respect to monitoring as well as unacceptable rates of bird mortality.
Development of New Substations		2) If the substation is being developed on crown lands, have you consulted with the land-use operations group of AEP on the project, described any prescribed AEP guidelines and stated		AltaLink: 2) asks whether a proponent has "consulted with the land use operations group of AEP on the project, described in any prescribed AEP guidelines and how those guidelines will be followed". As stated previously, AEP "guidelines"	Rather than replacing “followed” with “considered” reword as “followed or, if they cannot be explicitly followed, describe the reasons, and whether any deviations to the guidelines have been discussed with AEP.”.

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		<p>how the guidelines will be followed?</p>		<p>are not requirements. In some instances due to the geographic constraints of the AESO's NID or, the other factors that Altalink must take into account when planning its facilities in accordance with AUC Rule 007, it is not feasible to follow AEP guidelines. In other instances, different AEP guidelines may conflict. For example, Alberta Environment's Environmental Protection Guidelines for Transmission Lines states that a proponent should attempt to parallel existing linear disturbances where feasible (note: Alberta's approved South Saskatchewan Regional Plan also discusses linear disturbance and implies that a proponent should attempt, to parallel existing linear disturbances where feasible), which may conflict with certain set back distances for wildlife set out in the April 28, 2011, Recommended Land Use Guidelines for Protection of Selected Wildlife Species and Habitat with Grassland and Parkland Natural Regions of Alberta. In these cases, Altalink works with AEP to establish appropriate mitigations. Accordingly, Altalink suggests that the term</p>	

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				"followed" in 2) be replaced with "considered".	
Substation Modifications		The following sections apply to the non-emergency salvage, modification or repair of existing substations where soil excavation, on or immediately adjacent to a substation site, is proposed.		<p>ATCO Electric:</p> <p>Substation Modifications – "soil excavation": ATCO Electric requests clarification as to what the Commission deems to be considered "excavation" as it relates to work at existing sites.</p> <p>As previously requested, information requirements for applications pertaining to modifications to existing substations need to be limited to the area of the substation site upon which the approval is being sought. ATCO Electric follows all applicable rules and regulations in regards to release reporting, clean-up and remediation at its facilities and works directly with Alberta Environment and Parks in these instances.</p>	Excavation at existing sites is in the context of disturbing the ground at a depth below any gravel on the site, with the concern being exposure or migration of any contaminants that may be present on site.
	Operational History to Determine the Detail and Type of Information Needed	7) Was any electrical equipment containing insulating oil installed with underlying secondary containment such as a liner or sump on the existing substation site? If "yes" – ensure you complete line 12 Adequacy Of Secondary		<p>ATCO Electric:</p> <ul style="list-style-type: none"> (Questions 7-9) ATCO Electric requests clarification from the Commission as to where legal requirements exist to install secondary containment under electrical equipment and the basis for requiring 	<p>Questions do not prescribe that secondary containment under electrical equipment is required; instead the questions provide a more streamlined process if secondary containment has been installed.</p> <p>These procedures were discussed previously in</p>

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		<p>Containment.</p> <p>8) Have you described the duration of any PCB use on site and indicated both the maximum and the current PCB content of all fluid-filled electrical equipment that is not hermetically sealed?</p> <p>9) Was a secondary containment system installed after the substation commenced operations? If “yes” – ensure you complete line 11 Substations Operated for a Time Without Secondary Containment.</p>		<p>different types of information depending upon whether secondary containment has been installed or not. Previous discussion was not undertaken with proponents on this substantive change; ATCO Electric recommends this occurs prior to adoption to increase understanding of the background of these new requirements and the Commission's desired outcomes.</p> <ul style="list-style-type: none"> (Question 8) ATCO Electric requests clarification from the Commission as to how this requirement aligns with the federal PCB Regulation SOR2008/278. Upon receiving this clarification ATCO Electric again recommends that further discussion with proponents is held prior to adoption to ensure alignment in interpretation. 	<p>flowcharts that appeared to be accepted by the TFOs.</p> <p>The referenced document sets deadlines for ending the use of PCBs in concentrations above 50 mg/kg and for establishing practices to manage lower concentrations. While there is not a direct linkage between the proposed AUC procedures and the PCB Regulations, there is no inconsistency. The questions do not prescribe that secondary containment under electrical equipment is required; instead the questions provide a more streamlined process if secondary containment has been installed.</p>
	Environmental Assessment	10) For substations currently operating without		AltaLink:	The guidelines would apply to any contaminants that are on

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		<p>underlying secondary containment have you:</p> <p>a. Completed the steps in Figure 1 Process Flowchart for New Substations and Existing Substation Modifications and provided the date that the environmental assessment was completed?</p> <p>b. Described the methodology and summarized the conclusions of the environmental assessment conducted to assess the likelihood of encountering contamination and any need for further assessment?</p> <p>c. If needed, have you complied with Alberta release reporting requirements?</p> <p>d. If needed, have you described any additional contaminant assessment or remediation proposed during the</p>		<ul style="list-style-type: none"> The Draft Environmental Guidelines seem to imply the analysis in 10),11) and 12) should only be completed on those pieces of equipment with insulating oil ((7) of the checklist refers to "insulating oil", however, this is not entirely clear in 10),11) and 12) and should be further clarified. Altalink believes that it is worth clarifying that a discussion of existing secondary containment is not a requirement. More specifically, it is Altalink's understanding from the flowchart and past discussions with the working group that a proponent has the option of completing 11) and 12) of the Draft Environmental Guidelines to potentially avoid conducting an environmental assessment under 10). However, if the history of secondary containment is unknown, a proponent could complete the environmental assessment under 10) and not answer 11) and 12). Altalink suggests that the Commission change 	<p>the site, but would expectedly be most often associated with insulating oil.</p> <p>Proposed wording "for substations currently operating without underlying secondary containment or in cases where the history of the secondary containment is unknown..." is acceptable.</p>

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		<p>proposed work?</p> <p>e. Described any soil sampling or further environmental assessment to be undertaken during the proposed work?</p> <p>f. Briefly described plans to safely manage, transport and dispose of any used insulating oil during the proposed work?</p> <p>g. Briefly described plans to assess and, if needed, transport and dispose of soil affected by releases of regulated fluids?</p> <p>h. Described any public health and safety measures to protect the public from environmental hazards during the proposed work?</p>		<p>the wording in 10) to state:</p> <p>"for substations currently operating without underlying secondary containment or in cases where the history of the secondary containment is unknown...".</p> <ul style="list-style-type: none"> Altalink notes that in 10h) and 12d) and f), the Draft Environmental Guidelines asks the applicant to "describe any public health and safety measures to protect the public from environmental hazards during the work". As stated in previous correspondence, Altalink takes public health and safety seriously and submits that public health and safety must be considered in all aspects of project planning and not just in relation to the handling of potential contamination and contaminated materials. As a result, Altalink submits that the Draft Environmental Guidelines are not an appropriate place for health and safety 	<p>AUC does not object to subsequent discussion on health and safety perspectives, but considers the current reference to health and safety to be reasonable in this process.</p>

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				<p>guidelines. Instead, Altalink suggests that if the Commission wishes to consider an applicant's health and safety planning for a project, it should be done in relation to all hazards in a project and the Commission should seek input on such a requirement in a further working group.</p>	
				<p>EDTI: To provide further clarity for the Substation Developments Checklist, EDTI suggests the following changes to items 10 c. and d. on page 9:</p> <p>c. If needed, have you complied with Alberta release reporting requirements (if needed)?</p> <p>d. If needed, have you described any additional contaminant assessment or remediation proposed during the proposed work (if needed)?</p>	Restructured sentence is acceptable.
	Substations Operated for a Time Without Secondary Containment	11) For substations where secondary containment was installed after the electrical equipment commenced operations, have you:		<p>AltaLink:</p> <ul style="list-style-type: none"> The Draft Environmental Guidelines seem to imply the analysis in 10),11) and 12) should only be 	The guidelines would apply to any contaminants that are on the site, but would expectedly be most often associated with insulating oil.

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		<p>a. Indicated the date secondary containment was installed?</p> <p>b. Briefly described the nature of the secondary containment and its installation?</p> <p>c. Described any soils assessment conducted prior to installation of the liner?</p> <p>i. If “yes”, have you summarized the conclusions and recommendations of the soils assessment report and described any contaminant risk management or further environmental assessment proposed during the substation modification work?</p> <p>ii. If ‘no’, have you described how the potential for contaminants under the</p>		<p>completed on those pieces of equipment with insulating oil ((7) of the checklist refers to “insulating oil”, however, this is not entirely clear in 10),11) and 12) and should be further clarified.</p> <ul style="list-style-type: none"> Altalink also notes that the terms liner and secondary containment are used interchangeably in the Flowchart and the Draft Environmental Guidelines. It is unclear what the Commission means by the term "liner". Accordingly, Altalink submits that reference to "liner" should be changed to "secondary containment". 	<p>Change is acceptable.</p>

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		<p>secondary containment was assessed and how any associated contaminant risks are being managed?</p>			
	<p>Adequacy of Secondary Containment</p>	<p>12) For substations where secondary containment is now in place have you:</p> <ul style="list-style-type: none"> a. Listed the electrical equipment under which secondary containment was installed? b. Indicated if the integrity of the liner(s) has been tested in accordance with applicable standards and/or electrical industry best management practices and briefly described the test results? c. Indicated the date of any environmental field inspection conducted and summarized the conclusions and recommendations? 		<p>AltaLink</p> <ul style="list-style-type: none"> • The Draft Environmental Guidelines seem to imply the analysis in 10),11) and 12) should only be completed on those pieces of equipment with insulating oil ((7) of the checklist refers to “insulating oil”, however, this is not entirely clear in 10),11) and 12) and should be further clarified. • Altalink also notes that the terms liner and secondary containment are used interchangeably in the Flowchart and the Draft Environmental Guidelines. It is unclear what the Commission means by the term "liner". Accordingly, Altalink submits that reference to "liner" should be changed to "secondary containment". • Altalink further notes that 	<p>The guidelines would apply to any contaminants that are on the site, but would expectedly be most often associated with insulating oil.</p> <p>Agreed.</p> <p>Documents such as the “Environmental Code of</p>

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		<p>d. Briefly described plans to safely manage, transport and dispose of any used insulating oil during the proposed work?</p> <p>e. If planning to excavate within the secondary containment, have you briefly described plans to assess and, if needed, transport and dispose of backfill material affected by releases of regulated fluids?</p> <p>f. Described any public health and safety measures to protect the public from environmental hazards during the proposed work?</p>		<p>12b) asks whether the "integrity of the liner(s) has been tested in accordance with applicable standards and/or electrical industry best management practices...". Altalink is unaware of any applicable standards or electrical industry best management practices for testing a secondary liner.</p> <ul style="list-style-type: none"> Finally, in 12d), under the title "Adequacy of Secondary Containment", it requires the proponent to "briefly described (sic) plans to safely manage, transport, and dispose of any used insulating oil...". It is not clear to Altalink how this requirement relates to the adequacy of the secondary containment. Altalink submits this section should be removed. Altalink notes that in 10h) and 12d) and f), the Draft Environmental Guidelines asks the applicant to "describe any public health and safety measures to protect the public from environmental hazards during the work". As stated in previous 	<p>Practice for Aboveground and Underground Storage Tank Systems Containing Petroleum and Allied Petroleum Products" by Environment Canada contain references to monitoring practices in Part 6.</p> <p>The requirement is to ensure that there is a plan for contaminants to be safely and responsibly disposed of.</p> <p>AUC does not object to subsequent discussion on health and safety perspectives, but considers the current reference to health and safety to be reasonable in this process.</p>

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				<p>correspondence, Altalink takes public health and safety seriously and submits that public health and safety must be considered in all aspects of project planning and not just in relation to the handling of potential contamination and contaminated materials. As a result, Altalink submits that the Draft Environmental Guidelines are not an appropriate place for health and safety guidelines. Instead, Altalink suggests that if the Commission wishes to consider an applicant's health and safety planning for a project, it should be done in relation to all hazards in a project and the Commission should seek input on such a requirement in a further working group.</p>	
				<p>ATCO Electric: (Question 12b) ATCO Electric requests definition of which "applicable standards" are being referred to for testing the integrity of liners and whether they apply to both underground and above ground secondary</p>	<p>As an example, documents such as the "Environmental Code of Practice for Aboveground and Underground Storage Tank Systems Containing Petroleum and Allied Petroleum Products" by Environment Canada contain references to monitoring</p>

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General comments:				containment.	practices in Part 6.
					<p>Alberta Environment & Parks (Brian Lambert):</p> <p>The questions should be organized into headings or sections. They seem to jump around too much and don't really follow a logical order. This makes it harder to follow and creates potential for oversight and errors.</p> <p>They could be grouped on how common/universal they are to applications, from general to specific. Or, they could be grouped based on what they pertain to. That is, don't have an avian question, then a soils, then an aquatic, then another avian question. Group questions similarly based on environmental medium.</p> <p>It may be worth wording the questions as "Describe how..." or "Explain how..." as it may illicit better explanations. Rather than asking "Have you, or Did you..." because subconsciously the reader says YES/NO to themselves and moves on. Or instead of asking "Did you identify X...", just say "Identify X...". Acknowledged that the material could be organized in different fashions. The document is generally intended to assist the applicant in ensuring that the application document contains the appropriate material, rather than the checklists being standalone reference documents.</p> <p>AltaLink:</p> <p>As a general comment, there appears to be an inconsistent use of phrases in the Draft AUC Rule 007 and Draft Environmental Checklist. For example, environmental impacts and environmental effects appear to be used interchangeably in both documents. This inconsistent use of language causes confusion to the reader and AltaLink submits it should be changed. Consistent use of the terms impacts and effects will be incorporated.</p> <p><u>Substation Modifications:</u></p> <p><i>Inconsistencies between Draft Environmental Guidelines and Flowchart</i></p> <p>AltaLink has concerns regarding this portion of the Draft Environmental Guideline as it is not clear that it aligns with the Flowchart or with previous discussions that occurred amongst the working group. As discussed in AltaLink's previous correspondence on this matter, it was understood by AltaLink that there was general agreement that the scope of an environmental evaluation of an existing substation would be limited to the areas impacted by the scope of the project within the project footprint. For areas of potential contamination identified in the project footprint during the environmental evaluation, the following approach would be applied:</p> <ul style="list-style-type: none"> • a "major release" (i.e., reportable release) would result in notification to AEP and implementation of a mitigation plan that includes the excavation and recovery of soil to the safest and practical extent possible. • a "minor release" (i.e., non-reportable release) would result in the excavation and recovery of soil to the safest and practical extent

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					<p>possible where there are confirmed exceedances for the appropriate land use under the Alberta Tier 1 Soil and Groundwater Remediation Guidelines for planned ground disturbance areas.</p> <p>For areas of potential contamination identified outside of the project footprint during the environmental evaluation, the following approach is applied:</p> <ul style="list-style-type: none"> • a "major release" (i.e., reportable release) would result in notification to AEP and implementation of a mitigation plan that includes the excavation and recovery of soil to the safest and practical extent possible. • a "minor release" (i.e., non-reportable release) would be documented, retained in Altalink's records, and addressed in future modification work and/or ongoing operation and maintenance activities. <p>The aforementioned process is highlighted in the Flowchart but does not appear to be clear in the Draft Environmental Guidelines.</p> <p>This approach is generally reasonable, and should include information with respect to how the release volume has been determined.</p>
					<p>ATCO Electric:</p> <p>The purpose of the Guidelines I Checklist remains unclear. Within the revised text of Rule 007, Section 7.1.1, it states that "Commission guidance with respect to environmental aspects of the applications is provided in the following documents ..." Within the Checklist it states that the intent is to assist applicants in assembling environmental information but then also states that applicants need to answer each question with yes, no or not applicable. The Guidelines should be used to provide additional information to support applicants in answering TS35 to TS43 and there should be no requirement to provide yes or no answers to each question. This comment applies to the Guidelines/ Checklist for Substation Developments as well.</p> <p>The purpose is to assist applicants in assembling environmental information for their applications. Completing the form and providing explanations may be of assistance and provide efficiency for both the applicant and the AUC. The checklist and supporting explanations do not need to be provided, however, they may be of assistance and result in process efficiencies. Ultimately, if the application material is incomplete or explanations are not provided, an inefficient process with delays to the applicant are likely to result.</p> <p>ATCO Electric: "Assessment Area": ATCO Electric is requesting additional clarification as to the definition of the "Assessment Area" referred to in questions 1, 2 and footnote no.1. Please identify under which AEP guidelines the definition of the term "Assessment Area" was established. This comment also applies generally to the Guidelines/Checklist for Substation Developments and corresponding modification flowcharts. There are multiple instances throughout the documents which reference "AEP guidelines" without defining which guidelines are being referred to. This clarity is required in order to understand AUC expectations; all AEP guidelines referenced should include the formal title.</p> <p>Discussed above.</p>
					<p>EDTI:</p>

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					<p>To provide clarity regarding the AUC's intention for the Checklists, EDTI suggests that the following sentence be added to each of the Checklists:</p> <p style="padding-left: 40px;">It is not necessary to include a copy of this Checklist with an application however; the applicant should address each question, as applicable, within an application.</p> <p>Agreed.</p> <p>In addition, the AUC agrees with the suggested edits to page 4 of the flowchart with the following notation.</p> <p>There are several factors regarding EDTI's proposed distinction that warrant additional consideration.</p> <ol style="list-style-type: none"> 1) hermetically sealed electrical equipment may be installed to replace non-sealed fluid filled equipment. When hermetically sealed equipment was first introduced, it was often used to replace existing equipment that had been problematic. Therefore the presence of hermetically sealed equipment does not necessarily mean that releases from the previous equipment have been addressed. It is recommended that EDTI's proposal be modified slightly to distinguish between substations where hermetically sealed equipment has been used exclusively since the facility was constructed from those where non-sealed, fluid filled equipment has been used. 2) substations with auxiliary cooling may use glycol-based cooling fluids, that if released, may cause an adverse effect. Auxiliary cooling of substations is relatively rare but becoming more prevalent. It is recommended that EDTI's proposal be modified slightly to distinguish sites containing electrical equipment that is hermetically sealed from sites which has used non-hermetically sealed electrical equipment or fluid based auxiliary cooling equipment.
					<p>ENMAX:</p> <p>ENMAX provided revised flowchart proposals that eliminated the sections related to liner installations.</p> <p>The AUC prefers to retain the prior format and content of the flowcharts including the changes proposed by EPCOR.</p>