

Rule 007: Applications for Power Plants, Substations, Transmission Lines, Industrial System Designations and Hydro Developments

Stakeholders' comments on proposed changes

[Stakeholders: ATCO Electric, AltaLink Management Ltd., Environment Canada, ENMAX Energy Corporation, Maskwa Environmental Consulting Ltd., EPCOR Distribution & Transmission Inc., TransAlta Corporation, TransCanada Corporation]

Stakeholder	Section	Stakeholders' comments	AUC response
ATCO Electric	Section 1.4.3 – Power plants	<ul style="list-style-type: none"> <li data-bbox="720 613 1408 643">• Clarification regarding required adherence to IGUCCR <p data-bbox="768 675 1542 730">ATCO Electric fully supports the revisions noted in paragraph 4 of Section 1.4.3 which state:</p> <p data-bbox="817 766 1602 883" style="padding-left: 40px;">“If the power plant is an isolated generating unit with a capability of less than 10 megawatts the owner may proceed without filing an application if the requirements of Section 18.3(2) of the <i>Hydro and Electric Energy Regulation</i> are met.”</p> <p data-bbox="768 919 1639 1250">However, in Part 4, Section 27 of the <i>Isolated Generating Units and Customer Choice Regulation</i> (IGUCCR) as it is currently written, owners proposing to replace or add an isolated generating unit must apply to the Commission for approval of the replacement or additional generating unit, and the Commission must approve the proposed alterations. Please advise whether the Commission believes that the provisions of the current draft of Rule 007 (Section 1.4.3, paragraph 4) and Section 18.3(2) of the <i>Hydro and Electric Energy Regulation</i> with regards to minor alterations at isolated generation facilities remove the onus on owners to apply to the Commission for additions and replacements as outlined in Section 27 of the IGUCCR.</p> <ul style="list-style-type: none"> <li data-bbox="720 1286 1569 1341">• Clarification on protocol for updating Permit and Licence for Isolated Generating Unit facilities 	<p data-bbox="1682 613 2494 821">No, the AUC does not consider that the provisions of the current draft of Rule 007 (Section 1.4.3, paragraph 4) and Section 18.3(2) of the <i>Hydro and Electric Energy Regulation</i> with regard to minor alterations at isolated generation facilities remove the onus on owners to apply to the Commission for additions and replacements as outlined in Section 27 of the <i>Isolated Generating Units and Customer Choice Regulation</i>.</p>

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		<p>Also with respect to the proposed paragraph 4 of Section 1.4.3, it is unclear to ATCO Electric how, in the absence of a filing to the Commission, the operating Permits and Licences for Isolated Generating Unit facilities will be updated to show the most current listing of generating units in keeping with the Commission's current practice of listing this equipment.</p> <p>If the Commission confirms that Section 1.4.3 of the draft of Rule 007 and Section 18.3(2) of the <i>Hydro and Electric Energy Regulation</i> removes the onus on owners to apply to the Commission (as discussed above), does the Commission propose to rescind the approvals for existing facilities that meet the criteria outlined in Section 18.3(2) of the <i>Hydro and Electric Energy Regulation</i>?</p> <p>If not, to ensure that Permits and Licences remain reasonably current, ATCO Electric proposes to include updated Draft Permits and Licences for facilities with equipment changes as an attachment to their Annual Update submission required under the IGUCCR.</p> <p>In that case, ATCO Electric suggests that the paragraph below be included immediately following paragraph 4 in Section 1.4.3 (listed above):</p> <p style="padding-left: 40px;">“Owners of Isolated Generating Units must, as part of their Annual Update to the <i>Isolated Generating Units and Customer Choice Regulation</i> filing, include draft revised approval documents for all facilities that through minor works completed under the provisions of section 18.3(2) of the <i>Hydro and Electric Energy Regulation</i> would result in a material change to the approval. The Commission upon receipt will proceed to rescind the existing approval and issue new approvals to the owner.”</p>	<p>The AUC does not consider that the provisions of the current draft of Rule 007 (Section 1.4.3, paragraph 4) and Section 18.3(2) of the <i>Hydro and Electric Energy Regulation</i> with regard to minor alterations at isolated generation facilities remove the onus on owners to apply to the Commission for additions and replacements as outlined in Section 27 of the <i>Isolated Generating Units and Customer Choice Regulation</i>.</p> <p>The AUC acknowledges that owners of isolated generating units must obtain written confirmation from the Commission regarding the list of units and related information in order to update the Schedule in the regulation. The AUC will work with ATCO Electric to confirm the procedure for updating the Schedule, but does not contemplate issuing an approval to the owner unless one is required under Section 11 of the <i>Hydro and Electric Energy Act</i>.</p>
	Section 3 – Power plant applications one megawatt or greater	<ul style="list-style-type: none"> • Clarification on “Capacity” vs. “Capability” <p>In the October 19, 2015 draft of Rule 007, the term “capacity” has been replaced throughout all sections relating to power plants with the term “capability”. It is unclear to ATCO Electric why this terminology has changed, and what the Commission's preferred definition of “capability” is.</p>	<p>The term capability is consistent with that used in the <i>Hydro and Electric Energy Regulation</i>, the <i>Electric Utilities Act</i>, and the Alberta Electric System Operator in its rules. The AUC notes that capacity and capability are often used interchangeably, but has decided to use capability in Rule 007.</p>

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		<p>ATCO Electric suggests that a definition of “capability” be included in Rule 007 as a footnote or the language in the Rule be revised back to the accepted term of “capacity”.</p>	
	<p>Section 7.1.1 Environmental and land use information</p>	<ul style="list-style-type: none"> <li data-bbox="717 386 1658 716"> <p>• TS38 (formerly TS39) - <i>Historical Resources Act</i> approvals ATCO Electric has concerns regarding the revised wording in TS38 (formerly TS39):</p> <p style="padding-left: 40px;">“Confirm that a <i>Historical Resources Act</i> approval has been obtained. If a historical resource impact assessment is required, briefly describe any historical, archaeological or paleontological sites along the routes, with emphasis on major features close to or traversed by the route. Please ensure that any historical, archaeological or paleontological resources described exclude confidential site location, type and content information.”</p> <p>Based on the October 19, 2015 blackline version of Rule 007 provided to stakeholders, it appears that the wording “or is being applied for” has been removed with respect to <i>Historical Resources Act</i> approvals. ATCO Electric’s interpretation of this proposed change is that an approval must now be granted prior to the submission of a facilities application, rather than the current requirement that allows for <i>Historic Resources Act</i> clearance to be applied for concurrently with a facilities application. Under the <i>Historic Resources Act</i>, proponents are unable to construct before clearance under the Act has been granted by Alberta Culture and Tourism. As the regulator for historic resources, Alberta Culture and Tourism ensures through its processes that new development or expansion of sites does not impact historical resources in Alberta. While ATCO Electric agrees that proponents should comment on the status of <i>Historic Resources Act</i> applications in their facilities applications and that doing so provides the Commission with confidence that due diligence measures are in place, ATCO Electric believes that requiring proponents to have full clearance prior to submitting a facilities application will substantially delay filings. In ATCO Electric’s opinion, requiring confirmation that a proponent has obtained clearance is a redundant measure to a process that is otherwise managed and monitored by Alberta Culture and Tourism.</p> 	<p>The AUC agrees to revise TS38 to include flexibility for <i>Historical Resources Act</i> approval, to confirm that approval has been obtained or “has been applied for”.</p>

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		<ul style="list-style-type: none"> TS41 - Clarification on application and definition of "area" TS41 states: "If the project is to be constructed within an area where, upon appropriate assessment, the proponent is aware of or ought to be aware that a substance that may cause, is causing or has caused an adverse effect to the environment has been released, indicate the nature of the reportable release, how the release was administered and reported, and how any resultant or ongoing effects will be administered or contained with regard to the proposed project." ATCO Electric interprets this TS41 requirement as being applicable only to substation projects, as the expectation for proponents to be "aware" of all potentially harmful substances within the area or in the immediate right-of-way of a proposed transmission line alignment, is not aligned with the <i>Environmental Protection and Enhancement Act</i>, is 4 unreasonable and cannot be prudently achieved. Please confirm that TS41 is intended to apply only to substation sites. Assuming that TS41 is intended to apply only to substation sites, ATCO Electric suggests that the term "area" be further narrowed or defined to be limited to the "area of the substation site upon which approval is being sought" or "the immediate footprint of the proposed alterations." 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>The AUC agrees and will revise TS41 as "If the project is to be constructed within an area of a substation for which approval is being sought...."</p>
	<p>Comments on environmental guidelines checklist for applicants</p>	<ul style="list-style-type: none"> As noted in ATCO Electric's comments above regarding the need for further definition of the word "area" as applied in TS41 of the draft Rule 007, ATCO Electric requests that the assessments outlined in the Environmental Evaluation section of the Substation Development – Environmental Guidelines Checklist for Applicants be limited to the "area of the substation site upon which approval is being sought" or "the immediate footprint of the proposed alterations." 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. ATCO Electric also complies with annual inventory reporting and required release reporting to Environment Canada 	<p>The AUC agrees that the language in the rule and checklist should be consistent, and considers that the language in the checklist achieves the criteria.</p>

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		<p>under the federal PCB Regulations. It is ATCO Electric's perspective that the information requested by the Commission in TS41 and the corresponding Substation Development – Environmental Guidelines Checklist for Applicants is a redundant measure for environmental aspects of transmission development that are currently managed and monitored by other provincial and federal regulatory agencies.</p> <ul style="list-style-type: none"> ATCO Electric would also like to reiterate comments provided on the previous draft of Rule 007 through correspondence to the Commission provided on July 24, 2015 regarding secondary containment. ATCO Electric requests clarification as to where legal requirements exist to install secondary containment under electrical equipment. Based on ATCO Electric's understanding of current legislation, it is unclear as to the basis for or intent of the Commission's request for requiring different levels of information depending on whether secondary containment has been installed or not. 	<p>The intention of the comments on secondary containment was to facilitate a more streamlined process where secondary containment has been installed, rather than to identify a requirement for the installation of secondary containment.</p>
	General Comment	<ul style="list-style-type: none"> Generally, it is also ATCO Electric's perspective that there were significant wording revisions from the previous version of Rule 007 issued for stakeholder consultation and the October 19, 2015 version, specifically in regards to Section 7.1.1 Environmental and land use information. These revisions were not discussed at the September 14, 2015 stakeholder meeting so ATCO Electric is unclear as to the Commission's intent in including them. The proposed revisions appear to be focused on aligning Rule 007 requirements more closely with Environmental Impact Assessment terminology and methodology, for which transmission facilities are currently exempt. ATCO Electric is concerned that this change has the potential to result in significant cost and schedule impacts for future transmission development. Further clarification is requested from the Commission on this point. 	<p>The AUC revisions were intended to utilize terminology that is consistent with that used in government and industry. There is no intention to require environmental impact assessments, in addition to those required under the <i>Environmental Enhancement and Protection Act</i>. For this reason, the term, "environmental evaluation" is used.</p>

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AltaLink	Section 6.1 – ISO needs identification document application information requirements	<ul style="list-style-type: none"> <li data-bbox="717 245 1658 488">• NID 7)(5)(a) AltaLink is unclear as to whether, in this portion of the rule, the Commission is suggesting that the conductor and conductor bundling arrangement should be determined at the Need Identification Document (NID) stage. Often the technical planning at NID stage is very preliminary and accordingly, it is only appropriate to be determining the capacity and voltage. Conductor and bundling should be determined at the Facility Application stage. <li data-bbox="717 521 1658 699">• NID 7)(5)(b) This appears to replace the current NID 10) and seems to be more broad in allowing the AESO to make the determination on "proposed transmission line configurations". AltaLink submits that this should be determined at Facility Application stage by the Transmission Facility Owner (TFO) or market participant. <li data-bbox="717 1073 1658 1284">• NID 7)(6) AltaLink submits that timing should be considered in only one portion of the rule. The current drafting appears to have some timing factors in NID 7(6) and some in NID 9(2). As construction planning involves multiple different factors that must be considered together, it would make sense to combine all construction timing sections of the rule. See also comments below for further concerns regarding NID 9(2) 	<p data-bbox="1680 245 2497 423">Realistically and practically, the ISO, in the course of each of its transmission planning processes, must determine appropriate assumptions in terms of transmission line physical parameters and relevant line termination features, other than transmission line routing related matters, in order for it to arrive at its targeted transmission system performance.</p> <p data-bbox="1680 488 2497 578">Those system performance indices generally include load-carrying capabilities, area transfer-in or transfer-out capabilities and various system reliability considerations.</p> <p data-bbox="1680 610 2497 789">The technical information required in NID7(5)(a) and NID7(5)(b) are simply those assumptions that the ISO has relied on to arrive at the system study results that are required to be included in the NID pursuant to Section 34(a) of the <i>Electric Utilities Act</i>, i.e. the means by which or the manner in which the system constraint or condition could be alleviated.</p> <p data-bbox="1680 821 2497 1000">After the NID is approved, the TFO or the market participant assigned to the development project has the responsibility to implement the development plan that would attain performance standards equal to or better than those specified by the ISO. The AESO is aware of the reasons for the requirements of NID7(5)(a) and NID7(5)(b) and does not take issue with this matter.</p> <p data-bbox="1680 1081 2497 1170">The timing reference in NID7)(6) references constraints that may be associated with various options whereas the reference in NID 9(2) is associated with the required service date.</p> <p data-bbox="1680 1187 2497 1243">This requirement results from Section 11(3)(g)(vi) of the <i>Transmission Regulation</i>.</p>

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		<ul style="list-style-type: none"> <li data-bbox="715 230 1658 1141"> <p>NID 7)(9) These sections appear to replace NID 13). NID 13) currently sets certain requirements that the ISO must consider when identifying and recommending a preferred corridor for transmission facilities including: 1) Agricultural Impact; 2) Residential Impact; 3) Environmental Impact; 4) Cost; 5) Electrical Considerations; 6) Visual Impacts; and 7) Special Constraints. These factors have been used as general guidance to AltaLink in routing transmission lines, and have been recognized by the Commission in multiple decisions as acceptable factors that should be considered when siting transmission facilities. For example, in the Heartland decision, the Commission stated when referring to the seven factors listed in the current NID 13) that: "The seven routing factors discussed by the board over thirty years ago in decisions 80-A and 81-0, continue to be relevant and applicable". In Decision 2012-327, the Commission outlined the factors it considers in determining impacts of transmission facilities and stated: "In determining social, economic and environmental impacts, the Commission considers routing criteria accepted in previous decisions: agricultural impacts, residential impacts, visual impacts, electrical considerations, environmental impacts and cost. The Commission also considers special constraints such as airports and schools and in this decision considers the effects of paralleling existing linear disturbances." AltaLink is concerned that the proposed changes to AUC Rule 007 (Rule 007) change these factors significantly and create an inconsistency between the factors the TFO considers when siting facilities, and the factors the AESO considers when analyzing impacts of developments. This appears to replace the current NID 10) and seems to be more broad in allowing the AESO to make the determination on "proposed transmission line configurations". Alta link submits that this should be determined at Facility Application stage by the Transmission Facility Owner (TFO) or market participant.</p> <p>More specifically, NID 7(9) removes residential and visual impacts and special constraints and puts extra emphasis on environmental factors. As the Commission is aware, it is obliged by Section 17 of the Alberta Utilities Commission Act to consider whether the proposed project is in the public interest having regard to its social and economic effects and its effect on the environment. The proposed drafting appears to suggest that environmental impacts should be given more weight when the AESO is evaluating impacts of options while social impacts such as residential</p> 	<p>The AUC intends that NID7)(9) is to identify any regions where facility installations may be prohibited and to evaluate the effects associated with alternatives. The examples provided are intended as illustrations of possible types of constraints. The AUC is not prohibiting the ISO from including a factor or constraint it considers to be relevant.</p> <p>The AUC agrees that the need assessment process is required to assess and balance varying technical, social, economic, land use and environmental considerations. The AUC is not prioritizing or otherwise emphasizing one impact/effect more than another.</p> <p>The requirements of NID 7)(9) result from Section 11(3)(g)(vii) of the <i>Transmission Regulation</i>.</p> <p>The AUC considers that the first and second paragraphs describe different situations. If a broad development area is defined by the ISO, then it may address "environmental and land use effects by way of a desktop evaluation to identify areas where the development of transmission facilities may be prohibited, and to evaluate the effects of the options considered." However if the applied for option is within a specific corridor with limited routing flexibility options or at a specific facility location (e.g. new substation location), identify any area within the corridor or facility location where the development of transmission facilities may be prohibited, to an appropriate level of detail, and evaluate the effects of the options considered.</p> <p>The information requirements in NID 7(9) may be satisfied by reference to a jointly filed facility application, or provided separately by the ISO. The Commission expects that in most cases the detailed routing or siting effects will be further assessed in the TFO's facility application. However, if the NID is a standalone application, and it includes a specific corridor or specific facility location, then more detailed information may be required in the needs identification document.</p>

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		<p>and visual impacts and other constraints need not be considered. This becomes problematic as it potentially pushes development towards residential areas without a detailed analysis of all impacts.</p> <p>If, under NID 7(9), the AESO is required to evaluate its development area or corridors on a different set of criteria from what the Commission has traditionally required the TFO to consider in its siting (see Heartland and WATL decision quoted above), there is an increased risk of the TFO providing routing outside of the development areas proposed by the AESO. Such an inconsistency may lead to procedural fairness issues in NID and transmission facility proceedings as stakeholders impacted by the transmission facilities may have been outside the corridor identified in the NID, and accordingly missed their chance to participate in the NID proceeding.</p> <p>The intent of the current drafting of NID 7(9) is also unclear. The first paragraph refers to looking at environmental and land use effects in a "development area defined by the ISO" whereas the second paragraph states that "if the applied for option is within a specific corridor or at a specific facility location (e.g. new substation location) ... evaluate the effects of the options_ considered" . It is unclear from this portion of Rule 007 what the AESO, or TFO on behalf of the AESO, is meant to be evaluating. Are they meant to evaluate the "development area" or is this evaluation only meant to occur in cases where "the applied for option is within a specific corridor or at a specific location (e.g. new substation location)"?</p> <p>AltaLink is also concerned about the prescriptive nature of NID 7(9) especially in relation to the environmental factors to be considered. Land use assessments at the NID stage occur very early in the project and prior to any consultation with agencies or other stakeholders. NID 7(9) is far more prescriptive with respect to what needs to be considered than the sections of Rule 007 that cover the detailed siting of the transmission facilities by the TFO. AltaLink submits that the level of detail in NID 7(9)(c) and (d) should be removed.</p> <p>AltaLink submits that this section of Rule 007 should be redrafted to require the AESO to evaluate the high level topics referred to currently in NID 13), namely, 1) Agricultural Impact; 2) Residential Impact; 3)</p>	<p>The AESO is aware of the reasons for the requirements of NID7)(9) and does not take issue with this matter.</p>

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		<p>Environmental Impact; 4) Cost; 5) Electrical Considerations; 6) Visual Impacts; and 7) Special Constraints, as these factors have already been recognized by the Commission in past decisions. The way NID 7)(9) is currently drafted puts too much emphasis on only one factor that proponents must consider when planning and siting projects, and that the Commission must consider when judging whether a project is in the public interest.</p> <ul style="list-style-type: none"> • NID 9)(2) This section requires the evaluation of the implementation schedule of the preferred option and appears to focus only on providing the TFO sufficient time for wildlife inventories and restricted activity periods for wildlife. As stated above, NID 7)6) also discusses project and construction timing and risks. AltaLink submits that there are many social, economic and other factors that must be considered as a whole when planning and scheduling projects. These include, but are not limited to, environmental constraints, constructability constraints (for example, frozen ground conditions which can also be an environmental constraint), cost constraints, electrical need of the project and outage constraints. These factors may change based on the project. AltaLink submits that while wildlife constraints are important they should be balanced with other constraints and should not take priority. Further, at the NID stage, routes are not yet determined and construction details are not finalized (and could be further impacted by factors not known at the time of NID submission including customer or AESO delays or delays in receiving Project Permits & Licenses). It is premature at this stage to propose detailed schedules that take into account restricted wildlife activity dates. Accordingly, Alta link suggests that NID 9)(2) be redrafted to state: "the implementation schedule for the preferred option including in-service date as well as potential limitations or constraints that may be faced in reaching that in-service date". • NID 15) (2), NID 23(3) and NID 30) See comments for NID 7)(9) above • NID 17)(2), NID 25 (2) and NID 32)(2) See comments for NID 9)(2) above 	<p>The AUC agrees and will revise NID9)(2) as “the implementation schedule for the preferred option including an in-service date as well as potential limitations or constraints, such as completion of wildlife or other studies, that may be encountered in achieving that in-service date, having regard for the above factors.”</p>

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	Section 7.1.1 Environmental and land use information	<ul style="list-style-type: none"> <li data-bbox="717 245 1658 548">• TS 35) TS 35) requires a TFO to provide the clean-up and reclamation plan that will be carried out following commissioning including that of any temporary work spaces and access roads. Although AltaLink does not have concerns with providing general practices it follows when reclaiming lands, it will be difficult to provide specifics of temporary work spaces and access roads at the Facility Application stage. Temporary work space and access roads are generally not finalized by AltaLink until detailed engineering is conducted and detailed construction plans are created which often does not occur until routes are approved by the AUC. <li data-bbox="717 581 1658 1068">• TS 36) TS 36) requires the TFO to indicate those areas that have been identified as significant viewpoints. TS 36) also requires the TFO to: "Identify those project components and locations that require screening and the screening measures (e.g., fences, earth berms, painting, landscaping) to be used." AltaLink assumes that the latter requirement relates only to areas that have been identified as significant viewpoints. AltaLink suggests rewording this section to state: "TS36) Visual aesthetics and screening- indicate those areas that have been identified as significant viewpoints, describe how the project is predicted to adversely affect those viewpoints, and describe the measures proposed to minimize the visual effects of towers and the right of way within the viewpoint areas including the identification of project components and locations that require screening and the screening measures (e.g., fences, earth berms, painting, landscaping) to be used. <li data-bbox="717 1101 1658 1403">• TS 38) In the new draft of TS 38), the commission requires the TFO to confirm that <i>Historical Resources Act</i> (HRA) approval has been obtained and has removed "or is being applied for" from the current language. AltaLink has concerns about this deletion. AltaLink understands that, in order to minimize the potential impacts on historical resources, Alberta Culture and Tourism generally prefers to have proponents only conduct Historical Resources Impact Assessments on the routes they plan to build. Accordingly, although AltaLink will file for HRA direction prior to filing a Facility Application, AltaLink will often postpone filing for HRA approval 	<p data-bbox="1680 245 2486 331">TFOs are encouraged to identify temporary workspace and access roads at an early stage, particularly when these areas are large and could influence the overall routing of a project.</p> <p data-bbox="1680 581 2486 857">The AUC agrees with the proposed wording as follows "Visual aesthetics and screening – indicate those areas that have been identified as significant viewpoints, describe how the project is predicted to adversely affect those viewpoints , and describe the measures proposed to minimize the visual effects of towers and the right-of-way within the viewpoint areas including the identification of project components and locations that require screening and the screening measures (e.g., fences, earth berms, painting, landscaping) to be used."</p> <p data-bbox="1680 1149 2486 1235">The AUC agrees to revise TS38) to include flexibility for <i>Historical Resources Act</i> approval, to confirm that approval has been obtained or "has been applied for".</p>

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		<p>until the Commission has approved a specific route, especially in cases where AltaLink has filed a preferred and alternate route. AltaLink submits that the Commission should leave "or is being applied for" in this portion of Rule 007. Alternatively, AltaLink has provided suggested wording below that reflects the actual process followed with Alberta Culture and Tourism: "Confirm that application for <i>Historical Resources Act</i> direction has been submitted to Alberta Culture and Tourism. If a Historical Resources Impact Assessment is required or has been completed, briefly describe any known historical resources along the routes, with emphasis on major features close to or traversed by the route. Please ensure that any historical resources described exclude confidential site location, type, and content information. Confirm that <i>Historical Resource Act</i> approval will be secured prior to construction or provide the approval if it has been issued by Alberta Culture and Tourism."</p> <ul style="list-style-type: none"> TS 39) AltaLink notes that significant changes have been made to this portion of Rule 007 since the last working group meeting. It appears that the Commission has attempted to make the language of TS39) similar to that of PP 17) dealing with power plant applications which appears to describe in general terms the environmental impact assessment process required under the Environmental Protection and Enhancement Act (EPEA). In its draft of TS 39), the Commission has incorporated terms such as "life of the project", "local study area" and "significance" as defined in the Glossary of Environmental Assessment Terms and Acronyms Used in Alberta (the Glossary). By using defined terms from the Glossary, the Commission also brings into Rule 007 other elements of the environmental assessment process such as "Valued Ecosystem Components" which is used in the definition of "significance". The environmental assessment process under EPEA is complex, consists of processes that are not covered by Rule 007 and involves significant steps by Alberta Environment and Parks (AEP). The environmental assessment process under EPEA is also considerably more time consuming and costly for proponents (and in turn customers and ratepayers). Transmission lines are explicitly exempted from environmental assessments under the Environmental Assessment (Mandatory and Exempted Activities) Regulation, yet it appears from the language in Rule 007, TS 39), that the Commission is attempting to implement an environmental assessment type process as outlined in EPEA for transmission lines. AltaLink submits 	<p>The AUC revisions were intended to utilize terminology that is consistent with that used in government and industry. There is no intention to require environmental impact assessments in addition to those required under the <i>Environmental Enhancement and Protection Act</i>. For this reason, the term, "environmental evaluation" is used.</p>

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		<p>that the use of environmental assessment language and definitions in Rule 007 confuses proponents and stakeholders as to what is required. AltaLink submits that language from the Glossary should be removed from Rule 007.</p> <p>In addition, AltaLink also has specific concerns with certain elements of the language used in TS 39) which it has outlined below:</p> <ul style="list-style-type: none"> ○ TS39 ii) states: "Describe how environmental effects will be avoided, mitigated or compensated for during the life of the project". The addition of the terms "compensated" and "life of the project" are a concern. AltaLink is not aware of a specific compensation regime for transmission infrastructure under the EPEA or through AEP. Accordingly, it is unclear as to when such compensation would be required and how it would be determined and calculated over the life of the project. As a regulated utility, AltaLink is required to account for amounts spent in building its projects in its deferral account proceedings and is therefore concerned about the inclusion of the broad term "compensation" in Rule 007 without some mechanism or legislation setting the requirements, limits and how such compensation would be determined. AltaLink submits that reference to "compensation" should be removed from this portion of TS 39). ○ TS39 ii) requires a proponent to describe "potential adverse effects (both direct and indirect)". AltaLink submits the use of the term "indirect effects" is ambiguous. AltaLink submits that Rule 007 should refer to "effects" and the reference to "(direct and indirect)" should be removed. ○ TS39 ii), in the last sentence, requires the proponent to "describe the methodology used to identify, evaluate and rate any adverse environmental effects and determine their significance, along with an explanation of the scientific rationale for choosing this methodology". The scientific assessment of significance appears to be extracted from the environmental assessment process in EPEA. As described above, transmission lines are exempt from the environmental assessment process and there are issues with incorporating EPEA language into Rule 007. AltaLink submits that this sentence should be removed in its entirety. 	<p>The AUC will delete the terminology "or compensated for during the life of the project". The AUC will delete similar language from PP17.</p> <p>The AUC will delete the terminology "(direct and indirect)".</p> <p>The AUC revisions were intended to utilize terminology that is consistent with that used in government and industry. There is no intention to require environmental impact assessments in addition to those required under the <i>Environmental Enhancement and Protection Act</i>. For this reason, the term, "environmental evaluation" is used.</p>

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		<ul style="list-style-type: none"> ○ TS39) ii) states that the proponent is required to "provide supporting written discussion with other government agencies .. ". AltaLink suggests that this be modified to "provide a summary of consultation and discussions that have occurred with other government agencies .. ". Often consultation with government agencies occurs in person or over the phone and therefore there is no "written discussion". In some instances, government agencies will review projects and not provide any comments on the project or will wait until the project is approved and they are dealing with a defined footprint. Additionally, Alta link submits that the example provided in the rule is not necessary and should be deleted. AltaLink notes that nowhere else in Rule 007 does it provide examples of consultation and submits that such content is more appropriate in the guidelines. ● TS 41) In TS 41), the Commission appears to be attempting to paraphrase several different requirements of the EPEA in relation to release reporting requirements. AltaLink submits that this portion of Rule 007 should be omitted in its entirety for several reasons. First, AltaLink is concerned that in attempting to paraphrase several different requirements of EPEA into one sentence, the context of the rest of the legislation including the definitions is lost. It also potentially creates requirements that conflict with the legislation as discussed further below. Further, in the draft 41), Alta link submits that the Commission has changed the intent and broadened the scope of the EPEA release reporting and administration requirements and in doing so has created unintended consequences. More specifically, the draft 41) requires a TFO to comment on the history, reporting and administration of a release that occurred on land where a project is to be located regardless of whether that TFO is the party in control or responsible for the release. The wording neglects to consider that often TFOs build projects, through easements and leases, on lands which are not their own or under their control. For example, Alta link often constructs new substations on existing industrial sites for customers who are under the jurisdiction of other regulators. AltaLink generally does not take ownership of these lands. These sites may have evidence of past spills by the industrial owners over which AltaLink has no control. AltaLink also generally does not own the land on 	<p>The AUC acknowledges the potential concern with respect to consultation and will revise the language to “Provide a summary of consultation and discussions that have occurred with other government agencies related to the adverse effects.....</p> <p>The AUC considers that the example may provide a useful reference.</p> <p>As discussed previously in this document, the AUC will revise TS41) as “If the project is to be constructed within an area of a substation for which approval is being sought.....”</p>

Stakeholder	Section	Stakeholders' comments	AUC response
		<p>which its transmission lines are located and instead obtains easements for its lines. Under the suggested drafting of TS 41), a TFO would be required to comment on a release, the reporting of that release, and how the release was and is being administered even if it did not cause the release, have any control of the release or the on-going administration of the release, and does not own the land on which the release occurred. This goes far beyond the release reporting and mitigation provisions in EPEA4 and arguably creates accountability for the TFO that does not exist in the legislation. Additionally, the work required to do the assessment suggested in TS 41) on lands not owned by the TFO would require significant extra cost, time and the cooperation of the third party land owner (who may be under the jurisdiction of another regulator and who may not cooperate).</p> <p>Finally, TS 41) is redundant. AltaLink understands that the Commission is concerned about the administration of past releases on existing substation sites. As mentioned above, the EPEA already contains requirements for reporting of releases. Additionally, the information requested in the draft TS 41) is already contained in the document "Substation Development-Environmental Guidelines Checklist for Applicants" for existing substations; AltaLink submits that this is an appropriate place for such information. Accordingly, AltaLink submits that TS 41) should be struck out in its entirety.</p>	
	Comments on transmission line developments - Environmental guidelines checklist for applicants	<ul style="list-style-type: none"> AltaLink has similar concerns with the use of environmental assessment definitions and language in the guidelines as it does in relation to TS 39). Please see comments for TS 39) for more detail. 	The AUC revisions were intended to utilize terminology that is consistent with that used in government and industry. There is no intention to require environmental impact assessments in addition to those required under the <i>Environmental Enhancement and Protection Act</i> . For this reason, the term, "environmental evaluation" is used.
	Comments on substation developments - Environmental guidelines checklist for applicants	<ul style="list-style-type: none"> AltaLink has similar concerns with the paraphrasing of the requirements of the EPEA as stated above in relation to TS 41). Alta link suggests that the Commission refer to the EPEA and The Release Reporting Regulation only, and remove the portion of the footnote that attempts to paraphrase the content of the legislation. 	As discussed previously in this document, the AUC will revise TS41) as "If the project is to be constructed within an area of a substation for which approval is being sought..... "

Stakeholder	Section	Stakeholders' comments	AUC response
	General comment on substation modification	<ul style="list-style-type: none"> As stated in past working meetings and correspondence, AltaLink submits that, for substation modification applications, historical information required should be limited to the area of the substation site upon which the approval is being sought. Often substation modifications only impact one portion of a substation site and not the entire substation. Accordingly, management of a past release in one area of the substation may have no impact on the project work being applied for. In the case of releases, AltaLink works with AEP directly and follows all applicable rules and legislation regarding release reporting, clean up and remediation. 	As discussed previously in this document, the AUC will revise TS41) as "If the project is to be constructed within an area of a substation for which approval is being sought"
Environment Canada			
ENMAX Energy Corporation	PP8) Wind Power Plants and Interference with weather radars	<ul style="list-style-type: none"> ENMAX is concerned that all wind projects, regardless of their proximity to Environment Canada weather radar stations, automatically require an assessment from Environment Canada. ENMAX submits that it may be more effective and efficient to have a proximity trigger to indicate when proponents would require an Environment Canada weather radar assessment, as there are only three weather radar stations in Alberta. For all wind plants to have to obtain a weather radar assessment prior to submitting an application to the AUC application may be unnecessary. 	The AUC considers that it may be beneficial to obtain an assessment for weather radar impacts to ensure an up-to-date review. For reference, the Environment Canada website shows five existing weather radar sites in Alberta.
	PP10) Consulting with an AEP wildlife biologist	<ul style="list-style-type: none"> ENMAX requests clarification to this requirement, as it currently reads that all proponents of a power plant must consult with an AEP wildlife biologist unless within an urban area with no nearby wildlife habitat, but wind power or solar power applications need an AEP wildlife sign-off. Is this sign-off required even if it is located in an urban area with no nearby wildlife habitat? 	No.
	PP11) Historical Resources Act Clearance	<ul style="list-style-type: none"> ENMAX suggests adding the phrase "or as being applied for" back into this requirement along with the other proposed wording changes. This allows for some flexibility, as an application can be delayed as a result of Alberta Culture not issuing a Clearance in a timely fashion. All proponents would still be required to submit the Clearance to the AUC as soon as received, but it could help expedite the process if applicants had the flexibility to apply concurrently. 	The AUC agrees to revise PP11) to include flexibility for <i>Historical Resources Act</i> approval, to confirm that approval has been obtained or " has been applied for ".

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	PP17) Environmental Evaluations	<ul style="list-style-type: none"> • ENMAX submits that the proposed wording of this requirement pushes projects towards Environmental Assessments (EA) or Environmental Impact Assessments (EIAs) that would not always require one. ENMAX would like to provide the following suggestions: <ul style="list-style-type: none"> a) Adding text that allows projects that would not otherwise require an Environmental Approval or an Environmental Assessment to complete an Environmental Evaluation instead. For power plants which require an Environmental Assessment or an Environmental Impact Assessment, PP38) already requires this information to be supplied to the AUC. <p>EAs and EIAs are already defined by legislation and in regulations administered by Alberta Environment and Parks (AEP) and/or Environment Canada (EC). The AEP's Glossary of Environmental Terms and Acronyms used in Alberta February 2010, is a document that describes the definitions of certain EIA terms. The Guide to Preparing Environmental Impact Assessment Reports in Alberta, March 2013, provides steps to conduct an EIA. In these documents, specific terms have defined meanings. By introducing these terms and definitions (such as looking at Valued Ecosystem Components) is pushing all power plant projects to conduct an EA or EIA that is already requested by AEP or CEAA if required.</p> <p>In particular we are concerned with the following definitions taken from AEP's Glossary of Environmental Terms and Acronyms Used in Alberta February 2010.</p> <p>² Local Study Area (LSA) Regional Study Area</p> <p>The area existing outside the boundaries of the Project Area, where there is a reasonable potential for immediate environmental impacts due to ongoing project activities, defines the spatial extent directly or indirectly affected by the project.</p> <p>³ Life of the Project Phase/Stage</p>	<p>The AUC revisions were intended to utilize terminology that is consistent with that used in government and industry. There is no intention to require environmental impact assessments in addition to those required under the <i>Environmental Enhancement and Protection Act</i>. For this reason, the term, "environmental evaluation" is used.</p>

Stakeholder	Section	Stakeholders' comments	AUC response
		<p>The length of time required to construct, operate, decommission and reclaim all phases of a development.</p> <p>⁴ Significance (of an Effect)</p> <p>A measure of the magnitude, duration, frequency, timing, probability of occurrence, ecological and social context, geographic extent, and degree of reversibility of an effect on a Valued Ecosystem Component.</p> <p>ENMAX understands that in discussions on this topic with wires service providers, the term environmental evaluation was used to describe environmental information that would be helpful for the AUC to make environmental decisions about projects. However, considering the majority of power plant applications (wind and solar aside) require a separate environmental approval under the Environmental Protection and Enhancement Act, which either follows an Industrial Approval Application process or an Environmental Assessment process, an Environmental Evaluation is redundant. Additionally, in some circumstances a provincial or federal Environmental Assessment or Environmental Impact Assessment is required for certain types of power plant applications, which is already a requirement under PP 38).</p>	<p>The AUC revisions were intended to utilize terminology that is consistent with that used in government and industry. There is no intention to require environmental impact assessments in addition to those required under the <i>Environmental Enhancement and Protection Act</i>. For this reason, the term, "environmental evaluation" is used.</p>
	<p>Environmental Guidelines for new substation construction or existing substation modifications Flow Chart</p>	<ul style="list-style-type: none"> • Liners installed after construction – ENMAX's current practice does not include a site assessment with the installation of liners, it only includes the sampling and disposal of excess material at approved landfill locations. When installing a liner after construction, these sites are energized at the time of installation and poses a safety risk to do any further investigations/excavation. Based on this practice, ENMAX submits that it would be currently unable to provide any detailed information on potential contamination risks as requested, so ENMAX requests that this requirement be used on a go forward basis. 	<p>The AUC acknowledges the ENMAX safety perspectives and associated procedures.</p>
<p>Maskwa Environmental Consulting Ltd.</p>		<ul style="list-style-type: none"> • One comment, and potential concern, that I have regarding the current proposed changes to Rule 007 is what appears to be a more extensive requirement for the involvement of other agencies as part of facility application process. I don't view this as a bad thing, but my main concern is the extent to which these other agencies have been involved in the process and the level to which they are prepared to actively engage in the 	<p>The AUC acknowledges that many agencies have a role in the review process for new facilities.</p>

Stakeholder	Section	Stakeholders' comments	AUC response
		<p>manner that the new Rule would require them to? I'm concerned, based on past experiences, that many of these agencies, particularly AEP, may not have the resources to accommodate what is being asked/required in the new Rule and associated checklists and the degree to which their front line staff are aware of these new changes and expectations. Given that one of the stated goals of the recent and planned revisions to Rule 007 is to "streamline" the process for applications, I just wanted to make sure that these proposed changes, and somewhat more specific requirements from the various agencies, don't work against that goal. Other than that, I think many of the proposed changes look good and obviously come from the collaborative feedback of the many different stakeholders involved.</p>	
EPCOR Distribution & Transmission	<p><i>Historical Resources Act</i> approval required is now required prior to facility application filing</p>	<ul style="list-style-type: none"> TS39 of existing AUC Rule 007 requires an applicant to confirm that Historical Resources Act ("HRA") clearance has been obtained or is being applied for. This requirement has been amended in the drafted proposed changes (as TS38) to require that an applicant obtain approval under the HRA prior to submitting the application to the AUC. This change is likely to cause delays in transmission projects where an in depth review by Alberta Culture and Tourism ("ACT") is required. <p>Typically, applications for HRA approval are made with ACT after the participation involvement program is complete and a preferred route/site is selected. This normally coincides with, or occurs shortly before, filing the Facility Application with the AUC. This allows for concurrent consideration of the application by the AUC and ACT, and minimizes the schedule impact of obtaining HRA approval prior to filing the Facility Application.</p>	<p>The AUC agrees to revise TS38) to include flexibility for <i>Historical Resources Act</i> approval, to confirm that approval has been obtained or "has been applied for".</p>
	<p>NID10 – Specify the legislation under which the direct assignment must be made</p>	<ul style="list-style-type: none"> NID10 of the proposed AUC Rule 007 states: <ul style="list-style-type: none"> <i>Indicate the date by which the transmission development described in the proposed NID approval must be direct assigned to a transmission facility owner or market participant.</i> <p>In order to avoid confusion in the timing of when a project becomes "direct assigned", EDTI suggests that a reference be made to section 35(1)(a) of the Electric Utilities Act, under which the ISO directs the owner of a transmission facility to submit a transmission facility proposal to meet the need identified.</p>	<p>Footnote added, "Refer to <i>Electric Utilities Act</i> Section 35(1)."</p>

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TransAlta	Section 3.2 PP8)	<ul style="list-style-type: none"> • The proposed new requirement PP8 includes language that prohibits a wind power plant from being sited within 5 km of a federal weather radar station due to the significant interference to Environment Canada's ability to accurately forecast the weather. Recommendations in documents such as the "Technical Information and Guidelines on the Assessment of the Potential Impact of Wind Turbines on Radiocommunication, Radar and Seismoacoustic Systems" and Transport Canada's guidelines regarding "Wind Turbines and Wind Farms – Part VI" do not specify a mandatory setback but instead provide guidelines to assess each project's situation. TransAlta suggest making the 5 km setback requirement a soft requirement that allows for a shorter setback through consultation with Environment Canada. • In summary, TransAlta is making the following recommendation: <ul style="list-style-type: none"> ○ PP8 – the 5 km setback requirement should be a soft requirement that allows for a shorter setback through consultation with Environment Canada. 	<p>The AUC will revise the sentence as "No wind power plant will be permitted within a five-kilometre radius, or as otherwise agreed by Environment Canada, of a federal weather radar station due to the significant interference to Environment Canada's ability to accurately forecast the weather."</p>
	PP17)	<ul style="list-style-type: none"> • The proposed revisions to PP17 require that a person have adequate qualifications in the practice of environmental assessments in Alberta or Canada to complete an environmental evaluation for a project. This excludes environmental firms based in the United States (or further abroad). There may be cases where the most qualified companies are located outside of Canada; for example, companies experienced with solar projects. TransAlta suggests that this part of the requirement should be removed. Alternatively, it could be changed to require experience related to the type of development. <p>The fourth bullet under PP17 requires a description of "the potential adverse effects (both direct and indirect) of the project on the ecosystem components during the life of the project". The term "direct and indirect" is vague and does not provide sufficient guidance for applicants. It is implied, and standard, in environmental evaluations that all foreseen potential impacts from the project on the environment will be addressed and/or mitigated. Attempting to clarify this by adding "indirect" creates uncertainty on how far reaching project impacts should be considered. The term "indirect" impacts may be up for interpretation and cause unintended</p>	<p>The AUC will revise the sentence as "The environmental evaluation should be conducted or overseen by an individual or individuals who possess environmental experience related to the type and scale of development."</p> <p>The AUC will delete the terminology "(direct and indirect)".</p>

Stakeholder	Section	Stakeholders' comments	AUC response
		<p>delays in the application process. TransAlta suggests removing “both direct and indirect” from this bullet.</p> <p>The last bullet under PP17 requires that an applicant “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.” TransAlta is concerned about providing details regarding methodology selected to evaluate impacts, along with scientific rationale for choosing these methodologies seems to be an excessive information request. In all significant power plant developments the AUC requires consultation, and in some cases sign-off, from AEP. During AEP consultation, scientific methodology would be negotiated and agreed upon. Entering into further debate regarding the approach used to evaluate a project’s impacts after the assessment is completed does not conform to the evaluation process. Further, consultation or signoff from AEP ensures that proper government agencies with appropriate subject matter experts review the process. Duplicating this stage of the process with the AUC at time of submission appears redundant. TransAlta suggest removing this bullet.</p> <ul style="list-style-type: none"> • In summary, TransAlta is making the following recommendations: <ul style="list-style-type: none"> ○ PP17 – the requirement for a person to have qualifications in Alberta and Canada should be removed, or alternatively should be changed to require experience related to the type of development; ○ PP17, fourth bullet – remove “both direct and indirect” from this bullet; and ○ PP17, last bullet – remove the bullet. 	<p>The AUC acknowledges that duplicative processes would not be warranted, and will revise the first sentence of PP17) as “At a level of detail commensurate with the size and type of potential effect(s) of the project, complete and submit an environmental evaluation of the project and provide a sign-off from AEP addressing the environmental aspects of the project that AEP is satisfied with.”</p>
TransCanada	Section 3.2 PP17) Power plant Application Requirements	<ul style="list-style-type: none"> • TransCanada is concerned that the environmental evaluation requirements on power plant developments proposed in PP17) of AUC Rule 007 are duplicative and in some cases, could be interpreted to be inconsistent with the requirements imposed by Alberta Environment and Parks (AEP) under the Environmental Protection and Enhancement Act (EPEA), Water Act (WA) and associated regulations including the Environmental Assessment Regulation. 	<p>The AUC acknowledges that duplicative processes would not be warranted, and will revise the first sentence of PP17) as “At a level of detail commensurate with the size and type of potential effect(s) of the project, complete and submit an environmental evaluation of the project and provide a sign-off from AEP addressing the environmental aspects of the project that AEP is satisfied with.”</p>

Stakeholder	Section	Stakeholders' comments	AUC response
		<p>TransCanada is concerned that duplicative or inconsistent requirements for power plant applications under AUC Rule 007 and the EPEA creates uncertainty with respect to the requirements a project developer must satisfy, as well create the potential to increase the timelines and costs associated with carrying out the same or similar analyses and preparing applications.</p> <p>Specifically, TransCanada raises the following concerns with the proposed language in PP17):</p> <p>The terminology used by the AUC is in some cases inconsistent with the terminology used by AEP. For example, PP17) refers to the need for the applicant to complete an “environmental evaluation”. It is not clear to TransCanada how an “environmental evaluation” differs from what AEP requires in an environmental impact assessment (EIA) report as set out in the EPEA. Further, the terminology used and the requirements outlined in s.49 of the EPEA are well established and understood within the industry, however, the terminology used in PP17) and the requirements themselves are not the same as those outlined in s. 49. As a result, TransCanada is concerned that the lack of consistency at a minimum creates uncertainty and appears to suggest that the AUC requires something other than that required by AEP under s.49 to satisfy the requirements of PP17).</p> <p>In addition, PP17) states that the environmental evaluations should be conducted or overseen by an individual or individuals who possess adequate qualifications in the practice of environmental assessments. It is not clear to TransCanada who the AUC would consider qualified and TransCanada is therefore concerned that this requirement may trigger additional costs associated with hiring specific companies or consultants to complete the analysis and provide reports that could otherwise be performed by experienced internal personnel or alternative consultants.</p> <p>Further, and perhaps most significantly, for power plants less than 100 MW, or renewable power plants, AEP does not require a full EIA, nor does it require an EIA for alterations to existing power plants. However, PP17) is unclear under which circumstances a power plant owner would be exempt from carrying out an environmental evaluation that satisfies all of the</p>	<p>The AUC revisions were intended to utilize terminology that is consistent with that used in government and industry. There is no intention to require environmental impact assessments in addition to those required under the <i>Environmental Enhancement and Protection Act</i>. For this reason, the term “environmental evaluation” is used.</p> <p>The AUC will revise the sentence as “The environmental evaluation should be conducted or overseen by an individual or individuals who possess environmental experience related to the type and scale of development.”</p> <p>For clarity, at the end of PP17, the AUC will add “If the power plant project requires preparation of a federal environmental assessment (EA) report or a provincial environmental impact assessment (EIA) report, then that report should be submitted as an appendix to the application as required by PP38), and a</p>

Stakeholder	Section	Stakeholders' comments	AUC response
		<p>requirements listed in PP17). As currently worded TransCanada interprets PP17) to require an environmental evaluation in all cases where a power plant application is required including those for alterations to an existing power plant that would not trigger an EIA with AEP.</p> <p>TransCanada understands that AUC is required to consider, among other things, the impact of an application to construct or operate a hydro development, power plant or transmission line under the Hydro Electric Energy Act (HEEA) on the environment pursuant to Section 17(1) of the Alberta Utilities Commission Act (AUC Act). If the AUC's intent is to simply require the owner of a power plant to provide the AUC with the EIA that was provided to AEP and any corresponding approvals, TransCanada suggests that PP17) be amended to simply state that any and all materials provided to AEP should be included in the application for a power plant.</p> <p>Alternatively, if it is the AUC's intent is to impose additional environmental requirements than what is required by AEP it would be helpful if PP17) clearly stated under which circumstances or conditions a new facility, or an alteration to a facility, would trigger an environmental evaluation under PP17) and what specifically is required in addition to that required by AEP.</p>	<p>separate environmental evaluation report satisfying the requirements of PP17) need not be prepared for the project. In such cases, the federal EA or the provincial EIA report is sufficient to also satisfy the environmental requirements outlined in PP17)."</p>
	<p>Section 6.1 and 6.2 NID/ANID Approvals: NID10), NID18) & NID26)</p>	<ul style="list-style-type: none"> TransCanada appreciates the AUC's responsiveness to its concerns regarding amendments or cancellations of a NID or ANID Approval. TransCanada has reviewed the revised language and suggests that for ease and administrative efficiency it may be appropriate for the date referenced in NID18) and NID26) (i.e. the date by which the ISO must confirm in writing that the technical solution in the NID or ANID remains the preferred technical solution) to be selected such that the information is available prior to the date the Permit and License requires construction to be complete. By doing so this information will be available for consideration by the Commission should an extension of the Permit and License be requested. 	<p>At this time, the Commission considers that the current wording accurately reflects the preferences of the TFOs and the AESO from the consultation meetings. The AUC expects that the approval would normally remain valid for some time beyond the market participant's requested in service date (i.e. the ISO may identify in the NID or ANID a 'review date' that occurs a reasonable period after the requested in-service date.</p>
	<p>Connection Options that Cause or Exacerbate Congestion: NID23)(2)</p>	<ul style="list-style-type: none"> It is TransCanada's understanding that the AESO would consult with market participants that are potentially impacted by congestion associated with a particular connection alternative in a timely manner and therefore does not have any further comments on this requirement at this time. 	<p>The AUC also understands that the AESO would consult with market participants with respect to congestion.</p>

Stakeholder	Section	Stakeholders' comments	AUC response
	Electric Power Plant and Transmission Facilities Guidelines	<ul style="list-style-type: none"> TransCanada understands that the AUC intends to make revisions to these guidelines to accommodate changes to Rule 007 regarding Isolated Generation. TransCanada would be supportive of a review and would be interested in participating in a consultation on these guidelines. 	The AUC will continue to consult as appropriate for the scope and nature of guidelines and rules.