



July 6, 2020

JP Mousseau
Executive Director, Facilities
Alberta Utilities Commission
1400, 600 Third Avenue S.W.
Calgary, AB T2P 0G5

Re: AUC Rule 007 Engagement Policy and Aerodromes

On behalf of our members, the Canadian Renewable Energy Association wishes to provide feedback to the Alberta Utilities Commission (AUC), in response to several letters posted to the AUC Engage Site regarding land use in the vicinity of aerodromes in Alberta. Our membership agrees that preserving the safe and viable operations of aerodromes and the safety of aircraft and passengers in Canada is a top priority.

According to our “Best Practices in Indigenous and Community Engagement,” wind energy developments prioritize consulting with key stakeholders, including aerodrome operators, at the early stage of development. Additionally, as required by Rule 007, developers must obtain letters of no objection from both Transport Canada and NAV CANADA on the final project layout, via the filing of an “Aeronautical Assessment Form for Obstruction Marking and Lighting” and a “Land Use Submission Proposal” form, respectively.

Both submissions require information on the project layout and turbine specifications in order for these agencies to adequately assess and evaluate potential impacts to air navigation safety, including potential impacts to aerodromes located in the vicinity of the project. These forms are typically submitted several times during the development phase of a wind project to identify any constraints related to aeronautical safety that could potentially impact the evolving project layout during the development process. If any concerns are identified by either Transport Canada and NAV CANADA in their reviews of these submissions, the wind farm proponent must address these issues in their layout configuration and/or turbine technology prior to receiving the letters of no objection.

The Canadian Renewable Energy Association welcomes considerations taken by the Alberta Utilities Commission to accept Transport Canada and NAV CANADA guidance in ensuring safe development of wind energy projects located within the vicinity of aerodromes. These federal agencies possess the appropriate expertise, authority and resourcing to rule on any aviation-related impacts of project siting. In order to provide continuing clarity and predictability for all stakeholders, it is recommended that Rule 007 continue to require Transport Canada approval and NAV CANADA evaluation of any structures taller than 20 m, in order to facilitate the responsible and sustainable development of wind energy in Canada.

Regards,

Evan Wilson
Senior Director, Western Canada

