



**Suncor Energy Inc.**

**Hand Hills Wind Power Project  
Time Extension**

**February 7, 2018**

**Alberta Utilities Commission**

Decision 22808-D04-2018

Suncor Energy Inc.

Hand Hills Wind Power Project

Time Extension

Proceeding 22808

Applications 22808-A001 and 22808-A002

February 7, 2018

Published by the:

Alberta Utilities Commission

Fifth Avenue Place, Fourth Floor, 425 First Street S.W.

Calgary, Alberta

T2P 3L8

Telephone: 403-592-8845

Fax: 403-592-4406

Website: [www.auc.ab.ca](http://www.auc.ab.ca)

## **1 Decision summary**

1. In this decision, the Alberta Utilities Commission must decide whether to approve an application from Suncor Energy Inc. for a time extension to complete construction of the 80-megawatt Hand Hills Wind Power Plant and Hand Hills 605S Substation in the Delia area. After consideration of the record of the proceeding, and for the reasons outlined in this decision, the Commission finds that approval of the time extension is in the public interest, having regard to the social, economic, and other effects of the project, including its effect on the environment.

## **2 Introduction and background**

2. Suncor Energy Inc. (Suncor) has approval to construct and operate the 80-megawatt (MW) Hand Hills Wind Power Plant and the Hand Hills 605S Substation in the Delia area pursuant to Approval 22808-D02-2017<sup>1</sup> and Permit and Licence 22808-D03-2017.<sup>2</sup> The power plant shall consist of 54 General Electric 1.6-100, 1.62-MW wind turbines, with a total generating capability of 80 MW.

3. Suncor, by applications 22808-A001 and 22808-A002, registered with the Commission on July 18, 2017, requested approval of a time extension from December 31, 2018, to June 1, 2021, in order to complete construction of the power plant and the new substation.

4. Due to the minor nature of the application, a notice of application was not issued and, therefore, a hearing was not required as the Commission considered that its decision or order would not directly and adversely affect the rights of a person pursuant to Section 9 of the *Alberta Utilities Commission Act*.

## **3 Discussion**

5. Suncor stated that the requested time extension is to align with the Government of Alberta's Renewable Electricity Program. Suncor indicated that it intended to participate in the first Renewable Electricity Program round. The Government of Alberta required successful proponents to reach commercial operation of the facility by December 1, 2019, with a possibility of an 18-month extension. Suncor stated that the requested June 1, 2021 time extension date corresponded with those deadlines.

---

<sup>1</sup> Power Plant Approval 22808-D02-2017, Proceeding 22808, Application 22808-A001, November 2, 2017.

<sup>2</sup> Substation Permit and Licence 22808-D03-2017, Proceeding 22808, Application 22808-A002, November 2, 2017.

6. Suncor stated that the requested time extension does not have any adverse effects on the environment. Further, Suncor stated that the requested time extension does not affect conditions imposed by the Commission in its approval or approvals and sign-offs from other agencies. Suncor indicated that no physical changes are being proposed and it does not have the potential to directly or adversely affect persons in the vicinity of the approved wind power plant.

7. The Commission issued three rounds of information requests to Suncor to confirm details of the applications on August 17, 2017, September 28, 2017, and January 4, 2018. Suncor provided information responses to the Commission on September 5, 2017, October 5, 2017, and January 11, 2018, respectively. In its first round of information requests, the Commission asked Suncor to re-consult with the Alberta Environment and Parks (AEP) Wildlife Management (WM) regional wildlife biologist about the time extension request's potential effects on wildlife, including itemizing what pre-construction wildlife surveys need to be completed/re-done, describing any required changes to the project's post-construction wildlife monitoring program, and indicating whether an updated AEP WM renewable energy referral report was required for the project.

8. In its responses to the first round of information requests, Suncor stated that AEP WM had informed Suncor that an updated renewable energy referral report was required for the project and Suncor committed to obtaining this referral report prior to starting construction. Suncor stated that AEP WM required the completion of updated pre-construction wildlife surveys, including an additional year of pre-construction bat activity surveys in the fall of 2017. Suncor also stated that it would develop an updated environmental protection plan for the project incorporating the updated wildlife survey results and any of AEP WM's mitigation requirements.

9. In its responses to the second round of information requests, Suncor confirmed its commitment to comply with all of AEP WM's wildlife mitigation requirements described in the project's original December 20, 2012 referral report, and also to meet any new pre-construction and post-construction wildlife mitigation required by AEP WM in its updated referral report.

10. Suncor submitted a copy of AEP WM's Renewable Energy Wildlife Information Review update letter for the project on December 5, 2017. In its responses to the third round of information requests, Suncor confirmed that it would develop a post-construction wildlife monitoring and mitigation plan that would be reviewed by AEP WM prior to construction and would comply with AEP's 2017 *Wildlife Directive for Alberta Wind Energy Projects*. Suncor also confirmed that the post-construction wildlife monitoring and mitigation plan along with the updated environmental protection plan would include consideration of any new sensitive wildlife habitat features (e.g., sharp-tailed grouse leks, raptor nests) that may be discovered during updated pre-construction wildlife surveys. Suncor also stated that raptor nest and sharp-tailed grouse lek surveys will be kept current (i.e., less than two years old) up until the start of construction and that a raptor nest discovery and mitigation plan would be prepared if any construction occurs during the raptor breeding season. Additionally, Suncor stated that it would employ a minimal disturbance technique, such as direct plough-in, to install any collector lines that cross native grasslands or are located within species at risk minimum setbacks.

11. Suncor submitted that a participant involvement program was not conducted for the time extension request. Suncor submitted that it has continued to actively engage stakeholders since the project was approved on December 4, 2014. Suncor stated that it held a community open

house on November 24, 2016, where it had shared current information on the project including Suncor's intent to delay construction of the project to align with the Renewable Electricity Program. Suncor indicated that general concerns that were part of the original proceeding were mentioned at the open house including visual and construction impacts.

#### 4 Findings

12. Suncor has provided information respecting the need, nature and the duration of the requested time extension. Based upon the information provided, the Commission finds that Suncor has demonstrated that the requested time extension is of a minor nature.

13. The Commission requires Suncor to meet its commitments to address AEP WM's required updates and amendments to the project's wildlife mitigation since the project was originally reviewed by AEP WM in 2012. Accordingly, Suncor shall develop an updated environmental protection plan prior to construction of the project and implement the mitigation measures in that plan during construction and operation. Prior to construction, Suncor shall also develop and submit to AEP and the AUC for review/approval a post-construction wildlife monitoring and mitigation plan that complies with Stage 4 of AEP's 2017 *Wildlife Directive for Alberta Wind Energy Projects*. During operation, Suncor shall implement the monitoring and mitigation commitments contained in the project's post-construction wildlife monitoring and mitigation plan.

14. Suncor shall comply with all directions received from AEP, including the recommendations and requirements outlined in AEP WM's December 1, 2017 Renewable Energy Wildlife Information Review update letter.<sup>3</sup>

15. Suncor shall meet all of its pre-construction and post-construction wildlife survey and mitigation commitments as set out in Exhibit 22808-X0017,<sup>4</sup> including:

- Updating the avian use, breeding bird, and burrowing owl surveys for the original project area.
- Developing and implementing mitigation to address the three newly discovered sharp-tailed grouse leks whose 500-metre minimum setback will be compromised by the project's turbines, collector lines, and permanent roads.
- Developing and implementing a raptor nest discovery and mitigation plan if any construction occurs during the raptor breeding season.
- Keeping raptor nest, burrowing owl, and sharp-tailed grouse lek pre-construction surveys current (i.e., less than two years old) until the start of construction.

---

<sup>3</sup> Exhibit 22808-X0014, AEP Supplementary Review Letter – Hand Hills Wind Project\_signed.

<sup>4</sup> Exhibit 22808-X0017, 2018-01-11 – Letter to AUC re Suncor Responses to AUC Information Request.

- Constructing outside of the critical breeding period (April 1 to July 15) for grassland breeding birds.
- Meeting AEP WM's recommended minimum setbacks from wetlands and watercourses for the project.
- Installing underground collector lines that occur on native grasslands or within AEP's minimum setback for a species at risk using a minimal disturbance plough-in technique.
- Installing turbines and/or meteorological towers capable of measuring wind speed, wind direction, air temperature and barometric pressure.
- Implementing mitigation measures if the results of the post-construction wildlife monitoring and mitigation plan indicate an average estimated corrected rate of bat or bird fatalities in the vicinity of any of the turbines that exceed anticipated mortalities, or are high or otherwise unacceptable to either AEP or the AUC. Mitigation could include temporarily curtailing turbines during certain periods of the year (e.g., mid-summer to late fall), weather conditions, and time of day (e.g., dusk to dawn) in which migratory bats are more active or vulnerable to turbine-related mortalities.
- During operation of the project, communicating to AEP the discovery of a carcass of any species at risk, including sensitive migratory bat species.
- Notifying AEP WM about any bird or bat mortality issues that arise during project operation beyond the initial period of post-construction wildlife mortality surveys, and implementing effective mitigation measures in consultation with AEP WM.

16. Suncor shall submit a copy of an annual post-construction wildlife monitoring report to AEP in accordance with Stage 4 of AEP's 2017 *Wildlife Directive for Alberta Wind Energy Projects*. Suncor shall advise the Commission in writing that it has complied with this requirement within two weeks of its provision of the annual report to AEP.

17. Given the considerations discussed above, the Commission finds the application to be in the public interest in accordance with Section 17 of the *Alberta Utilities Commission Act*. The Commission grants approval of a time extension to June 1, 2021, to complete construction of the project.

## 5 Decision

18. Pursuant to sections 11, 14, 15 and 19 of the *Hydro and Electric Energy Act*, the Commission approves the application for a time extension from December 31, 2018, to June 1, 2021, to complete the construction of Suncor's 80-MW Hand Hills Wind Power Plant and the Hand Hills 605S Substation and grants Suncor the following approvals:

- Appendix 1 – Power Plant Approval 22808-D05-2018 – February 7, 2018.
- Appendix 2 – Substation Permit and Licence 22808-D06-2018 – February 7, 2018.

Dated on February 7, 2018.

### Alberta Utilities Commission

*(original signed by)*

Neil Jamieson  
Commission Member