

1. Introduction

From June 2023 to October 2023, the AESO conducted a Participant Involvement Program (PIP) to assist in preparing its *Castle Downs Substation Modification*. The AESO also directed the legal owner of transmission facilities (TFO), in this case EPCOR Distribution & Transmission Inc., to assist the AESO in providing notification as part of the AESO's PIP.

The AESO's PIP is designed to notify Stakeholders and Indigenous groups in the area where the AESO has reasonably determined that facilities could be installed to implement the AESO's preferred option to respond to the request for system access service.

The AESO's PIP has been conducted in accordance with the requirements of Section 7.1.2, NID12 and Appendix A2 of the current Alberta Utilities Commission (Commission) Rule 007 (AUC Rule 007), effective April 25, 2022.

2. Stakeholder Notification

The AESO developed a one-page AESO Need Overview document with the purpose of notifying Stakeholders of the following items:

- a description of the need for development;
- a description of the AESO's preferred option to respond to the system access service request;
- identification of the general area where facilities could be installed to implement the AESO's preferred option to respond to the system access service request;
- the AESO's contact information, including telephone, email and website, for further information; and
- the AESO's next steps.

A copy of the Need Overview was posted to the AESO website at <https://www.aeso.ca/grid/transmission-projects/castle-downs-substation-modification-2543/> and a notice was published in the AESO Stakeholder Newsletter on June 28, 2023. Copies of the Need Overview posting and the AESO Stakeholder Newsletter notice have been included as Attachments 1 and 2, respectively. The Need Overview was also included with the TFO's project-specific information packages that were distributed to Stakeholders, as further described in Section 2.1 and 2.2.

2.1 Stakeholders Notified in the TFO's PIP

The TFO has advised the AESO that its PIP included notification within the first row of development surrounding the proposed project as recommended by the Commission in Appendix A1 in AUC Rule 007.¹

The TFO notified a total of approximately 675 Stakeholders, of which 673 were classified as private or individual landowners. The other two notified Stakeholders are listed below:

¹ The TFO has identified its facility application to be of the type: *Overhead or underground transmission line and/or substation upgrades and/or minor transmission line replacements within the original right-of-way urban* as categorized in AUC Rule 007, Appendix A1, Section 5.

- City of Edmonton
- TELUS Communications

Attachment 3 includes the TFO's project newsletter, which was included with the AESO Need Overview in the TFO project-specific information package that was distributed to the Stakeholders described above between June 22, 2023 and July 18, 2023. The TFO's project newsletter and the AESO Need Overview were also posted on the TFO's project-specific webpage at <https://www.epcor.com/products-services/infrastructure/construction-projects/Pages/castledowns-substation-building-addition.aspx>, on June 22, 2023. The TFO's project newsletter included the AESO's contact information, a description of the AESO's role, a reference to the AESO Need Overview, and an invitation to contact the TFO or the AESO for additional information.

3. Notice of ANAP Consideration

Most recently, the AESO notified Stakeholders of its intention to consider the need for the Castle Downs substation modification to be approved under the AESO's Abbreviated Needs Approval Process (ANAP), by posting a notice to the AESO website at <https://www.aeso.ca/grid/transmission-projects/castle-downs-substation-modification-2543/> and a publishing notice in the AESO Stakeholder Newsletter on October 4, 2023. Copies of the AESO website posting and the AESO Stakeholder Newsletter notice have been included as Attachments 4 and 5, respectively.

4. Responding to Questions and Concerns

To ensure that Stakeholders had the opportunity to provide feedback, the AESO provided Stakeholders and with AESO contact information, including a dedicated, toll-free telephone line (1-888-866-2959) and a dedicated email address (stakeholder.relations@aeso.ca). The AESO Need Overview included this contact information, along with the AESO's mailing address (2500, 330 5th Ave. SW, Calgary) and website address (www.aeso.ca), and a privacy statement that described how the AESO is committed to protecting Stakeholders' privacy.

As directed by the AESO, the TFO was prepared to direct any Stakeholder questions addressed to the AESO, or questions regarding the AESO Need Overview, to the AESO.

5. Questions and Concerns Raised

The TFO has advised that none of the Stakeholders notified by the TFO identified any concerns or objections regarding the AESO's preferred option to respond to the system access service request or the need for development.

The AESO has not received any indication of concerns or objections about the AESO's preferred option to respond to the system access service request or the need for development.

6. List of Attachments

- Attachment 1 – AESO Need Overview (June 2023)
- Attachment 2 – AESO Stakeholder Newsletter Need Overview Notice (June 28, 2023)
- Attachment 3 – TFO Project Newsletter (June 2023)
- Attachment 4 – AESO Public Notification of ANAP Consideration Posting (October 2023)
- Attachment 5 – AESO Stakeholder Newsletter Notice of ANAP Consideration (October 4, 2023)

Attachment 1 – AESO Need Overview (June 2023)

Need for the Castle Downs Substation Modification in the Edmonton area

EPCOR Distribution & Transmission Inc. (EPCOR) has applied to the AESO for transmission system access to reliably serve the growing demand for electricity in the Edmonton area. EPCOR's request can be met by the following solution:

PROPOSED SOLUTION

- Modify the existing Castle Downs substation, including adding fourteen 15 kilovolt (kV) feeder breakers.
- Add or modify associated equipment as required for the above transmission developments.

NEXT STEPS

- In late 2023 the AESO may consider the need for this project for approval under section 501.3 of the ISO rules, *Abbreviated Needs Approval Process* (ANAP Rule), or apply to the Alberta Utilities Commission (AUC) for approval of the need.
- The AESO will notify stakeholders via the AESO's website at www.aeso.ca/grid/transmission-projects prior to the project being considered under the ANAP Rule or prior to filing a needs identification document (NID) application with the AUC.

The following organizations have key roles and responsibilities in providing access to the transmission system:

THE AESO

- Must plan the transmission system and enable access to it for generators and other qualified customers.
- Can approve eligible projects through the ANAP Rule and for non-eligible projects, the AESO will prepare and submit a NID to the AUC for approval.

EPCOR

- Is the transmission facility owner in the Edmonton area.
- Is responsible for detailed siting and routing, constructing, operating and maintaining the transmission facilities.
- Is regulated by the AUC and must apply to the AUC for approval of its transmission facilities applications.

WHO IS THE AESO?

The Alberta Electric System Operator (AESO) plans and operates Alberta's electricity grid and wholesale electricity market safely, reliably and in the public interest of all Albertans. We are a not-for-profit organization with no financial interest or investment of any kind in the power industry.

We appreciate your views, both on the need for transmission system development and proposed transmission plans. If you have any questions or comments, please contact us directly.

CONTACT US

Alberta Electric System Operator

AESO Stakeholder Relations
stakeholder.relations@aeso.ca
1-888-866-2959

2500, 330-5th Avenue SW
Calgary, AB T2P 0L4
Phone: 403-539-2450

www.aeso.ca | [@theaeso](https://twitter.com/theaeso)

Attachment 2 – AESO Stakeholder Newsletter Need Overview Notice (June 28, 2023)

June 28, 2023

AESO Stakeholder Newsletter

GRID

Need Overview | Castle Downs Substation Modification in the Edmonton Area

EPCOR Distribution & Transmission Inc. (EPCOR) has applied to the AESO for transmission system access to reliably serve the growing demand for electricity in the Edmonton area. EPCOR's request can be met by the following solution:

- Modify the existing Castle Downs substation, including adding fourteen 15 kilovolt (kV) feeder breakers.
- Add or modify associated equipment as required for the above transmission developments.

The AESO has posted a Need Overview for this project on its website. Please [click here](#) to view the document or visit the AESO website at www.aeso.ca and follow the path Grid > Transmission Projects > Castle Downs Substation Modification (2543).

Attachment 3 – TFO Project Newsletter (June 2023)

PROJECT OVERVIEW

Castle Downs Substation Building Addition
16253 - 97 ST NW

JUNE 2023

PROJECT OVERVIEW

We are advising landowners, occupants and residents in your area about plans to add a new building to the existing Castle Downs substation. The substation is located at 16253 97 Street NW (see map), north of downtown Edmonton. You are receiving this package because you are located in the vicinity of the proposed work.

ABOUT EPCOR

EPCOR builds, owns and operates electrical, natural gas and water transmission and distribution networks in Canada and the United States. In Edmonton, we proudly distribute electricity to approximately 435,000 customers.

For more information about the services we provide and projects in our communities, visit epcor.com.

ABOUT THE ALBERTA UTILITIES COMMISSION (AUC)

The AUC is an independent, quasi-judicial agency of the province of Alberta. The AUC is responsible to ensure that the delivery of Alberta's utility service takes place in the public interest. The AUC must approve this project before construction can begin. For more information on the AUC's regulatory process and how you can participate in the process visit auc.ab.ca/facility-application-review-process-steps/.

WHAT'S HAPPENING

If approved, this project requires a new, metal building to be constructed in the existing Castle Downs substation. The new, standalone building will be located on the east side of the existing building, and all of the proposed work will take place within the existing substation fence line. The new structure, once complete, and the existing building will see the installation of new electrical equipment, such as switchgear.

THE NEW BUILDING

The electrical equipment inside the existing Castle Downs substation building needs to be upgraded to ensure that we can continue to provide safe and reliable power service to area residents and businesses. The new building is required to house some of the new equipment. The new building will be grey or silver in colour, and be approximately 15 metres by 4.3 metres.

EXPLAINING SWITCHGEAR

Switchgear is a part of the electrical system that serves to split electricity from a transformer to multiple distribution cables. This is similar to your house electrical panel in that it takes the incoming power and splits it amongst the many areas of your house. Switchgear performs the same function for a grouping of residential, industrial or commercial customers.

Schedule

In September 2023, EPCOR will apply to the Alberta Utilities Commission for approval to construct the new building. For more information about how you can participate in the process, please refer to the enclosed brochure entitled *Public Involvement in Needs or Facilities Applications*.

PROJECT AREA

Please note work areas may change due to weather or ground conditions.



If approved, **we plan to begin work on the new building during spring of 2024 and be finished by summer of 2024.**

If approved, work to build the new structure would take place in spring 2024. Cable excavation would start in summer 2024 to prepare for the new equipment. Once the new building is complete, we'd begin installing the new equipment, which is expected to be complete by the end of 2024. Please visit our website for updates on our construction schedule. Please provide any feedback on the project by July 17, 2023.

Project Impacts

Depending on the work location, residents and businesses can expect to see activity that is typical to construction, including company/contractor vehicles and equipment. The construction area will be fenced and/or marked as a restricted area.

Traffic

No public road closures are expected.

Power Outages

Power outages are not expected as part of this project. If a planned power service interruption is required to complete the work, and you are affected, we will notify you in advance.

Noise

The proposed work will create typical noise associated with construction. We will take measures to ensure we comply with the City of Edmonton's Community Standards Bylaw for Noise Control. If it's necessary to temporarily exceed acceptable noise levels, we will work with the City of Edmonton to receive necessary permits.

Restoration

Any required landscaping following the construction will take place once work is complete and as weather permits.

QUESTIONS OR TO PARTICIPATE IN THE PROCESS

EPCOR believes in listening to and engaging with stakeholders. Community input and involvement is an important part of our decision-making process. We believe in working towards solutions together and consulting with the public on initiatives. If you have any questions or would like to provide input on the project, please contact us:

Phone: 780-412-4040

E-mail: consultation@epcor.com

Website: epcor.com/consultation

ABOUT THE ALBERTA ELECTRIC SYSTEM OPERATOR (AESO)

The AESO is an independent, not-for-profit organization responsible for the safe, reliable and economic planning and operation of the provincial transmission grid. For more information about why this project is needed, please refer to AESO's Need Overview included in this package or visit www.aeso.ca. If you have any questions or concerns about the need for this project or the proposed transmission development to meet the need, you may contact the AESO directly.

You can also make your questions or concerns known to an EPCOR representative who will collect your contact information for the purpose of addressing your questions and/or concerns to the AESO. This process may include disclosure of your contact information to the AESO.

Alberta Electric System Operator (AESO)

Phone: 1-888-866-2959

Email: stakeholder.relations@aeso.ca

Website: www.aeso.ca

Need for the Castle Downs Substation Modification in the Edmonton area

EPCOR Distribution & Transmission Inc. (EPCOR) has applied to the AESO for transmission system access to reliably serve the growing demand for electricity in the Edmonton area. EPCOR's request can be met by the following solution:

PROPOSED SOLUTION

- Modify the existing Castle Downs substation, including adding fourteen 15 kilovolt (kV) feeder breakers.
- Add or modify associated equipment as required for the above transmission developments.

NEXT STEPS

- In late 2023 the AESO may consider the need for this project for approval under section 501.3 of the ISO rules, *Abbreviated Needs Approval Process* (ANAP Rule), or apply to the Alberta Utilities Commission (AUC) for approval of the need.
- The AESO will notify stakeholders via the AESO's website at www.aeso.ca/grid/transmission-projects prior to the project being considered under the ANAP Rule or prior to filing a needs identification document (NID) application with the AUC.

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We appreciate your views, both on the need for transmission system development and proposed transmission plans. If you have any questions or comments, please contact us directly.

CONTACT US

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Participating in the AUC's independent review process to consider facility applications

The AUC regulatory review process to consider facility applications for utility projects



The AUC uses an established process to review social, economic and environmental impacts of facility projects to decide if approval of a project is in the public interest.

The AUC considers applications requesting approval of the need for transmission development and facilities applications seeking approval to construct, operate, alter and decommission electric and natural gas facilities. Applications, as specified in AUC Rule 007, are required for:

- The need for transmission upgrades.
- The route and location of transmission facilities.
- The siting of power plants.
- The construction of a battery storage system.
- The designation of an industrial system.
- The need for and siting of natural gas utility pipelines.

Sometimes the Alberta Electric System Operator's needs identification document application is considered together with a facility application in a single proceeding; sometimes separate proceedings are held to consider each application.

Application review process



- Step 1: Public consultation prior to applying to the AUC
- Step 2: Application filed to the AUC
- Step 3: Public notice
- Step 4: Public submissions to the AUC
- Step 5: Consultation and negotiation
- Step 6: The public hearing process
- Step 7: The decision
- Step 8: Opportunity to appeal
- Step 9: Construction, operation and compliance

Application review process

Step 1: Public consultation prior to applying to the AUC



An applicant seeking approval of a proposed utility development project is required to engage in a participant involvement program prior to filing an application with the AUC. The public involvement program involves consultation with persons whose rights may be directly and adversely affected by the proposed project so that concerns may be raised, addressed and, if possible, resolved.

The application guidelines and requirements for facility applications can be found in AUC Rule 007: *Applications for Power Plants, Substations, Transmission Lines, Industrial System Designations, Hydro Developments and Gas Utility Pipelines*.

Potentially affected parties are strongly encouraged to participate in the public consultation, also called a participant involvement program. Early, active and ongoing discussions with an applicant may lead to greater influence on project planning and what is submitted to the AUC for approval.

Step 2: Application filed to the AUC



When the applicant has concluded its consultation with potentially affected parties and the participant involvement requirements have been completed, the applicant files its application through the AUC online public filing system, called the eFiling System.

AUC staff members review each application submitted to verify that all of the application requirements in Rule 007 have been met before an application is deemed complete. If all of the required information is not provided, the application may be closed or missing information will be requested of the applicant. Rule 007 specifies, among other requirements, that applicants must submit the results of a public involvement program in its application that includes information about how applicants consulted and notified stakeholders and Indigenous groups and identifies any unresolved objections and concerns about the project.

Step 3: Public notice



When the AUC receives an application it is assigned a proceeding number and the AUC generally mails a notice of application directly to those who live, operate a business or occupy land in the project area who may be directly and adversely affected if the AUC approves the application. The notice initiates the opportunity for formal intervention in the proceeding to consider an application or applications. The notice of application will also set out important dates and information about where to find the application and other items being considered. The five-digit eFiling System proceeding number in the notice is the most efficient way to find information about a proposed project through the AUC website.

Step 4: Public submissions to the AUC



Prior to the submission deadline provided in the notice, formal submissions of outstanding concerns and unresolved objections about a project may be submitted to the AUC. To submit a concern, participants will need to register to participate in the proceeding, which involves providing a brief written statement called a statement of intent to participate. Submissions are filed electronically through the eFiling System. The information filed becomes part of the public record and is an important part of the process to ensure that outstanding concerns are heard, understood and considered.

The AUC uses the information gathered through statement of intent to participate submissions to decide whether to hold a hearing on the application(s). The AUC must hold a hearing if a concerned person can demonstrate that they have rights that may be directly or adversely affected by the AUC's decision on the application. Such a person is said to have standing before the AUC. If the AUC decides to hold a hearing, the AUC will provide further opportunities for participants with standing to ask the applicant questions on the public record and present their position on the application either in writing or in person. Hearings may

be held in writing, in person or virtually through web-conference software.

AUC eFiling System

The eFiling System is the online tool that the AUC uses to manage applications and submissions in its proceeding-based review. The eFiling System gives access to all public documents associated with an application. The system is also used to submit your concerns and provide input to the AUC and can be used to monitor related proceeding filings. Those who do not have access to the internet can send submissions, evidence and other material by mail and the AUC will upload the submission on their behalf.

Step 5: Consultation and negotiation (if applicable)



The AUC supports efforts to reach a mutually agreeable outcome among the applicant and affected parties. The AUC encourages the applicant and those who have filed a statement of intent to participate to continue to attempt to resolve any outstanding issues. If all concerns can be satisfactorily resolved this may eliminate the need for a formal hearing. However, if there continues to be unresolved issues, those matters will typically be addressed in an AUC hearing.

Step 6: The public hearing process



The AUC will issue a notice of hearing if a person with standing continues to have legitimate unresolved concerns with the application. The notice of hearing will provide a hearing date and location, or specify if the hearing will be held in writing or virtually. When the AUC holds a public hearing, registered parties are given the opportunity to express their views directly to a panel of Commission members. Any member of the public can listen to an in-person or virtual oral hearing. An oral public hearing operates similar to a court proceeding.

Participants in a hearing can either represent themselves or be represented by a lawyer. In addition, participants may hire experts to assist in preparing and presenting evidence to support their position.

Cost assistance



A person determined by the AUC to have standing or a local intervener can apply for reimbursement of reasonable costs. Those who hire a lawyer or technical experts must be aware that while reimbursement for the costs of legal and technical assistance is available under AUC Rule 009: *Rules on Local Intervener Costs*, recovery of costs is subject to the AUC's assessment of the value of the contribution provided by the lawyer and technical experts in assisting the AUC to understand the specifics of the case. It is also subject to the AUC's published scale of costs.

People with similar interests and positions are expected and encouraged to work together to ensure that expenditures for legal or technical assistance are minimized and costs are not duplicated.

Step 7: The decision



The AUC's goal is to issue its written decision no more than 90 days after the close of record. The AUC can approve, or deny an application and can also make its approval conditional upon terms or conditions. AUC decisions are publicly available through the AUC website at www.auc.ab.ca.

Step 8: Opportunity to appeal



An applicant or participant in a proceeding may formally ask the Court of Appeal of Alberta for permission to appeal an AUC decision. An application for permission to appeal must be filed within 30 days from the date the decision is issued.

An applicant or participant in a proceeding can also ask the AUC to review its decision. An application to review a decision must be filed within 60 days from the date the decision is issued and satisfy the limited grounds described in AUC Rule 016: *Review of Commission Decisions*.

Step 9: Construction, operation and compliance



An applicant that receives approval to build and operate a facility from the AUC is expected to follow through on any commitments it has made to parties and must adhere to any conditions that were set out in that approval. If concerns about compliance with approval conditions and post-construction operations cannot be resolved with the applicant, they can be brought to the AUC's attention for consideration. The AUC has significant compliance and enforcement powers for all approved applications. Additional information is available on the AUC website.



The Alberta Utilities Commission is an independent, quasi-judicial agency of the government of Alberta that ensures the delivery of Alberta's utility services take place in a manner that is fair, responsible and in the public interest.

We are committed to ensuring that Albertans whose rights may be directly and adversely affected by a utility development project are informed of the application and have the opportunity to have their concerns heard, understood and considered.

Contact us

Phone: 310-4AUC
1-833-511-4282 (outside Alberta)
info@auc.ab.ca
www.auc.ab.ca

Eau Claire Tower
1400, 600 Third Avenue S.W.
Calgary, Alberta T2P 0G5

Attachment 4 – AESO Public Notification of ANAP Consideration Posting (October 2023)

Castle Downs Substation Modification (2543)

Abbreviated Needs Approval Process: Notice of Consideration

The AESO intends to consider the need for the Castle Downs Substation Modification (Project) for approval under Section 501.3 of the ISO rules, *Abbreviated Needs Approval Process*, (ANAP Rule) on or after October 19, 2023. If stakeholders have any questions or concerns, please contact the AESO before this date.

The AESO has determined that the Project is eligible for consideration under the ANAP Rule because the following eligibility criteria have been met:

- project cost is estimated to be less than \$15M with all costs classified as participant-related in accordance with ISO tariff;
- the AESO has completed a participant involvement program (PIP) in accordance with the guidelines in Alberta Utilities Commission Rule 007;
- the Project is not anticipated to result in significant environmental effects; and
- no concerns or objections with the need for the Project have been raised. Prior to making its approval decision, the AESO will address additional stakeholder concerns that arise, if any.

Supporting information about this Project is available in the following documents:

- DFO Distribution Deficiency Report
- Engineering Connection Assessment
- TFO Cost Estimate
- AESO PIP Summary

Attachment 5 – AESO Stakeholder Newsletter Notice of ANAP Consideration (October 4, 2023)

October 4, 2023

AESO Stakeholder Newsletter

GRID

Abbreviated Needs Approval Process Notice of Consideration | Castle Downs Substation Modification

The AESO intends to consider the need for the Castle Downs Substation Modification for approval under Section 501.3 of the ISO rules, Abbreviated Needs Approval Process, (ANAP Rule) on or after October 19, 2023. If stakeholders have any questions or concerns, please contact the AESO before this date.

EPCOR Distribution & Transmission Inc. (EPCOR) has applied to the AESO for transmission system access to reliably serve the growing demand for electricity in the Edmonton area. EPCOR's request can be met by the following solution:

- Modify the existing Castle Downs substation, including adding fourteen 15 kilovolt (kV) feeder breakers.
- Add or modify associated equipment as required for the above transmission developments.

The AESO has posted a Need Overview for this project on its website. Please [click here](#) to view the document or visit the AESO website at www.aeso.ca and follow the path Grid > Transmission Projects > Castle Downs Substation Modification (2543) to see relevant supporting documents.